

US EPA ARCHIVE DOCUMENT

Timing of Consultations During Registration Review

Continuation of Discussions with the
PPDC

PRIA Process Improvement Workgroup

September 2011

Recap: Consultation Timing Options

- Option 1: Consult at Proposed Registration Review Decision stage

Pros	Cons
Occurs later in the registration review process	Potential to delay final registration review decision
Includes a refined risk assessment	
Includes proposed mitigation	

Recap: Consultation Timing Options

- Option 2: Consult at “Interim” Registration Review Decision stage

Pros	Cons
Occurs at the end of the registration review process	Could be interpreted as a final agency action made in the absence of consultation?
Includes a refined risk assessment	
Includes mitigation	

Recap: Consultation Timing Options

- Option 3: Consult “informally” on preliminary risk assessment and “formally” on proposed decision, if necessary

Pros	Cons
Provides additional information to refine risk assessment	Potential delays in registration review schedule
EPA & the Services engage earlier & same advantages as Option 1	Given limited experience, sustainability of this approach is unclear
Some success with this approach	