

Message

From: Scott Herndon [sherndon@americansugarbeet.org]
Sent: 5/11/2017 11:12:37 AM
To: Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, E]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Palich, Christian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=330ad62e158d43af93fcbbece930d21a-Palich, Chr]; Cassie Bladow [Cassie.Bladow@beetsugar.org]; Graham, Amy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26722dfde5b34925b0ad9a8dd4aff308-Graham, Amy]
Subject: Re: Section 18

I was planning on attending as well.

My cell is Ex. 6

Thank you all so much for helping us sort through this!

Scott

Sent from my iPhone

On May 10, 2017, at 10:20 PM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:

Scott- Christian and Amy will be at the hearing tomorrow with Rick. Were you planning to be there?

On May 10, 2017, at 10:05 PM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:

This is bizarre. On our call when we discussed reaching out to Stabenow, Rick clearly stated that he would state that believed his staff spoke prematurely and that they were looking at all the options.

Rick seems like such a straight shooter this just isn't adding up. Are we sure that Rick was the only one that spoke w Stabenows office and there wasn't some other call with his staffer?

I can check w Sven as he would have been on the call.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273

Ex. 6
Beck.Nancy@epa.gov

On May 10, 2017, at 9:27 PM, Palich, Christian <palich.christian@epa.gov> wrote:

I sat in on that call for a minute but was pulled away to another meeting, ill follow up with career staff in the morning to see a status.

I'll defer to Nancy on how to handle this more technical response.

Thanks so much for the heads up Scott.

Christian R. Palich
Deputy Associate Administrator
Congressional & Intergovernmental Relations
202.306.4656

Sent from my iPhone

On May 10, 2017, at 9:15 PM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:

Thank you for the heads up. Looping in Nancy as it relates to the imminent hearing tomorrow. We probably need to give some messaging instructions on this so he doesn't tie our hands "on the record." Thoughts?

On May 10, 2017, at 9:10 PM, Scott Herndon <sherndon@americansugarbeet.org> wrote:

Tate,

I wanted to give you a heads up that Senator Stabenow's Ag. Committee staff spoke with EPA career staff this afternoon. The EPA staff don't believe that they have any room on this issue and still believe there is a data gap. From what Stabenow's staff relayed to me, EPA staff characterized the Section 18 component as relatively straightforward under FIFRA but the Food Drug and Cosmetic Act (FDCA) requirements for residues and granting tolerances are very strict. Under Section 18, the cost benefit analysis can weigh the economic harm, etc. I asked them to triple check with EPA that they were looking at the data SipCam submitted on Friday and they said they would (attached).

Also, they may bring this up at the Senate Agriculture hearing tomorrow with the Director of Pesticide Programs. We did not ask them to do this but I also don't think that I can ask them not to do it. I just wanted to give you a heads up so you all wouldn't be caught off guard. Hearing info here: <https://www.agriculture.senate.gov/hearings/pesticide-registration-under-the-federal-insecticide-fungicide-and-rodenticide-act-providing-stakeholders->

with-certainty-through-the-pesticide-
registration-improvement-act

Thanks again!

Scott

Scott Herndon
*Director of Biotechnology and
Regulatory Affairs*
American Sugarbeet Growers
Association
202-595-0786

From: Cassie Bladow
[mailto:Cassie.Bladow@beetsugar.org]
Sent: Tuesday, May 09, 2017 4:43 PM
To: Bennett, Tate
<Bennett.Tate@epa.gov>; Scott
Herndon
<sherndon@americansugarbeet.org>
Subject: RE: Section 18

Thank you, Tate! Really appreciate your help!

From: Bennett, Tate
[mailto:Bennett.Tate@epa.gov]
Sent: Tuesday, May 9, 2017 4:37 PM
To: Scott Herndon
<sherndon@americansugarbeet.org>
Cc: Cassie Bladow
<Cassie.Bladow@beetsugar.org>
Subject: RE: Section 18

FYI we are on it.

Interesting. I'm not confident her management is aware of these conversations. Will find out.

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSP
P: 202-564-1273

Ex. 6

Beck.Nancy@epa.gov

From: Scott Herndon
[mailto:sherndon@americansugarbeet.org]

Sent: Tuesday, May 9, 2017 4:09 PM
To: Bennett, Tate
<Bennett.Tate@epa.gov>
Cc: Cassie Bladow
<Cassie.Bladow@beetsugar.org>
Subject: RE: Section 18

Tate,

I've looped Cassie back in and wanted to give you both an update. Dr. Mohamed Khan with NDSU had a conversation with Andrea Conrath at EPA (her contact information is below) this morning about the new data that was supplied by SipCam. Dr. Khan prepared the Section 18 applications that were requested by the ND and MN Departments of Agriculture. He also prepared the application that we expect the Michigan Department of Agriculture to file soon.

