

Attachment E**Respondent and Agency Burden Tables**

The following document contains all supporting calculations for the summary tables of agency and respondent burden found in the supporting statement. It is important to note that the summary values in the columns of the tables may not sum to the totals indicated due to rounding. Additionally, the described collection activities vary for each information collection (IC). All information collections represented by this ICR can be submitted electronically via the Pesticide Submission Portal (PSP) through EPA's Central Data Exchange (CDX).

The supporting calculations in this document were based on the longstanding burden estimations used for each information collection activity and updated to reflect current estimated number of responses and wages. The expected number of respondents for many of these ICs, is the total number of current pesticide registrants. As a proxy for the current number of active pesticide registrants, EPA used an average of the total number of companies paying Pesticide Registration Maintenance Fees annually over the past three years, 1,832 companies. Very few of these companies will register new active ingredients or new uses in any since year, so for most of the Information Collection (IC) groups, the estimated number of responses were determined by using an annual average of the number of submissions to EPA over the most recent three years (2022 to 2024). For the notice of supplemental distribution of a registered pesticide product (IC 16), recent estimates of the number of submissions and supplemental distributors were not available, so a historical estimate was used in instead.

Additionally, the total number of pesticide registrants is not an appropriate proxy of the maximum possible number of respondents for two IC groups, notice of pesticide registration by states to meet a Special Local Need under FIFRA Section 24(c) (IC 10) and application for emergency exemption for pesticides FIFRA Section 18 (IC 11). For IC 10 and 11, while there are over 50 U.S. states and territories, in recent years, EPA has received submissions from about 30.

RESPONDENT BURDEN

Information Collection (IC)		Number of Respondents	Number of Responses	Response per Respondent	Annual Burden (hours)	Total Cost (\$)
1	Application for an EUP -- Chemical Pesticides	4	6	1.50	198	\$13,075
2	Application for an EUP -- Emerging Technology Pesticides	8	10	1.25	1,470	\$104,078
3	Emerging Technology Pesticides - Substantiation of Confidential Business Information Claims	25	25	1.00	538	\$46,341
4	Emerging Technology Pesticides -- Adverse Effects Reporting	1	1	1.00	7	\$577
5	Developer Burden per Plant Incorporated Protectant Exemption	10	10	1.00	850	\$111,555
6	"Type A" application for registration of a new active ingredient or a new use for a currently registered active ingredient	1,832	172	0.09	33,368	\$2,594,892
7	"Type B" application for registration of a new or amended product that contains a currently registered active ingredient	1,832	6,493	3.54	90,902	\$9,337,710
8	"Type C" application for registration of new conventional active ingredients or uses that may qualify as "reduced risk" chemicals and/or OP replacements	1,832	10	0.01	6,460	\$520,329
9	Data generation for new AIs and new products	1,832	795	0.43	1,583,524	\$118,767,495
10	Notice of pesticide registration by states to meet a Special Local Need under FIFRA Section 24(c)	14	220	15.71	11,440	\$972,286
11	Application for emergency exemption for pesticides FIFRA Section 18	17	73	4.29	7,227	\$459,792
12	FIFRA Section 6(a)(2) Incident submissions	1,832	136,119	74.30	322,602	\$23,709,115
13	FIFRA Section 6(a)(2) Study submissions	1,832	730	0.40	2,373	\$168,456
14	FIFRA Section 6(a)(2) Training	1,832	21,984	12.00	25,465	\$1,533,829
15	Compliance requirement for child-resistant packaging	70	34	0.49	3,878	\$292,164
16	Notice of supplemental distribution of a registered pesticide product	2,000	2,000	1.00	640	\$59,803
17	Tolerance petitions for pesticides on food/feed crops and new inert ingredients	47	65	1.38	112,190	\$11,589,750
18	IR-4 Tolerance petitions for pesticides on food/feed crops and new inert ingredients	3	18	6.00	31,302	\$2,592,250
Total Respondent		15,023	168,765	125	2,234,433	\$172,873,497

Applications for Experimental Use Permits (EUPs) for Chemical and Emerging Technology Pesticides

IC 1: Response Burden Estimates per EUP Application for Chemical Pesticides					
Collection Activities	Burden Hours			Total	
	Management \$135.50 /hr	Technical \$74.28 /hr	Clerical \$29.50 /hr	Hours	Costs
Read regulations	1.3	1.3	0	2.6	\$273
Plan activities	0	2.5	0	2.5	\$186
Create information	0	3	2	5	\$282
Gather information	0	4.3	4	8.3	\$437
Compile and review	2	6	2	10	\$776
Complete paperwork	0.3	0.8	2	3.1	\$159
Store/maintain data	0	0.5	1	1.5	\$67
Total	3.6	18.4	11	33	\$2,179

IC 1 Annual Burden: EPA estimates 6 submissions per year for a total burden of **198 hours** at a cost of **\$13,075**.

IC 2: Response Burden Estimates per EUP Application for Emerging Technology Pesticides					
Collection Activities	Burden Hours			Total	
	Management \$135.50 /hr	Technical \$74.28 /hr	Clerical \$29.50 /hr	Hours	Costs
Read regulations	2	4	0	6	\$568
Plan activities	0	20	0	20	\$1,486
Create information	0	40	4	44	\$3,089
Gather information	0	6	8	14	\$682
Compile and review	4	40	4	48	\$3,631
Complete paperwork	1	8	4	13	\$848
Store/maintain data	0	1	1	2	\$104
Total	7	119	21	147	\$10,408

IC 2 Annual Burden: EPA estimates 10 submissions per year for a total burden of **1,470 hours** at a cost of **\$104,078**.

