Message

From: Ricciardi, Rachel [Ricciardi.Rachel@epa.gov]
Sent: 11/3/2021 8:14:44 PM
To: Peterson, Steven R. [peterson.stevenr@epa.gov]
CC: Friedman, Dana [Friedman.Dana@epa.gov]; Page, Jordan [Page.Jordan@epa.gov]; Hospital, Jocelyn [Hospital.Jocelyn@epa.gov]; Perron, Monique [Perron.Monique@epa.gov]; Kramer, George [Kramer.George@epa.gov]; Picone, Kaitlin [Picone.Kaitlin@epa.gov]; Cyran, Carissa [Cyran.Carissa@epa.gov]
Subject: RE: FOR PRD INPUT: Response to EPA R1 Tribal inquiry re: glyphosate; DDL: COB Wednesday

Hi Steven,

Thank you for the follow-up glyphosate dietary risk information. We'll be sure to work with Region 1 to include this additional information in the letter.

Best,
-Rachel

From: Peterson, Steven R. <peterson.stevenr@epa.gov>
Sent: Wednesday, November 3, 2021 9:24 AM
To: Ricciardi, Rachel <Ricciardi.Rachel@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>; Page, Jordan <Page.Jordan@epa.gov>; Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Perron, Monique <Perron.Monique@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: RE: FOR PRD INPUT: Response to EPA R1 Tribal inquiry re: glyphosate; DDL: COB Wednesday

Hi Rachel,

That response to the ecological portion looks good to me. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks,

Steven R. Peterson (he/him)
Chemical Review Manager
Risk Management and Implementation Branch I
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(202) 566-2218

From: Ricciardi, Rachel <Ricciardi.Rachel@epa.gov>
Sent: Tuesday, November 2, 2021 4:36 PM
To: Peterson, Steven R. <peterson.stevenr@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>; Page, Jordan <Page.Jordan@epa.gov>; Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Perron, Monique <Perron.Monique@epa.gov>; Kramer, George <Kramer.George@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: RE: FOR PRD INPUT: Response to EPA R1 Tribal inquiry re: glyphosate; DDL: COB Wednesday

Good afternoon Steven and Carissa,

I recently responded to Region 1 (see email attached) inquiring if we would be able to incorporate our response into their letter or if they wanted us to submit a separate letter (it seemed like they wanted us to go this route), but I'm waiting for them to respond. You'll see in my email to Region 1, I let them know that I read through the Glyphosate Interim Decision and found specific risk management information on fish and mammals (below). The PID had stated that glyphosate was not a risk of concern to fish, aquatic invertebrates, or aquatic-phase amphibians, but that there were potential ecological risks of concern for mammals. I let Region 1 know that I'd most likely respond by COB Wednesday with specifics regarding risks to deer and moose, but if you may have additional information to provide and need more time, I can let them know. Just keep me posted.

Findings from the Glyphosate Interim Decision:

- Fish
    - The Agency did not identify potential risks of concern for fish, aquatic invertebrates, or aquatic-phase amphibians. (page 12)
    - However, the ID added an additional statement under "directions for use" for aquatic use labels to require to instruct users to apply glyphosate in strips to help avoid oxygen depletion when emerged weed infestations cover the total surface area of an impounded water body. (Table 4, page 19)
- Mammals
    - The Agency identified potential ecological risk to mammals and birds, but these risks are expected to be limited to the application area or areas near the application area. (page 15)
    - The potential ecological risk to mammals is highlighted in "Appendix A: Summary of Required Actions for Glyphosate", stating that the source of exposure is due to residues on food items (via deposition or spray drift). This dietary route of exposure is categorized as acute and chronic, where the potential risk of concern is growth and reproduction. (page 22)
    - The EPA is mitigating these potential risks by requiring enforceable spray drift management language on the glyphosate pesticide labels, noting that risks are likely limited to the field and areas near the application field. The required label language is described in "Appendix B: Required Labeling Changes for Glyphosate Products" starting on page 23.

Thank you for all of your help!
-Rachel

Rachel Ricciardi
Environmental Protection Specialist
U.S. Environmental Protection Agency | Office of Chemical Safety and Pollution Prevention
Office of Program Support | Mission Support Division | Intergovernmental and Community Relations Branch
202-566-1233

From: Peterson, Steven R. <peterson.stevenr@epa.gov>
Sent: Tuesday, November 2, 2021 4:06 PM
To: Cyran, Carissa <Cyran.Carissa@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>; Page, Jordan <Page.Jordan@epa.gov>; Ricciardi, Rachel <Ricciardi.Rachel@epa.gov>; Hospital, Jocelyn <Hospital.Jocelyn@epa.gov>; Perron, Monique <Perron.Monique@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: FOR PRD INPUT: Response to EPA R1 Tribal inquiry re: glyphosate; DDL: COB Wednesday

Hi Carissa,

I started looking into this inquiry and I think we might need a bit more time to come up with a strategy for our response – I am looping in HED to see if they have any input they would like to add. Under normal circumstances, I would think a more generic response would be sufficient. Carissa, do you know if the draft letter on behalf of EPA R1 Acting Regional Administrator was sent to Chief Peter Paul ? If it has been sent, then I think we will need to provide a more in-depth response. The letter states that OPP will consider "your questions on how the Agency evaluates impacts in forestry settings, including ecological effects and risks to human health from eating animals, including game animals, that may have fed on treated plants."

