Consultation Questionnaire for OPP ICR:
Compliance Requirement for Child-Resistant Packaging
OMB Control # 2070-0052)

- Completed by:
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Updated ICR Document:

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EPA Questions asked in Consultation

(1) Publicly Available Data

$ Is the Child-Resistant Packaging (CRP) data that the Agency seeks for your product(s) available from any public source, or already collected by another office at EPA or by another agency? No not that I am aware of.

$ If yes, where can you find the CRP data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they are not specific to your package/bait station?)

(2) Frequency of Collection

$ Is submitting CRP certification with/without data when a change in packaging occurs too frequent? No.

(3) Clarity of Instructions

$ CRP regulations require respondents provide CRP certifications, CRP test data, and CRP exemption requests to ensure that the Agency can ascertain if CRP is protecting children from serious illness or injury resulting from handling, using, or ingesting certain products.

$ Based on the regulations, PR Notices, CRP webpage, etc., is it clear what type of CRP information you are required to submit (e.g. CRP certification with/without data, etc.) and how to submit such data? If not, what suggestions do you have to clarify the instructions? It would be helpful to have more a clear process on

determining if a product is subject to CPR. A decision tree that works through the criteria and exemptions (much like the PRIA decision tree) would be very helpful.

$ Do you understand that you are required to maintain CRP records for the life of the pesticide product registration? Yes

$ There are no forms associated with CRP. Is the submission format for CRP certifications and/or CRP data, clear, logical, and easy to complete? Yes, but it would be helpful for EPA to post example for reference.

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

$ Currently CRP data may be submitted electronically in addition to a hard copy to expedited data analysis. What do you think about this option? Other electronic reporting alternatives include the use of Aweb forms@/XML based submissions via the Agency=s Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc. Electronic submission via portal would be preferred. Electronic submission via a CD ROM works fine though.

$ Are you keeping your records electronically? If yes, in what format? Adobe Acrobat (pdf)

(5) Burden and Costs

- Are the clerical and technical burden hours in the 2 tables below accurate? These figures are based on 2013 projections. **Table I** associates the various types of CRP actions a respondent may do and the number of technical hours and clerical hours per event. Please note this table reflects 2010 comments regarding burden hours per CRP action. Please remember this burden may cover more than one product registration. **Table II** spreads out a 4.2 hour burden per action in 0.1 hour increments. This not the time for self-certification without data or any other specific CRP type action. This is the time average based on registration actions spread out over self certification, certification with data, exemptions, etc. The time per action multiplied by the number of actions, and the sum of all registration actions time spent divided by the number of actions. **For example** using burden estimates say 10 registration actions with say 6 being self certifications @1.5 hr =9, 3 certification with data @ 11 hr =33, and 1 exemption at 5.9 hr. This would provide 47.9 hrs for 10 registration actions with an average time per action being 4.8 hr. **The question in Table II** is then **how would you divide** the 4.8 hr (**4.2 hr in the chart) between the various steps** in collection action such as read instructions, prepare submission etc.

- Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with CRP, e.g., the document does not include

estimated burden hours and costs for conducting studies. If you provide burden estimates substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

Table I
(Average estimated industry burden per response type)

Type of Response	**No. of Responses**	**Technical Burden**	**Clerical Burden**	**Total Hours per Event**
		Hours Per Event	**Hours Per Event**	
CRP certification	798	1.0	0.5	1.5
CRP certification with data	296	8.0	3.0	11.0
Exempt from CRP due to large package size	34	1.0	0.0	1.0
Exempt from CRP due to lack of toxicity, packaging, no residential use, lower product toxicity	37	8.0	3.0	11.0

Table II
(Distribution of Burden among various activities.
Based on projection Total Burden 4.2 Hrs/Respondent Action)

COLLECTION ACTIVITIES	**Burden Hours**		**TOTAL**	
	Tech. $60.39/hr.	**Clerical $35.89/hr.**	**Burden Hours**	**Cost**
Read instructions	0.18	0.00	0.18	$10.57
Plan activities	0.22	0.00	0.22	$13.29
Create information including electronic format of data	1.20	0.00	1.20	$72.47
Process, compile, and complete written compliance document	1.10	0.90	1.90	$98.73
Review submission	0.30	0.00	0.40	$18.12
Store, submit, file, or maintain data	0.00	0.30	0.30	$10.77
TOTAL	3.00	1.20	4.20	$223.94

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- Completed by:
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EPA Questions asked in Consultation

(1) Publicly Available Data

$ Is the Child-Resistant Packaging (CRP) data that the Agency seeks for your product(s) available from any public source, or already collected by another office at EPA or by another agency? No

$ If yes, where can you find the CRP data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they are not specific to your package/bait station?)

