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Federal Reregistration of Pesticides and Reassessment of Tolerances Will Extend Into the 21st Century

Statement of
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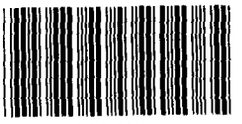
Before the
Subcommittee on Health and the Environment
Committee on Energy and Commerce
House of Representatives



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GAO/T-RCED-87-27

Mr. Chairman and Members of the Subcommittee:

About 50,000 pesticide products are registered for use today. However, people and the environment continue to be exposed to many pesticides that have not been fully tested to determine their potential for causing adverse human health effects, such as cancer and birth defects, and damaging the environment. The uncertainty of pesticide risks is not a new problem, only a persistent one. We are pleased to be here today to discuss our report entitled, Pesticides: EPA's Formidable Task to Assess and Regulate Their Risks (GAO/RCED-86-125, Apr. 18, 1986).

Pesticides are a mixed blessing. They contribute significantly to agricultural productivity and improved public health, but they can also adversely affect people, wildlife, and the environment. Many pesticides remain as residues on food that persist to the dinner plate and are ingested along with the food. Pesticides are toxic substances, and some have exhibited evidence of causing chronic health effects, such as cancer and birth defects.

In 1972 the Congress required the Environmental Protection Agency (EPA) to reassess the risks of all registered pesticides, including chronic (long-term) as well as acute health risks, in accordance with current testing requirements and standards. EPA is to reregister a pesticide product, thereby allowing its use to continue, only if its risks are reasonable when compared to its benefits. Fifteen years later, EPA has yet to completely reassess the vast majority of the approximately 600 active ingredients used in the 50,000 registered products. On the basis of current resources and program projections, it appears that EPA's formidable task of reregistering pesticides and reassessing the safety of pesticide residues on food will extend well into the 21st century. Until EPA completely reassesses these pesticides, it cannot fully assure the public that they and the environment are adequately

protected against possible unreasonable risks from the use of pesticides.

Mr. Chairman, this morning I will discuss how EPA regulates pesticides, why the risks of most pesticides remain uncertain, the status of pesticide reregistration, the status of tolerance (maximum legal residue levels) reassessment, why reregistration and reassessment will extend well into the next century, and possible alternatives to accelerate reregistration and reassessment.

FEDERAL PESTICIDE REGULATION PROGRAM

Federal regulation of pesticides is governed by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Federal Food, Drug, and Cosmetic (FD&C) Act. Under FIFRA, a pesticide product must generally be registered by EPA before it may be marketed, if the benefits of its use(s) are judged to outweigh its risks. Registrations are basically licenses for specific uses of a pesticide product that state the terms, conditions, and cautions of these uses. EPA requires pesticide product registrants and applicants to submit health and environmental effects data to support product registrations. FIFRA also authorizes EPA to deny a new registration or amend, restrict, cancel, or suspend an existing registration if it finds that a pesticide product presents an unreasonable risk to human health or the environment. EPA currently has registered about 50,000 pesticide products, formulated from one or more of about 600 active and about 1,200 inert ingredients.[1] Hereinafter I will refer to active ingredients as pesticides. Annual usage of pesticide products is about 3.5 billion pounds.

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[1]An active ingredient is that component in a pesticide product that is intended to specifically control or destroy a pest. An inert ingredient is not intended to control or destroy a pest, but rather is used to dissolve, dilute, propel, or stabilize the active ingredient in the pesticide product.

Under the FD&C Act, EPA must either establish a tolerance or grant a tolerance exemption[2] for each registered use of a pesticide on a food crop or edible animal product. A tolerance is the maximum legal limit of pesticide residue allowed to remain in or on raw agricultural commodities, processed foods, or animal feed. It also represents an amount that is considered to impose no health hazard within a practical certainty over a lifetime of daily exposure. About 400 pesticides are registered for food uses, with about 6,000 tolerances for residues of these pesticides on numerous crops and processed foods. Existing tolerances for 390 of these pesticides were established without all the data EPA now requires to assess health risks of food use pesticides according to current scientific standards. A tolerance or a tolerance exemption is a prerequisite to registration of a food-use pesticide. Most of the data needed to make a tolerance decision are also critical in deciding whether to register a pesticide product.

RISKS OF MOST PESTICIDES REMAIN UNCERTAIN

Mr. Chairman, every man, woman, and child in the United States is exposed to pesticide residues in the food they eat. In a recent comparative risk project, EPA concluded that pesticide residues in food ranks among the top contributors to human health risks that it must regulate. However, the risks of most pesticides, which much of the population is exposed to daily, are uncertain.

