

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

**MEMORANDUM**

**SUBJECT:** Response to Final Report entitled “EPA Deviated from Typical Procedures in its 2018 Dicamba Pesticide Registration Decision.”

**FROM:** Michal Freedhoff, Ph.D.  
Assistant Administrator

**MICHAL FREEDHOFF** Digitally signed by MICHAL FREEDHOFF  
Date: 2021.07.16 11:16:42 -04'00'

**TO:** Sean O’Donnell  
Inspector General

This memorandum responds to the Final Report of the Office of Inspector General (OIG) entitled “EPA Deviated from Typical Procedures in its 2018 Dicamba Pesticide Registration Decision,” Report No. 21-E-0146, dated May 24, 2021.

The Office of Chemical Safety and Pollution Prevention (OCSPP) very much appreciates the opportunity to provide additional details to resolve Recommendation 2 in the Final Report. Below is our proposed updated corrective action and estimated completion date.

**I. OCSPP’s Amended Response to Recommendation 2:**

**Recommendation 2:** Require an assistant administrator-level verification statement that Scientific Integrity Policy requirements were reviewed and adhered to for pesticide registration decisions that involve the immediate office.

- **Proposed Corrective Action:** Building on the agreed upon Corrective Actions for Recommendation 1, whereby OCSPP is developing Standard Operating Procedures or formal Best Practices on ensuring scientific integrity in pesticide regulatory decisions, OCSPP agrees to implement through the Federal Managers’ Financial Integrity Act (FMFIA) process an Assistant Administrator-level verification that the Scientific Integrity Policy requirements were reviewed and adhered to for pesticide registration decisions that involve the immediate office.
- **Explanation:** This approach adds additional layers of transparency in that the annual FMFIA assurance letter—and the Assistant Administrator-level verification statement therein—goes to the Administrator and the OIG and includes a separate scientific integrity questionnaire/assessment for added checks and balances.
- **Target Completion Date:** September 30, 2022.

Again, OCSPP appreciates the OIG's efforts in evaluating the effectiveness of the Agency's policies and procedures in addressing stakeholder risks in the 2016 and 2018 dicamba pesticide registration decisions. OCSPP joins the Office of the Inspector General in affirming the importance of the Scientific Integrity Policy and its emphasis on communication, transparency, and respect for differing scientific opinions. OCSPP welcomes the OIG's efforts to strengthen scientific integrity in OCSPP.

cc: All OCSPP DAAs  
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Carol Ann Siciliano, OCSPP Deputy Scientific Integrity Official  
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