

Attachment E
Summary of Consultations

This attachment is available as part of the electronic **Docket EPA-HQ-OPP-2015-0231** and is part of the ICR's Supporting Statement

I. Companies Contacted:

1. Ms. Patsy Laird
Labeling Specialist, Regulatory Affairs
Syngenta Crop Protection
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2. Ms. Barbara Del Duke
Director of Public Affairs
FMC Corporation
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3. Mr. Steve Bale
Senior Logistics Manager
Melaleuka
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II. Request for Comment Sent to Companies Contacted:

Dear Exporter:

EPA is renewing its Information Collection Request (ICR) for Foreign Purchaser Acknowledgment Statements and we are required to ask companies with whom we are in contact concerning Foreign Purchase Acknowledgment Statements to let us know what sort of burden the requirement places on them.

EPA published the following notice in the Federal Register,

<https://www.federalregister.gov/articles/2015/05/08/2015-11212/agency-information-collection-activities-proposed-collection-comment-request#h-8>

announcing a 60-day public notice and comment period. In addition to the public notice that EPA published in the Federal Register concerning the renewal of this ICR, the Agency must consult with stakeholders who actively interact with the Agency through the use of this collection instrument, as required under 5 CFR 1320.8(d)(1). Would you

like to participate? If so please complete the survey questions below and return them to me within the next 21 days. Please contact me if you want to discuss the survey.

Following are five series of questions that we need responses to. There is no requirement for you to respond, but we would appreciate your assistance. If you have any questions about our request please contact me.

Regards,

Ron Kendall, Coordinator

Foreign Purchaser Acknowledgment Statements

OPP

III. Questions:

1) Publicly available Data

- a) Is the data that the Environmental Protection Agency seeks available from any public source, or already collected by another office at EPA or by another agency?
- b) If yes, where can you find the data?

2) Frequency of Collection

Can the Agency collect the information less frequently and still produce the same outcome?

3) Clarity of Instructions

- a) The ICR is intended to require that respondents provide certain data so that the Agency can use them.
 - i) Based on the instructions (regulations, Pesticide Registration [PR] Notices, etc.), is it clear what you are required to do and how to submit such data?
 - ii) If not, what suggestions do you have to clarify the instructions?
- b) Do you understand that you are required to maintain records?
- c) Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?
- d) Regarding any specific-program forms, do you use them? Are they clear, logical and easy to complete?

4) **Electronic Reporting and Recordkeeping**

The Government Paperwork Elimination Act requires that agencies make available to the public electronic reporting alternatives to paper-based submissions 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 Confidential Business Information (CBI) that might be transmitted over the Internet.

What do you think about electronic alternatives to paper-based records and data submissions? Current electronic-reporting alternatives include the use of “web forms”/XML-based submissions via the Agency’s Internet site and magnetic media-based submissions, e.g., diskette, CD-ROOM, etc. Would you be interested in pursuing electronic reporting? Are you keeping your records electronically? If yes, in what format?

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

- a) Would you be more inclined to submit CBI on diskette than on paper?
- b) What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

5) ***Burden and Costs (please see attached table below that shows our estimates about respondent burden and costs)**

- a) Are the labor rates accurate?
- b) The Agency assumes there are no capital costs associated with this activity. Is that correct?
- c) Bearing in mind that the burden and costs 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 the Agency’s, please provide and explain how you arrived at your estimates.

- d) Are there other costs that should be accounted for that may have been missed?

Respondent Burden by Information Collection (IC)

The total annual respondent burden hours for this ICR are estimated at 24,470 hours. This accounts for 2,420 hours for the FPAS requirement, 7,200 hours for the labeling of unregistered pesticides, and 14,850 hours for the labeling of registered pesticides.

The total annual respondent cost for this ICR is estimated to be \$1,461,658. This estimate is composed of the following costs: \$135,904 for the FPAS requirement,

\$454,180 for the labeling of unregistered pesticides, and \$871,574 for the labeling of registered pesticides

Total Annual Respondent Burden Hours and Cost

Information Collection	Responses Per Year	Burden Per Response (hours)	Annual Burden (hours)	Annual Cost (\$)
Foreign Purchaser Acknowledgment Statements	2,283	1.06	2,420	\$135,904
Labeling for Unregistered Exported Pesticide Products	900	8	7,200	454,181
Multilingual Product Labeling for Registered Exported Pesticide Products	2,700	5.5	14,850	\$871,574
Total Annual Respondent Burden			24,470	1,461,658

¹ Totals may not sum due to rounding.

IV. Responses:

EPA received no responses to its request for comments on the ICR and the burden for this information collection.