

August 27, 2021
Linda Rutsch
Data Gathering and Analysis Division, 7406M
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Re: Agency Information Collection Activities; Proposed Renewal and Consolidation of Currently Approved Collections; EPA's Safer Choice Program Product and Partner Recognition Activities (EPA-HQ-OPPT-2021-0245)

Dear Ms. Rutsch,

On behalf of the Household & Commercial Products Association¹ (HCPA) and its members, we are submitting comments on the Agency Information Collection Activities; Proposed Renewal and Consolidation of Currently Approved Collections; EPA's Safer Choice Program Product and Partner Recognition Activities (EPA-HQ-OPPT-2021-0245). HCPA has a long history of supporting the Safer Choice program and many of our member companies are active partners as well.

As a multi-time submitter of a Safer Choice Partner of the Year award (and a proud recipient) we are pleased to note that the estimates of burden are reflective of our experience. One area that does not appear to be accounted for is associated with the Safer Choice Partner of the Year award ceremony itself. While the ceremony itself is outside of the scope of this collection effort, it is not clear that the information that is collected in advance of the award ceremony is adequately accounted for in this request. This would include information such as verifying the awardee information, logos of the awardee of the award, and other materials associated with the award ceremony.

While HCPA itself has had minimal experience with product submissions, we have performed a pilot product submission and the estimates are consistent with our experience. We will note that there can be considerable variability at the product review stage by the third-party certifiers that can vary greatly depending upon whether ingredients are listed on the Safer Choice Ingredient List (SCIL), have been previously evaluated, or are new ingredients undergoing evaluation. We have encouraged our members to share their experiences to the extent possible to better provide the agency a

¹ HCPA represents products including disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for pets, home, lawn, and garden; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

better appreciation for the associated burden.

We thank you for this opportunity to share our input and look forward to working with EPA and the Safer Choice program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steven Bennett', with a long horizontal flourish extending to the right.

Steven Bennett, Ph.D.

Executive Vice President, Scientific & Regulatory Affairs
Household & Commercial Products Association