Supporting Statement Domestic Quarantines OMB Number: 0579-0088

July 20, 2015

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) is responsible for preventing plant pests and noxious weeds from entering the United States, preventing the spread of plant pests and noxious weeds not widely distributed in the United States, and eradicating those imported pests when eradication is feasible.

Under the Plant Protection Act (7 U.S.C. 7701 – <u>et.seq.</u>), the Secretary of Agriculture is authorized to prohibit or restrict the importation, entry, or movement of plants and plant pests to prevent the introduction of plant pests into the United States or their dissemination within the United States.

Plant Protection and Quarantine (PPQ), is responsible for implementing this Act and does so through the enforcement of its domestic quarantine regulations, contained in Title 7 of the Code of Federal Regulations (CFR), Part 301.

APHIS' implementation of these domestic quarantines often requires APHIS to collect information from a variety of individuals who are involved in growing, packing, handling, transporting and importing plant products. The information APHIS collects serves as the supporting documentation required for the issuance of PPQ forms and documents that authorize the movement of regulated articles, and are vital in helping APHIS ensure that injurious plant diseases and insect pests do not spread within the United States.

APHIS is asking the Office of Management and Budget (OMB) to approve for an additional three years, its use of these information collection activities associated with its efforts to prevent the spread of insect pests within the United States.

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.

Information is collected from growers, packers, and shippers of regulated articles to ensure that the articles, when moved from a quarantined area, do not harbor injurious plant diseases and insect pests.

PPQ officials, State plant health authorities, and other cooperators conducting regulatory activities in connection with various quarantines, collect information in various ways. Information is collected by interviewing growers and shippers at the time the inspections are conducted and by having growers and shippers of plants and plant products for export complete an application for a transit permit. The information obtained is used to determine compliance with regulations and for issuance of forms, permits, certificates, and other required documents.

For the Gypsy Moth (GM) Program, PPQ officials deliver training (via workshops) to State cooperators as well as movers of logs, pulpwood, rootless trees, and other commodities to enable them to become qualified certified applicators. A qualified certified applicator inspects articles and issues outdoor household article documents and certificates to allow the movement of articles regulated for GM.

<u>Certificates</u> - Certificates are used to facilitate the movement of regulated articles that are certifiable under the provisions of the various domestic plant quarantines. The certificates are issued at the point of origin. Certificates issued under these regulations are:

PPQ Form 537 (Limited Permit of Movement of Noncertified Articles – A pressure-sensitive permit applied to containers of articles that do not necessarily require inspection at destination. The State plant protection official in the host State may elect not to inspect based on the size of the shipment and the date the regulated article was treated. This form is used in the Black Stem Rust (BSR), GM, Pine Shoot Beetle (PSB), Pink Bollworm (Pinkbw), Witchweed (WW), Imported Fire Ant (IFA), Golden Nematode (GN), Sugarcane Disease, European Larch Canker (ELC), Oriental Fruit Fly (Oriental FF), Mediterranean Fruit Fly (Med FF) and Asian Long-horned Beetle (ALB) information collections.

PPQ Form 540 (Federal Certificate) – A paper document (three copies) used to certify bulk shipments of regulated articles. PPQ officials and State cooperators review forms issued to ensure regulated articles are in compliance with Federal or State regulations. This form is used in the BSR, GM, PSB, ALB, Med FF, WW, IFA, GN, Sugarcane, ELC, Oriental FF, and *P. ramorum* information collections.

PPQ Form 527 (Sticky Back Certificate) – A pressure-sensitive certificate used to certify individual articles. These certificates may be applied by the package owner. This form is used in the GM, PSB, ALB, Med FF, IFA, GN, Sugarcane, ELC, Oriental FF and Emerald Ash Borer (EAB) information collections.

PPQ Form 530 (Limited Permit): Limited permits are used to authorize movement of regulated articles that are not certifiable to specified destinations for processing, treatment, or utilization.

A paper document (four parts) used to authorize the movement of regulated articles to a specified destination and allows further inspection at destination. The decision to perform further inspections will be made by the State plant protection official in the host State. The decision to inspect is prompted by date of issuance and results of inspection prior to transport. This form is used in the BSR, PSB, Pinkbw, citrus canker (CC), IFA, GN, ELC, Oriental FF, ALB and EAB information collections.