In his email to me he stated "I spoke to Andrea today at EPA. Unfortunately, she does not believe the new tolerance data submitted will help. Seems they are looking for some data for some other studies." I have been unable to determine what additional data they need and have asked Dr. Khan if that was relayed to him but have not yet heard back.

<image001.jpg>

Thanks!

Scott Herndon
Director of Biotechnology and
Regulatory Affairs
American Sugarbeet Growers
Association
1155 15th Street NW #1100
Washington, DC 20005
202-595-0786

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

From: Scott Herndon
Sent: Monday, May 8, 2017 5:43 PM
To: 'Bennett, Tate'

<Bennett.Tate@epa.gov>

Subject: RE: Section 18

SipCam has state registrations for Cercos (brand name) in Michigan, North Dakota, Minnesota.

North Dakota expires in 12/31/2017

Michigan expires in 6/30/2017

Minnesota expires 12/31/2017

SipCam will renew all of them

Scott Herndon
Director of Biotechnology and
Regulatory Affairs American Sugarbeet
Growers Association
1155 15th Street NW #1100
Washington, DC 20005
202-595-0786

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

From: Bennett, Tate
[mailto:Bennett.Tate@epa.gov]
Sent: Monday, May 8, 2017 5:33 PM
To: Scott Herndon
<sherndon@americansugarbeet.org>
Subject: Re: Section 18

Do these states currently have permits?
What is the exact date of expiration?

> On May 8, 2017, at 5:20 PM, Scott
Herndon
<sherndon@americansugarbeet.org>
wrote:
>
> Tate,
>
> Apologies for the delay! I am now
back at my computer and have put
together a short backgrounder as well
as relevant industry contacts.
>
> I have also attached the
correspondence from EPA to the ND
and MN Departments of Agriculture
asking them to withdraw their request.
>
> In addition, I have attached a cover
letter that SipCam submitted to EPA on
Friday, May 5th with additional data.

>
> Thanks so much for your help and
> please don't hesitate to email or call if
> you have any questions.
>
> Have a great evening!
>
> Scott
>
> Scott Herndon
> Director of Biotechnology and
> Regulatory Affairs American Sugarbeet
> Growers Association
> 1155 15th Street NW #1100
> Washington, DC 20005
> 202-595-0786

Ex. 6

>
> -----Original Message-----
> From: Bennett, Tate
> [mailto:Bennett.Tate@epa.gov]
> Sent: Monday, May 8, 2017 3:34 PM
> To: Scott Herndon
> <sherndon@americansugarbeet.org>
> Cc: Cassie Bladow
> <Cassie.Bladow@beetsugar.org>
> Subject: Re: Section 18
>
> Thanks!
>
>> On May 8, 2017, at 3:32 PM, Scott
>> Herndon
>> <sherndon@americansugarbeet.org>
>> wrote:
>>
>> Tate,
>>
>> I have all of the information in my
>> office but am on the Hill right now. I'll
>> send everything to you this evening.
>>
>> Thanks so much!
>>
>> Scott
>>
>> Sent from my iPhone
>>
>>> On May 8, 2017, at 3:13 PM,
>>> Bennett, Tate <Bennett.Tate@epa.gov>
>>> wrote:
>>>
>>> Hey Scott- do you have any
>>> summaries/background papers?

>>>

>>>> On May 8, 2017, at 2:47 PM,

Cassie Bladow

<Cassie.Bladow@beetsugar.org> wrote:

>>>>

>>>> Tate,

>>>>

>>>> Thank you for taking the time to chat this morning. As we discussed, I am looping Scott Herndon who works for the American Sugarbeet Growers Association into the conversation since he has done a lot of work on this issue and will be able to provide you with background and answer any questions you have.

>>>>

>>>> We really appreciate your guidance helping us move this along, especially given our tight timeline.

>>>>

>>>> Thanks again!

>>>> Cassie

>>>>

> <Section 18 for Chlorothalonil

Contacts.docx> <Chlorothalonil

> Background.docx>

> <2017-05-05 Chlorothalonil Tech-

Echo 500 Sugarbeet Tol Pet-Label

> Amend-C....pdf> <EPA email to ND

and MN Departments of

> Agriculture.docx>

<2017-05-05 Chlorothalonil Tech-

Echo 500 Sugarbeet Tol Pet-Label

Amend-C....pdf>