To: Parrott, Patricia[parrott.patricia@epa.gov]
Cc: Dawson, Jeffrey[Dawson.Jeff@epa.gov]
From: Vogel, Dana
Sent: Fri 1/29/2016 2:50:46 PM
Subject: Fwd: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration
EPA commnets BRA TBT 648 pesticides 12-8-15 d_JD.doc
ATT00001.htm

Here are jeffs comments, mostly on exposure. I will send Anna's comments which focus on hazard separately .
Sub

Dana Vogel
Sent from my iPhone

Begin forwarded message:

From: "Dawson, Jeffrey" <Dawson.Jeff@epa.gov>
Date: January 28, 2016 at 3:38:12 PM EST
To: "Vogel, Dana" <Vogel.Dana@epa.gov>
Subject: RE: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Here are my comments - we can talk tomorrow. Basically it negates the whole science of exposure assessment and our risk management approach.

Thanks

Jeffrey L Dawson

Acting Deputy Director

Health Effects Division

Office of Pesticide Programs, U.S. EPA

Phone: 703-305-7329

Email: dawson.jeff@epa.gov

From: Vogel, Dana
Sent: Thursday, January 28, 2016 3:27 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: Re: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Ok, I'll

Wait to reply to patty.

Thanks

Dana Vogel

Sent from my iPhone

On Jan 28, 2016, at 3:26 PM, Dawson, Jeffrey <Dawson.Jeff@epa.gov> wrote:

I'm working on this too… I'll send my comments tomorrow morning.

Jeffrey L Dawson

Acting Deputy Director

Health Effects Division

Office of Pesticide Programs, U.S. EPA

Phone: 703-305-7329

Email: dawson.jeff@epa.gov

From: Vogel, Dana
Sent: Thursday, January 28, 2016 3:23 PM
To: Lowit, Anna <Lowit.Anna@epa.gov>
Cc: Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Middleton, Karlyn <Middleton.Karlyn@epa.gov>; Mendez, Elizabeth <Mendez.Elizabeth@epa.gov>
Subject: Re: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Yes I'll

Send them to patty. Thanks!

Dana Vogel

Sent from my iPhone

On Jan 28, 2016, at 2:19 PM, Lowit, Anna <Lowit.Anna@epa.gov> wrote:

Here is the compiled set of comments Liz, Karlyn & I developed. We had made comments about the classification system but that's already in the letter, so I deleted our comments.

Do these go to FEAD?

Anna B. Lowit, Ph.D.

Senior Scientist

Health Effects Division

Office of Pesticide Programs, USEPA

w: 703-308-4135

c: 703-258-4209

From: Vogel, Dana
Sent: Wednesday, January 27, 2016 11:27 AM
To: Lowit, Anna <Lowit.Anna@epa.gov>
Cc: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: Fwd: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Please let me know what you think.

We will

Probably need to

Do the response

Dana Vogel

Sent from my iPhone

Begin forwarded message:

From: "Parrott, Patricia" <parrott.patricia@epa.gov>
Date: January 27, 2016 at 11:22:38 AM EST
To: "Vogel, Dana" <Vogel.Dana@epa.gov>
Subject: FW: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Dana: Brazil has proposed using the hazard based approach to pesticide registration (the English version is attached). We have been asked to comment on the draft US response (attached file dated 12-8-15).

With Bill gone and Daniella recused, I am trying to determine if we had provided comments previously or if we are OK with the response. If no one in HED has reviewed it, could someone look it over to see if we need any changes? From my non-technical perspective it looks OK, but there may be a technical perspective missing--?

The problem is that we are overdue, and they are asking for us to concur or provide changes by this Friday, 29 Jan. Is there anyone who could look it over –focusing on the response (not the entire Brazilian proposal). Pls let me know. Thanks.

Patricia Parrott

Deputy Director

Field and External Affairs Division

US EPA (Mail Code 7506P)

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Phone: 703 305-0744

parrott.patricia@epa.gov

From: Sanchez, Becxi - FAS [mailto:Becxi.Sanchez@fas.usda.gov]
Sent: Wednesday, January 27, 2016 10:48 AM
To: Avila, Marielsie - FAS <Marielsie.Avila@fas.usda.gov>; Parrott, Patricia <parrott.patricia@epa.gov>; Taveau, Daniella <Taveau.Daniella@epa.gov>
Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Subject: RE: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration
Importance: High

Thank you, Marielsie, Patricia et al,

Here are the draft comments currently in interagency review.

