



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

February 1, 2012

Steven Bradbury
Director, Office of Pesticide Programs
U.S. EPA
2777 South Crystal Drive
Arlington, VA 22202

Via Electronic Mail

Dear Mr. Bradbury:

At the December 5, 2011 meeting of the State FIFRA Issues Research and Evaluation Group (SFIREG), Ms. Catherine Eiden of the Pesticide Re-evaluation Division presented the Agency response to the September 6, 2011 letter forwarding the Issue Paper titled “Endangered Species Act Consultation for Pesticide Registration”. We have completed our review of this response and agree with the Agency’s approach to the issue of incorporating ecological risk evaluation and risk to endangered species as part of the registration review process.

We are very encouraged by the Agency’s effort to incorporate input from relevant stakeholders into the endangered species risk evaluation portion of the registration review process, and want to act to support that effort. We also want to support efforts to increase informal communication on pesticide issues between the Agency and the Services. We agree that in light of these efforts, third party mediation is not needed at this time.

In order to actively support these initiatives, we propose the following – inclusion of a representative of the EQI on the PPDC workgroup developing a process to incorporate input into the registration review that will address ESA issues, and the promotion of opportunities to meet with state level staffers of the Services. These meeting opportunities can occur at SFIREG committee meetings, Regional pre-SFIREG meetings, or through opportunities organized by SLAs.

As part of our efforts in this area, the EQI Committee will continue to track this issue and the results of the National Academy of Science review of the science issues associated with evaluation of pesticide risks to endangered species.

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Thanks once again for your responsiveness to the concerns and suggestions brought forth by the state regulatory programs. I continue to look forward to working with you and your staff on other pesticide regulatory issues.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

A handwritten signature in blue ink, appearing to read "Adam H. Putnam", written in a cursive style.

Steven E. Dwinell, SFIREG Chair