



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS

November 9, 2020

Ray S. McAllister, Ph.D.  
Senior Director, Regulatory Policy  
Crop Life America

Dear Dr. McAllister:

This letter is in response to your email of September 15, 2020, submitted on behalf of CLA, CBC, CDPA, BPIA, and RISE, in which it was requested that EPA extend the deadline for submissions of CSF amendments for products for which certain formulation changes have been made relative to the pesticide product preservative 1,2-benzisothiazolin-3-one (BIT) (CAS Reg. No. 2634-33-5).

Specifically, EPA allowed for a temporary (24 month) streamlined self-certification process to allow for the substitution of specific sources of BIT or specific BIT alternative inert ingredients to address unforeseen BIT production site closures and significant supply chain interruptions as detailed in a series of letters to CLA, CBC, CDPA, BPIA, and RISE dated August 23, 2018, October 18, 2018, and December 21, 2018. In those letters it was noted that “At the end of this 24-month period, unless evidence is presented that there continues to be market instability, the Agency will require the submission of new or amended CSFs for any product for which the source of BIT has changed from what is listed on the current CSF.” It was expected that those submissions would be made within 90 days of the 24-month temporary process.

Based on the information provided in your email addressing continued BIT supply chain interruptions, the Agency recognizes the need to provide registrants reasonable flexibility in allowing for resolution of this issue, and does hereby extend the temporary streamlined self-certification process described in the 2018 letters to December 31, 2021. With regard to your other requests (clarification of existing stocks provision and a grace period for CSF modifications), the Agency will further consider those requests in light of the granting of this extension of the self-certification process and will provide a formal response to those requests in a separate correspondence.

Sincerely,

Ed Messina, Esq., Acting Director  
Office of Pesticide Programs