

Supporting Statement for an Information Collection Request (ICR) Under the Paperwork Reduction Act (PRA)

EXECUTIVE SUMMARY

Identification of the Information Collection – Title and Numbers

Title: EPA's Safer Choice Program Product and Partner Recognition Activities (Renewal)

EPA ICR No.: 2692.02

OMB Control No.: 2070-0221

Docket ID No.: EPA-HQ-OPPT-2021-0245

Abstract

This ICR renewal covers the information collection activities associated with the reporting and recordkeeping requirements for individuals, businesses, organizations, and government entities participating in or collaborating with EPA's Safer Choice and Design for the Environment (DfE) programs (referred to collectively as "the Safer Choice program" in this document unless otherwise indicated). This ICR also includes additional sections for the Safer Choice cleaning service certification and third-party profiler (TPP) solicitations. These components are designed to:

- Improve data efficiency by electronic data collection via a cloud-based Salesforce system called the Safer Choice Community;
- Monitor the public's awareness of the Safer Choice program and the Safer Choice label and DfE logo;
- Clarify the Safer Choice Partner of the Year Awards application process and form;
- Describe information collected through the new Safer Choice cleaning service certification program; and,
- Clarify the TPP application process and form.

Summary Total Burden and Costs

| IC Summary Table: Annual Burden and Cost over the Three-Year ICR Period | | | | |
|---|--------------|--------------|------------------|------------------|
| IC Category | Responses* | Burden | O&M Costs | Total Cost |
| Respondents | | | | |
| IC #1: Safer Choice program | 157 | 1,596 | \$545,600 | \$666,976 |
| IC #2: Safer Choice label consultation and consumer awareness | 4,330 | 2,111 | \$0 | \$116,105 |
| IC #3: Safer Choice Partner of the Year Awards | 35 | 525 | \$0 | \$40,565 |
| IC #4: Safer Choice cleaning service certification | 11 | 123 | \$8,250 | \$17,915 |
| IC #5: Third-party profiler solicitations | 6 | 156 | \$0 | \$12,797 |
| Annual Total | 4,539 | 4,511 | \$553,850 | \$854,358 |
| Agency | | | | |
| IC #1: Safer Choice program | N/A | 658 | | \$52,906 |
| IC #2: Safer Choice label consultation and consumer awareness | N/A | 15 | | \$33,378 |
| IC #3: Safer Choice Partner of the Year Awards | N/A | 64 | | \$5,320 |
| IC #4: Safer Choice cleaning service certification | N/A | 42 | | \$3,542 |
| IC #5: Third-party profiler solicitations | N/A | 95 | | \$8,015 |
| Annual Total | N/A | 874 | | \$103,161 |

*Total estimated average number of responses for each respondent: 1.

SUPPORTING STATEMENT

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The related legal authority derives from Section 6604(b)(5) of the Pollution Prevention Act (PPA), (42 U.S.C. 13103(b)(5) (**Attachment A**), which directs EPA to facilitate the adoption of source-reduction techniques by businesses, and the Toxic Substances Control Act (TSCA), (15 U.S.C. 2601 et seq.), which encourages safety through technological innovation in chemistry. EPA has developed the Safer Choice program in recognition of this statutory directive, and through consultation with a broad range of stakeholders.

1(a). Necessity of the Information Collection

The information collection activities covered by this ICR are necessary components of the Safer Choice program established under PPA and TSCA mandates.

Safer Choice information collection activities will assist the Agency in meeting the goals of the PPA by: (1) providing resources and recognition for individuals, businesses, organizations, and government entities committed to the design, manufacture, selection, promotion, sale, and use

of products with safer chemical ingredients and to innovation in safer chemistry; (2) ensuring that the Safer Choice label, the DfE logo, and the program's educational activities effectively communicate the Agency's missions under the PPA and TSCA; (3) recognizing the leadership contributions of Safer Choice partners and stakeholders who, over the past year, have shown achievement in the design, manufacture, selection, promotion, sale, and use of products with safer chemical ingredients, that further outstanding or innovative source reduction; (4) providing resources and recognition for cleaning service providers committed to the use of products with safer chemical ingredients; and (5) ensuring qualified TPPs have the expertise and objectivity needed to ensure a quality review of products and/or cleaning service providers, with high confidence in its accuracy and reliability. In turn, the Safer Choice program will help businesses meet corporate sustainability goals by providing the means to, and an objective measure of, environmental stewardship.¹ Investment analysts and advisers seek these types of measures in evaluating a corporation's sustainability profile and investment worthiness. It is not surprising, then, that EPA has heard from many organizations that Safer Choice program partnership is an important impetus for prioritizing and completing the transition to safer chemical products. The Safer Choice program is also needed to increase demand for and encourage the development of safer chemical-based products, to the benefit of consumers, including low income and minority communities, manufacturing partners, retailers, other stakeholders, and the environment.

Safer Choice has carefully tailored its request for information to ensure that it only asks for information essential for verifying applicant, product, and cleaning service eligibility for certification (e.g., via the Safer Choice Community cloud-based Salesforce system), testing the qualities of the selected label concepts and outreach efforts, verifying an applicant's eligibility for award or recognition (e.g., via the Safer Choice Program Partner of the Year application form), and verifying a candidate's eligibility for serving as a TPP (e.g., via the third-party profiler application forms).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The information collected by the Safer Choice program is not designed or intended to support regulatory decision-making by EPA. EPA will use the information collected to: (1) promote the program's scientific basis and the human health and environmental benefits of using products with safer chemical ingredients, (2) increase consumer recognition of certified products carrying the Safer Choice label or DfE logo, (3) recognize businesses and others already involved in the Safer Choice program and encourage additional businesses to participate in the Safer Choice program, and (4) further drive innovation and the development of products with safer chemical ingredients that protect human health and the environment.

