U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining

Report No. 14-P-0322 **July 24, 2014**

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Abbreviations

CRRP	Conventional Reduced Risk Pesticide
EPA	U.S. Environmental Protection Agency
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
IR-4	Interregional Research Project No. 4
OIG	Office of Inspector General
OPP	Office of Pesticide Programs
PRIA	Pesticide Registration Improvement Act
USDA	U.S. Department of Agriculture

Cover photos: *From left:* ground-based equipment applying agricultural chemicals; crop-duster applying agricultural chemicals by air. (EPA photos)

U.S. Environmental Protection Agency
Office of Inspector General

14-P-0322
July 24, 2014

At a Glance

Why We Did This Review

We conducted this review of the U.S. Environmental Protection Agency's (EPA's) Conventional Reduced Risk Pesticide (CRRP) Program to determine whether it was meeting its goal of reducing risks to human health and the environment by encouraging the development, registration and use of pesticide products that are lower risk.

Pesticides are widely used in agricultural, commercial and household settings. Once released into the environment, pesticides have the potential to pollute rivers, groundwater, air, soil, wildlife and food. The EPA developed the CRRP Program to quickly register reduced risk alternatives to those currently on the market. Reduced risk pesticides are designed to be less harmful to humans, birds, fish and/or plants; have lower potential for groundwater contamination; and require lower application rates.

This report addresses the following EPA goal or cross-agency strategy:

- *Ensuring the safety of chemicals and preventing pollution.*

For further information, contact our public affairs office at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2014/20140724-14-P-0322.pdf

Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining

What We Found

The number of newly registered reduced risk pesticides may continue to decline unless the EPA can reduce barriers to participation.

The impact of the CRRP Program has declined over the last 10 years. The CRRP Program is registering fewer reduced-risk pesticides compared to the number registered prior to the 2004 implementation of the Pesticide Registration Improvement Act (PRIA). In our opinion, PRIA is a factor in declining CRRP impact because it increased the cost to register reduced risk pesticides and decreased the time-to-market savings that reduced risk pesticides previously had over conventional pesticides. The EPA does not have the statutory authority to provide fee-reduction incentives for companies continuing to develop and register reduced risk pesticides.

Implementing steps to remove participation obstacles can increase participation and the impacts of the CRRP Program. Moreover, improving the measurement of the program's outcomes can more accurately capture the impacts of the CRRP Program. The program's existing performance measure focuses on the use of reduced risk pesticides in agriculture. The measure does not capture the complete population of CRRP products in the marketplace. For example, CRRP products used in non-agricultural markets—such as residences or around food products—are not captured, and the EPA has not developed ways to cost effectively collect non-agricultural use data.

Noteworthy Achievements

The CRRP Program has succeeded in bringing reduced risk pesticides to market since 1994. More than 727 reduced risk pesticide uses have been approved and reduced risk pesticides account for approximately 22 percent of farm acres treated in the United States each year. Also, the CRRP Program has successfully partnered with the Interregional Research Project No. 4 to make reduced risk pesticides widely available to a diverse population of growers.

Recommendations and Agency Response

We recommend that the Assistant Administrator for Chemical Safety and Pollution Prevention seek authority from Congress to reduce PRIA application fees for reduced risk pesticides to increase participation, and develop measures that better capture the impact of the entire CRRP Program. The EPA agreed with our recommendations and has proposed acceptable corrective actions. All recommendations are resolved.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

July 24, 2014

MEMORANDUM

SUBJECT: Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining
Report No. 14-P-0322

FROM: Arthur A. Elkins Jr.

TO: Jim Jones, Assistant Administrator
Office of Chemical Safety and Pollution Prevention

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The EPA office having primary responsibility for the issues evaluated in this report is the Office of Chemical Safety and Pollution Prevention's Office of Pesticide Programs.

Action Required

You are not required to provide a written response to this final report because you provided agreed-to corrective actions and planned completion dates for the report recommendations. The OIG may make periodic inquiries on your progress in implementing these corrective actions. Should you choose to provide a final response, we will post your response on the OIG's public website, along with our memorandum commenting on your response. You should provide your response as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

We will post this report to our website at http://www.epa.gov/oig.

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Purpose

We conducted this review of the U.S. Environmental Protection Agency's (EPA's) Conventional Reduced Risk Pesticide (CRRP) Program to determine whether it was meeting its goal of reducing risks to human health and the environment by encouraging registration of pesticides that are lower risk than existing alternatives.

