

**2018 SUPPORTING STATEMENT  
EXPORT CERTIFICATE REQUEST FORMS  
OMB NO. 0581-0283**

**A. Justification.**

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

The United States Department of Agriculture, Agricultural Marketing Service, Dairy Programs, Dairy Grading Branch is a user-fee funded agency providing grading and inspection service to the dairy industry. The program was established under The Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627). Under the Act, Title II, Section 203 states that the policy of Congress is "To develop and improve standards of quality, condition, quantity, grade, and packaging, and recommend and demonstrate such standards in order to encourage uniformity and consistency in commercial practices." Section 203 (h) clarifies the policy, "To inspect, certify, and identify the class, quality, quantity, and condition of agricultural products when shipped or received in interstate commerce, under such rules and regulations as the Secretary of Agriculture may prescribe, including assessment and collection of such fees as will be reasonable and as nearly as may be to cover the cost of the service rendered, to the end that agricultural products may be marketed to the best advantage, that trading may be facilitated, and the consumers may be able to obtain the quality product which they desire, except that no person shall be required to use the service authorized by the subsection."

**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.**

The Marketing Act of 1946 is used by USDA, cooperating State inspectors and users as a basis of authority under which official inspection and grading services are provided. The forms requested will provide a format for exporters to provide information to the Dairy Grading Branch on consignments they wish to export so that the Dairy Grading Branch can issue the proper health certificate with the information required by the importing country. The information gathered from the applicants is transferred to the proper health certificate, certified by the proper authority and returned to the exporter. A copy of the export certificate is kept for reference. The collection of the information on the forms is necessary for the

Dairy Grading Branch to be able to properly complete the required export certificate.

**Request for Applicant Number, DA-228** is completed by the applicant prior to the performance of requested service and provides identification of the party responsible for payment of the fees and expenses. This form requires the applicant to provide the information necessary to identify the applicant as a unique entity in the Financial Management Modernization Initiative (FMMI). The applicant is asked to provide company name, business name if different from company name, Federal Tax Identification Number, billing address, contact information of the account payable department, e-mail addresses for the company and the accounts payable departments, and who requested the applicant number. The Federal Tax Identification number is required by the **Federal Debt Collection Procedure Act of 1990**. All entities doing business with the Federal Government are required to provide the Federal Tax Identification number before an account can be set up.

**Request European Union Health Certificate, DA-253:** There are four of the same versions of DA-253. The difference in each version is (1) EU Transit, (2) EU Composite, (3) EU Composite Transit, and (4) EU HTB. Each version is asking for different method of transit, composite transit, composite product, and HTB. These respondents and burden hours are reported collectively.

#### SANITARY CERTIFICATE REQUEST DATA ELEMENTS

Since importing countries require a lot of the same information, a data base/information request was developed that covers all the data elements for all the export certificates. For the request form for any particular country we select those data elements that are required for that country. The result is that on the request form data elements are not necessarily sequentially numbered. (The first 12 data elements are the same for all requests.)

The following information describes a sampling of the types of data collected as specified by country. Countries are Algeria, Argentina, Brazil, Chile, China, Cuba, The European Union, Peru, Tunisia, Uruguay, and Morocco. As new countries are added, we will update the burden through a *Justification for Change* to the approved collection.

- Contact Name
- Customer Number
- Billing Reference
- E-mail Address
- Mailing address
- Contact Phone
- FAX

- Company
- Account Number

#### MAIL CERTIFICATE TO:

- Company
- Contact
- Street
- City
- State
- ZIP
- Type
- Faxed Certificate
- Additional Copies

#### EXPORTER

- Name
- Address
- City, State

#### IDENTIFICATION OF DAIRY PRODUCTS

- Description of Commodity
- Product Identification
- Animal Species
- Kind of Heat Treatment (HTST; PAST.)
- Type of Packaging
- Number of Packaging Units
- Net Weight
- Gross Weight
- Required Temperature During Storage and Transportation
- Date or Period of Production
- Product Lot(s) and/or Date of Manufacture
- Lot Number
- Lot Code
- Quantity (Bags/Cartons)
- Identification Marks
- Date Produced
- Expiration Date
- Production Date
- Expiry Date

