




OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

May 8, 2024

MEMORANDUM

SUBJECT: Response to Planned Corrective Actions for Office of Inspector General
Report No. 22-E-0053 *The EPA Needs to Improve Transparency of Its Cancer-Assessment Process for Pesticides*, issued July 20, 2022

FROM: Sean W. O'Donnell, Inspector General 

TO: Michal Ilana Freedhoff, Ph.D.
Assistant Administrator Office of Chemical Safety and Pollution Prevention

Thank you for your February 17, 2024 update on the Office of Chemical Safety and Pollution Prevention's proposed actions to address unresolved Recommendation 8 for the subject Office of Inspector General report. All other recommendations were previously resolved. Based on the information provided, we disagree that the proposed corrective actions address Recommendation 8 and it remains unresolved.

Recommendation 8 called for the OCSPP to "Conduct an external peer review on the 1,3-dichloropropene cancer-risk assessment." Your response described a planned review by the EPA's Science Advisory Board. Your response noted, "While this proposed SAB review will not be a peer review of the 2019 cancer risk assessment that OCSPP conducted for 1,3-dichloropropene, OCSPP believes that this is an appropriate first step in addressing the scientific integrity concerns that were raised to both the Agency's Scientific Integrity Official as well as to the OIG. ... OCSPP intends to update its cancer risk assessment for 1,3-dichloropropene as part of the ongoing registration review for this pesticide active ingredient, as required under the Federal Insecticide, Fungicide, and Rodenticide Act." While we agree that this is a positive step, we continue to believe that the EPA needs to conduct an external peer review to best address the scientific integrity concerns described in our report. This recommendation remains unresolved until the EPA conducts an external peer review. We note that EPA Manual 2750 requires that recommendations be resolved promptly, and we look forward to future communication to reach resolution.

We will post this memorandum on our public website at www.epaoig.gov.

cc: Susan Perkins, Agency Follow-Up Coordinator
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