Emerging Technology Pesticides: Confidential Business Information (CBI) Substantiation and Adverse Effects Reporting

IC 3: Respondent Burden Estimates per Submission for Substantiation of CBI Claims Made in an Emerging Technology Pesticides Registration Application					
Collection Activities	Burden and Cost Estimates			Totals	
	Mgmt.	Tech.	Clerical	Burden	Costs
	\$135.50 /hr	\$74.28 /hr	\$29.50 /hr	(hrs)	(\$)
Read Regulations	1	2	0	3	\$284
Plan Activities	2	4	0	6	\$568
Gather Information	0	4	0	4	\$297
Review Information	2	1	1	4	\$397
Complete Paperwork	0	1	2	3	\$177
Submit Information	0.5	0.5	0.5	1.5	\$131
Total	5.5	12.5	3.5	21.5	\$1,854

IC 3 Annual Burden: EPA estimates 25 submissions per year for a total burden of **538 hours** at a cost of **\$46,341**.

IC 4: Average Respondent Burden and Cost Estimates per Submission for Submitting an Adverse Effects Report for an Exempt Emerging Technology Pesticides					
Collection activities	Burden and Cost Estimates			Totals	
	Mgmt.	Tech.	Clerical	Burden	Costs
	\$135.50 /hr	\$74.28 /hr	\$29.50 /hr	(hrs)	(\$)
Read Regulations	0.5	1	0	1.5	\$142
Plan Activities	0.5	0.5	0	1	\$105
Gather Information	0	1	0	1	\$74
Review Information	0.5	0.5	0	1	\$105
Complete Paperwork	0	0.5	1	1.5	\$89
Submit Information	0	0.5	0.5	1	\$63
Cost for Mailing	0	0	0	0	\$0
Total	1.5	4	1.5	7	\$577

IC 4 Annual Burden: EPA estimates 1 submission per year for a total burden of **7 hours** at a cost of **\$577**.

Exemptions of Certain Plant-Incorporated Protectants (PIPs) Derived from Newer Technologies Rulemaking

IC 5: Total Estimated Burden and Cost per Exemption of Certain Plant-Incorporated Protectants (PIPs) Related Submission per Developer					
Collection Activities	Burden Hours			Total	
	Managerial	Technical	Clerical	Hours	Costs
	\$179.15	\$90.38	\$57.25		
Read Instructions	2	2	0	4	\$539
Plan activities	5	5	0	10	\$1,348
Gather/create information	20	20	0	40	\$5,391
Compile and review	10	10	0	20	\$2,695
Complete paperwork	0	5	0	5	\$452
Submit information	2	2	0	4	\$539
Store/maintain data	0.5	0.5	1	2	\$192
Third party disclosure	0	0	0	0	\$0
Total	39.5	44.5	1	85	\$11,155

IC 5 Annual Burden: EPA estimates 10 submissions per year for a total burden of **850 hours** at a cost of **\$111,555**.

Application for New and Amended Pesticide Registration (OMB No. 2070-0060)

The burden estimation below separates the paperwork burden of an application for a new or amended pesticide registration into three categories, Types A, B, and C. This section also includes the burden calculations for data generation for new active ingredients (AIs) and new products. "Type A" applications for registration include applications for registration of a new AI or a new use for a currently registered AI. "Type B" applications for registration include applications for registration of a new or amended product that contains a currently registered AI. "Type C" applications for registration include applications for registration of new conventional active ingredients or uses that may qualify as "reduced risk" chemicals. The paperwork burden from study data generation does not occur with all types of registrations, only those that require submission of data – new AIs, new uses, new products, and some label amendments. The majority of data required for registration of new uses are limited to residue chemistry studies necessary to establish a new tolerance which are covered by the Tolerance ICR (OMB No. 2070-0024), below as IC 17 and 18.

Additionally, applications for new and amended pesticide registrations are separated by category – antimicrobial, biopesticide, or conventional. Applications for registration of an antimicrobial AI or product are processed by the Antimicrobial Division (AD), biopesticide AIs or products are processed by the Biopesticides and Pollution Prevention Division (BPPD), and conventional AIs or products are processed by the Registration Division (RD).

IC 6,7, and 8: Applications per Year				
	AD	BPPD	RD	Total
"Type A"	5	25	142	172
"Type B"	1,746	605	4,142	6,493
"Type C"	0	0	10	10
Total	1,751	630	4,294	6,675

IC 6: Estimated Burden per "Type A" Registration Application					
Collection Activities, Type A	Burden Hours			Total	
	Managerial (\$/hr)	Technical (\$/hr)	Clerical (\$/hr)	Hours	Costs
	\$135.50	\$74.28	\$51.38		
Read Instructions	18	0	0	18	\$2,439
Plan activities	4	0	0	4	\$542
Gather/create information	0	120	0	120	\$8,914
Compile and review	4	8	0	12	\$1,136
Complete paperwork	0	0	30	30	\$1,541
Submit information	0	0	0	0	\$0
Store/maintain data	0	0	10	10	\$514
Third party disclosure	0	0	0	0	\$0
Total	26	128	40	194	\$15,087

