

**SUPPORTING STATEMENT
FOR AN INFORMATION COLLECTION REQUEST**

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection:

Pesticide Product Registration Maintenance Fee

EPA No.: 1214.07 OMB No.: 2070-0100

1(b) Short Characterization/Abstract:

This information collection provides a practical means of communication between the registrants and Environmental Protection Agency's Office of Pesticide Programs (OPP) to collect registration maintenance fees from pesticide registrants as required by law. Respondents complete and submit EPA Form 8570-30 (Attachment A) indicating the respondent's liability for the registration maintenance fee.

The first Registration Maintenance Fee filing form was sent to approximately 5,000 pesticide registrant firms in 1989. Since then, the number of respondents has slowly declined from approximately 2800 firms in 1990 to 2500 in 1991, 2350 in 1992, 2250 in 1993, and 2200 in 1994. Since 1994, the number of registrants to which these forms are sent has declined steadily to a total of 1,720 in January, 2006. Each affected firm is required to complete the filing form and submit their fee payment by January 15 of each year.

Annually, the Agency provides registrants a list of the registered products currently registered with the Agency. Registrants are provided the opportunity to review the list, determine its accuracy, and remit payment of the maintenance fee. The list of products has space identified for marking those products to be supported and those products that are to be canceled. The registrants are also instructed to identify any products on the list which they believe to be transferred to another company, and to add to the list any products which the company believes to be registered that are not on the Agency-provided list. The failure to pay the required fee for a product will result in cancellation of that product's registration.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

On October 25, 1988, the Federal Insecticide, Fungicide, and Rodenticide Act was amended in several significant ways. Among the new provisions of the Act was the institution of registration maintenance fees (FIFRA) Section 4(i)(5), Attachment B. These fees apply to all products registered under Section 3 and Section 24(c) of FIFRA. The fees are to be paid annually for each product registered and payable on January 15 of each year beginning in 1989. The authority to collect fees under the 1988 amendments would have terminated on September 30, 1997. However the Food Quality Protection Act extended the authority to collect these fees until September 30, 2001. The EPA Appropriation Bills of FY 2002 and FY 2003 also extended

the authority to collect maintenance fees. The Pesticide Registration Improvement Act (PRIA), which became effective on March 23, 2004, further extended the authority to collect maintenance fees through fiscal year 2008.

2(b) Practical Utility/Users of the Data

In order to provide an efficient system to bill, collect, and account for registration maintenance fees, the Agency has used a filing form which is sent to all registrants of currently active products. The information is used by the Agency to ensure that the fees prescribed by FIFRA have been paid by each registrant. The information is also used to adjust OPP's computer files to reflect changes in the status of registrations resulting from registrant responses.

3. NON DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non duplication

The specific information required under this ICR (i.e., the number of registrations that a given registrant wishes to maintain and, thus, the fee amount that will be remitted to EPA) does not exist in data bases at EPA or any other agency. To determine the amount of maintenance fees accurately, the Agency and the registrant must have a joint understanding concerning the number of products currently registered. An alternative approach considered prior to seeking approval for the original maintenance fee filing form (ICR) was to simply notify registrants that fees were due for each of their products according to a fee schedule. The registrant would submit payment according to their best information concerning the number of registrations that they wanted to support. However, if a registrant submitted payment that did not correspond to the fee schedule, the Agency would be in a position of either unilaterally determining which registrations to cancel, or contacting each registrant to determine that registrant's intentions. This option was considered to be inefficient, and not in the best interest of the Agency or the registrants.

3(b) Public Notice Required Prior to ICR Submission to OMB

In preparing to renew this ICR, EPA published a notice in the Federal Register which provided a 60-day public notice and comment period on the draft ICR (see 71 FR 62432; October 25, 2006). EPA did not receive any comments in response to that notice.

3(c) Consultations

Consultation and/or dialogue between respondents and the Agency is frequent and on-going. In addition to phone conversations, e-mails, and letters, Agency personnel participate in meetings with individual registrants as well as gatherings of large groups of registrants from time to time. These communications permit an exchange of issues, problems, and solutions on many issues.

