Message

From: Keigwin, Richard [Keigwin.Richard@epa.gov]
Sent: 4/4/2019 4:43:07 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Davis, Donna [Davis.Donna@epa.gov]
Subject: Fwd: Letter from AAPCO BOD: Concerns regarding the notification: Guidance on FIFRA 24(c) Registrations
Attachments: AAPCO 24(c) Letter Final April 4 2019.pdf; ATT00001.htm

Flag: Follow up

FYI

Thanks for the public comment options. We need to develop a timeline and milestones for getting the draft guidance out for public comment. **Deliberative Process / Ex. 5**

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

Begin forwarded message:

> **From:** Rose Kachadoorian <rkachadoorian@oda.state.or.us>
> **Date:** April 4, 2019 at 10:20:36 AM EDT
> **To:** "Keigwin, Richard" <Keigwin.Richard@epa.gov>
> **Cc:** Leo Reed <reedla@purdue.edu>, Derrick Lastinger <derrick.lastinger@agr.georgia.gov>, "Jones, Patrick" <patrick.jones@ncagr.gov>, Cary Giguere <Cary.Giguere@vermont.gov>, Megan Patterson <Megan.L.Patterson@maine.gov>, Liza Fleeson <Liza.Fleeson@vdacs.virginia.gov>, "tdrake@clemson.edu" <tdrake@clemson.edu>, "GBahr@agr.wa.gov" <GBahr@agr.wa.gov>, Jeffrey Rogers <jeffrey.rogers@vdacs.virginia.gov>, Amy Sullivan <aapco.sfireg@gmail.com>
> **Subject: Letter from AAPCO BOD: Concerns regarding the notification: Guidance on FIFRA 24(c) Registrations**
>
> Rick,
>
> Attached is a letter provided to the US EPA by the AAPCO Board of Directors (BOD), on behalf of the members of AAPCO.
>
> This letter concerns the notification posted on the Guidance on FIFRA 24(c) Registrations website on 03/19/19. According to the notification, EPA is now re-evaluating its approach to reviewing 24(c) requests and the circumstances under which it will exercise its authority to disapprove those requests.
>
> The AAPCO BODs considers the Section 24(c) process to be currently highly functional, and protective of non-target plants and the environment.
>
> We look forward to working with our EPA partners on this very important issue.
>
> Sincerely,

Rose Kachadoorian
AAPCO President
Pesticides Program Manager,
Registration, Licensing and Certification
Natural Resource Policy Area
Oregon Department of Agriculture
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