

**Supporting Statement  
Phytosanitary Export Certification  
OMB 0579-0052**

**A. JUSTIFICATION**

**August 2008**

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

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), is responsible for preventing plant diseases or insect pests from entering the United States, preventing the spread of pests and noxious weeds not widely distributed within the United States, and eradicating those imported pests when eradication is feasible. The Plant Protection Act (PPA) authorizes the Department to carry out this mission.

Section 418 of the PPA authorizes the Secretary of Agriculture to certify as to the freedom of plants, plant products, or biological control organisms from plant pests or noxious weeds, or the exposure of plants, plant products, or biological control organisms to plant pests or noxious weeds, according to phytosanitary or other requirements of the countries to which the plants, plant products, or biological control organisms may be exported.

In addition to this mission, APHIS also provides export certification services to assure other countries that the plants and plant products they are receiving from the United States are free of plant diseases and insect pests.

The export certification regulations contained in Title 7 of the Code of Federal Regulations (CFR), Part 353 describes the procedures for obtaining certification for plants and plant products offered for export or re-export.

It should be noted that APHIS' regulations do not require that APHIS engage in export certification activities; however, APHIS performs this work as a service to exporters who are shipping plants or plant products to countries that require phytosanitary certification as a condition of entry.

**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.**

**Application for Inspection & Certification (PPQ Form 572)**

Anyone wishing to export domestic plants or plant products must request APHIS to perform a phytosanitary inspection to ensure that the plants or products meet the

requirements of the receiving country. The exporter requests this service by completing and submitting an Application for Inspection & Certification (PPQ Form 572). The exporter completes the “Description of Consignment” section of this form before submitting it to appropriate PPQ personnel for further processing.

### **Phytosanitary Certificate (PPQ Form 577)**

This form certifies that the domestic plants or plant products described by the exporter have been inspected according to appropriate procedures, are considered to be free from plant diseases and insect pests, and are considered to conform to the requirements of the receiving country.

### **Export Certificate for Processed Plant Products (PPQ Form 578)**

This form is designed to assist in the foreign marketing of processed and manufactured plant products not otherwise eligible for certification under the Phytosanitary Certificate (PPQ Form 577). This document affirms that processed or manufactured products described by the exporter are believed to be free from injurious plant pests based upon inspection, or based upon the processing to which the products have been subjected.

### **Phytosanitary Certificate for Reexport (PPQ Form 579)**

This form is used to certify that the foreign plants or plant products described on the form were imported into the United States from a specified country of origin, were packed in the original containers, or were repacked in new ones. This form also certifies that, based on the country of origin’s phytosanitary certificate and/or an additional inspection, the plants or plant products are considered to conform to the current phytosanitary regulations of the receiving country and have not been subjected to the risk of infection or infestation during storage in the United States.

**Recordkeeping** - Record copies of PPQ Form 577, 578, and 579 issued by Authorized Certification Officials must be maintained by the issuing office (for review by Federal employees) for 3 years. USDA-APHIS-PPQ Plant Protection Stations and designated CITES ports retain the Issuing Office copies of PPQ Form 577 and 579 for 5 years for protected plant material. This requirement does not impact the public.

**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.**

PPQ Form 572 (Application for Inspection & Certification) – This form, and instruction sheet is downloadable at: [www.aphis.gov/ppq/pim/exports/certificates&forms.htm](http://www.aphis.gov/ppq/pim/exports/certificates&forms.htm).

PPQ Form 578 (Export Certificate for Processed Plant Products) – This form will be posted at [www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm](http://www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm) and will be for viewing purposes only. It will not be automated because it is an accountable document. Therefore, there are no instructions posted with this form.

PPQ Form 577 (Phytosanitary Certificate) – This form will be posted at: [www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm](http://www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm) and will be for viewing purposes only. It will not be automated because it is an accountable document. Therefore, there are no instructions posted with this form.

PPQ Form 579 (Phytosanitary Certificate for Reexport) – This form will be posted at: [www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm](http://www.aphis.usda.gov/ppq/pim/exports/certificates&forms.htm) and will be for viewing purposes only. It will not be automated because it is an accountable document.

**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 exclusive to its mission of providing export certification services to exporters. This information 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 collects in connection with this program is becoming increasingly critical to the financial success of U.S. exporters. Many countries will no longer accept U.S. plants or plants products without USDA certification that these items are free of insect pests or plant diseases.

**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.**

Failure to provide this service would have a devastating impact on many U.S. exporters, who would no longer be able to engage in the business of exporting plants or plant products overseas.

**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.**

The information needed to certify the pest-free status of U.S. plants and plant products destined for overseas markets is collected at the time an exporter applies for APHIS' certification services. Therefore, the ambitiousness of an applicant's exporting agenda will determine how often APHIS must request information (via the certification process) from the applicant.

**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.**

The following individuals were consulted during 2008:

Ms. Bernice Slutsky  
American Seed Trade Association  
225 Reinekers Lane  
Suite 650  
Alexandria, VA 22314-2875  
(703) 837-8140

Mr. Gary Martin  
North American Export Grain Association  
1250 Eye St., NW  
Suite 1003  
Washington, DC 20005  
(202) 682-4030

Mr. Mark Powers  
Vice President  
Northwest Horticultural Council  
6 South 2<sup>nd</sup> St.  
Yakima, Washington 98901  
(509) 453-3193

On Monday, April 7, 2008, pages 18732 - 18733, 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. During that time, APHIS received one comment from an interested member of the public. This comment did not deal with information collection issues.

**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 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.**

This information collection activity asks no questions of 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.

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

$\$22.49 \times 1,775,880 = \$39,939,541.$

\$22.49 is the hourly rate derived from the U.S. Department of Labor Bureau of Labor Statistics June 2005 Report-National Compensation Survey: Occupational Wages in the United States, August 2006. See <http://www.bls.gov/ncs/ocs/sp/ncb10832.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, operation and maintenance, 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 to the Federal Government is \$ 20,459,544.46.

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

There is an adjustment of +1,177,031 hours because of an increase in the number of respondents.

There is also a program change of -1632 hours due to the deletion of PPQ Form 553 (certificate of heat treatment) and implementation of ISPM 15.

American Lumber Standard Committee (ALSC), Wood Packaging Material (WPM) and International Standards for Phytosanitary (ISPM) – The ALSC in coordination with APHIS and the WPM industry has developed an official program to implement a quality control program for the official labeling of heat treated WPM with the ISPM 15 official mark to signify compliance with the ISMP 15 standard. This has replaced the heat treatment PPQ form 553. The ALSC administers the heat treatment program. The program requires WPM producers to enroll with an inspection agency (APHIS) accredited by the ALSC. The standard mark placed on wood materials is pictured in 7 CFR 319.40-3(b)(2).

**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 under the Act.

**B. Collections of Information Employing Statistical Methods.**

Statistical methods are not used in this information collection.