During the preparation of this ICR renewal, EPA staff contacted the following

representatives of pesticide registrants by phone or e-mail and asked them for their assessment of the burden estimates in the ICR:

Kim Davis,
RegWest Company, LLC
30856 Rocky Road
Greeley, CO 80631
(970) 353-0611
Kim@regwest.com
(Consultant representing 36 companies
holding 1 to 16 registrations)
Donna Leventhal
Delta Analytical
7910 Woodmont Avenue
Bethesda, MD 20814
(301) 652-5495
(Consultant representing 22 companies
holding 1 to 16 registrations)

Bob Werdig
Pesticide Registration Association
715 8th Street S.E.
Washington DC 20003
(202) 546-3260
(Consultant representing 4 companies
holding 1 to 4 registrations)

William Mahrlburg
Nufarm
2300 Frederick Avenue Suite 208
St. Joseph, MO 64504
(816) 676-9000
(Company holds 393 registrations)

All four of the above respondent representatives provided feedback to a questionnaire about the collection process (see Attachment D). As is the case with pesticide registrant companies, the above respondents vary widely in company size and structure. This variability among companies included in this consultation resulted in variable responses. The average time required to complete the maintenance fee filing form depends upon the number of registrations held by the registrant. Larger companies with more registered pesticide products will take longer to complete the form, on average, than companies with fewer registrations. The time required to complete the form estimated by the above respondents ranged from 10 minutes to half an hour, all less than the estimated 0.96 hours used in this ICR renewal. In general, it appears that the Agency's burden estimates used are equal to or higher than those actually incurred, and have not been revised.

The four respondent representatives were also asked their opinion of and desire for electronic reporting. Again, responses varied but they indicated some concern over security and electronic signatures. One respondent indicated that electronic reporting would not change the burden relative to paper responses, one said it would actually increase the burden, and the other two said it could increase the burden for some and decrease it for others. Two of the respondents said that they would still need to send a check to EPA, even if the form were submitted electronically, thereby undermining the benefit of electronic reporting.

Due to these responses, and similar feedback received informally from other registrants, it is apparent that at least some may prefer electronic reporting and payment and that some burden reduction may be realized. EPA will work with the Treasury Department to implement electronic payment of maintenance fees via <http://www.pay.gov>. The Agency anticipates that this capability will be in place for the FY08 collection cycle and intends to offer the option of secure electronic reporting and payment at that time.

3(d) Effects of Less Frequent Collection

The payment of maintenance fees for all pesticide products is mandated in FIFRA amendments to occur annually. Thus, there can be no option other than to require a minimum submission of the filing form once a year. Less frequent information collection in this area would violate the statute.

3(e) General Guidelines

With respect to the PRA imposed guidelines contained in 5 CFR 1320.6, this information collection activity has the following features:

- The respondents are required to respond on an annual basis and hence the quarterly response limitation is not applicable
- The respondents are not required to keep records relating to this information collection for a period of more than 3 years.
- This information collection activity does not utilize a statistical survey. The requirement to collect maintenance fees for all products means that all pesticide registrants submit replies.
- The respondents are given at least 30 days to respond.
- The information collection under this ICR can be held confidential under long established procedures for properly handling Confidential Business Information. Confidentiality is discussed in more detail below.
- The respondents are not required to submit more than an original and two copies of any document.
- The ICR is for processing of fees mandated by Congress. No provision in the law allows for remuneration of respondents.
- This information collection activity has used automation to the extent practicable without electronic reporting and payment. For example, the name and address of each respondent is pre-printed by computer, alleviating the registrant of the burden of writing it in. A computer generated listing of products is also provided, and the registrant must only circle an appropriate keyword (CAN, PAY) etc. Because the regulated community runs the gamut from large multinational corporations to small sole proprietor firms, some with limited technological capabilities, the Agency believes that a simple filing form may continue to be preferred by some but that others may now prefer electronic reporting and payment (see section 3(c), above). EPA will work with the Treasury Department to implement electronic payment of maintenance fees via <http://www.pay.gov>. The Agency anticipates that this capability will be in place for the FY08 collection cycle and intends to offer the option of secure electronic reporting and payment at that time.
- As discussed in Section 4(c), this form requires the minimum amount of information from all firms.

