	TABLE 1A. ESTIMATED ANNUAL BURDEN AND LABOR COST TO INDUSTRY TO IMPLEMENT												
	REPORTING AND RECORDKEEPING REQUIREMENTS -- FIRST YEAR												
Section of Notice	Burden Item	Form Number (if any)	(A) Respondents per year	(B) Number of occurrences per year	(C) Total Annual Occurrences (C=A*B)	(D1) Person-hours per occurrence	(D2) Number of tests per occurrence	(E1) Technical person -hrs. per year (E1=C*D1)	(E2) Number of tests per year (E2=C*D2)	(F1) Wage Class ($ per hour)	(F2) Unit cost	(G) Annual costs (=E1*F1), (=E2*F2), or (=C*F2)	Foot-notes
--	**Read Rule**												
	Manufacturers		1660	1	1660	4		6640		49.98		$331,867	a
	Vendors		200	1	200	4		800		49.98		$39,984	a
	Other entities		166	1	166	4		664		49.98		$33,187	a
2904.5	**Initial Approval Applications**												
(a)(1)	Fill in form	2904-1	569	6.00	3414	4		13656		49.98		$682,527	b
(a)(1)	Biobased Content - Testing (products in designated items)		569	2.19	1245	na	1	na	1245	na	500	$622,500	c
(a)(1)	Biobased Content - Testing (products not in designated items)		569	2.71	1544	na	1	na	1544	na	500	$772,000	d
(b)	**Initial Approval Application Evaluation**												
(b)(1)	Address Deficiencies		569	0.60	341	2		682		49.98		$34,086	e
(c)	**Issuance of Notice of Certification**												
(c)(1)-(5)	Provide information to USDA for Web site		569	5.70	3244	4		12976		49.98		$648,540	f
2904.6	**Appeals**												
(a)(1)	Appeal of denial of initial certification		569	0.30	171	40		6840		49.98		$341,863	g
2904.5(d)(3)	**Subsequent Approval Applications - Reformulated Products**												
2904.5(a)(1)	Fill in form	2904-1	0	0	0			0		49.98		$0	h
2904.5(a)(1)	Biobased Content - Testing		0	0	0			na		na		$0	h
2904.5(c)(1)-(5)	Provide information to USDA for Web site		0	0	0			0		49.98		$0	h
2904.10	**Records**												
(a)(1)	Biobased content test results		569	5.70	3244	1		3244		49.98		$162,135	i
(a)(2)	Dates (certification periods, testing)		569	5.70	3244	0.5		1622		49.98		$81,068	i
(a)(3)	Documentation of environmental claims		569	5.70	3244	0.25		811		49.98		$40,534	i
--	**Label Redesign**		569	2.85	1622	na		na		na	8600	$13,949,200	j
	TOTAL BURDEN (HRS) AND COSTS			40.5	21,313			47,935				$17,739,491	

Footnotes To Table 1A

a Assumes 1,860 existing manufacturers and vendors read the rule in year 1, with 830 manufacturers making products within designated items, 830 different manufacturers making products not within designated items, and 200 vendors. For other entities, assumes the number of other entities who read the rule is 10 percent of the number of manufacturers who read the rule (1660 x 0.10 = 166).

b Assumes that there are 500 different manufacturers making products within the 100 items designated in year 1. Assumes that 60 percent of these 500 manufacturers will submit applications, that 30 percent of the 830 manufacturers making products not within a designated item will submit applications, and that 10 percent of the 200 vendors will submit applications in year 1, for a total of 569 manufacturers and vendors. Assumes each entity submits 6 applications. This results in a total of of 3,414 applications in year 1. Of the 120 vendor applications, 70 applications were assumed to be for products within designated items and 50 were assumed to be for products not within designated items. Based on these assumption, 1,870 of the 3,414 applications would be for products within designated items and 1,544 of the 3,414 applications would be for products not within designated items.

c Assumes two-thirds of the 1,870 products within designated items need to have their biobased content tested (the other one-third of the products have already had their biobased content tested during the designation of the item (1,870 x 2/3 = 1,245). Assuming even distribution among the 569 applicants, this averages to about 2.2 products per applicant.

