Message (Digitally Signed)

**From:** George Sabbagh [george.sabbagh@bayer.com]
**Sent:** 10/16/2020 7:43:17 PM
**To:** Hathaway, Margaret [Hathaway.Margaret@epa.gov]
**CC:** Kenny, Daniel [Kenny.Dan@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]; Jeffrey H Birk [jeffrey.birk@basf.com]; Dixon Monty USGR [monty.dixon@syngenta.com]; Steven Callen [steven.callen@bayer.com]; BCSReg_Archive [esepamailbox@bayer.com]
**Subject:** RE: Protocol: Volatility Reducing Agent Qualification
**Attachments:** VRA-protocol_20201016_redline.pdf; VRA-protocol_20201016.pdf; ATPFile_CE6EEE48-3663-4393-AEBB-9A55F7C1723F.token; smime.p7s

Hi Meg,

Attached please find an updated VRA protocol that captures the revisions that EPA proposed.

Also attached is a copy of the document that can be used to track the revisions made (VRA..._redline.pdf).

The document is being submitted on behalf of the 3 registrants (BASF, Bayer and Syngenta)

Please, let me know if you need additional information.

Freundliche Grüße / Best regards,

*George Sabbagh, Ph.D.*
*Head Regulatory Engagements*

Regulatory Engagement
Collaborating Across Organizations

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**From:** Hathaway, Margaret <Hathaway.Margaret@epa.gov>
**Sent:** Tuesday, October 13, 2020 2:48 PM
**To:** George Sabbagh <george.sabbagh@bayer.com>
**Cc:** Kenny, Daniel <Kenny.Dan@epa.gov>; Dixon Monty USGR <monty.dixon@syngenta.com>; Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
**Subject:** RE: Protocol: Volatility Reducing Agent Qualification

Hello George:
Please see the attached document for EPA's comments on the proposed protocol document. Please update accordingly and submit a revised protocol as soon as possible.

Best regards,

Margaret Hathaway (Meg)
Senior Regulatory Specialist
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs
Registration Division – Herbicide Branch
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**From:** George Sabbagh <george.sabbagh@bayer.com>
**Sent:** Tuesday, October 06, 2020 3:22 PM
**To:** Kenny, Daniel <Kenny.Dan@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
**Cc:** Dixon Monty USGR <monty.dixon@syngenta.com>; Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; BCSReg_Archive <esepamailbox@bayer.com>
**Subject:** Protocol: Volatility Reducing Agent Qualification

Hello Meg and Dan,

Attachment is the proposed protocol for identifying qualified volatility reducing buffer agent. It is being submitted on behalf of the 3 registrants BASF, Bayer and Syngenta (Registrants). This protocol follows the same format for the wind tunnel testing.

We are proposing this to be a self-certification process, whereby Registrants generate the data and post qualifying products on the web site. The Registrants will pass the data to the Agency when requested. Also, we are proposing that third party would need to generate the data and provide to EPA. The Agency will review the data and inform the registrant to post on website.

Please, let me know if you have questions or need further information.

Freundliche Grüße / Best regards,

*George Sabbagh, Ph.D.*
*Head Regulatory Engagements*
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