IC6: Total Annual Burden and Cost by Division for "Type A" Registration Applications									
Labor Category	Wages (\$/hr)	AD		BPPD		RD		Total	
		Hrs.	Cost	Hrs.	Cost	Hrs.	Cost	Hrs.	Cost
Management	\$135.50	130	\$17,616	650	\$88,078	3,692	\$500,281	4,472	\$605,974
Technical	\$74.28	640	\$47,541	3,200	\$237,707	18,176	\$1,350,175	22,016	\$1,635,423
Clerical	\$51.38	200	\$10,276	1,000	\$51,380	5,680	\$291,839	6,880	\$353,495
Total		970	\$75,433	4,850	\$377,165	27,548	\$2,142,295	33,368	\$2,594,892

IC 7: Estimated Burden per "Type B" Registration Application/Notification					
Collection Activities, Type B	Burden Hours			Total	
	Managerial (\$/hr)	Technical (\$/hr)	Clerical (\$/hr)	Hours	Costs
	\$135.50	\$74.28	\$51.38		
Read Instructions	7	0	0	7	\$949
Plan activities	0.5	0	0	0.5	\$68
Gather/create information	0	1.5	0	1.5	\$111
Compile and review	0.5	0.5	0	1	\$105
Complete paperwork	0	0	3	3	\$154
Submit information	0	0	0	0	\$0
Store/maintain data	0	0	1	1	\$51
Third party disclosure	0	0	0	0	\$0
Total	8	2	4	14	\$1,438

IC 7: Total Annual Burden and Cost by Division for "Type B" Registration Applications									
Labor Category	Wages (\$/hr)	AD		BPPD		RD		Total	
		Hrs.	Cost	Hrs.	Cost	Hrs.	Cost	Hrs.	Cost
Management	\$135.50	13,968	\$1,892,721	4,840	\$655,840	33,136	\$4,490,063	51,944	\$7,038,623
Technical	\$74.28	3,492	\$259,398	1,210	\$89,883	8,284	\$615,364	12,986	\$964,644
Clerical	\$51.38	6,984	\$358,838	2,42	\$124,340	16,568	\$851,265	25,972	\$1,334,443

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Total Burden		24,444	\$2,510,957	8,470	\$870,062	57,988	\$5,956,691	90,902	\$9,337,710

IC 8: Estimated Burden/Cost per "Type C" Reduced Risk Registration Application					
Collection Activities, Type C	Burden Hours			Total	
	Managerial (\$/hr)	Technical (\$/hr)	Clerical (\$/hr)	Hours	Costs
	\$135.50	\$74.28	\$51.38		
Read Instructions	22	0	0	22	\$2,981
Gather Information	0	368	0	368	\$27,336
Process, Compile, and Review Info	80	80	0	160	\$16,783
Record and Report Info	0	0	72	72	\$3,699
Store, File, and Maintain Info	0	0	24	24	\$1,233
Total	102	448	96	646	\$52,033

IC 8: Total Annual Burden and Cost for "Type C" Registration Applications				
Labor Category	Wages (\$/hr)	RD		
		Applications/Year	Hours	Cost
Management	\$135.50	10	1,020	\$138,214
Technical	\$74.28	10	4,480	\$332,790
Clerical	\$51.38	10	960	\$49,325
Total			6,460	\$520,329

IC 9: Estimates of Paperwork Burden Hours from Data Generation for New AIs										
Division	Data Cost	Paperwork Cost	Managerial		Technical		Clerical		Total	
			Hours	FTEs	Hours	FTEs	Hours	FTEs	Hours	FTEs
AD	\$9,382,000	\$3,283,700	4,654	2.2	28,916	13.9	10,467	5	44,037	21.1
BPPD	\$5,097,000	\$1,783,950	2,528	1.2	15,708	7.6	5,686	2.7	23,922	11.5
RD	\$9,847,000	\$3,446,450	4,883	2.3	30,343	14.6	10,984	5.3	46,210	22.2

IC 9: Estimates of Paperwork Burden Hours from Data Generation for New Products										
Division	Data Cost	Paperwork Cost	Managerial		Technical		Clerical		Total	
			Hours	FTEs	Hours	FTEs	Hours	FTEs	Hours	FTEs
AD	\$113,900	\$39,865	56	0.03	346	0.17	125	0.06	527	0.26
BPPD	\$126,700	\$44,345	62	0.03	384	0.18	139	0.07	585	0.28
RD	\$210,700	\$73,745	103	0.05	639	0.31	231	0.11	973	0.47

IC 9: Estimates of Annual Paperwork Burden Hours and Cost from Data Generation for New AIs and New Products				
	Burden per Registration	Average Annual Responses	Average Annual Burden Hours	Average Annual Cost
New AIs				
Antimicrobial	44,037	3	132,111	\$9,851,100
Biochemical	23,922	25	598,050	\$44,598,750
Conventional	46,210	6	277,260	\$20,678,700
New Products				
Antimicrobial	527	325	171,275	\$12,956,125
Biochemical	585	50	29,250	\$2,217,250
Conventional	973	386	375,578	\$28,465,570
Total		795	1,583,524	\$118,767,495