Background

The EPA gets its authority to regulate pesticides under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).[1] The EPA defines a pesticide as any substance intended to destroy, prevent or repel pests, such as insects, weeds, fungi and rodents. Pesticides are an integral part of agriculture. Many household products are also pesticides, including insect repellents for personal use, weed killers, disinfectants and some swimming pool chemicals. Once released into the environment, pesticides have the potential to pollute rivers, groundwater, air, soil, wildlife and food. Pesticides are regulated by FIFRA through an application review and approval process. A product must be registered for each crop, indoor use, or use on or near food. To be used in other ways, the product must also be registered for those uses, either with the original application or in a separate application.

The CRRP Program is implemented by the Office of Chemical Safety and Pollution Prevention's Office of Pesticide Programs (OPP). The goal of this program is to promote the development and registration of lower-risk pesticides. These products are intended to reduce risks to human health and the environment when compared to existing conventional pesticides currently on the market. The CRRP Program expedites the review of reduced risk pesticide applications so that these products are available to growers as soon as possible. Expected participants in this program are the chemical companies that submit pesticide registration applications to the EPA. In return for making a reduced risk product and for participating in the CRRP Program, the manufacturer's registration application is expedited through the review process, shortening the process by up to 6 months.

To participate in the CRRP Program, the applicant must develop a "reduced risk rationale" document. The rationale outlines the reasons why the participant's product satisfies the CRRP criteria and should be identified as a reduced risk product. It includes risk comparison information between the chemical being considered for reduced risk status and chemicals currently in the marketplace for that use. The development of the rationale document can take hundreds of work hours to complete.

[1] 7 U.S. Code § 136a - Registration of pesticides.

The EPA cites a number of advantages to CRRPs over existing non-CRRPs, including low impact on human health; lower toxicity to non-target organisms (birds, fish, plants); low potential for groundwater contamination; low application rates; low pest resistance potential; and compatibility with Integrated Pest Management practices. The EPA notes there are marketing advantages to receiving reduced risk status, although companies are not allowed to put a reduced risk pesticide claim on their labels. Also, some end users give preference to crops treated with reduced risk pesticide products.

The CRRP Program began in 1992 and the EPA approved 14 reduced risk pesticides between 1993 and 1997. The Food Quality Protection Act of 1996 formalized the program in statute, mandating that the EPA provide guidance to the applicants and implement the CRRP Program by 1997. Until 2004, when the Pesticide Registration Improvement Act (PRIA) was passed, the EPA reviewed pesticides under a priority system set annually by growers, industry, manufacturers and the EPA working together. The chemicals or ingredients that were on the priority list each year were more likely to get reviewed.

In 2004, Congress amended FIFRA by adding PRIA to the statute.[2] The PRIA amendment did not change the way the EPA reviewed pesticide applications. PRIA instead established required timelines for the review of all applications, not just the chemicals prioritized under the traditional process. According to an industry representative, before PRIA was enacted the average time for a regular New Active Ingredient approval was 38 months, compared to 14 months for New Active Ingredient CRRP products. In 2014, the review timeframe fell to 24 months for non-CRRP products and 18 months for CRRP products.

Table 1: FY 2014-2015 New Active Ingredient pesticide fees and review time

Action decision	EPA review time (months)	FY 2014-2015 EPA registration service fee
New Active Ingredient, Food Use	24	$597,683
New Active Ingredient, Food Use, *Reduced Risk*	18	597,683
New Active Ingredient, Non-Food Use; Outdoor	21	415,241
New Active Ingredient, Non-Food Use; Outdoor, *Reduced Risk*	16	415,241
New Active Ingredient, Non-Food Use; Indoor	20	230,947
New Active Ingredient, Non-Food Use; Indoor, *Reduced Risk*	14	230,947

Source: OPP.

In addition to revising review timelines, PRIA also implemented pesticide registration service fees, which add costs to the registration process. The highest registration fees apply to "New Active Ingredients." As shown in table 1, while the EPA review time is reduced under PRIA the review time is still less for

[2] The original PRIA statute—passed in 2004—was in effect from March 23, 2004, until September 30, 2007, and is now referred to as PRIA 1. PRIA 2 was in effect from October 1, 2007, through September 30, 2012. PRIA 3 came into effect on October 1, 2012, and is slated to expire on September 30, 2017.

reduced risk pesticide registrations. The EPA's pesticide registration fees are the same regardless if it is a CRRP or non-CRRP.

