

SUPPORTING STATEMENT - OMB NO. 0579-0048
Requirements for Poultry and Hatching Eggs for Export

August 24, 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.

Title 7, U.S.C. 8301, The Animal Health Protection Act authorizes the Secretary of Agriculture to take such measures he/she deem proper to prevent the introduction or dissemination of the contagion of any contagious or communicable disease of animals and/or live poultry from a foreign country into the United States or from one State to another.

The export of agricultural commodities, including poultry and hatching eggs, 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. poultry and poultry products, the Veterinary Services (VS) program of USDA's Animal and Plant Health Inspection Service (APHIS) maintains information regarding the import health requirements of other countries for poultry and hatching eggs exported from the United States.

Most countries require a certification that U.S. poultry and hatching eggs are disease free. This certification generally must carry the USDA seal and be endorsed by an authorized Veterinary Services veterinarian. VS Form 17-6, Certificate for Poultry & Hatching Eggs for Export, is generally used to meet these requirements.

With this certificate, exporters are able to attest to the health of the poultry and hatching eggs they are offering for export. This certification is therefore crucial to the U.S. exporter's ability to successfully export poultry and hatching eggs.

APHIS is asking OMB to renew its 3 year approval of VS Form 17-6, Certificate for Poultry & Hatching Eggs for Export, in connection with APHIS efforts to certify the disease-free status of poultry and hatching eggs exported from the United States.

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.

Certificate for Poultry or Hatching Eggs for Export – VS 17-6

A USDA accredited veterinarian issues the VS 17-6, using information obtained from owners/exporters of these products. The certificate is then endorsed by a Federal veterinarian. The collection of this information helps to prevent unhealthy poultry or disease-carrying

hatching eggs from being exported from the United States, thereby preventing the international dissemination of poultry diseases.

The collection of this information is also necessary to satisfy the import requirements of the receiving countries, thereby protecting and encouraging trade with the United States. If this certification was not provided, other countries would not accept poultry or hatching eggs from the United States.

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.

No electronic form is available for this purpose. The certificate has to be endorsed by a Federal veterinarian.

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 on the VS 17-6 is exclusive to its mission of ensuring the health status of poultry and hatching eggs exported from the United States, and is not available from any other source.

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

The information APHIS is collecting is the minimum needed to certify the health status of poultry and hatching eggs exported from the United States.

6. Describe the consequences 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.

Use of the VS 17-6 is a critical component of APHIS' export program. Without this form, APHIS would be unable to certify the health status of poultry and hatching eggs being exported from the United States to other countries. Consequently, owners and exporters of poultry and hatching eggs would be unable to export these products to other countries, and the United States would be unable to compete in the world market of animal trade.

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:

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On Friday, July 13, 2007, pages 38552 – 38553, APHIS published in the Federal Register, a 60-day notice seeking public comments on its plans to request a 3 year extension of this collection of information. No comments 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 APHIS headquarters and field personnel, and owners of poultry and hatching egg operations, and exporters of these products.

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

Respondents are owners of poultry and hatching egg operations, and exporters of these products. APHIS estimates the total annualized cost to these respondents to be \$144,000. APHIS arrived at this figure by multiplying the hours of estimated response time (4,800 hours) by the estimated average hourly wage of the above respondents (\$30.00).

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/ncb10539.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 \$228,802.32. (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.

Exporters have increased the size of their shipments in order to decrease the frequency of export shipments. Consequently, the use of VS 17-6 forms has decreased. The decrease in use of VS 17-6 resulted in the decrease in burden and its associated costs.

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

APHIS has 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 forms 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 Item 19 "Certification for Paperwork Reduction Act."

APHIS can certify compliance with all provisions under the Act.

B. Collections of Information Employing Statistical Methods

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