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

March 5, 2015

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 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 91through 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: (l) 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.

APHIS uses the following information activities to 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.

Application for Import or In-Transit Permit for Horses, Ruminants, and Swine (VS Form 17-129) – (Business)

Anyone wishing to import ruminants or 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 form is also required for the importation of horses from regions affected with contagious equine metritis and for horses imported from Central America and the West Indies (9 CFR 93.304 and 9 CFR 93.319, respectively). 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. The permit can only be used for the animals listed on the application. 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 and for 30 days for both ruminants and swine. The form is not required for the importation of dogs.

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.

Health Certificates – (Federal Government)

Horses, ruminants, swine, and 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. APHIS does not require the importer to maintain records of this form. The information helps APHIS safeguard U.S. livestock against screwworm infestation.

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.

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.

VS Form 17-129 is available to the public electronically at http://www.aphis.usda.gov/library/forms/pdf/vs17_129.pdf and can be submitted by fax or mail. The application can also be submitted through the e-Permits system found at: http://www.aphis.usdu.gov/permits/login_epermits.shtml

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

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 at all, APHIS would be far less able to ensure that horses, ruminants, swine, and dogs imported into the United States are not 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.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines 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 2013, APHIS engaged in productive consultations with the following individuals in connection with the information collection requirements associated with this program:

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On Tuesday, September 24, 2013, pages 58511-58512, 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. During this time APHIS received no comments.

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. Any and all information obtained in this collection shall not be disclosed except in accordance with 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 13of OMB Form 83-1.

See APHIS Form 71. Burden estimates were developed from discussions with full-time salaried veterinary officials of the exporting regions and with animal importers.

•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 $2,527.82. Respondents are fulltime salaried veterinary officers employed by foreign governments and U..S. importers. APHIS arrived at this figure by multiplying the total burden hours 97 by the estimated average hourly wage of the respondents $26.06 (foreign veterinary officer respondents ($35.65) and the U.S. importer respondents ($16.47), taken from http://www.salaryexpert.com and from the Bureau of Labor Statistics' 2012 Occupational Employment Statistics available at: http://www.bls.gov/oes/current/oes452021.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 $275,827 (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-l.

ICR Summary of Burden: N

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	1,937	0	0	1,597	0	340
	1937	0	0	1597	0	340
Annual Time Burden (Hr)	485	0	0	400	0	85
	485	0	0	400	0	85
Annual Cost	0	0	0	0	0	0

Burden ($)	0	0	0	0	0	

There is an adjustment increase of +9 respondents and +1,597 annual responses resulting in an increase of +400 total burden hours.

The adjustments are due to an increase in the number of respondents and responses for Health Certificates for dogs due an increase in the number of individuals interested in importing dogs into the US. Also the number of Health Certificates for horses has increased because there was an increase in the number of times a respondent requested to import horses into the US.

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.

The VS Form 17-129 is used in multiple OMB-approved collections; therefore, APHIS is seeking approval not to display the expiration date on this form.

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 activity.