PPQ Form 543 Black Stem Rust Inspector's Report - Used during inspection to record the source of stock purchased during the year and to assist in the inspection for rust resistance. If the stock is questionable, it is recorded as such as the specimen is forwarded to the Federal Rust Laboratory for a rust susceptibility test. The inspector also uses the form to recommend whether the establishment should be included on the eligibility list for permits and interstate shipping. This is used for the BSR information collection.

PPQ Form 523 Emergency Action Notification: Used when an emergency action must be taken on a shipment which allows CBPAI and/or PPQ to communicate the need for specific action on a shipment to interested parties.

PPQ Form 518 Report of Violation: as relates to CITES is used to report violations of 7CFR 355, 50CFR 23, and 50CFR 24, and becomes part of the total case file together with the Officer's Statement. This is used in the Imported Fire Ant information collection.

PPQ Form 519 (Compliance Agreements): The compliance agreement specifies procedures and precautions that the grower, handler, or mover must follow to prevent the spread of insect pests and diseases from spreading to non-infested areas of the United States. By signing a compliance agreement with APHIS, the applicant agrees to comply with the prescribed regulations and stipulations when moving or treated regulated items. The stipulations vary from program to program and by type of establishment and are usually written prior to contact with the establishments. The time involved with the respondent depends upon the number and complexity of the stipulations written for the specific type of establishment. This form is used in the *P. ramorum* and ALB information collections.

Documents Sent to State Plant Regulatory Official - Any qualified certified applicator who issues a certificate or outdoor household article document must, at the time of issuance, send a copy of the certificate or outdoor household article document to the State Plant Regulatory Official for both the originating State and the destination State.

<u>Inspections</u> – Inspections are conducted by PPQ inspectors and State inspectors as part of enforcing domestic quarantines. These inspections ensure that:

- The article has been treated under the direction of an inspector to destroy the pest in accordance with the treatment manual; or
- The article has been grown, produced, manufactured, stored, or handled in such a
 manner that it will not transmit infestation as determined by an inspector. Based
 upon the results of these inspections, an inspector may issue certificates or other
 required documents.

Specifically for GM, a qualified certified applicator will issue certificates for the interstate movement of any outdoor household articles or mobile homes, if it is determined that the articles are inspected and found free from any life stage of the GM, or the articles have been treated by or under the direct supervision of a qualified certified applicator. This individual must provide the originating State and the destination State with copies of all certificates and outdoor household article documents issued.

An outdoor household article document may be issued by the person moving the outdoor household articles for the interstate movement of the articles if that person has inspected the outdoor household articles and has found them to be free of any life stage of GM. A signed statement must accompany the shipment stating the articles were inspected in accordance with the GM Program Manual. The mover must provide the originating State and the destination State with a copy.

Inspections of Outdoor Household Articles - Persons who desire to move interstate a regulated article which must be accompanied by a certificate or permit shall, at least 7 days before the desired movement, request an inspector to examine the article prior to movement. Persons who desire to move interstate an outdoor household article accompanied by a certificate issued in accordance with §301.45–9, shall, at least 14 days before the desired movement, request an inspector to examine the article prior to movement.

Assembly and inspection of regulated articles: issuance and cancellation of certificates - Any person, other than a person authorized to issue certificates under paragraph (c) of this section, who desires to move interstate a regulated article that must be accompanied by a certificate under §301.38–4(b), may request an inspector via phone or email to issue a certificate, shall, as far in advance of the desired interstate movement as possible (and no less than 48 hours before the desired interstate movement),

Assembly and inspection of regulated articles and outdoor household articles.

Persons who desire to move interstate a regulated article which must be accompanied by a certificate or permit shall, at least 7 days before the desired movement, request an inspector to examine the article prior to movement. Persons who desire to move interstate an outdoor household article accompanied by a certificate issued in accordance with §301.45–5 shall, at least 14 days before the desired movement, request an inspector via phone or email, to examine the article prior to movement.

Assembly and inspection of regulated articles - (a) Any person (other than a person authorized to issue certificates or limited permits under §301.50–5(c)), who desires to move a regulated article interstate accompanied by a certificate or limited permit must notify an inspector, at least 48 hours in advance of the desired interstate movement.

Conditions governing the interstate movement of regulated articles and outdoor household articles from generally infested areas - (iii) Is moved with a tag or label securely attached to the outside of the container containing the article or securely attached to the article itself if not in a container, and with such tag or label bearing a permit number corresponding to the number of the permit issued for such article.

<u>Attachment and disposition of certificates and permits</u> - a) If a certificate or permit is required for the interstate movement of regulated articles, the certificate or permit shall be securely attached to the outside of the container in which such articles are moved.

