Using Evaluations to Improve Programs: A Case Study of EPA’s Product Reregistration Process

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Purpose of the External Review of the Product Reregistration Process

• Identify the causes of delay in the product reregistration process, and

• Identify opportunities for innovation & streamlining that would make the process more efficient;

• Ensure a more timely implementation of the required mitigation measures for pesticide use.
Background

- To ensure the safe use of older pesticides, the Federal Insecticide, Fungicide and Rodenticide Act’s (FIFRA) 1988 amendments required a comprehensive review of all pesticide active ingredients registered before November 1984;

- The science reviews, risk assessments and risk management decisions regarding the necessary mitigation for each active ingredient were issued in Reregistration Eligibility Decision documents (REDs); [600 active ingredients were subject to reregistration];

- Once the RED was completed, all products that contain that active ingredient must submit, among other things, amended product labels that implement the mitigation requirements in the RED; [universe of products subject to reregistration > 20,000];
Background – con’t

- Completion of REDs required by statute:
  - All food-use REDS required to be completed by August 3, 2006;
  - All non-food-use REDs required to be completed by October 3, 2008;

- No statutory deadline for completion of product reregistration;
Results

• During the external review, OPP management and the external evaluators focused on the process, and the regular communication between key divisions resulted in the identification and piloting of four different streamlining initiatives;

• The external review successfully quantified the magnitude of the problem:
  – 54 months mean time from RED signature to completion of product reregistration for all products in the case;
  – >10,000 products associated with signed REDs still pending product reregistration – some more than 14 years;
Results – con’t

• 17 out of 21 recommendations from the external review were adopted by OPP management;
Increase in Product Reregistration Outputs

- Product reregistration decisions;

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<th>FY'03</th>
<th>FY'04</th>
<th>FY'05</th>
<th>FY'06</th>
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