Supporting Statement – Part A

 **BEE and HONEY SURVEY**

 OMB No. 0535-0153

**A. JUSTIFICATION**

This is a request for the renewal and change of a currently approved data collection. The National Agricultural Statistics Service (NASS) would like to renew the two annual bee and honey surveys currently approved under OMB No. 0535-0153. In addition NASS would like to merge this renewal with the Colony Loss Survey docket (0535-0255) to reduce respondent burden, particularly on smaller operations (those with fewer than 5 colonies).

**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 primary functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices, and to collect information on related environmental and economic factors. Crop and livestock statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. Modern agriculture increasingly calls upon NASS to supply reliable, timely, and detailed information through its commodity estimation program. 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 surveys are conducted in all States. These 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.

The Agricultural Research Service (ARS), State-level apiarists, and agricultural colleges throughout the U.S. use NASS bee and honey data to administer their honey bee research programs. Current research projects at ARS focus on colony collapse disorder, parasites, Africanized honey bees, foul brood disease, food safety and inspection (including honey), and other topics.

The Agricultural Marketing Service (AMS) uses NASS honey production data as control data for the administration of the research and promotion program. 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 National Honey Board for research and development, advertising and promotion of honey and honey products, consumer education, and industry information, under AMS supervision. The National Honey Board administers the research and promotion programs and reimburses the Federal government for the costs incurred in implementing and administering the program.

The Economic Research Service (ERS) uses NASS honey data to construct U.S. and per capita caloric sweetener consumption estimates. 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. Economic data published in the *Honey* report is also used to prepare valuations related to pollinators.

The Farm Service Agency (FSA) uses NASS honey production data as source data. The Farm Security and Rural Investment Act of 2002 provides that the 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 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. The program will use a 5-year average honey yield at the state level and the annual average honey price at the national level, both based on NASS data, to determine insurance payments.

The Pollinator Health Task Force uses data from the *Honey Bee Colonies* report to monitor honey bee colony losses during winter. Their goal, as laid out in the Pollinator Research Action Plan, is to reduce these losses to no more than 15 percent within 10 years.

**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.**

NASS’s Questionnaire Repository System (QRS) was built to enable the simultaneous creation of comparable paper and web survey instruments for almost any survey. Web-based data reporting for the bee and honey surveys was approved and conducted for the first time back in December 2003. In 2016, 6.0% of the operations responding to the Bee and Honey Survey completed the questionnaire by use of the internet. In 2016, 5.4% of the Colony Loss 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 agriculture departments and 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 these surveys are not available from any other source.

Starting in 2018, NASS will merge the annual Bee and Honey Survey with the annual Colony Loss Survey for operations with fewer than five colonies, so respondents will receive only one questionnaire. For operations with five or more colonies, delivery of separate Bee and Honey and Colony Loss questionnaires will be coordinated so that respondent burden is minimized as much as possible.

**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 19,025 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 diminish the ability to track changing trends in the honey industry. The frequency of the report has evolved to meet the needs of customers and yet minimize the burden on the reporting public.

After attending numerous meetings and tradeshows around the country, NASS has obtained a great deal of input from beekeepers and other data users as to what sort of published data they need and what sort of production data individual growers can provide relating to colony loss and colony health. It was determined that health data on bee colonies should be collected quarterly in order to be able to monitor trends in colony loss closely and to reduce possible errors in respondent memory recall.

With the merging of the Bee and Honey docket with the Colony Loss docket it was decided that the optimal compromise in minimizing respondent burden while collecting timely and useful data would be to collect data from operations with fewer than five colonies in January of each year for the data from the two surveys (Bee and Honey, and Colony Loss) for the previous year. Operations with five or more colonies will be contacted by NASS to collect colony loss data for the previous quarter and honey production data in January for the previous year.

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 July 19, 2017 on pages 33042 - 33043. There are no public comments on this renewal.

**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: 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., Jesup, Georgia; and Dennis van Englesdorp, 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.**

Burden hours based on the average completion time per questionnaire are summarized below.

NASS uses the Bureau of Labor Statistics’ Occupational Employment Statistics (most recently published on March 31, 2017 for the previous May) to estimate an hourly wage for the burden cost. The May 2016 mean wage for bookkeepers was $19.34. The mean wage for farm managers was $36.44. The mean wage for farm supervisors was $23.47. The average of the three is $26.42. The annual estimated reporting time of 10,274 hours is multiplied by $26 per hour for a total cost to the public of $267,124.

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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 merged Bee and Honey Surveys and the Colony Loss surveys is approximately $1.8 million annually. About $1,600,000 of the total is for Federal salaries, $130,000 for telephone and field enumeration by NASDA employees (National Association of State Departments of Agriculture), and $70,000 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 52,225 responses and 10,274 hours of burden. Several program changes were made due to the merging of this docket with the Colony Loss docket (OMB # 0535-0255). The changes include the merging of questionnaires for operations with less than five colonies; the adding of the quarterly Colony Loss survey; changes made to the sampling for the operations with five or more colonies; the addition of cognitive testing; and changes to publicity materials as a result of these other changes. The program changes 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.**

Operations with five or more colonies will be mailed a Bee and Honey questionnaire at the end of December referencing production data for that calendar year.

Operations with fewer than five colonies will be mailed a combined questionnaire collecting bee and honey data along with data on the health and loss of colonies on their operation, at the end of December, referencing data for that calendar year.

Operations with five or more colonies will continue to receive quarterly Colony Loss Surveys. Questionnaires will be mailed on or about the 1st of January, April, July, and October for the preceding reference period.

Operations that do not respond by mail or internet within a couple of weeks to any of these surveys will receive a phone call or in-person visit for enumeration. After data collection is complete, the data will be edited for reasonableness and completeness. The data will then be summarized. Summarization and preparation of estimates by NASS Regional Field Offices (RFOs) are completed and sent to Headquarters. Headquarters acts as the clearing house for multi-State data from RFOs. 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>

Honey 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 (regardless of color class) at the State and U.S. level. Some State estimates may be combined to avoid disclosing data for individual operations.

The “Honey Bee Colonies” report is published from Headquarters in early August. This report will contain data for all four quarters.

<https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1943>

**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 2017