

SUPPORTING STATEMENT Part A

ARMS II and Fruit Chemical Use Survey

Substantive Change

OMB No. 0535-0218

This substantive change is being submitted as a supplemental supporting statement to the List Sampling Frame Survey.

A. JUSTIFICATION

1. Circumstances making collection of information necessary.

NASS is requesting a substantive change to the ARMS and Chemical Use Survey docket (0535-0218) to accommodate changes to several of the questionnaires.

NASS was approached by the Office of Pest Management Policy (OPMP) through a cooperative agreement to make changes to the ARMS II and Fruit Chemical Use surveys for 2019.

The OPMP was created by the Agricultural Research, Extension, and Education Reform Act of 1998 in response to grower concerns about the implementation of the Food Quality Protection Act of 1996 (FQPA). By 1998 statute, and as reauthorized in the Agricultural Act of 2014 (P.L. 113-79), OPMP “shall be responsible for

- the development and coordination of Department policy on pest management and pesticides;
- the coordination of activities and services of the Department, including research, extension, and education activities, regarding the development, availability, and use of economically and environmentally sound pest management tools and practices;
- assisting other agencies of the Department in fulfilling their responsibilities related to pest management or pesticides under the Food Quality Protection Act of 1996, the Federal Food, Drug and Cosmetic Act and other applicable laws;
- perform other functions as required by law or by request of the Secretary;
- ensure coordination of interagency activities with EPA and FDA and other Federal and state agencies; and

- consult with agricultural producers that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies.”

The additional questions that will be added to the questionnaires will address the following topics:

- Growers practices used to reduce off-field pesticide drift,
- Growers participation in programs to manage pesticide drift,
- Grower decisions regarding application methods, nozzle choices, and spray tank management,
- Sources of information growers are using to inform their pest resistance management decisions,
- Grower practices employed to manage pesticide resistance,
- Grower Best Management Practices (BMPs) to prevent pesticide exposure to pollinators,
- Grower awareness of BMPs to prevent pesticide exposure to pollinators.

2. How, by whom, and for what purpose information is to be used.

OPMP will be able to use the expanded NASS data to better fulfil their responsibilities listed above.

3. Use of improved information technology.

The ARMS II and Fruit Chemical Use Surveys are done by field enumeration. These changes to the questionnaires will not change anything as far use of technology.

4. Efforts to identify duplication.

There are no changes from the original approval related to duplication reduction.

5. Methods to minimize burden of small businesses.

NASS incorporated additional screening questions and skip patterns to help minimize additional burden as much as possible.

6. Consequence if information collection were less frequent.

There are no changes to the frequency of these surveys than was originally approved.

7. Special circumstances.

No special circumstances are associated with this information collection.

8. Federal register notice and consultation with outside persons.

Not applicable.

9. Payments or gifts to respondents.

No payments or gifts will be given to respondents.

10. Confidentiality provided to respondents.

Confidentiality will be provided to respondents in accordance with the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002. All confidentiality protections that are applied to all products released from these surveys will remain the same as originally approved.

11. Questions of a sensitive nature.

No questions of sensitive nature will be asked.

12. Hour burden and annualized costs to respondents.

The following table contains the estimated burden hours for the surveys included in this supplemental supporting statement. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. The adjusted overall cost to the public is estimated at \$3,896,714.16.

| | Burden Hours | Estimated Hourly Rate \$ | Total Cost \$ |
|--|--------------|--------------------------|-----------------|
| Original burden hours for total docket | 105,615 | \$ 36.84 | \$ 3,890,856.60 |
| Increase in burden hours for changes | 159 | \$ 36.84 | \$ 5,857.56 |
| Revised burden hours for total docket | 105,774 | \$ 36.84 | \$ 3,896,714.16 |

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 29, 2019 for the previous May) to estimate an hourly wage for the burden cost. The May 2018 mean wage for bookkeepers was \$20.25. The mean wage for farm managers was \$38.43. The mean wage for farm supervisors was \$24.42. The mean wage of the three is \$27.70. To

calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.84 per hour.

