Message

From: Laws, Meredith [Laws.Meredith@epa.gov]
Sent: 11/6/2019 4:59:57 PM
To: Borges-Silva, Quentin [Borges-Silva.Quentin@epa.gov]
CC: Eagle, Venus [Eagle.Venus@epa.gov]
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics
Attachments: Treated Seed Petition response_11_05_19_mam_mmg. QB clean.mL.docx

Oooh, sorry…

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Wednesday, November 06, 2019 11:10 AM
To: Laws, Meredith <Laws.Meredith@epa.gov>
Cc: Eagle, Venus <Eagle.Venus@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Thanks!

Can you send me the Word doc with your comments? ☺

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Laws, Meredith <Laws.Meredith@epa.gov>
Sent: Wednesday, November 6, 2019 10:47 AM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Cc: Eagle, Venus <Eagle.Venus@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Hi Quentin – I made one minor comment to question 5. I don't have any other comments or edits.

Thanks for checking with us.

Meredith

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Wednesday, November 06, 2019 10:11 AM
To: Laws, Meredith <Laws.Meredith@epa.gov>
Cc: Eagle, Venus <Eagle.Venus@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics
Importance: High

Good morning!

Can you quickly review the attached and let me know if you concur. PRD, OGC and EFED have already commented. It's due to OPA by 4pm but still has to clear OPP IO and OCSPP.

Thanks!

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Wednesday, November 6, 2019 9:00 AM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Quentin,

Attached is the version that I worked up last night that is a combo of the responses from OGC and EFED and PRD. Dana reviewed this version this morning and sent it to Elissa for her review. She will be taking a look at it soon.

Thanks,
Melissa

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Tuesday, November 05, 2019 5:40 PM
To: Grable, Melissa <Grable.Melissa@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Perfect. Thx!

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Tuesday, November 5, 2019 5:39 PM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Thanks, Quentin. I was getting ready to send our response, but I will incorporate our response with what you sent. If we have until 9 am tomorrow, we will let Dana weigh in tomorrow to see if she has additional edits.

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Tuesday, November 05, 2019 5:30 PM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Hi again.

The attached Word doc reflects Bob Perlis's edits and comments and Keith Sappington's edits to the draft responses to Bloomberg. Feel free to use this for your edits. Please try to get them to me by 9am.

Thx
Q

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Snyderman, Steven <Snyderman.Steven@epa.gov>
Sent: Tuesday, November 5, 2019 4:24 PM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Sounds good Quentin, thank you for your patience. We're compiling a more thorough list of comments now and will get back to you as soon as we can.

Steven Snyderman, Chemical Review Manager
Pesticide Re-evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
Snyderman.Steven@epa.gov
(703) 347-0249

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Tuesday, November 05, 2019 4:12 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Thanks everybody.

I'm holding on the response. I never send them up without relevant division concurrence…I just nag more as my deadline approaches. ☺

Bob Perlis (OGC) will be sending his comments to me shortly. Keith Sappington has already chimed in for EFED, but I'm still waiting for Justin H and Tom S's contributions.

As you edit the responses, please keep in mind that OPA usually only sends out short answers (generally 3~4 sentences). If you've ever seen "science" articles on Bloomberg, that's the sort of English OPA likes to see in our responses (hence my **Deliberative Process / Ex. 5** characterization). But if you have a better idea for responding to his concern about pesticide overuse with treated seed, feel free to edit away.

Thx
Q

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Mannix, Marianne <Mannix.Marianne@epa.gov>
Sent: Tuesday, November 5, 2019 2:54 PM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>; Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>; Grable, Melissa <Grable.Melissa@epa.gov>
Cc: Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Looping in RMIB1's other TL, Melissa who also received this inquiry and is working on a response.

Quentin – to echo Steven's in his previous email, please hold until you hear from Melissa (acting BC today).

Marianne A. Mannix
Acting Team Leader, Risk Management and Implementation Branch 1
Pesticide Re-evaluation Division
U.S. EPA Office of Pesticide Programs
(703) 347-0275

From: Snyderman, Steven <Snyderman.Steven@epa.gov>
Sent: Tuesday, November 05, 2019 2:25 PM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Cc: Mannix, Marianne <Mannix.Marianne@epa.gov>; Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: RE: Press responses for your immediate review: BNV - Treated Seeds/neonics

Quentin,

Please wait for the rest of our team, specifically our team leader Marianne, prior to proceeding but this all looks generally fine to me. The one comment I have is your response to question 5 where you state,

Ex. 5 Deliberative Process (DP)

Thank you for your work on this and please feel free to let us know if you have any additional questions should they arise.

