Supporting Statement – Part A

**BEE and HONEY SURVEY**

OMB No. 0535-0153

**A. JUSTIFICATION**

This is a request for the renewal and expansion of a currently approved data collection. The National Agricultural Statistics Service (NASS) would like to expand the currently approved survey that is sent to beekeepers who have five or more honey bee colonies to also include a sampling of beekeepers with less than five colonies. In addition NASS plans to add some basic economic questions on to both questionnaires (large and small producers). These proposed changes are in response to a Presidential Initiative and to fulfill the requests of data users.

**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 National Agricultural Statistics Service's primary function is to prepare and issue State and national estimates of crop and livestock production, value, and disposition. As part of this function, estimates are made for honey production, stocks, and prices.

Domestic honey bees are critical to the pollination of U.S. crops, especially fruits, some nuts, vegetables, and some specialty crops. The survival of bees is threatened by parasites, diseases, and other factors. In many areas, the wild European honey bee population is virtually nonexistent. Federal, State and local governments provide programs to assist in the survival of honey bees and to encourage beekeepers to maintain honey bee colonies. Honey production and price data are used by the government to administer these programs.

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 collection 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.**

NASS estimates are used by producers and the agribusiness sector of the honey industry to make production and marketing decisions. The Bee and Honey survey is conducted in all States. The NASS Bee and Honey surveys collect data on the number of colonies each operation has, the amount of honey produced and the amount of honey stocks available for sale. Honey is marketed by three primary color classes (1. water white, extra white and white; 2. extra light amber; and 3. light amber, amber and dark amber). Honey can take on unique flavor characteristics if it is produced in or around certain crops such as buckwheat. Production and marketing data for all of these different classes are used by data users.

The Agricultural Research Service (ARS), State-level Apiarists and Agricultural Colleges throughout the U.S. need NASS honey data to administer their honey bee research programs. ARS has four honey bee research centers. Research projects include colony collapse disorder, parasites, Africanized honey bees, foul brood disease, and food safety and inspection.

The Agricultural Marketing Service (AMS) uses NASS honey production data as source data. The Honey Packers and Importers Research, Promotion, Consumer Education, and Industry Information Order (Order) [7 CFR Part 1212] is authorized by the Commodity Promotion, Research, and Information Act of 1996 (1996 Act) [7 U.S.C. 7411-7425]. Under the Order, assessments are collected on honey and honey products packed or imported into the 50 states, Puerto Rico, and the District of Columbia. The funds collected are used by the Board for research and development, advertising and promotion of honey and honey products, consumer education, and industry information, under AMS supervision. The Board administers the program and reimburses the Federal government for the costs incurred in implementing and administering the program.

The Economic Research Service (ERS) needs NASS honey data to construct U.S. and per capita caloric sweetener consumption. The data are used in the Sugar and Sweeteners Yearbook tables provided by ERS. The data are also utilized in the *Situation and Outlook Report* and the *Food Consumption* series, which are mandated by Congress.

The Farm Service Agency (FSA) uses NASS honey production data as source data. The Farm Security and Rural Investment Act of 2002 (2002 Act) provides that the Farm Service Agency (FSA) administer the nonrecourse marketing assistance loan and loan deficiency payment (LDP) program for honey. The honey nonrecourse marketing assistance loan and LDP program provides eligible honey producers with two forms of federal assistance. The program helps to stabilize America's honey industry and ensure the wellbeing of agriculture in the United States. Nonrecourse marketing assistance loans are administered by FSA, on behalf of the Commodity Credit Corporation (CCC). The Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) authorized the Emergency Assistance for Livestock, Honey Bees, and Farm-Raised Fish Program (ELAP). ELAP assistance covers some species, loss conditions, and losses that are not eligible for other disaster assistance programs, including colony collapse disorder.

The Risk Management Agency (RMA) is now offering a pilot insurance program for apiculture. This pilot program will use a 5-year rolling average of USDA National Agricultural Statistics Service (NASS) data of yield based on the NASS State average, and the price is the national average honey price for a given year. This new pilot program uses rainfall and vegetation greenness indices to estimate local rainfall and plant health, allowing beekeepers to purchase insurance protection against production risks.

In January 2015, NASS will include some basic economic questions related to honey bee production. In order to get a true picture of the total costs incurred by beekeepers NASS will also survey beekeepers with less than five colonies. In the past NASS has focused on only the operations with five or more colonies. These new economic questions and expansion of the sample are in response to a cooperative agreements between NASS, Economic Research Service (ERS) and the National Institute of Food and Agriculture (NIFA).

**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 for this survey was approved and conducted for the first time starting December 2003. A questionnaire repository system (QRS) was built which enables simultaneous creation of comparable paper and web survey instruments for these surveys. In 2014, 6.9% of the operations surveyed, completed the questionnaire by use of the internet.

