

1 Supporting Statement

MINK SURVEY

OMB No. 0535-0212

A. JUSTIFICATION

This docket is asking for an extension of 3 years to an ongoing annual data collection and publication of Mink data.

- 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 primary function of the National Agricultural Statistics Service (NASS) is to prepare and issue official State and national estimates of crop and livestock production, disposition, and prices. Mink figures are a basic part of the NASS strategic plan to cover all agricultural receipts. There is no other accurate source for this type of information. Before 1970, efforts were made within the industry to obtain information on a voluntary basis. The results were fragmentary with limited response and the findings were inconclusive. Therefore, Congress directed NASS to conduct the first mink survey in 1970 and the agency has conducted a survey every year since then. Figures on mink production are published for the 13 major States that account for nearly 100 percent of the total U.S. pelt production; estimates for the remaining States are published in a combined "Other States" category.

General authority for these data collection activities is granted under U.S. Code, Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collecting of statistics ... and shall distribute them among agriculturists."

- 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.**

The mink program is an annual enumeration of all known mink operations in the 50 States to obtain the number of mink pelts produced in the past season and

the number of females bred for the current season, by color class. Data reported on this survey will be used by NASS to calculate:

- mink pelts produced by color class,
- number of females bred to produce kits the following year,
- number of mink farms or ranches,
- average marketing price, and
- value of pelts produced.

This data is disseminated by NASS in the *Mink* report and is used by the U.S. Government and other groups as described below.

Federal Government: The USDA's Economic Research Service uses the data to help determine total value of sales and total cash receipts from agriculture at the State and U.S. levels. The Commerce Department's Office of Consumer Goods uses the report to answer inquiries from Congress. The Foreign Agricultural Service (FAS) which administers the targeted Export Assistance Program authorized by the Food Security Act of 1985 finds the annual *Mink* production report very useful because most of the U.S. mink production is exported. The report provides FAS marketing specialists data on the availability of pelts when working with the industry to promote pelt exports, detects trends in the U.S. mink industry relative to other supply sources, provides a basis for projecting future availability, and provides information to respond to inquiries from other government agencies and commercial traders.

State Governments: State Departments of Agriculture in Idaho, Illinois, Iowa, Michigan, Minnesota, Montana, Ohio, Oregon, Pennsylvania, South Dakota, Utah, Washington, and Wisconsin utilize information from this report to:

- administer voluntary fur farm licensing programs,
- determine total income from agriculture,
- provide an indicator for fish and meat animal products,
- administer health regulations for mink, and
- refute the misconception that most mink fur comes from trapping.

The states included in the "Other States" category are: Indiana, Maine, Massachusetts, New Hampshire, New York and North Carolina.

Farmers: Mink produce kits (offspring) once a year, which means farmers must plan years in advance for the size of their future operations and color of mink they will raise. The *Mink* report clearly details production of various mink colors generically so that breeders know how many kits of each color were produced in the preceding year and how many females were bred to produce kits of each color in the current year. Over-production within a color can result in flooding the

market and reduced returns to growers. With the *Mink* report, individual farmers can make their own informed decisions.

Agribusiness Suppliers: The suppliers of animal feed, building materials, and other goods utilize the *Mink* report to anticipate the total requirements in each category and subcategory of products. The U.S. mink industry consumes millions of dollars worth of fish and fish byproducts, dairy products and dairy byproducts, poultry, and meat byproducts each year. Animal health product manufacturers can anticipate vaccine and other product requirements by studying data in the *Mink* report.

American Agri-Women: This is a national farm women's advocacy organization for Agriculture. The group takes an interest in the fur farm industry' contribution to the overall agricultural economy at the national level, especially as it displays common concerns with other livestock sectors over animal rights issues.

Importance to the Fur Industry: The industry association, Fur Commission USA, uses the information from this survey to build and update industry information which is crucial for the Commission to be effective. Cooperative marketing organizations within the mink farming industry rely on the USDA statistics in planning their promotional budgets and campaigns. Employers in the dressing (tanning) trade, brokers and other intermediate merchants, fur garment manufacturers and retailers, and union groups in the fur trade utilize the annual *Mink* report in planning their capital expenditures, labor requirements, and other business decisions.