As we have reported since 1975, most pesticides were registered and most tolerances were established with less data than are now required, resulting in the need to reassess these pesticides according to current data requirements and scientific

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[2]EPA may grant an exemption from the requirement of a tolerance when it determines that a tolerance is not necessary to protect the public health. For example, EPA has exempted some naturally occurring substances not considered toxic to humans.

standards.[3] Between 1947, when FIFRA was first enacted, and 1972, the concerns about the risks of pesticides expanded to include potential chronic health effects, adverse ecological effects, and the environmental fate of pesticides. However, new data requirements dealing with these concerns were applied primarily to new pesticides or new uses--there was no systematic process to impose requirements retroactively on previously registered pesticides. In addition, even for pesticides that had been tested, EPA has determined that certain studies were conducted using scientific standards that are no longer acceptable for decision making today, or were invalidly conducted and will need to be repeated or replaced.

History of Reregistration

As you know Mr. Chairman, reregistration of pesticides has had a somewhat difficult and troublesome past. The 1972 amendments to FIFRA required EPA to reregister all previously registered pesticides by October 21, 1976.[4] In 1975, the Congress extended the completion date to October 21, 1977, because of inadequate resources and delays in EPA's development of a reregistration program. In 1978, after EPA's early attempts to reregister pesticides were unsuccessful, the Congress reaffirmed the need for the expeditious reregistration of all pesticides, giving priority to food-use pesticides, but deleted the deadline requirement. The Congress also sanctioned a chemical-by-chemical approach rather

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[3]See attachment IV for a list of previous GAO reports dealing with pesticide residues in food.

[4]Reregistration is the process of bringing the registrations of about 50,000 pesticide products into compliance with current data requirements and scientific standards. To accomplish this task, EPA must gather and review health and environmental studies and reregister pesticide products if the benefits of their use(s) outweigh the risks. Previously registered pesticide products may remain on the market pending EPA's reregistration, if registrants take appropriate steps to develop any new data that EPA requires.

than a product-by-product approach to registration and reregistration; that is, EPA may make broad regulatory decisions at one time for all pesticide products containing the same active ingredient. Although FIFRA does not specifically require EPA to reassess tolerances, EPA decided in 1977 to reassess tolerances for food-use pesticides through its reregistration program. Tolerance reassessment is a key component of food-use pesticide reregistrations.

EPA has been pursuing a long-term strategy to gather and evaluate the data necessary for reregistering pesticides and reassessing tolerances. This strategy involves three related programs:

-- The Data Call-In Program, begun in 1981, assists in collecting missing information on chronic health effects and certain other studies, which may take up to 4 years to complete. Under this program, EPA identifies selected studies, such as cancer studies, that are missing on individual pesticide active ingredients, and requires registrants to provide these data.

-- The Registration Standards Program, begun in 1978, is EPA's major effort to systematically develop comprehensive regulatory positions for each of the 600 active ingredients.

-- The special review process, begun in 1975, is a detailed, informal review process to re-evaluate existing pesticide registrations when new evidence raises a concern about a significant health or environmental risk.

Since 1983 EPA has generally been reviewing pesticides by clusters of similar use active ingredients ranked according to production volume, potential human exposure, and potential

ecological exposure. As required by law, EPA has given priority to food-use pesticides.

PESTICIDE REREGISTRATION AND TOLERANCE REASSESSMENT WILL EXTEND INTO THE 21ST CENTURY

Despite EPA's recent progress, reregistering pesticides and reassessing tolerances is a formidable task that will extend well into the next century. In the meantime, pesticides can continue to be marketed, and people will continue to be exposed to them in their food without full knowledge of the pesticides' effects on human health and the environment.

Status of Pesticide Reregistration

EPA is beginning to make progress in its efforts to reregister pesticides. However, its progress to date demonstrates that there are still significant data gaps on pesticides, and a large amount of work yet to be done. Specifically, we found:

-- At the time we issued our report, EPA had not completely reassessed any pesticide. However, EPA had completed 124 "interim registration standards."[5] (An interim registration standard describes what EPA knows about a particular pesticide at a point in time, identifies data that are missing or invalid, and addresses those regulatory and scientific issues for which sufficient data exist.)

Although EPA generally referred to them as registration standards, the 124 standards developed on pesticides through March 1986 were interim, not final, standards

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[5]Between March 31, 1986, and May 28, 1987, EPA had completed 2 final registration standards and 31 additional interim registration standards. See attachment I.

because about one-third to one-half of the data needed for reassessment was nonexistent or inadequate at the time EPA prepared the standards.

