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**From:** Daguillard, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BBE9682B940C4F2C90732E4D37355DD4-DAGUILLARD,]  
**Sent:** 6/18/2018 12:22:20 PM  
**To:** Carey Gillam [Ex. 6]  
**Subject:** RE: question on FIFRA definition

Good morning Carey,

Checking.

Cheers, R.

Robert Daguillard  
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[Ex. 6] (M)

**From:** Carey Gillam [mailto:[Ex. 6]]  
**Sent:** Monday, June 18, 2018 8:12 AM  
**To:** Daguillard, Robert <Daguillard.Robert@epa.gov>  
**Subject:** question on FIFRA definition

Greetings and Happy Monday. I have a quick question hoping you can answer without much trouble. This has to do with providing a definition of FIFRA - I see this, which appears to have been updated last April 2017, on the EPA website:

**The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) provides for federal regulation of pesticide distribution, sale, and use. All pesticides distributed or sold in the United States must be registered (licensed) by EPA. Before EPA may register a pesticide under FIFRA, the applicant must show, among other things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment."**

**FIFRA defines the term "unreasonable adverse effects on the environment" to mean: "(1) any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide, or (2) a human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act."**

This definition is quoted by Cornell and is on many other websites as well as an overarching definition. So my question - is this still the correct, operative general overview description for FIFRA? Someone from Consumers Union said this was not correct, but it's on the EPA website, so I assume it still is. This is for a project being completed and turned in today. Can you confirm?

**Best regards,**

**Carey Gillam**  
**Author of Whitewash - The Story of a Weed Killer, Cancer and the Corruption of Science**

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