

Information Collection Request (ICR)
Safety Standard for Walk-Behind Lawn Mowers
Supporting Statement
OMB Control Number 3041-0091

A. Justification

1. Information to be collected and circumstances that make the collection of information necessary

The Safety Standard for Walk-Behind Power Lawn Mowers (16 CFR 1205) was issued on February 15, 1979. The labeling requirements of the Standard became effective on December 31, 1979, while the performance requirements became effective on June 30, 1982. The Standard was issued under the authority of Sections 7 and 9 of the Consumer Product Safety Act (CPSA) (15 U.S.C. 2056 and 2058).

The Standard is intended to reduce the risk of injury to consumers caused by contact, primarily of the hand and foot, with the rotating blade of the mower. To comply with the Standard, manufacturers must assure that each mower model meets specified performance criteria listed under the Standard. In addition to the Standard, a Certification Rule which requires the maintenance of records, was issued under Section 14(a) of the CPSA [15 U.S.C. 2063(a)]. Under Section 14(a), manufacturers must issue certificates that the product complies with the Standard and base that certificate on a test of each product or on a "reasonable testing program." The certification rule requires manufacturers (including importers) to also establish and maintain written records which show that the certificates of compliance issued are based on a test of each mower or on a reasonable testing program. The records are to be maintained for a period of at least three years from the date of certification of each mower or each production lot. The certification rule (See 1205.35(a, b) also requires that the certificates be in the form of a label on the product stating (1) "Meets CPSC blade safety requirements"; (2) an identification of the production lot; (3) the name of the person or firm issuing the certificate; (4) the location where the product was principally assembled; and (5) the month and year the product was manufactured.

2. Use and sharing of collected information

The required recordkeeping is used to assure compliance with the standard. The records are maintained by the firm or the firm's resident agent and made available to a designated officer or employee of the Commission at his or her request. The lack of written test records would require an increase in Federal Government inspections and sample collections for testing to determine the industry's compliance with the Standard.

3. Use of information technology (IT) in information collection

If needed, information can be submitted electronically to RegulatoryEnforcement@cpsc.gov.

4. Efforts to identify duplication

No other U.S. agency has similar requirements for lawn mowers. No similar information regarding the compliance status of individual lawn mower models is available.

5. Impact on small businesses

Based on current knowledge of the industry, smaller firms will have an overall lesser burden of testing and recordkeeping due to the lower number of lawn mower models and/or production lots manufactured.

CPSC provides a variety of resources to help both new and experienced small businesses learn about safety requirements that apply to consumer products, including the CPSC Regulatory Robot and small business education videos. Many of these resources can be accessed online at:

<https://www.cpsc.gov/Business--Manufacturing/Small-Business-Resources>.

6. Consequences to Federal program or policy activities if collection is not conducted or is conducted less frequently

The rule does not require any particular frequency of records, only that records be kept of the tests required by 15 U.S.C. 2063. If these records were not kept, the purpose explained in Item (2) above would not be achieved.

7. Special circumstances requiring respondents to report information more often than quarterly or to prepare responses in fewer than 30 days

None.

8. Agency's Federal Register Notice and related information

A Federal Register Notice announcing the agency's proposed request for a renewal of approval was published on September 23, 2025. 90 FR 45751. The Commission received four public comments. Three comments were out of scope. The fourth commenter, Outdoor Power Equipment Institute (OPEI), asserted that CPSC's burden estimates are low because CPSC does not account for manufacturers that may be producing mowers all year-round.

CPSC's estimated burden assumes 130 yearly production days, based on a highly seasonal production period. OPEI agrees that this is true for some manufacturers. However, OPEI asserts that there are other manufacturers, without specifying how many, who are in production for an estimated 250 business days all year-round. Some firms may have more than 130 yearly production days, even up to 250 business production days, as suggested by OPEI, and others may have fewer production days. OPEI has not provided any detailed information that will assist in revising the estimated PRA burden. For this reason, CPSC is not revising its current burden estimates based on 130 days of production per year.

OPEI also expressed concerns about potential duplicative burdens associated with e-filing requirements under a new rule, Certificates of Compliance. See 16 CFR 1110. The PRA burden associated with the e-filing requirements for walk-behind lawn mowers is accounted for in the final e-filing rule. 90 FR 1800, 1839 (Jan. 8, 2025).