-- While EPA has accelerated its collection of chronic health effects and other special data needed for reassessment through its Data Call-In program, its efforts are incomplete because it does not evaluate the adequacy of existing studies under this program. An unknown number of existing studies will need to be replaced or repeated following interim registration standard review because EPA may determine that they are invalid or inadequate, as has already happened in some instances. Between 1981 and 1985, EPA processed all 390 food-use pesticides through the Data Call-In program and notified registrants to submit about 1,400 chronic effects studies. Since the longest of these studies takes 4 years to complete, EPA anticipates that it will have received all of these required studies by 1990.

EPA is considering alternative methods for obtaining data on the roughly 210 non-food-use pesticides, depending on the results of two pilot studies. Under these studies, EPA is examining registrants' ability to apply current data requirements to their products and provide any missing data to EPA. However, neither of these pilot studies involves registrants' review and evaluation of existing studies.

-- Interim registration standards have resulted in some changes to product registrations. EPA's review of available data on about 60 percent of the interim registration standards identified health and environmental concerns that necessitated additional restrictions, mostly labeling changes. More importantly, since 1984 EPA has initiated special reviews of 10 pesticides because of

actual or potential risks identified through an examination of data during reregistration efforts.

-- EPA plans to prepare final registration standards, referred to as Final Regulatory Standards and Tolerance Reassessments, after it receives and reviews all required data on an active ingredient. EPA estimates that it may not complete final standards until about 2024. Although final standards are key to the reassessment of pesticides and tolerances, they do not complete the process of reregistering individual products. Following development of final standards, EPA will have to apply decisions reached on active ingredients to individual products containing these active ingredients, including those containing more than one active ingredient, and take appropriate regulatory action, such as reregistering products, changing tolerances, imposing restrictions, and suspending and cancelling registrations or uses, if necessary. About half of all pesticide products contain more than one active ingredient. In evaluating the long-term health and environmental effects of pesticide products containing multiple active ingredients, EPA plans to review the active ingredients separately and then regulate the products on the basis of the combined regulatory positions developed on the active ingredients. EPA decided to generally assess the long-term effects of single active ingredients and not the effects of combining two or more ingredients (i.e., synergistic effects of combining two or more active or inert ingredients) because of scientific and economic limitations. However, EPA requires certain testing, particularly studies of acute effects, on the formulated product.

In addition, we believe EPA will have to update and revise final standards on a continuing basis because of the

dynamic nature of pesticide regulation and the need to avoid another costly and lengthy effort to periodically reassess pesticides to bring them into compliance with evolving requirements, science, and uses.

-- EPA has only recently begun to address the issue of human health and environmental risks and uncertainties from inert ingredients. In April 1987, EPA issued its policy statement on inert ingredients in pesticide products, which outlined EPA's strategy for dealing with inerts of toxicological concern. EPA has divided the approximately 1,200 inert ingredients used in existing pesticide products into four toxicity categories on the basis of available information: inerts of toxicological concern (57); potentially toxic inerts and inerts with high priority for testing (67); unknown toxicology concern (800); and innocuous substances (300).

EPA is encouraging registrants to use the least toxic inert ingredient available. According to its policy statement, EPA will (1) require data and labeling for inert ingredients that have been demonstrated to cause toxic effects; (2) pursue hearings for the 15 inerts of the greatest toxicological concern to determine whether such ingredients should continue to be permitted; (3) require data on inerts of suspected toxicological concern; and (4) subject all new inert ingredients, both for food and non-food uses, to minimal data requirements and scientific reviews. EPA is not taking any particular regulatory action with respect to inert ingredients of unknown toxicological concern at this time.

-- In 1986, EPA was just beginning to deal with the administrative and legal issues involved in monitoring and enforcing interim registration standard requirements (i.e.,

data and labeling requirements). Although registrant compliance is a critical phase in successfully completing reregistration, EPA had not routinely followed up on registrants' compliance with interim registration standards. Consequently, about 50 percent of registrants' responses to interim registration standard requirements were overdue. Further, EPA had not issued any cancellation notices to enforce interim registration standards because, according to EPA officials, the cancellation process provided under FIFRA is time-consuming and labor-intensive. Despite EPA's efforts in 1987 to follow up on interim registration standards, registrant responses to interim standard requirements, including product labeling changes, remain at about 50 percent overdue. Label requirements are the primary mechanism by which EPA regulates the use and misuse of pesticides and updates product labels to reduce risks to human health and the environment.

Status of Tolerance Reassessment

Limiting the amount of pesticide residues in food is often critical for protecting the public from immediate and long-term health effects. EPA has begun to obtain needed data and has established procedures for reassessing tolerances. However, EPA has reassessed only a few tolerances according to current scientific standards, and it will be many years before EPA will complete tolerance reassessments. Specifically, we found:

-- Many existing tolerances and exemptions were established without all the data EPA now requires to assess the health risks of food-use pesticides. As part of its efforts to reregister about 390 pesticides registered for use on food, EPA plans to reassess their tolerances and exemptions to determine whether they were set at levels that do not present a health hazard.

