

SUPPORTING STATEMENT - OMB NO. 0579-0048
REQUIREMENTS FOR POULTRY AND HATCHING EGGS FOR EXPORT

June 23, 2010

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.

The Animal Health Protection Act (AHPA) of 2002 is the primary Federal law governing the protection of animal health. The law gives the Secretary of Agriculture broad authority to detect, control, or eradicate pests or diseases of livestock or poultry. The Secretary may also prohibit or restrict import or export of any animal or related material if necessary to prevent the spread of any livestock or poultry pest or disease.

The AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, the Farm Security and Rural Investment Act of 2002.

Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the Animal and Plant Health Inspection Service (APHIS') ability to compete globally in animal and animal product trade.

In connection with this mission, the USDA's APHIS facilitates the export of poultry and hatching eggs from the United States by maintaining information regarding the import requirements of APHIS' trading partners.

Most countries require certification that U.S. poultry and hatching eggs are free of disease. This certification must carry the USDA seal and be endorsed by an authorized Veterinary Services (VS) veterinarian. VS Form 17-6, Certificate for Poultry and Hatching Eggs for Export, is used to meet these requirements. With this certificate, exporters can attest to the health of the poultry and hatching eggs they are offering for export. The certification is crucial to the U.S. exporter's ability to successfully export poultry and hatching eggs.

APHIS is asking OMB to approve, for 3 additional years, the use of information collection activities associated with its efforts to monitor U.S. export of poultry and hatching eggs.

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

Owners and exporters of poultry and hatching eggs provide health and identification information for the VS-17-6. The certificate is then endorsed or cosigned by a Federal veterinarian. The collection of this information stops 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 also satisfies the import requirements of the receiving countries, thereby protecting and encouraging trade with the United States. If this certificate 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.

The certificate must physically accompany the shipment and requires an original signature from the authorizing veterinarian to be valid. The certificate is therefore not a candidate for electronic transmission.

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 APHIS collects in connection with this effort is not available from any other source. APHIS is the only Agency responsible for ensuring the health status of poultry and hatching eggs leaving the United States.

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

The information APHIS collects is the absolute minimum needed to certify the health status of poultry and hatching eggs exported from the United States. APHIS has no small entities involved with this information collection.

6. Describe the consequence 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.

If the information was collected less frequently or not collected, APHIS would be unable to certify the health status of poultry and hatching eggs exported from the United States. This would cause serious economic consequences for the U.S. poultry industry, which would be unable to export poultry and hatching eggs.

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.

- **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.**

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.

During 2010, APHIS spoke to the following individuals concerning the information collection activities associated with this program:

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On Friday, July 30, 2010, page 44935, APHIS published in the Federal Register, a 60- day notice seeking public comments on APHIS' plans to request a 3-year extension of this collection of information. During that time APHIS received one comment from an anonymous person from NJ stating her concerns about the maltreatment of birds and chickens. This comment has no relevance to the purpose of the collection.

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, owners of poultry and hatching egg operations, and poultry and hatching egg exporters.

• 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 \$164,322. APHIS arrived at this figure by multiplying the total burden hours (5,100) by the estimated average hourly wage of the above respondents (\$32.22.).

The average hourly rate is derived from the U.S Department of Labor; Bureau of Labor Statistics May 2009 Report – National Compensation Survey: Occupational Employment and Wages, May 2008. See <http://www.bls.gov/oes/#tables>.

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.

No annual cost burden is associated with capital and startup 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 \$272,611.68 (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 of +600 responses resulting in an increase of +300 burden hours. Although the number of respondents is unchanged, the respondents are exporting more poultry and hatching eggs from the United States than during the previous renewal of this collection.

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

APHIS has no plans to publish the 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.

This form is serially numbered to track the movement of the shipment for regulatory purposes. Therefore, APHIS is seeking approval to not display the OMB expiration date on VS Form 17-6.

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

APHIS can certify compliance with all provisions in the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed in this information collection.