

Message

From: Cassie Shirk -GOV- [cassie.shirk@maryland.gov]
Sent: 7/17/2017 6:39:20 PM
To: Keigwin, Richard [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=151baabb6a2246a3a312f12a706c0a05-Richard P Keigwin Jr]
CC: Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, El]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: Re: Pesticides on tobacco

Rick:

This is very helpful.

Thank you so much! I really appreciate the quick turnaround time.



Cassie Shirk
Policy Advisor

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100 State Circle
Annapolis, MD 21401

Ex. 6

cassie.shirk@maryland.gov

On Mon, Jul 17, 2017 at 2:14 PM, Keigwin, Richard <Keigwin.Richard@epa.gov> wrote:
Cassie--

Thanks for your note. Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), it is a violation of federal law to use a pesticide inconsistent with its label. In lay terms, this means that a product can only be used on the sites listed on the label and only when applied according to the specific label directions on that label. So, in general, if a registered product is not on the list we provided earlier, it cannot be applied to tobacco.

A few caveats:

--Registrations change regularly, either because registrants seek changes to their registrations or because, as part of our reevaluation process, additional label changes are necessary.

--States have the authority under certain circumstances to add uses to labels, using the FIFRA 24(c) process. The Maryland Department of Agriculture would have this information.

--Similarly, if an emergency situation exists, a state can seek permission from EPA to use an unregistered pesticide for a certain use. Again, the Maryland Department of Agriculture would have information on what emergency exemptions (section 18's) have been sought for the use of pesticide products on tobacco.

--Rick

Rick Keigwin
Acting Director, Office of Pesticide Programs

U.S. Environmental Protection Agency
Sent from my iPhone

On Jul 17, 2017, at 1:36 PM, Cassie Shirk -GOV- <cassie.shirk@maryland.gov> wrote:

Good afternoon, Tate:

I was wondering if the EPA has a list of pesticides that are prohibited for use on tobacco crops? I know you sent me the federally-registered product that can be used on tobacco at some stage in its production, but was wondering if there is a list of prohibited pesticides. Or would any pesticide not on the list you sent me be prohibited?

Please let me know.

Thanks,

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On Wed, Jul 5, 2017 at 12:32 PM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:
Team effort!

On Jul 5, 2017, at 12:31 PM, Cassie Shirk -GOV- <cassie.shirk@maryland.gov> wrote:

Thank you so much for getting me this information on Friday. I really appreciate it.

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On Fri, Jun 30, 2017 at 2:23 PM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:

Cassie-

Thanks to Rick, the attached file lists every federally-registered product that can be used on tobacco at some stage in its production, including those uses where tobacco might be treated post-harvest while it is in storage.

Please note that this list should not be used as a substitute for a pesticide user to consult the label for specific directions on how to use the product. Not all of these products will necessarily be available for use in the State of Maryland. EPA does not maintain information regarding which products are registered in which states. The state lead agency for pesticide regulation would be the best source for that information.

Hope this helps.

Tate

Elizabeth Tate Bennett

Senior Deputy Associate Administrator

Congressional and Intergovernmental Affairs

Office of the Administrator

U.S. Environmental Protection Agency