- This collection activity does not apply to grantees.

3(f) Confidentiality

Product registration maintenance fee information submitted by pesticide registrants under this ICR is considered by OPP to contain no confidential business information (CBI). If, however, registrants submit data that contains CBI or relates to trade secrets or commercial or financial information, such information is protected from disclosure under section 10 of FIFRA. Such data submitted to the EPA are handled strictly in accordance with provisions of the FIFRA Confidential Business Security Manual. This manual contains instructions relative to all contact with confidential documents including responsibilities of EPA employees physical security measures; CBI copying and destruction procedures; transfer of CBI materials within the EPA to contractors or other government offices; computer security; CBI typing procedures; and procedures internal to OPP. The manual dictates that all CBI must be kept in secure (double-locked) areas, and all CBI intended to be destroyed must be cleared by a Document Control Officer and shredded.

3(g) Sensitive Questions

No information of a sensitive or private nature is requested in conjunction with this collection activity. Further, this information collection activity complies with the provisions of the Privacy Act of 1974 and OMB circular A-108.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

All pesticide registrants holding currently active registrations under FIFRA section 3 and Section 24(c) are subject to this information collection activity. These include pesticide companies and state governments. The North American Industrial Classification System (NAICS) codes are **325320** (Pesticide and other Agricultural Chemical Manufacturing) and **9641** (Regulation of Agricultural Marketing and Commodities).

4(b) Information Requested

4(b)(i) Data Items, Including Record Keeping Requirements

Part A -- Registrant Identification	Registrant Name and Address are pre-printed. The registrant needs to complete this section only to indicate a name and/or address change.
Part B -- EPA Company Numbers	If a firm has been assigned more than one company number, the firm may combine its fee payments under a single number by writing in all of the company numbers for which the firm is paying.
Part C -- Maintenance Fee Calculation	The respondent must fill in the number of registrations for which he is paying the fee, number of registrations which he believes to be transferred, number of registrations to be canceled, number of registrations which he believes to be in error, total fee amount due, and check number.
Part D -- Authorized Company Representative or Agent	The respondent must print the name and title of the company representative or agent. The respondent must sign and date the form, and provide the telephone number of the respondent.

4(b)(ii) Respondent Activities

Activities in which a registrant must engage in order to comply with this collection include the following:

Read instructions	Read accompanying instructions to understand how to fill out form, annotate list of registrations, and calculate fee due.
Plan Activities	Plan the activities necessary to respond to the billing.
Review Information	Review the attached listing of registrations and compare to the firm's records.
Complete Paperwork	Annotate attached listing of registrations to indicate which products the respondent is paying and which products are to be canceled or transferred.
File Information	Maintain a copy of the form in company files. Although this is not required, the Agency assumes that most companies will retain this information as a common business practice.

The existing paper version form is printed on 3 part NCR paper. The respondent sends one copy along with payment to the Headquarters Accounting Operations Branch Lock Box in St. Louis and the second copy together with the annotated list of products to OPP via a designated Washington D.C. area mail box. The third copy is retained by the respondent for his own records. Information contained on the forms returned to OPP is used to check and ensure that the proper amount of fees have been submitted by each registrant. In the past there has been a need for follow-up with some registrants when the information provided indicates that there has been a misunderstanding of the requirements. For the most part these have been handled by telephone. There is also a toll free information line available which registrants may use to ask questions and resolve problems regarding their maintenance fee payments. The information provided also serves as an update for pesticide product information files. Updates of the Agency's files are an ongoing process.

