

Supporting Statement for an Information Collection Request (ICR) Under the Paperwork Reduction Act (PRA)

EXECUTIVE SUMMARY

Identification of the Information Collection – Title and Numbers

Title: EPA's Safer Choice Program Product and Partner Recognition Activities

EPA ICR No.: 2692.01

OMB Control No.: 2070-NEW

Docket ID No.: EPA-HQ-OPPT-2021-0245

Abstract

This consolidated ICR will cover the information collection activities associated with the reporting and recordkeeping requirements for individuals, businesses, organizations, and government entities participating in or collaborating with EPA's Safer Choice program from two previously approved ICRs (OMB Control No. 2070-0178; EPA ICR No. 2302.02 and OMB Control No. 2070-0182; EPA ICR No.2487.02). These components are designed to::

- Improve data efficiency by electronic data collection via a cloud-based Salesforce system called the Safer Choice Community;
- Monitor the public's awareness of the Safer Choice program and label; and,
- Clarify the Safer Choice Partner of the Year Awards application process and form.

Summary Total Burden and Costs

IC Summary Table: Annual Burden and Cost over the Three-Year ICR Period			
IC Category	Responses	Burden	Total Cost
Respondents			
IC #1: Safer Choice program	157	1,596	\$1213068
IC #2: Safer Choice label redesign consultations	2,330	1,111	\$51,106
IC #3: Safer Choice Partner of the Year Awards	35	525	\$34,030
Annual Total	2,522	3,232	\$751,942
Agency			
IC #1: Safer Choice program	N/A	658	\$46,664
IC #2: Safer Choice label redesign consultations	N/A	15	\$20,884
IC #3: Safer Choice Partner of the Year Awards	N/A	54	\$3,960
Annual Total	N/A	727	\$71,508

SUPPORTING STATEMENT

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

1(a). Related Legal and/or Administrative Requirements

The related legal authority derives from Section 6604(b)(5) of the Pollution Prevention Act (PPA), (42 U.S.C. 13103(b)(5) (Attachment A), which directs EPA to facilitate the adoption of source-reduction techniques by businesses, and the Toxic Substances Control Act (TSCA), (15 U.S.C. 2601 et seq.), which encourages safety through technological innovation in chemistry. EPA has developed the Safer Choice program in recognition of this statutory directive, and through consultation with a broad range of stakeholders.

1(b). Necessity of the Information Collection

The information collection activities covered by this ICR are necessary components of the Safer Choice program established under PPA and TSCA mandates.

Safer Choice information collection activities will assist the Agency in meeting the goals of the PPA by: (1) providing resources and recognition for individuals, businesses,

organizations, and government entities committed to the design, manufacture, selection, promotion, sale, and use of products with safer chemical ingredients and to innovation in safer chemistry; (2) ensuring that the Safer Choice label and educational activities effectively communicate the Agency's missions under the PPA and TSCA; and (3) recognizing the leadership contributions of Safer Choice partners and stakeholders who, over the past year, have shown achievement in the design, manufacture, selection, promotion, sale, and use of products with safer chemical ingredients, that further outstanding or innovative source reduction. In turn, the Safer Choice program will help businesses meet corporate sustainability goals by providing the means to, and an objective measure of, environmental stewardship.¹ Investment analysts and advisers seek these types of measures in evaluating a corporation's sustainability profile and investment worthiness. It is not surprising, then, that EPA has heard from many organizations that Safer Choice program partnership is an important impetus for prioritizing and completing the transition to safer chemical products. The Safer Choice program is also needed to increase demand for and encourage the development of safer chemical-based products, to the benefit of consumers, including low income and minority communities, manufacturing partners, retailers, other stakeholders, and the environment.

Safer Choice has carefully tailored its request for information to ensure that it only asks for information essential for verifying applicant and product eligibility for recognition (e.g., via the Safer Choice Community cloud-based Salesforce system), testing the qualities of the selected label concepts and outreach efforts, and verifying an applicant's eligibility for award or recognition (e.g., via the Safer Choice Program Partner of the Year application form).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The information collected by the Safer Choice program is not designed or intended to support regulatory decision-making by EPA. EPA will use the information collected to: (1) promote the program's scientific basis and the human health and environmental benefits of using products with safer chemical ingredients, (2) increase consumer recognition of certified products with safer ingredients carrying the Safer Choice label, (3) recognize businesses and others already involved in the Safer Choice program and encourage additional businesses to participate in the Safer Choice program, and (4) further drive innovation and the development of products with safer chemical ingredients that protect human health and the environment.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting

¹ "Green to Gold: How Smart Companies Use Environmental Strategy to Innovate, Create Value, and Build Competitive Advantage;" Daniel Esty and Andrew Winston; Yale University Press, New Haven, CT; 2006.

electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In order to facilitate collection activities, the Safer Choice program has implemented the Safer Choice Community cloud-based Salesforce system that houses application, review, and notification processes. This system is a centralized location for information collected as part of the Safer Choice program's various activities. In addition, the Agency will accept more traditional methods of delivery (mail, commercial delivery service, or hand delivery) as well as faxed and e-mailed application forms.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Respondents will not be asked to provide information that has been or is currently being collected by EPA, other federal or state agencies, or proprietary sources. The information collected by the Safer Choice program is unique and is not duplicative of previous information collection requests. EPA also checked with potential respondents to confirm that the information being collected does not exist elsewhere.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

EPA expects that some of the participants will be small entities. EPA has designed its application forms to minimize respondent burden while obtaining sufficient and accurate information. In addition, given the voluntary nature of the collection, EPA expects that respondents will participate only if the benefits of participation outweigh the information collection burden.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The application forms included in this ICR are designed to be one-time information submissions for organizations that wish to participate in or be recognized by the Safer Choice program. In relation to using the Safer Choice label, this means that once every three years, the organization will submit a renewal application to confirm that no changes have been made to ingredients; this step is done in response to correspondence from Safer Choice that reminds organizations of the terms of their partnership agreements. The consumer online survey to test awareness of the Safer Choice label will be conducted annually to measure trends in consumer recognition of the label. The Partner of the Year Awards application form is designed to be an annual information submission for only those organizations interested in being considered for the award.

- 7. Explain any special circumstances that require the collection to be conducted in a manner:**
- a) requiring respondents to report information to the agency more often than quarterly;**
 - b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - c) requiring respondents to submit more than an original and two copies of any document;**
 - d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Not applicable.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside EPA to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Pursuant to [5 CFR 1320.8\(d\)\(1\)](#) in proposing to submit this ICR, EPA published a notice in the Federal Register on June 28, 2021, that provided a 60-day public comment period (86 FR 34006) (FRL-10023-20-OCSP). EPA received two comments in response to the 60-day public review opportunity. The comments received have been posted in the docket and are summarized below.

As required under 5 CFR 1320.8(d)(1), in addition to the public notice EPA staff contacted appropriate stakeholders and asked them for their assessment of the regulatory burden estimates expressed by the Agency in this ICR. The following stakeholders were contacted:

- American Cleaning Institute (ACI)
- International Sanitary Supply Association (ISSA)
- Household & Commercial Products Association (HCPA)

The comments received from stakeholders are summarized below, and the full consultation is included in Attachment K.

This is a new ICR that summarizes the information collection activities for the Safer Choice program – a voluntary program administered by the EPA. Currently the Safer Choice program has two ICRs that are approved by the OMB under the separate OMB control numbers identified:

- 1) OMB Control No. 2070-0178; EPA ICR No. 2302.03; entitled “Safer Choice Product Recognition Program (Renewal)”; approved through 05/31/2022
- 2) OMB Control No. 2070-0189; EPA ICR No. 2487.02; entitled “Safer Choice Label Consultations (Renewal)”; approved through 11/30/2022.

Summary of Comments Received in Response to Federal Register Notice

Reckitt requested that there be provisions in the ICR to allow for testing redesigns of the current Design for the Environment (DfE) label for use on pesticides that would signal safer chemistries.

EPA response: EPA appreciates the comment. In response, EPA has modified the Moderator’s Guide for the Consumer Focus Group Session (Attachment G) and the Survey to Test Awareness and Perceptions of EPA’s Safer Choice Label and Alternate Labels (Attachment H) to allow for testing of the DfE label. Accordingly, EPA also updated the hour burden and cost for IC #2 (Safer Choice label redesign consultations) to

allow for additional questions to be asked about the DfE label in the consumer online surveys conducted under IC #2.

HCPA commented that with regard to the Partner of the Year Awards portion of the ICR, the cost and burden estimates presented in the ICR are consistent with their experience as a Partner of the Year applicant. However, HCPA questioned whether the ICR adequately accounts for the information that is collected from Partner of the Year awardees in advance of the award ceremony, including verifying awardee information, gathering awardee logos, and other items associated with the ceremony.