d Assumes all of the 1,544 products in non-designated items need to have their biobased content tested. Assuming even distribution among the 569 applicants, this average to about 2.7 products per applicant.

e Assumes 10% of the 3,414 initial approval applications will have deficiencies that need to be addressed. This averages to about 0.6 deficiencies per applicant.

f Assumes 90% of the 3,414 initial approval applications are approved; 10% are denied and of those 10% denied, 50% are appealed and all appeals are successful (i.e., application is approved). This yields a total of 3,244 certified products. This averages to about 5.7 certified products per applicant.

g Assumes 10% of the 3,414 initial approval applications will be denied and 50% of those will be appealed. This results in 171 appeals (= 3,414 x 0.1 x 0.5), which averages to about 0.3 appeals per applicant.

h Assumes that none of the certified products are revised in year 1 that require subsequent certification through a new application.

i Based on 3,244 products being certified for use of the label and 569 manufacturers and vendors. This averages to 5.7 certified products per manufacturer/vendor.

j Assumes: (1) 2 labels per certified product and (2) 25% of labels would be revised before next scheduled label change. (3,244*2*0.25=1,622; equivalent to 2.85 per manufacturer/vendor).

	TABLE 1B. ESTIMATED ANNUAL BURDEN AND LABOR COST TO INDUSTRY TO IMPLEMENT												
	REPORTING AND RECORDKEEPING REQUIREMENTS -- SECOND YEAR												
Section of Notice	Burden Item	Form Number (if any)	(A) Respondents per year	(B) Number of occurrences per year	(C) Total Annual Occurrences (C=A*B)	(D1) Person-hours per occurrence	(D2) Number of tests per occurrence	(E1) Technical person -hrs. per year (E1=C*D1)	(E2) Number of tests per year (E2=C*D2)	(F1) Wage Class ($ per hour)	(F2) Unit cost	(G) Annual costs (=E1*F1), (=E2*F2), or (=C*F2)	FOOT-NOTES
--	**Read Rule**												
	Manufacturers		0	0	0	4		0		49.98		$0	a
	Vendors		0	0	0	4		0		49.98		$0	a
	Other entities		0	0	0	4		0		49.98		$0	a
2904.5	**Initial Approval Applications**												
(a)(1)	Fill in form	2904-1	294	6.00	1764	4		7056		49.98		$352,659	b
(a)(1)	Biobased Content - Testing (products in designated items)		294	1.63	478	na	1	na	478	na	500	$239,000	c
(a)(1)	Biobased Content - Testing (products not in designated items)		294	3.56	1046	na	1	na	1046	na	500	$523,000	d
(b)	**Initial Approval Application Evaluation**												
(b)(1)	Address Deficiencies		294	0.60	176	2		352		49.98		$17,593	e
(c)	**Issuance of Notice of Certification**												
(c)(1)-(5)	Provide information to USDA for Web site		294	5.40	1588	4		6352		49.98		$317,473	f
2904.6	**Appeals**												
(a)(1)	Appeal of denial of initial certification		294	0.30	88	40		3520		49.98		$175,930	g
2904.5(d)(3)	**Subsequent Approval Applications - Reformulated Products**												
2904.5(a)(1)	Fill in form	2904-1	162	1	162	4		648		49.98		$32,387	h
2904.5(a)(1)	Biobased Content - Testing		162	1	162	na	1	na	162	na	500	$81,000	h
2904.5(c)(1)-(5)	Provide information to USDA for Web site		162	1	162	2		324		49.98		$16,194	h
2904.10	**Records**												
(a)(1)	Biobased content test results		863	5.70	4920	1		4920		49.98		$245,902	i
(a)(2)	Dates (certification periods, testing)		863	5.70	4920	0.5		2460		49.98		$122,951	i
(a)(3)	Documentation of environmental claims		863	5.70	4920	0.25		1230		49.98		$61,475	i
--	**Label Redesign**		294	2.85	838	na		na		na	8600	$7,206,800	j
	TOTAL BURDEN (HRS) AND COSTS			40.4	21224			26862				$9,392,363	

Footnotes to Table 1B

a Assumes everyone has read rule in year 1.

