

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
NMFS Implementation of International Trade Data System
OMB Control No. 0648-0732

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The National Marine Fisheries Service (NMFS) has established procedures for United States (U.S.) importers and exporters to electronically file trade documentation for certain fishery products to meet requirements of the Safety and Accountability for Every Port Act of 2006, the Magnuson-Stevens Fishery Conservation and Management Act, other applicable statutes, and obligations that arise from U.S. participation in regional fishery management organizations (RFMOs). Specifically, NMFS has worked with U.S. Customs and Border Protection to automate entry and export filing of NMFS-required information through its implementation of the International Trade Data System (ITDS).

Domestic law and international obligations require that NMFS collect information about the harvest of certain fishery products when these products are entered into U.S. commerce and/or exported from the United States. To this end, NMFS has implemented a number of trade monitoring programs to collect information from the seafood industry regarding the origin of certain fishery products. The purpose of these programs is to determine the admissibility of the products in accordance with the specific criteria of the trade measure or documentation requirements in effect for the species of fish that are being imported or exported.

On August 3, 2016, NMFS issued a final rule (81 FR 51126) to establish an electronic International Fisheries Trade Permit (IFTP) that integrated the collection of fisheries trade documentation under three existing monitoring programs with approved information collections: Antarctic Marine Living Resources (AMLR) (50 CFR 300 Subpart G, OMB Control No. 0648-0194), Highly Migratory Species (50 CFR 300 Subpart M, OMB Control No. 0648-0040 and OMB Control No. 0648-0327), and the Tuna Tracking and Verification Program (50 CFR Part 216, OMB Control No. 0648-0335). On December 9, 2016, NMFS published a final rule (81 FR 88975) to implement the Seafood Import Monitoring Program (50 CFR part 300 Subpart Q, OMB control No. 0648-0739). On April 24, 2018, NMFS issued a final rule (83 FR 11762) to include shrimp and abalone within the requirements of the Seafood Import Monitoring Program (50 CFR part 300 Subpart Q, OMB control No. 0648-0776).

NMFS proposes to merge the existing information collection requirements of 0648-0739 and 0648-0776 into collection 0648-0732 for electronic reporting of trade data. The consolidation would include the issuance of the NMFS international trade permit for regulated seafood products subject to these four programs, stipulate data and documentation that must be provided electronically to U.S. Customs and Border Protection (CBP) to determine admissibility at the time of entry, ensure that seafood exports are properly documented as to origin, and address recordkeeping requirements to support review of entries that are selected for audit.

These trade monitoring programs enable the U.S. to identify and/or exclude certain fisheries products that do not meet the criteria for admissibility to U.S. markets, including products

resulting from illegal, unregulated, and unreported (IUU) fishing activities and products that are misrepresented as dolphin-safe. For exports, the U.S. can validate lawful acquisition of U.S harvested or re-exported seafood products to ensure acceptance in foreign markets.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

As a result of domestic authorities and/or multilateral agreements, NMFS has implemented a number of monitoring programs that collect information from industry regarding the origin of certain fishery products. The purpose of these programs is to determine the admissibility of the products, in U.S. or foreign markets, in accordance with the specific criteria of the trade measure or documentation requirement in effect. NMFS trade monitoring programs cover tunas, swordfish, billfish, shark fins, Patagonian and Antarctic toothfish, Antarctic krill and certain other fishery products under the authority of the Magnuson-Stevens Fishery Conservation and Management Act and/or the High Seas Driftnet Fisheries Enforcement Act. Generally, these trade monitoring programs require anyone who intends to import, export, and/or re-export covered species to: obtain a permit from NMFS, obtain documentation on the flag-nation authorization for the harvest from the foreign exporter, and submit this information to NMFS at the time of entry or export. Depending on the commodity, specific information may also be required, for example, the flag state of the harvesting vessel, the ocean area of catch, the fishing gear used, the harvesting vessel name, and details and authorizations related to harvest, landing, transshipment and export.