EPA response: EPA appreciates the comment. This ICR pertains specifically to the application process for the Partner of the Year Awards. The ceremony and logistical arrangements around the ceremony are not within the scope of the ICR. Additionally, EPA assumes that logistical activities in advance of the ceremony, such as verifying contact information, would take little time to carry out. EPA did not make any changes to the ICR in response to this comment.

Regarding the Safer Choice product recognition program applications portion of the ICR, HCPA noted that the estimates presented in the ICR are consistent with their experience with performing a pilot product submission. They also commented that there can be considerable variability during the product review by third-party profilers, which can vary depending on whether the ingredients have been previously evaluated.

EPA response: EPA appreciates the comment. The variability mentioned by the commenter was accounted for when developing the burden estimates presented in this ICR.

Summary of Comments Received from Stakeholders Contacted by EPA

Regarding the Partner of the Year Awards portion of the ICR, ACI estimated that they spent 10 hours this year preparing their submission to be considered for an award.

EPA response: EPA appreciates receiving this information, which is in line with the burden estimates used in developing this ICR (detailed in Attachment J).

ISSA indicated that the data required to be submitted under this ICR are not available from any other public source; that the instructions clearly describe what respondents are required to do; that the proposed collection of information is necessary for the proper performance of the functions of EPA and will be of great utility to the Agency; that EPA's estimates of the burden of the proposed

collection of information are reasonable and accurate; and that the quality, utility, or clarity of the information to be collected could not be improved significantly.

EPA response: EPA appreciates receiving this information in support of this ICR.

HCPA was also contacted by EPA and chose to submit their feedback as a comment on the docket; this comment is described above.

EPA response: See above.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

For the purposes of this data collection, we anticipate the total incentive/travel reimbursement offered to each consumer focus group participant to be \$100. For further information, refer to Supporting Statement B of EPA ICR No. 2487.02 (OMB Control No. 2070-0189).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Some information collected by EPA through the Safer Choice program involves confidential business or trade secret information. The Safer Choice program handles all information claimed as such as confidential business information in accordance with Agency confidentiality procedures (see 40 CFR part 2, subpart B). The Safer Choice program uses information provided by businesses solely for the purposes related to forming partnerships and discloses the information only to EPA employees and EPA contractors cleared for confidential information with a specific need to know.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collection activities discussed in this document do not involve any sensitive questions involving sexuality, religious beliefs, political affiliation, or other matters considered private, as referred to in the Supporting Statement for PRA Submissions in the document "Guidance on Agency Survey and Statistical Information Collections," from January 20, 2006. EPA will adhere to its Privacy Policy (EPA classification number 2151) that establishes requirements for safeguarding the

collection, access, use, dissemination, and storage of personally identifiable information (PII) and Privacy Act information in accordance with the Privacy Act of 1974, the E-Government Act of 2002, the Federal Information Security Management Act (FISMA), and policy and guidance issued by the President and OMB.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

For each respondent category, this section of the ICR describes the respondents, the information collection activities and related estimates for hour burden and costs associated with those activities. See Attachment J for detailed calculations of burden and cost.

12(a). Methodology for Estimating Respondent Burden and Costs

The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the paperwork requirements are described below:

- 325180 Other Basic Inorganic Chemical Manufacturing
- 325199 All Other Basic Organic Chemical Manufacturing (Primary)
- 325320 Pesticide and Other Agricultural Chemical Manufacturing
- 325510 Paint and Coating Manufacturing
- 325520 Adhesive Manufacturing
- 3256 Soap, Cleaning Compound, and Toilet Preparation Manufacturing
- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325613 Surface Active Agent Manufacturing (Primary)

