

Message

From: Schwab, Justin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EED0F609C0944CC2BBDB05DF3A10AADB-SCHWAB, JUS]
Sent: 5/26/2017 7:45:46 PM
To: Joe Bischoff [JBischoff@cgagroup.com]
CC: Tim Lust [tim@sorghumgrowers.com]
Subject: Re: Impact of recent changes to risk assessment

Thank you for this. I will make sure it gets to the right policy people here.

Sent from my iPhone

> On May 26, 2017, at 3:20 PM, Joe Bischoff <JBischoff@cgagroup.com> wrote:

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> Justin,
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> My apologies for taking so long to get back to you with examples of how things have significantly changed in the registration and re-registration of pesticides in recent years. I am still gathering examples, as they are a more difficult to tease out than I initially anticipated but they remain very much real and impactful to growers.
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> We know that there have been significant changes to risk assessment, not through stakeholder engagement or notice and comment but through fiat. These changes were first signaled by Dr. Thomas Burke (Former Dep. Assistant Administrator at EPA) in 2009 when he presented, "New Directions for Risk Assessment in the Incoming Administration and Beyond" to the Wharton School of Business. While the changes were done through policy and model shifts within the agency the impacts have been profound.
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> HERBICIDE
> The first example is in regards to Atrazine, which is the second most widely used herbicide in the United States, primarily on corn, sorghum, soybean and sugarcane production. Atrazine has been around for more than 50 years and few chemicals have been studied more closely. Atrazine is currently going through re-registration at EPA, as it did in 2003, but this time through significant policy changes appear to have been made and the goalposts moved. Below I have provided a list of some of the major concerns. Attached, you'll find two documents that provide additional details about these concerns. One document (ATZ summary) was produced by folks at Syngenta. The other document (ATZ EPA Review Memo) was produced through the Triazine Network which is a coalition of grower organizations, including the National Sorghum Producers).
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> * EPA ignored the recommendations of their own Science Advisory Panels (2007, 2009, 2012) in setting aquatic level of concern (LOCs).
> * Preliminary assessment focuses on models that clearly overestimate potential environmental concentrations of atrazine in water and ignores real-world and robust data taken over a 10 year period that completely contradicts the imaginative models used by EPA.
> * Different outcomes despite the same information
> * In 2003 EPA concluded "atrazine is practically non-toxic to slightly toxic to birds and mammals". But in 20016, despite the thresholds remaining unchanged EPA concluded that atrazine posed a chronic risk to mammals.
> * In 2003 EPA concluded "atrazine is practically non-toxic to slightly toxic to birds." But in 2016 EPA concluded that there was acute risk for plant-eating, insect-eating and omnivorous birds for nearly all use patterns.
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> PESTICIDES AND POLLINATORS: Decisions based on hazards and not on risk assessment
> I have attached the National Sorghum Producers' comments on the registration of sulfoxaflor (EPA-HQ-OPP-2010-0889) and a 2015 letter from EPA to the registrants instructing them not to pursue further neonicotinoid uses. I provided these two documents to help illustrate how OPP has made registration decisions that were influenced by the NGO outcry about honeybees and other pollinators without documenting risk (e.g., exposure). These are hazard-based decisions that have been repeated over and over and are not in keeping with a risk-benefit evaluation as required under FIFRA. Below I have highlighted some of the specific concerns captured and further explained in the attached documents.
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> * EPA identified the hazard and assumed a harmful exposure without data to support their assumptions.
> * Crops like sorghum, soybean and citrus were prevented from being registered uses, keeping a useful tool out of producers hands.
> * EPA's letter prohibiting new neonic registrations has kept cost effective tools out of growers hands do to their "no risk" approach to bees.
> * Sorghum faces a new and devastating pest (sugarcane aphid). Studies have shown that an imidacloprid in-furrow treatment would be effective and inexpensive for this low-input cost crop.

