



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

OFFICE OF
INSPECTOR GENERAL

May 19, 2022

MEMORANDUM

SUBJECT: Notification of Evaluation:
The EPA's Response to Reported Incidents of Unintended Effects from Pet Collar
Pesticides
Project No. OSRE-FY22-0120

FROM: Laretta Joseph, Director
Programs, Offices, and Centers Oversight Directorate
Office of Special Review and Evaluation

A handwritten signature in black ink, appearing to read "Laretta Joseph", is positioned to the right of the "FROM:" field.

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

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an evaluation to review whether the EPA's response to reported incidents of unintended effects from pet collar pesticides was consistent with Section 6(a)(2) of the Federal Insecticide, Fungicide, and Rodenticide Act. This evaluation is a result of multiple hotline complaints and addresses the following fiscal year 2022 [top management challenge](#) for the Agency: ensuring the safe use of chemicals.

Our objectives are to determine whether (1) the EPA's response to reported pesticide incidents involving Seresto pet collars provides assurance that the collars can still be used without posing unreasonable adverse effects to human health and the environment and (2) the EPA adhered to pesticide registration requirements in its approval of Seresto pet collars, specifically toxicological data requirements in 40 C.F.R. part 158. We plan to conduct our work at EPA headquarters. The evaluation will be conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefit of this evaluation includes greater assurance that the EPA has adequate controls over its pesticide incident reporting process and pesticide registration process that could reduce pesticide exposure and associated health impacts for humans and pets.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an

April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at www.epa.gov/oig.

cc: Janet McCabe, Deputy Administrator
Dan Utech, Chief of Staff, Office of the Administrator
Jon Monger, Associate Deputy Administrator
Wesley J. Carpenter, Deputy Chief of Staff, Office of the Administrator
Jake Li, Deputy Assistant Administrator for Pesticide Programs, Office of Chemical Safety and Pollution Prevention
Edward Messina, Director for Pesticide Programs, Office of Chemical Safety and Pollution Prevention
Janet Weiner, Senior Audit Advisor, Office of Chemical Safety and Pollution Prevention
Cameo Smoot, Audit Liaison, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention
Andrew LeBlanc, Agency Follow-Up Coordinator
José Kercado, Backup Agency Follow-Up Coordinator
Lindsay Hamilton, Associate Administrator for Public Affairs
Lance McCluney, Director, Office of Administrative and Executive Services, Office of the Administrator
Regional Audit Follow-Up Coordinators, Regions 1–10
Sean W. O’Donnell, Inspector General
Charles J. Sheehan, Deputy Inspector General
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Stephanie L. Wright, Assistant Inspector General for Management
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