Pesticide Program Public Sector Collections: Applications for Emergency Exemptions under FIFRA Section 18 and Notice of Pesticide Registration by States to Meet a Special Local Need Under FIFRA Section 24(c)

IC 10: FIFRA Section 24(c) Applicant Burden Estimates per Application					
Collection Activities	Burden per Application (hours)			Total	
	Managerial	Technical	Clerical	Hours	Costs
	\$135.50	\$74.28	\$51.38		
Gather data	5	12.5	0	17.5	\$1,606
Submit materials to state	9	5.5	1	15.5	\$1,679
Store/file/maintain the data	0	1	5	6	\$331
Totals	14	19	6	39	\$3,617

IC 10: FIFRA Section 24(c) Annual Applicant Burden Estimates					
Labor Category	Burden Hours per Application	Number of Applications	Total Annual Hours	Labor Rate (\$/hr.)	Total Annual Costs
Managerial	14	220	3,080	\$135.50	\$417,353
Technical	19	220	4,180	\$74.28	\$310,505
Clerical	6	220	1,320	\$51.38	\$67,822
Total	39		8,580		\$795,679

IC 10: FIFRA Section 24(c) Applicant (State Agency) Burden Estimates per Application					
Collection Activities	Burden per Application (hours)			Total	
	Managerial	Technical	Clerical	Hours	Costs
	\$93.55/hr	\$62.75/hr	\$44.13/hr		
Compile information	0	1	0	1	\$63
Review submission information	0	5.5	0	5.5	\$345
Complete and transmit paperwork to EPA ²	0	5.4	0.4	5.8	\$357
Store/file/maintain the data	0	0	0.1	0.1	\$4
Respond to registrant (if necessary)	0	0.4	0.2	0.6	\$34
Total	0	12.3	0.7	13	\$803

IC 10: FIFRA Section 24(c) Annual Applicant (State Agency) Burden Estimates					
Labor Category	Burden Hours per Application	Number of Applications	Total Annual Hours	Labor Rate (\$/hr.)	Total Annual Costs
Managerial	0	220	0	\$93.55	\$0
Technical	12.3	220	2706	\$62.75	\$169,811
Clerical	0.7	220	154	\$44.13	\$6,797
Total	13		2,860		\$176,607

IC 10: FIFRA Section 24(c) Annual Applicant (Registrant and State Agency) Burden Estimates					
Applicant	Burden Hours per Application	Number of Applications	Total Annual Hours	Cost per Application	Total Annual Costs
Registrant	39	220	8,580	\$3,617	\$795,679
State	13	220	2,860	\$803	\$176,607
Total	52	220	11,440	\$4,419	\$972,286

IC 11: FIFRA Section 18 - Applicant (State Government) Burden Hours and Labor Cost Estimates per Emergency

Exemption Request					
Collection activities	Burden per Application (hours)			Total	
	Managerial	Technical	Clerical	Hours	Costs (\$)
	\$93.55/hr	\$62.75/hr	\$44.13/hr		
Read FIFRA and FQPA requirements and CFR regulations	4	4	0	8	\$625.20
Process, compile, and review the requested data for accuracy and appropriateness	0	74	0	74	\$4,643.75
Generate application correspondence and follow-up summary report	0	15	0	15	\$941.30
Store/maintain/submit information	0	0	2	2	\$88.27
Totals	4	93	2	99	\$6,298.52

IC 11: FIFRA Section 18 Annual Applicant (State Government) Burden Hours and Labor Cost Estimates					
Labor Category	Burden Hours per Application	Number of Applications	Total Annual Hours	Labor Rate (\$/hr.)	Total Annual Costs
Managerial	4	73	292	\$93.55	\$27,316
Technical	93	73	6789	\$62.75	\$426,033
Clerical	2	73	146	\$44.13	\$6,444
Totals	99	73	7,227		\$459,792

Submission of Unreasonable Adverse Effects Information Under FIFRA 6(a)(2) – Incident Submissions, Study Submissions, and Training

IC 12: Respondent Burden and Cost Estimates per Submission - Incidents					
Collection Activities	Burden Hours (per study) by Labor Category			Total	
	Managerial	Technical	Clerical	Hours	Costs (\$)
	\$135.50/hr	\$74.28/hr	\$51.38/hr		
Read Instructions	0	0.1	0	0.1	\$7.43
Create Information	0	0.55	0	0.55	\$40.86
Compile and Review	0.25	0.6	0	0.85	\$78.45
Complete Paperwork	0	0	0.55	0.55	\$28.26
Store and Maintain Data	0	0.12	0.2	0.32	\$19.19
Total (per incident)	0.25	1.37	0.75	2.37	\$174.18

IC 12: Annual Respondent Burden and Cost Estimates – Incidents					
Labor Category	Burden Hours per Request	Number of Submissions	Total Annual Hours	Labor Rate (\$/hr)	Costs (\$)
Managerial	0.25	136,119	34,030	\$135.50	\$4,611,169
Technical	1.37	136,119	186,483	\$74.28	\$13,852,593
Clerical	0.75	136,119	102,089	\$51.38	\$5,245,353
Total (per year)	2.37	136,119	322,602		\$23,709,115