To reassess tolerances EPA uses pesticide registrants' data concerning pesticide toxicity and residues. Most of the data used in making a tolerance decision are also considered in deciding whether to register or reregister a pesticide product with a food or feed crop use.

-- Of the 92 interim registration standards for food-use pesticides that we reviewed,[6] EPA was unable to completely reassess the tolerances in 84 food-use standards because required chronic toxicity and/or residue data were missing or inadequate. We identified eight food-use pesticides where EPA had sufficient data to reassess tolerances.

In addition to its efforts to reassess pesticide tolerances, EPA continues to address scientific questions concerning how it calculates the safety of tolerance levels.

Why Reregistration Will Extend Into the 21st Century

EPA's efforts to reregister pesticides and reassess tolerances will extend well into the 21st century because of the magnitude and complexity of the tasks involved, EPA's current lengthy, labor-intensive process, EPA's limited resources, and the ability and willingness of industry to cooperate with EPA. Reregistration will take a long time to complete for many reasons:

-- The volume of pesticides and tolerances to be reviewed is large--about 50,000 pesticide products (formulated from

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[6]EPA reported completing 117 interim registration standards as of Sept. 30, 1985, at least 95 of which were for food-use pesticides, but only 92 interim standards were available at the time of our review (Sept. 1984 to Oct. 1985). For example, one interim standard was unavailable because the manufacturer had voluntarily withdrawn the pesticide's registration.

about 600 active ingredients) and 6,000 tolerances. EPA expects registrants will withdraw about 35 percent of previously registered pesticide active ingredients from the market, leaving a still sizeable number of reregistration and tolerance reassessment actions to complete. Registrants may decide to withdraw pesticide product registrations because they no longer produce the pesticide or may decide not to pursue reregistration of their products for market or other reasons.

The volume of data to be reviewed and the amount of time needed to complete new studies are significant. As many as 150 different studies, which take from a few months to 4 years to complete, may be required to support registrations and tolerances of a pesticide used on a food crop.

Aside from the sheer volume of data to be reviewed, EPA will have to make complex and difficult scientific assessments and regulatory decisions on the new data it receives and reviews.

-- EPA's current reregistration and reassessment process is lengthy and labor-intensive, in part because EPA assumes the burden of evaluating existing studies and identifying data gaps on individual pesticides. As attachment II illustrates, the current process consists of EPA's efforts to determine the acceptability of each piece of existing data, identify data gaps, and make interim scientific and regulatory decisions on the basis of available data; track and enforce registrants' compliance with data and interim registration standard requirements; review data and establish final standards and tolerance reassessments; track and enforce registrants' compliance with these requirements; ultimately reregister individual pesticide products; amend, cancel, or suspend registrations as

needed; and promulgate regulations to establish, amend, or revoke tolerances as needed.

According to EPA officials, the single largest expenditure in the current reregistration process is EPA's scientific review of existing data. This task involves evaluating the adequacy of existing data, identifying data gaps, identifying data used to support the registration for data compensation purposes, and documenting data reviews in a standard format.

-- EPA's resource limitations constrain, to some extent, the pace of reregistration and tolerance reassessment. Although EPA separately budgets registration and reregistration activities, competing demands for limited resources available to EPA influence the programs' accomplishments. As attachment III indicates, while EPA's staff level with respect to reregistration has increased, the resources available to the Office of Pesticide Program are less than at their peak in 1980. Even with a recent emphasis on reregistration, EPA plans to produce only about 20 interim registration standards and 5 final standards each year. Further, EPA has determined that, because of resource constraints, it will be unable to review immediately upon receipt the increasing volume of new studies it expects to receive.

The current reregistration process is costly. In 1986, interim registration standards, on average, took about 18 months to complete and cost about 5 EPA staff years and an additional $100,000 in extramural funds (i.e., contracts and cooperative agreements) to develop. EPA officials anticipate that final standards may cost, in both time and resources, about as much as interim standards. In addition, following up on interim and final registration

standards is costly. (The time and costs for completing reregistration and tolerance reassessment efforts varies by pesticide, the number of studies to be reviewed, the complexity of scientific and regulatory issues, and other factors.)

The pace of reregistration is also influenced by other factors, including the necessary diversion of management attention and resources to conduct special reviews of pesticides of concern as EPA receives new evidence about a significant human health or environmental risk on existing pesticide registrations. According to EPA officials, about 25 percent of pesticide active ingredients undergoing reregistration will undergo special reviews because of risk concerns.

In addition, EPA's reregistration and tolerance reassessment efforts are further complicated by such emerging issues as 1) the need to deal with actual and potential pesticide contamination of groundwater and 2) the apparent legal inconsistencies that prohibit, under some circumstances, the use of a cancer-causing pesticide while, under other circumstances, allow the use of the same pesticide.

