

SUPPORTING STATEMENT - OMB NO. 0579-0256
HEALTH CERTIFICATE/EXPORT CERTIFICATE – ANIMAL PRODUCTS
June 15, 2007

A. Justification

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 export of agricultural commodities, including animals and animal products, is a major business in the United States and contributes to a favorable balance of trade. As part of its mission to facilitate the export of U.S. animals and products, the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) maintains information regarding the import health requirements of other countries for animals and animal products exported from the United States

Many countries that import animal products from the United States require a certification that the United States is free of certain diseases. These countries may also require that APHIS' certification statement contain additional declarations regarding the U.S animal products being exported. This certification must generally carry the USDA seal and be endorsed by a Federal or accredited veterinarian. VS Form 16-4, Health Certificate-Export Certificate-Animal Products, can be used to meet these requirements.

The regulations governing the export of animal products from the United States are found in Subchapter D, Part 91 of Title 9, Code of Federal Regulations: *Exportation and Importation of Animals (Including Poultry) and Animal Products*. These regulations are authorized by 21 U.S.C. 112.

APHIS is asking OMB to approve its use of the VS 16-4 in connection with APHIS' efforts to address the animal product import requirements of other countries.

2. Indicate how, by whom, how frequently, 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.

Health/Export Certificate for Animal Products (VS 16-4)

The VS 16-4 serves as the USDA's official certification that the United States is free of rinderpest, foot-and-mouth disease, classical swine fever, swine vesicular disease, African swine fever, bovine fever, bovine spongiform encephalopathy, and contagious bovine pleuropneumonia.

A U.S. exporter wishing to export animal products to another country must complete a section of the VS 16-4 entitled: *Description of Consignment*. This area of the form contains separate blocks for the exporter's name and address, the name and address of the consignee, the quantity, unit of measure, and type of product being exported; the exporter's identification, and the type of conveyance (ship, train, truck) that will transport the products. The 16-4 also contains a large blank space for additional declarations to be listed. The exporter completes this section as well, listing any declarations the receiving country might require, such as statements concerning where the product originated and how it was processed.

Once this section of the form is completed, the exporter submits the VS 16-4 to Veterinary Services, at which time the form is reviewed for completeness and accuracy before being signed by the authorized veterinarian (endorsing official). The VS 16-4 remains valid for 30 days after the date of signature.

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.

The VS 16-4 is available to the public on-line (<http://inside.aphis.usda.gov/property/apps/idea.html>). The exporter can print off a copy of the VS 16-4, complete the appropriate sections, and submit the form to Veterinary Services via fax or mail. Veterinary Services then re-enters this information on an original VS 16-4 that contains the official USDA seal.

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

The information that APHIS collects is not available from any other source. APHIS is the only Federal Agency responsible for certifying –for the purpose of animal product export-- that the United States is free of certain diseases.

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

The information collected is the minimum needed to officially certify, to the satisfaction of receiving countries, that the United States is free of certain animal diseases.

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.

If the information was collected less frequently or not collected, many countries would not accept animal products from the United States, creating a serious trade imbalance and adversely affecting U.S. exporters.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

This information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1320.5.

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

In 2007, APHIS engaged in productive consultations with the following individuals concerning the information collection activities associated with this program:

Jim Sumner
U.S.A. Poultry and Egg Export Council
2300 W. Park Place Blvd., Suite 100
Stone Mountain, GA 30087
(770) 413-0006

Nancy Cook
Pet Food Institute
2025 M Street, NW Suite 800
Washington, DC 20036
(202) 367-1120

Kent Swisher
National Renderers Association
810 North Fairfax Street, Suite 207
Alexandria, VA 22314
(703) 683-3561

On Monday, April 9, 2007, page 17476, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. No comments from the public were received.

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

This information collection activity involves no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

This information collection activity will ask no questions of a personal or sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

•Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

See APHIS Form 71. Burden estimates were developed from discussions with U.S. exporters of animal products.

•Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The annualized cost to the above respondents (\$1,650,000) was calculated by multiplying their estimated average hourly wage (\$25) by the number of hours (66,000) required to

complete the VS 16-4. \$25.00 hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics June 2003 Report - National Compensation Survey: Occupational Wages in the United States, July 2002. See <http://www.bls.gov/ncs/ocs/sp/ncbl0539.pdf>

13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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.

There is zero annual cost burden associated with capital and start-up costs, operation and maintenance expenditures, and purchase of services.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The annualized cost to the Federal Government is estimated at \$3,146,031.90. (See APHIS Form 79.)

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The number of respondents has increased slightly as a result of an increase in the business of exporting animal products.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

APHIS has no plans to publish information it collects in connection with this program.

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

If the form were to be discarded because of an outdated OMB expiration date, but otherwise usable, higher printing costs would be incurred by the Federal Government. Therefore, APHIS is seeking approval to not display the OMB expiration date on its form.

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

APHIS can certify compliance with all provisions of the Act.

B. Collections of Information Employing Statistical Methods

There are no statistical methods associated with the information collection activities used in this program.