Message

From: Goodis, Michael [Goodis.Michael@epa.gov]
Sent: 8/21/2019 4:22:22 PM
To: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
CC: Johnson, Marion [Johnson.Marion@epa.gov]; Davis, Donna [Davis.Donna@epa.gov]
Subject: Re: Aldicarb registration on citrus

Marion

I believe the team is planning to do a quickish dietary run to see if will pass or not. Do have a schedule on when that will be done?

Sent from my iPhone

On Aug 15, 2019, at 10:47 AM, Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov> wrote:

> Marion – let's confer with Mike next week – but can you begin to work up how we might respond/support Rick on this. Ex. 5 Deliberative Process (DP)
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>
> **From:** Keigwin, Richard
> **Sent:** Thursday, August 15, 2019 9:15 AM
> **To:** Goodis, Michael <Goodis.Michael@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>
> **Subject:** FW: Aldicarb registration on citrus
>
> Just FYI at this point, Ex. 5 Deliberative Process (DP)
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> **From:** Bennett, Tate <Bennett.Tate@epa.gov>
> **Sent:** Tuesday, August 13, 2019 10:22 AM
> **To:** Dunn, Alexandra <dunn.alexandra@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
> **Cc:** Bolen, Derrick <bolen.derrick@epa.gov>; Mills, William T. <mills.williamt@epa.gov>
> **Subject:** FW: Aldicarb registration on citrus
>
> Hello! See below from Texas and Florida mutual on aldicarb Sec. 3 request. Just wanted to give you all some context as to why I asked Derrick if we could get a quick update at OPP general. If the schedule is too full today (I know there is a lot on your plates), I'm open to a separate briefing or call soon. Up to you all. I think they would like to know whether or not they will be able to spray THIS winter, which is why they'd like a decision sooner than next year. New to the issue but that was my take.
>
> **From:** Joe Bischoff <JBischoff@cgagroup.com>
> **Sent:** Tuesday, August 13, 2019 10:10 AM
> **To:** Bennett, Tate <Bennett.Tate@epa.gov>
> **Cc:** Dale Murden <dalemurden@hotmail.com>; Matt Joyner <MattJ@flcitrusmutual.com>
> **Subject:** Aldicarb registration on citrus
>
> Tate,

I'm emailing on behalf of Texas Citrus Mutual and Florida Citrus Mutual (both cc'd here) requesting an update regarding the 15 GG aldicarb new use registration submitted by AgLogic in February, 2019. The Section 3 request would add Florida and Texas citrus to the aldicarb label.

As you are aware, the Florida and Texas citrus industries have been devasted by the Asian citrus psyllid (ACP) and the disease it vectors, citrus greening (Huanglongbing). While we are actively supporting and heavily investing in research to overcome this complex challenge, solutions are still years off and citrus growers need every possible and appropriate tool at their disposal to grow a healthy and productive crop. If the citrus industry falters before disease resistant trees are available, we will have lost the family farms and associated infrastructure and thus, lost the industry.

Aldicarb was unique in that it consistently increased citrus grower yields and promoted greater tree health by controlling multiple citrus pests, including ACP, rust mites and nematodes. The citrus industry has a long and successful history of safely using aldicarb going back to 1992 and up until Bayer voluntarily cancelled the registration on all crops and exited the market in 2010. It was difficult to lose such an effective tool, particularly when the impacts of the psyllid were just being fully realized.

We recently learned that EPA provided a PRIA date of June, 2020 for the new Section 3. However, aldicarb can only be applied from October 15 to April 15 and a June, 2020 decision would mean that an application would not be possible for the entire 2020 crop season. We are hopeful that EPA can take steps to expedite the assessments and complete them by the end of 2019. We believe this should be possible because EPA completed an interim registration review decision of aldicarb in February, 2018 and citrus already has an approved tolerance.

Any information updating us on the registrations progress would be greatly appreciated.

Thank you and please let know if you have any questions.

Regards,
Joe

Cc: Dale Murden, President, Texas Citrus Mutual
Matt Joyner, Director of Government Relations, Florida Citrus Mutual

Joseph Bischoff PhD | Senior Vice President
<image002.jpg>
Annapolis | Atlanta | Austin | Baton Rouge | Chicago
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