

Anonymous public comment

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This is comment on [PROPOSED RULE](#): FIFRA Scientific Advisory Panel; Notice of Public Meeting

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The following statement has been submitted by 26 leading corn insect scientists working at public research institutions located in 16 corn producing states. All of the scientists have been active participants of the Regional Research Projects NCCC-46 "Development, Optimization, and Delivery of Management Strategies for Corn Rootworms and Other Below-ground Insect Pests of Maize" and/or related projects with corn insect pests. The statement may be applicable to all EPA decisions on PIPs, not just for the current SAP. It should not be interpreted that the actions and opinions of these 26 scientists represent those of the entire group of scientists participating in NCCC-46. The names of the scientists have been withheld from the public docket because virtually all of us require cooperation from industry at some level to conduct our research.

Statement: "Technology/stewardship agreements required for the purchase of genetically modified seed explicitly prohibit research. These agreements inhibit public scientists from pursuing their mandated role on behalf of the public good unless the research is approved by industry. As a result of restricted access, no truly independent research can be legally conducted on many critical questions regarding the technology, its performance, its management implications, IRM, and its interactions with insect biology. Consequently, data flowing to an EPA Scientific Advisory Panel from the public sector is unduly limited."