

**2017 SUPPORTING STATEMENT**  
**Specified Commodities Imported into the United States**  
**Exempt from Import Regulations**  
**OMB No. 0581-0167**

**NOTE TO REVIEWER:** In the last revision the forms were noted FV. In the interim, the program name changed from Fruit and Vegetable Program (FV) to Specialty Crops Program (SC). As such, the names of the forms have changed from FV to SC.

**A. JUSTIFICATION**

**1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.**

Section 608e of the Agricultural Marketing Agreement Act of 1937, as amended (7 U.S.C. §§ 601-674; Act), requires that whenever the Secretary of Agriculture issues grade, size, quality, or maturity regulations under domestic Federal marketing orders, the same or comparable regulations must be used for imported commodities.

Import regulations apply only during periods when the domestic marketing order regulations are in effect. Domestic marketing orders currently in effect impact the following imported commodities: avocados; dates (other than dates for processing); hazelnuts (filberts); grapefruit; table grapes; kiwifruit; olives (other than Spanish-style green olives); onions; oranges; Irish potatoes; pistachios; raisins; tomatoes; and walnuts. These domestic and imported products are exempt from meeting established grade, size, quality, and maturity requirements if they are to be used only for authorized exempt purposes, such as processing, charity, or animal feed.

Importers seeking exemption from inspection on imported commodities may file form SC-6, which the Agricultural Marketing Service (AMS) uses to verify compliance with the following import regulations: (1) fruits; import regulations (7 CFR 944.350); (2) vegetables; import regulations (7 CFR 980.501); and (3) specialty crops; import regulations (7 CFR 999.500).

**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.**

Reporting requirements ensure that exempt products are used only for authorized purposes. Information about the collection is available on the Marketing Order and Agreement Division (MOAD) website (<https://www.ams.usda.gov/rules-regulations/moa>) as part of their oversight role. Because of the ease with which imported products can enter domestic fresh market channels, the following importer and receiver reporting requirements are in place to prevent exempt imported products from doing so:

**Importer's Exempt Commodity Form: SC-6 (§§ 944.350, 980.501, 999.1, 999.100, 999.200, 999.300, and 999.400):** Importers wishing to import commodities for exempt purposes must complete the SC-6. A SC-6 certificate allows importers to receive an exemption from satisfying the Section 8e inspection requirement by providing assurance that the shipment will be sent to processing, animal feed, charity relief, certified seed, government agencies, or other exempt outlets (requirements vary according to commodity). Both the shipper and receiver are required to register in the Compliance and Enforcement Management System (CEMS) to electronically file an SC-6 certificate to notify MOAD of the exemption activity. In the last renewal, AMS used a system called MOLS. MOLS has since been eliminated and replaced with CEMS. The data are simultaneously transmitted to the receiver, who verifies receipt of the commodity, and to AMS, where it is reviewed for compliance purposes by MOAD. The receiver e-signs a copy to certify receipt of the shipment and intent to dispose of the shipment in the exempt outlet specified.

In rare instances a paper form SC-6 may be used. The form has four parts, which are distributed as follows: one copy is presented to the U.S. Customs and Border Protection, Department of Homeland Security; one copy is filed with MOAD within two days of the commodity entering the United States; one copy accompanies the exempt shipment to its intended destination, where the receiver certifies its receipt and that it will be used for exempt purposes, and then files that copy with MOAD; and one copy is retained by the importer.

In both the electronic and paper versions of the SC-6, the information collected includes information on the imported product (type of product and lot identification), the importer's contact information, the U.S. Customs entry number, inspection date, and intended use (processing, charity, livestock/animal feed).

**Civil Penalty Stipulation Agreement: SC-7 (§ 900.82):** In a situation where a party is alleged to have violated the importation regulations, AMS can use this form to settle the matter in exchange for the payment of a fine. This gives AMS a tool to resolve certain cases without bearing the costs of a hearing. There is no burden associated with this form as only a signature is required. Title 7, United States Code, Section 601-674 of the Agricultural Marketing Agreement Act of 1937, authorizes the Secretary of Agriculture to assess a civil penalty of not more than \$1,100 per violation against any person who violates the Section 8e regulations. Investigators complete the form identifying the violation committed by the produce importer. Produce importers sign the SC-7 form to agree to pay the sum in full settlement.