<u>Treatment Records</u> – Aircraft treatment records must be maintained by the applicator completing or supervising the treatment for a period of 2 years. These records must be provided upon request for review by an inspection. Treatment records shall include the pesticide used, the date of application, the location where the pesticide was applied (airport and aircraft), the amount of pesticide applied, and the name of the applicator.

<u>Notification of Unscheduled Flights</u> – Notification of unscheduled commercial flights and of all military flights must be given at least 1 hour before departure to the appropriate person in the destination airport of any of the States listed in the Japanese Beetle (JB) regulations (7 CFR 301.48(b).

<u>Certificates and limited permits</u> - (b) Attachment and disposition. (1) Except as provided in §301.75–6(b)(8) for kumquat plants, certificates and limited permits accompanying regulated articles interstate must be attached during the interstate movement to one of the following:(i) The outside of the regulated article, if the regulated article is not packed in a container, or(ii) The outside of the container in which the regulated article is packed.

<u>Protected areas written statement</u> -(e) Each State that is a protected area or that encompasses a protected area must submit annually to the Administrator a written statement, signed by an inspector, assuring APHIS that all nursery inspections have been performed in accordance with this section. The statement must be submitted by January 1st of each year, and must include a list of the nurseries inspected and found free of rust-susceptible plants.

Qualified Certified Applicator (QCA) Workshop Attendance- Qualified Certified Applicator who has attended and completed a workshop approved by the Administrator on the identification and treatment of GM life stages on outdoor household articles and mobile homes; and (3) who has entered into a compliance agreement in accordance with

§301.45–6 of this part for the purpose of inspecting, treating, and issuing certificates for the movement of outdoor household articles and mobile homes.

<u>Temporary Designation of Areas as Generally Infested Areas</u> - An inspector may temporarily designate any area in any State as a generally infested area. The inspector will give written notice of the designation to the owner or person in possession of the area. Thereafter, the interstate movement of any regulated articles from such areas will be restricted. The designation will be terminated by an authorized inspector, and notice will be given to the owner or person in possession of the areas.

Conditions governing the interstate movement of regulated articles and outdoor household articles from generally infested areas (Letter) - (iii) Is moved with a tag or label securely attached to the outside of the container containing the article or securely attached to the article itself if not in a container, and with such tag or label bearing a permit number corresponding to the number of the permit issued for such article.

<u>Other Forms or Documents</u> – During the conduct of regulatory activities for one or more of the domestic quarantines, special reports, documents, or forms are used. These documents or forms are:

Attachment and disposition of certificates, limited permits, and outdoor household article documents - (a) A certificate, limited permit, or OHA document required for the interstate movement of a regulated article or outdoor household article must at all times during such movement be securely attached to the outside of the container containing the regulated article or outdoor household article, securely attached to the article itself if not in a container, or securely attached to the consignee's copy of the waybill or other shipping document.

Documents Sent to State Plant Regulatory Official (OHA document) - Any qualified certified applicator who issues a certificate or outdoor household article document must, at the time of issuance, send a copy of the certificate or outdoor household article document to the State Plant Regulatory Official for both the originating State and the destination State.

Protected areas (Inspection time) -(e) Each State that is a protected area or that encompasses a protected area must submit annually to the Administrator a written statement, signed by an inspector, assuring APHIS that all nursery inspections have been performed in accordance with this section. The statement must be submitted by January 1st of each year, and must include a list of the nurseries inspected and found free of rust-susceptible plants.

Assembly and inspection of regulated articles and outdoor household articles. Persons who desire to move interstate a regulated article which must be accompanied by a certificate or permit shall, at least 7 days before the desired movement, request an inspector to examine the article prior to movement. Persons who desire to move interstate

an outdoor household article accompanied by a certificate issued in accordance with §301.45–5 shall, at least 14 days before the desired movement, request an inspector to examine the article prior to movement.

<u>Inspection and disposal of regulated articles and pests</u> -Any properly identified inspector is authorized to stop and inspect, and to seize, destroy, or otherwise dispose of or require disposal of regulated articles and JBs.

Assembly and inspection of regulated articles - (a) Any person (other than a person authorized to issue certificates or limited permits under §301.50–5(c)), who desires to move a regulated article interstate accompanied by a certificate or limited permit must notify an inspector, at least 48 hours in advance of the desired interstate movement.

