SUPPORTING STATEMENT U.S. ORIGIN HEALTH CERTIFICATE OMB NO. 0579-0020

TERMS OF CLEARANCE: APHIS has made little progress in converting VS Form 140, VS Form 140A, and APHIS 7001 to common forms. The Agency has many forms eligible for conversion but it has lacked the experience and time to develop a process for converting and managing them effectively. It anticipates making material progress on this project in the next several years.

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Animal Health Protection Act (AHPA) of 2002 is the primary Federal law governing the protection of animal health. The law gives the Secretary of Agriculture broad authority to detect, control, or eradicate pests or diseases of livestock or poultry. The Secretary may also prohibit or restrict the import or export of any animal or related material if necessary to prevent the spread of any livestock or poultry pest or disease. The AHPA is contained in Title X, Subtitle E, Sections 10401-18 of P.L. 107-171, May 13, 2002, the Farm Security and Rural Investment Act of 2002 [7 U.S.C. 8301, et. seq.]. Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing APHIS' ability to compete in the world market of animal and animal product trade.

The export of agricultural commodities, including animals and animal products, is a major business in the United States and contributes to a favorable balance of trade. As part of its mission to facilitate the export of U.S. animals and products, the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS)'s Veterinary Services (VS) unit maintains information regarding the import health requirements of other countries for animals and animal products exported from the United States. The *Code of Federal Regulations*, at 9 CFR part 156, states that as the laws, regulations, or other requirements (including contract specifications) for purchase and sale of animal products occasionally require vendors to furnish official certificates regarding the class, quality, quantity, or condition of the products, APHIS will inspect the processing, handling, and storage of the products at processing plants and, using information provided by the exporters, certify the class, quality, quantity, and condition of the products. Live animal export requirements and conditions are more generally covered under part 91.

To ensure a favorable balance of trade, APHIS is seeking OMB approval to continue the use of this information collection for an additional 3 years.

2. 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.

APHIS uses the following information collection activities to meet certification requirements of other countries for the export of animals from the United States:

<u>9 CFR 91.3; 9 CFR 91.7 - U.S. Origin Health Certificate, VS 17-140, VS 17-140A, and VS 17-140B (or equivalent); Export Health Certificate for Poultry or Hatching Eggs for Export (VS 17-6) (Businesses and Farms)</u>

The U.S. Origin Health Certificates are used in connection with the export of large animals, poultry (including pet birds and day-old chicks), and hatching eggs to foreign countries, are completed by APHIS-accredited veterinarians, and are endorsed by an authorized APHIS veterinarian using information obtained from owners or exporters of the animals. The information collected is used to establish that the animals are moved in compliance with APHIS regulations, to verify that the animals destined for export are listed on the health certificate by means of an official identification, and to verify to the consignor and consignee that the animals being offered for export are healthy. The U.S. Origin Health Certificates also contain the results of various tests conducted on the animals (such as tests for tuberculosis or brucellosis) and the dates the tests were conducted. In addition, all livestock, poultry, and hatching eggs intended for export from the United States must be identified in a manner that allows the animals to be correlated to the animals listed on the U.S. origin health certificate.

The collection of this information helps prevent unhealthy or untested animals from being exported from the United States, thereby preventing the international dissemination of animal diseases. The collection of this information is also necessary to satisfy the import requirements of the receiving countries, thereby facilitating trade between the United States and other regions of the world.

9 CFR Part 91 requires that all livestock intended for export by air or sea receive a visual health inspection from an APHIS veterinarian and that this inspection be conducted at an APHIS-approved inspection facility associated with the port of embarkation. To gain approval, pre-export facilities must be inspected, the procedures of the facility must be approved, and the animals be transported in cleaned and disinfected vehicles. Certifications that these conditions have been met are contained in the U.S. Origin Health Certificate. If these certifications were not provided, other countries would not accept animals from the United States.