**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. These surveys meet both State and federal needs, thus eliminating duplication and minimizing reporting burden on the agriculture industry. Data collected on this survey are not available from any other source.

NASS will coordinate the Colony Loss Surveys (OMB# 0535-0255) with the annual Bee and Honey surveys included in this submission. Both samples (operations with five or more colonies and operations with less than five colonies) has been coordinated, so that the respondents receive only one mailing from NASS. This is being done to reduce any possible confusion on the respondents and to minimize data collection costs.

**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 on the Bee and Honey questionnaire can be provided with a minimum of difficulty by respondents, generally without having to consult their record books. Out of the estimated sample size of 31,500 operations, approximately 90 percent of them would be 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.**

Bee and honey data are collected only once a year. Collecting data less frequently would eliminate data needed to keep the industry abreast of changes at the State and national level and diminish their ability to recognize the changing trends in the Honey industry. Timing of the report has evolved to meet the needs of customers and yet minimize the burden on the reporting public.

Furthermore, data relating to the number and location of commercial apiaries is vital to fruit, vegetable and many specialty crop farmers. An ample supply of honey bees is crucial to the pollination of these crops. Many of the larger apiaries are contracted to transport their hives to regions producing fruits, vegetables, and specialty crops at the appropriate season(s) to ensure proper pollination of these crops.

**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 information collection.

**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 August 24, 2015 on pages 51196 - 51197. There was one public comment from Ms. Jean Public, which is attached with this document.

**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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Meetings or telephone calls for consultation were made with the following: Agricultural Research Service, Dr. Jeff Pettis, Bee Research Leader; State Apiarists; Agricultural Marketing Service; Farm Services Agency; National Honey Board; National Institute of Food and Agriculture, Economic Research Service; Foreign Agriculture Service; Sioux Honey Association, Sioux City, Iowa; Troy Fore, Jr., Executive Director of the American Beekeeping Federation, Inc., Jessup, Georgia; and Dennis vanEnglesdorf, Research Scientist, Department of Entomology at the University of Maryland. These people provide input on trade practices, program changes, and list building. The American Beekeeping Federation newsletter includes an article in support of the survey each year before questionnaires are mailed.

**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 kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of 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 these 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.

The following CIPSEA Pledge statement appears on all NASS questionnaires.

The information you provide will be used for statistical purposes only. In accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public Law 107–347, and other applicable Federal laws, your responses will be kept confidential and will not be disclosed in identifiable form to anyone other than employees or agents. By law, every employee and agent has taken an oath and is subject to a jail term, a fine, or both if he or she willfully discloses ANY identifiable information about you or your operation.

All individuals who may access these confidential data for research are also covered under Titles 18 and CIPSEA and must complete a Certification and Restrictions on Use of Unpublished Data (ADM-043) agreement.

**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.**

The following table contains the annual estimated burden hours and responses for the surveys included in this approval request. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 8,937 hours is multiplied by $25 per hour for a total annual cost to the public of $223,425.

NASS regularly checks the Bureau of Labor Statistics’ [Occupational Employment Statistics](http://www.bls.gov/oes/tables.htm). Mean wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May 2014 mean wage for bookkeepers is $18.30. The mean wage for farm managers is $34.89. The mean wage for farm supervisors is $22.86. The mean wage of the three is $25.35.

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the average times for each of the questionnaires used.

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**13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 total cost to the federal government for the annual Bee and Honey Survey is approximately $422,000. About $370,000 is for federal salaries, $30,000 for telephone and field enumeration by associated State employees (of the National Association of State Departments of Agriculture), and $22,000 for printing, postage, data processing, etc.

**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).**

In the current submission we are requesting a total of 51,660 responses and 8,937 hours of burden. The program changes and adjustments are displayed in the table below.



**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 mailed about December 22nd. Operations that do not respond by mail or internet within five weeks will be attempted by phone or personal enumeration. Data collection is completed by early February to reflect December 15 honey stocks. Summarization and preparation of estimates by NASS Field Offices (FOs) are completed by late February and sent to Headquarters. Headquarters acts as the clearing house for multi-State data from FOs. Survey estimates are based primarily on a direct expansion indication. Summarization also includes matching the current year's report to the comparable report received the previous year to calculate a ratio, which is applied to the previous year’s estimate of colony numbers to provide an indication of the current number of colonies.

The “Honey” report is published from Headquarters in mid-March.

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1191>

Price data are published by color class at the U.S. level and yield, production, and value data are published on an all honey basis at the State and U.S. level. Some State estimates may be combined to avoid disclosing data for individual operations.

**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.

October 2015