<u>Interstate movement of regulated articles from quarantined areas (phone call)</u> -(a) Any regulated article may be moved interstate from a quarantined area into or through an area that is not quarantined only if moved under the following conditions: Criteria that laboratories must meet to become approved to process, test, or analyze soil, and the list of currently approved laboratories, may be obtained from the APHIS, PPQ.

<u>Cancellation of a certificate, limited permit, or compliance agreement</u> - Any certificate, limited permit, or compliance agreement may be cancelled, either orally or in writing, by an inspector when the inspector finds that the person who has entered into the compliance agreement has failed to comply with APHIS regulations. If the cancellation is oral, the cancellation and the reasons for the cancellation will be confirmed in writing as promptly as circumstances allow.

Imported fire ant detection, control, exclusion, and enforcement program - Any person whose issuance of certificates has been suspended may appeal the decision, in writing, within 10 days after receiving the written suspension notice. (1) The nursery owner must maintain records of the nursery's surveys and treatments for the IFA. These records must be made available to State and Federal inspectors upon request.

<u>Issuance and cancellation of certificates</u> - <u>Inspectors</u> (a) Movements from quarantined areas. (1) An inspector may issue a certificate for the interstate movement of regulated articles, associated articles, or non-host nursery stock from a quarantined area if the inspector determines cause.

Treatments: Reserved section for soil, greenery, debarking burden.

Attachment and disposition of certificates and recordkeeping. (c) All nurseries that are operating under compliance agreements must maintain records of all incoming shipments of plants for a minimum of 24 months and must make them available to inspectors upon request. In addition, all nurseries that are operating under compliance agreements, except retail dealers, must maintain records of outgoing shipments for a minimum of 24 months and must make them available to inspectors upon request.

<u>Compliance Agreement and Cancellation -Written Appeals</u> – Any person whose certificate or permit has been withdrawn may appeal the decision, in writing, to the Administrator within 10 days after receiving the written notification of the withdrawal. The appeal letter must state all of the facts and reasons concerning why the certificate or permit should not be withdrawn.

Black Stem Rust Report - Each State that is either protected from or encompasses a protected area for BSR must submit a signed annual written statement ensuring compliance with the regulations. This statement must be submitted by January 1st and must contain a listing of inspected nurseries.

<u>Other Requirements</u> - Shipments of regulated articles must have the following information marked on each container, waybill, manifest, or bill of lading:

Nature and quality of contents, name and address of shipper/owner/forwarder; name of consignee, shipper's identifying mark and number; and the serial number of the certificate or limited permit authorizing movement. In addition, each of the smallest units being transmitted into or through the continental United States must be conspicuously marked prior to the sealing of the container.

For example, JB, inspectors will notify the airport and each airline official, in writing, upon the designation of an airport as regulated for JB. The inspector will also notify these same officials upon the termination of the designation.

In addition to the airline industry, the following States will receive notification if regulated articles are being moved there: Arizona, California, Idaho, Nevada, Oregon, Utah, and Washington.

These documents are reviewed by Federal, State, and sometimes County regulatory officials. The information is used to determine areas of risk so that trapping and other types of pest surveys can be planned and conducted. These surveys provide information on the effectiveness of quarantines and provide an early notice when the quarantine pest becomes established in a previously noninfested area.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

PPQ Form 527 (Certificate) and PPQ Form 537 (Limited Permit Sticker) is pressure sensitive and is not practicable for automation.

PPQ Form 537 (Limited Permit Sticker) is pressure sensitive and is not practicable for automation.

PPQ Form 540 (Certificate of Federal/State Domestic Quarantine) These forms are accountable forms that must be issued by a PPQ employee, or a person under Compliance Agreement with PPQ. Strict control is needed for the issuance of these forms, as they allow the movement of regulated products that are subject to restrictions, and they can only be issued after an inspection proves that the shipment meets the requirements for movement. Movement may also require a treatment, which has to be determined by an inspector. The form must accompany the shipment throughout transport from the inspection until destination.

PPQ Form 530 (Limited Permit) These forms are accountable forms that must be issued by a PPQ employee, or a person under Compliance Agreement with PPQ. Strict control is needed for the issuance of these forms, as they allow the movement of regulated products that are subject to restrictions, and they can only be issued after an inspection proves that the shipment meets the requirements for movement. Movement may also require a treatment, which has to be determined by an inspector. The form must accompany the shipment throughout transport from the inspection until destination.

PPQ Form 543 (BSR Inspector's Report) – Due to low usage of this form, it is not practicable for automation at this time. If the agency does decide in the future to have this form automated, it will be in collaboration with the Canadian Government.