¹ "Green to Gold: How Smart Companies Use Environmental Strategy to Innovate, Create Value, and Build Competitive Advantage;" Daniel Esty and Andrew Winston; Yale University Press, New Haven, CT; 2006.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

In order to facilitate collection activities, the Safer Choice program has implemented the Safer Choice Community, a cloud-based Salesforce system that houses application, review, and notification processes. This system is a centralized location for information collected as part of the Safer Choice program's various activities. In addition, the Agency will accept more traditional methods of delivery (mail, commercial delivery service, or hand delivery) as well as faxed and e-mailed application forms.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Respondents will not be asked to provide information that has been or is currently being collected by EPA, other federal or state agencies, or proprietary sources. The information collected by the Safer Choice program is unique and is not duplicative of previous information collection requests. EPA also checked with potential respondents to confirm that the information being collected does not exist elsewhere.

- 5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.**

EPA expects that some of the participants will be small entities. EPA has designed its application forms to minimize respondent burden while obtaining sufficient and accurate information. In addition, given the voluntary nature of the collection, EPA expects that respondents will participate only if the benefits of participation outweigh the information collection burden.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The application forms included in this ICR are designed to be one-time information submissions for organizations that wish to participate in or be recognized by the Safer Choice program. In relation to using the Safer Choice label or DfE logo, this means that once every three years, the organization will submit a renewal application to confirm that no changes have been made to ingredients; this step is done in response to correspondence from the Safer Choice program that reminds organizations of the terms of their partnership agreements. The consumer online survey to test awareness of the Safer Choice label and DfE logo will be conducted annually to measure trends in consumer recognition of the label/logo. The Partner of the Year Awards

application form is designed to be an annual information submission for only those organizations interested in being considered for the award. The application form for the Safer Choice cleaning service certification program is designed to be a one-time information submission for businesses that wish to participate in the program. In relation to using the Safer Choice Service cleaning service certification logo, this means that every year, the business will undergo an audit to ensure that it abides by the criteria of the cleaning service certification program; this step is done in response to correspondence from the Safer Choice program that reminds businesses of the terms of their partnership agreements. The third-party profiler application form is designed to be a one-time information submission for those organizations interested in serving as TPPs.

7. Explain any special circumstances that require the collection to be conducted in a manner:

- a) requiring respondents to report information to the agency more often than quarterly;**
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c) requiring respondents to submit more than an original and two copies of any document;**
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The proposed collection does not create special circumstances requiring justification under 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments

received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside EPA to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Pursuant to 5 CFR 1320.8(d)(1) in proposing to submit this ICR, EPA published a notice in the *Federal Register* on May 8, 2024, that provided a 60-day public comment period (89 FR 38895) (FRL-11924-01-OCSP). EPA received two comments in the docket in response to the 60-day public review opportunity. One comment was out of scope. The comments received have been posted in the docket, and the relevant comment is summarized below.

As required under 5 CFR 1320.8(d)(1), in addition to the public notice EPA staff contacted appropriate stakeholders and asked them for their assessment of the regulatory burden estimates expressed by the Agency in this ICR (**Attachment O**). The following stakeholders were contacted:

- International Sanitary Supply Association (ISSA)
- American Cleaning Institute (ACI)
- Jelmar
- Household & Commercial Products Association (HCPA)

Of those consulted, EPA received comments from all the stakeholders (**Attachment Q**). The Agency's responses to those comments are summarized below. The Agency thanks all commenters for their comments and has considered them in developing this ICR.

Summary of Comments Received from Stakeholders Contacted by EPA

ISSA stated that the data EPA seeks is generally not available from public sources or through other offices at EPA or by another agency. Regarding clarity of instructions, ISSA indicated that the ICR's intention is clear in requiring respondents to provide certain data for the Agency's utilization, and that requirements and process to submit data are clear. They added that Attachments B and C provide clear guidance on data submission. ISSA noted that the use of electronic records in the data submission system, the Safer Choice Community, is a beneficial practice and helps ISSA members who participate in the Safer Choice and DfE programs. ISSA concluded by stating its commitment to the success of the program.

EPA response: EPA appreciates receiving this information in support of this ICR. EPA thanks ISSA for their comments and continued support.

ACI commented that the data that the Safer Choice program seeks is not available from any public source, which makes the program unique and essential. ACI also noted that the Safer Choice program's instructions are clear in describing the data submission process to respondents during product or ingredient submission and that the reporting forms are clear and logical. ACI stated that EPA's estimates of the burden of proposed information collection are reasonable and accurate, and that the methodology and assumptions used are valid and appropriate. ACI pointed out that they are one of the few partners that submits cleaning product ingredients on behalf of their membership, and that there is considerable variability in chemical submissions and product submissions. This variability in submissions results in a wide range of timing and costs. ACI concluded by stating that the program is very beneficial to ACI and ACI members.

EPA response: EPA appreciates the comments and thanks ACI for their supportive statements. EPA understands that there is variability among submissions. Our estimates are meant to represent an average burden across chemicals and product submissions.

Jelmar stated that the data submitted under this ICR are not available to the public, though general ingredient information is available on resources such as CleanGredients, the HCPA Dictionary, and SCIL. They added that most of the data EPA seeks comes from the product manufacturer in the form of technical product information like product and ingredient formulations, performance, packaging, and labeling. Jelmar found the instructions for data collection clear and the Safer Choice data collection system easy to use and understand. Jelmar stated that they store their data electronically.

EPA response: EPA appreciates the confirmation from Jelmar that the information that is requested by Safer Choice, such as concentration of ingredients, is available only from the manufacturer. EPA thanks Jelmar for their feedback that clarity of instruction is sufficient, their response on electronic records, and their response on burden and cost.

Summary of Comments Received from Stakeholders in the Docket

HCPA was also contacted by EPA and chose to submit their feedback as a comment on the docket; this comment is described below.

