Message

From: Coy, Murphey (Richard) [coy.richard@epa.gov]
Sent: 1/4/2021 1:24:22 PM
To: Tindall, Kelly [tindall.kelly@epa.gov]; Harty, Thomas [harty.thomas@epa.gov]; Wyatt, TJ [Wyatt.Tj@epa.gov]; McFarley, Heather [McFarley.Heather@epa.gov]; Sells, Dexter [Sells.Dexter@epa.gov]; Lee, Andrew [Lee.Andrew@epa.gov]; Hanson, Charmaine [Hanson.Charmaine@epa.gov]; Mallampalli, Nikhil [Mallampalli.Nikhil@epa.gov]; Smearman, Stephen [Smearman.Stephen@epa.gov]; Paisley-Jones, Claire [Paisley-Jones.Claire@epa.gov]; Otte, Briana [otte.briana@epa.gov]; Hendrick, Lindsey [hendrick.lindsey@epa.gov]
Subject: RE: Neonic RTC questions
Attachments: NRDC EPA-HQ-OPP-2008-0844-1832 Comment (27).pdf

Hey I guess I am about a week late to this conversation. It appears that NRDC submitted multiple comments on multiple dockets (specific comment I was interested in is attached and linked below). The submitted materials within dockets are not always the same. On docket EPA-HQ-OPP-2008-0844-1832, NRDC submitted a 40 page comment. This comment specifically mentioned/called out the AgInfomatics as well as BEAD assessments (pg 19, 23-24, 36, 39), more specifically on turf and ornamentals. The comment then goes on to detail 4 shortcomings of the AgInfo reports and why EPA cannot rely/use registrant funded studies, etc. While I disagree **Deliberative Process / Ex. 5**
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myself available if PRD needs to respond. Have a nice day and happy (belated) new year.
https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0844-1832

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From: Tindall, Kelly <tindall.kelly@epa.gov>
Sent: Wednesday, December 30, 2020 4:05 PM
To: Harty, Thomas <harty.thomas@epa.gov>; Wyatt, TJ <Wyatt.Tj@epa.gov>; McFarley, Heather <McFarley.Heather@epa.gov>; Sells, Dexter <Sells.Dexter@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Coy, Murphey (Richard) <coy.richard@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Otte, Briana <otte.briana@epa.gov>; Hendrick, Lindsey <hendrick.lindsey@epa.gov>
Subject: RE: Neonic RTC questions

Thanks Tom – I had a little free time today, so I took a quick look at it…

There is a corn, soy and wheat (with a fair amt about seed treatments), fruits (apples and tree fruits, grapes, berries), vegetables (cabbage and brassica, potatoes, snap bean, sweet corn, cucurbits), ornamentals (outdoor ornamentals, commercial turf, home owners), and forestry (invasive pests). For each site, they talk specific target pests and define alternatives based on extension, so their list may be longer – but definite overlap. They did a lit review of studies for each crop that had non-neonic alternative. A quick review, looks like it shows X% of studies show neonics better, worse than, the same as alternatives (and sometimes a non-treated check). Looks like there is only "cost effectiveness" for corn and soy (and it may be largely seed treatment related).

- Corn and soy – primarily seed trt related; soy foliar apps – neonics (excluding acetamiprid) may not be the best choice

- Fruits – *"There are non-neonicotinoid products from multiple insecticide families available for other major pests of fruit, though removing neonicotinoids from insecticide rotations would, to varying degrees, increase the cost and complexity of pest management."*
- Vegetables - point out at least one pest, Swede midge on cabbage, that doesn't have good alternatives. There are some examples (Colorado potato beetle) of how neonics are good for resistance management. Seed trt can be important for snap bean and sweet corn (can be higher yields than many alternatives)
  - Deliberative Process / Ex. 5
- Ornamentals – important for several important pests; no alternatives for woolly adelgids for ornamental hemlock. *"Shifting from nitroguanidine neonicotinoids to acetamiprid where feasible could permit pesticide users to retain the benefits of neonicotinoids' mode of action with less risk to pollinators and beneficial insects."* Turf: *"Aside from chlorantraniliprole, there are no effective alternatives to imidacloprid for preventive white grub control on turfgrass, though pyrethroids are commonly used for curative treatments."*
- Forestry: *"no immediate alternative to imidacloprid and dinotefuran for chemical control of hemlock woolly adelgid…imidacloprid is the mainstay of quarantine and eradication efforts for Asian longhorned beetle"*

So for the use sites that we have memos for, it is likely a "largely agree, thank you" - response. The others that don't have memos are similar in that tho we didn't assess the site specifically, the agency recognizes value on neonics.

I didn't really see anything about concerns over any of the mitigations other than the blurb that I posted above about cucurbits.