Another significant participant in the CRRP Program is the Interregional Research Project No. 4, commonly known as IR-4. Sponsored by Rutgers University, IR-4 is a non-profit program that works in partnership with the U.S. Department of Agriculture (USDA), the land grant university system, the EPA, the agrochemical industry, commodity groups and growers. It is often not cost effective for the manufacturer to develop residue data to support registration for minor use crops like blueberries, strawberries or carrots. IR-4 conducts residue field trials and submits tolerance petitions for these minor use crops.

Noteworthy Achievements

The CRRP Program has been successful in bringing reduced risk pesticides to market since 1993. Fifty-six new reduced risk pesticides and 727 reduced risk pesticide uses for existing chemicals have been approved, and more than 20 percent of agricultural pesticides applied today are reduced risk products. This means that, each year, reduced risk pesticides are applied to approximately 20 percent, or 169 million acres, of U.S. farmland. Further, the CRRP Program has actively partnered with Rutgers University's IR-4 program to expand the use of CRRPs to additional crops.

Scope and Methodology

We conducted this audit from April 2013 to April 2014, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence obtained provides a reasonable basis for the results reported based upon our objective, and that our conclusions are sufficiently based on evidence collected during the course of this audit.

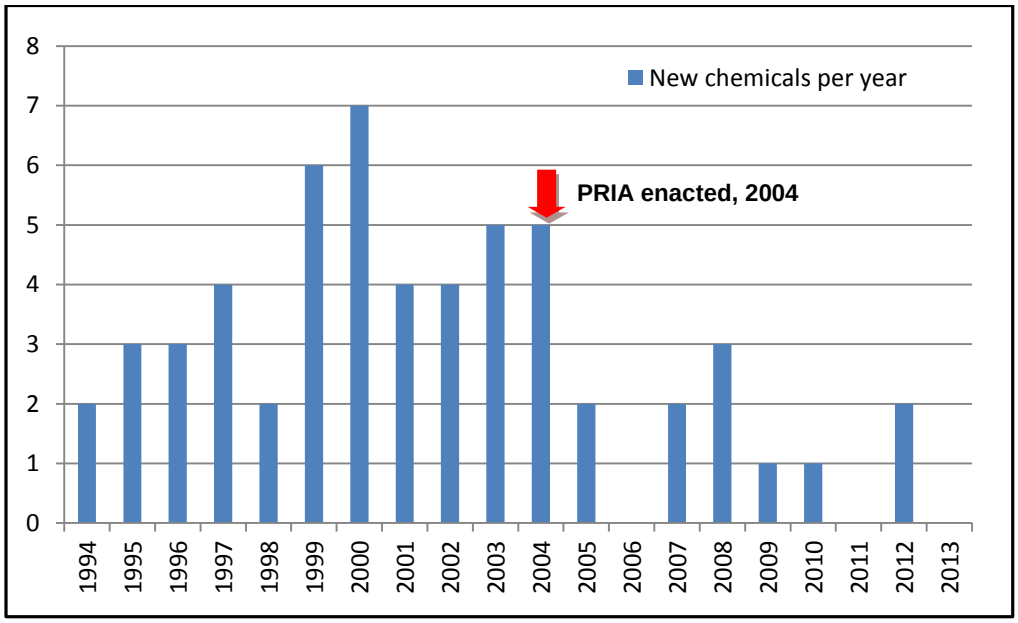
To address our objective, we reviewed and analyzed relevant federal statutes, regulations and guidance. We interviewed officials, managers and staff in OPP. We also reviewed five CRRP Program application documents to determine the type of information provided to the EPA to make its reduced risk decisions. Finally, we gathered information from several organizations that work with the EPA in the manufacture and registration of CRRPs.

CRRP Registrations and Participation Declined Following Statutory Changes

The impact of the CRRP Program has been declining for the past 10 years. The program is not registering as many CRRP products nor attracting as many CRRP applications as before the implementation of the PRIA 1.[3] One factor is that the PRIA pesticide registration service fees are the same regardless of whether an application is a CRRP or non-CRRP product. While the CRRP applicant could still get its product to market more quickly than a non-CRRP product, the applicant must weigh the time advantage against paying both the application costs and the CRRP-rationale development costs. Moreover, the time-to-market benefit from participation has reduced significantly since the inception of the program.