The regulations at 9 CFR 91.3(b)(2) and (3) state additionally that live animals, semen, embryos, hatching eggs, and gametes offered for export must meet any other information or issuance requirements specified by the importing country. Further information on this requirement is set forth below in the description of the country-specific export health certificates.

<u>9 CFR 91.3 - U.S. Origin Health Certificate for the Export of Horses from the United States</u> to Canada, VS Form 17-145 (or equivalent) (Businesses and Farms)

This certificate is used in connection with the exportation of U.S. horses to Canada and is completed by APHIS-accredited veterinarians using information obtained from owners and/or exporters of the animals. The information collected is used to establish that the animals are moved in compliance with APHIS regulations, to verify that the animals listed for export are listed on the health certificate by means of an official identification, and to verify to the consignor and consignee that the animals being offered for export are healthy. The collection of this information helps prevent unhealthy animals from being exported from the United States, thereby preventing the international dissemination of animal diseases. The collection of this information is also necessary to satisfy the import requirements of Canada.

<u>9 CFR 91.3 - Export Health Certificate (VS Form 17-141 (Health Certificate for the Export of Live Finfish, Mollusks, and Crustaceans (and their Gametes)), VS Form 17-140 (U.S. Origin Health Certificate), APHIS Form 7001 (United States Interstate and International Certificate of Health Examination for Small Animals), or equivalent/country specific health certificate of export (Businesses)</u>

APHIS requires U.S. exporters to complete an export health certificate before exporting any live crustaceans and their gametes, live finfish and their gametes, or live mollusks and their gametes, if requested by the importing country. Exporters meet this requirement by completing one of the aforementioned forms. The certificates will be completed by an accredited veterinarian with assistance from the producer and must be signed by the accredited veterinarian and endorsed by APHIS as the competent Federal authority who certifies the health status of the shipment being exported. The health certificate identifies the names of the species being exported from the United States, their age and weight, place of origin, country of destination, date and method of transport, and whether they are cultured stock or wild stock.

By issuing and endorsing the health certificate, the accredited veterinarian and the Federal official (respectively) certify (1) that the live aquatic animals in the consignment have - as their place of production - a country, zone, or aquaculture establishment that has been subjected to an official health surveillance scheme according to the procedures described in the World Organization for Animal Health (OIE) Diagnostic Manual for Aquatic Animal Diseases; (2) that the country, zone, or aquaculture establishment is officially recognized as being free from all of the pathogens causing the diseases identified on the specific health certificate being endorsed; or (3) other health requirements specified by the importing country.

9 CFR 91.3 (b)(2): Country Specific Health Certificate (Businesses)

Each of the United States' trading partners has specific requirements for the entry of live animals. APHIS regulations require that in addition to providing the minimum information set forth in the U.S. Origin Health Certificate (animal species, breed, sex, and age; identification; importer, consignor, and consignee; and certification of inspection) documentation accompanying the shipment meet any other information or issuance requirements of the importing country.

<u>9 CFR 156.3 through 9 CFR 156.6 – Inspection and Certification, Animal Products</u> (Business)

Exporters may, on request, have an APHIS employee or contractor inspect animal product processing facilities to verify and provide certification that the class, quality, quantity, or condition of such of the products as are found to conform to an importing country's requirements or contract specifications. Exporters must request the inspection and provide information (as well as access to the animals) to the APHIS employee or contractor conducting the inspection.

9 CFR 91.7(c), (d) - Undue Hardship – Animals (Businesses and Farms)

In special cases, certain ports (other than those officially designated as permanently approved ports of embarkation, as described in 9 CFR Part 91) may be designated as temporary ports of embarkation by APHIS, when the exporter can demonstrate, in writing, that the animals to be exported would suffer undue hardship if moved to a permanently approved port of embarkation. The explanation of undue hardship can be submitted to APHIS via letter, fax, or email.

