

## **ATTACHMENT K**

### Stakeholder Consultation

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

EPA asked stakeholders the following questions:

- Are the data that are required to be submitted under this ICR available from any other public source that you are aware of, or are they data already collected by another EPA office or by another agency? If so, where can you find the data?
- Based on the instructions, is it clear to the respondents what they may be required to do and how to submit such data? If not, what suggestions do they have to clarify the instructions? Are reporting forms clear, logical, and easy to complete?
- Is the proposed collection of information necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility?
- Are the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, reasonable and accurate?
- Could the quality, utility, and clarity of the information to be collected be improved?

EPA contacted the following stakeholders, whose responses are included in full in this attachment:

**From:**  
**To:** FW: Safer Choice ICR  
**Cc:** Friday, July 30, 2021 9:18:15 AM  
**Subject:** [image001.png](#)  
**Date:** [image004.png](#)  
**Attachments:**

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**Warning from Abt:** External email. Be careful opening links and attachments.

Hello and happy Friday,

Another response from the ICR consultation.

[www.epa.gov/saferchoice](http://www.epa.gov/saferchoice)

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**Subject:** RE: Safer Choice ICR

Sorry to be so late with this reply. I sent out your request to the EPP Task Force. That group is comprised of many companies who participate in the various Safer Choice programs.

For our part, I've been talking with ACI's comms team who put together the submission for the Partner of the Year award. They estimate 10 hours for the tracking, pulling, writing, formatting and review involved in this year's submission.

Hope this helps!

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**Subject:** FW: Safer Choice ICR

[EXTERNAL SENDER]

Here's the Safer Choice ICR.

Thanks,

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**From:**  
**To:**  
**Cc:**  
**Subject:** FW: Help with the Safer Choice ICR  
**Date:** Tuesday, July 27, 2021 6:25:15 AM  
**Attachments:** [image001.png](#)  
[image004.png](#)

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**Warning from Abt:** External email. Be careful opening links and attachments.

Here is the response from ISSA on the ICR consultation.

[www.epa.gov/saferchoice](http://www.epa.gov/saferchoice)

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**Sent:** Thursday, July 22, 2021 2:33 PM

**Subject:** RE: Help with the Safer Choice ICR

Thank you very much for inviting ISSA to comment on the questions posed below related to the Safer Choice ICR. Our answers to the questions presented in your email are set forth below in the order asked.

- i. Are the data that are required to be submitted under this ICR available from any other public source that you are aware of, or are they data already collected by another EPA office or by another agency? If so, where can you find the data?

ISSA RESPONSE: In the opinion of ISSA, the data required to be submitted under the ICR is not available from any other public source that ISSA is aware of. Moreover, we believe that the required data is not something that is already collected by another office within EPA or any other agency that we are aware of.

- II. Based on the instructions, is it clear to the respondents what they may be required to do and how to submit such data? If not, what suggestions do they have to clarify the instructions? Are reporting forms clear, logical, and easy to complete?

ISSA RESPONSE: Yes, we believe the instructions are clear in describing to respondents what they are required to do including the submission of data. ISSA believes the reporting forms are clear, logical and easy to complete.

- III. Is the proposed collection of information necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility?

ISSA RESPONSE: Yes, in the opinion of ISSA, the proposed collection of information is necessary for the proper performance of the functions of EPA. More specifically, the information solicited will be of great utility to EPA going forward and assist the Agency in its functions.

- IV. Are the Agency's estimates of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, reasonable and accurate?

ISSA RESPONSE: In ISSA's opinion, the EPA's estimates of the burden of the proposed collection of information is reasonable and accurate given the task at hand. Furthermore, we believe the methodology and assumptions to be both valid and appropriate.

- V. Could the quality, utility, and clarity of the information to be collected be improved?

ISSA RESPONSE: No. We do not believe that the quality, utility or clarity of the information to be collected could be improved significantly.

Linda, we sincerely hope that the above responses adequately address the questions posed. Should you have any questions, please feel free to contact me directly.

ISSA

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On June 28, 2021, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register (FR 10023-20) announcing that EPA is planning to submit a request to renew and consolidate existing approved Information Collection Requests (ICRs) to the Office of Management and Budget (OMB), and requesting public comment. The consolidated ICR is entitled: “Safer Choice Program Product and Partner Recognition Activities” identified by EPA ICR No. 2691.01 and OMB Control No. 2070-[new]. This 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. 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.

