



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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CEB 0-206

[EPA Procedures in Suspending Uses of Pesticides]

MAR 31 1980

B-198288

The Honorable William C. Wampler
Ranking Minority Member
Committee on Agriculture
House of Representatives

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Dear Mr. Wampler:

This is to confirm the agreements reached at a March 24, 1980, meeting attended by you, Thomas Adams and John Hogan of the House Agriculture Committee staff, and representatives of our Community and Economic Development Division. The meeting was held to discuss your March 11, 1980, letter requesting that we review the appropriateness of the procedures followed by the Environmental Protection Agency (EPA) in suspending most uses of the pesticides 2, 4, 5-T and silvex and initiating cancellation procedures on all uses of these pesticides. At the meeting, we agreed to immediately start reviewing the three areas discussed on page 2 of your March 11, 1980, letter. Briefly they are:

1. Identify and evaluate methods and procedures established by EPA to properly evaluate scientific evidence relied on by EPA to suspend and initiate cancellation procedures on a pesticide.
2. Determine whether EPA followed these established methods and procedures in the case of 2, 4, 5-T and silvex.
3. Identify prior GAO or National Academy of Sciences recommendations on pesticide regulatory issues which, if implemented by EPA, might have avoided questions of the appropriateness of EPA's emergency suspension and cancellation actions on 2, 4, 5-T and silvex.

In performing our review, we also agreed to carefully consider whether the Congress needs to amend the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 U.S.C. 136 et seq.), as amended to assure that EPA uses fair and equitable procedures when deciding whether to suspend or cancel a pesticide. Finally, we

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agreed to orally present our preliminary findings to you by the end of April 1980 and, if requested, to testify on these findings before the House Agriculture Committee in early May 1980, as part of the Committee's fiscal year 1980 and 1981 reauthorization hearings on FIFRA.

As you recognize, the timeframe for completing the above tasks is very short and I am concerned that we may be unable to provide definitive answers in time for the FIFRA hearings. Therefore, options for additional work that may be needed and for reporting the results of our review will be further discussed with you and your staff upon completion of this initial effort.

Sincerely yours,

(Signed) ELMER P. STAATS

Comptroller General
of the United States

bcc: Mr. Wessinger (CED)
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