

Consultation Questions for ICR Renewals

(1) Publicly Available Data

(A) Is the data that the Agency seeks available from any public source, or already collected by another office at EPA or by another agency? **No for specific refiller / registrant reporting data required to meet the regulatory requirements. For those refiller locations that participate, the American Agronomic Stewardship Alliance (AASA) inspections provide a reference opportunity for container and containment status at the time of the audit. CropLife America does provide refillable container cleaning and compliance/educational materials.**

(B) If yes, where can you find the data? (Does your answer indicate a true duplication, or does the input indicate that certain data elements are available, but that they don't meet our data needs very well?)

(2) Frequency of Collection

Can the Agency collect the information less frequently and still produce the same outcome? **Corteva supports the current requirement for collection at a data call-in request and/or during an on-site inspection.**

(3) Clarity of Instructions

The ICR is intended to require that respondents keep certain data so that the Agency can utilize them.

(A) Based on the instructions (regulations, PR Notices, etc.), is it clear what you are required to do and what records to keep? **Yes.** If not, what suggestions do you have to clarify the instructions?

(B) There is no required recordkeeping format. Does this make it difficult to comply with the requirements in the container-containment rule?

Corteva supports the development of a consistent format for both container and containment compliance record keeping requirements. There is a containment inspection form example online provided by the MN Dept of Agriculture.

(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 is that, at the present time, the Agency is unable to ensure the security of CBI that might be transmitted over the Internet.

(A) What do you think about electronic alternatives to paper-based records?

Corteva supports electronic record keeping efforts as an option for both refillers and for registrants. Electronic record keeping may provide improved data consistency and may support compliance efforts with reminders for needed activity or other helpful information. Electronic records may also be easier to provide during an inspection or for a data call-in.

(B) Are you keeping your records electronically? If yes, in what format?

Yes. Within proprietary software/applications.

(5) Burden and Costs

(A) Are the labor rates accurate?

The provided labor rates appear appropriate.

(B) The Agency assumes there is no capital cost associated with this activity for registrants and a small capital cost for refillers. Is that correct? **Registrants may also incur a small cost for computer hardware and software needed for compliance. This compliance would likely not be a separate expense, but part of other business activity.**

(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? **The estimated burden hours and labor rates appear appropriate.**

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.

(D) Are there other costs that should be accounted for that may have been missed? **None identified at this time.**

EPA Statement to Stakeholders during consultation:

"We are writing to you today to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the ICR for the Standards for Pesticide Containers and Containment. As part of our consultation process, we are requesting comments from industry on this ICR renewal proposal."