

Attachment B: Consultation Summary**Stakeholder Engagement**

Greetings,

I am with the Office of Pesticide Programs/Worker Protection and Intergovernmental Affairs Branch at the U.S. Environmental Protection Agency (EPA). I am writing to you today to request your assistance on an Information Collection Request (ICR). For the past few months, EPA has been updating the ICR for the [Foreign Purchaser Acknowledgement Statement of Unregistered Pesticides](#). As part of our consultation process, we are requesting comments from industry on this ICR renewal proposal.

Our records indicate that in the past you may have participated as a representative of your company in responding to the EPA's questions on this ICR. The questionnaire should only take about 15 minutes and your response is voluntary. Should you choose to respond, we ask that you do not submit any sensitive, confidential business information or business phone numbers as part of your response. For your convenience, an ICR supporting statement, and an ICR questionnaire is attached.

You may complete the ICR questionnaire and submit the completed questionnaire to the **EPA-HQ-OPP-2021-0749** at [Regulations.gov](#) or to me directly, by **January 23rd**.

We greatly appreciate your time and participation.

Stakeholders Contacted:

1. FMC Corporation
2. Koch Agronomic Services LLC
3. Kocide LLC
4. Neogen Corporation
5. Syngenta

Stakeholder Response: No comments.

Consultation Questions

Foreign Purchaser Acknowledgment Statement of Unregistered Pesticides; Renewal

(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?
- 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?

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

- E. Are there forms associated with this process? Do you use them? Are they clear, logical, and easy to complete?

(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.

\$ What do you think about electronic alternatives to paper-based records and data submissions?

\$ Are you keeping your records electronically? If yes, in what format?

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

(5) Burden and Costs

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