Challenges to the success of the CRRP Program were introduced with the passage of the original PRIA legislation. PRIA 1 not only introduced registration service fees, it also changed application review timeframes, which narrowed the gap between regular applications and CRRP application review. These review timeframe reductions continued with subsequent PRIA revisions. By the time PRIA 3 was enacted, reductions in all regular pesticide registration review timeframes had been established. As shown in figure 1, CRRP New Chemical registrations generally increased since the program was piloted in 1994, peaking in 2000, when seven New Chemical CRRP products were registered. After the implementation of PRIA 1, the number of new chemical registrations decreased by 71 percent, and there have only been 11 new chemical registrations since 2004.

Figure 1: New Chemical CRRP registrations per year, 1994–2013

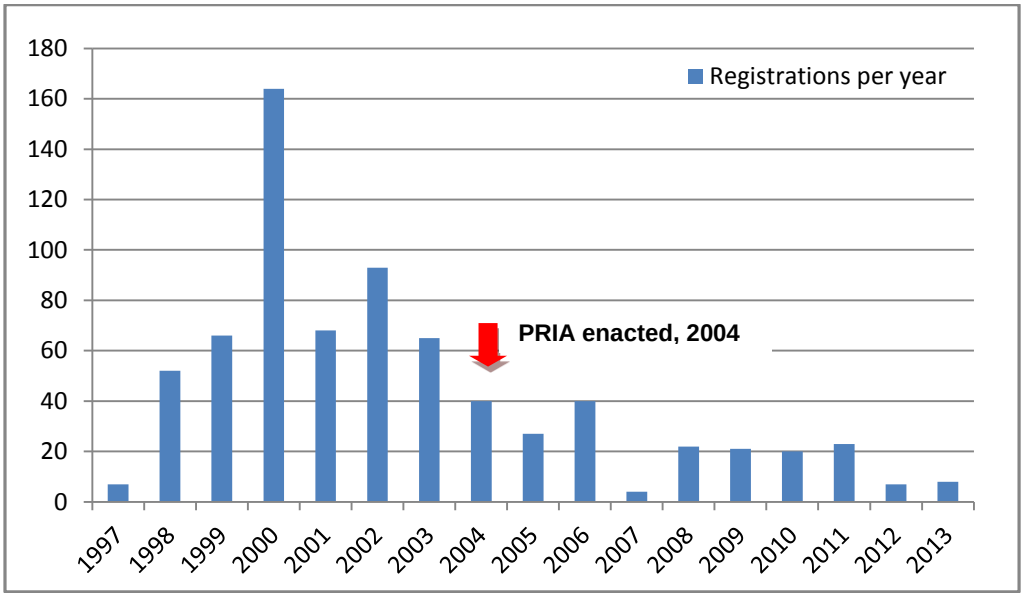


Source: Office of Inspector General (OIG) analysis of OPP data.

[3] An *application* is the submission of paperwork by the manufacturer seeking the registration of a reduced risk product. A *registration* means that the reduced risk application has been approved and the chemical is registered by the EPA as a conventional reduced risk product.

Similarly, the data in figure 2 illustrates that registration of New Uses for Existing Chemicals fell by 72 percent after PRIA 1 was enacted.

Figure 2: Existing Chemical, New Use CRRP registrations per year, 1997–2013



Source: OIG analysis of OPP data.

OPP staff agreed that PRIA has had a significant adverse impact on the number of applications received, and the number of registrations achieved, by the CRRP Program. The EPA has only an advisory role in specifying the timelines for application reviews and does not have the authority to change the fee schedule under PRIA. Further, OPP staff informed us that, in their opinion, the PRIA 3 review timeframes could not reasonably be reduced any further or the scientific review may not be sufficient. As a result, fee reductions seem to be the only viable option to increase participation in the CRRP Program.