#### SHIPMENT INFORMATION

- Departure Port
- Entry Port
- Transport
- Ship Name

- Container Number
- Seal Number

#### CONSIGNOR

- Name
- Address

#### CONSIGNEE

- Name
- Address

#### MANUFACTURER

- Name
- City, State
- Plant Number
- Lot Number
- Production Date
- Number of Units
- Net Weight

#### DESTINATION/DESTINATION OF GOODS

- Exporter Name
- Exporter Address
- Name of Receiver
- Consignee Address
- Place of Loading
- Place of Destination
- SENASA Permit Number
- Place of Loading; City, State
- Destination City
- To
- Transit Countries
- Method of Transport
- Container/Coach
- Name of Receiver
- City

#### PLACE OF LOADING

- City, State

#### PRODUCER

- Name
- Address

#### IMPORTER

-Name  
-Address  
-Ship Name and Voyage Number

ORIGIN

-Country of Origin

SIGNATURE

-Signature of Agent for Applicant  
-Date

- 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.**

In Accordance with the E-Government Act, the Dairy Grading Branch is continually involved in review of computer applications. The export certificate request forms under this requested approval are available in online application, PDF-fillable, and MS Word-fillable format. All the forms are available as an on-line application which allows applicants to directly request the desired export certificate or e-mail their application directly to the Dairy Grading Branch which would process it electronically. These forms are available on the AMS, Dairy Programs website at: <http://origin-staging.ams.usda.gov/services/imports-exports/dairy-exports>.

The entire export certificate program is now a fully automated system. The United States government has worked with the governments from numerous countries to transfer export certificates electronically and eliminate the need for paper documents altogether.

The United States is currently transmitting health certificates electronically to the European Union and China. To participate in this program the applicant must sign up for the USDA's eAuthentication program. The eAuthentication program gives the user a secure unique identification for using USDA on-line programs. Once the user has an eAuthentication ID they can log into the Electronic Trade Documents Exchange system (eTDE) and request export certificates for the European Union, China, Chile, Columbia. Applicants are allowed to keep templates of previous submissions on file to minimize the need to re-enter the

recurring information on the requests. The system would also allow the applicants to attach other documents such as manifests; certificates of analysis; or invoices to the certificate that they may need to clear border inspection points. Once the applicant has completed their request, the request is transmitted to the proper competent authority in the United States that is responsible for certifying the health declarations required by the importing country. The competent authority reviews the information, and if applicable, certifies the shipment. The certified health certificate is then transmitted via the internet to the applicant and to the border inspection point through which the product will enter the foreign country. The authorities at the border inspection point use the certified health certificate as part of the supporting documentation to clear the product for shipment into the country.

**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.**

The information that identifies the production in the shipment is unique. The importing country requires information on the export certificate that uniquely identifies the product in the shipment. Even if an exporter ships similar shipments to the same destination, the production identifiers will be unique. Therefore the information for each shipment must be collected at time of shipment, forwarded to the Dairy Grading Branch so that an export certificate can be generated and accompany the shipment to the destination country.

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

The export certificate request forms require only a minimal amount of information, which can be supplied without data processing equipment or a trained statistical staff. The primary sources for this information are the invoices; production records and bill of lading for the consignment being exported. This information is available on other documents that are required for shipping the product. The information and collection burden is relatively small and requires the same amount of reporting requirements for all respondents and does not significantly disadvantage any respondent that is smaller than the industry average. Based on current applicants it is estimated that 50 percent of the applicants are considered small businesses. The burden on small businesses is not an obstacle since the completion of the involved forms requires minimal time and readily available information.

**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 Dairy Grading Branch was not allowed to collect this information it would be unable to issue export certificates and US dairy producers would be unable to export their products to a major portion of the world. The forms are designed to meet the needs of the industry for export certification while collecting the minimum amount of information.

