

SUPPORTING STATEMENT

A. Justification

1. Circumstances that make collection of information necessary.

Collection of this information contributes to the biological control and taxonomic research programs of USDA's Agricultural Research Service (ARS). Agricultural research is authorized by legislation including 7 U.S.C., Sec. 427, Public Law 97-98, and amendments as listed on the attachment. Recording the introduction and release of non-indigenous biological control organisms (invertebrate and microbial), and pollinators, in the United States by scientists and other practitioners of biological control of pests in the USDA (ARS, Forest Service, and APHIS), other federal agencies, state and local governments, universities, and other domestic and foreign organizations, addresses the data collection provisions noted in the Executive Order on Invasive Species issued February 3, 1999. Provision of the data has been voluntary, but will be made mandatory for ARS biological control practitioners.

2. Purpose for which information is to be used.

The paper forms utilized for collection of these data have been in operation since 1984. Data collected have been entered into the USDA "Releases of Beneficial Organisms in the United States and Territories" (ROBO) database, maintained by the ARS Biological Control Documentation Center at Beltsville, MD. Data for three years (1981-83) have been published, and copies of the publications made available to all providers of the data. No further paper publications are planned. The data are also now being placed on the World Wide Web on the Internet; data on importation of invertebrates by USDA scientists (1981-2007) are now on the Web: <http://www.ars-grin.gov/nigrp/robo.html>.

3. Extent to which this information collection uses automated, electronic or other forms of information technology.

Collection of these data have until recently been mainly by use of the paper forms, and data have been entered into the ROBO database from them. A computerized method is being developed for providing the data now recorded on the forms for direct entry by all users into the ROBO database on a Sun computer located in USDA's Germplasm Resources Information Network at Beltsville, MD, with computerized production of completed forms for inclusion in shipments of biological control organisms. One of the three data collection forms (the AD-941 for recording importation of invertebrates) has been tested and is now operational. Proposed dates for completion of the other two forms is not known at this time.

4. Efforts to identify duplication.

The nation-wide collection of these types of data is unique. Several federal and state locations and universities involved in biological control have developed their own simple computerized systems for recording data on their introductions and releases, mainly based on the USDA-ARS

system. Efforts will be made to utilize those computerized files for direct entry into the ROBO database. There is no duplication in regard to the national database.

5. Impact on small businesses.

There is no impact on small business.

6. Consequences to the federal program if information collection is not conducted.

There have been published concerns by the Congressional Office of Technology Assessment and other organizations and persons as to the possible detrimental effects of the introduction of non-indigenous organisms, including biological control organisms and pollinators, into the United States. The ROBO program is the only national system to record introductions and releases of biological control organisms and pollinators into the U.S., and its elimination would leave no systematic method for the collection of such information.

7. Special requirements of this information collection.

This information collection is entirely voluntary (except for ARS scientists), and collection is made at the convenience of the organizations providing the data. This would change only if such information collection were to be mandated by law by the U.S. Government; there is no movement in that direction at this time. Some federal, university and state biological control quarantine facilities are required to maintain records of their importations as a requisite for obtaining permits for introduction of exotic organisms into their facilities, which is an aid to, but not a requirement by, the ROBO program.

8. Federal Register Notice.

A Federal Register Notice concerning this collection activity was published on June 30, 2008, Volume 73, No. 126, Page 36837. One comment was received from the public but was not related to the burden package. There was not any consultation with an outside agency representative on the information collection prior to submission to OMB.

9. Gifts or payments.

No gifts or payments have been provided to providers of data for the program, and none are contemplated.

10. Assurance of confidentiality.

Provision in the ROBO database program has been made to provide confidentiality protection for data submitted, if requested by the data provider; no providers have requested such to date; those requiring such, can, and probably do, simply not provide the data until confidentiality is no longer required, if at all.

11. Questions of sensitive nature.

There are no requests for any information of a sensitive nature involved in this program.

12. Estimate of hour burden of the information collection.

The estimated number of non-federal respondents is 40, and frequency of their annual response varies from 1 to 60, for an estimated total annual burden of 10 hours, at an estimated 5 minutes per response. These estimates are based on the 15-year experience in the use of the forms. The AD-941 form is completed by overseas workers, almost exclusively federal scientists (this form is now available for computerized completion); the AD-942 form is completed by mostly federal and some state and university quarantine facilities. The AD-943 form is completed by non-quarantine facilities, federal, state, university and private. The forms have been designed for ease of completion and all, though requiring differing information, take about the same amount of time for completion. The information for the forms is collected in the normal process of the biological control research or implementation program of the information providers, and no costs additional to those programs is entailed other than postage or telephone costs to provide the data to the ARS Biological Control Documentation Center. The estimated annual non-federal burden is calculated to be the following:

AD-941 form: 2 respondents annually; average of 3 responses/yr. (computerized or paper completion)

AD-942 form: 8 respondents annually; average of 3 responses/yr.

AD-943 form: 30 respondents annually; average of 3 responses/yr.

Total 40 respondents annually; average of 3 responses per year = 120 annual responses @ 5 min. (1/12 hr) = 10 hours

Since most of the respondents are scientists or technicians, for which an average \$25/hr wage can be estimated, the total non-federal cost is an estimated $10 \times 25 = \$250$. This is expected to change drastically when data entry via the Internet becomes possible.

13. Estimated total cost burden to respondents and recordkeepers.

There is no capital or start-up cost to the respondents.

14. Estimated annualized cost to the federal government.

The original cost of designing and printing the data collection forms was estimated to be \$3,100; annualizing this sum over the current 12-year operation of the collection activity = about \$260/yr. for the federal program. Annualized cost of data entry from the data collection forms is estimated to be 1/4 of a Scientist-Year, or about \$43,532/yr.

15. Reasons for program changes or adjustments.

There is no change from the last submission.

16. Plans for tabulation and publication.

There are no plans for tabulation and publication.

17. OMB expiration dates.

It is requested that OMB expiration dates not be included on the printed forms. So few of the forms are used during a three-year period, that it is not cost effective to print a new supply of forms every three years simply to show a new expiration date, while an adequate supply of the older forms is available.

18. Exceptions to the certification statements.

There are no exceptions to this certification.

DISCLOSURE

The reason for the request for this information is to add to the record of the introduction and release of non-indigenous organisms into the United States and territories for the purpose of biological control of pests and pollination research. The data will be included in the USDA Agricultural Research Service ROBO database ("Releases of Beneficial Organisms in the United States and Territories"), and will be available to the public via the World Wide Web on Internet. Public recording burden for this collection of information is currently estimated to average 5 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Response is entirely voluntary, and confidentiality for data submitted can be provided for a period of time as may be requested by the information provider.