Good Afternoon Larry,

The Department does recommend the Section 3 registration path. However, EPA staff would be the ones to answer any questions regarding the best path for you to take regarding if they would allow a waiver or require the full pollinator studies. These are not questions that I can answer. The contacts at the EPA Registration Division that could assist you and answer questions regarding your Section 3 submittal are:

Marion Johnson; johnson.marion@epa.gov; 703-305-6788
Richard Gebken; Gebken.richard@epa.gov; 703-305-6701

Hope this helps,

Amy

Amy N. Brown, CPM, CGMP
Environmental Administrator
Bureau of Scientific Evaluation & Technical Assistance, Pesticide Registration Review Section
Division of Agricultural Environmental Services
Florida Department of Agriculture and Consumer Services

(850) 617-7913 office
(850) 661-7044 cell
Amy.Brown@FreshFromFlorida.com

3125 Conner Blvd. Bldg. 6
Tallahassee, Florida 32399

www.FreshFromFlorida.com

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.
Thanks for your email, and suggestion that we pursue a Section 3 registration. And also for your kind offer to help us with getting it approved. Though we can, of course, apply for a FIFRA Section 3 registration, we have been informed by our regulatory consultant, Pyxis, that it will take 2-3 years to conduct the Tier 1 and Tier 2 pollinator studies that are now required of all Section 3 applications, and then another year or so for EPA to review our application and make a regulatory decision. So we are looking at a minimum of three years before aldicarb would be available for use on Florida citrus and more likely 4-5 years.

We could, perhaps, immediately apply for a Section 3 registration if EPA would waive the pollinator requirement as a condition of our Section 3 registration submittal. This could allow for registration by the end of 2019 which would greatly benefit the citrus industry. Since aldicarb production and use ended, Florida citrus growers have lost over 80% of their production capacity, and affirmed in sworn affidavits, that aldicarb is unique, in that unlike currently registered products, it also provides increased tree vigor and higher yields. There are over 55 Bayer studies documenting this.

As you know, aldicarb is much less detrimental to bees and beneficials, than most of the existing products used on citrus and certainly less harmful than products that are applied by foliar spray during the blooming period. Therefore, would it be possible for FDACS to support us in our request for a waiver of the pollinator studies?

As you know for Section 3 registrations EPA does not require the submission of comparative efficacy studies.

Let’s work together to help resolve any existing issues and potentially help Florida growers and researchers, who have clearly stated that they need aldicarb back to help not only their citrus productivity but also the survival of this iconic industry.

Await your thoughts

Larry Hodges, Ph.D
Director Regulatory Affairs

---

From: Brown, Amy [mailto:Amy.Brown@freshfromflorida.com]
Sent: Thursday, August 23, 2018 4:45 PM
To: Larry Hodges <larryhodges@meycorp.com>
Cc: Antoine Puech <antoinepuech@meycorp.com>; Daiker, Dave <Davis.Daiker@freshfromflorida.com>; Friend, Kelly <Kelly.Friend@freshfromflorida.com>; Conti, Lisa <Lisa.Conti@freshfromflorida.com>; Hall, Steven <Steven.Hall@freshfromflorida.com>; Joyner, Michael <Mike.Joyner@freshfromflorida.com>; Frazier, Courtney <Courtney.Frazier@freshfromflorida.com>
Subject: RE: Withdrawal of SLN for the Use of AgLogic 15GG on Citrus
Dr. Hodges,

Thank you for the email and letter. The EPA’s questions and your responses to them have no bearing or impact on the Department’s decision regarding your pending application for the special local need registration. Even if you satisfy the questions raised by EPA in their August 15, 2018 letter, your pending SLN application to the Department fails to meet the minimum requirements for the reasons we discussed yesterday during our conference call.

The Department accepts your withdrawal of the pending Special Local Need registration of AgLogic 15GG effective August 31, 2018. After the pending application is withdrawn, the application may be revised and resubmitted with new information that meets the minimum requirements for a SLN registration. However, I would reiterate that the Department has fundamental concerns about the ability of this product to meet those requirements and strongly recommends seeking a Section (3) registration with EPA. The Department believes this is the best and most efficient course of action to bring this product to market in Florida for the citrus industry. The Department stands ready to assist you with that registration process with EPA to the extent of our abilities.

Please let me know if you have any questions.

Sincerely,

Amy Brown

Amy N. Brown, CPM, CGMP
Environmental Administrator
Bureau of Scientific Evaluation & Technical Assistance, Pesticide Registration Review Section
Division of Agricultural Environmental Services
Florida Department of Agriculture and Consumer Services

(850) 617-7913 office
(850) 661-7044 cell
Amy.Brown@FreshFromFlorida.com

3125 Conner Blvd. Bldg. 6
Tallahassee, Florida 32399

www.FreshFromFlorida.com

Please note that Florida has a broad public records law (Chapter 119, Florida Statutes). Most written communications to or from state employees are public records obtainable by the public upon request. Emails sent to me at this email address may be considered public and will only be withheld from disclosure if deemed confidential pursuant to the laws of the State of Florida.

---

From: Larry Hodges <larryhodges@meycorp.com>
Sent: Wednesday, August 22, 2018 4:33 PM
To: Brown, Amy <Amy.Brown@freshfromflorida.com>
Cc: Antoine Puech <antoinepuech@meycorp.com>
Subject: Withdrawal of SLN for the Use of AgLogic 15GG on Citrus

Dear Ms. Brown,
AgLogic Chemical LLC is submitting the attached letter regarding the voluntary withdrawal of our application for a FIFRA Section 24(c), Special Local Need, registration for the use of AgLogic 15GG (EPA Reg. No. 87895-4) on citrus dated June 1, 2018.

Sincerely,

Larry Hodges, Ph.D
Director Regulatory Affairs