Animal Rights Groups and Others: Animal Rights groups are users of the Mink report, they make frequent telephone calls to the USDA inquiring about pelt production. Foreign interests also use the mink report.

- 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.**

Web-based data reporting is available for this survey; less than 5 percent of the respondents have taken advantage of this technology.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The National Agricultural Statistics Service cooperates with State departments of agriculture and land grant universities to conduct agricultural surveys. The surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Mink list building includes checks for duplication.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Information requested can be provided with a minimum of difficulty from normal operating records. Approximately 92% of the operations are classified as small operations.

- 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.**

Conducting this survey less frequently than annually would eliminate data needed to keep Federal and State governments, agribusiness suppliers, the fur industry, and other data users abreast of changes within this industry and would erode our list frame.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances associated with this survey.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on July 09, 2012, on page 40323. There was one public comment which is attached to this renewal docket.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

The Fur Commission USA reviews and recommends changes to the questionnaire. In addition, this year the commission provided a letter of endorsement to accompany the questionnaire.

9. Explain any decision to provide any payment or gift to respondents.

There are 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.

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905 and Title 7, Section 2276 provide confidentiality for reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should 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. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Total hours of burden are based on calculations in the table below. There are no content changes from the previous approval. The average completion time allows for reference to normal operating records if needed.

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 89 hours is multiplied by \$24 per hour, for a total cost to the public of \$2,136.

Estimated Sample Size and Respondent Burden for 2012 - 2014											
Survey	Sample Size	Freq	Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq x Count	Min./ Nonr.	Burden Hours	
Mnk Survey - First Mailing	350	1	140	140	10	24	210	210	2	7	31
Mnk Survey - Second Mailing	210	1	65	65	10	11	145	145	2	5	16
Follow-up Enumeration	145	1	75	75	10	13	70	70	2	2	15
Mnk Price Survey	2	1	2	2	20	1	0	0	2	0	1
Pre-Survey Letter and Publicity Materials	350	1	280	280	5	24	70	70	2	2	26
Total	350		280	562		73	70			16	89

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

The cost to the Federal government for the annual Mink Survey is \$100,000. Most of the cost is personnel cost for data collection; the remainder is for supplies, postage, computer processing, and similar items.

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

The expected burden is 89 hours. This figure is down slightly from the previously approved figure of 99 hours. The number of respondents has gone from 362 down to a current 350 operators. These changes are due to a slight adjustment in the estimate of sample size for the next 3 years. For the Mink Production Survey, Field Offices will continue doing two mailings with either a phone or personal visit to collect the data from non-respondents; allowing NASS to continue with the high response rate and minimizing costs.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Questionnaires are initially mailed to all potential producers in late April or early May. A second mail request will be sent in mid May to non-respondents. Mail non-respondents are telephoned in late May or early June. In cases where producers cannot be reached by telephone, personal contacts are made the last week of May. Electronic Data Reporting (EDR) or web based survey is available throughout the entire data collection period. The Mink Dealer Survey is mailed out the last week in June.

All reported data are analyzed for unusual values. Data from each operation are compared to operating profile and to trends from similar operations. Inaccessible operations or refusals are accounted for on an individual basis through contacts with county agents or other informed persons, expansion of reported data, or imputation based on historical data.

The survey is summarized in each Field Office; recommendations, comments, and previous year revisions are transmitted over a computer network to HQ for inclusion in the annual *Mink* production publication. Published figures are only for operations in production that year; operations with capacity but no production are not included in counts. In order to include price information from marketing associations which is not available until the last week of June, the publication is not released until mid-July. Respondents who indicated on the questionnaire that they would like to receive the survey results are mailed a copy.

Pelt Production:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1106>

- 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.**

There is no request for approval of non-display of the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.**

There are no exceptions to the certification statement.

August 2012