

Message

From: Pat Quinn [pquinn@theaccordgroup.com]
Sent: 11/28/2017 2:58:30 PM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
Subject: RE: RERESPONSE REQUESTED-- Briefing on Proposal to Exempt from Tolerance FDA Approved Food Additives (Flavorings) for Use as Fragrance Ingredients in Food Contact Antimicrobials

Just worked things out with Kaitlin. We are good to go on 12/14 at 9:30. Sorry about the confusion. She is terrific .

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Tuesday, November 28, 2017 9:40 AM
To: Pat Quinn <pquinn@theaccordgroup.com>
Subject: Fwd: RERESPONSE REQUESTED-- Briefing on Proposal to Exempt from Tolerance FDA Approved Food Additives (Flavorings) for Use as Fragrance Ingredients in Food Contact Antimicrobials

FYI. Is your number correct?

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

Begin forwarded message:

From: "Keller, Kaitlin" <keller.kaitlin@epa.gov>
Date: November 28, 2017 at 9:38:21 AM EST
To: "Beck, Nancy" <Beck.Nancy@epa.gov>, "Bolen, Derrick" <bolen.derrick@epa.gov>
Subject: RE: RERESPONSE REQUESTED-- Briefing on Proposal to Exempt from Tolerance FDA Approved Food Additives (Flavorings) for Use as Fragrance Ingredients in Food Contact Antimicrobials

He must be out of the office, I've called him twice on this.

From: Beck, Nancy
Sent: Tuesday, November 28, 2017 9:19 AM
To: Bolen, Derrick <bolen.derrick@epa.gov>
Cc: Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: Re: RERESPONSE REQUESTED-- Briefing on Proposal to Exempt from Tolerance FDA Approved Food Additives (Flavorings) for Use as Fragrance Ingredients in Food Contact Antimicrobials

Ok. Well lets make sure Mr Quinn is aware and lets work with him on a new date.
Thanks!

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

On Nov 28, 2017, at 9:16 AM, Bolen, Derrick <bolen.derrick@epa.gov> wrote:

That is correct.

Thank you,
Derrick Bolen

On Nov 28, 2017, at 9:16 AM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:

Can you guys handle today? My recollection was the windows didn't work for Rick.

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

Begin forwarded message:

From: Pat Quinn <pquinn@theaccordgroup.com>
Date: November 28, 2017 at 9:06:11 AM EST
To: "Beck, Nancy" <Beck.Nancy@epa.gov>, "Keigwin, Richard" <Keigwin.Richard@epa.gov>
Cc: "Goodis, Michael" <Goodis.Michael@epa.gov>, "Weiss, Steven" <Weiss.Steven@epa.gov>, Bill McCormick <william.mccormick@clorox.com>, "Diane Boesenberg" <diane.boesenberg@rb.com>, Hal Ambuter <hal.ambuter@reckittbenckiser.com>, Jan Dhonau <dhonau.jl@pg.com>, "Julie Timberman" <julie.timberman@clorox.com>, Mary Joy Stuart <stuart.m@pg.com>, Peggy Hartness <peggyh@theaccordgroup.com>, Sean Broderick <broderick.sp@pg.com>, Teresa Moore <moore.tc@pg.com>, "Bolen, Derrick" <bolen.derrick@epa.gov>, "Keller, Kaitlin" <keller.kaitlin@epa.gov>, "Bertrand, Charlotte" <Bertrand.Charlotte@epa.gov>
Subject: RE: RERESPONSE REQUESTED-- Briefing on Proposal to Exempt from Tolerance FDA Approved Food Additives (Flavorings) for Use as Fragrance Ingredients in Food Contact Antimicrobials

Derrick/Kaitlyn, I have one client traveling from San Francisco for this meeting and he needs to make plans. Also, given the subject matter and travel commitment, I would prefer to have 60 minutes, but I also how jammed Nancy's schedule has become so I understand the constraints.

Could we possibly try to nail something down today ? Thanks, Pat

From: Beck, Nancy [mailto:Beck.Nancy@epa.gov]
Sent: Monday, November 20, 2017 2:59 PM
To: Pat Quinn <pquinn@theaccordgroup.com>;
Keigwin, Richard <Keigwin.Richard@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Weiss,
Steven <Weiss.Steven@epa.gov>; Bill McCormick
<william.mccormick@clorox.com>; Diane Boesenberg
<diane.boesenberg@rb.com>; Hal Ambuter
<hal.ambuter@reckittbenckiser.com>; Jan Dhonau
<dhonau.jl@pg.com>; Julie Timberman
<julie.timberman@clorox.com>; Mary Joy Stuart
<stuart.m@pg.com>; Peggy Hartness
<peggyh@theaccordgroup.com>; Sean Broderick
<broderick.sp@pg.com>; Teresa Moore
<moore.tc@pg.com>; Bolen, Derrick
<bolen.derrick@epa.gov>; Keller, Kaitlin
<keller.kaitlin@epa.gov>; Bertrand, Charlotte
<Bertrand.Charlotte@epa.gov>
Subject: RE: RERESPONSE REQUESTED-- Briefing on
Proposal to Exempt from Tolerance FDA Approved Food
Additives (Flavorings) for Use as Fragrance Ingredients
in Food Contact Antimicrobials

