

SUPPORTING STATEMENT 0579-0165
IMPORTATION OF HORSES, RUMINANTS, SWINE, AND DOGS; INSPECTION AND
TREATMENT OF SCREWORM

March 3, 2010

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 also may 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 enhancing APHIS' ability to compete in the world market of animal and animal product trade.

The regulations under which APHIS conducts its disease prevention activities are contained in title 9, chapter 1, subchapter D, parts 91 through 99 of the *Code of Federal Regulations*. These regulations govern the importation of animals, birds and poultry, certain animal and poultry products, and animal germplasm.

Screwworm is a pest native to tropical areas of South America, the Indian subcontinent, Southeast Asia, tropical and sub-Saharan Africa, and the Arabian Peninsula that causes extensive damage to livestock and other warm-blooded animals. Screwworm was eradicated from the United States in 1966. However, in July 1999, and again in February and March 2000, screwworm larvae were found in horses imported into the United States from Venezuela and Argentina.

APHIS regulations ensure that horses, ruminants, swine, and dogs imported into the United States from regions of the world where screwworm is known to exist are inspected and, if necessary, treated for screwworm infestation. These animals must also be accompanied to the United States by a health certificate stating that the above actions were taken. APHIS requires the following documents to import horses, ruminants, swine, and dogs from regions where screwworm is known to exist: (1) an application for import or in-transit permit (VS 17-129); and (2) the health certificate.

APHIS is asking OMB to approve, for an additional 3 years, its use of these information collection activities in connection with its program to prevent the introduction of screwworm into the United States.

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.

Application for Import or In-Transit Permit for Horses (VS Form 17-129)

Anyone wishing to import horses into the United States must apply for and obtain from APHIS a VS Form 17-129, Application for Import or In-Transit Permit (Animals, Animal Semen, Animal Embryos, Birds, Poultry, or Hatching Eggs). The importer must describe the type, number, and identification of the animals or products to be exported. He/she must also list the origin, intended date and location of arrival, routes of travel, and destination of the animals or products. APHIS uses this information to track, identify, and monitor animals and products entering the United States and to safeguard U.S. livestock. The permit information is valid for 14 days for horses. It can only be used for the animals listed on the application.

APHIS also uses the information in the permit application to issue a VS Form 17-135, U.S. Permit to Import, to the importer, which includes statements of import requirements with which the importer must comply to import horses. APHIS completes VS Form 17-135 to eliminate burden on the public.

Application for Import or In-Transit Permit for Ruminants/Swine (VS Form 17-129)

Anyone wishing to import ruminants and swine into the United States must apply for and obtain from APHIS a VS Form 17-129, Application for Import or In-Transit Permit (Animals, Animal Semen, Animal Embryos, Birds, Poultry, or Hatching Eggs). The importer must describe the type, number, and identification of the animals or products to be exported. He/she must also list the origin, intended date and location of arrival, routes of travel, and destination of the animals or products. APHIS uses this information to track, identify, and monitor animals and products entering the United States and to safeguard U.S. livestock. The permit information is valid for 30 days for both ruminants and swine. It can only be used for the animals listed on the application.

APHIS also uses the information in the permit application to issue a VS Form 17-135, U.S. Permit to Import, to the importer, which includes statements of import requirements with which the importer must comply to import ruminants and swine. APHIS completes VS Form 17-135 to minimize burden on the public.

Health Certificates for Horses

Horses entering the United States from regions where screwworm is known to exist must be accompanied by a certificate issued, completed, and signed by a full-time salaried veterinary official of the exporting country. The certificate must state that the animals have been thoroughly examined, that they have been treated with ivermectin, that any visible wounds have been treated with coumaphos, and that the animals appear to be free of screwworm. APHIS inspectors review the health certificate to ensure that the animals are in compliance and then return the health certificate to the importer for his/her personal use. APHIS does not require the importer to maintain records of this form. The information helps APHIS safeguard U.S. livestock against screwworm infestation.

Health Certificates for Ruminants/Swine

Ruminants and swine entering the United States from regions where screwworm is known to exist must be accompanied by a certificate issued, completed, and signed by a full-time salaried veterinary official of the exporting country. The certificate must state that the animals have been thoroughly examined, that they have been treated with ivermectin, that any visible wounds have been treated with coumaphos, and that the animals appear to be free of screwworm. APHIS inspectors review the health certificate to ensure that the animals are in compliance and then return the health certificate to the importer for his/her personal use. APHIS does not require the importer to maintain records of this form. The information helps APHIS safeguard U.S. livestock against screwworm infestation.

