To: Lowit, Anna[Lowit.Anna@epa.gov]
Cc: Dawson, Jeffrey[Dawson.Jeff@epa.gov]
From: Vogel, Dana
Sent: Wed 1/27/2016 4:27:13 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
BRA TBT 648 pesticides 12-8-15 d.doc
ATT00001.htm
Brazil CP_87_-_2015_English_Version - Oct 13.doc
ATT00002.htm

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:	Courier Address:
USEPA Headquarters	Potomac Yards South
Clinton Building	2777 Crystal Drive
1200 Pennsylvania Ave., NW	Room 12-235
Mail Code (7501P)	Arlington, VA

Washington, DC 20460

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

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<BRA648_EN.doc>

<CP_87_-_2015_English_Version - Oct 13.doc>