

## Attachment C

### Summary of Consultations for the Renewal ICR, entitled " Foreign Purchaser Acknowledgment Statement of Unregistered Pesticides (Renewal)"

OMB Control No. 2070-0027; EPA ICR No. 0161.14; Docket No. EPA-HQ-OPP-2018-0266

#### A. Representatives contacted from the following Industries:

- Syngenta Crop Protection LLC
- International Trade Compliance
  
- Neogen
  
- FMC Corporation
  
- Suterra LLC
  
- MGK
  
- Marketing Arm International
  
- Monsanto Company
  
- Wellmark International

#### B. Questions and Responses:

EPA provided the same set of questions to each representative for their consideration and feedback. EPA received responses from the following two representatives:

- Marketing Arm International
- An anonymous submission to the public docket (Docket No. [EPA-HQ-OPP-2018-0266-0008](#))

The questions asked, and their feedback to those questions, are provided below:

#### *Responses from Mr. Jose Lopez, President of Marketing Arm International*

##### (1) **Publicly Available Data**

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

YES

- b) **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?)**

EACH TIME (12 TIMES A YEAR) OUR EPA ESTABLISHMENT WILL IMPORT RAW MATERIAL TO RE-EXPORT AS UNREGISTERED PRODUCT, WE HAVE TO SUPPLY TO THE EPA AGENCY IN ATLANTA:

- a. EPA NOTICE OF ARRIVAL.
- b. BOL AND SHIPPING DOCS....PLUS...
- c. A COPY OF THE ALL FPAS (ALREADY SUBMITTED TO US-EPA IN WASHINGTON).
- d. COPY OF IMPORT LABELS
- e. COPY OF EXPORT LABEL FOR EACH PRODUCT EXPORTED.

**(2) Frequency of Collection**

- a) **Can the Agency collect the information less frequently and still produce the same outcome?**

IN THE PAST..... ONLY EPA NOTICE OF ARRIVAL AND SHIPPING DOCS (BOL, INVOICE, ETC.)

**(3) Clarity of Instructions**

- a) **The ICR is intended to require that respondents provide certain data so that the Agency can utilize them.**
- b) **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?**

YES

- c) **Do you understand that you are required to maintain records?**

YES

- d) **Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?**

NO

- e) **Regarding the Voluntary Incident Reporting Forms, do you use them? Are they clear, logical, and easy to complete?**

NO

**(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. The U.S. E.P.A. Office of Pesticide Programs has a program for electronic study submissions, and is currently developing plans for systems to support electronic incident reporting. The Agency is also concerned to protect FIFRA CBI as well as personal information.

a) **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-ROM, etc. Would you be interested in pursuing electronic reporting? Are you keeping your records electronically? If yes, in what format?**

1) **Would you be more inclined to submit CBI on diskette, CD, or DVD, or via web rather than on paper?**

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2) **What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?**

NONE

(5) **Burden and Costs**

a) **Are the labor rates accurate?**

YES

b) **The Agency assumes there is no capital cost associated with this activity. Is that correct?**

YES

c) **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.**

NA

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

NA

*Anonymous comments submitted through the docket ([EPA-HQ-OPP-2018-0266-0008](#))*

(2) **Frequency of Collection**

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

Yes, I think it could be more beneficial and efficient for everyone if the Agency would accept collections quarterly.

**(3) Clarity of Instructions**

**b) 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?**

Yes

**c) Do you understand that you are required to maintain records?**

Yes

**d) Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?**

No, but our company created our own clear, logical template that includes all of the required data. However, it could be nice if there was a standard submission format issued by the EPA.

**(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. The U.S. E.P.A. Office of Pesticide Programs has a program for electronic study submissions, and is currently developing plans for systems to support electronic incident reporting. The Agency is also concerned to protect FIFRA CBI as well as personal information.

**a) 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-ROM, etc. Would you be interested in pursuing electronic reporting? Are you keeping your records electronically? If yes, in what format?**

I think electronic alternatives to paper-based records and data submissions are a great idea. Yes, I would be interested in pursuing electronic reporting. Yes, we keep our records electronically and stored as PDFs within files.

**1) Would you be more inclined to submit CBI on diskette, CD, or DVD, or via web rather than on paper?**

I would be more inclined to submit CBI via web rather than on paper, diskette, CD, or DVD.

**2) What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?**

I think there would be cost reductions (postage/mail/paper/ink) and greater efficiency in submitting if electronic submissions via the web were an option.