-- The ability and willingness of the pesticide industry and other members of the regulatory community to cooperate with EPA are likely to influence EPA's reregistration efforts. For example, registrants' compliance with interim and final registration standards is critical to the timely generation of needed data and reduction in risks to people and the environment.

In short, EPA faces a formidable task in reassessing the risks of pesticide products registered and tolerances established over

the past four decades. The task has proven to be much more extensive, complex, costly, and time-consuming than first envisioned.

ALTERNATIVES FOR ACCELERATING REREGISTRATION ARE LIMITED

While Members of the Congress, the pesticide industry, environmental and consumer groups, and others agree that reregistration of pesticides and reassessment of tolerances need to be accelerated, there appear to be few alternatives available for significantly accelerating this time-consuming and resource-intensive effort. We suggested three possible approaches for the Congress to consider to accelerate reregistration.[7] Each of the approaches has advantages and disadvantages and could be adopted alone or in combination. We did not analyze the costs and other implications, such as effects on risk levels, of the alternatives. We discussed the approaches to show that there is no simple way to significantly accelerate reregistration.

The approaches discussed in our report included

-- amending FIFRA to shift some of the regulatory burden to industry by requiring industry, rather than EPA, to identify data gaps and assess the adequacy of existing data prior to EPA's reregistration of a pesticide and reassessment of a tolerance,

-- amending FIFRA to establish reasonable deadlines for pesticide firms to complete test data and for EPA to review the data and make regulatory decisions, and

-- providing EPA with additional resources to expedite the pace of reregistering pesticides and reviewing the volume

[7]See GAO/RCED-86-125, Apr. 18, 1986, pp. 47-53.

of data submitted by industry, possibly by assessing user fees on pesticide firms.

In addition, we recommended that the Administrator, EPA, conduct a pilot test to determine whether registrants can successfully review existing data to identify and replace inadequate or invalid studies and to assess its ability to successfully oversee registrant data submissions. We further recommended that the Administrator consider the results of this pilot study in determining whether and how to accelerate reregistration by further shifting the burden to industry to fill data gaps for existing pesticides. EPA agreed with our recommendations and is in the process of implementing them.

More recently, EPA has drafted a plan to accelerate reregistration of existing pesticides that is patterned in part on legislation considered in the last Congress. While we have not analyzed the merits of this plan, it does incorporate our recommendation for a pilot test. The draft plan proposes to accelerate reregistration by 8 to 9 years over the current approach and accelerate identification of pesticides of concern for prompt regulatory action. Under the plan, EPA proposes to replace interim registration standards with a comprehensive request for all required data. EPA would conduct a preliminary identification of data requirements for all uses of each active ingredient; registrants would assess the adequacy of all existing data and provide the required data. EPA would audit selected registrants' responses and submittals to ensure compliance and receipt of quality submittals. EPA would immediately examine new studies when registrants identify--"flag"--data of concern. EPA will prepare final standards after receipt and review of all data. The draft plan calls for a pilot test of this approach on 20 to 50 pesticides before initiation of a full-scale data call-in. EPA has placed the draft plan in abeyance until questions on resource levels necessary to implement the plan are resolved.