IC 13: Respondent Burden Estimates per Submission – Studies					
Collection Activities	Burden Hours (per study) by Labor Type			Total	
	Managerial	Technical	Clerical	Hours	Costs (\$)
	\$135.50/hr	\$74.28/hr	\$51.38/hr		
Read Instructions	0.1	0.2	0	0.3	\$28.41
Create Information	0	1	0	1	\$74.28
Compile and Review	0.1	0.55	0	0.65	\$54.41
Complete Paperwork	0	0.1	0.5	0.6	\$33.12
Store and Maintain Data	0	0.2	0.5	0.7	\$40.55
Total (per study)	0.2	2.05	1	3.25	\$230.76

IC 13: Annual Respondent Burden Estimates – Studies					
Labor Category	Burden Hours per Request	Number of Submissions	Total Annual Hours	Labor Rate (\$/hr)	Costs (\$)
Managerial	0.2	730	146	\$135.50	\$19,784
Technical	2.05	730	1,497	\$74.28	\$111,165
Clerical	1	730	730	\$51.38	\$37,507
Total (per year)	3.25	730	2,373		\$168,456

IC 14: Registrant Burden and Cost Estimates for Training Activities								
Training Activity	Burden Hours by Labor Category			Total (per activity)		Expected Activities each Year	Total Annual Burden and Costs	
	Managerial	Technical	Clerical	Hours	Costs (\$)		Hours	Costs (\$)
	\$135.50	\$74.28	\$51.38					
Plan Training	0.5	0.1	0.0	0.6	\$75.18	1,832	1,099	\$137,730
Conduct Employee Training	0.5	1.5	1.0	3.0	\$230.56	1,832	5,496	\$422,381
Take Employee Training	0.0	0.0	1.0	1.0	\$51.38	18,320	18,320	\$941,283
Follow-up, Tracking	0.0	0.1	0.2	0.3	\$17.70	1,832	550	\$32,434
Total (per year)	1.0	1.7	2.2	4.9	\$374.82	23,816	25,465	\$1,533,829

ICs 12, 13, and 14: Studies, Incidents, and Training Annual Respondent Burden					
Collection Activities	Per Submission Estimates		Total Submissions Expected per Year	Totals	
	Burden Hours	Costs (\$)		Burden Hours	Costs (\$)
Incidents	2.37	\$174.18	136,119	322,602	\$23,709,115
Studies	3.25	\$230.76	730	2,373	\$168,456
Training	4.9	\$374.82	23,816	25,465	\$1,533,829
Total			24,546	350,439	\$25,411,400

Compliance Requirement for Child Resistant Packaging (CRP)

IC 15: CRP Certification with Data, Estimated Respondent Burden					
Collection Activities	Burden Hours			Totals	
	Managerial	Technical	Clerical	Burden	Cost
	\$135.50/hr	\$74.28/hr	\$51.38/hr	Hours	
Read instructions	0	0.25	0	0.25	\$18.57
Plan activities	0	0.5	0	0.5	\$37.14
Gather CRP certification information	0	0.25	0	0.25	\$18.57
Generate & gather CRE/SAUE study data & prepare final report	13	72	28	113	\$8,548.60
Process, compile, and complete certification package	0	1.5	0.5	2	\$137.12
Review submission	0	0.5	0.5	1	\$62.83
Submit, file, or maintain CRP certification package and CRE/SAUE study final report with data	0	0	1	1	\$51.38
Total	13	75	30	118	\$8,874.21

IC 15: CRP Certification Without Data, Estimated Respondent Burden					
Collection Activities	Burden Hours			Totals	
	Managerial	Technical	Clerical	Burden	Cost
	\$135.50/hr	\$74.28/hr	\$51.38/hr	Hours	
Read instructions	0	0.25	0	0.25	\$18.57
Plan activities	0	0.5	0	0.5	\$37.14
Gather CRP certification information	0	0.25	0	0.25	\$18.57
Generate or obtain CRE/SAUE study data & final report	13	72	28	113	\$8,548.60
Process, compile, and complete certification package	0	1.5	0	1.5	\$111.43
Review submission	0	0.5	0.5	1	\$62.83
Submit CRP certification package; file or maintain package and CRE/SAUE study final report with data	0	0	0.5	0.5	\$25.69
Total	13	75	29	117	\$8,822.83

IC 15: CRP Exemption Request, Estimated Respondent Burden				
Collection Activities	Burden Hours		Totals	
	Technical	Clerical	Burden	Cost
	\$74.28 /hr	\$51.38 /hr		
Read instructions	0.25	0	0.25	\$18.57
Plan activities	0.5	0	0.5	\$37.14
Create information including electronic format of data	0.25	0	0.25	\$18.57
Gather Data to support Exemption	2.5	0	2.5	\$185.71
Process, compile, and complete written compliance document	2	0.5	2.5	\$174.26
Review submission	0.5	0.5	1	\$62.83
Store, submit, file, or maintain data	0	1	1	\$51.38

Total	6	2	8	\$548.46
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IC 15: Estimated Annual Respondent Burden					
Type of Response	Burden Hours per Response	Cost per Response	Number of Responses	Total Annual Burden Hours	Total Annual Cost
CRP certification with data	118	\$8,874.21	9	1,062	\$79,868
CRP certification without data	117	\$8,822.83	24	2,808	\$211,748
CRP exemption request	8	\$548.46	1	8	\$548
Total				3,878	\$292,164

