Message

From: Williams, Jonathan R. [williams.jonathanr@epa.gov]
Sent: 11/26/2019 7:49:37 PM
To: Borges-Silva, Quentin [Borges-Silva.Quentin@epa.gov]
CC: Zinn, Nicole [Zinn.Nicole@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]
Subject: RE: For your immediate review: neonic PID communications
Attachments: Neonic PID Desk Statement 11.22 after RMIB II.docx

Good afternoon Quentin,

I am very sorry not to have gotten these comments back to you sooner. We have only a few small comments, though, so I hope that this does not derail your timeline. Please let us know if there are any questions.

Best,
Jon

From: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Sent: Friday, November 22, 2019 1:48 PM
To: Williams, Jonathan R. <williams.jonathanr@epa.gov>
Cc: Zinn, Nicole <Zinn.Nicole@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>
Subject: For your immediate review: neonic PID communications

Hi Jon.

The attached desk statement, Qs & As, and tweets reflect input from you, BEAD, and the N-S neonic team. The intended audience of the desk statement and tweets is your average beat reporter who doesn't know much about the neonics beyond what you might see in the news. Please keep that in mind as you review or edit. There are some 'hooks' I've included that, I hope, will catch the attention of reporters. The hooks might bother you if you read them as a regulatory risk manager, and you also might be tempted to add technical details/caveats. All I ask is that you keep the target audience in mind before you make any changes. **Deliberative Process / Ex. 5**

Deliberative Process / Ex. 5

Now for the bad news: my deadline as of right now is November 27, which means I need your edits/concurrence by COB Monday. Once I compile branch-level comments from PRD, RD, BEAD, and EFED, I need to send them out for DD review on Tuesday. I realize this is likely an impossible expectation, and I have pointed out to my supervisor that many key people have been unavailable this week and won't be in the office next week. He's not budging on my due date though, so I can only do my best to meet his deadline.

Let me know if you have any questions.

Thanks,

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

From: Williams, Jonathan R. <williams.jonathanr@epa.gov>
Sent: Wednesday, November 20, 2019 3:47 PM
To: Borges-Silva, Quentin <Borges-Silva.Quentin@epa.gov>
Cc: Zinn, Nicole <Zinn.Nicole@epa.gov>; Costello, Kevin <Costello.Kevin@epa.gov>
Subject: Acetamiprid Fact Sheet

Hi Quentin,

Thank you for stopping by to discuss acetamiprid today attached you will find the fact sheet that we prepared for the AA. I think the crux of the potential media focus on acetamiprid is summarized under the Key Point section:

> "Acetamiprid is associated with the N-S neonicotinoids, which are themselves of high profile because of their associated risks to non-target insects, including honey bees."

I would also direct your attention to the final points under the Communications section.

I am sure that you are aware of the sensitivity, but I must underscore that **potential mitigation measures should not be shared outside of the agency before publication of the PID**. Moreover, this document is intended for internal circulation only.

The risks assessments for this case have been published, but we have incorporated new data since their publication, particularly the Raby/University of Guelph data on neonic toxicity to aquatic invertebrates. These data increased our estimates of toxicity to aquatic invertebrates for acetamiprid, but did not ultimately affect the larger risk picture or our mitigation proposals. Deliberative Process / Ex. 5

Deliberative Process / Ex. 5

Finally, I understand that our website indicates a neonic PID publication date in early January. As discussed, that is our plan for this case as well.

Please contact me with any questions. I look forward to seeing a copy of the document that you are preparing for communications purposes. I have included Nicole Zinn the PRD team lead on this case and Kevin Costello, the branch chief. Note that Nicole will be out of town for the rest of the month.

Best wishes,
Jon

Jonathan R Williams
Chemical Review Manager
Pesticide Re-Evaluation Division RMIB II
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
williams.jonathanr@epa.gov
703-347-0670