

Message

From: James V. Aidala [jaidala@lawbc.com]
Sent: 7/24/2017 10:16:27 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: Trail of 15 Year "Goal" for Registration Review

When briefed, ask about "the living RED" – it was what RED's were called in earlier times since the assessment is always on-going, subject to change from more and new data, or discoveries of new issues or other things.

That is partly why a RED, or now "registration review," was not a final agency action – it did not "do" anything until applied to what the agency said should be on an end-use product label which can capture the formulation specific characteristics as applied to the use situation allowed on the label. Hence, literally counting the end uses which were approved in concert to what the RED/registration review said (ok for granular uses, not for liquid formulations, ok if used only twice a year at or less than 5. Pounds/acre and with a ten-foot buffer and so on).

Sorry to be so nerdy but the distinctions have been how the program has responded to the question of progress, and how to measure it, over the years.

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Monday, July 24, 2017 6:00 PM
To: James V. Aidala
Subject: RE: Trail of 15 Year "Goal" for Registration Review

Ha! Yes, the definition is indeed a question I have – what does done look like??

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273
M: Ex. 6 Personal Privacy (PP)
beck.nancy@epa.gov

From: James V. Aidala [mailto:jaidala@lawbc.com]
Sent: Monday, July 24, 2017 5:58 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: RE: Trail of 15 Year "Goal" for Registration Review

Goat may be a better term than goal, but yes.

At the same time, since exactly what "registration review" means (not trying to do the "...definition of is, is"), it is not clear how one might define completing the review or "missing the deadline."

In years past the when the progress of the program has been criticized about x of 600 active ingredient cases have been reviewed, the agency has been able to say it has prioritized the top uses that represent the bulk of the usage by acreage (e.g. the top 25 pesticides alone probably represent a sizable fraction of all acre-treatments).

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Monday, July 24, 2017 5:28 PM
To: James V. Aidala
Cc: Susan Kirsch
Subject: RE: Trail of 15 Year "Goal" for Registration Review

So basically it was originally intended to be a goat in the FQPA in 1996, but in 2007 it was amended as part of PRIA 2 reauthorization.

Thank you for clarifying,
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273
M: Ex. 6 Personal Privacy (PP)
beck.nancy@epa.gov

From: James V. Aidala [<mailto:jaidala@lawbc.com>]
Sent: Monday, July 24, 2017 4:35 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: James V. Aidala <jaidala@lawbc.com>; Susan Kirsch <skirsch@lawbc.com>
Subject: Trail of 15 Year "Goal" for Registration Review

Nancy

As I mentioned, this is a quick review by Susan Kirsch of B&C looking at PRIA vs. FQPA original language that I mentioned in my other email.

Happy to discuss anytime.

Jim