Notice of Supplemental Distribution of a Registered Pesticide Product

IC 16: Estimated Respondent Burden per Supplemental Distribution Application					
Collection Activities	Burden Hours			Total	
	Managerial, \$/hr	Technical, \$/hr	Clerical, \$/hr	Hours	Costs
	\$135.50/hr	\$74.28/hr	\$51.38/hr		
Read instructions	0.08	0	0	0.08	\$10.84
Process, compile, review information for accuracy and appropriateness	0.05	0	0	0.05	\$6.78
If necessary, obtain an EPA company number for the supplemental distributor	0	0	0.08	0.08	\$4.11
Complete and submit EPA Form 8570-5	0.03	0	0	0.03	\$4.07
Store, file, or maintain information	0	0	0.08	0.08	\$4.11
Total	0.16	0	0.16	0.32	\$29.90

IC 16: Average Annual Burden		
Burden	Number of Responses	Total
0.32 hours	2,000	640 hours
\$29.90		\$59,803

Tolerance Petitions for Pesticides on Food/Feed Crops and New Inert Ingredients

IC 17: Petitioner Burden Estimates Per Response					
Collection Activities	Burden Hours			Total	
	Managerial, \$/hr	Technical, \$/hr	Clerical, \$/hr	Hours	Costs
	\$179.15	\$90.38	\$57.25		
Review FFDCA regulations CFR citation; PRN 97-1	25	48	24	97	\$10,191
Conduct Field Trial	252	1,080	25	1357	\$144,184
Prepare Petition	42	30	116	188	\$16,877
Read Notice of any petition deficiency	1	1	1	3	\$327
Prepare response	2	44	12	58	\$5,022
Maintain information	1	8	14	23	\$1,704
Total	323	1,211	192	1,726	\$178,304

IC 17: Annual Burden					
	Hours	\$/hour	Number of Petitions	Total (Hours)	Total (\$)
Management	323	\$179.15	65	20,995	\$3,761,275
Technical	1,211	\$90.38	65	78,715	\$7,114,000
Clerical	192	\$57.25	65	12,480	\$714,475
Total				112,190	\$11,589,750

IC 18: IR-4 Burden Estimates Per Petition Per Response					
Collection Activities	Burden Hours			Total	
	Managerial, \$/hr	Technical, \$/hr	Clerical, \$/hr	Hours	Costs
	\$147.84	\$70.94	\$43.93		
Review FFDCA regulations CFR citation; PRN 97-1	25	48	24	97	\$10,191
Conduct Field Trial	252	1,080	25	1357	\$144,184
Prepare Petition	55	30	116	201	\$19,206
Read Notice of any petition deficiency	1	1	1	3	\$327
Prepare response	2	44	12	58	\$5,022
Maintain information	1	8	14	23	\$1,704
Total	336	1,211	192	1,739	\$180,632.82

IC 18: Annual Burden					
	Hours	\$/hour	Number of Petitions	Total (Hours)	Total (\$)
Management	336	\$147.84	18	6,048	\$894,107.75
Technical	1,211	\$70.94	18	21,798	\$1,546,335.64
Clerical	192	\$43.93	18	3,456	\$151,806.90
Total				31,302	\$2,592,250.30

AGENCY BURDEN

IC Group	IC Description	Hours	Costs
1	Application for an EUP -- Chemical Pesticides		
2	Application for an EUP -- Emerging Technology Pesticides		
Subtotal		1,9146	\$169,349
3	Emerging Technology Pesticides - Substantiation of Confidential Business Information Claims		
4	Emerging Technology Pesticides -- Adverse Effects Reporting		
Subtotal		269	\$21,658
5	Developer Burden per Plant Incorporated Protectant Exemption		
Subtotal		50	\$4,277
6	"Type A" application for registration of a new active ingredient or a new use for a currently registered active ingredient		
7	"Type B" application for registration of a new or amended product that contains a currently registered active ingredient		
8	"Type C" application for registration of new conventional active ingredients or uses that may qualify as "reduced risk" chemicals and/or OP replacements		
9	Data generation for new AIs and new products		
Subtotal		369,408	\$33,199,685
10	Notice of pesticide registration by states to meet a Special Local Need under FIFRA Section 24(c)		
11	Application for emergency exemption for pesticides FIFRA Section 18		
Subtotal		22,880	\$1,974,787
12	FIFRA Section 6(a)(2) Incident submissions		
13	FIFRA Section 6(a)(2) Study submissions		
14	FIFRA Section 6(a)(2) Training [Not Applicable]		
Subtotal		34,147	\$2,723,437
15	Compliance requirement for child-resistant packaging		
Subtotal		256	\$19,579
16	Notice of supplemental distribution of a registered pesticide product		
Subtotal		1,435	\$123,794
17	IR-4 Tolerance petitions for pesticides on food/feed crops and new inert ingredients		
18	Tolerance petitions for pesticides on food/feed crops and new inert ingredients		
Subtotal		33,821	\$2,997,665
Grand Total		463,910	\$41,212,572

Applications for Experimental Use Permits (EUPs) for Chemical and Emerging Technology Pesticides

ICs 1 and 2: Annual Burden		
Labor Categories	Burden Hours	Wage Rate
Management	208	\$128.12
Technical	1,622	\$85.53
Clerical	83	\$47.22
Total Annual Burden Hours		1,914
Total Annual Costs		\$169,349

