

Message

From: Rust, Mary [Rust.Mary@epa.gov]
Sent: 3/4/2021 3:19:02 PM
To: TenBrook, Patti [TenBrook.Patti@epa.gov]
Subject: RE: Your Inquiry to EPA

Thanks.

It is crazy. Being a scientist, I am getting copied on their response to the issue and how they have been ignored for years. It's interesting to be able to "see" all of this play out from the comfort of my daughter's bedroom (LOL) 😊
Thank you also for sharing the researcher exemption. Makes sense.
Hope that you have a great day.
m

From: TenBrook, Patti <TenBrook.Patti@epa.gov>
Sent: Thursday, March 04, 2021 10:10 AM
To: Rust, Mary <Rust.Mary@epa.gov>
Subject: RE: Your Inquiry to EPA

Thanks, Mary. I do appreciate what you're doing. It has to be awfully difficult, esp. when an issue gets sparked.

On the off-label use part of this story, it turns out that California's Research Authorization rules (i.e., the state's version of Experimental Use Permits) exempt academics from needing authorization. Here are the pertinent parts of their code.

CA DPR Research Authorization (RA)—California Code excerpts

A California Research Authorization is required for any experimental unregistered use of a pesticide in CA, regardless of size of the test plot. There are exceptions, which are noted below. (CCR 6260)

Exemptions from requirement of an RA: 1) RA is not required if the registrant operates the property on which the research is to be conducted; 2) Personnel employed by colleges and universities and engaged in pesticide research, are exempt from RA requirement if they are operating according to an established pesticide use and experimentation policy of the college or university. (CCR 6268)

Regards,
Patti

"I can never be what I ought to be until you are all you ought to be." Martin Luther King, Jr.

Patti L. TenBrook, Ph.D.
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From: Rust, Mary <Rust.Mary@epa.gov>
Sent: Thursday, March 4, 2021 5:56 AM
To: TenBrook, Patti <TenBrook.Patti@epa.gov>
Subject: RE: Your Inquiry to EPA

Hi Patti,

Yes, I understand, and I know that was a lame 'template' response. Being a lowly ombudsperson, I have been waiting all day to hear what kind of response the senior leaders want to convey, but I have not heard. Still waiting to log in this morning. I knew you wanted a response quickly, so I sent what I could. I'm hoping that we will have some kind of statement to release soon.

Thanks,
Mary

From: TenBrook, Patti <TenBrook.Patti@epa.gov>
Sent: Wednesday, March 03, 2021 6:08 PM
To: Rust, Mary <Rust.Mary@epa.gov>
Subject: RE: Your Inquiry to EPA

Thanks, Mary. I am a little concerned because I think his inquiry started with the adverse effects reporting branch (his note was to Robert Miller). This is a scientist who wants to understand the incident data and possible adverse effects from flumethrin exposure. Is there someone who can help him with those questions?

Regards,
Patti

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From: Rust, Mary <Rust.Mary@epa.gov>
Sent: Wednesday, March 3, 2021 12:17 PM
To: jaimerudd@wildlife.ca.gov
Cc: TenBrook, Patti <TenBrook.Patti@epa.gov>
Subject: Your Inquiry to EPA

Dear Jaime,

Thank you for writing the Environmental Protection Agency's Office of Pesticide Programs.

We have forwarded the information you provided to our adverse effects reporting branch. Please be sure to follow up with your veterinarian and provide the same information you provided to us to ensure the best diagnosis and follow-up care. You might also want to contact the [National Pesticide Information Center](#), an EPA information-sharing partner that has staff who are specially trained in responding to pesticide exposure incidents, including those involving pets.

Also, we wanted to remind you that failure to follow EPA-approved label instructions on pesticide products is a violation of federal law. And, as indicated on all EPA-registered pesticide product labels, it can also be dangerous.

We hope you find this information useful. Please write us again if you have additional questions.

Kind Regards,

Office of Pesticide Programs

U.S. Environmental Protection Agency

<< OLE Object: Picture (Device Independent Bitmap) >>

From: Rudd, Jaime@Wildlife <Jaime.Rudd@wildlife.ca.gov>

Sent: Tuesday, March 02, 2021 4:19 PM

To: Miller, Robert <Miller.Robert@epa.gov>

Cc: Palmer-Townsend, Marilyn@CDPR <Marilyn.Palmer-Townsend@cdpr.ca.gov>

Subject: Flumethrin Question

Hi Robert –

I was just this article about flumethrin and was wondering if you had any additional info or who the proper contact would be,

<https://www.usatoday.com/story/news/investigations/2021/03/02/seresto-dog-cat-collars-found-harm-pets-humans-epa-records-show/4574753001/>.

We have been using Seresto collars on endangered San Joaquin kit foxes for the last 5 years (I actually did my dissertation on their safety and efficacy in preventing sarcoptic mange). This is a little concerning but I am not sure if there is a lot of merit to the reports or not and how I could find out what was reported. In the cases of domestic dogs mortalities, it seems mortality occurred 2-3 months after the collar was put on. We have not had any problems in kit foxes but it is a little concerning.

Sincerely,

~*~

Jaime Rudd, PhD

Pesticide & Disease Investigations

Wildlife Investigations Laboratory (WIL)

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Come see what we are about!

<https://wildlife.ca.gov/Conservation/Laboratories/Wildlife-Investigations>