PPQ Form 519 (Compliance Agreement) is automated and posted at www.aphis.usda.gov/library/forms/pdf/ppq519.pdf . This form can be printed and manually completed.

PPQ Form 523 (Emergency Notification Action) is automated and posted at: www.aphis.usda.gov/library/forms

PPQ Form 518 (Report of Violation) was previously automated as a lotus notes document, but not at the present time. PPQ Form 518 will be added to IES violation database in the future, but there is no timeframe for this to be done.

A statement written by a person requesting movement of a regulated article or outdoor household article can be generated on a computer and printed for signature if the respondent has access to one.

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.

APHIS is the only federal agency responsible for preventing the incursion or interstate spread of plant pests, diseases, and noxious weeds. The information APHIS is collecting

is its only source for the information and is not being collected through other forms or reports.

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 minimum needed to protect growers nationwide from the interstate spread of plant pests and diseases. APHIS has determined that 90% of the total respondents are small entities.

6. Describe the consequences 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 APHIS did not collect this information or collected it less frequently, the effectiveness of APHIS' domestic quarantine program would be severely compromised, likely resulting in the interstate spread of a number of destructive (and economically damaging) agricultural pests. The spread of such pests as the JB or GM would result in millions of dollars in damage to American agriculture.

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.

This information collection is conducted in a manner consistent with the guidelines established 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;

Notification of unscheduled commercial flights and of all military flights must be given at least 1 hour before departure to the appropriate person in the destination airport of any of the States listed in the JB regulations (7 CFR 301.48(b).

Any person whose certificate or permit has been withdrawn may appeal the decision, in writing, to the Administrator within 10 days after receiving the written notification of the withdrawal. The appeal letter must state all of the facts and reasons concerning why the certificate or permit should not be withdrawn.

Persons who desire to move interstate a regulated article which must be accompanied by a certificate or permit shall, at least 7 days before the desired movement, request an inspector to examine the article prior to movement. Persons who desire to move interstate

an outdoor household article accompanied by a certificate issued in accordance with §301.45–5 shall, at least 14 days before the desired movement, request an inspector to examine the article prior to movement.

Any person whose certificate, limited permit, or compliance agreement has been canceled may appeal the decision, in writing, within 10 days after receiving the written cancellation notice.

- 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.

There are no other special circumstances associated with this information collection.

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.

On Friday, May 1, 2015, pages 24892-24893, 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.

The following individuals were consulted:

Josh Kress

California Dept. of Food & Agriculture Plant Health & Pest Prevention Services Permits and Regulations Program 1220 N. Street, Rm. 210 Sacramento, CA 95815 (916) 403-6667

Joseph Albano
American Nursery & Landscape Association
Research Program Director
1250 I Street SW, Suite 300
Washington, DC 20005
(202) 789 0683

Alana Wiley Florida Citrus Packers Association 302 S Mass Avenue # 203 Lakeland, FL 33801-5091

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 stature, regulation, or agency policy.

No additional assurance of confidentiality 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 and attitudes, religious beliefs, and others that are 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 asks no questions of 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 for hour burden estimates.

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

512,491 X 33.15 = \$16,989,076

\$33.15 is based on the average salaries of businesses, state and farmers derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2014 Report: Occupational Wages in the United States. http://www.bls.gov/news.release/pdf/ocwage.pdf

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.

There is zero annual cost burden associated with capital and start-up, operation and maintenance, and purchase of services in connection with this program.

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 estimated cost to the Federal Government is \$ 7,096,243. (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 an increase of 669 responses and 344 burden hours. The reasons for the increases are that the number of responses and burden hours for the "Attachment and disposition of certificates and recordkeeping" was omitted in the prior ICR submission. This accounts for 650 responses and 325 burden hours, and the remaining 19 responses and burden hours were due to adding 1 as a place holder for activities that were previously showing a 0 in the last submission.

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

APHIS has no plans to tabulate or publish the information APHIS collects.

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.

PPQ 540 is used in 6 collections, PPQ 519 is used in 12 collections and PPQ 530 is used in 7 collections, therefore, it is not practical to include an OMB expiration date because of the various expiration dates for each collection. APHIS is seeking approval to not display the OMB expiration date on these forms.

On PPQ Forms 527, 537, 543, 523, and 518, APHIS has no plans to seek approval for not displaying the OMB expiration date on its forms.

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

APHIS certifies compliance with all the provisions under the Act.

B. Collections of Information Employing Statistical Methods. Statistical methods are not used in this information collection.