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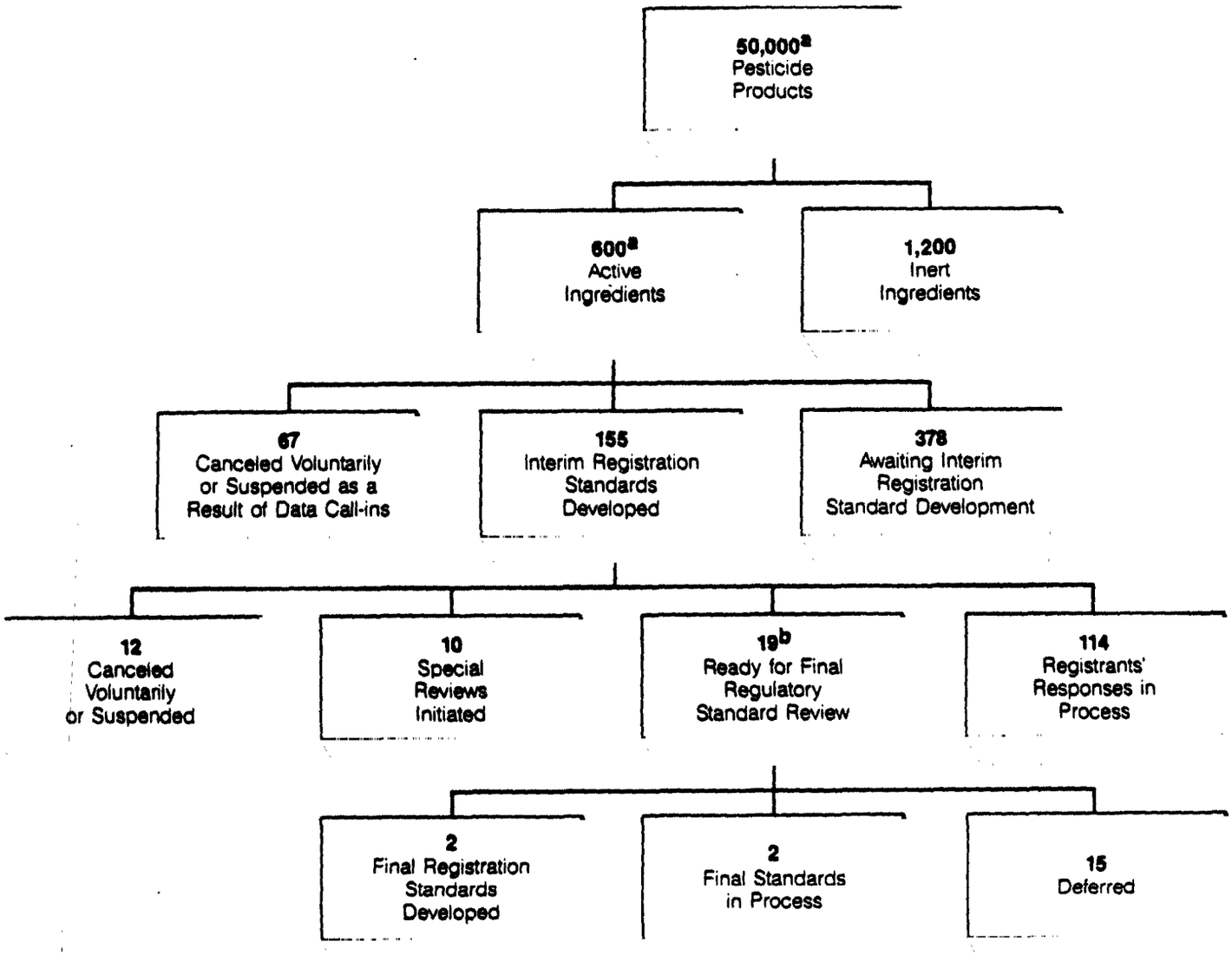
Mr. Chairman, in summary, we believe that within the last few years EPA has made progress toward reregistration, but its progress underscores the formidable task it faces in assessing and regulating the risks of pesticides. Assuming EPA is able to complete final registration standards sometime around 2024, the program will have been in operation about 50 years. In view of EPA's current pace of reassessing the risks of older pesticides and tolerances and the formidable task that lies ahead, the Congress may wish to consider alternative approaches to accelerate reregistration, including the three we suggested. In the interim, the general public and the environment will continue to be exposed to pesticides that have not been fully tested to determine their potential for causing cancer, birth defects, and environmental damage.

This concludes my prepared statement, and we would be pleased to respond to your questions.

