

Message

From: HEYDENS, WILLIAM F [Redacted]
on behalf of HEYDENS, WILLIAM F [Redacted]
Sent: 2/19/2014 5:27:30 PM
To: [Redacted] [Redacted]
[Redacted] [Redacted]
[Redacted]
Subject: RE: Surfactants

[Redacted]

Is your CAER group still in existence and operational?

Over here, I occasionally hear 'noise' about a small subset of JGTF registrants forming a group to address POEA issues arising in Canada/US, but I don't think there has been much traction...

I will continue to work with Donna to turn her manuscript into an actual publication, hopefully still in 2014. Overall timing will depend on if/how we decide to expand the scope of the current form of the manuscript.

I am very willing to help out in this area any way I can.

Bill

From: [Redacted]
Sent: Wednesday, February 19, 2014 10:58 AM
To: HEYDENS, WILLIAM F [Redacted] [Redacted] [Redacted]
Subject: RE: Surfactants

Bill,

Surfactants are and will stay to be a hot topic in EMEA and other world areas. In the EU we will be facing a negative list of co-formulants (Annex III to regulation 1107/2009) and we can bet tallowamines will be on there for all the wrong reasons. We need to avoid that the tallowamine-issues spreads to POEA's and related chemistries (etheramine oxides).

We need an approach involving our suppliers that gets us off the authority's scrutiny hook and avoiding any global consequences when developing additional data.

We should discuss.

Regards,

Redacted

From: HEYDENS, WILLIAM F Redacted

Sent: donderdag 13 februari 2014 0:38

To: Redacted Redacted Redacted

Subject: RE: Surfactants

All,

I wanted to check again and see if there is interest in generating "pro-surfactant" publications.

Redacted as you saw from a separate e-mail, I am encouraging David to pick up the in vitro paper again.

And then there is the draft surfactant manuscript from Donna that could be dusted off and enhanced.

And we could probably do a lit search of acute data on surfactants and show in more detail that agricultural surfactants are no more toxic than ones we are exposed to in a variety of products every day. We have a small handful of examples, but we could likely come up with a more expansive list to make a more powerful statement.

Should we pursue any of this or other work on surfactants? Or is the plan to totally move away from POEA in the EU and be done?

Thanks.

Bill

From: HEYDENS, WILLIAM F [Redacted]

Sent: Wednesday, January 22, 2014 8:48 AM

To: [Redacted]

[Redacted]

[Redacted]

Subject: Surfactants

[Redacted]

In preparation for my mid-year review with my boss in a couple weeks, I have been reflecting on things accomplished, but also thinking about things that yet need to be addressed. One of those things is maintaining/securing FTO for surfactants. We have done a great job focusing on glyphosate defense, but there are battles to be waged on the surfactant front.

In that light, over the last couple years we have done a good job of getting key glyphosate publications out these. Should we now be working on publications for surfactants? For example, you may recall that we presented a surfactant poster at the 2006 Society of Toxicology meeting (see attached), and Donna took the next step of turning it into a draft manuscript in 2008, but it has set dormant since then. Would there be value in resurrecting it and pushing it across the finish line? I briefly checked Donna's pulse on this and she is willing to re-engage. (There is an issue of not being able to identify exact composition or suppliers, but hopefully we can work through that) Is there any other theme we should tackle? For instance, and I don't know hard this would be to do, but would there be value in reviewing what data is available on general soaps/detergents etc. and showing (hopefully) that agricultural surfactants are no worse or possibly better? Or maybe we try to build that into the existing manuscript.

Also I know Mitch has vocalized that he intends to publish his recent E-fate data, but I have no idea what timeline he is thinking about. Likewise, I don't know what the Ecotox folks might be up to.

Anyway, I'd appreciate your thoughts before trying to rally the troops. Thanks.

Bill