

May 12, 2017

**SUPPORTING STATEMENT**  
**IMPORTATION OF HORSES, RUMINANTS, SWINE, AND DOGS;**  
**INSPECTION AND TREATMENT FOR SCREWORM**  
**OMB NO. 0579-0165**

**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, of 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 91 through 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, and 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. Screwworm was also detected in 1997, 2007, and 2010 in dogs imported into the United States from Panama, Trinidad and Tobago, and Venezuela.

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 with a health certificate stating that the above actions were taken. APHIS requires four documents to import horses, ruminants, swine, and dogs from regions where screwworm is known to exist: an application for import or in-transit permit (VS 17-129); a health certificate signed by a Federal veterinarian of the exporting country; a declaration of importation with the importer, broker, and final destination information (VS 17-29); and a quarantine reservation.

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 (VS Form 17-129); (9 CFR 93.301(j), 9 CFR 93.304) (Business)** - Anyone wishing to import ruminants or swine into the United States must apply for a permit via the completion and submission of a VS Form 17-129, Application for Import or In-Transit Permit. 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 form is not required for the importation of dogs. The importer must describe the type, number, and identification of the animals or products to be imported. It must also list the country of 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.

APHIS also uses the information in the permit application to issue to the importer a VS Form 17-135, U.S. Permit to Import, which includes statements of import requirements with which the importer must comply to import the animals specified. APHIS completes VS Form 17-135 to eliminate burden on the public. The issued permit is valid for 14 days for horses, ruminants, and swine.

**Request for Health Certificate; (9 CFR 93.301 (j), 9 CFR 93.404(a), 9 CFR 93.505(a), 9 CFR 93.600(a)(1)) (Foreign Government) (Business)** - Importers are responsible for requesting health certificates from foreign veterinary government officials for the animals to be imported to the United States.

**Health Certificates; (9 CFR 93.301 (j), 9 CFR 93.404(a), 9 CFR 93.505(a), 9 CFR 93.600(a)(1)) (Foreign Government)** - Horses, ruminants, swine, and dogs entering the United States from regions where screwworm is known to exist must be accompanied with a health certificate completed, signed, and issued 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 within 5 days of exportation. APHIS inspectors review the health certificates to ensure imported animals are in compliance with U.S. regulations. APHIS does not require the importer to maintain records of this form. For imported dogs that will be used for handling livestock, the health certificates must also state the dogs were tested and, if necessary, treated for cestodes within 5 days of exportation to the United States. The health certificates help APHIS safeguard U.S. livestock against screwworm infestation.

**Declaration of Importation (VS 17-29); (9 CFR 93.301, 9 CFR 93.405, 9 CFR 93.505) (Business)** - Importers must prepare VS Form 17-29, Declaration of Importation, to declare the animals they are bringing into the United States. Collected by (or provided from APHIS to) U.S. Customs officials, the declarations of importation contain information on the port of entry; name and address of the importer; name and address of the broker; number, breed, species, and purpose of import; and the name and location of the animals' recipient. The form alerts APHIS that certain animals will be entering the United States and assists APHIS in preventing the entry of foreign animal diseases.

**Quarantine Reservation, (9 CFR 93.301, 9 CFR 93.411, 9 CFR 93.504) (Business)** - Brokers or importers are responsible for contacting APHIS-approved quarantine facilities to reserve quarantine space for horses, ruminants and swine imported into the United States. Reservations may be requested by mail, email, or fax to the facility, and the requests must include the date and time of arrival, number and species of animals, and form of payment for quarantine services. APHIS works closely with the quarantine facilities to monitor the availability and use of quarantine space for imported animals.

**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 Forms 17-29 and 17-129 are available in fillable PDF format from the USDA APHIS forms website at [https://www.aphis.usda.gov/aphis/resources/forms/ct\\_vs\\_forms](https://www.aphis.usda.gov/aphis/resources/forms/ct_vs_forms). Completed forms can then be submitted by fax, mail, or email, or resaved in PDF and uploaded into the U.S. Customs and Border Protection's (CBPs) Automated Commercial Environment (ACE) Secure Data Portal. APHIS is involved with the Government-wide utilization of the International Trade Data System (ITDS) via ACE to improve business operations and further Agency missions. This will allow respondents to submit the data required by CBP and its Partner Government Agencies (PGAs), such as APHIS, through a Single Window concept. APHIS is also establishing a system known as e-File for CARPOL (Certification, Accreditation, Registration, Permitting, and Other Licensing) activities. This new system will strive to automate some of these information collection activities. The system is still being developed and business processes continue to be identified and mapped.

The VS Form 17-29 also can be processed via the VS Process Streamlining (VSPS) data entry system (<https://vsapps.aphis.usda.gov/vsps/public/Login.do>). The VS Form 17-129 also can be processed via APHIS ePermits at [http://www.aphis.usdu.gov/permits/login\\_epermits.shtml](http://www.aphis.usdu.gov/permits/login_epermits.shtml).