(2) Frequency of Collection

$ Is submitting CRP certification with/without data when a change in packaging occurs too frequent? No

(3) Clarity of Instructions

$ CRP regulations require respondents provide CRP certifications, CRP test data, and CRP exemption requests to ensure that the Agency can ascertain if CRP is protecting children from serious illness or injury resulting from handling, using, or ingesting certain products.

$ Based on the regulations, PR Notices, CRP webpage, etc., is it clear what type of CRP information you are required to submit (e.g. CRP certification with/without data, etc.) and how to submit such data? If not, what suggestions do you have to clarify the instructions? It would be helpful if EPA maintained a list of packages/closures for which data has been reviewed and accepted. This would allow registrants to know that data not required when certification submitted for

these packages/closures. Appendix A of PR Notice 97-9 should be updated to include Microsoft Excel files (xlsx) as acceptable format.

$ Do you understand that you are required to maintain CRP records for the life of the pesticide product registration? Yes

$ There are no forms associated with CRP. Is the submission format for CRP certifications and/or CRP data, clear, logical, and easy to complete? CRP certification – guidance acceptable. CRP data – It would be helpful to have an electronic template of fields with sample data for guidance.

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

$ Currently CRP data may be submitted electronically in addition to a hard copy to expedited data analysis. What do you think about this option? Other electronic reporting alternatives include the use of Aweb forms@/XML based submissions via the Agency=s Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc. No experience with electronic submission to provide comment.

$ Are you keeping your records electronically? No If yes, in what format?

(5) Burden and Costs

- Are the clerical and technical burden hours in the 2 tables below accurate? These figures are based on 2013 projections. **Table I** associates the various types of CRP actions a respondent may do and the number of technical hours and clerical hours per event. Please note this table reflects 2010 comments regarding burden hours per CRP action. Please remember this burden may cover more than one product registration. **Table II** spreads out a 4.2 hour burden per action in 0.1 hour increments. This not the time for self-certification without data or any other specific CRP type action. This is the time average based on registration actions spread out over self certification, certification with data, exemptions, etc. The time per action multiplied by the number of actions, and the sum of all registration actions time spent divided by the number of actions. **For example** using burden estimates say 10 registration actions with say 6 being self certifications @1.5 hr =9, 3 certification with data @ 11 hr =33, and 1 exemption at 5.9 hr. This would provide 47.9 hrs for 10 registration actions with an average time per action being 4.8 hr. **The question in Table II** is then **how would you divide** the 4.8 hr (**4.2 hr in the chart) between the various steps** in collection action such as read instructions, prepare submission etc.

- Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with CRP, e.g., the document does not include

estimated burden hours and costs for conducting studies. If you provide burden estimates substantially different from EPA's, please provide an explanation of how you arrived at your estimates.

Table I
(Average estimated industry burden per response type)

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Review submission	0.30	0.00	0.40	$18.12
Store, submit, file, or maintain data	0.00	0.30	0.30	$10.77
TOTAL	3.00	1.20	4.20	$223.94

Annual Respondent Burden by Response Type

Type of Response	No. of Responses	Technical Burden		Clerical Burden		Aggregate Burden
		Hours Per Event	Total	Hours Per Event	Total	
CRP certification	13	2	26			
CRP certification with data	3	6	18			
Exempt from CRP due to large package size	0					
Exempt from CRP due to lack of toxicity, packaging, no residential use, lower product toxicity	0					
TOTAL	16		44			

Annual Respondent Burden/ Cost Estimates

COLLECTION ACTIVITIES	Burden Hours		TOTAL	
	Tech. $60.39/hr.	Clerical $35.89/hr.	Burden Hours	Cost
Read instructions	0.2	0.00	0.2	
Plan activities	0.2	0.00	0.2	
Create information including electronic format of data	0.9	0.00	0.9	
Process, compile, and complete written compliance document	1.0	0	1.0	
Review submission	0.3	0	0.3	
Store, submit, file, or maintain data	0.2	0	0.2	
TOTAL	2.8	0	2.8	

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- Complete by:

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EPA Questions asked in Consultation

(1) Publicly Available Data

$ Is the Child-Resistant Packaging (CRP) data that the Agency seeks for your product(s) available from any public source, or already collected by another office at EPA or by another agency?
Response: Our sources of information are the catalogs/ publications/literature provided by the packaging suppliers. The format of this information may be written documents or may be presented on the company's websites.

