

## DOCUMENT RESUME

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Need To Notify Foreign Nations of U.S. Pesticide Suspension and Cancellation Actions. CED-78-103; B-133192. April 20, 1978. 4 pp.

Report to Douglas M. Costle, Administrator, Environmental Protection Agency; by Henry Eschwege, Director, Community and Economic Development Div.

Issue Area: Environmental Protection Programs: Harmful Pesticides and Toxic Substances (2211).

Contact: Community and Economic Development Div.

Budget Function: Natural Resources, Environment, and Energy: Pollution Control and Abatement (304).

Organization Concerned: Department of State.

Congressional Relevance: House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry.

Authority: Federal Insecticide, Fungicide, and Rodenticide Act.

The Environmental Protection Agency's (EPA's) compliance with section 17(b) of the Federal Insecticide, Fungicide, and Rodenticide Act which requires EPA to notify foreign governments and international agencies whenever registration, cancellation, or suspension of a pesticide becomes effective or ceases to be effective was examined. Since 1972 when the act was amended to require foreign government notifications, EPA has cancelled, suspended, or significantly restricted use of 14 pesticides or pesticide ingredients. EPA and Department of State records indicate that foreign governments were notified concerning five pesticide actions. However, cognizant foreign officials indicated that few had actually received the notifications. EPA's criteria for reporting suspension and cancellation actions limit foreign government notifications to actions determined to have national or international significance. Only EPA-initiated cancellations and suspensions of basic pesticide active ingredients registered for use in several products are considered actions of national or international significance; actions on individual pesticide products are not. Foreign countries have received little, if any, information through official channels regarding the regulatory status of pesticides. Those countries receiving information obtained it primarily through personal contacts. EPA should: review all pesticide suspensions and cancellations to identify those of national and international significance, compile information on these actions for distribution to appropriate foreign governments, and develop a system with the State Department for timely and efficient dissemination of this information. (RRS)



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC  
DEVELOPMENT DIVISION

April 20, 1978

B-133192

The Honorable Douglas M. Costle  
Administrator, Environmental  
Protection Agency

Dear Mr. Costle:

In our ongoing review of Federal programs for regulating pesticide imports and exports, we examined EPA's compliance with Section 17(b) of the Federal Insecticide, Fungicide, and Rodenticide Act which requires EPA to notify foreign governments and appropriate international agencies "whenever a registration, or a cancellation or suspension of the registration of a pesticide becomes effective, or ceases to be effective." Appropriate notifications should be forwarded to the Department of State for transmittal to foreign nations. During the review, we noted deficiencies which we believe warrant your immediate attention.

Notification of United States suspension and cancellation actions are beneficial to both the United States and foreign nations. The latter benefit because they are alerted to some pesticides' unreasonable hazards and often follow the U.S. lead, which lessens exposure of their workers and citizens. The U.S. benefits when a nation restricts using these pesticides on U.S. food and fiber imports.

We reviewed EPA's and the Department of State's policies, practices, and pertinent legislation as well as documents, reports, and records on foreign country notifications of EPA's pesticide suspensions and cancellations. Regarding the adequacy of EPA notification actions, we also interviewed responsible officials of EPA, the Department of State, and the following countries: Costa Rica, West Germany, Guatemala, Indonesia, Mexico, New Zealand, the Philippines, Sri Lanka, Surinam, and Thailand.

CED-78-103  
(08700)

Since 1972, when the act was amended to require foreign nation notifications, EPA has canceled, suspended, or significantly restricted using 14 pesticides (or pesticide product ingredients). EPA and Department of State records indicate that EPA requested State to notify foreign nations about five pesticide regulatory actions taken. In each of these cases, State notified U.S. Embassies; agricultural and scientific attaches or other Embassy personnel were responsible for assuring that foreign government officials received notification. However, in talking with cognizant foreign officials, we found that few had actually received the notifications. It appears that notifications were not distributed to cognizant officials because neither EPA nor State had procedures for assuring that notifications reach their proper destination.

EPA did not request State to notify foreign nations about the following nine pesticides because it believed it was not necessary.

<u>Pesticide</u>	<u>Year of EPA regulatory action</u>
quaternary ammonium compounds	1973
chlordane	1976
heptachlor	1976
kepone	1976
OMPA	1976
strobane	1976
aramite	1977
chloranil	1977
safrole	1977

EPA's criteria for reporting suspension and cancellation actions limit foreign government notifications to those actions " \* \* \* determined to have national or international significance." EPA officials said that only EPA initiated cancellations and suspensions of basic pesticide active ingredients registered for use in several products are considered actions of national or international significance; actions on individual pesticide products are not. EPA officials stated that EPA decided notification on the substances listed above were not required either because registrants initiated the cancellations or because all product uses were not canceled.

However, we believe these actions have both national and international implications, and notifications should have been made. For example, registrations of chlordane and heptachlor were suspended, and strobane was canceled for most uses because of their suspected potential for causing tumors in animals. Chlordane and heptachlor were two of the most widely used pesticides in the world. The strobane action canceled 34 product registrations.

EPA, or its predecessor, had also canceled six other pesticides prior to the act's 1972 amendment. The pesticides were bithionol, endrin, lindane, polychlorinated biphenyls, polychlorinated terphenyls, and thallium sulfate. Although the amendment did not require notification of these cancellations, such information is of great interest to nations which do not have resources to extensively evaluate pesticides before use.

In talking with cognizant foreign officials, we found their countries have received very little, if any, information through official channels regarding the U.S. regulatory status of pesticides. Those countries that had information obtained it largely through personal contacts in the United States and from industry publications. Most wanted to receive regular and timely EPA data. Representatives from less developed nations were particularly anxious to receive such timely data because they did not have funds or qualified people to perform hazard evaluations equivalent to EPA's; therefore, they rely heavily on U.S. registration as a guide for allowing use in their country. These officials were particularly interested in the EPA booklet "Suspended and Cancelled Pesticides," which summarizes EPA actions on pesticide suspensions, cancellations, and other restrictions. During the review, several copies were distributed to interested foreign officials. This type of information is sufficient to alert countries using affected pesticides to initiate actions or request additional data as a basis for making their own risk-benefit analyses concerning continued use.

Based on the foregoing, EPA and State could improve their joint implementation of the pesticide law's notification provision. Therefore, we recommend that EPA:

- Review all pesticide suspensions and cancellations--  
both Agency- and registrant-initiated--to identify  
those of "national and international" significance.

--Compile information on these actions in a concise publication for distribution to appropriate foreign nations.

--Develop an appropriate system with State for timely and efficient dissemination of this and similar data to foreign officials.

Regarding the last recommendation, it may be most effectively implemented if EPA can provide direct notifications to appropriate foreign officials.

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As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

Copies of this report are being sent to the Department of State; the Director, Office of Management and Budget; and cognizant House and Senate committees.

Our overall review of pesticide imports and exports is continuing. We appreciate the courtesies and cooperation extended to our representatives, and we will continue to keep you informed of our progress.

Sincerely yours,



Henry Eschwege  
Director