Although there are no dietary risks of concern from glyphosate use, we only establish tolerances for foods marketed in the U.S. I'll wait to see if others have more to chime in as we move forward. Thanks,

Steven R. Peterson (he/him)
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From: Cyran, Carissa <Cyran.Carissa@epa.gov>
Sent: Monday, November 1, 2021 3:20 PM
To: Peterson, Steven R. <peterson.stevenr@epa.gov>; Page, Jordan <Page.Jordan@epa.gov>
Cc: Friedman, Dana <Friedman.Dana@epa.gov>
Subject: FOR PRD INPUT: Response to EPA R1 Tribal inquiry re: glyphosate; DDL: COB Wednesday

Hello and happy manic Monday,

ICRB received a tribal inquiry from EPA Region 1 from regarding glyphosate and animals ingesting the pesticide. Specific concern -

"is EPA doing anything in regard to Roundup? It is applied to managed forests and affects fish, moose, and deer. What are they doing to animals? Hardwoods are some of what animals eat. How does it really affect our ecology. Deer ingest this."

Does PRD have any language to address the concern? If so, can you please send it by COB Wednesday? Let me know if additional time is needed.

As an FYI, I've copied our standard glyphosate response below.

With regards to glyphosate, in January 2020, after receiving and considering public comments on the glyphosate proposed interim decision, EPA released the ID for registration review. As part of this action, EPA continues to find that there are no risks of concern to human health when glyphosate is used in accordance with current product labels. EPA also found that glyphosate is not likely to be a human carcinogen. EPA is requiring management measures to help farmers target pesticide sprays to intended pests, protect pollinators, and reduce the problem of weeds becoming resistant to glyphosate. More information regarding glyphosate is available on EPA's website (https://www.epa.gov/ingredients-used-pesticide-products/glyphosate).

In November 2020, EPA released the draft biological evaluation (BE) for glyphosate for a public comment period, which closed March 12, 2021 (https://www.epa.gov/pesticides/epa-releases-draft-biological-evaluation-glyphosate). BEs are the beginning of EPA's Endangered Species Act consultation review process for pesticides where the agency determines whether the pesticide "may affect" one or more individuals of a listed species and their designated critical habitats. The Fish and Wildlife Service and the National Marine Fisheries Service use the information in EPA's final BE to develop their biological opinion to determine if the pesticide jeopardizes the continued existence of the species and whether or not there is adverse modification to its critical habitat.

Additionally, on May 18, 2021, EPA filed a motion for partial voluntary remand of the glyphosate ID, seeking to reconsider those portions of the ID that do not relate to the Agency's conclusions on human health risks or the usage and benefits of glyphosate.

Many thanks,

Carissa

Carissa Cyran

Communications Branch
Office of Chemical Safety and Pollution Prevention
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(202) 566 -1353

(Pronouns: she/her/hers)

From: Ricciardi, Rachel <Ricciardi.Rachel@epa.gov>
Sent: Monday, November 1, 2021 10:16 AM
To: Lara, Rhina <Lara.Rhina@epa.gov>
Subject: FW: Response to Chief Peter Paul of Micmac Nation (EPA Region 1)

Good morning Rhina,

ICRB received an inquiry from EPA Region 1 about glyphosate, as they received a question from a tribal member specifically asking the questions below. Does the Comms team have a desk statement or any up-to-date language that can be used for glyphosate inquiries?

> "is EPA doing anything in regard to Roundup? It is applied to managed forests and affects fish, moose, and deer. What are they doing to animals? Hardwoods are some of what animals eat. How does it really affect our ecology. Deer ingest this."

I can also pull information from the glyphosate ID and risk assessment to specifically answer the tribal member's concerns about fish, moose, and deer and our risk assessment process, but I thought I'd check in with you first to stay consistent in our overall messaging.

Thank you for your help!
-Rachel

Rachel Ricciardi
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Office of Program Support | Mission Support Division | Intergovernmental and Community Relations Branch
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From: Carr, Stephanie
Sent: Friday, October 29, 2021 9:35 AM
To: Picone, Kaitlin <Picone.Kaitlin@epa.gov>
Subject: Response to Chief Peter Paul of Micmac Nation

Hi Kaitlin –

I hope all is well with you! I am reaching out because Region 1's leadership participated in the recent Tribal Leaders Summit where we received comments from Micmac Chief Peter Paul. Chief Peter Paul's comments included "is EPA doing anything in regard to Roundup? It is applied to managed forests and affects fish, moose, and deer. What are they doing to animals? Hardwoods are some of what animals eat. How does it really affect our ecology. Deer ingest this." He specifically mentioned the Maine governor's veto of a bill regarding glyphosate.

We are drafting a response to go from our Acting Regional Administrator to the Chief letting him know we appreciated hearing his comments and will follow-up with more information. However, we did not want to get out in front of OPP by communicating specifics about the registration, risks, etc. Would you be able to point me to someone in the Registration Division who could coordinate a follow-up response from OPP to the chief addressing his concerns regarding risks (we are inferring too that by mention of deer he may have concerns about human health risks from consuming deer). It would also be helpful if the letter could summarize or point to EPA's current policy communications on the use of glyphosate and give a status and summary of the registration review.

Thank you very much in advance for your help, Stephanie

Stephanie Carr
RCRA Waste Management, Underground Storage Tanks and Pesticides Programs Section
EPA Region 1
Phone: 617-918-1363