Pat,
I'm looping in our special assistants Derrick and Kaitlyn
to see if they can find a 30 minute window for us.
I know Dec 11 will not work (all day TSCA meeting) but
we can see if the other windows are options.

Regards,
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: Pat Quinn [mailto:pquinn@theaccordgroup.com]
Sent: Monday, November 20, 2017 1:54 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Keigwin,
Richard <Keigwin.Richard@epa.gov>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Weiss,
Steven <Weiss.Steven@epa.gov>; Bill McCormick
<william.mccormick@clorox.com>; Diane Boesenberg
<diane.boesenberg@rb.com>; Hal Ambuter
<hal.ambuter@reckittbenckiser.com>; Jan Dhonau
<dhonau.jl@pg.com>; Julie Timberman
<julie.timberman@clorox.com>; Mary Joy Stuart
<stuart.m@pg.com>; Pat Quinn
<pquinn@theaccordgroup.com>; Peggy Hartness

<peggyh@theaccordgroup.com>; Sean Broderick

<broderick.sp@pg.com>; Teresa Moore

<moore.tc@pg.com>

Subject: RERESPONSE REQUESTED-- Briefing on
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Additives (Flavorings) for Use as Fragrance Ingredients
in Food Contact Antimicrobials

Importance: High

Nancy/ Rick, I hope you are both well and
preparing for Turkey Day !...and a well -deserved
break....

My Innovation Reform Group (Clorox, P&G, Reckitt
Benckiser) has worked collaboratively with OPP for
the last 18 years on policy and process reforms that
have yielded benefits to EPA and the regulated
community. One area of concentration has been
fragrances and how best to provide EPA with data
on fragrance ingredient safety in order that
registrants making sanitizers and disinfectants
might make changes efficiently and quickly without
any compromise to public health protection. The
work of the IRG companies along with the
fragrance industry resulted in the EPA Fragrance
Ingredient List (FIL) containing about 1500
approved fragrance ingredients and maintained by
IIAB in RD and the EPA Fragrance Notification
Program , which has worked flawlessly for nearly a
decade saving registrants and OPP precious
resources.

The IRG submitted a proposal (attached) under
E.O. 13777 suggesting that EPA use existing
authority to exempt from tolerance requirements
about 1100 FDA approved direct and indirect food
additives. These are naturally derived flavoring
ingredients reviewed and approved by independent
expert panels (JECFA, FEMA); these are
commonly consumed by all of us in our daily diet.
The 1100 represent a substantial portion of the
EPA FIL and would allow registrants making food
contact sanitizers/disinfectants to continue to sell
fragranced products demanded by their customers
for use in the kitchen.

Why is this necessary ? Simply put, OPP's view of
residues left from food contact disinfectants has
changed. Previously, it was assumed that –if a
potable water rinse was required—no residues of
concern would remain. That is no longer the case;
the effect of a water rinse has been diminished and
worst case residues are assumed. In addition ,
OPP's definition of a “ food contact surface” has
been substantially expanded. Virtually no fragrance
ingredients currently have EPA tolerances or

tolerance exemptions. The process of obtaining them for 1500 ingredients is daunting, lengthy, expensive and would result in no risk reduction or public health benefit. If IIAB completed one tolerance review/ week, the process could take 22 years and cost tens of millions of dollars. FDA has reviewed the safety of these food additives; they are commonly consumed; accepting FDA's science instead of conducting a duplicative review just makes good sense.

The IRG briefed RD (Mike) and AD (Steve) on 11/2 on the proposal (see attached PP slides). We would now propose to brief the two of you with RD, AD and perhaps OGC present. The following dates are suggested :

Monday 12/11

Tuesday 12/12

Wednesday 12/13

This is a science based initiative that will reduce burdens on EPA and the private sector; avoid duplicative reviews by sister Agencies; allow limited OPP resources to be more effectively directed while protecting public health. We won't waste your time !

Happy Thanksgiving and I look forward to hearing what might work for you on those dates.

Pat