Steven Snyderman, Chemical Review Manager
Pesticide Re-evaluation Division

Office of Pesticide Programs
Environmental Protection Agency
Snyderman.Steven@epa.gov
(703) 347-0249

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Tuesday, November 05, 2019 2:07 PM
To: Snyderman, Steven <Snyderman.Steven@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Khan, Matthew <khan.matthew@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Subject: Press responses for your immediate review: BNV - Treated Seeds/neonics
Importance: High

Hi.

Please review and edit if necessary my draft responses below to this Bloomberg reporter's questions on treated seed and neonics. Connie Hernandez (FEAD) is reviewing concurrently in a separate thread, since she has the lead on the treated article petition. I'm also reaching out to EFED's neonic team for comments/concurrence, specifically for Q4 &5.

This is due out of OCSPP IO around noon tomorrow, so please try to get your comments/concurrence back to me by 4pm today. If you can indicate PRD IO concurrence, too, that'd be helpful.

Thanks,

Quentin Borges-Silva
EPA's Office of Pesticide Programs
"Protecting Human Health & the Environment"

From: Daguillard, Robert <Daguillard.Robert@epa.gov>
Sent: Tuesday, November 5, 2019 9:05 AM
To: OPP FEAD CSB <OPP_FEAD_CSB@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: OPP - BNV - Treated Seeds

BNV
ADAM ALLINGTON
DDL WEDNESDAY 6 NOVEMBER

Good morning all,

Should we talk about how to handle this inquiry? Should we loop ORD in at any stage?

Thanks, R.

++++++++++++++++++++++++++++++++++++

Hello Robert,

I hope all is well at your end.

So, I'm been working on investigative story about EPA's regulation of pesticide seed treatments for awhile. I now am in a position where I can present you with a complete list of the questions I have. Given the complexity and the amount of questions I have, I would ideally like to conduct a phone interview, both so I have the chance to completely understand the nature of the answers, but

also have an opportunity to ask individual follow ups questions based on the responses. AND also to ensure EPA has the chance to adequately defend any specific criticisms from other groups.

I think we could address most of these questions in a 15-20 minute phone call.

Some of the questions I have are as follows:

1. A number of scientists, and environmental groups say that treated seeds treated seeds fit the legal definition of and are explicitly marketed as pesticides, and therefore should be regulated under FIFRA. What is the Agencies position? Do treated seeds not meet the bar to be considered pesticides?

EPA response: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

2. Has the dramatic increase in the use of pesticide coated seeds over the last decade indicate that it may be time to revisit the treated article exemption, which currently exempts treated seed from registration and labeling requirements?

EPA response: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

3. Some also claim that pesticide-coated seeds possess unique pesticidal and environmental fate properties that must be regulated under FIFRA to ensure adequate protection of the environment and public health. If EPA disagrees, what steps have they taken to ensure adequate protections from the specific risks posed by seed-coatings?

EPA response: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

4. There is an increasing body of scientific studies that are pointing to broader environmental impacts of from neonic-coated seeds (besides pollinators). Is this something that is concerning from a risk analysis POV? Is EPA factoring these new studies into the re-registration review for neonics?

EPA response: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

5. Is there any concern that the massive use of treated seeds (particularly corn, soybeans and wheat) have led to the overuse of pesticides, and that this might exacerbate problems such as endangered species exposure, or weed resistance?

EPA response: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Again, I know these aren't cut-and-dry type answers. If you'd prefer to answer each individual questions directly via email, that is fine with me. But, as I said, a phone call with the relevant subject matter expert seems like it might be the easiest. I'm shooting to have responses for this by COB on Wednesday.

Many thanks, Robert.

Best,
Adam

: : : : : : : : : : : : : : : : : :

Adam Allington
Chemicals and Pesticides Reporter

Bloomberg Environment

Desk: 703-341-5692
Mobile: 703-927-5278
aallington2@Bloomberg.net