$ If yes, where can you find the CRP data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they are not specific to your package/bait station?)
Response: As a registrant, we obtain our Child Resistant Packaging (CRP) information from the representative of the packaging supplier or from the supplier's websites.

(2) Frequency of Collection

$ Is submitting CRP certification with/without data when a change in packaging occurs too frequent?
Response: Our current residential product lineup is narrow, our products are substantially similar to existing products, most of our individual products do not meet the toxicity criteria defined in 40 CFR Part 157, and our packaging is described as rigid, non-refillable plastic containers with standardized closures. So, we believe that providing this information to the Agency for these types of

household products at the time of registration and/or registration review is adequate and additional or new certifications should not be needed.
Our current products for occupational users are substantially similar to existing products and within the scope of the Child Resistant Packaging requirements. Again, our CRP packaging is described as rigid, non-refillable plastic containers with standardized closures. We submit certification statements for each registration that the container design and closures meet the CRP requirements when the product is distributed and sold. Unless there is good cause such as a change in the formulation or a change in the packaging, then additional or new certifications for packaging are unnecessary.

(3) Clarity of Instructions

$ CRP regulations require respondents provide CRP certifications, CRP test data, and CRP exemption requests to ensure that the Agency can ascertain if CRP is protecting children from serious illness or injury resulting from handling, using, or ingesting certain products.

$ Based on the regulations, PR Notices, CRP webpage, etc., is it clear what type of CRP information you are required to submit (e.g. CRP certification with/without data, etc.) and how to submit such data? If not, what suggestions do you have to clarify the instructions?
Response: The information provided by the Agency is clear and accurate.

$ Do you understand that you are required to maintain CRP records for the life of the pesticide product registration?
Response: We understand record-keeping requirements as stated in 40 CFR Part 157.

$ There are no forms associated with CRP. Is the submission format for CRP certifications and/or CRP data, clear, logical, and easy to complete?
Response: We believe that a cover letter with a certification statement and the Application for Pesticide Amendment (EPA Form 8570-1) as described in Pesticide Registration Notice (PRN) 96-2 is adequate and offers the registrant more flexibility than a new form.

(4) Electronic Reporting and Record keeping

The Government Paperwork Elimination Act requires agencies make available to the public electronic reporting alternatives to paper-based submissions by 2003, unless there is a strong reason for not doing so. One such reason is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

$ Currently CRP data may be submitted electronically in addition to a hard copy to expedited data analysis. What do you think about this option? Other electronic reporting alternatives include the use of Aweb forms@/XML based submissions via the Agency=s Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc.

$ Are you keeping your records electronically? If yes, in what format?
Response: We currently keep all records in .pdf format, housed in a searchable database.

(5) Burden and Costs

- Are the clerical and technical burden hours in the 2 tables below accurate? These figures are based on 2013 projections. **Table I** associates the various types of CRP actions a respondent may do and the number of technical hours and clerical hours per event. Please note this table reflects 2010 comments regarding burden hours per CRP action. Please remember this burden may cover more than one product registration. **Table II** spreads out a 4.2 hour burden per action in 0.1 hour increments. This not the time for self-certification without data or any other specific CRP type action. This is the time average based on registration actions spread out over self certification, certification with data, exemptions, etc. The time per action multiplied by the number of actions, and the sum of all registration actions time spent divided by the number of actions. **For example** using burden estimates say 10 registration actions with say 6 being self certifications @1.5 hr =9, 3 certification with data @ 11 hr =33, and 1 exemption at 5.9 hr. This would provide 47.9 hrs for 10 registration actions with an average time per action being 4.8 hr. **The question in Table II** is then **how would you divide** the 4.8 hr (**4.2 hr in the chart) between the various steps** in collection action such as read instructions, prepare submission etc.

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