Original Burden Tables

| Respondent Burden for ARMS and Chemical Use Surveys for July 2018 - June 2021 1/ | | | | | | | | | | | | |
|--|---|----------------|--------------------------|----------------|----------------|-------------|---------------|----------------|----------------|-------------|--------------|--------------------|
| Survey Year | Survey | Sample Size 5/ | Waves of Data Collection | Responses | | | | Non-response | | | | Total Burden Hours |
| | | | | Resp. Count | Waves X Count | Min./ Resp. | Burden Hours | Nonresp Count | Waves X Count | Min./ Nonr. | Burden Hours | |
| Agricultural Resource Management Surveys (ARMS) Phases I, II, & III | | | | | | | | | | | | |
| 2018 | Integrated Screening Survey (Phase I) (Mail)1/ 4/ | - | 1 | - | - | 15 | - | - | - | 2 | - | - |
| | ARMS Screening Survey (Phase I) (Enumeration) 6/ | - | 1 | - | - | 15 | - | - | - | 2 | - | - |
| | Production Practices Report (Phase II) 2/ | 7,500 | 1 | 6,000 | 6,000 | 35 | 3,500 | 1,500 | 1,500 | 2 | 50 | 3,550 |
| | Production Practices & Costs Report (Phase II) 2/ | 5,000 | 1 | 4,000 | 4,000 | 65 | 4,333 | 1,000 | 1,000 | 2 | 33 | 4,366 |
| | Costs & Returns Report Report (Phase III) (Mail) 3/ | - | 1 | - | - | 100 | - | - | - | 2 | - | - |
| | Costs & Returns Report Report (Phase III) (Enumeration) 3/ | - | 1 | - | - | 100 | - | - | - | 2 | - | - |
| 2018 Total | | 12,500 | | 10,000 | 10,000 | | 7,833 | 2,500 | 2,500 | | 83 | 7,916 |
| 2019 | Integrated Screening Survey (Phase I) (Mail)1/ 4/ | 100,000 | 1 | 20,000 | 20,000 | 15 | 5,000 | 80,000 | 80,000 | 2 | 2,667 | 7,667 |
| | ARMS Screening Survey (Phase I) (Enumeration) 6/ | 80,000 | 1 | 60,000 | 60,000 | 15 | 15,000 | 20,000 | 20,000 | 2 | 667 | 15,667 |
| | Production Practices Report (Phase II) 2/ | 7,500 | 1 | 6,000 | 6,000 | 35 | 3,500 | 1,500 | 1,500 | 2 | 50 | 3,550 |
| | Production Practices & Costs Report (Phase II) 2/ | 5,000 | 1 | 4,000 | 4,000 | 65 | 4,333 | 1,000 | 1,000 | 2 | 33 | 4,366 |
| | Costs & Returns Report Report (Phase III) (Mail) 3/ | 35,000 | 1 | 7,000 | 7,000 | 100 | 11,667 | 28,000 | 28,000 | 2 | 933 | 12,600 |
| | Costs & Returns Report Report (Phase III) (Enumeration) 3/ | 30,000 | 1 | 22,500 | 22,500 | 100 | 37,500 | 7,500 | 7,500 | 2 | 250 | 37,750 |
| 2019 Total | | 100,000 | | 119,500 | 119,500 | | 77,000 | 138,000 | 138,000 | | 4,600 | 81,600 |
| 2020 | ARMS Screening Survey (Phase I) (Mail) 1/ | 110,000 | 1 | 22,000 | 22,000 | 15 | 5,500 | 88,000 | 88,000 | 2 | 2,933 | 8,433 |
| | ARMS Screening Survey (Phase I) (Enumeration) 6/ | 88,000 | 1 | 66,000 | 66,000 | 15 | 16,500 | 22,000 | 22,000 | 2 | 733 | 17,233 |
| | Production Practices Report (Phase II) 2/ | 7,500 | 1 | 6,000 | 6,000 | 35 | 3,500 | 1,500 | 1,500 | 2 | 50 | 3,550 |
| | Production Practices & Costs Report (Phase II) 2/ | 5,000 | 1 | 4,000 | 4,000 | 65 | 4,333 | 1,000 | 1,000 | 2 | 33 | 4,366 |
| | Costs & Returns Report (Phase III) (Mail) 3/ | 35,000 | 1 | 8,750 | 8,750 | 100 | 14,583 | 26,250 | 26,250 | 2 | 875 | 15,458 |
| | Costs & Returns Report (Phase III) (Enumeration) 3/ | 30,000 | 1 | 22,200 | 22,200 | 100 | 37,000 | 7,800 | 7,800 | 2 | 260 | 37,260 |
| 2020 Total | | 110,000 | | 128,950 | 128,950 | | 81,416 | 146,550 | 146,550 | | 4,884 | 86,300 |
| 2021 | Integrated Screening Survey (Phase I) (Mail)1/ 4/ | 100,000 | 1 | 20,000 | 20,000 | 15 | 5,000 | 80,000 | 80,000 | 2 | 2,667 | 7,667 |
| | ARMS Screening Survey (Phase I) (Enumeration) 6/ | 80,000 | 1 | 60,000 | 60,000 | 15 | 15,000 | 20,000 | 20,000 | 2 | 667 | 15,667 |
| | Production Practices Report (Phase II) 2/ | - | 1 | - | - | 35 | - | - | - | 2 | - | - |
| | Production Practices & Costs Report (Phase II) 2/ | - | 1 | - | - | 65 | - | - | - | 2 | - | - |
| | Costs & Returns Report (Phase III) (Mail) 3/ | 35,000 | 1 | 7,000 | 7,000 | 100 | 11,667 | 28,000 | 28,000 | 2 | 933 | 12,600 |
| | Costs & Returns Report (Phase III) (Enumeration) 3/ | 30,000 | 1 | 22,500 | 22,500 | 100 | 37,500 | 7,500 | 7,500 | 2 | 250 | 37,750 |
| 2021 Total | | 100,000 | | 109,500 | 109,500 | | 69,167 | 135,500 | 135,500 | | 4,517 | 73,684 |
| Cognitive Testing | | | | | | | | | | | | |
| 3 years | Testing approximately 50 ARMS and/or Chemical Use questionnaires per year | 50 | 1 | 50 | 50 | 90 | 75 | - | - | | - | 75 |