Emerging Technology Pesticides: Confidential Business Information (CBI) Substantiation and Adverse Effects Reporting

IC 3: Average Agency Burden Estimates per Submission for EPA Activities related to CBI Substantiation					
Activities	Burden Hours			Total	
	Managerial	Technical	Clerical	Burden (hrs)	Costs (\$)
	\$128.12 /hr	\$85.53 /hr	\$47.22 /hr		
Consult with Registrant	1	3	0.5	4.5	\$384
Record Submissions	0	0.5	1	1.5	\$89
Review Submissions	1	2	0	3	\$284
Store the Information	0	0.5	1	1.5	\$89
Total	2	6	2.5	10.5	\$845

IC 3: Annual Agency Burden EPA Activities related to CBI Substantiation			
Number of Submissions	Burden per Event		Total
	Hours	Costs	
25	10.5		262.5 hours
25		\$845	\$21,129

IC 4: Agency Burden per Submission for EPA Activities related to an Adverse Effects Report Submitted for an Exempt Plant-Incorporated Protectant					
Activities	Burden Hours			Totals	
	Managerial	Technical	Clerical	Burden (hrs)	Costs (\$)
	\$128.12 /hr	\$85.53 /hr	\$47.22 /hr		
Consult with Registrant	0.5	1	0.5	2	\$168
Record Submissions	0	0.5	1	1.5	\$89
Review Submissions	1	1	0	2	\$210
Store the Information	0	0.5	0.5	1	\$63
Total	1.5	3	2	6.5	\$529

IC 4: Annual Agency Burden Activities related to an Adverse Effects Report Submitted for an Exempt Plant-Incorporated Protectant			
Number of Submissions	Burden per Event		Total
	Hours	Costs	
1	6.5		6.5 hours
1		\$529	\$529

ICs 3 and 4: Annual Agency Burden					
	Per Submission Estimates		Total Annual Submissions	Totals	
	Burden (hrs)	Costs (\$)		Burden (hrs)	Costs (\$)
CBI Substantiation	10.5	\$845	25	262.5	\$21,129
Adverse Effects Reporting	6.5	\$529	1	6.5	\$529
Total				269	\$21,658

Exemptions of Certain Plant-Incorporated Protectants (PIPs) Derived from Newer Technologies Rulemaking

IC 5: Annual Agency Burden for Exemptions of Certain Plant Incorporated Protectants (PIPs) Derived from Newer Technologies					
Review Activities	Burden Hours			Total	
	Managerial	Technical	Clerical	Hours	Costs
	\$128.12	\$85.53	\$47.22		
Confirm eligibility and information requirements & updating website	0	50	0	50	\$4,277
Total	0	50	0	50	\$4,277

Application for New and Amended Pesticide Registration

ICs 6, 7, 8, and 9: Distribution of Agency FTEs Supporting FIFRA Section 3 Registration Activities							
Labor Categories	BEAD	RD	EFED	HED	AD	BPPD	Total FTEs
Managerial	1.8	8.7	3.7	5.3	3.2	1.6	24.3
Technical	8.9	49.3	14.7	28.5	20.9	24.1	146.4
Clerical	0.5	2.4	1.1	1.1	1.1	0.7	6.9
Total	11.2	60.4	19.5	34.9	25.2	26.4	177.6

ICs 6, 7, 8, and 9: Estimated Annual Agency Burden Hours and Costs Supporting FIFRA Section 3 Registration Activities					
Labor Categories	Total FTE	Hours per FTE	Total Hours	Hourly Wage	Total Annual Costs
Managerial	24.3	2,080	50,544	\$128.12	\$6,475,660
Technical	146.4	2,080	304,512	\$85.53	\$26,046,361
Clerical	6.9	2,080	14,352	\$47.22	\$677,664
Total	177.6		369,408		\$33,199,685

Pesticide Program Public Sector Collections: Applications for Emergency Exemptions under FIFRA Section 18 and Notice of Pesticide Registration by States to Meet a Special Local Need Under FIFRA Section 24(c)

IC 10: Total Annual Agency Burden for Section 24(c) Activities						
Labor Categories	FTEs	Hours / FTE	Total Burden Hours	Fully Loaded Wage (\$/hr.)	Annual per FTE Cost	Total Cost
Managerial	1	2080	2,080	\$128.12	\$266,488	\$266,488
Technical	2	2080	4,160	\$85.53	\$177,912	\$355,825
Clerical	1	2080	2,080	\$47.22	\$98,212	\$98,212
Total	4		8,320			\$720,525

IC 11: Annual Agency Burden for Section 18 Activities						
Labor Categories	FTEs	Hours / FTE	Total burden hours	Fully Loaded Wage (\$/hr.)	Annual per FTE Cost	Total Cost
Managerial	1	2,080	2,080	\$128.12	\$266,488	\$266,488
Technical	5	2,080	10,400	\$85.53	\$177,912	\$889,562
Clerical	1	2,080	2,080	\$47.22	\$98,212	\$98,212
Total	7		14,560			\$1,254,262

IC 10 and 11 Annual Burden: EPA estimates a total burden of 22,880 hours at a cost of \$1,974,787.

