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**From:** Daguillard, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BBE9682B940C4F2C90732E4D37355DD4-DAGUILLARD,]  
**Sent:** 4/30/2018 6:33:07 PM  
**To:** Dave Rattigan [Ex. 6]  
**CC:** Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]  
**Subject:** RE: Subject: Re: Tree Care Industry Association

Good afternoon Dave,

On background, please:

**Question 1:** Basically, I've been told that the EPA approval process for organic products is time consuming. I assume that the approval process is thorough anyway, but wonder whether it's a longer process for organic products, and if so why?

**Response 1:** The National Organic Program is under the jurisdiction of the U.S. Department of Agriculture's. USDA determines what pesticides can be used in organic production. If USDA determines that a pesticide can be used in organic production, the pesticide manufacturer can ask EPA to amend its registration to include the USDA organic logo on their pesticide product.

EPA evaluates the safety of pesticides. The registration timelines for biopesticides are generally faster than those for conventional pesticides.

**Question 2:** Also, is it correct that EPA approval is only needed for pesticides and biopesticides, and not for plant growth products?

**Response 2:** No. Under the Federal Insecticide, Fungicide, and Rodenticide Act, plant [growth] regulators are pesticides and are, therefore, required to be registered by EPA.

**Question 3:** From an EPA standpoint, is there a preference for organic products?

**Response 3:** EPA does not recommend any particular product. Pesticide products that are registered by EPA have been evaluated for safety used in accordance with the label.

Cheers, R.

Robert Daguillard  
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[Ex. 6]

**From:** Dave Rattigan [Ex. 6]  
**Sent:** Monday, April 23, 2018 11:19 AM  
**To:** Daguillard, Robert <Daguillard.Robert@epa.gov>  
**Subject:** Re: Subject: Re: Tree Care Industry Association

Hi Robert,

For now, that's what I need. I know there's material on your site as well.

My plan is to finish and file this week, for publication in the next monthly issue.

-Dave

-----Original Message-----

From: Daguillard, Robert <Daguillard.Robert@epa.gov>

To: rattigand <[REDACTED]> Ex. 6

Sent: Mon, Apr 23, 2018 11:00 am

Subject: Subject: Re: Tree Care Industry Association

Good morning Dave,

My colleague Cara Finn forwarded me your inquiry. EPA's pesticides program will take a look. Meantime, do you have any additional questions for us? Also, when are you planning to publish your story?

Happy to discuss. Thanks in advance, R.

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From: Dave <[REDACTED]> Ex. 6

Sent: Monday, April 23, 2018 9:02 AM

To: Anderson, Marcia <Anderson.Marcia@epa.gov>

Subject: Re: Tree Care Industry Association

Hi Marcia,

Thanks so much. Basically, I've been told that the EPA approval process for organic products is time consuming. I assume that the approval process is thorough anyway, but wonder whether it's a longer process for organic products, and if so why?

Also, is it correct that EPA approval is only needed for pesticides and biopesticides, and not for plant growth products?

From an EPA standpoint, is there a preference for organic products?

Thanks.

Dave Rattigan

[REDACTED] Ex. 6

Sent from my iPhone

On Apr 23, 2018, at 8:24 AM, Anderson, Marcia <Anderson.Marcia@epa.gov> wrote:

Hi Dave,

We cannot help you with state policies, as states have primacy in determining their regulations that go beyond the federal regulations. Those you must go to the individual states.

For guidance on the EPA approval process – send your questions. I can gladly forward them to someone who can answer.

Marcia

**From:** Dave Rattigan Ex. 6  
**Sent:** Friday, April 20, 2018 3:10 PM  
**To:** Anderson, Marcia <[Anderson.Marcia@epa.gov](mailto:Anderson.Marcia@epa.gov)>  
**Subject:** Tree Care Industry Association

Hi Marcia,

My boss, Don Staruk, said you might be a great source for a story I'm writing on the EPA (and state DEP) approval process, specifically for organic products. Could be set up a time to speak about it this week?

Any time Monday morning is great for me, or Tuesday morning until 11/afternoon after 3.

Sincerely,

-Dave Rattigan  
TCIA Magazine

**Ex. 6**