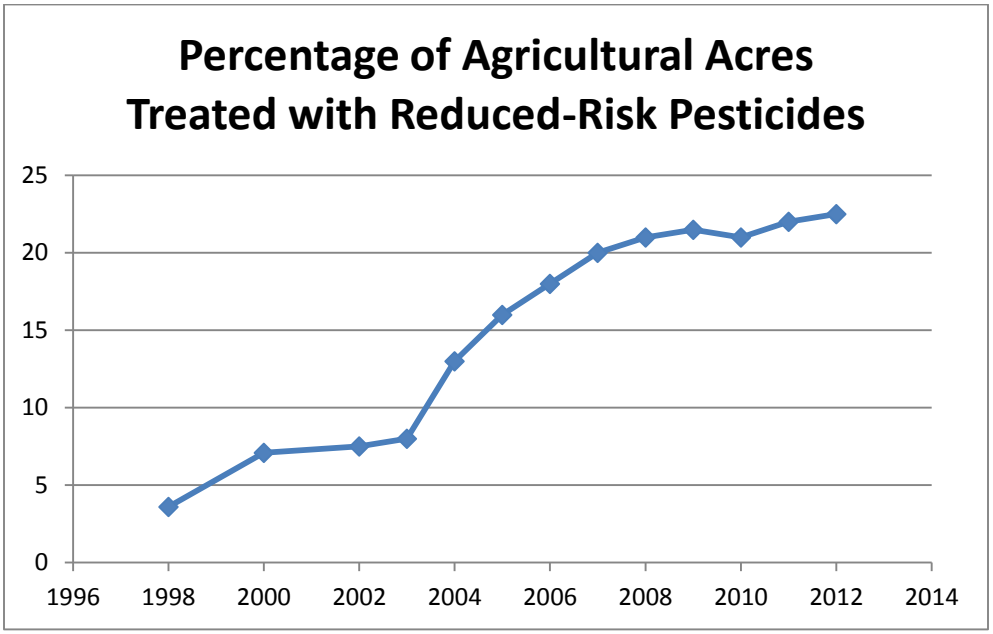
While the EPA does not have the authority to reduce registration service fees, the agency is authorized to exempt those registration applications associated with IR-4 submissions. With the decline in participation, the CRRP Program's human health and environmental impacts may also be declining. To encourage increased participation in the CRRP Program, the EPA should seek the authority to reduce the fees for CRRP applications. Even a 10-percent reduction for a "New Active Ingredient, Food Use" product would reduce the fee by nearly $60,000.

Incomplete Measures Leave Impacts Unreported

The EPA's CRRP Program does not have complete measures to determine the impacts of the entire CRRP effort. The EPA's current performance measure does not completely capture the entire population of CRRP products, and is limited only to products with agricultural uses. The EPA measures its outcome as the "percentage of agricultural acres treated with reduced risk pesticides." As shown

in figure 3, usage of CRRP products increased from approximately 3 percent in 1998 to 22 percent in 2012.

Figure 3: Percentage of agricultural acres treated with reduced risk pesticides, 1998-2012



Source: OIG analysis of OPP data.

This measure calculates the percentage of agricultural acre treatments made using reduced risk pesticides based on data collected from the USDA. Analysis of the data is used to determine the overall level of CRRP product usage across more than 843 million acres that are regularly farmed in the United States.

OPP staff told us that this increase is the result of two specific chemicals on three crops. The first—glyphosate (Roundup®)—was used on genetically modified "Roundup-resistant" corn and soybeans and is responsible for roughly 75 percent of the annual agricultural acre treatments of reduced risk pesticides. The second—*Bacillus thuringiensis*—is a naturally occurring bacterium that is genetically spliced to corn and cotton seeds and makes up about 20 percent of the remaining reduced risk pesticides' annual agricultural acre treatments. All other agricultural-use CRRP products make up the remaining 5 percent of the measure above.

Although the agricultural pesticide application captures the majority of CRRP usage, there are also several CRRP products that are not registered for agricultural use. These CRRP products are mostly used in non-agricultural commercial applications, and some are used indoors or around food products. According to OPP staff, non-agricultural-product use is very difficult to collect because the applications are made by a diverse set of pesticide users to a wide range of use sites.

OPP staff mentioned that California requires reporting of commercial applications but the EPA does not currently collect this type of data. When we discussed this issue further, the PRIA Ombudsman indicated that it could be important to begin trying to capture this data for future measurements. Although the non-agricultural chemicals are only a small percentage of the overall effort, this could change in the future. Without measures that capture all agricultural and non-agricultural uses of CRRP pesticides, the EPA cannot accurately determine the outcomes and impacts of the CRRP Program's efforts.

Conclusions

The EPA is required by law to implement the CRRP Program, but over the last several years participation in the program has waned. Without a reduction in barriers, participation in the CRRP Program may continue to decline. Numerous obstacles impact the number of products that are registered under the program, and the agency does not currently have the authority to reduce these barriers. Further, the CRRP Program's measures do not report results from all likely impacts from the program. The EPA must address the participation barriers, as well develop and implement representative measures, to better capture the impacts of the CRRP Program.