- 325620 Toilet Preparation Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 423850 Service Establishment Equipment and Supplies Merchant Wholesalers (Primary)
- 424490 Other Grocery and Related Products Merchant Wholesalers
- 424690 Other Chemical and Allied Products Merchant Wholesalers (Primary)
- 424990 Other Miscellaneous Nondurable Goods Merchant Wholesalers
- 4451 Grocery Stores
- 445110 Supermarkets and Other Grocery (except Convenience) Stores (Primary)
- 445299 All Other Specialty Food Stores
- 446110 Pharmacies and Drug Stores
- 453210 Office Supplies and Stationery Stores
- 453998 All Other Miscellaneous Store Retailers (except Tobacco Stores) (Primary)
- 454110 Electronic Shopping and Mail-Order Houses
- 481 Air Transportation
- 531120 Lessors of Nonresidential Buildings (except Miniwarehouses)
- 531312 Nonresidential Property Managers
- 541714 Research and Development in Biotechnology (except Nanobiotechnology) (Primary)
- 561210 Facilities Support Services
- 561720 Janitorial Services
- 561740 Carpet and Upholstery Cleaning Services
- 611110 Elementary and Secondary Schools
- 611310 Colleges, Universities, and Professional Schools
- 622110 General Medical and Surgical Hospitals
- 711310 Promoters of Performing Arts, Sports, and Similar Events with Facilities
- 7211 Traveler Accommodation
- 722511 Full-Service Restaurants
- 8123 Dry cleaning and Laundry Services
- 813410 Civic and Social Organizations (Primary)
- 813910 Business Associations (Primary)
- 921190 Other General Government Support

- 924110 Administration of Air and Water Resource and Solid Waste Management Programs (Primary)

12(b). Estimated Respondent Burden and Costs by Information Collection

IC #1: Safer Choice product recognition program applications (Safer Choice program)

Respondent NAICS Codes:

- 325510 Paint and Coating Manufacturing
- 3256 Soap, Cleaning Compound, and Toilet Preparation Manufacturing
- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 424690 Other Chemical and Allied Products Merchant Wholesalers

Information Collection Activities:

Once a company with an interest in partnership with the Safer Choice program reviews the program materials and decides to apply, the next step for the organization is to submit the appropriate application.

Data items:

Applicants for this voluntary program submit information items that vary depending upon the class of product. The items include:

Partnership Applications

Product manufacturers will submit ingredient information, as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified third-party profiler before submittal to EPA. See Attachment B.

Information submitted to third-party profilers:

- Company name and website URL;
- Number of employees;
- Company headquarters address and manufacturing address;
- Name, title, phone number, and e-mail address of the candidate's signatory contact person (e.g., CEO, or vice president for health and environment);
- Name, title, phone number, and e-mail address of candidate's technical contact person;
- Name, title, phone number, and e-mail address of candidate's marketing/outreach contact person;

- Product information (name(s), UPC, GSA number, sector, production volume, pH, product form, product use);
- Product characteristics on whether or not the product:
 - o Is an EPA registered pesticide;
 - o Is a direct release product;
 - o Is a concentrate;
 - o Contains enzymes, fragrance, or VOCs;
 - o Requires hazard labeling;
 - o Ingredient disclosure and performance data submitted;
- Packaging information:
 - o Container size and shapes;
 - o Material;
 - o Supplier;
- Description of all chemical ingredients, including raw materials and alternative ingredients, in product:
 - o CAS number;
 - o Chemical name;
 - o Trade name;
 - o Percent composition;
 - o Ingredient class;
 - o Supplier name;
- Other product information, including product packaging description, product flashpoint, and compostability;
- Safety Data Sheet (SDS) for the product and each ingredient;
- Product performance testing (any method of demonstrating product performance is acceptable as long as it is a commonly used industry standard);
- If available, any supplemental product or ingredient environmental health and safety information, such as:
 - o Biodegradation tests on individual ingredients;
 - o Acute aquatic toxicity tests on product as a whole or individual ingredients;
 - o Human health and safety tests;
- Description of the type of training the company provides to customers on environmental and worker safety matters.

Information submitted to EPA:

- Summary report, containing same data items as above

Adding Private Label Partners, Products, and Alternate Product Names

Cleaning product manufacturers will submit information about private label additions to Safer Choice. To be label-eligible, private label products must contain ingredients identical to those in a Safer Choice-certified product. The three types of private label partners and products are private labels, licensees, and toll manufacturers. Cleaning product manufacturers will also submit information about alternate product names sold by the same manufacturer. To be label-eligible, alternate products must contain ingredients identical to those in a Safer Choice-certified product. See Attachment C.

Information submitted to EPA through the Safer Choice Community cloud-based Salesforce system includes:

- Private label company name and website URL;
- Number of employees;
- Company headquarters address;
- Name, title, phone number, and e-mail address of candidate's marketing/outreach contact person;
- Current Safer Choice-certified product that is identical to the private label product;
- Product information (name(s), UPC, GSA number, sector, production volume, pH, product form, product use); and
- Product label and packaging information.