Health Certificates for Dogs

Dogs entering the United States from regions where screwworm is known to exist must be accompanied by a certificate issued, completed, and signed by a full-time salaried veterinary official of the exporting country. The certificate must state that the animals have been thoroughly examined, that they have been treated with ivermectin, that any visible wounds have been treated with coumaphos, and that the animals appear to be free of screwworm. APHIS inspectors review the health certificate to ensure that the animals are in compliance and then return the health certificate to the importer for his/her personal use. APHIS does not require the importer to maintain records of this form. In the case of dogs that will be used for handling livestock, the certificate must also state that the dogs were tested and, if necessary, treated for cestodes (commonly found in dogs) within 5 days preceding shipment to the United States. The information helps APHIS safeguard U.S. livestock against screwworm infestation.

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 VS 17-129 form, Application for Import or In-Transit Permit can be completed electronically but cannot yet be submitted electronically because of technology limitations. It's available on APHIS' Web site at http://www.aphis.usda.gov/import_export/forms.shtml

The health certificate requires an original signature and thus is not a candidate for electronic submission.

APHIS is creating a database called Veterinary Services Process Streamlining (VSPS) that will help with archiving information and managing data. The Agency is reviewing ways to automatically populate forms with information to make data entry on critical forms as minimal as possible.

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 program is the absolute minimum necessary to effectively ensure that animals from certain regions pose a negligible risk of introducing screwworm into the United States, and is not available from any other source. APHIS is the only Agency responsible for preventing the introduction of exotic animal diseases and parasites into the United States.

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

About 98 percent of the respondents to this information collection are small businesses. They are only affected in this collection by the VS Form 17-129. The importer is responsible for completing the form as he/she is the only person who has access to the information required to do so.

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 far less able to ensure that horses, ruminants, swine, and dogs imported into the United States are infested with screwworm. Such a development would make a screwworm incursion much more likely, and would damage the U.S. equine, cattle, and swine industries by lessening or barring critical export 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.

- **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.**

The 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.

In 2009, APHIS engaged in productive consultations with the following individuals in connection with the information collection requirements associated with this program:

James A. Black, Jr.
Martinair Cargo
8750 NW 36th St., Suite 300
Doral, FL 33178
305-704-9934

Keith Kleine, President
American Association of Equine Practitioners
4075 Iron Works Parkway
Lexington, KY 40511
859-233-0147

Eileen I. Zahariou
Mersant Intl. Ltd.
Worldwide Horse Transporters
158-12 Rockaway Blvd.
Jamaica, NY 11434
Tel: 347-632-3004
Fax: 718-712-0771

On Friday, June 4, 2010, pages 31745-31746, 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 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 full-time salaried veterinary officials of the exporting regions.

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

APHIS estimates the total annualized cost to the respondents to be \$ 2,873.00. Respondents are full-time, salaried veterinary officers employed by the government of Mexico and U.S. importers. APHIS arrived at this figure by multiplying the total burden hours (85 hours) by the estimated

average hourly wage of the respondents (\$33.80) (veterinary officer respondents (\$39.90) and the U.S. importer respondents (\$27.70), taken from <http://www.indeed.com/salary?q1=veterinarian&l1=Mexico+City%2C+Mexico> and http://www.bls.gov/oes/current/oes_nat.htm)

13. Provide estimates of the total annual cost burden to respondents or record keepers 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 \$40,976.31 (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-I.

There is a program change of +55 burden hours and an adjustment of -10 burden hours. The number of respondent increased from 40 to 83.

The program change is a result of adding VS Form 17-129 to this collection which was inadvertently omitted from the previous collection. With the addition of this form there was an increase of +222 responses and +55 burden hours.

There is an adjustment decreasing the number of responses by -42 responses causing a decrease in the number of burden hours to -10. The adjustment is due to the decrease in the number of times the respondents responded for the certificates.

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

APHIS has no plans to publish 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.

The VS Forms 17-129 is used in multiple OMB-approved collections; therefore APHIS is seeking approval to not display the OMB expiration date on these forms.

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

APHIS can certify compliance with all provisions under the Act.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not employed in this information collection activity.