1/ ARMS and Chemical Use surveys are conducted on a cyclical basis that does not follow a calendar year, but instead follows the crop production year. The ARMS phase 1 is conducted in the Spring and early Summer for that crop year. The ARMS II and Chemical Use Surveys are conducted in the Autumn for the current production cycle. The ARMS III is conducted the following year for the previous years expenses and income for both whole farm and commodity specific data.

2/ Phase II surveys are all conducted as face to face interviews. Field enumerators can copy much of the chemical use data from the farm operator's record books. The remainder of the data can be obtained directly from the farm operator. The chemical data is related to a specific field selected of each farm sampled for this survey.

3/ All Phase III questionnaires will be attempted by mail with phone and field enumeration for non-respondents. In 2017 respondents have the option of completing the ARMS III questionnaire and not having to complete the Census of Agriculture. The ARMS III questionnaire contains the same essential questions as the Census.

4/ In 2016 and 2018 the ARMS Phase I Screener will also be used to pre-screen for the Vegetable Chemical Use Survey.

5/ The ARMS Phases II & III are both subsampled from the Phase I Screening Survey.

6/ Phase I is available by internet, mail, phone and face to face enumeration. The questionnaires are mailed out with pre-survey letter and internet instructions. Historically we have received approximately a 20% response rate by mail and EDR combined. This is followed by phone and personal enumeration for non-respondents.

0535-0218 - Projected Respondent Burden for EPAs in 2018 - 2020

(External Project Agreement "EPA" are surveys that NASS conducts under cooperative agreements with State agencies.)