Status of Pesticides Undergoing Reregistration as of May 28, 1987

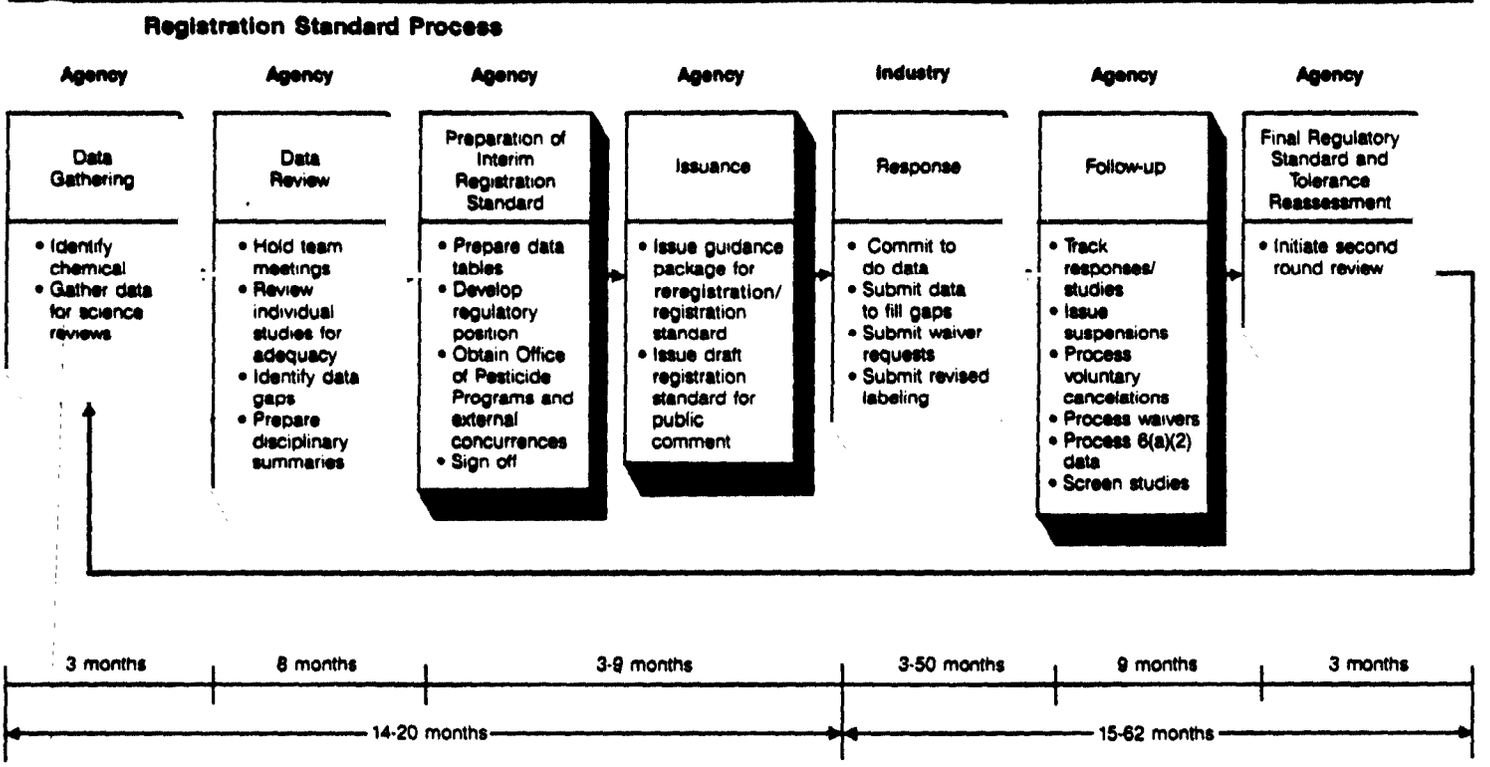


[a]Figures are approximate. EPA does not expect to review all older active ingredients or products because some are no longer produced or registrants may decide not to pursue reregistration.

[b]According to EPA, preparation of final standards has been deferred for 15 of these 19 active ingredients for which reassessment is essentially complete.

Source: Compiled from EPA information. We did not independently verify this information.

ATTACHMENT II

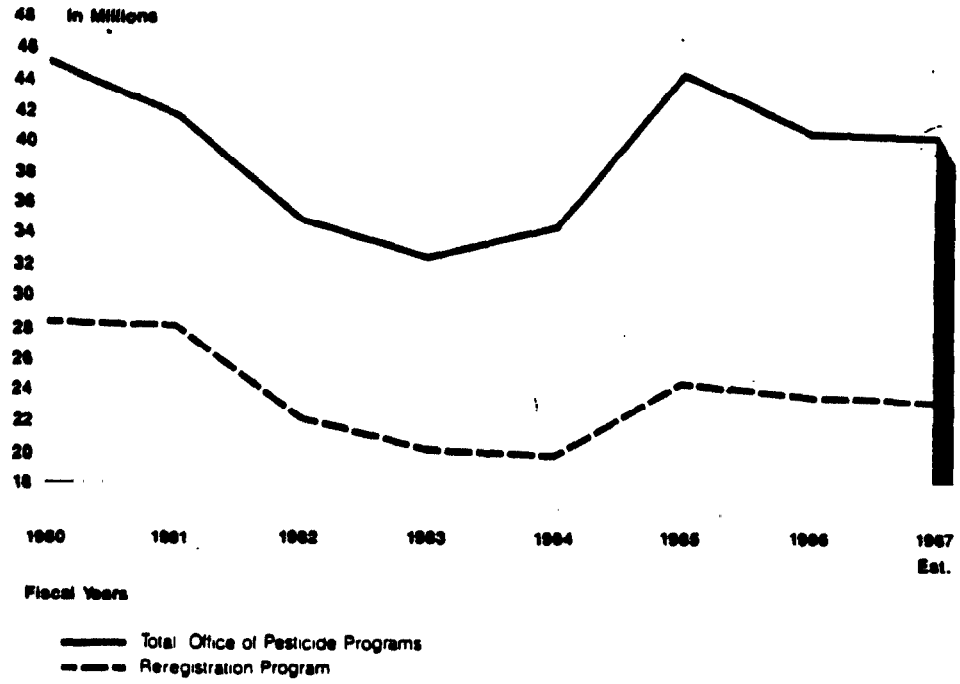


Time Line per Pesticide Active Ingredient

Source: EPA (March 1986, updated May 1987).

