Message

From: MARVIN, THOMAS [AG/1920] [thomas.marvin@bayer.com]
Sent: 8/28/2019 12:36:07 PM
To: Kenny, Daniel [Kenny.Dan@epa.gov]
Subject: RE: Invora

Hi Dan. Circling back to your question below on prioritizing Bayer's pending dicamba HT applications. We identified 7 pending dicamba HT applications (please let us know if we missed any). We propose that OPP prioritize 2 of those 7 pending applications per the table below. Happy to discuss next steps or to provide any additional info.

Application	Identifier	Proposed Status
Roundup Xtend 2 Premix, M1833 Herbicide (Ethanolamine Salt)	Submission ID: RD 1833	Prioritize. Latest PRIA date is 12/31/2019; submitted on 6/29/2017
M1834 Dicamba MUP (Ethanolamine Salt)	Submission ID: RD 1834	Prioritize. Latest PRIA date is 12/31/2019; submitted on 6/29/2017
Roundup Xtend 1 Premix, M1769 Herbicide, Uses on HT Soy and HT Cotton	Pending over the top use of EPA Reg. 524-616 on HT Soy and HT Cotton	withdraw
Warrant Dicamba Premix, AD2611 Herbicide	Submission No. RD 1827	withdraw
M1691, uses on HT Soy and HT Cotton	Pending over the top use of EPA Reg. 524-582 on HT Soy and HT Cotton.	withdraw
XtendiMax 2, M1832 Herbicide (Ethanolamine Salt)	Submission No. RD 1832	Renegotiate PRIA, which expires on 12/31/2019
XtendiMax 1, M1768 Herbicide, Use on HT Corn	Submission No. RD 1784; pending over the top use of 524-617 Herbicide on HT Corn.	Renegotiate PRIA, which expires on 12/31/2019

Tom Marvin
Head of Regulatory Science North America

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Bayer Crop Science
801 Pennsylvania, NW
Washington, DC, USA
Tel: +1 202-383-2851
Cell: +1 202-676-7846

From: MARVIN, THOMAS [AG/1920]
Sent: Thursday, August 08, 2019 9:04 AM
To: Kenny, Daniel <Kenny.Dan@epa.gov>; MARVIN, THOMAS [AG/1920] <thomas.marvin@bayer.com>
Subject: RE: Invora

Thanks Dan, we will discuss and get back to you soon with our proposed priorities.

Tom Marvin
Head of Regulatory Science North America

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Bayer Crop Science
1300 I Street, NW
Suite 450 East
Washington, DC, USA
Tel: +1 202-383-2851
Cell: +1 202-676-7846

From: Kenny, Daniel [mailto:Kenny.Dan@epa.gov]
Sent: Thursday, August 08, 2019 7:55 AM
To: MARVIN, THOMAS [AG/1920] <thomas.marvin@bayer.com>
Subject: RE: Invora

Thanks again for your help with this, Tom. When I sent this, I forgot to also ask you about the status of the dicamba premix applications. We are trying to organize our workload and strategize an approach on the various premixes, and remembered that Bayer had indicated that there were some applications that they were willing to withdraw. Because these applications take more resources than usual to complete and because we don't want to spend those resources on applications that aren't actually needed, did you still intend to withdraw any of those? We'd rather spend the time on those that are still important to the applicants.

Let me know what you think, and we'll organize accordingly.

Thanks very much,
Dan

Daniel Kenny, Chief
Herbicide Branch
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency

From: MARVIN, THOMAS [AG/1920] <thomas.marvin@bayer.com>
Sent: Tuesday, August 06, 2019 5:29 PM
To: Kenny, Daniel <Kenny.Dan@epa.gov>; MARVIN, THOMAS [AG/1920] <thomas.marvin@bayer.com>
Subject: RE: Invora

Dan,

Karen Shearer will send you a proposed waiver tomorrow as soon as possible. Hopefully before the afternoon. Please let me know if there are any wrinkles I can assist with. All is well here, hope the same with you and your team.

Tom

-------- Original Message --------
Subject: RE: Invora
From: "Kenny, Daniel" <Kenny.Dan@epa.gov>
Date: Aug 6, 2019, 4:59 PM
To: "MARVIN, THOMAS [AG/1920]" <thomas.marvin@bayer.com>
Thanks Tom.

Daniel Kenny, Chief
Herbicide Branch
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency

From: MARVIN, THOMAS [AG/1920] <thomas.marvin@bayer.com>
Sent: Tuesday, August 06, 2019 4:51 PM
To: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: Re: Invora

Hi Dan. I'll get back to you shortly on this.

-------- Original Message --------
Subject: Invora
From: "Kenny, Daniel" <Kenny.Dan@epa.gov>
Date: Aug 6, 2019, 4:33 PM
To: "MARVIN, THOMAS [AG/1920]" <thomas.marvin@bayer.com>
Hi Tom. I hope all is well. I don't know if you are planning to attend the workshop on Thursday with the ranchers from Texas to discuss Invora, but it has occurred to us here at EPA that, if we are indeed going to participate, we need to have Bayer waive the pre-registration confidentiality for that application. I don't know of any template that exists for that, so I would leave it up to Bayer, but based on discussions today, it appears that it will be difficult for us to participate without it. Can you or someone authorized to waive the confidentiality email me a letter to such end? Of course, no waiver is needed for CBI such as the CSF components, just the pre-registration confidentiality that protects against sharing information about the application to competitors. If you can help with this, we need something before the workshop, preferably today or tomorrow. If this is not something that you can help with, can you point me in the correct direction?

Thanks for your help,
Dan Kenny

Daniel Kenny, Chief
Herbicide Branch
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency

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