| State | Commodity | Sector | Survey Name | Sample Size | Waves of Data Collection | Resp. Count | Waves X Count | Min. / Resp | Burden Hours | Non-Resp Count | Waves X Count | Min / Non Resp. | Burden Hours | Total Burden Hours |
|-------------|----------------------------|-----------------------|--|-------------|--------------------------|-------------|---------------|-------------|--------------|----------------|---------------|-----------------|--------------|--------------------|
| Mississippi | All (crops) | Growers | Screener | 1,350 | 1 | 473 | 473 | 15 | 118 | 878 | 878 | 2 | 29 | 147 |
| Mississippi | Wheat | Growers | Cropping Practices - Wheat | 70 | 1 | 56 | 56 | 90 | 84 | 14 | 14 | 2 | 0 | 84 |
| Mississippi | Corn | Growers | Cropping Practices - Corn | 115 | 1 | 92 | 92 | 90 | 138 | 23 | 23 | 2 | 1 | 139 |
| Mississippi | Rice | Growers | Cropping Practices - Rice | 40 | 1 | 32 | 32 | 90 | 48 | 8 | 8 | 2 | 0 | 48 |
| Mississippi | Cotton | Growers | Cropping Practices - Cotton | 90 | 1 | 72 | 72 | 90 | 108 | 18 | 18 | 2 | 1 | 109 |
| Mississippi | Soybeans | Growers | Cropping Practices - Soybeans | 115 | 1 | 92 | 92 | 90 | 138 | 23 | 23 | 2 | 1 | 139 |
| Minnesota | Corn, Soybeans, Wheat, Hay | Growers | Pesticide & Fertilizer Use in Minnesota | 8,400 | 1 | 6,720 | 6,720 | 30 | 3,360 | 1,680 | 1,680 | 2 | 56 | 3,416 |
| Maryland | All | Pesticide Applicators | Maryland Pesticide Usage Survey (Mail) | 6,800 | 1 | 2,040 | 2,040 | 45 | 1,530 | 4,760 | 4,760 | 2 | 159 | 1,689 |
| | | | Maryland Pesticide Usage Survey (Phone Follow-Up) | 4,760 | 1 | 3,332 | 3,332 | 45 | 2,499 | 1,428 | 1,428 | 2 | 48 | 2,547 |
| Illinois | Cultural Practices | Crops | Nutrient Loss Reduction Strategy (1st Mailing) | 1,900 | 1 | 570 | 570 | 25 | 238 | 1,330 | 1,330 | 2 | 44 | 282 |
| | | | Nutrient Loss Reduction Strategy, (2nd Mailing) | 1,330 | 1 | 200 | 200 | 25 | 83 | 1,131 | 1,131 | 2 | 38 | 121 |
| | | | Nutrient Loss Reduction Strategy (Phone Follow-Up) | 1,131 | 1 | 678 | 678 | 25 | 283 | 452 | 452 | 2 | 15 | 298 |

Publicity Materials ¹

| | | | | | | | | | | | |
|---|--------|---|--------|--------|---|-------|-------|-------|---|-----|-------|
| Cover Letter and/or EDR Instruction Sheet | 18,880 | 1 | 14,356 | 14,356 | 5 | 1,196 | 4,524 | 4,524 | 2 | 151 | 1,347 |
|---|--------|---|--------|--------|---|-------|-------|-------|---|-----|-------|

Cognitive Testing

| | | | | | | | | | | | |
|-----------------------|----|---|----|----|-----|----|---|---|---|---|----|
| Questionnaire Testing | 30 | 1 | 30 | 30 | 120 | 60 | 0 | 0 | 2 | 0 | 60 |
|-----------------------|----|---|----|----|-----|----|---|---|---|---|----|

| | | | | | | | | | | | |
|---------------|---------------|--|---------------|---------------|--|--------------|--------------|---------------|--|------------|---------------|
| TOTALS | 18,910 | | 14,386 | 14,386 | | 9,883 | 4,524 | 11,744 | | 543 | 10,426 |
|---------------|---------------|--|---------------|---------------|--|--------------|--------------|---------------|--|------------|---------------|

¹ The publicity materials for these reimbursable surveys is not included in the publicity materials on the third page. That number is for the Federally Funded surveys only.

