

Attachment C: Consultation Summary
(Stakeholder Response)

Attachment C:

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?

The data the Agency seeks is not available from any public source and is not already collected by another office at EPA. This data is submitted to The California Department of Pesticide Regulation but is not publicly available.

- 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 do not meet our data needs very well?)

(2) Frequency of Collection

Can the Agency collect the information less frequently and still produce the same outcome? *Not applicable. Data is only submitted once for review and used for registration decisions.*

(3) Clarity of Instructions

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

- B. Based on the instructions (regulations, 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?

EPA has made an effort to provide guidance and consolidate guidance documents so they are more accessible, however data requirements are dependent on multiple variables, and not all scenarios are addressed in these instructions. It is often difficult and time-consuming to get feedback from the agency on how these variables should be addressed.

- C. Do you understand that you are required to maintain records? *Yes*

- D.** Considering that there is no required submission format, is it difficult to submit information in ways that are clear, logical, and easy to complete? ***Yes, we support the voluntary use of cover letters and structured labeling to ensure the agency understands the purpose of submissions for easy product registration approvals.***
- E.** Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete? ***Yes, we use them. Forms are outdated and would benefit from a refresh. Forms with newer technology and more flexible formatting would allow for easier completion, and registrants would be less likely to create their own versions of forms.***

(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 and data submissions? Current electronic reporting alternatives include the use of web forms/XML based submissions via the Agency's Internet site and magnetic media-based submissions, e.g., diskette, CD-ROM, etc. Would you be interested in pursuing electronic reporting?

Fully support electronic submissions and electronic reporting. Arxada is actively using all electronic data submission to EPA.

- B.** Are you keeping your records electronically? If yes, in what format? ***The current practice is to maintain records electronically, but historically this has not been the case. For the electronic records, they are currently being maintained in PDF for final reports but raw data could be in paper or electronically (pdf, excel, access...etc)..***

Although the Agency does not offer an electronic reporting option because of CBI-related security concerns at this time,

- C. Would you be more inclined to submit CBI on diskette (CD or DVD) than on paper?

No, we prefer submitting the information online/electronically. We don't use CD or DVD any longer.

- D. What benefits would electronic submission bring you in terms of burden reduction or greater efficiency in compiling the information? *It would be faster and more efficient to submit everything electronic. Electronic submission allows data to be transmitted instantly, thus reducing delays. Manual submissions require physical delivery, which can take days. Electronic submission can reduce errors with built-in validation checks (e.g. required fields, format checks) to prevent incomplete or incorrect data. Electronic submission reduces cost with the elimination of printing, postage, and storage costs, improves tracking and transparency as it provides a submission record and audit trail. Electronic submission allows the agency to integrate data into their databases or analytical tools easier, reducing cost and time. Electronic submission also aligns with the changes in the workplace as it allows for submission to be done from anywhere there is internet access and 24/7.*

(5) Burden and Costs

- A. Is the identified NAICS code representative of your industry?

Yes it is representative of our industry.

3250A1 | Pesticides and Other Agricultural Chemical Manufacturing

- B. The Agency assumes there is no capital cost associated with this information collection activity. Is that correct? If not, please describe the investment associated with this activity.

Yes, we would agree there is no capital cost associated with this information.

- 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? 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? **No**