The Household & Commercial Products Association (HCPA) expressed support for the Safer Choice program and its product and partner recognition activities, and they also indicated support for investing in the expansion of the Safer Choice program. HCPA appreciated the inclusion of the consumer survey in the ICR and believes it will provide insight into consumer perception of the labeling scheme. Regarding burden estimates, HCPA found that the estimated burden for the Partner of the Year application process was appropriate and corresponded with

their application submission experience. However, HCPA noted that the burden associated with the Safer Choice Summit was not included in the ICR.

EPA response: EPA thanks HCPA for their comments and continued support. EPA appreciates HCPA's assessment that the estimates for the program's burden regarding the Partner of the Year application submission process are in line with HCPA's understanding. Regarding the Safer Choice Summit, to clarify this event is held in conjunction with the Safer Choice Partner of the Year Award ceremony where we recognize the award winners for the year. EPA published a notice in the *Federal Register* that announced the Safer Choice Partner of the Year Awards ceremony on May 27, 2023 (88 FR 18135 (FRL-10577-01-OCSP)). For next year, we will include information on the Safer Choice Summit in the Agency's announcement for Partner of the Year award.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

For the purposes of this data collection, we anticipate the total incentive/travel reimbursement offered to each consumer focus group participant to be \$100. For further information, refer to **Attachment P**.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Some information collected by EPA through the Safer Choice program involves confidential business or trade secret information. The Safer Choice program handles all information claimed as such as confidential business information in accordance with Agency confidentiality procedures (see 40 CFR part 2, subpart B). The Safer Choice program uses information provided by businesses solely for the purposes related to forming partnerships and discloses the information only to EPA employees and EPA contractors cleared for confidential information with a specific need to know.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collection activities discussed in this document do not involve any sensitive questions involving sexuality, religious beliefs, political affiliation, or other matters considered private, as referred to in the Supporting Statement for PRA Submissions in the document

“Guidance on Agency Survey and Statistical Information Collections,” from January 20, 2006. EPA will adhere to its Privacy Policy (EPA classification number 2151) that establishes requirements for safeguarding the collection, access, use, dissemination, and storage of personally identifiable information (PII) and Privacy Act information in accordance with the Privacy Act of 1974, the E-Government Act of 2002, the Federal Information Security Management Act (FISMA), and policy and guidance issued by the President and OMB.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

For each respondent category, this section of the ICR describes the respondents, the information collection activities and related estimates for hour burden and costs associated with those activities. See Attachment N for detailed calculations of burden and cost.

12(a). Methodology for Estimating Respondent Burden and Costs

The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the paperwork requirements are described below:

- 115310 Support Activities for Forestry
- 323120 Support Activities for Printing
- 325180 Other Basic Inorganic Chemical Manufacturing
- 325199 All Other Basic Organic Chemical Manufacturing (Primary)
- 325320 Pesticide and Other Agricultural Chemical Manufacturing
- 325510 Paint and Coating Manufacturing
- 325520 Adhesive Manufacturing

- 3256 Soap, Cleaning Compound, and Toilet Preparation Manufacturing
- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325613 Surface Active Agent Manufacturing (Primary)
- 325620 Toilet Preparation Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 339930 Doll, Toy, and Game Manufacturing
- 339940 Office Supplies (except Paper) Manufacturing
- 423850 Service Establishment Equipment and Supplies Merchant Wholesalers (Primary)
- 424490 Other Grocery and Related Products Merchant Wholesalers
- 424690 Other Chemical and Allied Products Merchant Wholesalers (Primary)
- 424990 Other Miscellaneous Nondurable Goods Merchant Wholesalers
- 4451 Grocery Stores
- 445110 Supermarkets and Other Grocery (except Convenience) Stores (Primary)
- 445299 All Other Specialty Food Stores
- 446110 Pharmacies and Drug Stores
- 453210 Office Supplies and Stationery Stores
- 453998 All Other Miscellaneous Store Retailers (except Tobacco Stores) (Primary)
- 454110 Electronic Shopping and Mail-Order Houses
- 45521 Warehouse Clubs, Supercenters, and Other General Merchandise Retailers
- 481 Air Transportation
- 531110 Lessors of Residential Buildings and Dwellings
- 531120 Lessors of Nonresidential Buildings (except Miniwarehouses)
- 531311 Residential Property Managers
- 531312 Nonresidential Property Managers
- 541611 Administrative Management and General Management Consulting Services
- 541620 Environmental Consulting Services
- 541690 Other Scientific and Technical Consulting Services
- 541714 Research and Development in Biotechnology (except Nanobiotechnology) (Primary)
- 541990 All Other Professional, Scientific, and Technical Services

- 561210 Facilities Support Services
- 561720 Janitorial Services
- 561740 Carpet and Upholstery Cleaning Services
- 561790 Other Services to Buildings and Dwellings
- 611 Educational Services
- 611110 Elementary and Secondary Schools
- 611310 Colleges, Universities, and Professional Schools
- 6211 Offices of Physicians
- 6212 Offices of Dentists
- 6213 Offices of Other Health Practitioners
- 6214 Outpatient Care Centers
- 6215 Medical and Diagnostic Laboratories
- 622 Hospitals
- 622110 General Medical and Surgical Hospitals
- 623 Nursing and Residential Care Facilities
- 624410 Child Care Services
- 711310 Promoters of Performing Arts, Sports, and Similar Events with Facilities
- 7211 Traveler Accommodation
- 722511 Full-Service Restaurants
- 811192 Car Washes
- 8114 Personal and Household Goods Repair and Maintenance
- 8123 Dry cleaning and Laundry Services
- 813312 Environment, Conservation, and Wildlife Organizations
- 813319 Other Social Advocacy Organizations
- 813410 Civic and Social Organizations (Primary)
- 813910 Business Associations (Primary)
- 921190 Other General Government Support
- 924110 Administration of Air and Water Resource and Solid Waste Management Programs (Primary)

12(b). Estimated Respondent Burden and Costs by Information Collection

IC #1: Safer Choice product certification program applications (Safer Choice program)

Respondent NAICS Codes:

- 325180 Other Basic Inorganic Chemical Manufacturing
- 325199 All Other Basic Organic Chemical Manufacturing
- 325510 Paint and Coating Manufacturing
- 3256 Soap, Cleaning Compound, and Toilet Preparation Manufacturing

- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325620 Toilet Preparation Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 339930 Doll, Toy, and Game Manufacturing
- 339940 Office Supplies (except Paper) Manufacturing
- 424690 Other Chemical and Allied Products Merchant Wholesalers

Information Collection Activities:

Once a company with an interest in partnership with the Safer Choice program reviews the program materials and decides to apply, the next step for the organization is to submit the appropriate application.