| Respondent Burden for ARMS and Chemical Use Surveys for July 2018 - June 2021 1/ | | | | | | | | | | | | |
|---|--|-------------|--------------------------|-------------|---------------|-------------|--------------|---------------|---------------|-------------|--------------|--------------------|
| Survey Year | Survey | Sample Size | Waves of Data Collection | Responses | | | | Non-response | | | | Total Burden Hours |
| | | | | Resp. Count | Waves X Count | Min./ Resp. | Burden Hours | Nonresp Count | Waves X Count | Min./ Nonr. | Burden Hours | |
| Contractor Expense Survey 3/ | | | | | | | | | | | | |
| 2019 | Contractor Expense Survey | 100 | 1 | 80 | 80 | 45 | 60 | 20 | 20 | 2 | 1 | 61 |
| 2020 | Contractor Expense Survey | 100 | 1 | 80 | 80 | 45 | 60 | 20 | 20 | 2 | 1 | 61 |
| 2021 | Contractor Expense Survey | 100 | 1 | 80 | 80 | 45 | 60 | 20 | 20 | 2 | 1 | 61 |
| Total | | 300 | | 240 | 240 | | 180 | 60 | 60 | | 3 | 183 |
| Chemical Use Surveys - NASS Program Only | | | | | | | | | | | | |
| 2018 | Vegetable Chem Use | 4,200 | 1 | 3,360 | 3,360 | 45 | 2,520 | 840 | 840 | 2 | 28 | 2,548 |
| 2019 | Fruit Chem Use | 6,700 | 1 | 5,360 | 5,360 | 45 | 4,020 | 1,340 | 1,340 | 2 | 45 | 4,065 |
| 2020 | Vegetable Chem Use | 4,200 | 1 | 3,360 | 3,360 | 45 | 2,520 | 840 | 840 | 2 | 28 | 2,548 |
| Total | | 15,100 | | 12,080 | 12,080 | | 9,060 | 3,020 | 3,020 | | 101 | 9,161 |
| Microbial Food Safety Practices -- Packer Survey | | | | | | | | | | | | |
| Discontinued | Microbial Food Safety Practices -- Packer Survey | - | 1 | - | - | 30 | - | - | - | 2 | - | - |
| Total | | - | | - | - | | - | - | - | | - | - |
| Publicity Materials for ALL surveys 2/ | | | | | | | | | | | | |
| 2018 | All materials for all versions 4/ | 16,700 | 1 | 13,360 | 13,360 | 5 | 1,113 | 3,340 | 3,340 | 2 | 111 | 1,224 |
| 2019 | All materials for all versions | 123,500 | 1 | 98,800 | 98,800 | 5 | 8,233 | 24,700 | 24,700 | 2 | 823 | 9,056 |
| 2020 | All materials for all versions | 115,800 | 1 | 92,640 | 92,640 | 5 | 7,720 | 23,160 | 23,160 | 2 | 772 | 8,492 |
| 2021 | All materials for all versions | 100,250 | 1 | 80,200 | 80,200 | 5 | 6,683 | 20,050 | 20,050 | 2 | 668 | 7,351 |
| Total | | 356,250 | | 285,000 | 285,000 | | 23,749 | 71,250 | 71,250 | | 2,374 | 26,123 |
| Quality Control Survey (Telephone Only) - Recontact operators to verify quality of NASDA enumerators. 4/ | | | | | | | | | | | | |
| 2019 | Quality Control Worksheet (phone only) | 1,500 | 1 | 1,500 | 1,500 | 5 | 125 | - | - | | - | 125 |
| 2020 | Quality Control Worksheet (phone only) | 1,500 | 1 | 1,500 | 1,500 | 5 | 125 | - | - | | - | 125 |
| 2021 | Quality Control Worksheet (phone only) | 1,500 | 1 | 1,500 | 1,500 | 5 | 125 | - | - | | - | 125 |
| Total | | 4,500 | | 4,500 | 4,500 | | 375 | | | | - | 375 |
| Annual Totals 2/ | | | | | | | | | | | | |
| 2018 | Annual Totals 4/ | 35,660 | 1 | 27,796 | 27,796 | | 21,349 | 7,864 | 15,924 | | 765 | 22,114 |
| 2019 | Annual Totals | 125,760 | 1 | 100,618 | 140,876 | | 99,396 | 25,142 | 150,604 | | 6,012 | 105,408 |
| 2020 | Annual Totals | 133,260 | 1 | 106,618 | 148,326 | | 101,799 | 26,642 | 159,154 | | 6,228 | 108,027 |
| 2021 | Annual Totals | 100,150 | 1 | 80,120 | 111,130 | | 76,110 | 20,030 | 135,520 | | 5,186 | 81,296 |
| Annual Averages | | 131,610 | | 105,051 | 142,710 | | 99,551 | 26,559 | 153,734 | | 6,064 | 105,615 |
| Average Burden per Respondent per Year | | 0.80248461 | | | 1.35848255 | | 0.6975755 | | 5.78840 | | 0.03944 | |

1/ ARMS and Chemical Use surveys are conducted on a cyclical basis that does not follow a calendar year, but instead follows the crop production year. The ARMS phase 1 is conducted in the Spring and early Summer for that crop year. The ARMS II and Chemical Use Surveys are conducted in the Autumn for the current production cycle. The ARMS III is conducted the following year for the previous years expenses and income for both whole farm and commodity specific data.

