**Justification of Change Worksheet**

**Report Forms Under Milk Marketing Order Programs (from Milk Handlers and Milk Marketing Cooperatives)**

**OMB 0581-0032**

**August 2018**

**This Justification request is to merge two information collections into OMB 0581-0032.** Because rulemaking was involved to establish a California Federal Milk Marketing order, new collections were created: One to establish the Order and one to conduct a referendum to determine producer approval of a new California FMMO. Within the rules, supporting statements and Federal Register Notices currently approved, it states that upon OMB approval the collections will be merged.

In the parent collection (0581-0032) there are 10 existing FMMOs. The California dairy industry requested promulgation of a FMMO for California similar to the 10 existing FMMOs throughout the United States. With this submission 8 approved forms (4 referendum ballots (0581-0300), and 4 forms from the Order (0581-0298) for the California Federal Milk Marketing Order will be added to the 0581-0032 collection.

* **0581-0300, Report Forms under a California Federal Milk Marketing Order (from Milk Handlers and Milk Marketing Cooperatives) (Referendum Procedures)**
* This collection contains the forms for: Milk Producer’s Ballot; Cooperative Association Ballot; Cooperative Association Intent to Bloc Vote; and Certificate of Resolution. These ballot forms were used to determine producer approval of the California FMMO and are no longer needed to stand as a separate information collection.

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| --- | --- | --- | --- | --- |
| No. of Respondents | No. of Responses Per Respondent | Total Annual Responses | Hours Per Response | Total Hours |
| 1,438 | 1.01 | 1,453 | .25 | 363.25 |

* **0581-0298, Report Forms under a California Federal Milk Marketing Order (from Milk Handlers and Milk Marketing Cooperatives)**

Part of the Market Administrators’ duties are to prescribe reports required of each handler to assure that handlers properly account for milk and milk products, and that such handlers pay producers and associations of producers according to the provisions of the FMMO. All of the required FMMO reporting forms are completed by regulated milk handlers and milk marketing cooperatives. The California FMMO requires regulated entities to submit some of the same forms with slight modifications to identify the CA FMMO already approved by OMB 0581-0032 and used by handlers under the 10 existing FMMOs.

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| --- | --- | --- | --- | --- |
| No. of Respondents | No. of responses per Respondent | Total Annual responses  | Hours Per Response | Total Hours |
| 55 | 1.06 | 2,022 | 36.76 | 2,138.35 |

These totals would be added into the totals of respondents already approved under the 0581-0032 because it represents a different geographical area from the currently approved existing 10 FMMOs. Upon approval of this merge, AMS will submit a discontinuation request for 0581-0298, and 0581-0300 to prevent duplicity.

**GRAND TOTAL TO BE MERGED:**

 **BURDEN HOURS 2,501.6 (rounded to 2,502)**

 **RESPONSES 3,475**

 **RESPONDENTS 1,493**