Data items:

Applicants for this voluntary program submit information items that vary depending upon the class of product. The items include:

Partnership Applications

Product manufacturers will submit ingredient information, as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified TPP before submittal to EPA. See **Attachment B**.

Information submitted to third-party profilers:

- Company name and website URL;
- Number of employees;
- Company headquarters address and manufacturing address;
- Name, title, phone number, and e-mail address of the candidate’s signatory contact person (e.g., CEO, or vice president for health and environment);
- Name, title, phone number, and e-mail address of candidate’s technical contact person;
- Name, title, phone number, and e-mail address of candidate’s marketing/outreach contact person;
- Product information (name(s), UPC, GSA- National Stock Number/ Manufacturer Part Number, GTIN-14, ASIN, Retailer Identification Number, sector, production volume, concentration, pH, product form, product use, flashpoint, dilution ratio);
- Product characteristics on whether or not the product:
 - o Is an EPA registered pesticide;

- Is a direct release product;
 - Is a concentrate;
 - Contains enzymes, fragrance, or VOCs;
 - Requires hazard labeling;
 - Ingredient disclosure and performance data submitted;
- Packaging information:
 - Container size and shapes;
 - Material;
 - Supplier;
- Participation in optional energy-saving efforts. If yes, a description of efforts is submitted;
- Description of all chemical ingredients, including raw materials and alternative ingredients, in product:
 - CAS number;
 - Chemical name;
 - Trade name;
 - Percent composition;
 - Ingredient class;
 - Supplier name;
- Other product information, including product packaging description, product flashpoint, and compostability;
- Product label(s);
- Safety Data Sheet (SDS) for the product and each ingredient;
- Product performance testing (any method of demonstrating product performance is acceptable as long as it is a commonly used industry standard);
- If available, any supplemental product or ingredient environmental health and safety information, such as:
 - Biodegradation tests on individual ingredients;
 - Acute aquatic toxicity tests on product as a whole or individual ingredients;
 - Human health and safety tests; and
- Description of the type of training the company provides to customers on environmental and worker safety matters.

Information submitted to EPA:

- Summary report, containing same data items as above

Adding Private Label Partners, Products, and Alternate Product Names

Cleaning product manufacturers will submit information about private label additions to Safer Choice. To be label-eligible, private label products must contain ingredients identical to those in a Safer Choice-certified product. The three types of private label partners and products are private labels, licensees, and toll manufacturers. Cleaning product manufacturers will also submit information about alternate product names sold by the same manufacturer. To be label-eligible, alternate products must contain ingredients identical to those in a Safer Choice-certified product (**Attachment C**).

Information submitted to EPA through the Safer Choice Community cloud-based Salesforce system includes:

- Private label company name and website URL;
- Number of employees;
- Company headquarters address;
- Name, title, phone number, and e-mail address of candidate's marketing/outreach contact person;
- Current Safer Choice-certified product that is identical to the private label product;
- Product information (name(s), UPC, GSA - National Stock Number/ Manufacturer Part Number, GTIN-14, ASIN, Retailer Identification Number, sector, production volume, concentration, pH, product form, product use, flashpoint, dilution ratio); and
- Product label and packaging information.

Ingredient Submissions

Product and/or chemical manufacturers will submit ingredient information as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified third-party profiler before submittal to EPA. See Attachment B. Chemicals and ingredients submitted to EPA are candidates for listing on the Safer Choice Safer Chemical Ingredients List, candidates for GreenBlue's CleanGredients® database, or are provided in support of customers' product reviews.

Information submitted to TPPs:

- Ingredient name/trade designation and alternate name(s);
- Company name and website URL;
- Company headquarters address;
- Name, title, phone number, and e-mail address of candidate's technical contact person;
- Description of all chemicals, including raw materials and alternatives, in the ingredient:
 - CAS number;
 - Chemical name;
 - Trade name;

- Percent composition;
 - Ingredient class;
 - Supplier name;
- Structural and chemical identity information including particle size;
- Ingredient characteristics on whether or not the ingredient:
 - Contains preservatives, stabilizers, or antioxidants;
 - Contains residuals, impurities, or by-products;
 - Has proprietary biodegradation or toxicity test reports;
 - Is dry or in solution;
- An SDS for the overall ingredient and each sub-ingredient;
- If available, any supplemental product or ingredient environmental health and safety information, such as:
 - Biodegradation tests on individual ingredients;
 - Acute aquatic toxicity tests on product as a whole or individual ingredients;
 - and
 - Human health and safety tests.

Information submitted to EPA:

- Summary report, containing same data items as above.

Respondent activities:

Applicants for Cleaning and Non-Cleaning Product Formulation Partnerships

- Review program information, including instructions on submitting information to third-party profilers
- Submit information described in section 12(b) of this supporting statement to third-party profiler
- Establish agreement with third-party profiler
- Submit summary report to Safer Choice
- Establish Partnership Agreement with Safer Choice
- Renew partnership, with no changes needed
- Site and desk audit (**Attachment D**)

Adding Private Label Partners and Products and Alternate Product Names

- Review program information
- Submit information described in section 12(b) of this supporting statement to Safer Choice

| IC #1. Safer Choice product certification program applications | | | | |
|---|-------------|------------------|---------------|------------------------------------|
| Data Element | Form | Responses | Burden | Cost (Hour Burden Only) |
| Establishing partnership agreements | N/A | 44 | 704 | \$56,056 |
| Renewals and audits | N/A | 36 | 276 | \$18,696 |
| Adding private label, licensee, and toll manufacturer partners and products | N/A | 77 | 616 | \$46,624 |
| Annual Total | | 157 | 1,596 | \$121,376 |

IC #2: Safer Choice label consultations and consumer awareness

Respondents:

Respondents will be adult members of the general population who are consumers, including consumers who consider the environment when making purchasing decisions, herein called leaning green consumers.

