

Message

From: Steven D. Bennett [sbennett@thehcpa.org]
Sent: 6/15/2018 12:00:34 AM
To: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]
CC: Keller, Kaitlin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d7a6b15adfd745c6ada1c121dec27ac4-Keller, Kai]; Bolen, Derrick [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1ffc58b0468c4deca51a8bad735b7d95-Bolen, Derr]
Subject: Re: Request a Meeting on FIFRA 25(b) Minimum Risk Pesticides
Attachments: ATT00001.txt

Nancy,

Hopefully the 11th works. One of members met with Rick K. last week (RB) and he recommended that we meet with you. In addition, having a level playing field on 25(b) products is a long-standing issue with our members (we filed a petition in 2006 that was only partially resolved) and increasingly, the states. In the intervening years, 25(b) products have taken off which is compounded the problem.

I forgot to note before the attendees would likely be myself, 3 member companies and Erica M. & Sara C. from the AAPCO 25(b) Work Group for 30 minutes

Additional details below

thanks

A little background on the 25(b) issue

- CSPA Petition (2006) - <https://www.regulations.gov/contentStreamer?documentId=EPA-HQ-OPP-2010-0227-0015&contentType=pdf>
- CSPA Follow-up letter (2007) - https://www.epa.gov/sites/production/files/2014-10/documents/cspa_petition.pdf
- EPA Response and Follow-up (2007) - https://www.epa.gov/sites/production/files/2014-10/documents/epa_response.pdf

AAPCO 25(b) Work Group webpage - <https://aapco.org/2015/07/02/fifra-25b-workgroup/>

- *The workgroup's mission is to facilitate the collaboration of states and industry in order to share information, provide guidance, foster label consistency, and reduce the duplication of efforts in the review and registration of Minimum Risk Pesticide products.*
- The materials below have been developed by the workgroup, Chaired by Erica Millette, NM with Sarah Caffery, IN joining in March 2018 as Co-Chair.

Steven Bennett, Ph.D.

Vice President of Scientific Affairs
Floor Care Division Staff Executive
Pest Management Division Staff Co-Executive

Household and Commercial Products Association

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From: Nancy Beck <Beck.Nancy@epa.gov>
Date: Thursday, June 14, 2018 at 1:00 PM
To: "Steven D. Bennett" <sbennett@thehcpa.org>
Cc: "Keller, Kaitlin" <keller.kaitlin@epa.gov>, "Bolen, Derrick" <bolen.derrick@epa.gov>
Subject: RE: Request a Meeting on FIFRA 25(b) Minimum Risk Pesticides

Steve,

I will work with the team and schedulers to see what is workable. I know for certain I will be unavailable on the 10th- so that's out for sure.

Has your group already met with Rick and his team on this topic?

Thanks,
Nancy

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

Ex. 6
beck.nancy@epa.gov

From: Steven D. Bennett [mailto:sbennett@thehcpa.org]
Sent: Thursday, June 14, 2018 12:11 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Subject: Request a Meeting on FIFRA 25(b) Minimum Risk Pesticides

Nancy,

On behalf of the HCPA Pest Management Division and the AAPCO 25(b) Work Group, I would like to request a meeting with you to discuss FIFRA 25(b) Minimum Risk Pesticides products. We want to discuss ways to improve federal oversight and enforcement against the products that are making false and misleading claims.

If your schedule permits, we would like to have the meeting **on July 10th or 11th after 5 pm.** (the state pesticide officials are in town during these days for a workshop as well as PRIA stakeholder meeting)

Hopefully one of the dates work and happy to discuss at your convenience. Thanks

Steven Bennett, Ph.D.
Vice President of Scientific Affairs

Floor Care Division Staff Executive
Pest Management Products Division Staff Co-Executive



Register for XPAND2018

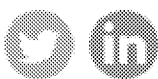
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