



# At a Glance

## Why We Did This Audit

The U.S. Environmental Protection Agency's Office of Inspector General conducted this audit to review the EPA's adherence to applicable regulations, policies, and procedures in assessing the risks of pesticides to human health and the environment during the pesticide registration process.

Pursuant to Federal Insecticide, Fungicide, and Rodenticide Act requirements, the EPA's Office of Pesticide Programs regulates all pesticides that are sold and distributed in the United States. For each pesticide registration application, the OPP has the discretion to *unconditionally register* the pesticide under FIFRA Section 3(c)(5) if the application is complete and all criteria are met or to *conditionally register* the pesticide under FIFRA Section 3(c)(7) if additional data are needed.

### This audit addresses the following:

- *Ensuring the safety of chemicals.*

### This audit addresses a top EPA management challenge:

- *Complying with key internal control requirements (data quality).*

Address inquiries to our public affairs office at (202) 566-2391 or [OIG\\_WEBCOMMENTS@epa.gov](mailto:OIG_WEBCOMMENTS@epa.gov).

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## *EPA Mostly Adheres to Regulations When Assessing Risks of New Pesticides but Should Improve Internal Controls*

### What We Found

For the nine unconditional pesticide registrations we reviewed, we found that the OPP is mostly adhering to applicable regulations, policies, and procedures in assessing the risks of the pesticides to human health and the environment during the issuance process for unconditional pesticide registrations. Federal regulation 40 C.F.R. § 152.112, *Approval of registration under FIFRA sec. 3(c)(5)*, establishes eight criteria for the issuance of an unconditional pesticide registration. The OPP fully complied with four of these criteria, while two were not applicable to the pesticide registrations that we reviewed. The two remaining criteria address, in part, toxicology and ecological data requirements that the OPP must assess to determine whether the pesticide's intended use will have unreasonable adverse effects on human health and the environment. For these two criteria, the OIG:

**By implementing stronger internal controls, the EPA can decrease the risk of issuing a pesticide registration that does not comply with regulatory requirements.**

- Independently verified that the OPP met all toxicology data requirements. The OPP develops a summary table addressing toxicology data requirements for pesticide registrations.
- Could not independently verify that the OPP met all ecological data requirements. The OPP does not develop a summary table addressing ecological data requirements for pesticide registrations.

In addition, the OPP lacks a standard operating procedure governing how to conduct initial pesticide registrations to ensure adherence to 40 C.F.R. § 152.112. The lack of an ecological data requirement summary table and a standard operating procedure for initial registrations increases the risk that the OPP will issue a pesticide registration that does not comply with the pesticide registration statutes and regulations.

### Recommendations and Planned Agency Corrective Actions

We make two recommendations to the assistant administrator for Chemical Safety and Pollution Prevention: (1) develop and incorporate an ecological data requirement summary table or similar internal control into the OPP's ecological risk assessments and (2) develop and implement a standard operating procedure for the initial registration of a pesticide. The Agency provided acceptable corrective actions, and both recommendations are resolved with corrective actions pending.