Endosulfan Impact Assessment Information Request

From: Ted Rogers

Sent: Tuesday, May 19, 2009 11:17 AM

To: ckk3@cornell.edu; jim@sripmc.org; Ayers, John; Olsen, Larry; Herbst, Linda; Jess, Lynnae;

Melnicoe, Rick; Toth, Steve

Cc: Chin, Teung; scottr@manainc.com **Subject:** endosulfan registration issues

Greetings,

As you may know endosulfan is under continuing regulatory review exacerbated by a petition by NRDC and PANNA requesting cancellation and revocation of all tolerances.

EPA made several additions to the Docket on May 6, 2009 and are requesting comment by July 6, 2009. Comment is being requested on the Agency's endosulfan impact assessments for eight crops (potato, tomato, cotton, apple, cucumber, squash, pumpkin and melons) and additional information on the importance of endosulfan use in agriculture.

The docket may be viewed

at http://www.regulations.gov/fdmspublic/component/main?main=DocketDetail&d=EPA-HQ-OPP-2002-0262

The relevant documents appear at the end of the 7 page docket and are dated 05/06/2009. Makhteshim Agan the registrant is sponsoring a conference call tentatively planned for May 29 concerning the impact of removal of aerial applications from the label and extending reentry intervals from the current 1 or 2 days to 15-22 days depending on crop.

In addition to comments on the eight impact assessments, EPA is seeking benefits information/data for the following crops: Almond, Apricot, Blueberry, Broccoli, Brussels sprouts, Cabbage, Carrots, Cauliflower, Celery, Citrus (nonbearing trees and nursery stock), Collard greens, Crops grown for seed (alfalfa, cabbage, collard greens, cucumber, kale, kohlrabi, melons, pumpkin, radish, rutabaga, squash, turnip), Dry beans, Dry peas, Eggplant, Filbert, Kale, Lettuce, Mustard greens, Nectarine, Ornamental trees, Shrubs, and Woody plants, Plum and Prune, Sweet corn, Sweet potato, Strawberry, Tobacco, Turnip, and Walnut.

Please distribute this information to your specialists and suggest that if they have concerns about the issues sited that they contact (and copy to me):

Scott Rawlins

Director, Governmental Relations & Trade Makhteshim Agan of North America Telephone: 919-256-9324

Mobile: 443-762-5377

So that they might be contacted when the conference call plans are finalized.

Please do not hesitate to contact me if you have any questions or comments.

Best,

Ted Rogers

Biologist, Senior Policy Analyst USDA Office of Pest Management Policy 202-720-3846

The Western IPM Center is headquartered in the UC Agriculture and Natural Resources Building at 2801 Second Street, Davis, CA 95618.