**Training/Instruction Provided:** MOAD provides information on its website about the commodities imported under section 8e of the Act and directions to the CEMS portal. Every year, MOAD interacts with approximately a third of importers or 26 individuals to provide information on section 8e requirements. For interested importers who are unable to attend in person, MOAD provides the presentation in a webinar on its website. The webinar is approximately 30 minutes in length.

SC-6 Electronic (Screen shot): Electronic copy of the SC-6 form which importers view on CEMS. (CEMS portal is <https://cems.ams.usda.gov>.) (Burden accounted for in all entries.)

**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.**

AMS uses CEMS to collect information electronically from importers and receivers, sufficient for form SC-6. Paper forms are used if respondents have a unique situation that might preclude using CEMS. The use of this electronic format has reduced the burden on the public since it is faster and more user-friendly. (CEMS portal is <https://cems.ams.usda.gov>.)

Form SC-7, the Civil Penalty Stipulation Agreement is available only as a paper form since it requires signatures from multiple parties, and is equivalent to a settlement agreement in cases where AMS might otherwise take legal action against a party who has violated import regulations.

**4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.**

To provide consistency and ease the reporting burden on importers who import several types of regulated products, a standardized reporting method has been established through CEMS, which populates form SC-6 and generates import certificates. CEMS can be used for all imported fresh fruit, vegetable, and specialty crop products under the import regulations. Form SC-6 is periodically reviewed to avoid unnecessary information collection and duplication by industry and public sector agencies. At the present time, there are no duplications between Federal agencies as MOAD collects and cooperates with various agencies, such as the U.S. Customs and AMS's Specialty Crop Inspection Division.

Form SC-7 is also used across all commodities where a party is charged with violating the import regulations. If AMS can reach an agreement with the violating party, the importer will pay a fine in exchange for the case being settled. MOAD works closely with U.S. Customs and the Specialty Crop Inspection Division to ensure there is no duplication of information collection.

**5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.**

Of the approximately 79 respondents addressed in this information collection, approximately 80 percent can be classified as small entities. Form SC-6 requires only a minimal amount of information to be submitted through CEMS. The submission does not require data processing equipment or a trained statistical staff. The primary sources of data used to complete SC-6 are routinely used in import transactions. Thus, the information collection and reporting burden is relatively small. The same reporting requirements are required of all importers and receivers, so any importer or receiver that is smaller than the industry average is not significantly disadvantaged.

**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.**

This information collection was initially developed, and has since been streamlined through an internet-based application, to guarantee compliance with the import regulations addressed above. Reports required in this information collection are similar to the reporting requirements of most domestic marketing orders. The timing and frequency of collecting this information varies in accordance with import shipments.

If this information collection were not conducted, USDA would have no way of maintaining a safe and legal import program for fruits, vegetables, and specialty crops, as this is the only method of securing compliance with section 8e of the Act.

**7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:**

- **REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;**

Shipment of fruits, vegetables, or specialty crops being imported into the United States for exempt use must be accompanied by a SC-6 certificate. The certificate is received by inputting specific data into CEMS. Such shipments can occur on a daily basis. Importers complete this form as often as necessary.

- **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;**

In rare instances a paper form SC-6 may be used. Under these conditions, SC-6 paper copy must be sent to MOAD within one to two days of receiving the shipment to receive approval for exempt status on the shipment. The form has four parts, which are distributed as follows: one copy is presented to the U.S. Customs and

Border Protection, Department of Homeland Security; one copy is filed with MOAD within two days of the commodity entering the United States; one copy accompanies the exempt shipment to its intended destination, where the receiver certifies its receipt and that it will be used for exempt purposes, and then files that copy with MOAD; and one copy is retained by the importer.

- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 8. IF APPLICABLE, 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. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**

A 60-day notice was published in the Federal Register on March 31, 2017 (Vol. 82, No. 61, Page 16019-16020), inviting comments from interested persons through May 30, 2017. No comments were received.

- **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 FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.**
- **CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS – EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.**

MOAD is available by phone and email to address any inquiry from the applicants. Given the training available and simplicity of the form, MOAD does not typically interact with the majority of submissions. If the form is submitted properly, MOAD would not need to contact the applicant.

**9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.**

Respondents are not provided with gifts or payments for providing information.

