

Attachment A: Stakeholder Consultation Email and Questions

EPA sent the following email and consultation questions to stakeholders Ecolab, Syngenta, the PRIA Coalition, Lallemand Plant Care, Pyxis Regulatory Consulting, Clorox, Bengal Labs, Synergy, and Albaugh LLC.

From:

To:

Subject: Consultation: Bilingual Labeling Tracking ICR

Date: Wednesday, July 23, 2025 10:37:07 AM

Attachments: [Consultation Questions_2070-NEW.docx](#)

[Consultation Forms - Syngenta.pdf](#)
[image001.png](#)

[image002.png](#)
[image003.png](#)

Good morning:

I am contacting you to solicit your input on a new Information Collection Request (ICR) (see attached questions). This ICR was developed under the Pesticide Registration Improvement Act (PRIA) and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) titled “Bilingual Pesticide Labeling Tracking,” identified by OMB Control No. 2070-NEW. OMB requires federal agencies to consult with nine or fewer potential respondents prior to submitting the ICR renewal to OMB for review and approval. This consultation requirement is in addition to providing the public with 60 days to comment on the proposed collection activity. The notice announcing the ICR renewal and solicitation of comments was published in the **Federal Register** on July 21, 2025, ([90 FR 34269](#)) See <http://www.regulations.gov/>, docket ID EPA-HQ- OPP-2025-0049, and the ICR supporting statement for this renewal located is in that docket for additional information.

The Paperwork Reduction Act (PRA) requires that agencies receive Office of Management and Budget (OMB) clearance before requesting most types of information from the public. In order to receive OMB clearance, federal agencies prepare draft ICRs providing an overview of the information collection and estimates of the cost and time for the public to respond. The agencies consult with potential respondents and the public about the ICR and, where appropriate, incorporate comments received. The draft ICR is then sent to OMB for its review and approval. These ICRs are periodically renewed.

This is a new information collection activity that covers the paperwork burden for the tracking the adoption of bilingual labeling of pesticide products. This ICR was developed as part of a requirement by the PRIA. PRIA was enacted in 2004 and established a new system for registering pesticides including fees and guaranteed decision times, along with funding for farmworker protection activities. PRIA was reauthorized in 2007, 2012, 2019, and most recently on December

29, 2022 (PRIA 5). PRIA 5 amended the FIFRA to require bilingual language translation for sections of the end-use pesticide product labels where translation is available in the EPA Spanish Translation Guide for Pesticide Labeling (or the Spanish Translation Guide). PRIA 5 requires that each registered pesticide product released for shipment include either the bilingual language translation for sections of the labeling contained in EPA's Spanish Translation Guide for Pesticide Labeling on the pesticide product container, or a link to such translation via scannable technology or other electronic methods readily accessible on the product label.

Please provide responses back by EPA by Wednesday, August 6, 2025.

Consultation Questions for “Bilingual Pesticide Labeling Tracking”

(1) Publicly Available Data

- A. Is the information/data required by PRIA 5 available from any public source, or already collected by another office at EPA or by another agency?
 - 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 information collection request data needs as required by PRIA 5?)
-

(2) Clarity of Instructions

- A. The ICR is intended to inform EPA about whether respondents are in compliance with the PRIA 5 bilingual labeling requirements. The revised MyPeST application interface would be designed so that the tile with the list of products would also contain information about the pesticide product type and a space to indicate whether each product is in compliance with bilingual labeling requirements. This would allow the Agency to more easily determine the extent of compliance (i.e., the percentage of RUPs with the required bilingual labeling).
 - B. Based on the instructions (form instructions, statute, PR Notices, etc.), is it clear what you are required to do and how to submit such data? If not, what suggestions do you have to clarify the instructions?
 - C. Based on the instructions, how much effort (high/medium/low) did it take to complete the bilingual labeling question on the MyPeST application? Are there ways to streamline reporting while still indicating to EPA which of your products are in compliance?
-

(3) Electronic Reporting and Record keeping

- A. Are you interested in pursuing reporting via MyPeST rather than a form that must be filled out manually and returned via email?
- B. What benefits would submission via MyPeST bring you in terms of burden reduction or greater efficiency in compiling the information?

(4) Burden and Costs

- A. The labor rates the Agency uses are based on the most recently available BLS NAICS fully loaded wage hourly rates (includes benefits and overhead by occupation as appropriate) by industry occupation. Are the labor rates accurate?
- B. The Agency assumes there are no capital costs associated with this activity. Is that correct?
- 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 to report on the burden to comply with the requirements under PRIA 5 accurate? If you provide burden (time) and cost estimates that are substantially different from EPA's, please provide an explanation of how you arrived at your estimates.