These monitoring programs require the importer to submit documentation that provides catch and/or other statistical information to NMFS, while other relevant information on the inbound shipments is provided by the dealer, importer, shipper, carrier, or customs broker to CBP by filing an electronic entry in the Automated Commercial Environment (ACE). The SAFE Port Act requires all federal agencies collecting data for the purposes of determining admissibility to use the ACE portal to collect that data electronically as part of the entry filing. Therefore, NMFS has issued regulations to require electronic filing of a message set in the ACE portal.

NMFS reviews and reconciles the information reported by importers in ACE that is received from CBP and, where applicable, from the relevant RFMO or harvesting or exporting/re-importing nation to determine if the admissibility requirements have been satisfied. If the documentation is incomplete, fraudulent or missing, or if the shipment is not admissible given its ocean area of harvest, flag country of the harvesting vessel, or the circumstances under which it was harvested, entry into U.S. commerce may be prohibited for that shipment and the shipment may be subject to forfeiture. In addition, the importer or other responsible party may be subject to enforcement action. Likewise, U.S. exporters must provide similar documentation for use by foreign importing nations that are also parties to the trade monitoring agreements.

As an ITDS partner government agency, access to the Automated Commercial Environment (ACE) portal maintained by CBP has improved NMFS' ability to evaluate trends and potential problems with seafood imports, including potential cases of seafood fraud (e.g., tariff code misspecification), or imports lacking proper documentation. ACE has helped NMFS communicate with the seafood industry to educate importers and brokers on documentation requirements. It has also helped NMFS target enforcement resources using a risk management approach and has improved the Agency's ability to intercept illegal shipments by providing

access to real time information on shipments coming into U.S. ports of entry. NMFS estimates that ITDS integration has resulted in reduced reporting burden for the seafood industry, reduced data processing time for government, increased compliance with product admissibility requirements, faster admissibility decisions, and more effective enforcement.

With the establishment of a consolidated International Fisheries Trade Permit (IFTP), NMFS collects application information electronically via a portal website. This one permit meets the requirements of all the NMFS trade programs. After receiving an IFTP, the importer or exporter (in most cases working through a customs broker) would provide CBP with a required data set and electronically attach any required additional image files of documents so that CBP and NMFS authorities are able to determine whether said shipment is eligible for entry into, or exit from, the United States.

Although the information collected is not expected to be disseminated directly to the public, it may be used in the development or review of fishery management plans and associated regulatory documents, and summarized/aggregated when provided to RFMOs to fulfill the reporting requirements of international trade monitoring programs. When information is reported, it is subject to NOAA's Information Quality Guidelines. NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. Should NMFS decide to disseminate the information, it will be subject to quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

NMFS has established a web-based National Permitting System for initial application and annual renewal of the consolidated IFTP. The permitting system is accessible by the public at: https://fisheriespermits.noaa.gov/npspub/pub_cmn_login/index_live.jsp

IFTP holders are required to submit a data set electronically to CBP via the ACE portal in conjunction with the filing of the CBP entry summary (CBP Form 7501, OMB Control No. 1651-0022) or a shipper's export declaration via the Automated Export System (AES). When entries are selected for audit, importers may send scanned copies of supply chain records to NMFS via electronic means.

4. Describe efforts to identify duplication.

The consolidated IFTP reduces duplication for applicants who previously applied for international trade permits in multiple programs. Also, the implementation guide for submitting the NMFS Message set via ACE (<https://www.cbp.gov/trade/ace/catair>) enables software developers to reduce duplication in data entry to meet the requirements of multiple trade monitoring programs by simply re-formatting the data for each specific message set. The ACE implementation guide lays out the information to be provided under each of the trade programs (Tuna Tracking and Verification Program, AMLR Trade Program, the HMS International Trade Program and the Seafood Import Monitoring Program). Additionally, the supply-chain recordkeeping of the Seafood Import Monitoring Program allows importers to use documents already in commercial use or already completed to meet other government requirements. No

new forms are required to document the supply chain (see the audit guide at: <https://www.iuufishing.noaa.gov/Portals/33/SIMP%20Audit%20Guidance.pdf?ver=2018-05-03-144502-367>).