**10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.**

Section 608(d) of the Act provides that information acquired will be kept confidential. Information submitted to AMS is accessible only by certain USDA employees in Washington, D.C., and are stored in a secure environment.

**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. 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.**

Questions of a sensitive nature are not included on any form in this information

collection.

**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. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE.**

The number of respondents electing to file forms is approximately 79 importers and receivers. See AMS-71 spreadsheet for breakout.

- **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 AMS-71 spreadsheet for breakout.

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES.**

The respondents' estimated annual cost of reporting information to USDA is approximately \$17,395.14. This total has been estimated by multiplying 581 total burden hours by \$29.94, the national mean hourly wage of Buyers and Purchasing Agents of Farm Products, according to the U.S. Department of Labor Statistics. (National Compensation Survey: Occupational Employment and Wages, May 2016; <https://www.bls.gov/oes/current/oes131021.htm>).

**13. PROVIDE AN ESTIMATE 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 ESTIMATE 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. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.**
- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

There are no start-up or maintenance costs to respondents or record keepers that are not included in items 2 and 14.

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**



The Federal government’s annual costs for providing oversight of, and assistance for, this information collection, are estimated at \$60,000. A breakdown of the oversight costs for the first year is as follows:

Salaries/benefits/awards	\$47,000
Database maintenance	\$10,000
Federal Register Services	\$3,000
<b>TOTAL</b>	<b>\$60,000</b>

**15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.**

Based on the information collected on the frequency of use for the forms, AMS has revised estimates of respondents and responses. In 2017, the burden is estimated at 581 hours with 6,893 annual responses. In 2014, the burden was estimated at 17,734 hours with 213,691 annual responses. The sizable difference is because the 2014 renewal burden numbers were compiled based on the highest number of respondents and responses per respondent for all three years added together, instead of averages per year. The 2017 estimates of respondents and responses are calculated by taking the raw annual data collected from inspections on Section 8e crops entering the U.S. market and finding the three-year averages. These numbers represent an approximation of the annual burden given the frequent changes in number of respondents and responses from year to year.

<b>Regulation</b>	<b>Reason</b>	<b>Previous Burden</b>	<b>New Burden</b>	<b>Difference</b>	<b>Type</b>
944.350	<b>Avocados</b> Inc. in respondents; dec. in responses per respondents	1.33	1.00	-0.33	ADJ
944.350	<b>Grapefruit</b> Dec. in responses per respondents	1.66	.83	-.83	ADJ
944.350	<b>Kiwifruit</b> Inc. in respondents	0	.33	.33	ADJ
944.350	<b>Olives</b> Inc. in respondents; inc. in responses per respondent	.08	.50	.42	ADJ
944.350	<b>Oranges</b> Dec. in respondents; dec. in responses per respondent	359.31	75.03	-284.28	ADJ
980.501	<b>Onions</b>	201.03	22.66	-178.37	ADJ

	Dec. in respondents dec. in responses per respondent				
980.501	<b>Potatoes</b> Dec. in respondents; dec. in responses per respondent	17,156.10	463.14	-16,692.96	ADJ
999.1	<b>Dates</b> Inc. in respondents; dec. in responses per respondent	14.77	4.32	-10.45	ADJ
999.1	<b>Walnuts</b> Inc. in respondents	0	0.8	0.08	ADJ
N.A.	Importers training for CEMS and 8e	0	13	13	PC
	<b>TOTAL</b>			<b>-17,153.39</b>	

**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.**

There are no plans to publish any information or data collections.

**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.**

AMS requests approval not to display the expiration date on the forms associated with this information collection because having to do so would prevent the use of CEMS and its self-generated forms.

Since CEMS is an internet-based application where importers and receivers enter data and receive SC-6 certificates, requiring an expiration date on the SC-6 would make it very difficult and expensive to update CEMS. Users enter data in CEMS, which then automatically generates the form based on the data that was input. USDA rarely uses paper forms, except for instances when importers cannot access CEMS to receive the SC-6 electronically.

Form SC-7 is equivalent to a legal settlement, and is used only when import violations occur. Requiring an expiration date on that form would increase potential errors, and could result in legal settlements being invalidated if an old form were accidentally used.

**18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, “CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS,” OF OMB FORM 83-1.**

The agency is able to certify compliance with all provisions under item 19 of OMB form 83-1.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection of information does not employ statistical methods.