

Memorandum

Washington, D.C.
June 12, 1986

CAPTAFOL: SPECIAL REVIEW

R. H. Frell

MEMO TO FILE:

Yesterday I visited with Spencer Duffy, the EPA Special Review Manager for Captafol. Duffy replaced Ingrid Sunzenauer when she was transferred to other projects a few months ago. Like Ingrid, he is friendly and personable. His surroundings gave the impression that he is businesslike and efficient.

Duffy was a plant physiologist at USDA's Beltsville Laboratory. He came to EPA when funding cuts abolished his program. He appears to have a good appreciation of the constraints he must operate under at EPA, and he wanted to be sure that we as registrants understand them too. He painted an amazing picture.

Special Reviews are run by interdisciplinary teams consisting of appropriate reviewers from the Hazard Evaluation Division, scientists from the Science Integration Staff, and representatives from policy groups. The Special Review Manager is a coordinator, but the team members are not responsible to him. The teams operate on the theory of "matrix management," which holds that motivation to achieve a common goal produces better group performance than the traditional hierarchical management structure.

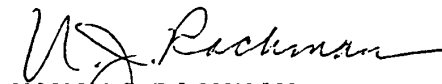
Unfortunately, the common goal is not the high-quality Special Review the theory would predict, but the need of each individual involved to avoid a poor performance rating by his line supervisor.

Duffy explained that once an action such as PD-1 is assigned a date on the EPA fiscal year work schedule, any failure to meet the deadline (for whatever reason) results in poor ratings for everyone involved in the project, from the clerical staff to the Branch Chief (and maybe higher).

It is no wonder that the scientific quality of EPA's Special Reviews is so poor. Before an action is on the calendar, it has no Agency priority so there is no incentive for the team to resolve scientific questions. Once the action is scheduled, they are not given enough time to do so. This will undoubtedly get worse if the Special Review/cancellation process is speeded up per proposed FIFRA amendments.

There is a Catch-22 here for registrants in that anything we do to promote resolution of scientific disputes prior to the appearance of the proceeding on the Agency calendar is likely to raise the action's priority and therefore get it scheduled earlier; the effect is to shorten the time for orderly discussion.

This situation should remind us that the Pesticide Program, publicly sold as "science based" is in fact driven not by scientific considerations but by the same organizational and political forces that drive any bureaucracy. To interact with EPA successfully, we must remember to think, plan and communicate appropriately.


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