Before submitting the consolidated ICR to OMB for review and approval, EPA is soliciting comments on specific aspects of the proposed information collection. Please note that if you take this opportunity to provide input, your name, affiliation, e-mail address, phone number and any information you provide (e.g., copies of e-mails) will be incorporated and attached to the ICR supporting statement, which will be a public document.

As a potential respondent, we would value your feedback on the following questions:

- I. Are the data that are required to be submitted under this ICR available from any other public source that you are aware of, or are they data already collected by another EPA office or by another agency? If so, where can you find the data?
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- information, including the validity of the methodology and assumptions used, reasonable and accurate?
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We will send a copy of the ICR tomorrow. For your reference, here is a link to the federal register notice: <https://www.federalregister.gov/documents/2021/06/28/2021-13683/agency-information-collection-activities-proposed-renewal-and-consolidation-of-currently-approved>.

If you have any comments in response to the above questions, or with respect to any other part of this ICR, please respond by return e-mail by August 2, 2021 to [rutsch.linda@epa.gov](mailto:rutsch.linda@epa.gov). EPA will consider those responses, as well as any public comment received in response to the Federal Register notice identified above, in preparing a final document for OMB review.

Thanks in advance for your time and assistance!

Kind regards,

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**Subject:** Help with the Safer Choice ICR

I have a favor to ask. I hope it isn't a large burden. We are writing to request your feedback on materials that describe how much time companies spend working with our program in terms of information collection activities.

The Paperwork Reduction Act (PRA) requires us to issue an Information Collection Request (ICR) through a public notice and comment process. On Monday, June 28<sup>th</sup>, we published and solicited comment through a Federal Register Notice explaining our work to renew and consolidate Safer Choice ICRs under the PRA. We are consolidating three ICRs for Safer Choice: product review and approval; consumer awareness survey; and Partner of the Year. The PRA also requires that we conduct consultations representing the views of those who work with the program. You have helped us with the ICR consultation process in the past, and we are hoping we can lean on you again.

The timing estimates in the draft ICR are based in large part on our experience working with our partners, our third parties, and our data system. Some estimates may be updated from the last time that you saw them, but adjustments are marginal. Please note that these estimates are for partnering in existing product categories – not for opening new categories.

Your responses could be quite brief if you continue to agree that our estimates reflect a reasonable estimate of the time partners take in working with our program.

In a few moments, will send a more detailed ask with links and questions. We would appreciate your feedback by August 2.

For visitors to EPA: [epa.gov/aboutepa/hq.html](http://epa.gov/aboutepa/hq.html)

For information on Safer Choice: [epa.gov/saferchoice](http://epa.gov/saferchoice)



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Comments received from the Household & Commercial Products Association  
(HCPA)

**From:**  
**To:**  
**Cc:**  
**Subject:** FW: Help with the Safer Choice ICR  
**Date:** Monday, August 30, 2021 8:09:55 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image012.png](#)  
[ATT00001.txt](#)  
[HCPA Safer Choice ICR Comments.pdf](#)

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**Warning from Abt:** External email. Be careful opening links and attachments.

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**Subject:** Re: Help with the Safer Choice ICR

I submitted the attached comments on the ICR last week (hopefully they came through the docket – I have a confirmation, if they did not) – which reflect that the cost estimates in the ICR are consistent with our experiences, primarily the PotY portion.

Thanks



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**Subject:** FW: Help with the Safer Choice ICR

Hi,

Thanks for calling the other day.

If I understand correctly, you don't have comments on the ICR and the estimates seem generally in line with real-world values.

If I understand this correctly, could you please reply to me and Linda and let us know that that is the case?

Thanks so much. It would be really helpful to us.

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**Subject:** RE: Help with the Safer Choice ICR

Dear ,

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Thanks in advance for your time and assistance!

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#EPASaferChoice



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In a few moments, will send a more detailed ask with links and questions. We would appreciate your feedback by August 2.

Thanks very much,



August 27, 2021

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)

On behalf of the Household & Commercial Products Association<sup>1</sup> (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

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<sup>1</sup> 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, consisting of a series of loops and a long horizontal stroke extending to the right.

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