

Attachment D
Record of Consultations for OPP ICR: "Plant-Incorporated Protectants; CBI Substantiation
and Adverse Effects Reporting,"
(OMB No. 2070-0142, EPA No. 1693.09)

I. Representative(s) Consulted:

1. Kara S. Giddings
Monsanto Company
700 Chesterfield Pkwy West
St. Louis, MO 63017
(636) 737-9544
kara.s.giddings@monsanto.com

2. Matthew Pence
J.R. Simplot Company
5369 W. Irving St.
Boise, ID 83706
(208) 780-6040
matthew.pence@simplot.com

3. Katie Davis
Syngenta Crop Protection, LLC
9 Davis Drive
Research Triangle Park, NC 27709-2257
(919) 226-7374
katie.davis@syngenta.com

II. Consultation Questions

1. Publicly Available Data

- Is the information that the Agency seeks available from any public source or already collected by another office at EPA or by another agency?
 1. No
 2. No
 3. No

- If yes, where can you find the data?
 1. N/A
 2. N/A
 3. N/A

2. Frequency of Collection

- Can the Agency collect the information less frequently and still produce the same outcome?
 1. In our opinion, the frequency of every three years is appropriate.
 2. No.
 3. The frequency is sufficient.

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 the data?
 1. Yes
 2. Yes
 3. Syngenta has limited experience, if any, in utilizing these specific instructions for PIPs, and therefore is not in a position to make suggestions on how to clarify them.
 - If not, what suggestions do you have to clarify the instructions?
 1. N/A
 2. N/A
 3. N/A
- Do you understand that you are required to maintain records?
 1. Yes
 2. Yes
 3. Yes
- Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical and easy to complete?
 1. No
 2. No, the flexibility of the format allows for clarity of presentation regardless of the type of information being submitted.
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. In general Syngenta has found that it is clear, logical, and easy to provide EPA with requested information.

- Regarding any pesticide registration forms, do you use them? Are they clear, logical, and easy to complete?
 1. Yes, Monsanto Company uses the appropriate pesticide registration forms which we find clear, logical, and easy to complete.
 2. We use the forms and they are clear and easy to complete.
 3. Syngenta has limited experience, if any, utilizing these forms to submit the information discussed within this ICR for PIPs. In general, for PIP registration purposes, Syngenta has found that it is easy to utilize EPA's pesticide registration forms.

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.

- 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).
 1. Monsanto Company has transitioned to making all PIP submissions as applicable to the PSP electronic reporting method.
 2. Electronic alternatives for recordkeeping and data submission simplify the submission process. Documents are more easily maintained, searched, and retrieved using electronic formats. Paper use and/or waste is reduced.
 3. Syngenta has utilized the PSP for submission of original registration documents and documents associated with compliance with terms and conditions of existing registrations. Syngenta strongly supports electronic submissions as a way to reduce the burden of generating and maintaining paper based records.
- Are you keeping your records electronically? If yes, in what format?
 1. Yes, Monsanto Company maintains electronic records of all PIP submissions in a PDF format.
 2. Yes, as Word documents (.docx, .xlsx) and in portable document format (.pdf).
 3. Yes, PDF, Microsoft Word, and Microsoft Excel are used.

- Have you used the new Pesticide Submissions Portal to submit the information being collected in this ICR?
 - 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 the information related to this ICR in the PSP?
 1. In our experience, it took approximately 1.0 hours to establish login and password credentials through CDX. The actual submission was less in time equaling approximately 0.5 hour.
 2. No.
 3. No, Syngenta has used the PSP only for submission of original registration documents and documents associated with compliance with terms and conditions of existing registrations. ... 10-15 minutes... Not applicable.

- Since the Agency started offering an electronic reporting option through EPA's CDX reporting site, would you be more inclined to submit the information associated with this ICR in PSP or on diskette than on paper?
 1. Yes
 2. Yes
 3. Syngenta would be more inclined to utilize the PSP.

- What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information?
 1. The benefit of making electronic submission reduces the burden of time to gather information, review information, and make the submission.
 2. Electronic submissions would reduce burdens associated with cost and time for printing, compiling, and shipping.
 3. Since Syngenta has begun using the PSP, Syngenta has been able to eliminate the need for hard copy documents associated with EPA registrations in most cases.

5. Burden and Costs

- Are the labor rates accurate?
 1. Yes
 2. Yes
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. Therefore, for questions in Section 5, Syngenta is not in a position to determine the accuracy of labor rates, capital costs, and/or other burdens associated with these processes.

- The Agency assumes there is no capital cost associated with this activity. Is that correct?
 1. Yes
 2. Yes
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. Therefore, for questions in Section 5, Syngenta is not in a position to determine the accuracy of labor rates, capital costs, and/or other burdens associated with these processes.

- 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?
 1. Yes
 2. Yes
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. Therefore, for questions in Section 5, Syngenta is not in a position to determine the accuracy of labor rates, capital costs, and/or other burdens associated with these processes.

- 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?
 1. No.
 2. No
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. Therefore, for questions in Section 5, Syngenta is not in a position to determine the accuracy of labor rates, capital costs, and/or other burdens associated with these processes.

- 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.
 1. No burden and cost estimates were found to be substantially different from EPA's.
 2. No.
 3. Syngenta has limited experience, if any, utilizing these specific processes for PIPs. Therefore, for questions in Section 5, Syngenta is not in a position to determine the accuracy of labor rates, capital costs, and/or other burdens associated with these processes.