Information Collection Activities:

Respondents screened for focus group participation will listen to questions and provide answers to those questions. Those selected to participate in the focus groups will listen to directions, be presented with materials for discussion, participate in group discussions, and complete forms. Consumer online survey participants will read directions, answer questions, and submit the online survey.

| IC #2. Safer Choice label consultations and consumer awareness | | | |
|---|------------------|---------------|------------------------------------|
| Data Element | Responses | Burden | Cost (Hour Burden Only) |
| Screening questionnaire for consumer focus groups | 300 | 51 | \$2,805 |
| Consumer focus groups | 30 | 60 | \$3,300 |
| Awareness test of visual mark – general adult population survey | 4,000 | 2,000 | \$110,000 |
| Annual Total | | 4,330 | \$116,105 |

IC #3: Safer Choice Partner of the Year Awards program

Respondent NAICS Codes:

- 115310 Support Activities for Forestry
- 323120 Support Activities for Printing
- 325180 Other Basic Inorganic Chemical Manufacturing

- 325199 All Other Basic Organic Chemical Manufacturing (Primary)
- 325320 Pesticide and Other Agricultural Chemical Manufacturing
- 325510 Paint and Coating Manufacturing
- 325520 Adhesive Manufacturing
- 3256 Soap, Cleaning Compound, and Toilet Preparation Manufacturing
- 325611 Soap and Other Detergent Manufacturing
- 325612 Polish and Other Sanitation Good Manufacturing
- 325613 Surface Active Agent Manufacturing (Primary)
- 325620 Toilet Preparation Manufacturing
- 325910 Printing Ink Manufacturing
- 325992 Photographic Film, Paper, Plate, and Chemical Manufacturing
- 325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing
- 339930 Doll, Toy, and Game Manufacturing
- 339940 Office Supplies (except Paper) Manufacturing
- 423850 Service Establishment Equipment and Supplies Merchant Wholesalers (Primary)
- 424490 Other Grocery and Related Products Merchant Wholesalers
- 424690 Other Chemical and Allied Products Merchant Wholesalers (Primary)
- 424990 Other Miscellaneous Nondurable Goods Merchant Wholesalers
- 4451 Grocery Stores
- 445110 Supermarkets and Other Grocery (except Convenience) Stores (Primary)
- 445299 All Other Specialty Food Stores
- 446110 Pharmacies and Drug Stores
- 453210 Office Supplies and Stationery Stores
- 453998 All Other Miscellaneous Store Retailers (except Tobacco Stores) (Primary)
- 454110 Electronic Shopping and Mail-Order Houses
- 45521 Warehouse Clubs, Supercenters, and Other General Merchandise Retailers
- 481 Air Transportation
- 531110 Lessors of Residential Buildings and Dwellings
- 531120 Lessors of Nonresidential Buildings (except Miniwarehouses)
- 531311 Residential Property Managers
- 531312 Nonresidential Property Managers
- 541620 - Environmental Consulting Services
- 541714 Research and Development in Biotechnology (except Nanobiotechnology) (Primary)

- 561210 Facilities Support Services
- 561720 Janitorial Services
- 561740 Carpet and Upholstery Cleaning Services
- 561790 Other Services to Buildings and Dwellings
- 611 Educational Services
- 611110 Elementary and Secondary Schools
- 611310 Colleges, Universities, and Professional Schools
- 6211 Offices of Physicians
- 6212 Offices of Dentists
- 6213 Offices of Other Health Practitioners
- 6214 Outpatient Care Centers
- 6215 Medical and Diagnostic Laboratories
- 622 Hospitals
- 622110 General Medical and Surgical Hospitals
- 623 Nursing and Residential Care Facilities
- 624410 Child Care Services
- 711310 Promoters of Performing Arts, Sports, and Similar Events with Facilities
- 7211 Traveler Accommodation
- 722511 Full-Service Restaurants
- 811192 Car Washes
- 8114 Personal and Household Goods Repair and Maintenance
- 8123 Dry cleaning and Laundry Services
- 813312 Environment, Conservation, and Wildlife Organizations
- 813319 Other Social Advocacy Organizations
- 813410 Civic and Social Organizations (Primary)
- 813910 Business Associations (Primary)
- 921190 Other General Government Support
- 924110 Administration of Air and Water Resource and Solid Waste Management Programs (Primary)

Information Collection Activities:

Once a prospective organization reviews the Partner of the Year Awards materials and decides to apply, it should submit a Partner of the Year Awards Application Form (EPA Form 9600-023) (**Attachment I**). All forms will be available in electronic format. Participants can download a Word Document version of the form from the Safer Choice website at www.epa.gov/saferchoice/safer-choice-partner-year-awards.

Data items:

The reporting items include:

- Organization name and website URL;

- Name, title, address, phone number, fax number, and e-mail address of the candidate’s primary contact person;
- Recognition category (or categories) for which the candidate is applying;
- Indication of whether the organization is a small business;
- Indication of whether the organization should be considered for sustained excellence;
- Descriptions of activities taken to qualify for recognition; and
- Signature, name, and title of senior company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory).

