

Message

From: Daguillard, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BBE9682B940C4F2C90732E4D37355DD4-DAGUILLARD,]
Sent: 8/10/2017 3:25:20 PM
To: Carey Gillam [Ex. 6]
CC: Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]
Subject: RE: RE: Subject: question on formulated product testing

Carey, for attribution to "an EPA spokesperson," please:

EPA did have all the information needed about glyphosate formulas in the United States. What we didn't have was the composition of formula information for foreign products (which are not used in the United States), which we were able to get from the registrant. EPA needed it because part of the upcoming SAP evaluation was a consideration of numerous epidemiology studies from the United States and Europe.

NTP's work investigating the role of glyphosate in product formulations and the differences in formulation toxicity is still progressing. To clarify, NTP initiated this work and EPA's role in this project is advisory in nature. EPA has provided technical guidance in the past and will continue to do so, if needed.

Thanks, R.

Robert Daguillard
Office of Media Relations
U.S. Environmental Protection Agency
Washington, DC
+1 (202) 564-6618 (O)

Ex. 6

From: Carey Gillam [Ex. 6]
Sent: Tuesday, August 08, 2017 3:06 PM
To: Daguillard, Robert <Daguillard.Robert@epa.gov>
Cc: Press <Press@epa.gov>
Subject: Re: RE: RE: Subject: question on formulated product testing

Story circulating I see on Yahoo platform. If you do have an update, please send soonish.
Cheers,
Carey

On Friday, August 4, 2017, 11:43:55 AM CDT, Daguillard, Robert <Daguillard.Robert@epa.gov> wrote:

All right. Thanks.

From: Carey Gillam [Ex. 6]
Sent: Friday, August 04, 2017 12:30 PM
To: Daguillard, Robert <Daguillard.Robert@epa.gov>
Cc: Press <Press@epa.gov>
Subject: Re: RE: Subject: question on formulated product testing

So yes this will be in HuffPo, though might go out first in EcoWatch, which is often fed to Yahoo News, and/or Environmental Health News.

I added this question yesterday and hoping you didn't miss it:

* Is the EPA's work with the NTP progressing or not? EPA stated last September that it was working with the National Toxicology Program Division of the National Institute of Environmental Health Sciences to develop a research plan that would evaluate "the role of glyphosate in product formulations and the differences in formulation toxicity."

Is that ongoing or not?

Story will go Monday or Tuesday at latest.

Thanks so much.

Best regards,

Carey Gillam

Ex. 6

On Friday, August 4, 2017, 10:55:17 AM CDT, Daguillard, Robert <Daguillard.Robert@epa.gov> wrote:

Hullo Carey,

We have your questions. Are you looking to write a story for the Huffington Post or another outlet? If so, what's your deadline?

Thanks, R.

From: Carey Gillam **Ex. 6**
Sent: Friday, August 04, 2017 11:45 AM
To: Daguillard, Robert <Daguillard.Robert@epa.gov>
Subject: Re: Subject: question on formulated product testing

Thank you for this. Can you tell me why EPA was asking Monsanto in March and April of last year to tell the agency what it had been using in Roundup for the last 30 years? Documents show that EPA told Monsanto it had a "time sensitive" need for the information, particularly information on the inert ingredients used in popular US and European formulations of glyphosate in the present day and also dating back to the 80s. EPA also asked Monsanto provide information that documents the changes of glyphosate formulations over time and across the globe.

At the same time, EPA was responding to public questions about the safety of formulated products, telling the public that the EPA had all the information about the ingredients in formulated products and that there was no reason for the public to be concerned.

It seems a bit disingenuous to be telling the public the EPA has the information it needs but telling Monsanto it needs to get the information.

Can you reply? Or perhaps put me on the phone with Khue Nguyen ?

Best regards,

Carey Gillam

Ex. 6

Ex. 6

On Friday, August 4, 2017, 9:22:22 AM CDT, Daguillard, Robert <Daguillard.Robert@epa.gov> wrote:

Carey, with apologies for the delay and for attribution to “an EPA spokesperson,” please.

EPA does not routinely require long-term toxicity studies for pesticide product formulations. EPA does, however, require data on acute and long-term toxicity for all registered active ingredients, as mandated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). EPA carefully evaluates the hazard potential for each active ingredient.

For formulated end-use products, EPA requires a battery of acute toxicity studies to support the registration of each product. Determination of acute oral, dermal, eye, and inhalation toxicity is usually the initial step in the assessment and evaluation of the toxic characteristics of a pesticide active ingredient or end-use formulation. These data provide information on health hazards likely to arise when applying the product or when exposed soon after application. Under FIFRA, subchronic and chronic toxicity tests are examples of long-term toxicity tests required for active ingredients.

Additionally, all inert ingredients in pesticide products, including those in an inert mixture that may be added to other approved pesticide products, must be approved for use by EPA. As a part of EPA’s evaluation of a pesticide product, the product’s composition is examined to verify that all of the inert ingredients proposed for use in the pesticide formulation have been approved by EPA. Just as with individual inert ingredients, each component of an inert mixture must be supported by a battery of toxicity data and must be approved for use by EPA.

The hazard potential of a formulated pesticide product is assessed through evaluation of the relative toxicity of the individual inert ingredients and pesticide active ingredients. If there are data to indicate risk for a formulated mixture, EPA evaluates the potential effects in our risk assessments. The human health risk

assessment process is conservative in that maximum legal use rates for applicators and maximum legal residue levels for dietary exposure assumptions are used, thus ensuring that when a pesticide is used according to the label, people are well protected.

Thanks, R.

Robert Daguillard

Office of Media Relations

U.S. Environmental Protection Agency

Washington, DC

+1 (202) 564-6618 (O)

Ex. 6

From: Carey Gillam

Ex. 6

Sent: Thursday, May 18, 2017 10:50 AM

To: Milbourn, Cathy <Milbourn.Cathy@epa.gov>; Daguillard, Robert <Daguillard.Robert@epa.gov>

Subject: question on formulated product testing

Greetings guys - hoping you both are doing well. I need clarity on an issue that continues to percolate in this glyphosate/Roundup debate. Does the EPA **require** long term toxicity studies for full formulated pesticide products such as Roundup or only for the active ingredients in those products?

You probably are aware that many people make this assertion but the EPA information on this topic posted on various web pages is a bit ambiguous.

Could you please provide clarification on this issue?

Best regards,

Carey Gillam

Ex. 6