

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Survey of Non-Tariff Trade Barriers to
the U.S. Environmental Industry
OMB Control No. 0625-0241

A. JUSTIFICATION

This request is to extend the Office of Management and Budget approval. The title of this information collection has been changed from ITA Environmental Technologies Non-Tariff Barriers Survey.

1. Explain the circumstances that make the collection of information necessary.

The Office of Energy and Environmental Industries (OEEI) is the principal resource and key contact point within the U.S. Department of Commerce (DOC) for U.S. energy and environmental technology companies. OEEI's goal is to facilitate and increase exports of environmental technologies, goods and services by providing support and guidance to U.S. exporters.

The environmental technologies industry has cited the proliferation of non-tariff barriers as a factor that is making U.S. exporting more difficult. This factor has been cited across all subsectors of environmental technologies products and all global geographic regions. The collection of information related to the experience of U.S. exporters with regard to these non-tariff measures is essential to the mission of OEEI. It allows accurate market analysis as well as support to industry in its export efforts and to the U.S. government in its trade negotiation efforts. This capability is especially important in light of U.S. efforts to negotiate a number of bilateral and regional trade agreements that feature the goal of liberalized environmental trade. OEEI has played a significant role in bilateral U.S. trade agreements with Singapore, Morocco, Bahrain, Chile, and more. This capability will also be important to the U.S. Department of Commerce's efforts to analyze and otherwise provide support to U.S. participation in emerging international global climate change and greenhouse gas emissions control initiatives. Collection of this information will allow OEEI to retain its ability to provide the most accurate and effective support to these and other environmental industries efforts in the future.

The survey ITA-4150P, Survey of Non-Tariff Trade Barriers to the U.S. Environmental Industry, will be used to collect this information.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information collected via this survey will be used to assist DOC in its efforts to analyze the competitive effects of trade policies and proposals for the U.S. environmental technologies industry.

OEEI's goal is to facilitate and increase exports of environmental goods and services by providing support and guidance to U.S. exporters. One aspect of this is to help reduce tariff and non-tariff trade barriers. OEEI works closely with other agencies including the Department of State and the Office of the U.S. Trade Representative on trade negotiations and trade liberalization initiatives. The information collected by this survey will be used to support initiatives by these and other U.S. government agencies such as: Environmental Protection Agency, Department of Defense, Department of Energy, Department of Treasury, Export-Import Bank, Overseas Private Investment Corporation, Small Business Administration, Trade and Development Agency, and the Agency for International Development to maintain a current, relevant snapshot of non-tariff measures that create trade barriers for U.S. exports of environmental goods and services.

OEEI staff, on occasion, will advise clients in speeches and presentations that the form exists, but most respondents are aware of the survey while visiting the website.

The results of the survey will not be reported to the public in any tabular form. However, information from the survey becomes a part of OEEI's analysis of the industry and may be included as a part of that analysis in various presentations to industry and interagency audiences.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The survey is available and can be submitted using ITA's web site (www.trade.gov/envirotech).

Relying on the web site allows us to drastically reduce the paperwork that would otherwise be required. Collecting the information via the web site allows users to complete the form easily, increasing the probability that concerned U.S. exporters will reply. This method of collection may be augmented by hard copy forms that will be distributed periodically at major environmental technologies trade events. Respondents will be invited to complete these forms and send them back via fax.

4. Describe efforts to identify duplication.

The survey form was developed and is mainly distributed, aggregated, analyzed, and reported by OEEI. No other agency collects identical information. In fact, the information collected via this survey informs OEEI's input into the initiatives of other agencies and interagency processes.

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

The use of standardized form, criteria, and instructions help ensure that the burden on small businesses is minimized. In addition, the amount of information requested has been reduced to the minimum necessary to evaluate viable applications. This was ensured, in part, by consulting with a number of small businesses in developing the information and format of the survey form.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Non-tariff measures can include technical standards, product design requirements, licensing regulations, and more. It is an area as dynamic as the development of the international economies that might use them. The regular collection of this information is necessary to keep OEEI's understanding of this critical international trade issue relevant and accurate. Not collecting this information or collecting less frequently would leave OEEI, and the agencies that seek its input, operating without a knowledge base while trying to address non-tariff trade barriers or negotiate environmental agreements, trade agreements featuring environmental liberalization, etc.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Information collected via this survey will inform the DOC's efforts to analyze the competitive affects of trade policies and proposals for the U.S. environmental technologies industry.

8. Provide information of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A notice soliciting comments from the public was published March 7, 2013 (Volume 78, Number 45, Pages 14770-14771), in the Federal Register. No comments from the public were generated from this announcement.

This form was developed through consultation with other agencies and offices of the U.S. government and private industry. A number of environmental firms of various sizes and specialties assisted with the crafting of the content and design of this survey.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

The information collected will remain business confidential and will be used only by ITA staff in assessing the applicant's experience as a part of the broader environmental industry or one of that industry's specific subsectors.

The following information is stated on the survey –

'Freedom of Information Act: Information submitted to the government may be subject to disclosure pursuant to the Freedom of Information Act. However, all confidential commercial information will be protected from disclosure to the extent permitted by law. You will be notified in advance if any such information submitted by you becomes subject to release pursuant to a Freedom of Information Act request.'

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The survey does not contain questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Annual Burden Hours: 33.

Time to Complete	No. Respondents	No. Responses	Total Hours
10 minutes	200	200 (1 each)	33

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

None.

14. Provide estimates of annualized cost to the Federal government.

The average public sector salary for persons processing the application is \$45.00 per hour.

Cost to Government: 100 Total Hours x \$45 Average Salary = \$4,500

15. Explain the reasons for any program changes or adjustments reported.

None.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results may be tabulated and reported as a collective set of data. Such reports would be informally published on the environmental industries home page on the ITA web site (www.trade.gov/envirotech) or provided in tabulated form to other U.S. government agencies as a part of policy processes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The OMB number and expiration date will be displayed on the form.

18. Explain each exception to the certification statement.

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methodologies.