Recommendations

We recommend that the Assistant Administrator for Chemical Safety and Pollution Prevention:

1. Reduce participation barriers for the CRRP Program by seeking statutory authority from Congress to reduce application fees for approved CRRP registrations.

2. Develop and implement measures for non-agricultural uses of CRRP products so that OPP's data are representative of the CRRP Program's entire effort.

Agency Comments and OIG Evaluation

The agency agreed with our findings and recommendations, and provided corrective actions and estimated completion dates that meet the intent of the recommendations. The agency's response to the first recommendation is contingent, in part, on a reauthorization of PRIA after the current legislation expires in September 2017. The agency's response to the second recommendation is contingent on the availability of information to support an appropriate measure of reduced-risk non-agricultural pesticide usage. At a meeting to discuss the agency's comments on the report, the agency was advised that the OIG will be monitoring the status of each corrective action after each estimated completion date. Based on this meeting and the agency's written response, we have

determined that the recommendations are resolved and open with corrective actions ongoing. No further response to this report is required. The agency's detailed response is in appendix A. The agency also provided technical comments on the draft report, which we have incorporated into our report as appropriate.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in $000s)	
Rec. No.	Page No.	Subject	Status[1]	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	7	Reduce participation barriers for the CRRP Program by seeking statutory authority from Congress to reduce application fees for approved CRRP registrations.	O	Assistant Administrator for Chemical Safety and Pollution Prevention	09/30/2017		
2	7	Develop and implement measures for non-agricultural uses of CRRP products so that OPP's data are representative of the CRRP Program's entire effort.	O	Assistant Administrator for Chemical Safety and Pollution Prevention	06/30/2015		

[1] O = recommendation is open with agreed-to corrective actions pending
C = recommendation is closed with all agreed-to actions completed
U = recommendation is unresolved with resolution efforts in progress

Agency Response to Draft Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 16, 2014

MEMORANDUM

SUBJECT: Comments on Draft Report "Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining" Project No. OPE-FY13-0003

FROM: James Jones, Assistant Administrator
Office of Chemical Safety and Pollution Prevention

TO: Carolyn Copper, Assistant Inspector General
Office of Program Evaluation

This memorandum is in response to the Office of Inspector General's (OIG) April 29, 2014, Draft Report, entitled Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining (Project No. OPE-FY13-0003) which evaluated the Agency's Conventional Reduced Risk Pesticide Program (CRRP). The Office of Chemical Safety and Pollution Prevention (OCSPP) appreciates the OIG's efforts to review the CRRP and the OIG's interest in improving this program. The Agency agrees with the OIG that some improvements can be made to the program, yet we would like to offer information to better characterize this program. We support both of the recommendations made by the OIG and have provided corrective actions with timeframes. We have also attached a track changes version of the draft report with edits that clarify goals and details of the CRRP.

I. Background

EPA believes it is critical to view the CRRP in the context of EPA's overall pesticide registration program and the requirements of the Pesticide Registration Improvement Act (PRIA), as amended. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requires that, before selling or distributing a pesticide in the United States, a person or company must obtain a registration, or license, from EPA, unless the product is exempt from pesticide registration. Before registering a new pesticide or new use for a registered pesticide, EPA must first ensure that the pesticide, when used according to label directions, can be used without posing unreasonable risks to human health or the environment.

In 2004, at the behest of a coalition of industry trade associations and environmental advocacy groups (the PRIA Coalition), Congress enacted PRIA and amended FIFRA to add required fees and specific decision timeframes for the review of 90 covered pesticide application categories. (Prior to PRIA, FIFRA did not require EPA to make decisions on most types of applications for registration within specific deadlines.) PRIA was subsequently amended two more times (2007 and 2012), with changes adding covered pesticide application categories - there are now 189 covered categories -as well as fee and timeframe changes. Under PRIA significantly greater predictability was achieved regarding when a regulatory decision would be made for both reduced risk and non-reduced risk covered applications. PRIA has also resulted in a smaller differential in the decision time frames between reduced risk and non-reduced risk applications than what existed prior to PRIA. The additional resources provided by PRIA fees were used, in part, to reduce by about 6 months (from 24 months (before PRIA) to 18 months) the average amount of time to make regulatory decisions on applications to register products containing new reduced risk active ingredients (AIs). While the PRIA fees for new AI and new use applications, whether reduced risk or not, are the same, the decision timeframes under PRIA for new, reduced risk AI and new uses applications are shorter compared to non-reduced risk applications - six months for new AIs and five months for new uses.