Ingredient Submissions

Product and/or chemical manufacturers will submit ingredient information as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified third-party profiler before submittal to EPA. See Attachment B. Chemicals and ingredients submitted to EPA are candidates for listing on the Safer Choice Safer Chemical Ingredients List, candidates for GreenBlue's CleanGredients® database, or are provided in support of customers' product reviews.

Information submitted to third-party profilers:

- Ingredient name/trade designation and alternate name(s);
- Company name and website URL;
- Company headquarters address;
- Name, title, phone number, and e-mail address of candidate's technical contact person;
- Description of all chemicals, including raw materials and alternatives, in the ingredient:
 - o CAS number;
 - o Chemical name;
 - o Trade name;

- o Percent composition;
- o Ingredient class;
- o Supplier name;
- Structural and chemical identity information including particle size;
- Ingredient characteristics on whether or not the ingredient:
 - o Contains preservatives, stabilizers, or antioxidants;
 - o Contains residuals, impurities, or by-products;
 - o Has proprietary biodegradation or toxicity test reports;
 - o Is dry or in solution;
- An SDS for the overall ingredient and each sub-ingredient;
- If available, any supplemental product or ingredient environmental health and safety information, such as:
 - o Biodegradation tests on individual ingredients;
 - o Acute aquatic toxicity tests on product as a whole or individual ingredients; and
 - o Human health and safety tests.

Information submitted to EPA:

- Summary report, containing same data items as above

Respondent activities:

Applicants for Cleaning and Non-Cleaning Product Formulation Partnerships

- Review program information, including instructions on submitting information to third-party profilers
- Submit information described in section 12(b) of this supporting statement to third-party profiler
- Establish agreement with third-party profiler
- Submit summary report to Safer Choice
- Negotiate / establish Partnership Agreement with Safer Choice
- Renew partnership, with no changes needed
- Site and desk audit (See Attachment D)

Adding Private Label Partners and Products and Alternate Product Names

- Review program information
- Submit information described in section 12(b) of this supporting statement to Safer Choice

IC #1. Safer Choice product recognition program applications				
Data Element	Form	Responses	Burden	Cost (Hour Burden Only)
Establishing partnership agreements	N/A	44	704	\$55,968
Renewals and audits	N/A	36	276	\$18,576
Adding private label, licensee, and toll manufacturer partners and products	N/A	77	616	\$46,662
Annual Total		157	1,596	\$121,206

IC #2: Safer Choice label consultations and consumer awareness

Respondents:

Respondents will be adult members of the general population who are consumers, including consumers who consider the environment when making purchasing decisions, herein called leaning green consumers.

Information Collection Activities:

Respondents screened for focus group participation will listen to questions and provide answers to those questions. Those selected to participate in the focus groups will listen to directions, be presented with materials for discussion, participate in group discussions, and complete forms. Consumer online survey participants will read directions, answer questions, and submit the online survey.

IC #2. Safer Choice label redesign consultations			
Data Element	Responses	Burden	Cost (Hour Burden Only)
Screening questionnaire for consumer focus groups	300	51	\$2,346
Consumer focus groups	30	60	\$2,760
Awareness test of new visual mark – general adult population survey	2,000	1,000	\$46,000
Annual Total	2,330	1,111	\$51,106

IC #3: Safer Choice Partner of the Year Awards program

Respondent NAICS Codes:

- 325180 Other Basic Inorganic Chemical Manufacturing
- 325199 All Other Basic Organic Chemical Manufacturing (Primary)
- 325320 Pesticide and Other Agricultural Chemical Manufacturing
- 325510 Paint and Coating Manufacturing
- 325520 Adhesive Manufacturing

- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325613 Surface Active Agent Manufacturing (Primary)
- 325620 Toilet Preparation Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 423850 Service Establishment Equipment and Supplies Merchant Wholesalers (Primary)
- 424490 Other Grocery and Related Products Merchant Wholesalers
- 424690 Other Chemical and Allied Products Merchant Wholesalers (Primary)
- 424990 Other Miscellaneous Nondurable Goods Merchant Wholesalers
- 4451 Grocery Stores
- 445110 Supermarkets and Other Grocery (except Convenience) Stores (Primary)
- 445299 All Other Specialty Food Stores
- 446110 Pharmacies and Drug Stores
- 453210 Office Supplies and Stationery Stores
- 453998 All Other Miscellaneous Store Retailers (except Tobacco Stores) (Primary)
- 454110 Electronic Shopping and Mail-Order Houses
- 481 Air Transportation
- 531120 Lessors of Nonresidential Buildings (except Miniwarehouses)
- 531312 Nonresidential Property Managers
- 541714 Research and Development in Biotechnology (except Nanobiotechnology) (Primary)
- 561210 Facilities Support Services
- 561720 Janitorial Services
- 561740 Carpet and Upholstery Cleaning Services
- 611110 Elementary and Secondary Schools
- 611310 Colleges, Universities, and Professional Schools
- 622110 General Medical and Surgical Hospitals
- 711310 Promoters of Performing Arts, Sports, and Similar Events with Facilities
- 7211 Traveler Accommodation
- 722511 Full-Service Restaurants
- 8123 Dry cleaning and Laundry Services
- 813410 Civic and Social Organizations (Primary)

