

## **Attachment B: Response Received to Stakeholder Consultation Questions**

*EPA received the following email and answers in response to its consultation.*

**From:**

**To:**

**Subject:** RE: Consultation: Bilingual Pesticide Labeling Tracking ICR

**Date:** Wednesday, August 6, 2025 11:52:33 AM

**Attachments:**

[image004.p](#)

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[image005.p](#)

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**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good morning,

Please see our response to the consultation questions in the attached. If you would prefer to receive this through a different method, please let me know. Additionally, if any questions arise, please do not hesitate to reach out.

Regards,

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**P Y X I S REGULATORY CONSULTING, INC.**

## Consultation Questions for “Bilingual Pesticide Labeling Tracking”

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### (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?

Yes, but it is dependent on other factors.

- 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?)

If a registrant subscribes to both TELUS and CDMS, they should have access to some of the relevant information. However, it is the registrant's responsibility to ensure that this information is kept up to date. It is important to note that labels and SDSs available on these platforms may occasionally be inaccurate or outdated. They are dependent on registrant's updating this information with the last approved label available commercially which may differ than what is publicly available as an EPA stamped approved label on an EPA website, e.g., PPLS or APPRIL.

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### (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?

The instructions are generally clear, though we found it necessary to reread them a few times to fully understand the data submission process. It may be helpful to present the list of product types that are not required to comply with PRIA 5 bilingual labeling—such as MUPs or products in toxicity categories not yet subject to compliance—more prominently and in a bulleted or checklist format. Presenting this information upfront,

rather than embedded within a longer paragraph, could improve clarity and support more accurate data reporting to the EPA.

Additionally, incorporating a step-by-step checklist format along with annotated screenshots (e.g., arrows or highlights) would enhance usability. The section that describes selecting checkboxes in the left-hand column and affirming the certification statement was somewhat lengthy and initially confusing. Breaking this into clearer, visual steps could streamline the process for users.

- 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?

The actual effort required to complete the bilingual labeling section in the MyPeST application is minimal. While the task primarily involves selecting checkboxes, the accompanying instructions may give the impression that the process is more complex than it truly is.

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### **(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?

Yes; however not everyone or every company has adopted the MyPeST application. Some company contacts may still require this information to be sent through email.

- B. What benefits would submission via MyPeST bring you in terms of burden reduction or greater efficiency in compiling the information?

We believe the electronic reporting system is efficient at this stage. However, for some of our clients, our access to bilingual labeling and recordkeeping reports is limited due to our roles as Consultants rather than Company Administrators or Company Representatives. Additionally, not all companies have fully adopted the use of MyPeST. The Agency must keep in mind that the concept is still new to many companies.

It may be advisable to consider granting Consultants access to these reporting functions. In the event the designated Company Administrator or Representative is unavailable, Consultants could report on behalf of the company which would help ensure continuity and compliance.

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#### (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?

Pyxis is unable to comment.

- A. The Agency assumes there are no capital costs associated with this activity. Is that correct?

This is correct.

- A. 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.