We look forward to receiving any edits you may have.

Cheers,

Becxi

From: Avila, Marielsie - FAS
Sent: Wednesday, January 27, 2016 8:27 AM
To: Parrott, Patricia; Taveau, Daniella; Sanchez, Becxi - FAS
Cc: Keigwin, Richard; Wise, Louise
Subject: RE: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Patricia,

I don't have the requested comments. I was adding Becxi to the previous messsage so she can send them to you. Becxi is the coordinator for TBT measures.

Thanks,

Marielsie Avila

International Trade Specialist

International Regulations and Standards Division |Foreign Agricultural Service |United States Department of Agriculture|1400 Independence Ave. SW, Room 5932-S |Washington, DC 20250 USA|Phone: 202-720-2151|Email: Marielsie.avila@fas.usda.gov

From: Parrott, Patricia [mailto:parrott.patricia@epa.gov]
Sent: Wednesday, January 27, 2016 8:24 AM
To: Avila, Marielsie - FAS; Taveau, Daniella; Sanchez, Becxi - FAS
Cc: Keigwin, Richard; Wise, Louise
Subject: RE: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Marielsie: There was no attachment. Would you pls resend. Thanks.

Patricia Parrott

Deputy Director

Field and External Affairs Division

US EPA (Mail Code 7506P)

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Phone: 703 305-0744

parrott.patricia@epa.gov

From: Avila, Marielsie - FAS [mailto:Marielsie.Avila@fas.usda.gov]
Sent: Wednesday, January 27, 2016 7:41 AM
To: Taveau, Daniella <Taveau.Daniella@epa.gov>; Parrott, Patricia <parrott.patricia@epa.gov>; Sanchez, Becxi - FAS <Becxi.Sanchez@fas.usda.gov>
Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Subject: RE: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

+Becxi Sanchez

Marielsie Avila

International Trade Specialist

International Regulations and Standards Division |Foreign Agricultural Service |United States Department of Agriculture|1400 Independence Ave. SW, Room 5932-S |Washington, DC 20250 USA|Phone: 202-720-2151|Email: Marielsie.avila@fas.usda.gov

From: Taveau, Daniella [mailto:Taveau.Daniella@epa.gov]

Sent: Tuesday, January 26, 2016 5:11 PM
To: Parrott, Patricia
Cc: Keigwin, Richard; Avila, Marielsie - FAS; Wise, Louise
Subject: Re: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Of course. Marielsie-- can you please send Patty the latest version of the U.S. comments on the Brazil pesticide measure when you are back in the office?

Daniella

On Jan 26, 2016, at 3:14 PM, Parrott, Patricia <parrott.patricia@epa.gov> wrote:

> I understand. Would you pls resend me the comments to ensure I have the correct document. With Bill Jordan gone and you sidelined I want to ensure we follow through appropriately. Thanks
>
> Sent from my iPhone
>
> On Jan 26, 2016, at 3:05 PM, Taveau, Daniella <Taveau.Daniella@epa.gov> wrote:
>
>> Patty,
>
>
>> I am recused and cannot follow up with Janet. However, we asked for an extension of 60 days which was granted. We also drafted comments which were circulated to OPP approximately a month ago. We have not submitted them as we are still within our deadline for comments. If OPP has comments, please send them to Marielsie on cc. I wish I could be more helpful, but I am very limited on what I am allowed to do right now.
>>
>> Daniella
>>
>> On Jan 26, 2016, at 1:40 PM, Parrott, Patricia <parrott.patricia@epa.gov> wrote:
>>
>>> Daniella. Was FAS going to provide comments from the US govt on this? Not sure what the expectation was for further input or if anything else is needed from OPP. Do we have

some standard language that we have used in the past to express our concerns with the hazard approach when this has come up previously?

We are reaching out to our NAFTA colleagues in Mexico to see if they have had any interaction with Brazil on this proposal.

Also, Janet Collins from CLA called me to ask what we have done in response to this. Are you following up w CLA, as you had initially spoken to them about this? Pls let me know. Thanks

Sent from my iPhone

Begin forwarded message:

From: "Jordan, William" <Jordan.William@epa.gov>
Date: November 9, 2015 at 3:36:35 PM EST
To: "Parrott, Patricia" <parrott.patricia@epa.gov>
Subject: FW: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Here is the information from Brazil.

