

**Comments from Yogin Kothari, Legislative Representative,
Center for Science and Democracy, Union of Concerned Scientists
April 10, 2018**

The Union of Concerned Scientists urges ACUS to make clear that the gathering of information from regulated entities and the public by federal agencies provides benefits: safe workplaces, enhanced public health, and environmental protections.

We recommend strengthening Recommendation 8, so that that message is very clear, and ensures that the public has a role in any efforts to assess the cumulative effects of information collections.

UCS suggested revisions to Recommendation 8:

OIRA should consider gathering feedback on classes of respondents, including businesses, as well as state, tribal, and local governments, as well as the public, about the cumulative effects of information collections. Such feedback should invite comments on not only the burdens of responding to requests for information from federal agencies, but also the benefits such information collections provide to public health and safety, consumer and workplace safety, and environmental protection. To facilitate this effort, OIRA may also consider requiring -agencies to use North American Industry Classification System (NAICS) codes. Agencies can then use this information to assess the distributional impacts of information collections on the public more broadly