Respondent activities:

Candidates will conduct the following activities in order to complete and submit the Partner of the Year Awards Application Form:

- Review the Partner of the Year Awards information;
- Decide whether to apply for recognition, and in what recognition category or categories;
- Select a primary contact person for the program;
- Complete the Partner of the Year Awards Application Form, including obtaining the signature of a company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory);
- Describe how their organization meets the evaluation criteria for the relevant recognition;
- E-mail or mail the form to EPA; and
- Provide relevant documentation to EPA upon request.

| IC #3. Safer Choice Partner of the Year Awards Program | | | | |
|---|-------------|------------------|---------------|------------------------------------|
| Data Element | Form | Responses | Burden | Cost (Hour Burden Only) |
| Partner of the Year Awards Application Form for formulators/product manufacturers | 9600-023 | 19 | 285 | \$22,021 |
| Partner of the Year Awards Application Form for innovators | 9600-023 | 5 | 75 | \$5,795 |
| Partner of the Year Awards Application Form for retailers | 9600-023 | 3 | 45 | \$3,477 |
| Partner of the Year Awards Application Form for supporters | 9600-023 | 6 | 90 | \$6,954 |
| Partner of the Year Awards Application Form for purchasers and distributors | 9600-023 | 2 | 30 | \$2,318 |
| Annual Total | | 35 | 525 | \$40,565 |

IC #4: Safer Choice cleaning service certification program applications and audits (Safer Choice cleaning service certification)

Respondent NAICS Codes:

- 531110 Lessors of Residential Buildings and Dwellings
- 531120 Lessors of Nonresidential Buildings (except Mini-warehouses)
- 531311 Residential Property Managers
- 531312 Nonresidential Property Managers
- 561210 Facilities Support Services
- 561720 Janitorial Services
- 561740 Carpet and Upholstery Cleaning Services
- 561790 Other Services to Buildings and Dwellings
- 611 Educational Services
- 6211 Offices of Physicians
- 6212 Offices of Dentists
- 6213 Offices of Other Health Practitioners
- 6214 Outpatient Care Centers
- 6215 Medical and Diagnostic Laboratories
- 622 Hospitals
- 623 Nursing and Residential Care Facilities
- 624410 Child Care Services
- 711310 Promoters of Performing Arts, Sports, and Similar Events with Facilities
- 7211 Traveler Accommodation
- 921190 Other General Government Support

Information Collection Activities:

During this ICR period, the Safer Choice program will initiate a cleaning service certification program. Once a company with an interest in participation in the Safer Choice cleaning service certification program reviews the program materials and decides to apply, the next step for the organization is to submit an application.

Data items:

Applicants for this voluntary program submit the following information items:

Partnership Applications

Cleaning service providers will submit information, as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified third party profiler (“CSC Profiler”) before submittal to EPA (**Attachment J**).

Information submitted to CSC Profilers:

- Company name and website URL;

- Provider type (residential cleaner, commercial cleaner, individual facility with in-house cleaning service);
- Number of employees (estimation across organization);
- Company headquarters address;
- Name, title, phone number, and e-mail address of the candidate's signatory contact person (e.g., CEO, or vice president for health and environment);
- Name, title, phone number, and e-mail address of candidate's primary contact person;
- Name, title, phone number, and e-mail address of candidate's marketing/outreach contact person;
- Product information and verification:
 - Invoice(s) verifying the cleaning and disinfecting product types purchased by the applicant;
 - Product information (brand, name of product, sector, date purchased, quantity purchased);
- If applicable, request(s) for exception(s) and supporting documentation; and
- Attestation that the applicant is abiding by the criteria of the cleaning service certification program.

Information submitted to EPA:

- Summary report, containing same data items as above

Partnership Audits

Cleaning service providers will submit information, as described here, through the Safer Choice Community cloud-based Salesforce system, to a qualified CSC Profilers before submittal to EPA (**Attachment K**).

Information submitted to CSC Profilers:

- Product information and verification:
 - Invoice(s) verifying the cleaning and disinfecting product types purchased by the applicant;
 - Product information (brand, name of product, sector, date purchased, quantity purchased);
- If applicable, request(s) for exception(s) and supporting documentation;
- Attestation that the applicant is abiding by the criteria of the cleaning service certification program;
- Attestation that organization or business supplies informational material and resources about Safer Choice- and DfE-certified products to their employees;
- Materials, or images of materials, that use the Safer Choice cleaning service certification logo or mention the certification;
- Customer type(s) e.g., office building, home, sport facilities; and

- Number of households or businesses serviced.

Information submitted to EPA:

- Summary report, containing same data items as above

Respondent activities:

Applicants for Cleaning Service Certification Partnerships

- Review program information, including instructions on submitting information to CSC Profilers;
- Submit information described in section 12(b) of this supporting statement to a CSC Profiler;
- Establish agreement with a CSC Profiler;
- Submit summary report to Safer Choice; and
- Establish Partnership Agreement with Safer Choice.

Partnership Audits

- Review program information;
- Submit information described in section 12(b) of this supporting statement to Safer Choice; and
- Audit and renewal.

| IC #4. Safer Choice cleaning service certification program applications and audits | | | | |
|---|-------------|------------------|---------------|------------------------------------|
| Data Element | Form | Responses | Burden | Cost (Hour Burden Only) |
| Establishing partnership agreements | N/A | 10 | 120 | \$9,460 |
| Renewals and audits | N/A | 1 | 3 | \$205 |
| Annual Total | | 11 | 123 | \$9,665 |

IC #5: Third-Party Profiler Solicitations

Respondent NAICS Codes:

- 541611 Administrative Management and General Management Consulting Services
- 541620 Environmental Consulting Services
- 541690 Other Scientific and Technical Consulting Services
- 541990 All Other Professional, Scientific, and Technical Services

Information Collection Activities:

During this ICR period, the Safer Choice program will solicit applications for TPPs to review applications from companies interested in partnership with the Safer Choice program.

