
From: Sack, Chris A
Sent: Tuesday, January 12, 2016 11:13 AM
To: Robin, Lauren P
Cc: South, Paul; Liang, Charlotte; Kashtock, Michael E
Subject: FW:

FYI

Chris

Ph: 240-402-2464

From: Sack, Chris A
Sent: Friday, January 08, 2016 10:39 AM
To: Chamkasem, Narong; Sisk, Ronald L
Cc: Cooper, Kara; Yeung, Andrew; Councell, Terry
Subject: RE:

Good work Narong!

Before you (b) (5), you need to know (b) (5)
(b) (5) You are correct that honey has no tolerance listed for glyphosate, but there are good reasons for that. The pesticide tolerances are established as a result of their registration with EPA. In that process a chemical company applies for a registration to use a specific chemical on a specific matrix in specific settings based upon the proper application of pesticides to foods to ensure their effectiveness to remove pests and safety from exposure. Only a handful of pesticides, e.g. coumaphos, have been registered for use on beehives; normally to address pests that attack bees. Only those pesticides are actually applied to bees and beehives. There are a few other generic food handling establishment and food service establishment tolerances, e.g. chlorpyrifos, that would apply to honey as it is processed. Any other pesticide that gets into honey would most likely be introduced by the bees themselves.

Glyphosate is the most widely used herbicide in the world. It is an indiscriminate herbicide that kills all foliage. Nobody is applying glyphosate to bees, beehives, or honey. The bee farmers are not breaking any laws; rather glyphosate is being introduced by the bees. When EPA was setting tolerances (b) (5) did not include honey in glyphosate tolerances. EPA has been made aware of this problem; and the honey industry is pursuing inadvertent tolerances for glyphosate and other pesticides. It will be interesting (b) (5) In recent re-evaluations of glyphosate exposure and toxicity EPA has confirmed that glyphosate is almost non-toxic to humans and animals. So, while the presence of glyphosate in honey is technically a violation, it is not a safety issue. FDA is working (b) (5) not a safety threat.

Having said that, the (b) (5) for FDA to evaluate the (b) (5)
(b) (5) From the survey data we will (b) (5)
(b) (5)

Thanks again Narong for your outstanding work with glyphosate.

Have a nice weekend,

Chris

Ph: 240-402-2464

From: Chamkasem, Narong
Sent: Friday, January 08, 2016 9:30 AM
To: Sisk, Ronald L
Cc: Cooper, Kara; Sack, Chris A; Yeung, Andrew; Councell, Terry
Subject: RE:

Yesterday, I analyzed the samples below and found glyphosate 41 ppb (ATL), 107 ppb (NOL), and 22 ppb (FLA).

I think there is no tolerance for glyphosate in honey for US (40CFR180.364) and EU has MRL of 50 ppb. The LOQ of my method is 25 ppb.

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From: Sisk, Ronald L
Sent: Wednesday, January 06, 2016 12:14 PM
To: Chamkasem, Narong
Cc: Cooper, Kara
Subject:

The honey sample from Atl—Sue Bee Honey
Sioux Honey Assn. Sioux City, Iowa

Nol—Carmichael’s Honey LLC
Youngsville, Louisiana

Fla---Leighton’s Orange Blossom Honey
Haines City, Florida