Attachment D: Record of Consultations
This attachment is available as part of the electronic docket EPA-HQ-OPP-2013-0494 and is part of the ICR's Supporting Statement.

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Consultation Questionnaire for OPP ICR:
Plant-Incorporated Protectants; CBI Substantiation and Adverse Effects Reporting
OMB Control # 2070-0142)

A list of the consultation questions asked and the responses thereto become a part of the electronic public comment docket for this ICR renewal. Thus, a list of questions asked the respondents and the responses received, written comments, verbal responses or e-mail, etc. will become a part of the electronic public comment docket for this ICR renewal.

(1) Publicly Available Data

$ Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency?

Not to our knowledge

$ If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

$ Is the submission of CBI Substantiation Claims or Adverse Effects Reports too frequent?

Submission is required only as situations arise and is therefore not too frequent

(3) Clarity of Instructions

$ The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.

$ Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?

Requirements are clear

$ Do you understand that you are required to maintain records?

Yes

(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.

$ What do you think about electronic alternatives to paper-based records and data submissions? Would you be interested in pursuing electronic reporting?

Electronic submission, if secure and CBI maintained, using a simple and flexible format, and a simple process, would be acceptable.

$ Are you keeping your records electronically? If yes, in what format?
Yes

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

$ What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?
Reduced duplication of work, decreased administration associated with physical documents

(5) Burden and Costs

The following questions refer to Tables 1 and 2 in Section 6 of the ICR (see the Section 6 excerpt that is attached). Tables 1 and 2 provide EPA's estimate of the average respondent burden and cost estimates for Substantiation of CBI Claims and Adverse Effects Reporting, respectively

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$ The Agency assumes there is no capital cost associated with this activity. Is that correct? Correct

$ Bearing in mind that the burden and cost estimates include only burden hours and costs associated with the paperwork involved with this ICR, e.g., the ICR does not include estimated burden hours and costs for conducting studies, are the estimated burden hours and labor rates accurate? If you provide burden and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates. Burden and costs of reporting are minimal fiven the documentation requirements

$ Are there other costs that should be accounted for that may have been missed? No.