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION

METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The following activities are necessary to conduct the information request:

Develop Letter	Prepare a cover/transmittal letter to be included in the package.
Answer Questions	Staff a toll free information line to respond to any questions that respondents have regarding payment requirements.
Review Submissions	Review submitted forms and annotated listings for completeness.
Record Submissions	Record information provided by respondents into a tracking system. Make adjustments to Product Information Master Files as required.
Verify Payments	Cross check payment information from Financial Management Division to ensure that payment has been received.
Store Data	Image all forms, listings, and telephone conversation logs for archiving.

5(b) Collection Methodology and Management

For the past 17 years, the Agency has employed the same method of collecting maintenance fees. This method involves using OPP master files of product information to identify the firms to which the billing information is to be sent. Computer generated listings of products are mailed to each firm along with the Maintenance Fee Filing Form. The registrant is instructed to circle the word PAY, CAN, XFR, ERR, next to each Registration Number to indicate if he wants to pay for the registration, cancel the registration, indicate if he believes that the registration was transferred, or if the registration is listed in error.

The list of registrations is pre-loaded into a tracking file, and only the PAY, CAN, XFR, ERR indicator is keyed manually for each product. Company name and address information is also pre-loaded reducing the data entry burden for the maintenance fee filing forms. The total number of products for each company is calculated by computer, and totals entered from the filing form are verified by computer to ensure that all items balance. In addition, data entry for all forms is quality checked visually.

Receipt of payment is entered by the Financial Management Division into the Integrated Financial Management System (IFMS). This information is then extracted and posted to the maintenance fee tracking system to close out each record. Results are made available to OPP staff on request as soon as the information is entered into the tracking system.

5(c) Small Entity Flexibility

The Agency's filing form for the submission of maintenance fees requires the minimum amount of information that is needed to provide adequate communication between pesticide product registrants and the Agency. The needs of small businesses were of primary concern in

designing the filing form. The respondents are asked to provide only readily available information. Experience indicates that there is no need for more involved reporting by large business concerns to meet Agency needs. Hence, there is no separate requirement for small businesses versus large business. Only the basic requirement to identify products that firms wish to continue to support is imposed on all registrants. In 1990 the fee structure was changed to provide a 50% discount on the first product supported. Therefore, companies with only one registered product received the greatest benefit from the discount.

5(d) Collection Schedule

The payment of maintenance fees for all pesticide products is mandated in FIFRA to occur annually. Thus, there can be no option other than to require a minimum submission of the filing form once a year. Less frequent information collection in this area would violate the statute.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Experience has shown that the average burden per respondent has remained at approximately 1 hour. The agency believes that the decline in actual burden hours is due to the fact that registrants now have 17 years of experience with the form, and the attrition of former pesticide firms that no longer hold pesticide registrations not required to complete this form. In 2006, 1,720 firms responded to the collection request. A summary of firms and their number of registrations is provided below.

Table 1. Number of Registrations Held by Registrants (Summary)

Number of Products	Number of Registrants	Registrants Cumulative total	Cumulative %
1 – 10	1,477	1,477	86%
11 – 20	95	1,572	91%
21 – 50	78	1,650	96%
50 - 100	32	1,682	98%
> 100	38	1,720	100%

Based on consultations with several respondents, both in the past and for this ICR renewal, we believe that the average time required to complete the maintenance fee filing form depends upon the number of registrations held by the registrant. A list of the registrants contacted for this renewal is contained in Attachment C. Below is the breakdown of the burden associated with the 2006 maintenance fee filing based on registrant-supplied information.

Table 2. Respondent Burden, by Number of Registrations Held

Number of Products	Avg Time (hrs.)	Number of Registrants	Tot. Hr.
1 – 10	0.75	1,477	1108
11 – 20	1.0	95	95
21 – 50	2.0	78	156
51 – 100	3.0	32	96
> 100	5.0	38	190
Totals		1,720	1,645

PAPERWORK BURDEN:

1645 (total hours) / 1720 (number of respondents) = 0.96 hrs./response.

