



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

NOV 27 2017

MEMORANDUM

SUBJECT: Supplemental Response to the Office of Inspector General Draft Report: "EPA Can Better Reduce Risks from Illegal Pesticide Imports," dated June 27, 2017, Report No. OPE-FY16-0025

FROM: Lawrence Starfield
Acting Assistant Administrator

TO: Carolyn Cooper
Assistant Inspector General
Office of Program Evaluation

The Office of Enforcement and Compliance Assurance (OECA) and the Office of the Inspector General (OIG) met on October 31, 2017, and have reached agreement on corrective actions for Recommendations 1 and 2, denoted as "Not in Agreement" in OECA's July 27, 2017, response to the above-captioned draft report. Additionally, the corrective action for Recommendation 3 has been edited. The Report should be edited to reflect the following agreed-upon Corrective Actions:

No.	Recommendation	Agency Explanation/Response	Corrective Action
1	Strengthen internal controls by establishing national compliance monitoring goals based on assessment and consideration of available regional resources.	Assessment and consideration of available regional resources is already conducted and is represented by the Annual Commitment System (ACS).	By September 30, 2019, for import-related compliance monitoring activities (including but not limited to the review of Notices of Arrival), identify and implement national goals and strengthen internal controls, efficiently leveraging federal resources, and communicate progress of regional accomplishments.
2	Implement internal controls to monitor and communicate progress on regional goals.	Existing internal controls exist through the ACS development and tracking process, National Pesticide Meetings, annual FIFRA Enforcement Managers Meeting, internal monthly import calls, monthly pesticide calls with regional, OECA and OPP representatives, and EPA-requested import inspections conducted by state grantees.	

3	Develop agency guidance and training on how EPA regions can use the Automated Commercial Environment System for regional targeting of importers, manufacturers and pesticide products.	We can expand training efforts, working closely with the Office of Environmental Information (OEI) and the regions to implement the new ACE/ITDS system. Learning the system and how to use its new capabilities is considered critical for successful implementation of ACE/ITDS. OECA will continue this effort in group settings and one-on-one trainings.	Conduct at least two (2) new group training webinars and develop associated guidance and/or training materials by September 30, 2018.
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Contact Information

If you have any questions or concerns regarding this supplemental response, please contact the OECA Audit Liaison, Gwendolyn Spriggs, at (202) 564-2439.

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