2/ For annual totals the sample size does not include the counts from the publicity materials, since it is the same operators. However, the burden counts do include the burden associated with the publicity materials. The surveys that are attempted by mail will have the publicity materials included with the initial mailing. No publicity materials are sent out with the Contractor Expense Surveys.

3/ Contractor Expense Survey is conducted to collect and summarize the amount of farm input provided by contractors. This data is summarized and used to complete surveys when the farm operator cannot provide the contractor inputs for their farming operation.

4/ Publicity materials are not sent out to sampled operations that were contacted for a quality control survey.

Revisions

Adjustments to Total Burden for 2019 Chemical Use Surveys

| | Approved Sample Size | Revised Sample Size | Difference | Approved Burden Minutes per Questionnaire | Revised Burden Minutes per Questionnaire | Difference |
|--|----------------------|---------------------|------------|---|--|------------|
| | | | | | | |

13. Total annual cost burden to respondents.

No start-up or ongoing operation/maintenance costs are associated with this information collection.

14. Annualized costs to federal government.

OPMP provided NASS with \$940,000 to cover the costs associated with these changes.

15. Reasons for changes in burden.

OPMP came to NASS wanting to incorporate additional pest management questions into the ARMS II Production Practices Reports. The PPR surveys for 2019 will be for winter, spring and durum wheat questionnaires, the new questions will be in Section E, Pest Management Practices, questions number 17 – 29. In addition, OPMP requested that similar pest management questions be added to the Fruit Chemical Use Survey which will also be conducted in 2019. The PPR and the fruit questionnaires are already approved to collect data that is related to Pest Management; OPMP needs additional detail to be included in the 2019 questionnaires. The PPR respondent burden was increased from 35 minutes per completed response to 50 minutes and for the Fruit Chemical Use Survey, the respondent burden was increased from 50 minutes to 60 minutes. However the overall sample size was reduced by 1,200. The net change in annual respondent burden is reflected in the table below.

The ARMS II Production Practices and Costs Reports (PPCR) will target the commodities of barley, cotton and sorghum in 2019. NASS conducts these surveys under a cooperative agreement with the USDA Economic Research Service (ERS). Each year, ERS adds or adjusts the questions to accommodate data needs either for research purposes or regulatory guidelines. In 2019, at the request of ERS, several changes have been made to the PPCR questionnaires for barley, sorghum, and cotton. The questions are tested questions that were previously asked on either the soybean or corn PPCR versions. Based on completion times for the corn and soybean PPCR surveys, the added questions and skip patterns are incorporated into the 2019 questionnaires; we are not expecting any increase in respondent burden per completed questionnaire.

| Adjustments to Total Burden for 2019 Chemical Use Surveys | | | | | | |
|---|----------------------|---------------------|------------|---|--|------------|
| | Approved Sample Size | Revised Sample Size | Difference | Approved Burden Minutes per Questionnaire | Revised Burden Minutes per Questionnaire | Difference |
| Production Practices & Cost Report (ARMS II) | 5,000 | 5,300 | 300 | 65 | 65 | - |
| Commodities (Cotton, Barley, and Sorghum) | | | | | | |
| Production Practices Report (ARMS II) | 7,500 | 3,600 | (3,900) | 35 | 50 | 15 |
| Commodities (Winter Wheat, Spring Wheat and Durum Wheat) | | | | | | |
| Fruit Chemical Use Survey | 6,700 | 6,700 | - | 50 | 60 | 10 |

16. Tabulation, analysis, and publication plans.

NASS will generate a summary of responses for each question at both the state and national level. The published data will be posted to the home page for the Office of Pest Management Policy which can be found at:

<https://www.ars.usda.gov/office-of-pest-management-policy/office-of-pest-management-policy-home-page/>.

17. Request for approval of non-display of expiration date.

No request is being made for approval of non-display of the expiration date.

18. Exceptions to certification statement.

No exceptions to the certification statement are requested.

June 2019