- 813910 Business Associations (Primary)
- 921190 Other General Government Support
- 924110 Administration of Air and Water Resource and Solid Waste Management Programs (Primary)

Information Collection Activities:

Once a prospective organization reviews the Partner of the Year Awards materials and decides to apply, it should submit a Partner of the Year Awards Application Form (see Attachment I for complete form). All forms will be available in electronic format.

Participants can download PDF versions of the forms from the Safer Choice website at www.epa.gov/saferchoice.

Data items:

The reporting items include:

- Organization name and website URL;
- Name, title, address, phone number, fax number, and e-mail address of the candidate's primary contact person;
- Recognition category (or categories) for which the candidate is applying;
- Indication of whether the organization is a small business;
- Indication of whether the organization should be considered for sustained excellence;
- Descriptions of activities taken to qualify for recognition;
- Signature, name, and title of senior company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory).

Respondent activities:

Candidates will conduct the following activities in order to complete and submit the Partner of the Year Awards Application Form:

- Review the Partner of the Year Awards information;
- Decide whether to apply for recognition, and in what recognition category or categories;
- Select a primary contact person for the program;
- Complete the Partner of the Year Awards Application Form, including obtaining the signature of a company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory);
- Describe how their organization meets the evaluation criteria for the relevant recognition;
- Fax, e-mail, or mail the form to EPA;
- Provide relevant documentation to EPA upon request.

IC #3. Safer Choice Partner of the Year Awards Program				
Data Element	Form	Responses	Burden	Cost (Hour Burden Only)
Partner of the Year Awards Application Form for formulators/product manufacturers	9600-023	19	285	\$18,473
Partner of the Year Awards Application Form for innovators	9600-023	5	75	\$4,861
Partner of the Year Awards Application Form for retailers	9600-023	3	45	\$2,917
Partner of the Year Awards Application Form for supporters	9600-023	6	90	\$5,834
Partner of the Year Awards Application Form for purchasers and distributors	9600-023	2	30	\$1,945
Annual Total		35	525	\$34,030

12(c). Total Estimated Respondent Burden and Hour Burden Costs

IC Summary Table: Annual Burden and Cost over the Three-Year ICR Period			
IC Category	Responses	Burden	Cost (Hour Burden Only)
IC #1: Safer Choice program	157	1,596	\$121,206
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Annual Total	2,522	3,232	\$206,342

IC Summary Table: Total Burden and Cost over the Three-Year ICR Period			
IC Category	Responses	Burden	Cost (Hour Burden Only)
IC #1: Safer Choice program	471	4,788	\$363,618
IC #2: Safer Choice label redesign consultations	6,990	3,333	\$153,318
IC #3: Safer Choice Partner of the Year Awards	105	1,575	\$102,090
Total	7,566	9,696	\$619,026

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

As shown in Attachment J, the only operation and maintenance cost associated with this information collection is the respondents' cost of establishing an agreement with a third-party profiler. The cost associated with this activity is estimated to be \$12,400 annually. This estimate assumes that the typical application submitted by a cleaning product manufacturer will contain four products, each with 2 ingredients (\$650 each), 1 proprietary ingredient (\$1,300), and a \$500 administrative fee. The total cost per product is \$3,100. The total will be \$12,400 per company per application. Since 44 responses are expected under the Partnership Agreements collection activity (as explained in Attachment J), the total annual operation and maintenance cost is \$545,600.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

14(a). Agency Activities

The Safer Choice program consists of a variety of programs and initiatives that work together to meet the mission of the program. This change in name is intended to enhance public awareness of the program and its goals and increase overall participation in the program itself. As such, it is important to promote and recognize the efforts of dedicated partners. This new ICR is part of an effort to integrate and streamline the individual collection activities across the program.