Based upon my *quick* review, Deliberative Process / Ex. 5

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Let me know if you have any questions

Kelly

Side note/interesting tid-bit – for the home owner section – they talk about how pesticides are sold on Amazon and delivered to those counties in NY where certain pesticides aren't allowed and how pesticide enforcement isn't easy.

From: Harty, Thomas <harty.thomas@epa.gov>
Sent: Wednesday, December 30, 2020 12:10 PM
To: Wyatt, TJ <Wyatt.Tj@epa.gov>; McFarley, Heather <McFarley.Heather@epa.gov>; Sells, Dexter <Sells.Dexter@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>; Coy, Murphey (Richard) <coy.richard@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Otte, Briana <otte.briana@epa.gov>; Hendrick, Lindsey <hendrick.lindsey@epa.gov>
Subject: RE: Neonic RTC questions

Hi Tj,

I'm not 100% sure, but I think early on an issue I identified for PRD was that they didn't actually include a comment which contained this study. Several commenters reference this assessment/study but I am not sure it was included in the PRD spreadsheet. Anyway I've attached the study from Cornell's website.

Thanks,
Thomas

From: Wyatt, TJ <Wyatt.Tj@epa.gov>
Sent: Wednesday, December 30, 2020 12:01 PM
To: Harty, Thomas <harty.thomas@epa.gov>; McFarley, Heather <McFarley.Heather@epa.gov>; Sells, Dexter <Sells.Dexter@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>; Coy, Murphey (Richard) <coy.richard@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Otte, Briana <otte.briana@epa.gov>; Hendrick, Lindsey <hendrick.lindsey@epa.gov>
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Thanks, Tom, for staying focused!

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Would someone please circulate a copy of the Cornell study? It seems like we need to review. Will probably need to discuss with the BCs to determine who has the time to do so.

From: Harty, Thomas <harty.thomas@epa.gov>
Sent: Wednesday, December 30, 2020 10:38 AM
To: McFarley, Heather <McFarley.Heather@epa.gov>; Sells, Dexter <Sells.Dexter@epa.gov>; Wyatt, TJ <Wyatt.Tj@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>; Coy, Murphey (Richard) <coy.richard@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Otte, Briana <otte.briana@epa.gov>; Hendrick, Lindsey <hendrick.lindsey@epa.gov>
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Hi Heather,

I can answer a few of these.

- The NRDC comment is largely a risk assessment methodology and mitigation based comment Deliberative Process / Ex. 5

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- I have summarized the comments addressing forestry, its possible that those unaddressed in the excel sheet are actually repeats submitted to different chemical dockets that for whatever reason don't sort together in the PRD spreadsheet so I may have already summarized these comments.
- Anything that has "Tom is summarizing" in the BEAD thoughts column, I've summarized.

Thanks,
Thomas

From: McFarley, Heather <McFarley.Heather@epa.gov>
Sent: Wednesday, December 30, 2020 10:17 AM

To: Sells, Dexter <Sells.Dexter@epa.gov>; Wyatt, TJ <Wyatt.Tj@epa.gov>; Harty, Thomas <harty.thomas@epa.gov>; Lee, Andrew <Lee.Andrew@epa.gov>; Hanson, Charmaine <Hanson.Charmaine@epa.gov>; Mallampalli, Nikhil <Mallampalli.Nikhil@epa.gov>; Smearman, Stephen <Smearman.Stephen@epa.gov>; Tindall, Kelly <tindall.kelly@epa.gov>; Coy, Murphey (Richard) <coy.richard@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Otte, Briana <otte.briana@epa.gov>; Hendrick, Lindsey <hendrick.lindsey@epa.gov>
Subject: Neonic RTC questions

Hello team,

I hope you are all well.

I've been reviewing the PRD excel to summarize my comments and I have a couple of questions, see below.

All

- Is someone reviewing the Cornell study mentioned in a couple of comments? Likely would be an extensive review/response
- Who's summarizing/responding to comments with no crop indicated that state 'discuss'?
- Who's summarizing/responding to the EPA-HQ-OPP-2008-0844-1832 comment from Natural Resources Defense Council (NRDC)?
- Who's summarizing/responding to the forestry comments?

Nikhil

- EPA-HQ-OPP-2011-0865-1235 regarding cranberry from Cranberry Institute. PRD tracker says 'Nikhil will summarize'. Have you already summarized or would you like me to?

Tom

- Have you summarized all of the comments in the PRD tracker that states 'Tom summarizing' or should I cross check?

Let me know. Thanks!

Have a great day,

Heather McFarley | Office of Pesticide Programs | U.S. EPA | 703.308.8119 (cell: 703.434.2427)