Submission of Unreasonable Adverse Effects Information Under FIFRA Section 6(a)(2) – Incident Submissions, Study Submissions, and Training

IC 12: Agency Burden per Submission - Incidents					
Collection Activities	Burden Hours per Submission by Labor Category			Total	
	Managerial	Technical	Clerical	Hours	Costs (\$)
	\$128.12/hr	\$85.53/hr	\$47.22/hr		
Screen Submitted Information	0	0.135	0	0.135	\$11.55
Record, File and Track Submissions	0	0.023	0.033	0.056	\$3.53
Communications, Guidance	0	0.025	0	0.025	\$2.14
Total (per incident)	0	0.183	0.033	0.216	\$17.21

IC 12: Annual Agency Burden Estimates - Incidents					
Labor Category	Burden Hours per Request	Number of Submissions	Total Annual Hours	Labor Rate (\$/hr)	Costs (\$)
Managerial	0	136,119	0	\$128.12	\$0
Technical	0.183	136,119	24,910	\$85.53	\$2,130,652
Clerical	0.033	136,119	4,492	\$47.22	\$212,097
Total (per year)	0.216	136,119	29,402		\$2,342,749

IC 13: Agency Burden Estimates per Submission - Studies					
Collection Activities	Burden Hours per Submission by Labor Category			Total	
	Managerial	Technical	Clerical	Hours	Costs (\$)
	\$128.12/hr	\$85.53/hr	\$47.22/hr		
Screen submitted information	0	2	0	2	\$171.07
Record, file, and track submissions	0	3.6	0.9	4.5	\$350.42
Total (per study)	0	5.6	0.9	6.5	\$521.49

IC 13: Annual Agency Burden Estimates - Studies					
Labor Category	Burden Hours per Request	Number of Submissions	Total Annual Hours	Labor Rate (\$/hr)	Costs (\$)
Managerial	0	730	0	\$128.12	\$0
Technical	5.6	730	4088	\$85.53	\$349,666
Clerical	0.9	730	657	\$47.22	\$31,022
Total (per year)	6.5	730	4,745		\$380,688

ICs 12 and 13: Annual Agency Burden and Cost Estimates

	Per Submission Estimates		Total Submissions Expected per Year	Totals	
	Hours	Costs (\$)		Burden Hours	Costs (\$)
Incidents	0.216	\$17.21	136,119	29,402	\$2,342,749
Studies	6.5	\$521.49	730	4,745	\$380,688
Total (per year)			136,849	34,147	\$2,723,437

Compliance Requirement for Child Resistant Packaging (CRP)

IC 15: Agency Burden by Response Type						
Collection Activities	CRP certification with data		CRP certification without data		Exemption Request	
	Technical \$/hr	Clerical \$/hr	Technical \$/hr	Clerical \$/hr	Technical \$/hr	Clerical \$/hr
	\$85.53	\$47.22	\$85.53	\$47.22	\$85.53	\$47.22
Hours per response, by labor type	8	3	1.5	0.5	40	3
Cost per response, by labor type	\$684	\$142	\$128	\$24	\$3,421	\$142
Annual number of responses	17		13		1	
Cost per response, by response type	11		2		43	
Total Annual Cost	\$826		\$152		\$3,563	

IC 15: Total Annual Burden		
Agency Burden	Total Burden Hours	Total Cost (\$)
CRP certification with data	187	\$14,041
CRP certification without data	26	\$1,975
CRP Exemption Request	43	\$3,563
Total Agency Burden and Cost	256	\$19,579

Notice of Supplemental Distribution of a Registered Pesticide Product

IC 16: Estimated Agency Burden per Supplemental Distribution Application					
Collection Activities	Burden Hours			Totals	
	Managerial, \$/hr	Technical, \$/hr	Clerical, \$/hr	Hours	Costs
	\$128.12	\$85.53	\$47.22		
If necessary, assign an EPA company number to the supplemental distributor ¹	0	0	0.08	0.027	\$1.26
Verify, acknowledge receipt ²	0	0	0.03	0.03	\$1.42
Initial product screening ³	0	0.36	0	0.036	\$3.08
Product review meeting ³	0.63	0	0	0.063	\$8.07
Process disapproved product distribution information ³	0	0.42	0	0.042	\$3.59
Process: Enter form information into electronic file in OPPIN	0	0.5	0	0.5	\$42.77
File and maintain information	0	0.02	0	0.02	\$1.71
Total	0.63	1.3	0.11	0.718	\$61.90

¹ Only expected to occur in one third of cases.

² This row fully covers the verification burden for 90% of cases.

³ 10% of forms require additional Agency review.

IC 16: Total Annual Agency Burden

Total		
Number of Responses	Hours	Costs
2,000	1,435	\$123,794

Tolerance Petitions for Pesticides on Food/Feed Crops and New Inert Ingredients

IC 17 and 18: Estimated Agency Burden for Tolerance Petitions, per Petition and Annual			
	Managerial	Technical	Clerical
Wages per Hour	\$128.12	\$85.53	\$47.22
Hours per FTE	2080	2080	2080
Cost per FTE	\$266,488	\$177,912	\$98,212
Estimated FTEs	1.572	14.256	0.432
Total Cost of FTEs	\$418,919	\$2,536,318	\$42,428
Total Annual Agency Burden	33,821		
Total Annual Agency Cost	\$2,997,665		