Foreign health certificates require original signatures and official stamps or seals and thus are not candidates for electronic submission at this time.

Quarantine reservation requests may be submitted in writing via mail, email, or fax to the APHIS-approved quarantine facility.

**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 animals imported from certain regions pose a negligible risk of introducing screwworm into the United States. APHIS is the only U.S. agency responsible for preventing the introduction of exotic animal diseases and parasites into the United States; the information is not available from any other source.

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

APHIS has determined that approximately 98 percent of the business respondents to this information collection are small businesses. The burden outlined in Question 2 above are the absolute minimum processes for gathering the information required by USDA. Importers are responsible for completing the forms or requests as they are the only entities with access to the information required to complete them.

**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 not be able to ensure horses, ruminants, swine, and dogs imported into the United States are not infested with screwworm. Less frequent information collections would allow a screwworm incursion to be much more likely, severely damaging the U.S. equine, cattle, and swine industries who would be financially burdened by the consequential loss of 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.**

APHIS engaged in productive consultations with the following individuals in connection with the importation of animals and their inspection and treatment for screwworm:

Selwyn Wallace  
IRT USA  
1525 Kautz Road, Suite 1600  
West Chicago, IL 60185  
310-306-0262

Louis J. Marino  
Alex Nichols Agency  
3800 Hampton Rd  
Oceanside, NY 11572  
516-678-9100

Chris Santarelli Mersant Intl. Ltd.  
Worldwide Horse Transporters  
158-12 Rockaway Blvd.  
Jamaica, NY 11434  
347-632-3004

On Monday, January 23, 2017, APHIS published in the Federal Register on pages 7791 and 7792 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.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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. 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 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 asks 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.**

See APHIS Form 71.

- **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 \$26,951.93. Respondents are full-time salaried veterinary officers of the exporting regions and animal importers. APHIS arrived at this figure by multiplying the total burden hours (827) by the estimated average hourly wage of the respondents (\$32.59).

The average hourly wage for respondents show above (\$32.59) was determined by taking the average of hourly rates for foreign veterinary officers (\$41.71) (<http://www.salaryexpert.com>), and importers (\$23.47) ([http://www.bls.gov/oes/current/oes\\_stru.htm](http://www.bls.gov/oes/current/oes_stru.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. There are user fees associated with import permit applications, quarantines, and inspections.

**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.**

See APHIS Form 79. The estimated annualized cost to the Federal Government is \$322,443.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

|                            | 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 | 5,359     | 0                                 | 3,422                                   | 0   | 0  | 1,937               |
| Annual Time Burden (Hr)    | 827       | 0                                 | 342                                     | 0   | 0  | 485                 |

In this renewal, respondents stayed the same at 92, annual responses increased from 1,937 to 5,359, and total burden hours increased from 485 to 827.

As indicated in the table above, a total of 3,422 additional responses were due to discretionary program changes, mainly the addition of three new burdens as the program refined its identification of burden during the review. These same changes also resulted in 342 additional burden hours. The three new burdens are the importers' requests for health certificates; submission of the VS Form 17-29; and a requirement to schedule quarantine reservations. These were not captured previously. Specific details for these burdens are shown below:

**RESPONSES**

| <u>REGS</u>  | <u>REASON</u>                  | <u>PREVIOUS BURDEN</u> | <u>NEW BURDEN</u> | <u>DIFFERENCE</u> | <u>TYPE OF CHANGE</u> |
|--------------|--------------------------------|------------------------|-------------------|-------------------|-----------------------|
| 93.301 et al | Request for Health Certificate | 0                      | 1,702             | 1,702             | PROG                  |
| 93.301 et al | VS 17-29                       | 0                      | 70                | 70                | PROG                  |
| 93.301 et al | Quarantine Reservation         | 0                      | 1,650             | 1,650             | PROG                  |
|              |                                | 0                      | 3,422             | 3,422             |                       |

**HOURS**

| <u>REGS</u>  | <u>REASON</u>                  | <u>PREVIOUS BURDEN</u> | <u>NEW BURDEN</u> | <u>DIFFERENCE</u> | <u>TYPE OF CHANGE</u> |
|--------------|--------------------------------|------------------------|-------------------|-------------------|-----------------------|
| 93.301 et al | Request for Health Certificate | 0                      | 170               | 170               | PROG                  |
| 93.301 et al | VS 17-29                       | 0                      | 7                 | 7                 | PROG                  |
| 93.301 et al | Quarantine Reservation         | 0                      | 165               | 165               | PROG                  |
|              |                                | 0                      | 342               | 342               |                       |

**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 collected 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.**

APHIS is seeking approval not to display the expiration date on VS Forms 17-29 and 17-129. Both forms are used in multiple OMB-approved information collections and therefore it is not practical to include an OMB expiration date because of various expiration dates for each collection.

**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.