Bill

William Jordan

Deputy Director, Programs

Office of Pesticide Programs

U. S. Environmental Protection Agency

Phone: 703-305-1049

Fax: 703-308-4776

Mailing Address:

USEPA Headquarters
Clinton Building
1200 Pennsylvania Ave., NW
Mail Code (7501P)
Washington, DC 20460

Courier Address:

Potomac Yards South
2777 Crystal Drive
Room 12-235
Arlington, VA

From: Taveau, Daniella
Sent: Monday, November 09, 2015 2:53 PM
To: Jordan, William <Jordan.William@epa.gov>
Cc: Wise, Louise <Wise.Louise@epa.gov>; Lewis, Susan <Lewis.Susan@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Herndon, George <Herndon.George@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Helfgott, Daniel <Helfgott.Daniel@epa.gov>
Subject: Fwd: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Bill,

I just met with CLA and we discussed several issues.

First, are you familiar with concerns about Brazil adopting a hazard-based toxicological approach to

pesticide management? I had not seen this but am looking into it.

Second, I would like to set up a meeting with OPP and CLA to discuss this, NAFTA, and Codex among other things. Are there dates that work for OPP?

Daniella

Begin forwarded message:

From: "Ray McAllister" <RMcAllister@croplifeamerica.org>
To: "Taveau, Daniella" <Taveau.Daniella@epa.gov>
Cc: "Janet Collins" <jcollins@croplifeamerica.org>
Subject: FW: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

I've also attached the translation of the Brazilian proposed regulation that we have been working from. I still haven't figured out who did the translation (industry or Brazilian government). I need to do a bit more ch3ecking before sharing the CropLife draft comments to Brazil with you.

Ray S. McAllister, PhD

Senior Director, Regulatory Policy

CropLife America

202-872-3874 (office)

202-577-6657 (cell)

ray@croplife.us

From: Ray McAllister
Sent: Friday, October 30, 2015 11:35 AM

To: 'Lance, Jennifer - FAS' <Jennifer.Lance@fas.usda.gov>; Rasmussen, Mark - FAS <Mark.Rasmussen@fas.usda.gov>; Allen, Maurice - FAS <Maurice.Allen@fas.usda.gov>
Subject: FW: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Jennifer:

This is the notification that was received by our European colleagues.

Ray S. McAllister, PhD

Senior Director, Regulatory Policy

CropLife America

202-872-3874 (office)

202-577-6657 (cell)

ray@croplife.us

From: Benjamin.MUSALL@ec.europa.eu [mailto:Benjamin.MUSALL@ec.europa.eu]
Sent: 20 October 2015 15:45
To: Euros Jones; Joan Scott
Cc: Martin.PILSER@ec.europa.eu
Subject: New WTO Notification G/TBT/N/BRA/648 - pesticides toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration

Dear Euros and Joan,

We have just received a new WTO TBT notification from Brazil (see enclosed). According to the short content description, this concerns the following:

Draft Technical Resolution nº 87, 2 October 2015, regarding the pesticides' toxicological evaluation and classification, labels and leaflets, and the procedure to post-register alteration.

This Resolution establishes the requirements and criteria to toxicological evaluation and classification, risk evaluation, the toxicological information in labels and leaflets, besides the procedures of pesticides' post-register alteration, its components and wood preservers in ANVISA's regulation.

Have you been alerted by some of your members about this? In any case, don't hesitate to share your concerns with us, if any.

Kind regards,

Benjamin

Benjamin MUSALL
Policy Co-ordinator

European Commission
DG TRADE
Unit G.3 - Market Access, Industry, Energy and Raw Materials

CHAR 05/23
B-1049 Brussels/Belgium
+32 2 295 60 12

benjamin.musall@ec.europa.eu

More on EU trade policy

Follow the EU's Trade Policy Team on Twitter

More on the TTIP

Follow the EU's TTIP Negotiating Team on Twitter

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

<BRA648_EN.doc>

<CP_87_-_2015_English_Version - Oct 13.doc>

<Comments on Brazil Anvisa tox requirements_draft_compiled.docx>