9. Decision to provide payment or gift

Not applicable.

10. Assurance of confidentiality

Records cited as being confidential remain confidential in accordance with procedures issued under the Freedom of Information Act (5 U.S.C. 522). 16 C.F.R. Subpart B.

11. Questions of a sensitive nature.

Not applicable.

12. Estimate of hour burden to respondents

Based on a review of readily available market data, CPSC estimates approximately 34 lawn-mower suppliers will respond to the collection annually. Based on subject matter knowledge and previous experience during compliance inspections conducted for lawn mowers subject to the standard, we estimate that each PRA respondent expends eight hours daily engaged in testing required by PRA and used to certify a production lot of lawn mowers. This may involve testing approximately five to six lawn mowers per day and recording test results in some form of a retrievable record system, though each PRA respondent may manage their program differently. CPSC assumes testing is performed over 130 estimated yearly production days, on average, though some firms may test more and others less. Thus, total hour burden to respondents is estimated to be 1,040 hours per respondent (8 hours per day × 130

days), and total annual burden for the industry is estimated to be 35,360 hours (34 respondents × 1,040 hours).

The rule also requires that information be included on permanent labels attached to the lawn mowers. This label serves as a certificate of compliance with the rule. The label must include identification of the production lot; the name of the person or firm issuing the certificate; the location where the product was principally assembled, and; the month and year the product was manufactured. Because this information is information that the manufacturer would be expected to develop during the design, testing, and manufacturing process, the information should be readily available and it could take a manufacturer an additional hour per production day to collect the information and place it on the label. Therefore, an additional 130 hours per respondent have been added to the total burden. For the estimated 34 annual respondents, total estimated additional burden related to labeling is 4,420 hours.

Total annual burden hours related to testing, recordkeeping, and labeling are estimated to be 39,780 hours for the collection of information annually (35,360 + 4,420).

The burden cost of the collection of information related to testing is estimated to be \$2,729,438.40 based on 35,360 hours × \$77.19 (total compensation for management, professional, and related workers in goods-producing industries) and annual cost burden related to labeling is estimated to be \$183,827.80 based on 4,420 hours × \$41.59 (total compensation for all sales and office workers in goods-producing industries).¹ Therefore, total annual burden costs related to the information collection are estimated to be \$2,913,266 (\$2,729,438.40 + \$183,827.80). However, this may over-estimate the burden costs of the collection, because it may be incorrect to assume the estimated burden is paid at a U.S. wage rate.

13. Estimates of other total cost burden to respondents or recordkeepers

There are no costs to respondents beyond those presented in A.12. There are no operating, maintenance, or capital costs associated with the collection.

14. Estimate of annualized costs to the federal government

During a typical year, the Commission will expend approximately two weeks (or 80 hours) of professional staff time reviewing records required to be maintained by the certification regulations for walk-behind power mowers. Estimated cost to the federal government is based on performance of the work by employees paid at a GS-12 Step 5 pay rate of \$55.07 per hour.² According to the most recent Employer Costs for Employee Compensation, this represents approximately 67.6 percent of civilian

¹ U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2025, Table 4, https://www.bls.gov/news.release/archives/ecec_06132025.pdf.

² 2025 General Schedule (GS) Locality Pay Tables for Washington-Baltimore-Northern Virginia.

compensation for management, professional and related occupational groups.³ Therefore, total hourly compensation for an employee at the GS-12 Step 5 pay rate is approximately \$81.46, including benefits. The annual cost to the federal government of the collection of information is therefore estimated to be about \$6,516.80 (\$81.46 × 80 hours).

15. Program changes or adjustments

No change has been made to the collection of information in the Safety Standard for Walk-Behind Lawn Mowers since it was last approved by OMB. Cost estimates are updated with the latest compensation data. Based on readily available market data, the number of respondents to the collection increased from 29 to 34.

16. Plans for tabulation and publication

Not applicable.

17. Rationale for not displaying the expiration date for OMB approval

Not applicable.

18. Exception to the certification statement

Not applicable.

B. Collection of Information Employing Statistical Methods

Not applicable.

³ U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2025, Table 2. https://www.bls.gov/news.release/archives/ecec_06132025.pdf