

## **SUPPORTING STATEMENT JUSTIFICATION FOR ELECTRONIC ANIMAL DISEASE REPORTING SYSTEM**

### **1. Circumstances Making Collection Of Information Necessary:**

This is a request for a revision of a currently approved information collection, which addresses meat and poultry slaughter for the electronic Animal Disease Reporting System.

The Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary as provided in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.) and the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.). These statutes mandate that FSIS protect the public by ensuring that meat and poultry products are safe, wholesome, unadulterated, and properly labeled and packaged. FSIS also inspects exotic animals and rabbits under the authority of the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.).

In accordance with 9 CFR 320, 381.175, 381.180, 303.1(b)(3), 352.15, and 354.91, establishments that slaughter livestock, poultry, exotic animals, and rabbits are required to maintain certain records regarding their business operations and to report this information to the Agency as required.

For the Agency's electronic Animal Disease Reporting System (eADRS), establishments report (by shift) slaughter totals in number of heads and weight by animal category. EADRS is an information system that tracks and reports data on the number of animals slaughtered, animal diseases, and animal welfare information in the United States.

### **2. How, By Whom and Purpose Information Is To Be Used:**

The following is a discussion of the information collection activities.

For eADRS, establishments report to FSIS inspection personnel in the plant slaughter totals (by shift) in number of heads and weight by animal category. Poultry slaughter establishments complete FSIS Form 6510-7 after each shift and submit it to the Agency. Other slaughter establishments provide their business records to FSIS to report the necessary information.

FSIS uses this information to plan inspection activities, to develop sampling plans for testing, to target establishments for testing, for Agency budget planning, and in its reports to Congress. FSIS also provides this data to other USDA agencies—the National Agricultural Statistics Service, the Animal Plant and Health Inspection Service, the Agriculture Marketing Service, and the Grain Inspection, Packers and Stockyards Administration, for their publications and other functions.

There are 48,349.9 total burden hours for the information collection request relating to the eADRS.

### **3. Use Of Improved Information Technology:**

The information is reported orally or by sharing their records with in-plant FSIS inspection personnel.

### **4. Efforts To Identify Duplication:**

No other USDA agency or any other Government agency requires information relating to the slaughter of meat, poultry, exotic animals, and rabbit. There is no other available information that can be used or modified.

### **5. Methods To Minimize Burden On Small Business Entities:**

Data required of small entities are the same as for large ones. The information collections must apply to all appropriate establishments.

### **6. Consequences If Information Were Collected Less Frequently:**

To conduct the information collections less frequently will reduce the effectiveness of the meat and poultry inspection program.

### **7. Circumstances That Would Cause The Information Collection To Be Conducted In A Different Manner:**

- requiring respondents to report information to the agency more often than quarterly;

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Firms of necessity will submit data for eADRS more than once per quarter; hence, the information collection and recordkeeping activities in this submission are consistent with the guidelines in 5 CFR 1320.6.

## **8. Consultation With Persons Outside The Agency:**

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice, Notice of Request for a Revision of a Currently Approved Information (Electronic Animal Disease and Reporting System) (74 FR 55807; October 29, 2010). The Agency received one comment that did not address the information collection.

In addition, FSIS contacted three poultry establishments for comments on FSIS Form 6510-7, Poultry Lot Information. Toni Failey, (601/765-8211) Sanderson Farms, Inc., said it takes 2-3 minutes to complete the form; Regina McCray, (479/927-7617) George's Inc., said it takes 1 minute to complete the form; and, Donna Johnson, (336/838-2171) Tyson Foods, said they don't use the FSIS Form but use a spreadsheet instead to save time. Based on these comments, FSIS changed the estimated time to

complete the form from 15 minutes to 2 minutes.

**9. Payment or Gifts to Respondents:**

Respondents will not receive any gifts or payments.

**10. Confidentiality Provided To Respondents:**

No assurances other than routine protection provided under the Freedom of Information Act have been provided to respondents.

**11. Questions Of A Sensitive Nature:**

The applicants are not asked to furnish any information of a sensitive nature.

**12. Estimate of Burden**

The total burden estimate for the reporting requirements associated with this information collection is 48,349.9 hours.

The Agency estimates that 1,341 establishments will respond 500 times annually taking 5 minutes for livestock and exotic animals and 2 minute for poultry slaughter establishments to supply the information needed for eADRS for a total of 48,349.9 hours.

**ELECTRONIC ANIMAL DISEASE REPORTING SYSTEM**

Type of Establish-ment	No. of Respon-dents	No. of Res-ponses per Responde-nt	Total Annual Response s	Time for Response in Mins.	Total Annual Time in Hours
Poultry	301	500	150,500	2	5,016.6

Type of Establishment	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Livestock	806	500	403,000	5	33,583.3
Exotic	234	500	117,000	5	9,750
All Ests.	1,341	500	670,500	5	48,349.9

The cost to the respondents is estimated at \$1,692,246.5 annually. The Agency estimates that it will cost respondents \$35 an hour in fulfilling these paperwork requirements. Respondents will spend an annual total of 48,349.9 hours and \$1,692,246.5.

### **13. Capital and Start-up Cost and Subsequent Maintenance**

There are no capital and start-up costs and subsequent maintenance burdens.

### **14. Annual Cost To Federal Government:**

The cost to the Federal Government for these information collection requirements is \$70,000 annually. The costs arise primarily from the time spent by FSIS staff reviewing the eADRS data. The Agency estimates a cost of \$35 per hour.

### **15. Reasons For Changes In Burden:**

This is a revision of a currently approved collection. The burden hours increased from 23,180 to 48,350. The change in the burden hours is due to underestimating the number of establishments that report to eADRS and also an increase in the estimate of response time for plant managers to orally give

data to inspectors from 2 minutes to 5 minutes for livestock and exotic animals' slaughter, thus causing the overall increase to be an adjustment.

**16. Tabulation, Analyses And Publication Plans:**

There are no plans to publish the data for statistical use by FSIS.

**17. OMB Approval Number Display:**

The OMB approval number will appear on required FSIS forms. FSIS requests that it not be required to put the expiration date of the information collection on the form. Being required to put the expiration date on the form would place a burden of the Agency because 1) it would require FSIS to print new forms with the expiration date on them and would render the forms unusable in three years; 2) at the end of the approval period FSIS could not print up new forms until OMB gave a new expiration date causing unnecessary delay; and, 3) there is often a time lapse of several months between the date when the expiration expires and the time when OMB will finally give (usually) a three year approval to the extension or revision causing an almost impossible situation of attempting to having forms with the correct expiration date on them.

**18. Exceptions to the Certification:**

There are no exceptions to the certification. This information collection accords with the certification in item 19 of the OMB 83-I.