Under the Safer Choice program, EPA engages in the following activities related to the application and decision process:

- Answer questions posed by potential applicants, including product manufacturers regarding recognition under the program and ingredient manufacturers regarding qualification for use in Safer Choice-certified products;
- Receive the completed applications, review for accuracy, and place any necessary follow-up calls;
- Apply EPA's chemical tools and expertise to understand toxicological characteristics of chemical ingredients and to ensure that they are the safest within their functional use class;
- Approve candidates for recognition and notify both successful and unsuccessful applicants of the decisions; and
- Make final decisions about which products may be certified and carry the Safer Choice label.

EPA has developed the Safer Choice Community cloud-based Salesforce system to house applications and other information related to the Safer Choice program to reduce the public and Agency burden related to the application and decision process.

Under the Safer Choice program, EPA engages in the following activities in relation to consumer awareness and evaluation of the success of the Safer Choice label which was launched in March 2015:

- Conduct consumer focus groups to test awareness and perception of the Safer Choice program;
- Conduct annual consumer online surveys to evaluate consumer awareness and perceptions of the Safer Choice label;
- Review and analyze consumer online survey results; and

- Use results to measure consumer awareness and perceptions of the Safer Choice label.

Under the Safer Choice program, EPA engages in the following activities in relation to the Partner of the Year Awards:

- Distribute the Awards Application Form to potential participants and maintain a downloadable PDF version on the Safer Choice website;
- Answer questions posed by potential applicants regarding Partner of the Year Awards recognition;
- Receive the completed forms, review for completeness, and place any necessary follow-up calls;
- Screen award applicants to determine their history of civil or criminal EPA enforcement actions; and
- Approve candidates for Partner of the Year Awards recognition based on evaluation criteria (see Attachment I, Section 2) and notify both successful and unsuccessful applicants of the decisions.

14(b). Estimated Agency Costs

EPA estimates that it costs the agency approximately \$214,523 (\$71,508 annually) to carry out the activities associated with the information collection activities covered by this ICR. Agency labor costs are calculated based on hourly basic rates for federal employees in the Washington-Baltimore area published by the Office of Personnel Management effective January 2021.¹ The average hourly labor rate for managerial staff is estimated as the rate for a GS-13 Step 5 employee, for technical staff as a GS-10 Step 10 employee, and for clerical staff as GS-5 Step 1. These GS-level assumptions are consistent with those used in past EPA Office of Pollution Prevention and Toxics (OPPT) ICRs. The hourly rates were multiplied by an assumed loading factor of 1.639 to reflect federal fringe benefits. This loading factor is from a study by the Congressional Budget Office,² which is recommended in EPA's *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions*³ as a useful source for estimating benefit values for federal government workers.

14(c). Collection Schedule

1 OPM, 2021. Salary Table 2021-DCB. *Washington-Baltimore-Arlington, DC-MD-VA-WV-PA*. Available at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/DCB_h.aspx

2 Falk, J. 2012. *Comparing Benefits and Total Compensation in the Federal Government and the Private Sector*. Congressional Budget Office Working Paper Series. Retrieved from <https://www.cbo.gov/sites/default/files/112th-congress-2011-2012/workingpaper/2012-04fedbenefitswp0.pdf>

3 U.S. Environmental Protection Agency (U.S. EPA) National Center for Environmental Economics. 2020. *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions*. EPA-236-B-15-001. December 9, 2020.

Collection schedules under each part of the ICR are as follows:

- For the Safer Choice program, organizations may submit applications at any time during the three-year period. Once approved, the Safer Choice recognition lasts for a three-year period.
- Consumer online surveys will be distributed at yearly intervals during the course of the three-year approval period.
- For the Partner of the Year Awards program, organizations can submit an application for each of the three years.

15. Explain the reasons for any program changes or adjustments reported in hour or cost burden.

This information collection combines the burdens from two previously approved ICRs, EPA ICR No. 2302.03 (OMB Control No. 2070-0178) and EPA ICR No. 2487.02 (OMB Control No. 2070-0189). The total combined burden from these two previously approved ICRs was 7,118 hours (4,788 hours and 2,330 hours for the two ICRs, respectively). The total burden requested for this ICR is 9,696 hours, or an increase of 2,578 hours from the previous total burden. The difference between the current burden request and the previously approved requests is primarily due to the inclusion of Partner of the Year Awards collection activities (1,575 hours) when calculating the burden of this ICR. Additionally, minor adjustments were made in EPA’s estimates of the number of respondents and of the burden. Specifically, the burden for previously approved EPA ICR No. 2487.02 increased by 1,003 hours (from 2,330 to 3,333 hours). The burden for previously approved EPA ICR No. 2302.03 has not changed, remaining at 4,788 hours.

