

SUPPORTING STATEMENT - OMB NO. 0579-0020
U.S. ORIGIN HEALTH CERTIFICATE

March 26, 2007

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

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.

Most countries require a certification that our animals are disease free. This certification generally must carry the USDA seal and be endorsed by an authorized APHIS veterinarian. VS Form 17-140, U.S. Origin Health Certificate, is generally used to meet these requirements. This form is authorized by 21 U.S.C. 112. The regulation that implements this law is found in Part 91 of Title 9, Code of Federal Regulations.

APHIS is seeking OMB approval to continue the use of VS Form 17-140 and VS Form 17-140A, U.S. Origin Health Certificate, for an additional 3 years.

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.

U.S. Origin Health Certificate, VS 17-140 and VS 17-140a

The U.S. Origin Health Certificate is used in connection with the exportation of animals to foreign countries, and is completed by an authorized APHIS veterinarian using information obtained from owners/exporters of the animals. The information collected is used to establish that the animals are moved in compliance with USDA regulations, to verify that the animals destined for export are listed on the health certificate by means of an official identification, and to verify to the consignor and consignee that the animals being offered for export are healthy. The U.S. Origin Health Certificate also contains the results of various tests conducted on the animals (such as tests for tuberculosis or brucellosis) and the dates the tests were conducted.

The collection of this information helps to prevent unhealthy animals from being exported from the United States, thereby preventing the international dissemination of animal diseases. The collection of this information is also necessary to satisfy the import

requirements of the receiving countries, thereby facilitating trade between the United States and other regions of the world.

In addition to requiring certifications that attest to the health of individual animals, receiving countries may also require that the pre-export facilities in the United States be inspected, that procedures at the facility be approved, and that the animals be transported in cleaned and disinfected vehicles. Certifications that these conditions have been met are contained in the U.S. Origin Health Certificate.

If these certifications were not provided, other countries would not accept animals from the United States.

Marking (Tattoos, Ear Tags, or Brands)

All goats and sheep intended for export from the United States must be identified by USDA-approved ear tags or tattoos. Goats and sheep destined for export to Canada or Mexico for immediate slaughter may be identified by flock brands. These ID's must be recorded on the U.S. Origin Health Certificate that accompanies the animals to the receiving country.

Undue Hardship – Animals

In special cases, certain ports (other than those officially designated in Section 91.14 as official ports of embarkation) may be designated as ports of embarkation by APHIS when the exporter can demonstrate, in writing, that the animals to be exported would suffer undue hardship if they must be moved to an official port of embarkation. The explanation of undue hardship can be submitted to APHIS via letter, fax, or e-mail.

Application for Approval of Inspection Facility – Environmental Certification

Applications for approval of an export inspection facility must contain basic information such as the facility's location, size, cleaning and disinfection procedures, testing and treatment capabilities, and other critical information. This application must also be accompanied by a certification from local environmental authorities stating that the facility complies with all applicable State or local regulations or ordinances, and the requirements (if any) of the U.S. Environmental Protection Agency, in connection with the disposal of animal wastes. These certification statements can be submitted to APHIS via fax (or as an e-mail attachment if the State or local environmental authorities maintain the certification documentation in their computer files).

Opportunity to Present Views Concerning Withdrawal of Facility Approval

The Animal and Plant Health Inspection Service can deny or revoke its approval of an export inspection facility, but must first send the facility's operator a written notice at least 60 days prior to the date of the proposed revocation or denial. The facility operator then has an opportunity to provide APHIS with a written explanation as to why approval

should not be denied or revoked. This letter of explanation can be submitted to APHIS via letter, fax, or e-mail.

Notarized Statement

The owner or master of an ocean vessel used to export livestock from the United States must ensure that the vessel's air supply system is such that each animal compartment is subject to an appropriate air exchange rate. A notarized statement to this effect must be obtained from the engineering concern that designed the vessel's air supply system, and this statement must be presented to an APHIS inspector when the vessel is used for the first time, or after the vessel has undergone substantiative changes that might affect the air exchange rate in animal compartments.

Recordkeeping for Modification

Rail (wooden) stanchions used for pens aboard an ocean vessel for cattle or horses must be placed a certain distance apart and properly secured to the ship's bulwark to ensure the safety and comfort of the animals during export. The method of securing and bracing these stanchions may be modified as approved by the underwriter of the cargo bureau and the APHIS inspector. Written information concerning these modifications must be provided to APHIS, upon request, via hard copy, fax, or e-mail. Records should be kept for 3 years.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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 application for a U.S. Origin Health Certificate can be accessed on-line, printed, filled out, and submitted to APHIS via fax. The undue hardship letter, environmental certification statements that must accompany applications for facility approval, letters to contest a denial or revocation of facility approval, and records of vessel modifications can be e-mailed or faxed to APHIS.

The two information collections that do not lend themselves to electronic submission are marking requirements such as tattoos, ear tags, or brands; and the notarized statement that must be submitted to APHIS concerning the adequacy of a vessel's air exchange rate.

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 in connection with the exportation of animals from the United States –including information contained on the U.S. Origin Health Certificate is exclusive to APHIS’ mission of ensuring the health status of U.S. animals that are sent to other countries. It 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 ensure that U.S. exporters meet the minimum import requirements of other countries.

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.

The U.S. Origin Health Certificate, the proper identification of animals for export, and the approval of export inspection facilities in the United States are critical components of our export program. Without these information collection activities, we would be unable to certify the health status of animals being exported from the United States to other countries. Without this certification, 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 1320.6.

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 its use of the U.S. Origin Health Certificate and other information collections employed in the export of animals from the United States:

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

Paul Rodgers
American Sheep Industry Association
Route 2, Box 94
Ronceverte, West Virginia 24970
304-647-9981

Dr. Paul Sundberg
National Pork Producers Council
P.O. Box 10383
Des Moines, Iowa 50306
515-223-2764

On Monday, March 19, 2007, pages 12755-12756, 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 and attitudes, religious beliefs, and others that are 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.

APHIS asks 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 for hour burden estimates. APHIS arrived at these estimates through discussions with Veterinary Services and State field personnel, accredited veterinarians, animal health technicians, and other regulated entities including owners and exporters of cattle, swine, horses, sheep, goats, and poultry.

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

Total cost to respondents (\$657,225.00) is computed by multiplying their average hourly wage (\$25.00) by the total number of hours (26,289) needed to complete the work.

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, maintenance costs, and purchase of services in connection with this program.

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 estimated cost for the Federal Government is \$1,073,074.11 (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.

There is an adjustment increase of +3735 hours for the renewal of this information collection. Previously, the burden hours were 22,554. The difference of +3735 is the result of recordkeeping now being accounted for in this information collection.

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

APHIS has no plans to tabulate or publish the information APHIS is collecting.

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 forms.

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

APHIS is able to certify compliance with all the provisions of the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.