These calculations were made using the average case scenario. The average case burden was developed from the above table.

Table 2a. Average Respondent Burden

Collection Activities	Management	Technical	Clerical	Hours
1. Read Instructions		0.25		0.25
2. Plan Activities	0.20			0.20
3. Review Information	0.20			0.20
4. Complete Paperwork		0.20		0.20
5. File Information			0.11	0.11
Total	0.40	0.45	0.11	0.96

Total Annual Burden: Avg. Hr. per form (0.96) X No. Of Respondents (1720) = 1645 hrs.

6(b) Estimating Respondent Costs

For a period of some years, when estimating labor rates for most OPP program ICR renewals, the Agency adjusted the ICR renewal labor rates by using methods such as the NASA Gross Domestic Product (GDP) Deflator Inflation Calculator to index the labor cost for a particular year. However, in July 2006, Agency economists completely re-estimated wages, benefits, and overhead for all labor categories for the pesticide industry, state government and Agency employees. The Agency analysis uses currently available information on labor rates and other benefits from publicly available websites. A copy of the methodology used to re-estimate the labor rates and formulas used to derive the fully loaded rates and overhead costs are listed in Attachment C.

To derive the labor rates for this ICR, Agency economists estimated the wages for the management, technical, and clerical labor categories using the methodology cited above. The respondent costs for this renewal for managerial, technical and clerical rates are estimated at \$100.86, \$64.80, and \$33.05 per hour, respectively. These labor rates are fully loaded and include benefits and overhead costs.

The table below describes the average costs for completing one maintenance fee filing form. The average hourly burden was derived from conversations with a selected group of respondents, and is described above.

Table 3. Average Respondent Paperwork Costs

Collection Activities	Mgmt. (\$100.86/hr)	Tech. (\$64.80/hr)	Cler. (\$33.05/hr)	Costs (\$)
1. Read Instructions		0.25		16.20
2. Plan Activities	0.20			20.17
3. Review Information	0.20			20.17
4. Complete Paperwork		0.20		12.96
5. File Information			0.11	3.64
TOTALS	0.4 (\$40.34)	0.45 (\$29.16)	0.11 (\$3.64)	73.14

ANNUAL PAPERWORK BURDEN: 0.96 hours X 1720 respondents = 1645 hrs.

ANNUAL PAPERWORK COSTS:

(a) Management: 0.40 hrs. X \$100.86/hr. X 1720 respondents = \$69,392
 (b) Technical: 0.45 hrs. X \$64.80/hr. X 1720 respondents = 50,155
 (c) Clerical: 0.11 hrs. X \$33.05/hr. X 1720 respondents = 6,253
 TOTAL = \$125,800

6(c) Estimating Agency Burden and Cost

The cost to the Federal Government for this ICR is estimated to be \$86,319. This is based on actual experience, and the following table and calculations reflect averages.

Table 4. Agency Burden Hours per filing form and Total Cost

Collection Activities	Mgmt. (\$93.07/hr)	Tech. (\$66.34/hr)	Cler. (\$47.17/hr)	Total Cost (\$)
1. Generate Listings/Mass Mailing*		8	16	1285.44
2. Pre-load Tracking Data*		4		265.36
3. Receive/Review Submissions			0.2	16,226.48
4. Enter Data into Tracking Sys.			0.2	16,226.48
5. Reconcile Discrepancies		0.5		3,317
6. Respond to Questions		0.5		9,951
7. Verify Payment		0.2		22,820.96
8. File Documents			0.2	16,226.48

Total		N/A	N/A	86,319.20
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* Estimated burden hours for items 1 and 2 reflect the entire set of forms and the entire set of data pre-loaded. The unit burden (per filing form) for this operation is so small that it would not be appropriate to express these figures in terms of units. All other figures reflect the burden for processing an average filing form. Therefore, the burden figures are not additive.

