

From: [Councell, Terry](#)
To: [Wirtz, Mark S](#)
Subject: FW: Glyphosate Discussion with Beyond Pesticides
Date: Monday, January 04, 2016 11:36:00 AM
Attachments: [EPA glyphosate testing letter2015.pdf](#)

Can I come (b) (5) ?

From: Miller, David [mailto:Miller.DavidJ@epa.gov]
Sent: Monday, January 04, 2016 11:34 AM
To: Councell, Terry
Subject: FW: Glyphosate Discussion with Beyond Pesticides

Hello Terry,

Mostly for FYI – any thoughts, concerns, or additional info you might want to add. It is ok for us to tell Beyond Pesticides that FDA is testing for this?

David.

From: Miller, David
Sent: Monday, January 04, 2016 11:32 AM
To: Smith, Charles <Smith.Charles@epa.gov>
Cc: Hrdy, David <Hrdy.David@epa.gov>; Bloem, Thomas <Bloem.Thomas@epa.gov>; Steve Nako <Nako.Steve@epa.gov>
Subject: RE: Glyphosate Discussion with Beyond Pesticides

Yes. The PDP testing we are a planning on will be oils/syrups. Combined with the raw grain testing being done now by FDA, I think we will have a good picture on this and story to tell.

Might be useful for us to take a look in advance of the meeting and remind ourselves of the results of the 300 samples in PDP so we are up to date on that. Beyond Pesticides obviously is well are of these and may bring up specifics.

Steve N. – could you please either get these from Tom B. or download them from PDP website. Just the soybeans. I will contact Terry C. to be sure we can say FDA is testing them and can characterize what FDA is doing (and when they will have the results) a bit better –and be sure FDA is ok with us mentioning this to Beyond Pesticides.

David.

David.

From: Smith, Charles

Sent: Monday, January 04, 2016 11:21 AM

To: Miller, David <Miller.DavidJ@epa.gov>

Cc: Hrdy, David <Hrdy.David@epa.gov>; Bloem, Thomas <Bloem.Thomas@epa.gov>

Subject: RE: Glyphosate Discussion with Beyond Pesticides

Dave,

I have cc'd Tom since he is the chemist and risk assessor.

I think one more is that they see the high hits in soybean as a problem where we see it as reasonable because of how the use pattern is...basically just prior to harvest.

Another thing to make sure is addressed is that glyphosate is utilized a lot on crops that are heavily processed, which we expect to significantly reduce residues. This may be addressed by some of the upcoming planned testing.

Thanks!

Charles " Billy" Smith
Branch Chief RAB1
Health Effects Division
Office of Pesticide Programs
703-305-0291

From: Miller, David

Sent: Monday, January 04, 2016 11:11 AM

To: Smith, Charles <Smith.Charles@epa.gov>

Cc: Hrdy, David <Hrdy.David@epa.gov>

Subject: FW: Glyphosate Discussion with Beyond Pesticides

FYI – letter – and request – seem reasonable.

We will likely need to bring up our rationale for doing less of this than they'd like or feel is appropriate. I think doing worst case on the RA (100% CT and tolerance level residues) is a first good rational. That it takes out a whole commodity and can't be done via MRL is a second one. And that FDA is looking at it now and PDP will be next year is a third.

David.