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Since most of the respondents (importers/exporters) are considered small businesses, separate requirements based on size of business have not been developed. Only the minimum data required to determine admissibility and satisfy RFMO reporting requirements is required as part of entry filing or export declaration.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If the collection is not conducted, the Secretary of Commerce will not be able to meet the mandates of the laws and international obligations described above. The United States would not be able to implement RFMO trade monitoring program requirements, which could result in U.S. fishermen and fish dealers being excluded from business opportunities should other nations deny entry of U.S. products to their markets. In addition, U.S. consumers and fish harvesters would not be protected from illegal or misrepresented fish from entering the U.S. supply chain.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

Collection of information will be made in a manner consistent with OMB guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A Federal Register notice was published on June 5, 2019 (84 FR 26075) for renewal of this information collection (-0732) and the merger with related collections (-0739 and -0776). NMFS posted that notice on its website along with information on the trade monitoring program requirements. No public comments were received relative to the burden estimates, duplication or the need for these information collections.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made to respondents under these trade monitoring programs.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

As stated on relevant websites and in compliance/implementation guides, the information collection is considered confidential as required by section 402(b) of the Magnuson-Stevens Act, 16 U.S.C. 1881a(b), and NOAA Administrative Order 216-100. Where other information collection authorities apply (e.g., Atlantic Tunas Convention Act, Antarctic Marine Living Resources Convention Act), information collected will be handled in compliance with agency filing and retention policy as well as the data sharing provisions of the authorizing statutes.

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.

There are no questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

In estimating the burden, NMFS has assembled data on respondents currently engaged and responses currently received under the several existing trade programs. These estimates include only the time need for preparation and submission of the message set to the ACE portal, and in the case of entries selected for audit, the time needed to submit supply chain records to NMFS. Other aspects (e.g., forms and recordkeeping) of the respective information collections for each program are approved under the individual programs (i.e., 0648-0194 for AMLR, 0648-0040 for HMS and 0648-0335 for TTVP).

All aspects of the SIMP reporting program are included in this collection because it is entirely electronic. No forms are prescribed for SIMP, because the regulations allow for the harvest event information to be recorded and transmitted through the supply chain by any paper or electronic means that is otherwise required (foreign government or business to business contracts) or efficient for industry. However, a model catch certificate has been provided by NMFS for the benefit of foreign exporters and U.S. importers so that the information requirements of the NMFS-specific message set are clear and can be recorded at harvest for transmission through the supply chain in the event that no other government or business requirements pertain to the specific harvest event. The model certificate is posted at:

https://www.iuufishing.noaa.gov/Portals/33/NMFS_ModelCatchFormrev.pdf?ver=2017-12-07-174538-023

To estimate labor cost of respondent burden, NMFS applied the mean wage rate of Buyers and Purchasing Agents (Bureau of Labor Statistics Code 13-1020). This labor category most closely corresponds to fish importers and customs brokers who will be knowledgeable of the origin of the fish products, code the message set, submit electronic entries in ACE and respond to record requests when selected for audits. As of May 2018, the mean wage rate for this occupation series was estimated at \$32.47 per hour (see: <https://www.bls.gov/oes/current/oes131020.htm>).

1. International Fisheries Trade Permit

Approximately 1,800 International Fisheries Trade Permits are issued annually. The online permit application process, including an abbreviated process for renewals, is estimated to require 20 minutes on average. For 1800 respondents, this represents a burden of 600 hours and a total

annual labor cost of \$19,482 at an estimated \$32.47/hour labor rate.

2. Data Set Submission in ACE/ITDS

For the four trade monitoring programs combined, approximately 177,600 entries and export declarations are filed annually. Response time in terms of preparing the relevant message set varies depending on the specific program requirements and the number of harvest events contributing to the contents of the individual shipment. A weighted average across all programs is estimated to be approximately 18 minutes to prepare and submit the message set to ACE.

For 177,600 responses, this represents a burden of 54,550 hours and a total annual labor cost of \$1,771,239 at an estimated \$32.47/hour labor rate.

3. Supply Chain Recordkeeping

For approximately 177,600 entries and export declarations that are filed annually, it is estimated that organizing and filing records takes about 16 minutes per event on average. Records must be maintained for two years and made available to NMFS upon selection for an audit.

For 177,600 responses, this represents a burden of 46,567 hours and a total annual labor cost of \$1,512,020 at an estimated \$32.47/hour labor rate.

4. Audit Response

Under the prior approval of the ITDS information collection (-0732), costs of submitting information in response to an audit were not included because they were captured within the respective import program information collections (-0335 TTV, -0194 AMR and -0040 HMS).

Under the prior approvals of the SIMP information collections to be merged pursuant to this submission to OMB, response times for audits were subsumed under the recordkeeping burden estimates for -0739 and -0776. Now that NMFS has experience with the SIMP auditing process, information is available to allow a separate estimate of this aspect of the burden. This is more accurate because not all entries for which records must be maintained are actually selected for audit.

Approximately 4,000 entries are selected for audit under SIMP annually. It is estimated that retrieving and submitting records electronically to NMFS takes about 30 minutes per event on average. For 4,000 responses, this represents a burden of 2,000 hours and a total annual labor cost of \$64,940 at an estimated \$32.47/hour labor rate.

5. Total Burden

The total number of respondents is estimated to be 1,800 based on annual issuance/renewal of International Fisheries Trade Permits.

The total number of responses is estimated to be 361,000. This figure includes permit applications, message set submissions on entry/export, preparation of records associated with each event, and the response to audit requests under SIMP.

A weighted average of the time for each response is approximately 17.2 minutes. For 361,000 responses, this amounts to a burden of 103,717 hours and a total annual labor cost of \$3,367,680 at an estimated \$32.47/hour labor rate.

Information Collection	Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Burden Hrs / Response	Total Annual Burden Hrs	Annual Labor \$ @ \$32.47/hr
Int'l Fisheries Trade Permit	1800	1	1800	20 min	600	\$15,000
Data set submission in ACE/ITDS	1800	99	177600	18 min	54550	\$1,771,239
Supply Chain Recordkeeping	1800	99	177600	16 min	46567	\$1,512,020
Audit Response	1800	2	4000	30 min	2000	\$64,940
TOTALS			361,000		103,717	\$3,363,199

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

NMFS has calculated a cost recovery fee of \$30 per IFTP to cover administrative expenses associated with issuing the annual permit. Based on the number of permits issued, the total annual cost burden to respondents would be 1800 importers X \$30 = \$54,000.

In addition, it is estimated that each respondent would invest in technology to maintain and retrieve records associated with entry filings. For each of the 1800 permitted traders, it is estimated that investment in information technology resources (computer, scanner, data storage) would cost \$3,000 and have a service life of 3 years. This would amount to costs of about \$1000 per year per respondent or \$1,800,000 per year for all affected importers. Annualized costs in terms of permit fees and IT investment would amount to \$1,854,000 for all respondents.

Information Collection	Respondents	Annual # of Responses / Respondent	Total # of Annual Responses	Burden Hrs / Response	Total Annual Burden Hrs	Cost Burden / Respondent	Total Annual Cost Burden
Int'l Fisheries Trade Permit	1800	1	1800	20 min	600	\$30.00	\$54,000
Data set submission in ACE/ITDS	1800	99	177600	18 min	54550	\$1,000	\$1,800,000
Supply Chain Recordkeeping	1800	99	177600	16 min	46567	\$0.00	\$0.00
Audit Response	1800	2	4000	30 min	2000	\$0.00	\$0.00
TOTALS			361,000		103,717		\$1,854,000

14. Provide estimates of annualized cost to the Federal government.

The cost for issuing the IFTP will be covered by an administrative cost recovery fee of \$30 per permit, and thus there will be no cost to the Federal government. Customs and Border Protection has allocated funds for its Automated Commercial Environment portal that will be used to handle the submission of data sets and admissibility documents.

NMFS personnel will review data and images files submitted through ACE/ITDS. With the exception of SIMP, the programmatic costs of reviewing information are captured within the respective information collections (-0335, -0194 and -0040). Because SIMP (-0739) is being merged with ITDS (-0732) those costs to government are estimated here.

The costs of ACE portal development for the NMFS message set submission have already been incurred and were shared by NMFS and CBP. Ongoing costs for ACE maintenance are borne by CBP.

For SIMP audits, the costs include staff time for review of the supply-chain records from harvest to entry filing. On average, it requires 4 hours of staff time to select an entry for audit, request and review materials, and respond to the importer on the results of the audit. For 4,000 audits per year, at 4 hours per audit, total staff time amounts to 16,000 hours. At a labor rate of \$65.00 per hour (salary and benefits), total government costs for the SIMP auditing program are estimated at \$1,038,462 annually.

15. Explain the reasons for any program changes or adjustments.

Before the Merge						How the Collections Change with the Merge					
0648-0732 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name	0648-0732 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name
Permits (current requirement for HMS and AMLR, new for TTVP)	751	5 min	63	\$22,530	International Trade Permit Form	Int'l Fisheries Trade Permit (based on actual number of permits issued)	1,800	20 min	600	\$ 54,000	No form: Application is accomplished online via the NMFS National Permit System.
Dataset Submission	15,640	1 min	261	\$		Dataset Submission in ACE/ITDS	27,600	18 min	4,550		
Admissibility Documents	13,708	5 min	1,142	\$	Fisheries Certificate of Origin Southern Bluefin Tuna Catch Monitoring Document Bigeye Tuna Re-export Certificate Bigeye Tuna Statistical Document Bluefin Tuna Re-export Certificate Swordfish Re-export Certificate Swordfish Statistical Document Southern Bluefin Tuna Re-export Form Bluefin Tuna Catch Documenting	REMOVED: Admissibility Documents (the burden for completing these documents is covered in separately approved information collections -0040 and -0335)					
Totals	30,099		1,466	\$ 22,530		NEW: Supply Chain Recordkeeping (Prev. with Admissibility documents)	27,600	16 min	9,067	\$ 279,730	No Prescribed forms. Model Catch Certificate may be used if needed.
						NEW: Audit Response	4,000	30 min	2,000		No prescribed forms. Paper or electronic records normally used to document business transactions may be used to meet supply chain audit requirements.
						Totals	61,000		16,217	\$ 333,730	
0648-0739 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name	0648-0739 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name
IFTP Requirement	2,000	5 min	167	\$ 60,000	International Trade Permit Form	REMOVED: Int'l Fisheries Trade Permit (IFTP issued under -0732 is valid for operations conducted under -0739)					No form: Application is accomplished online via the NMFS National Permit System.
Data Set Submission Requirement	11,382	12.72 hrs	144,880	\$ 600,000		Dataset Submission in ACE/ITDS	100,000	20 min	33,333		Non-shrimp entries were approximately 66% of SIMP entries in 2014 so a revised estimate was derived by taking 2/3 of 2018 SIMP entries in CBP data.
Data Storage	11,382	12.72 hrs	144,880	\$ 431,630 \$1,091,630	Model Catch Certificate w/out Aquaculture	Supply Chain Recordkeeping (Prev. Data Storage)	100,000	15 min	25,000	\$ 1,013,514	No Prescribed forms. Model Catch Certificate may be used if needed.
Totals	24,764		289,927	0		Totals	200,000		58,333	\$ 1,013,514	

0648-0776 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name	0648-0776 Information Collection	Responses	Burden time / Response	Hours	Dollars	Form Name
International Fisheries Trade Permit Application	651	5 min	54	\$ 19,530	International Trade Permit Form	REMOVED: Int'l Fisheries Trade Permit (IFTP issued under -0732 is valid for operations conducted under -0776)					No form: Application is accomplished online via the NMFS National Permit System.
ACE Data Entries	70,000	1 hr	70,000	\$1,750,000		REVISED: Dataset Submission in ACE/ITDS for shrimp entries is re-estimated by more recent CBP data	50,000	20 min	16,666		Shrimp entries were approximately 33% of SIMP entries in 2014 so a revised estimate was derived by taking 1/3 of 2018 SIMP entries in CBP data.
Totals	70,651		70,054	\$1,769,530		Supply Chain Recordkeeping (Prev. with Data Entries)	50,000	15 min	12,500	\$ 506,757	No Prescribed forms. Model Catch Certificate may be used if needed.
				0		Totals	100,000		29,166	\$ 506,757	
Grand Total	125,514		361,447	\$2,883,690		Revised All Program Totals	361,000		103,716	\$ 1,854,000	

Divergent Terminology for Information Collections 0648-0732, 0648-0739, and 0648-0776:

International Fisheries Trade Permits (IFTP): All three collections include the IFTP, but it is a consolidated permit so the number of respondents/responses is not additive across the three collections. We have used the most recent data for actual permits issued to estimate annual responses going forward under the merged collections.

Data Set Submission in ACE/ITDS: ACE Data Entries, Data Set Submission, and Data Set Submission in ACE/ITDS are synonymous. All three collections involved electronic submission of a message set via ACE. This involves the transcription of certain data elements from admissibility documents into an electronic data format and transmission of the data to ACE.

Admissibility Documents: The actual completion, transmission, and recordkeeping of paper forms is counted in other approved collections (i.e., -0035 and -0040) and is therefore being removed from this collection.

Supply Chain Recordkeeping: This SIMP requirement responses are not captured elsewhere and are added to this merged collection. SIMP does not require any prescribed forms but the U.S. importer must obtain and retain any business or government documents that link (i.e., chain-of-custody) the harvest of fish (the event reported in the ACE message set) to the shipment entered into U.S. commerce.

Audit Response: SIMP also includes responses for audits that were not previously captured. The importer is required to furnish the chain-of-custody documents if a particular import shipment is selected. This allows NMFS to validate that the imported fish are the products of the same harvest event that has been reported in ACE.

Response/Burden merging:

Previously, the responses and burden hours for 0648-0732, 0648-0739, and 0648-0776 were estimated based on the three trade monitoring programs in effect at the time of converting from paper submission to electronic reporting. There were inconsistencies between the three programs in how responses and burden were calculated. In the merging of these collections, the measure of responses was standardized and 2018 data was used.

For 0648-0739, when the responses for Data Set Submission and Data Storage were initially calculated, the 2014 number of entries filed with Customs and Border Protection was used for the species of fish included in the import monitoring program. That number was roughly 150,000 entries exclusive of shrimp entries and there were another roughly 70,000 shrimp entries. We received comment from the National Fisheries Institute that our burden estimates were too low and they provided an alternative estimate that was based on the number of imported shipping containers rather than the number of entries. As we have discussed in the past, there is not a linear relationship between the number of containers and the number of entries. There can be more entries per container (many different products in one container) or more containers than entries (multiple shipping containers with the same product). We were instructed by OMB to use the NFI burden analysis because it was higher, and we would have the "upper bound" as our approved burden level. That explains the # of entries in -0739 as 11,382 rather than 150,000. Note that we did not include shrimp in the final burden analysis because we needed to complete a separate rulemaking to address trade issues with shrimp.

When we undertook the separate rulemaking for the inclusion of shrimp in the import monitoring program, we had to submit as a separate info collection because there was another action already at OMB for a modification of -0739. Hence, we created a new collection for -0776. We could not recreate the NFI analysis based on containers, so we used the 2014 CBP data on entries of shrimp -70,000. Now that we are merging -0776 and -0732, we updated the analysis with more recent data and did not segment the recent data to determine how many entries were shrimp and how many were the other commodities included under SIMP.

The respondents for 0648-0732, 0648-0739, and 0648-0776 are the same group of respondents. The current number of trade permits issued was used to determine the number of respondents.

The increase in responses for Data Set Submission in ACE/ITDS, Supply Chain Recordkeeping, and Audit Response is a direct result of: 1) increased imports of monitored species from 2014-2018; 2) using the most recent data available; 3) adding the Audit Response requirements as stated under Question 12; and 4) including the SIMP Supply Chain Recordkeeping responses that were not previously captured.

Burden hours and cost burden decreased due to several factors: 1) updated time estimates for message set data entry and audit responses based on 2018 data; 2) elimination of duplication between paper and electronic entries; and 3) standardizing the measure of response across the monitoring programs.

16. For collections whose results will be published, outline the plans for tabulation and publication.

This collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The information required for this collection is collected on forms under other information collections. Those forms contain the expiration date of those collections. The data from those forms is then transcribed into an electronic message set for this collection. It is not feasible to include the expiration date on that message set.

18. Explain each exception to the certification statement.

There are no exceptions for compliance with provisions in the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.