b Assumes that there are 180 different manufacturers making products within the 36 items designated in year 2. Assumes that 60 percent of these 180 manufacturers will submit applications, that another 20 percent of the 830 manufacturers making products not within a designated item will submit applications, and that another 10 percent of the 200 vendors will submit applications in year 2, for a total of 294 manufacturers and vendors. Assumes each entity submits 6 applications. This results in a total of of 1,764 applications in year 2. Of the 120 vendor applications, 70 applications were assumed to be for products within designated items and 50 were assumed to be for products not within designated items. Based on these assumption, 718 of the 1,764 applications would be for products within designated items and 1,046 of the 1,764 applications would be for products not within designated items. Assumes all manufacturers submitting applications in year 2 are different from those in year 1.

c Assumes two-thirds of the 718 products within designated items need to have their biobased content tested (the other one-third of the products have already had their biobased content tested during the designation of the item (718 x 2/3 = 478). Assuming even distribution among the 294 applicants, this averages to about 1.6 products per applicant.

d Assumes all of the 1,046 products in non-designated items need to have their biobased content tested. Assuming even distribution among the 294 applicants, this average to about 1.1 products per applicant.

e Assumes 10% of the 1,764 initial approval applications will have deficiencies that need to be addressed. This averages to about 0.6 deficiencies per applicant.

f Assumes 90% of the 1,764 initial approval applications are approved; 10% are denied and of those 10% denied, 50% are appealed and all appeals are successful (i.e., application is approved). This yields a total of 1,676 certified products. This averages to about 5.7 certified products per applicant.

g Assumes 10% of the 1,764 initial approval applications will be denied and 50% of those will be appealed. This results in 88 appeals (= 1,764 x 0.1 x 0.5), which averages to about 0.3 appeals per applicant.

h Assumes 5% of the 3,244 (3,244*0.05 = 162) certified products from the first year are reformulated to the extent that they need new applications, and that each is from a separate manufacturer.

i Based on 4,920 products (3,244 from year 1and 1,676 from year 2) being certified for use of the label and 863 manufacturers and vendors (569 from year 1 and 294 from year 2). This averages to 5.7 certified products per manufacturer/vendor.

j Assumes: (1) 2 labels per certified product and (2) 25% of labels would be revised before next scheduled label change. (1,676*2*0.25=838; equivalent to 2.85 per manufacturer/vendor).

	TABLE 1C. ESTIMATED ANNUAL BURDEN AND LABOR COST TO INDUSTRY TO IMPLEMENT												
	REPORTING AND RECORDKEEPING REQUIREMENTS -- THIRD YEAR												
Section of Notice	Burden Item	Form Number (if any)	(A) Respondents per year	(B) Number of occurrences per year	(C) Total Annual Occurrences (C=A*B)	(D1) Person-hours per occurrence	(D2) Number of tests per occurrence	(E1) Technical person -hrs. per year (E1=C*D1)	(E2) Number of tests per year (E2=C*D2)	(F1) Wage Class ($ per hour)	(F2) Unit cost	(G) Annual costs (=E1*F1), (=E2*F2), or (=C*F2)	FOOT-NOTES
--	**Read Rule**												
	Manufacturers		0	0	0	4		0		49.98		$0	a
	Vendors		0	0	0	4		0		49.98		$0	a
	Other entities		0	0	0	4		0		49.98		$0	a
2904.5	**Initial Approval Applications**												
(a)(1)	Fill in form	2904-1	193	6.00	1158	4		4632		49.98		$231,507	b
(a)(1)	Biobased Content - Testing (products in designated items)		193	2.10	406	na	1	na	406	na	500	$203,000	c
(a)(1)	Biobased Content - Testing (products not in designated items)		193	2.84	548	na	1	na	548	na	500	$274,000	d
(b)	**Initial Approval Application Evaluation**												
(b)(1)	Address Deficiencies		193	0.60	116	2		232		49.98		$11,595	e
(c)	**Issuance of Notice of Certification**												
(c)(1)-(5)	Provide information to USDA for Web site		193	5.70	1100	4		4400		49.98		$219,912	f
2904.6	**Appeals**												
(a)(1)	Appeal of denial of initial certification		193	0.30	58	40		2320		49.98		$115,954	g
2904.5(d)(3)	**Subsequent Approval Applications - Reformulated Products**												
2904.5(a)(1)	Fill in form	2904-1	246	1	246	4		984		49.98		$49,180	h
2904.5(a)(1)	Biobased Content - Testing		246	1	246	na	1	na	246	na	500	$123,000	h
2904.5(c)(1)-(5)	Provide information to USDA for Web site		246	1	246	2		492		49.98		$24,590	h
2904.10	**Records**												
(a)(1)	Biobased content test results		1056	5.70	6020	1		6020		49.98		$300,880	i
(a)(2)	Dates (certification periods, testing)		1056	5.70	6020	0.5		3010		49.98		$150,440	i
(a)(3)	Documentation of environmental claims		1056	5.70	6020	0.25		1505		49.98		$75,220	i
--	**Label Redesign**		193	2.85	550	na		na		na	8600	$4,730,000	j
	TOTAL BURDEN (HRS) AND COSTS			40.5	22734			23595				$6,509,278	

