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Revision and Extension of Approval of an Information Collection; Plant Pest, Noxious Weed, and Garbage Regulations

Docket ID: APHIS-2009-0042 Agency: APHIS

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Comment from na na <i>Comments Due 10/06/09 11:59 PM ET</i>	PUBLIC SUBMISSIONS	na na		APHIS-2009-0042-0002	08/10/09	
Comment from Scott Mundell <i>Comments Due 10/06/09 11:59 PM ET</i>	PUBLIC SUBMISSIONS	Scott Mundell	Pioneer Hi-Bred International, Inc.	APHIS-2009-0042-0003	10/06/09	
Comment from Scott Mundell <i>Comments Due 10/06/09 11:59 PM ET</i>	PUBLIC SUBMISSIONS	Scott Mundell	Pioneer Hi-Bred International, Inc.	APHIS-2009-0042-0003.1	10/06/09	

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October 5, 2009

Submitted via Federal eRulemaking Portal

Docket No. APHIS-2009-0042

Pioneer Hi-Bred International, Inc
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Re: Comments to Docket No. APHIS-2009-0042

To whom it may concern:

These comments are submitted by Pioneer Hi-Bred International in response to the announcement the Animal and Plant Health Inspection Service's intention to revise and information collection associated with plant pest, noxious weed, and garbage regulations and to request and extension of approval of the information collection.

Pioneer Hi-Bred International, Inc., a DuPont business, is the world's leading developer and supplier of advanced plant genetics to farmers worldwide. Pioneer seeks to increase customer productivity, profitability and develop sustainable agricultural systems for people everywhere. Innovative and customer-focused, Pioneer is a leader in the agriculture industry and upholds the highest standards. Headquartered in Johnston, Iowa, Pioneer provides services to customers in nearly 70 countries. DuPont is a science company, delivering science-based solutions that make a difference in people's lives in food and nutrition, health care, apparel, home and construction, electronics and transportation.

Pioneer supports a method to collect data that minimizes the burden of information collection. Additionally, Pioneer supports electronic permitting as it is clearly more efficient than paper submissions. However Pioneer is concerned with certain permit submission requirements, specifically with the requisite that the only individual allowed to request a permit is the site responsible researcher. In reality, industry research is guided centrally at a corporate headquarters and local research staff is directed in the need for and management of specific field trials. Often, site responsible researchers are not plant pathologists or entomologists and consequently are ill equipped to apply for and respond to PPQ permit review staff. Pioneer, as the actual responsible party in the context of it's research, provides site staff with training and compliance assistance in

order to conduct field trials with pathogens or insects regulated by PPQ. For these and many other reasons, Pioneer proposes that the applicant for a PPQ permit be redefined to allow an expert group of permit specialists to submit permit applications. The only change Pioneer is advocating is the individual who is an acceptable applicant. Contact information for the local site specific individual would be provided, and Pioneer supports the idea that this information would be mandatory with each permit application submission. Additionally, the ePermits system is already equipped to handle this information, so no programming costs would be incurred. In addition to providing contact information, details regarding the compliance training process and/or training records could be provided to APHIS. Some additional advantages are fewer individuals for APHIS to contact and interact with, receiving more timely feedback, and allowing corporate applicants to ensure compliance with APHIS regulations.

Pioneer would also like to comment on the estimate of burden for the collection of information for each permit application. The estimate of 0.500398 hours per response listed by APHIS is not representative of the actual time it is taking Pioneer to submit applications, either on paper or via ePermits. A more accurate figure would be an average of 1 hour. Furthermore, many applications require additional information in the form of electronic inspections which require an additional average time of 4 hours of collecting and organizing data.

In summary, Pioneer strongly supports the ePermit system as it is an effective method to manage permit submissions by facilitating communication and information collection. However, changes to agency policy associated with applicants are needed. Furthermore, although the ePermits system is a more efficient method of information collection the estimate of an average of 1 hour may more accurately represent the time it takes to submit an application.