The total combined cost burden (i.e., excluding hour burden) from these two previously approved ICRs was \$545,600 (\$545,600 and \$0 for the two ICRs, respectively). The total cost burden requested for this ICR remains the same.

The total requested time burden and cost burden compared to what is currently in the OMB inventory are shown in the table below. In addition, detailed breakdowns of the calculations for burden and cost estimates are available in Attachment J.

Total Burden and Cost over the Three-Year ICR Period (Requested and Previously Approved)		
IC Category	Requested	Previously Approved
IC #1: Safer Choice program (previously approved ICR EPA ICR No. 2302.03)		
Expiration Date	36 months from approval	5/31/2022
Responses	471	471*
Time Burden (Hours)	4,788	4,788**
Cost Burden (Dollars)	1,636,800	1,636,800***
IC #2: Safer Choice label redesign consultations (previously approved EPA ICR No. 2487.02)		
Expiration Date	36 months from approval	11/30/2022
Responses	6,990	6,990

Time Burden (Hours)	3,333	2,330
Cost Burden (Dollars)	0	0
IC #3: Safer Choice Partner of the Year Awards		
Expiration Date	36 months from approval	N/A
Responses	105	N/A
Time Burden (Hours)	1,575	N/A
Cost Burden (Dollars)	0	N/A
* Calculated as (157 responses/year) x (3 years) ** Calculated as (1,596 hours/year) x (3 years) *** Calculated as (\$545,600/year) x (3 years)		

16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

EPA does not request an exception to the certification of this information collection.

SUPPLEMENTAL INFORMATION

EPA Form 9600-017 and 9600-018

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 16 hours per response for formulators of cleaning and non-cleaning products and eight hours per response for partners wishing to add third-party partners and products, including the time for reviewing instructions, gathering information, and completing and reviewing the application. Send comments on the Agency’s need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support

Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA Form 9600-020

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 0.17 hours per response for screened respondents. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA Form 9600-021

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 2 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA Form 9600-022

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 0.5 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA Form 9600-023

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of

information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 15 hours per response, including the time for reviewing instructions, gathering information, posting information to the internet, and reviewing and completing the application. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OPPT-2020-0617, which is available at <http://www.regulations.gov>. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above.

You can also provide comments to the Office of Information and Regulatory Affairs, Office of Management and Budget via <http://www.reginfo.gov/public/do/PRAMain>. Find this particular information collection by selecting "Currently under 30-day Review—Open for Public Comments" or by using the search function.

All comments received by EPA will be included in the docket without change, including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI), or other information whose disclosure is restricted by statute. Do not submit electronically any information you consider to be CBI or other information whose disclosure is restricted by statute.

Notice: Due to public health concerns related to COVID-19, the EPA Docket Center and Reading Room are open to the public *by appointment only*. [Read more about the operating status](#).

LIST OF ATTACHMENTS

The attachments listed below can be found in the docket for this ICR or by using the hyperlink that is provided in the list below. The docket for this ICR is accessible electronically through <http://www.regulations.gov> using Docket ID Number: EPA-HQ-OPPT-2021-0245.

Ref.	Title
A	42 USC 13103 – Pollution Prevention Act Section 6604

B	Safer Choice Program: Product and Ingredient Submissions in the Safer Choice Community cloud-based Salesforce system
C	Safer Choice Program: Private Label Submissions in the Safer Choice Community cloud-based Salesforce system (Private Label Companies, Licensees, or Toll Manufacturers)
D	Safer Choice Program: Audit Process Guidance
E	Screening Questionnaire for General Adult Consumer Focus Group
F	Screening Questionnaire for "Leaning Green" Consumer Focus Group
G	Moderator's Guide for Consumer Focus Group Session
H	Survey to Test Awareness and Perceptions of EPA's Safer Choice Label and Alternate Labels: General Adult Population Survey
I	Safer Choice Program Partner of the Year Awards Application Form
J	Detailed Calculations of Burden and Cost Estimates
K	Stakeholder Consultation