Footnotes to Table 1C

a Assumes everyone has read rule in year 1.

b Assumes that there are 150 different manufacturers making products within the 30 items designated in year 2. Assumes that 60 percent of these 150 manufacturers will submit applications, that another 10 percent of the 830 manufacturers making products not within a designated item will submit applications, and that another 10 percent of the 200 vendors will submit applications in year 2, for a total of 193 manufacturers and vendors. Assumes each entity submits 6 applications. This results in a total of of 1,158 applications in year 2. Of the 120 vendor applications, 70 applications were assumed to be for products within designated items and 50 were assumed to be for products not within designated items. Based on these assumption, 610 of the 1,158 applications would be for products within designated items and 548 of the 1,158 applications would be for products not within designated items. Assumes all manufacturers submitting applications in year 3 are different from those in year 1 and year 2.

c Assumes two-thirds of the 610 products within designated items need to have their biobased content tested (the other one-third of the products have already had their biobased content tested during the designation of the item (610 x 2/3 = 406). Assuming even distribution among the 276 applicants, this averages to about 1.5 products per applicant.

d Assumes all of the 548 products in non-designated items need to have their biobased content tested. Assuming even distribution among the 193 applicants, this average to about 2.8 products per applicant.

e Assumes 10% of the 1,158 initial approval applications will have deficiencies that need to be addressed. This averages to about 0.6 deficiencies per applicant.

f Assumes 90% of the 1,158 initial approval applications are approved; 10% are denied and of those 10% denied, 50% are appealed and all appeals are successful (i.e., application is approved). This yields a total of 1,100 certified products. This averages to about 5.7 certified products per applicant.

g Assumes 10% of the 1,158 initial approval applications will be denied and 50% of those will be appealed. This results in 58 appeals (= 1,158 x 0.1 x 0.5), which averages to about 0.3 appeals per applicant.

h Assumes 5% of the 3,244 certified products from the first year and 5% of the 1,676 certified products from the second year are reformulated to the extent that they need new applications, and that each is from a separate manufacturer.

i Based on 6,020 products (3,244 from year 1; 1,676 from year 2; and 1,100 from year 3) being certified for use of the label and 1,056 manufacturers and vendors (569 from year 1; 294 from year 2; and 193 from year 3). This averages to about 5.7 certified products per manufacturer/vendor.

j Assumes: (1) 2 labels per certified product and (2) 25% of labels would be revised before next scheduled label change. (1,100*2*0.25=550; equivalent to 2.85 per manufacturer/vendor).

	(A) Respondents per year *	(B) Number of occurrences per year	(C) Total Annual Occurrences (C=A*B)	(D1) Person-hours per occurrence	(D2) Number of tests per occurrence	(E1) Technical person -hrs. per year (E1=C*D1)
First Year	569	40.5	21,313			47,935
Second Year	863	40.4	21,224			26,862
Third Year	1056	40.5	22,734			23,595
Average	**829**	**40.5**	**21,757**			**32,797**

Average annual labor costs = $1,639,211

* number of entities filing applications, keeping records, and submitting reports.