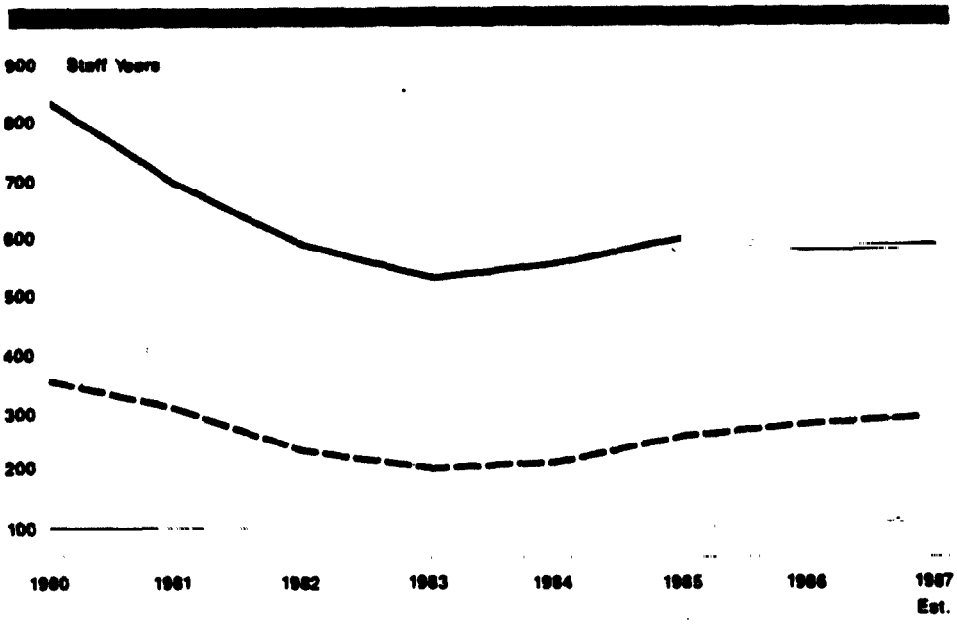
ATTACHMENT III

Office of Pesticide Programs
Budget History
Fiscal Years 1980 to 1987



Source EPA

Office of Pesticide Programs
Staff History
Fiscal Years 1980 to 1987



Source EPA

ATTACHMENT IV

GAO REPORTS
DEALING WITH PESTICIDE RESIDUES IN FOOD

GAO/RCED-87-7	October 27, 1986	Pesticides: Need to Enhance Ability to Protect the Public From Illegal Pesticides
GAO/RCED-86-219	September 26, 1986	Pesticides: Better Sampling and Enforcement Needed on Imported Food
GAO/HRD-86-102	September 30, 1986	Food and Drug Administration Laboratory Analysis of Produce Samples Needs to Be More Timely
GAO/RCED-86 -214FS	August 29, 1986	Pesticides: FDA's Investigation of Imported Apple Juice Concentrate
GAO/RCED-86-125	April 18, 1986	Pesticides: EPA's Formidable Task to Assess and Regulate Their Risk
GAO/HRD-86-2	February 18, 1986	Food Inspections: FDA Should Rely More on State Agencies
GAO/HRD-84-61	September 26, 1984	Legislative Changes and Administrative Improvements Should Be Considered for FDA to Better Protect the Public From Adulterated Food Products
GAO/RCED-83-153	September 9, 1983	Monitoring and Enforcing Food Safety--An Overview of Past Studies
GAO/HRD-82-3	December 11, 1981	Regulation of Cancer-Causing Food Additives--Time for a Change
CED-82-5	October 15, 1981	Stronger Enforcement Needed Against Misuse of Pesticides

ATTACHMENT IV

GAO REPORTS
DEALING WITH PESTICIDES IN FOOD

CED-81-152	September 10, 1981	Grain Fumigation: A Multifaceted Issue Needing Coordinated Attention
CED-80-32	February 15, 1980	Delays and Unresolved Issues Plague New Pesticide Protection Programs
CED-79-43	June 22, 1979	Better Regulation of Pesticide Exports and Pesticide Residues in Imported Foods Is Essential
GAO/HRD-79-10	April 17, 1979	Problems in Preventing the Marketing of Raw Meat and Poultry Containing Potentially Harmful Residues
HRD-77-72	July 5, 1977	Food and Drug Administration's Program for Regulating Imported Products Needs Improving
RED-76-42	December 4, 1975	Federal Pesticide Registration Program: Is it Protecting the Public and the Environment Adequately from Pesticide Hazards

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