Item 3: 1720 responses X 0.2 hr. X \$47.17 per hour = 16,226.48

Item 4: 1720 responses X 0.2 hr. X \$47.17 per hour = 16,226.48

Item 5: 100 discrepancies X 0.5 hr. X \$66.34 per hour = 3,317

Item 6: 300 questions X 0.5 hr X \$66.34 per hour = 9,951

Item 7: 1720 payments X 0.2 hr X \$66.34 per hour = 22,820.96

Item 8: 1720 responses X 0.2 hr. X \$47.17 per hour = 16,226.48

6(d) Bottom Line Burden Hours and Cost Tables

Table 5. Total Annual Respondent and Agency Burden and Costs

	Total	
	Hours	Costs
Annual Respondent Burden/Cost Estimates	1,645	\$125,800
Annual Agency Burden/Cost Estimates	1,588	\$86,319

6(e) Reasons for Change in Burden

The total annual burden for respondents associated with this renewal is 1,645 hours. This reflects a decrease of 118 hours from the last renewal period. The decrease represents the steady decline of the number of pesticide registrants and, therefore, participation under this program. In 2006, the estimate is 1,720 registrants. This represents a decrease of 157 respondents from the 1,877 reported in the last ICR renewal. The average time required to complete the maintenance fee filing form depends upon the number of registrations held by the registrant. In addition to fewer respondents in 2006, a smaller percentage of registrants held a small number of registered products. This shift to a slightly larger average number of registrations per registrant resulted in a slight increase in the average burden hours required to complete the form, from 0.94 hours in the last ICR renewal, to 0.96 hours. This change is an adjustment.

6(f) Burden Statement

The annual "respondent" (applicant) burden for the **Pesticide Product Registration Maintenance Fee** program is estimated to average 0.96 hours per form, or per respondent, as there is one form per respondent. According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection, it is the time reading the regulations, planning the necessary activities, reviewing the information, and completing the maintenance fee filing form. The agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control number for this information collection appears at

the beginning and the end of this document, as well as on the maintenance fee filing form itself.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPP-2006-0660, which is available for online viewing at www.regulations.gov, or in person viewing at the OPP Regulatory Public Docket in Rm. S-4400, One Potomac Yard (South Building), 2777 S. Crystal Drive, Arlington, VA. This docket facility is open from 8:30 a.m. to 4 p.m., Monday through Friday, excluding legal holidays. The docket telephone number is (703) 305-5805. You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques.

Submit your comments, referencing Docket ID No. EPA-HQ-OPP-2006-0631 to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Public Information and Records Integrity Branch (PIRIB), Mail Code: 7502P, Office of Pesticide Programs (OPP), Environmental Protection Agency, 1200 Pennsylvania Ave., NW, Washington, DC 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503.

~~Comments may be submitted to EPA electronically through <http://www.regulations.gov> or by mail addressed to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. You can also send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Include docket ID No. EPA-HQ-OPP-2006-0660 and OMB control number 2070-0100 in any correspondence but do not submit fee waiver requests to these addresses. The information described in this ICR is to be submitted to the address identified in section 4(b) of this supporting statement.~~

ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA-HQ-OPP-2006-0660. These attachments are available for online viewing at www.regulations.gov or otherwise accessed as described in section 6(f) of the supporting statement.

Attachment A: EPA Form 8570-30 - Pesticide Registration Maintenance Fee Filing Form. Also available electronically at www.epa.gov/opprd001/forms/8570-30.pdf

Attachment B The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 4(i)(5). Also available electronically at <http://www.epa.gov/opp00001/regulating/fifra.pdf>

Attachment C: *Methodology for Estimating OPP ICR Wage Rates for Industry, State and EPA Labor Costs*; Memo From Richard Keigwin, Director Biological and Economic Analysis Division, to Bill Diamond, Arnold Layne, Lois Rossi and Elizabeth Leovey; July 25, 2006.

Attachment D: Record of Consultations Between the U.S. Environmental Protection Agency and Respondents to the Information Collection Request: "Pesticide Product Registration Maintenance Fee"

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