Organizations interested in applying to serve as a TPP for product certification should submit a Third-Party Profiler Application Form for product certification (EPA Form 9600-060) (**Attachment L**). Organizations interested in applying to serve as a TPP for the cleaning service certification (CSC Profiler) should submit a Third-Party Profiler Application Form for cleaning service certification (EPA Form 9600-061) (**Attachment M**). All forms will be available in electronic format.

Data items:

The reporting items include:

- Organization name and website URL;
- Name, address, phone number, fax number, and e-mail address of the candidate's primary contact person; and
- Descriptions of Technical Competence and Credibility.

Respondent activities:

Candidates will conduct the following activities in order to complete and submit the Third-Party Profiler Application Form:

- Complete the Third-Party Profiler Application Form for product certification (**Attachments L**) and/or for cleaning service certification (**Attachment M**), including obtaining the signature of a company or organization authority (e.g., CEO, vice president for governmental affairs, division head, or other authorized signatory);
- E-mail or mail the form to EPA; and
- Provide relevant documentation to EPA upon request.

| IC #5. Third-Party Profiler Solicitations | | | | |
|---|-------------|------------------|---------------|------------------------------------|
| Data Element | Form | Responses | Burden | Cost (Hour Burden Only) |
| Third-Party Profiler Application Form for Safer Choice product certification | 9600-060 | 3 | 116 | \$9,612 |
| Third-Party Profiler Application Form for Safer Choice Cleaning Service Certification program | 9600-061 | 3 | 40 | \$3,185 |
| Annual Total | | 6 | 156 | \$12,797 |

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

As shown in **Attachment N**, the only operation and maintenance cost associated with this information collection is the respondents' cost of establishing an agreement with a third-party profiler.

For product certification (IC #1), the cost associated with this activity is estimated to be \$12,400 annually. This estimate assumes that the typical application submitted by a cleaning product manufacturer will contain four products, each with 2 ingredients (\$650 each), 1 proprietary ingredient (\$1,300), and a \$500 administrative fee. The total cost per product is \$3,100. The total will be \$12,400 per company per application. Since 44 responses are expected under the Partnership Agreements collection activity (as explained in **Attachment N**), the total annual operation and maintenance cost is \$545,600.

For cleaning service certification (IC #4), the cost associated with this activity is estimated to be \$750 annually. This estimate assumes that applications submitted by cleaning service providers will range in complexity, with the average cost likely to be \$750 based on historical experience with the Safer Choice product certification program as well as conversations with cleaning

service providers and trade associations. Since 11 responses are expected (10 responses under the Partnership Agreements collection activity and 1 under the Renewals and Audits collection activity, as explained in **Attachment N**), the total annual operation and maintenance cost is \$8,250.

Combined, the total annual operation and maintenance cost is \$553,850.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

14(a). Agency Activities

The Safer Choice program consists of a variety of programs and initiatives that work together to meet the mission of the program.

Under the Safer Choice program, EPA engages in the following activities related to the application and decision process regarding certification of products and qualification of ingredients:

- Answer questions posed by potential applicants, including product manufacturers regarding certification under the program and ingredient manufacturers regarding qualification for use in Safer Choice- or DfE-certified products;
- Receive the completed applications, review for accuracy, and place any necessary follow-up calls;
- Apply EPA's chemical tools and expertise to understand toxicological characteristics of chemical ingredients and to ensure that they are the safest within their functional use class;
- Approve candidates for certification and notify both successful and unsuccessful applicants of the decisions; and
- Make final decisions about which products may be certified and carry the Safer Choice label or DfE logo.

EPA has developed the Safer Choice Community cloud-based Salesforce system to house applications and other information related to the Safer Choice program to reduce the public and Agency burden related to the application and decision process.

Under the Safer Choice program, EPA engages in the following activities in relation to consumer awareness and evaluation of the success of the Safer Choice label and DfE logo:

- Conduct consumer focus groups to test awareness and perception of the Safer Choice program and label and the DfE logo;
- Conduct annual consumer online surveys to evaluate consumer awareness and perceptions of the Safer Choice label and DfE logo;
- Review and analyze consumer online survey results; and
- Use results to measure consumer awareness and perceptions of the Safer Choice label and DfE logo.

Under the Safer Choice program, EPA engages in the following activities in relation to the Partner of the Year Awards:

- Distribute the Awards Application Form to potential participants and maintain a downloadable Word document version on the Safer Choice website;
- Answer questions posed by potential applicants regarding Partner of the Year Awards recognition;
- Receive the completed forms, review for completeness, and place any necessary follow-up calls;
- Screen award applicants to determine their history of civil or criminal EPA enforcement actions; and
- Approve candidates for Partner of the Year Awards recognition based on evaluation criteria (see Attachment I, Section 2) and notify both successful and unsuccessful applicants of the decisions.

Under the Safer Choice program, EPA engages in the following activities related to the application and decision process regarding certification of cleaning services:

- Answer questions posed by potential applicants regarding certification under the program;
- Receive the completed applications, review for accuracy, and place any necessary follow-up calls;
- Approve candidates for recognition certification and notify both successful and unsuccessful applicants of the decisions; and
- Make final decisions about which candidates may be certified and display the Safer Choice cleaning service certification logo.

Under the Safer Choice program, EPA engages in the following activities related to soliciting TPPs:

- Distribute the application form to potential applicants;
- Answer questions posed by potential applicants regarding TPP roles and responsibilities;
- Receive the completed forms, review for completeness, and place any necessary follow-up calls;

- Approve candidates to serve as TPPs based on evaluation criteria (see Section 2 within Attachments L and M) and notify both successful and unsuccessful applicants of the decisions.

