

JUSTIFICATION FOR CHANGE  
to  
**REPORTING AND RECORD KEEPING REQUIREMENTS UNDER  
REGULATIONS (OTHER THAN RULES OF PRACTICE) UNDER THE  
PERISHABLE AGRICULTURAL COMMODITIES ACT, 1930.**

**OMB NO. 0581-0031**

**March 2018**

This Justification for Change requests OMB approval to update OMB approved 0581-0031, Forms FPHP-231-1 PACA License Renewal Application; FPHP 231-1A PACA License Reinstatement Notice; and FPHP 231-2 PACA License Renewal Application. The Perishable Agricultural Commodities Act (PACA) (7 U.S.C. 499a-499t) and PACA Regulations (7 CFR Part 46) require nearly all persons who operate as commission merchants, dealers, and brokers buying or selling fruits and/or vegetables in interstate or foreign commerce to be licensed. The license is effective for three (3) years for retailers and grocery wholesalers, unless withdrawn by USDA for valid reasons [7 CFR 46.9 (a)-(h)], and must be renewed on a triennial basis.

**FPHP 231-1, FPHP 231-1A, FPHP 231-2**

We are requesting the same change be made on Page 1 on each of these three forms:

Page 1: We are removing the column requesting Social Security Number. We have decided in today's climate of safeguarding Personally Identifiable information (PII), that we will no longer require applicants to provide a social security number. We will replace that column with EIN number request.

This Justification for Change will not increase the currently approved responses or burden hours.