**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;**

**-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 3 YEARS;**

There are no requirements for the applicant to keep copies of these forms once they are submitted to the Dairy Grading Branch. It is expected that in the normal course of business the applicants would keep a record for their use.

**-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 STATUE 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.**

The information is submitted by exporters as needed to fulfill their needs for export certificates. Some of the information required on the export certificates is considered proprietary, for example shipment details. Confidential and proprietary information will be withheld from public view under the Freedom of Information Act, 5USC552.

- 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.**

The Agency published the notice of information collection and request for comments, in the Federal Register on November 8, 2018, Vol. 83, No. 217, page 55851. The 60-day comment period ended on January 7, 2019.

- **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.**

We asked three industry representatives to test completing the form and provide feedback. All stated the form was relatively easy to complete within the estimated time.

Kao Zoua Thao  
Milk Specialties Global  
7500 Flying Cloud Drive  
Suite 500  
Eden Prairie, MN 55344

Shannon Greene  
Bluegrass Dairy and Food, Inc.  
606 West Main St.  
Springfield, KY 40069

Jenarae Alvarado  
Leprino Foods  
1830 W. 38th Avenue  
Denver, CO 80211

The export certificate request forms in this collection are developed in cooperation with the Food and Drug Administration (FDA), the USDA Animal Plant Health Inspection Service (APHIS), USDA Foreign Agricultural Service (FAS) and the U.S. Dairy Export Council (USDEC) to facilitate international trade.

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

“No payments or gifts are provided to respondents.”

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

Confidential and proprietary information will be withheld from public view under the Freedom of Information Act, 5USC552.

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.**

No information of a sensitive nature is requested.

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. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.**

**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.**

Estimates of the burden of collection of information are summarized on AMS Form 71.

- **PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR**

**COLLECTIONS OF INFORMATION, IDENTIFYING AND USING  
APPROPRIATE WAGE RATE CATEGORIES.**

Total annual cost burden on the 265 respondents is expected to be \$516,733 (rounded). Based on the average median hourly wage rate of \$37.90 with an additional 31.8% to account for benefits and compensation, for an hourly wage total of \$49.95 was used to calculate annual cost. Annual cost for this collection is estimated using the national mean hourly rate of \$37.90 contained in the National Compensation Survey: Occupational Employment and Wages, May 2017, published by the Bureau of Labor Statistics ([https://www.bls.gov/oes/2017/may/oes\\_stru.htm](https://www.bls.gov/oes/2017/may/oes_stru.htm)). Costs of benefits and compensation guidance provided by Bureau of Labor Statistics News Release issued on June 8, 2018 salary for a Sales Representative.

**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 capitol/startup or operation/maintenance costs associated with this collection.

- 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 issuance of the export certificates that the applicants request using these “Export Certificate Request Forms” is one of the services that the Agricultural Marketing Service, Dairy Grading Branch provide on a user-fee basis. The applicant is charged an appropriate fee for the certificate to cover the Government costs of issuing the certificate. All Federal Government costs are recovered through these fees. It is estimated that there will be no additional cost to the government.

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

Due to changes in markets since the last submission, the number of respondents has increased by 15. The number of requests for AMS certificates continues to

rise resulting in an increased number of export responses of 9,616. The increased number of responses resulted in an increase of 1,823 burden hours (rounded).

- 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.**

The collected information will not be published. It will be used to generate an export certificate that is returned to the applicant.

- 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.**

The agency requests approval not to display the expiration date for OMB approval of these forms. The forms will not expire but will change as foreign governments change their requirements. Historically the requirements of foreign governments for the information on certificates that the forms collect has changed regularly. Forms will mainly be used as online forms and minimal hard copies will be produced.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

### **COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The proposed information collection procedures do not employ statistical methods of collection. The records that must be maintained are unique to individual production days of product or are for specific pieces of equipment or utensils. The information is used by interested parties to identify a finished product, equipment or utensils on covering certificates.