14(b). Estimated Agency Costs

EPA estimates that it costs the agency approximately \$309,484 (\$103,161 annually) to carry out the activities associated with the information collection activities covered by this ICR. Agency labor costs are calculated based on hourly basic rates for federal employees in the Washington-Baltimore area published by the Office of Personnel Management effective January 2024.¹ The average hourly labor rate for managerial staff is estimated as the rate for a GS-13 Step 5 employee, for technical staff as a GS-10 Step 10 employee, and for clerical staff as GS-5 Step 1. These GS-level assumptions are consistent with those used in past EPA Office of Pollution Prevention and Toxics (OPPT) ICRs. The hourly rates were multiplied by an assumed loading factor of 1.639 to reflect federal fringe benefits. This loading factor is from a study by the Congressional Budget Office,² which is recommended in EPA's *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other U.S. EPA Actions*³ as a useful source for estimating benefit values for federal government workers.

14(c). Collection Schedule

Collection schedules under each part of the ICR are as follows:

- For the Safer Choice product certification program, organizations may submit applications at any time during the three-year period. Once approved, the Safer Choice certification lasts for a three-year period.
- Consumer online surveys will be distributed at yearly intervals during the course of the three-year approval period.
- Focus groups will be conducted at yearly intervals during the course of the three-year approval period.
- For the Partner of the Year Awards program, organizations can submit an application for each of the three years.
- For the Safer Choice cleaning service certification program, organizations may submit applications at any time during the three-year period. Once approved, the Safer Choice certification lasts for a one-year period. Annual audits are needed to extend the certification.

1 OPM, 2024. Salary Table 2024-DCB. *Washington-Baltimore-Arlington, DC-MD-VA-WV-PA*. Available at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB_h.aspx

2 Falk, J. 2012. *Comparing Benefits and Total Compensation in the Federal Government and the Private Sector*. Congressional Budget Office Working Paper Series. Retrieved from <https://www.cbo.gov/sites/default/files/112th-congress-2011-2012/workingpaper/2012-04fedbenefitswp0.pdf>

3 U.S. Environmental Protection Agency (U.S. EPA) National Center for Environmental Economics. 2020. *Handbook on Valuing Changes in Time Use Induced by Regulatory Requirements and Other EPA Actions*. EPA-236-B-15-001. December 9, 2020.

- Organizations interested in serving as a TPP can submit an application at any time during the course of the three-year approval period.

15. Explain the reasons for any program changes or adjustments reported in hour or cost burden.

This information collection is a renewal of a previously approved ICR (EPA ICR No. 2962.01). The annual burden from the previously approved ICR was 3,232 hours. The annual burden requested for this ICR is 4,511 hours, or an increase of 1,279 hours from the previous total burden.

The difference between the current burden request and that of the previously approved ICR is due to three changes when calculating the burden of this ICR:

- The inclusion of the DfE program and logo in addition to the Safer Choice program and label when fielding the annual consumer online surveys, increasing the number of survey respondents from 2,000 to 4,000 annually (adds 1,000 hours annually);
- The inclusion of a new program, the Safer Choice cleaning service certification (adds 123 hours annually); and
- The inclusion of the TPP solicitation process (adds 156 hours annually).

The annual cost burden (i.e., excluding hour burden) from the previously approved ICR was \$545,600. The annual cost burden requested for this ICR is \$553,850, or an increase of \$8,250 from the previous total cost burden. The increase in cost burden is due to the inclusion of the new Safer Choice cleaning service certification program, as that program will involve the operation and maintenance cost associated with respondents establishing an agreement with a third-party profiler.

Detailed breakdowns of the calculations for burden and cost estimates are available in **Attachment N**.

16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

EPA does not request an exception to the certification of this information collection.

SUPPLEMENTAL INFORMATION

PRA Burden Statement

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-0221). Responses to this collection of information are voluntary. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be between .17 to 58 hours per response. Send comments on the Agency’s need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Information Engagement Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.”

You can also provide comments to the Office of Information and Regulatory Affairs, Office of Management and Budget via <https://www.reginfo.gov/public/do/PRAMain>. Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

All comments received by EPA will be included in the docket without change, including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI), or other information whose disclosure is restricted by statute. Do not submit electronically any information you consider to be CBI or other information whose disclosure is restricted by statute.

LIST OF ATTACHMENTS

The attachments listed below can be found in the docket for this ICR. The docket for this ICR is accessible electronically through <http://www.regulations.gov> using Docket ID Number: EPA-HQ-OPPT-2021-0245.

| Ref. | Title |
|------|--|
| A | 42 USC 13103 – Pollution Prevention Act Section 6604 |
| B | Safer Choice Program: Product and Ingredient Submissions in the Safer Choice Community cloud-based Salesforce system (EPA Form 9600-017) |
| C | Safer Choice Program: Private Label Submissions in the Safer Choice Community cloud-based Salesforce system |

| | |
|---|---|
| | (Private Label Companies, Licensees, or Toll Manufacturers) (EPA Form 9600-018) |
| D | Safer Choice Program: Audit Process Guidance |
| E | Screening Questionnaire for General Adult Consumer Focus Group (EPA Form Number 9600-019) |
| F | Screening Questionnaire for “Leaning Green” Consumer Focus Group (EPA Form Number 9600-020) |
| G | Moderator’s Guide for Consumer Focus Group Session (EPA Form Number 9600-021) |
| H | Survey to Test Awareness and Perceptions of EPA’s Safer Choice Label and Alternate Labels: General Adult Population Survey (EPA Form 9600-022) |
| I | Safer Choice Program Partner of the Year Awards Application Form (EPA Form 9600-023) |
| J | Safer Choice Cleaning Service Certification: Organization application in the Safer Choice Community cloud-based Salesforce system (EPA Form 9600-058) |
| K | Safer Choice Cleaning Service Certification: Organization audit in the Safer Choice Community cloud-based Salesforce system (EPA Form 9600-059) |
| L | Third-Party Profiler Application Form for Product Certification (EPA Form 9600-060) |
| M | Third-Party Profiler Application Form for Cleaning Service Certification (EPA Form 9600-061) |
| N | Detailed Calculations of Burden and Cost Estimates |
| O | Request for Stakeholder Feedback |
| P | EPA’s Safer Choice Label Consultations Part B |
| Q | Stakeholder Responses |