

EPA ICR No. 2261.03; OMB Control No. 2070-0171

ATTACHMENT C

**Copy of Consultations Message Sent by EPA to Potential Respondents and
Copy of Response to Consultations Message**

Emily Connor

From: Emily Connor
Sent: Wednesday, December 11, 2013 3:36 PM
To: [addressees]
Cc: 'difiore.david@epa.gov'
Subject: Request for feedback on DfE's Safer Detergents Stewardship Initiative
Attachments: EPA-HQ-OPPT-2012-0917-0002 Supporting Statement.pdf; EPA-HQ-OPPT-2012-0917-0003 Attachment A.pdf; EPA-HQ-OPPT-2012-0917-0004 Attachment B.pdf

[Salutation],

I'm writing from Abt Associates on behalf of the U.S. Environmental Protection Agency's Design for the Environment (DfE) Program. We're currently supporting DfE in conducting research on the burden associated with its Safer Detergents Stewardship Initiative (SDSI). The Paperwork Reduction Act requires that federal agencies re-evaluate every three years the recordkeeping and reporting burden associated with information collection requests of this nature.

As a potential respondent, we would value your feedback about the burden associated with SDSI to ensure that our estimates are reasonable. In this ICR renewal, there is no change in the number of hours in the total estimated respondent burden compared with that identified in the ICR currently approved by OMB.

Attached is a copy of the Information Collection Request (ICR) for SDSI (see the Supporting Statement and Attachments A and B). For your reference, here is a link to the federal register notice: <https://www.federalregister.gov/articles/2013/10/02/2013-23938/agency-information-collection-activities-proposed-collection-comment-request>

Please give particular attention to Section 6 of the ICR, which includes burden estimates associated with SDSI participation. When reviewing, please consider the following questions:

- (i) is the proposed collection of information necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility?;
- (ii) are the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, reasonable and accurate?;
- (iii) could the quality, utility, and clarity of the information to be collected be improved?

We would greatly appreciate your feedback on the above items and also value your suggestions for future improvements to SDSI. Please send me any comments or feedback by Friday, December 20th.

Thanks in advance for your

time and assistance! Sincerely,

Emily Connor

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**Comments of ISSA on the Subject of
Information Collection Activities Associated with the
EPA Design for the Environment (DfE)
Safer Detergent Stewardship Initiative (SDSI)
(Docket No. EPA-HQ-OPPT-2012-0917)**

**Submitted by
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January 31, 2014

I Introduction

ISSA greatly appreciates this opportunity to provide comments on specific aspects of the proposed information collection associated with the EPA Design for the Environment (DfE) Safer Detergent Stewardship Initiative (SDSI) (Docket No. EPA-HQ-OPPT-2012-0917).

ISSA is a non-profit trade association that represents the commercial cleaning industry. Our association represents over 6,000 companies worldwide, approximately 4,000 of which are located in the United States. Our membership consists of every segment of the cleaning industry including manufacturers and distributors of cleaning products as well as commercial cleaning service providers. In addition, our manufacturer membership includes well approximately 300 formulators of chemical based cleaning products, many of whom participate in the DfE Safer Product Labeling program.

ISSA applauds the EPA Design for the Environment for developing the SDSI program. Our association supports this initiative because we firmly believe that it will provide a strong incentive that will motivate and encourage companies that participate in the DfE program to promote more aggressively the use of cleaning products recognized by the DfE Safer Product Labeling Program, and thereby contribute significantly to reducing the impact of cleaning products to the environment.

The comments below are in response to the specific questions posed in the October 2, 2013 Federal Register Notice issued by EPA.

II Is the Proposed Collection of Information Necessary for the Proper Performance of the functions of the Agency and the Award Program?

ISSA has reviewed the SDSI application and believes that the information requested therein represents an appropriate balance between requesting information necessary to administer the SDSI program, while not unreasonably burdening individual organizations that wish to participate.

Aside from descriptive information, the SDSI application requests information tailored to elicit evidence of a company's full or intended transition to safer surfactants, such as strategies that will be implemented to ensure that only safer surfactants are use or purchased by specified dates, and other such supportive information including total use volume of surfactants.

ISSA believes that all of the aforementioned information requested in the SDSI application is essential and adequate for EPA to ascertain whether an applicant has met the necessary criteria to be recognized under the SDSI program.

III Accuracy of the Estimate of the Burdens Associated with the Proposed Collection of Information

In ISSA's opinion, EPA's estimate that the collection of information associated with the SDSI application will be an average of 10 hours is a reasonable one, and we concur with the Agency's extrapolations based on this average.

While ISSA did not have an opportunity to survey its membership on this specific subject, we did conduct a similar survey several years ago in conjunction with the first SDSI program that used a very similar application, which in turn requested comparable information.

In anticipation of the SDSI program, ISSA conducted a survey in 2007 of a focus group consisting of nine member companies representing a cross section of the cleaning industry (i.e., five formulator companies; two distributors; and two commercial cleaning service providers). Participating ISSA member companies were provided with the draft SDSI application and were queried about the potential burden associated with its completion.

The range in estimates provided by these companies ranged from a minimum of 4 hours to a maximum of 16 hours. The variation in estimates was generally reflective of the type of business, the size of the entity, the complexity of its operations, and whether or not it has already transitioned to safer surfactants.

Furthermore, ISSA anticipates that it will apply for the Award and has reviewed the application with this in mind. In this regard, ISSA estimates that it would take a total of 7 hours to complete the application for "Supporter" status as a trade association for the current SDSI program under consideration.

Based on this survey and the similarity between the original SDSI application and the current iteration, ISSA believes that EPA's estimate of the paperwork burden associated with completion of the application to be reasonable. Moreover, individual companies are free to decide on their own whether the benefits of participation in the SDSI program outweigh the information collection burden and other potential burdens associated with participating in the program.

IV Enhance the Quality, Utility and Clarity of the Information to be Collected

In general, ISSA has reviewed the Award application and believes it is well crafted to elicit the information necessary to effectively evaluate candidates for eligibility in the SDSI program. The application is clear in the information it solicits; it seeks information that is relevant to the goals of the SDSI program and EPA generally; and will provide EPA with the necessary foundation upon which to select deserving recipients.

V Suggestions to Minimize the Paperwork Burden

After thoroughly reviewing the application for the SDSI program, ISSA has no suggestions that would further minimize the paperwork burden. We believe that EPA has done all within reason to minimize the paperwork burden, while still eliciting information necessary for it to select deserving recipients of recognition under the SDSI program.

VI Award Program Generally

ISSA supports the SDSI program and applauds EPA for taking an innovative approach to achieving positive change in the marketplace.

In general, ISSA supports the use of voluntary initiatives that provide positive recognition to companies as an incentive to promote the development, proliferation and use of environmentally superior products. The SDSI program will incentivize companies to go above and beyond to contribute to a better environment. Moreover, such an approach provides industry with appropriate flexibility so that individual companies can weigh the benefits and costs of the initiative, and make a decision that best meets a company's particular approach to the marketplace.