EPA's CRRP is a voluntary program that offers faster review times for reduced risk pesticides. The goal of CRRP is to register commercially viable alternatives to riskier conventional pesticides such as neurotoxins, carcinogens, and developmental and reproductive toxicants. The CRRP expedites the review and regulatory decision-making process for conventional pesticides that pose less risk to human health and the environment than existing conventional alternatives. This program does not apply to biological or antimicrobial pesticides, which are handled through separate expediting processes. In order to qualify for CRRP status, the applicant must provide a "reduced risk rationale" that compares risk endpoints for the chemical in question to those for registered pesticides currently being used on the crop(s) for which CRRP status is being sought. The reduced risk standard is a comparative standard, so once a reduced risk pesticide has been registered for a crop, the next reduced risk application for that crop is compared to it. The reduced risk standard is not static over time but becomes more difficult to achieve as more reduced risk pesticides are registered. Even without PRIA, one would expect a diminishing number of reduced risk pesticides as the standard becomes increasingly more difficult to meet.

EPA's CRRP is a voluntary program that offers faster review times for reduced risk pesticides. The goal of CRRP is to register commercially viable alternatives to riskier conventional pesticides such as neurotoxins, carcinogens, and developmental and reproductive toxicants. The CRRP expedites the review and regulatory decision-making process for conventional pesticides that pose less risk to human health and the environment than existing conventional alternatives. This program does not apply to biological or antimicrobial pesticides, which are handled through separate expediting processes. In order to qualify for CRRP status, the applicant must provide a "reduced risk rationale" that compares risk endpoints for the chemical in question to those for registered pesticides currently being used on the crop(s) for which CRRP status is being sought. The reduced risk standard is a comparative standard, so once a reduced risk pesticide has been registered for a crop, the next reduced risk application for that crop is compared to it. The reduced risk

standard is not static over time but becomes more difficult to achieve as more reduced risk pesticides are registered. Even without PRIA, one would expect a diminishing number of reduced risk pesticides as the standard becomes increasingly more difficult to meet.

II. OCSPP Responses to OIG's Recommendations

As required by EPA Order 2750, "EPA's Audit Management Process," we are addressing the OIG's recommendations as follows:

OIG recommended that the Assistant Administrator for Chemical Safety and Pollution Prevention take the following actions:

1. Reduce participation barriers for the CRRP Program by seeking statutory authority from Congress to reduce application fees for approved CRRP registrations.

OCSPP Response: OCSPP Response: While OCSPP is constrained from seeking such statutory change from Congress directly, we maintain a positive relationship with the PRIA Coalition and can discuss this with the Coalition. In addition, if the Coalition were to seek another renewal of PRIA when the law expires in 201 7, EPA will transmit this recommended change to the fees charged to applicants for reduced risk products to the Coalition. Transmittal of this recommendation will occur within 30 days from when the Coalition approaches EPA regarding PRIA renewal.

2. Develop and implement measures for non-agricultural uses of CRRP products so that OPP's data are representative of the CRRP Program's entire effort.

OCSPP Response: OCSPP believes it is valuable to pursue this recommendation, even though the non-agricultural pesticide usage data available to create a measure similar to the current agricultural CRRP products measure has significant limitations. We note that there are very few non-agricultural CRRP products, and OCSPP does not have data representative of the national non-agricultural uses. The available data is limited in its scope and coverage of non-agricultural markets in the following ways: not every non-agricultural market is captured in the data, the data collected is not consistent from market to market, and the data is not collected every year. Thus, in the past, we have not used the data to develop a national non-agricultural CRRP usage performance measure. However, within one year, OCSPP will explore the use of the available data to determine the possibility of creating a standardized measure for non-agricultural uses.

Attachment: Technical Corrections to DRAFT OIG Report

Appendix B

Distribution

Office of the Administrator
Assistant Administrator for Chemical Safety and Pollution Prevention
Agency Follow-Up Official (the CFO)
Agency Follow-Up Coordinator
General Counsel
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for External Affairs and Environmental Education
Deputy Assistant Administrator for Chemical Safety and Pollution Prevention
Director, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention
Audit Follow-Up Coordinator, Office of Chemical Safety and Pollution Prevention
Audit Follow-Up Coordinator, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention