

**Justification of Change Worksheet**  
**Warehouse Regulations Under the United States Warehouse Act**  
**OMB NO. 0581-0305**

**(Revised September 3, 2020)**  
**(Original April 22, 2020)**

This Justification of Change requests OMB approval to update OMB approved form, WA-502. The Justification of Change is necessary to update and strengthen the WA-502 verbiage per recommendations following a recent OIG audit. Below is a description of the required changes.

Due to the addition of verbiage to clarify procedure; thus, impacting the additional time required for recordkeeping, these changes will impact the number of respondents, responses, or burden hours from the currently approved collection. The original burden hour was .5000, totaling 5.0 hours. The revised burden hour is .7500, totaling 7.5 hours.

**CHANGES**

**WA-502: Licensing Agreement For Export Food Aid Commodity Warehouse Operators**

The OIG Recommendations are listed below as items 1-4, for your reference.

1. Review EFAC Licensing agreement for uniformity and deficiencies. Perform a review of the EFAC Licensing Agreement and make revisions to the licensing agreement as necessary to: (1) ensure uniformity in the application of standards, and (2) identify deficiencies and areas of improvement.
2. Include more specific language into licensing agreement for sanitation requirements. Incorporate specific language into the EFAC Licensing Agreement that will establish minimum standards for sanitation procedures at EFAC facilities. This language should ensure that: (1) facilities are cleaned on a daily basis when USDA commodities are stored, and (2) warehouse operators maintain written records of the sanitation activity documenting what and when cleaning activities were performed.
3. Include more specific language into licensing agreement for pest control. Incorporate specific language into the EFAC Licensing Agreement that will establish minimum standards for required documentation that demonstrates an effective pest control program.
4. Include more specific language into licensing agreement for dunnage. Incorporate specific language into the EFAC Licensing Agreement that will define the condition of the pallets used, and the appropriateness or frequency of the use of dunnage.

**Our additions and revisions to WA-502 are as follows.** Other than updating the date, the revisions are located in Section C – Duties of the Licensee. The only revisions consisted of adding the following language to each of the original subparts of Section C.

The date in the header in the upper left-hand corner from pages 2 through 14 was updated to (02-04-2020), which is when this document was last revised. The date previously stated (07-31-18).

## Section C - Duties of the Licensee

### 2. assure AMS that:

- B. ... Pallets must be thoroughly cleaned before use. Pallets must not have protruding nails, broken planks or protrusions that will potentially damage stored EFAC. Proper dunnage must be used when storing EFAC directly on floor;

### 4. maintain:

#### F. EFAC to ensure that:

- 7) proper handling and warehousing practices are used to limit any loss due to damage of EFAC;
- 8) adhere to and follow Department issued notices and directives pertaining to the repair of packaging or the repackaging of EFAC; and

#### G. a reasonably clean facility at all times, free of materials that could create a hazard or interfere with the handling of EFAC, and provide a safe environment in and around the storage and/or handling facility;

- 1) Storage areas are cleaned each business day as warehouse activity occurs;
- 2) A written record or log is to be kept of cleaning activities. The written record is to include dates and areas cleaned;

#### I. See below for changes. Item 2) is new and is to be inserted after Item 1) in the original document. Item 3) was formerly Item 2) and now has newly added language.

- 2) pest sighting log is kept identifying pests observed and/or signs indicating pest activity observed, where problem areas are located within the warehouse facility or surrounding areas, and corrective actions taken;
- 3) results of inspections and corrective actions in the pest control program are documented and records retained for three (3) years. Documents and records must include dates of inspections, individuals or companies conducting the

inspections, products and methods used, results of inspections,  
and actions taken to prevent infestation;