

ATTACHMENT L

Standard Consultation Questions from the U.S. Environmental Protection Agency to Respondents to the Information Collection Request: “Application for New and Amended Pesticide Registration”

Company Name: BPIA

Name of person contacted: Amy Plato Roberts

Date: January 21, 2020

1. Consultation Questions

a. Publicly Available Data

- i. Is the information that the Agency seeks available from any public source or already collected by another office at EPA or by another agency?
- ii. If yes, where can you find the data?

2. Frequency of Collection

- a. 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 utilize them.
 - i. Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and how to submit the 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 the any pesticide registration forms, do you use them? Are they clear, logical, and easy to complete?

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 was that, before September 2015, the

Agency was unable to ensure the security of CBI that might be transmitted over the Internet.

- i. 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, magnetic media-based submissions (e.g., diskette, CD-ROM, etc.), and through EPA’s new Pesticide Submissions Portal (PSP).
- ii. Are you keeping your records electronically? If yes, in what format?
- iii. Have you used the new Pesticide Submissions Portal?
 1. If yes, how long did it take you to create a login and a password through the Central Data Exchange (CDX) reporting site? How long did it take you to submit each form on PSP?
- iv. Since the Agency started offering an electronic reporting option for CBI-related data through EPA’s CDX reporting site, would you be more inclined to submit CBI via PSP or on diskette than on paper?
- v. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?

5. Burden and Costs

- a. Are the labor rates accurate?
- b. The Agency assumes there is no capital cost associated with this activity. Is that correct?
- 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?
- d. Have you incurred additional paperwork burden as a result of third-party disclosure requirements involving disclosing product specific information to potential users and the general public through the pesticide label?
- e. Are there other costs that should be accounted for that may have been missed?

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.