Message

From: Sankula, Sujatha [Sankula.Sujatha@epa.gov]
Sent: 6/3/2021 8:18:31 PM
To: Garber, Kristina [Garber.Kristina@epa.gov]
Subject: FW: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Kris

Looks like you are off the hook on this one. Justin is covering this I heard. Please see below.

From: Kyprianou, Rose <Kyprianou.Rose@epa.gov>
Sent: Thursday, June 03, 2021 4:14 PM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>
Cc: Steeger, Thomas <Steeger.Thomas@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Subject: RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

FYI, looping in Sujatha so that we're all in the same thread and the same page.

Rose Kyprianou, Acting Deputy Director
Environmental Fate and Effects Division
OPP/OCSPP/EPA
Phone: (703)-305-5354

From: Kyprianou, Rose
Sent: Thursday, June 3, 2021 4:12 PM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>
Cc: Steeger, Thomas <Steeger.Thomas@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Housenger, Justin <Housenger.Justin@epa.gov>
Subject: RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Sandra,

Most of the yellow highlighted questions (i.e., the first 4) are not EFED questions. EFED could come and provide a ~5 minute overview of how ecological risk assessment is done on seed treatment and then be there to answer questions. Justin Housenger is available to come to the meeting to do this. Will this work?

Rose

Rose Kyprianou, Acting Deputy Director
Environmental Fate and Effects Division
OPP/OCSPP/EPA
Phone: (703)-305-5354

From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Thursday, June 3, 2021 2:47 PM

To: Kyprianou, Rose <Kyprianou.Rose@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>
Cc: Steeger, Thomas <Steeger.Thomas@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Thanks, Rose. The EFED POC ask for this issue has been informally raised in previous discussions. This is to make the ask more formal and so EFED management can decide what level of resources to commit here.

Does this help clarify?

Sandra O'Neill
919 323 7926

From: Kyprianou, Rose <Kyprianou.Rose@epa.gov>
Sent: Thursday, June 3, 2021 2:40 PM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>
Cc: Steeger, Thomas <Steeger.Thomas@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Hi Sandra,

I'm looking into it. I know Jean/others were in contact with you prior to this. Is this ask beyond what you all have talked about previously?

Rose

Rose Kyprianou, Acting Deputy Director
Environmental Fate and Effects Division
OPP/OCSPP/EPA
Phone: (703)-305-5354

From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Thursday, June 3, 2021 1:33 PM
To: Matuszko, Jan <Matuszko.Jan@epa.gov>; Kyprianou, Rose <Kyprianou.Rose@epa.gov>
Cc: Steeger, Thomas <Steeger.Thomas@epa.gov>; Holmes, Jean <Holmes.Jean@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: FW: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Hi Jan and Rose,

I'm looping you into a conversation that's taking place on neonic treated seeds. This is a topic that will be discussed on Tuesday, June 1st from 3:25-3:50 PM at next week's SFIREG meeting. It was initially parked in PRD's corner as there are a number of neonic/treated seeds petitions in house that they are reviewing with OGC. Since then, SFIREG has sent some questions that may fall into EFED's expertise area and I wanted to share these with you to see if EFED would be available to attend/participate in the neonic treated seeds discussion next week?

PRD and OGC met earlier this week, the yellow highlighted questions were thought to be possible EFED questions. Some of these also overlap with USDA, so may not be for OPP:

SFIREG Questions for EPA:
- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
-When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
---If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed? **With respect to ecological risk and pending EFED management input, EFED could provide a response.**

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

For reference, I'm also providing the Neonic Treated Seeds session description below:

3:25 pm **Neonicotinoid Treated Seed Issues**

- *State Lead Agencies will discuss Issues with Neonicotinoid Treated Seeds. Topics that have been come up, status of treated seed management and regulation.* [SFIREG Representatives, Linda Arrington, EPA/OPP/PRD]

Many thanks for your review of the issue and please let me know if I can answer any questions.

Best,

Sandra O'Neill
AAPCO/SFIREG Project Officer and EPA Region and State Liaison
Environmental Protection Agency
Office of Chemical Safety and Pollution Prevention
Office of Program Support
Mission Support Division
Intergovernmental & Community Relations Branch
919 323 7926

From: Steeger, Thomas <Steeger.Thomas@epa.gov>
Sent: Tuesday, June 1, 2021 7:45 PM
To: ONeill, Sandra <ONeill.Sandra@epa.gov>
Cc: Holmes, Jean <Holmes.Jean@epa.gov>
Subject: RE: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg

Sandra

Following through on today's meeting and with respect to the questions posted in the invite, the last question could be addressed by EFED (provided EFED management agrees). The last sentence though (highlighted in yellow) also pertains to EFED with respect to evaluating potential risks to pollinators from neonicotinoid-treated seed. EFED management would have to identify the appropriate staff member.

Tom Steeger

-----Original Appointment-----
From: ONeill, Sandra <ONeill.Sandra@epa.gov>
Sent: Tuesday, May 25, 2021 9:28 AM
To: ONeill, Sandra; Arrington, Linda; Friedman, Dana; Costello, Kevin; Sappington, Keith; Olinger, Christine; Huskey, Angela; Knorr, Michele; Bartow, Susan; Javier, Julie; Muhammad, Maryam K.; Gavin, Quinn; Colby, Deanna; Steeger, Thomas; Aranda, Amber; Swartz, Christina
Cc: Hopkins, Yvette; Picone, Kaitlin; Emdur, Zoe; Koch, Erin
Subject: Neonic Treated Seeds Topic: 6/8 Full SFIREG Mtg
When: Tuesday, June 1, 2021 12:00 PM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Greetings all,

The purpose of this meeting is to prepare for the Neonicotinoid Treated Seed Issues session at the Full SFIREG June 8 meeting. SFIREG's questions for this session are below. We want to make sure we have the right group of people to weigh in on the questions. Please feel free to forward to any that should be included.

SFIREG Questions for EPA:
- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
-When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
---If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed? **With respect to ecological risk and pending EFED management input, EFED could provide a response.**

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Thanks and please let me know if you have any questions.
Best,
Sandra O'Neill

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