<u>9 CFR 91.10(a),(b) - Application for Approval of Inspection Facility-Environmental</u> <u>Certification (Businesses)</u>

Applications for permanent approval of an export inspection facility must contain basic information such as the facility's location, size, cleaning and disinfection procedures, and other critical information. The application is completed by the facility operator and must be accompanied by a certification from local environmental authorities stating that the facility complies with all applicable State or local regulations or ordinances, and the requirements (if any) of the U.S. Environmental Protection Agency, in connection with the disposal of animal wastes. These certification statements can be submitted to APHIS via letter, fax, or email.

9 CFR 91.10(c)(1) - Annual Site Inspection of Export Inspection Facilities (Businesses)

APHIS will conduct site inspections of approved export inspection facilities at least once a year for continued compliance with the regulatory standards. If a facility fails to pass the inspection, the Administrator may revoke its approval. If the Administrator revokes approval for a facility that serves a designated port of embarkation, the Administrator may also remove that port from the list of designated ports of embarkation.

<u>9 CFR 91.10(c)(2) - Opportunity to Present Views Concerning Withdrawal of Facility</u> <u>Approval (Businesses)</u>

APHIS can deny or revoke its approval of a permanently approved export inspection facility, but must first send the facility's operator a written notice at least 60 days before the date of the proposed revocation or denial. The facility operator can give APHIS a written explanation as to why approval should not be denied or revoked. This explanation can be submitted to APHIS via letter, fax, or email.

9 CFR 91.12 (a) - Certification to Carry Livestock (Businesses)

Ocean vessels must be certified by APHIS prior to initial use to transport any livestock from the United States. The owner or the operator of the ocean vessel must make arrangements prior to the vessel's arrival at a designated port of embarkation in the United States for an APHIS representative to inspect the vessel while it is at that port of embarkation. Alternatively, at the

discretion of the Administrator and upon request of the exporter, transporting company, or their agent, the inspection may be done at a foreign port.

The owner or operator of the vessel must present the following documentation to APHIS prior to its initial inspection for certification and when requested by APHIS prior to subsequent inspections for recertification:

- General information about the vessel, including year built, length and breadth, vessel name history, port of registry, call sign, maximum and average speed, fresh water tank capacity and fresh water generation rate, and feed silo capacity (if the vessel has a silo).
- A notarized statement from an engineer concerning the rate of air exchange in each compartment of the vessel.
- The species of livestock that the vessel would transport.
- Scale drawings that provide details of the design, materials, and methods of construction and arrangement of fittings for the containment and movement of livestock; provisions for the storage and distribution of feed and water; drainage arrangements; primary and secondary sources of power; and lighting.
- A photograph of the rails and gates of any pens.
- A description of the flooring surface on the livestock decks.
- The following measurements: Width of the ramps; the clear height from the ramps to the lowest overhead structures; the incline between the ramps and the horizontal plane; the distance between footlocks on the ramps; the height of side fencing on the ramps; the height of the vessel's side doors through which livestock are loaded; the width of alleyways running fore and aft between livestock pens; and the distance from the floor of the livestock pens to the beams or lowest structures overhead.

Before loading any livestock intended for export from the United States, an APHIS representative must inspect the vessel to confirm that the ocean vessel has been adequately cleaned and disinfected as required by 9 CFR 91.12(b), has sufficient food and water for the voyage as required by 9 CFR 91.12(c), and continues to meet the requirements of 9 CFR 91.12(d). APHIS will schedule the inspection after the owner or operator of the ocean vessel provides the following information:

- The name of the ocean vessel.
- The port, date, and time the ocean vessel will be available for inspection, and estimated time that loading will begin.
- A description of the livestock to be transported, including the type, number, and estimated average weight of the livestock.
- Stability data for the ocean vessel with livestock on board.
- The port of discharge.
- The route and expected length of the voyage.

The information must be provided at least 72 hours before the vessel will be available for inspection.

If APHIS determines that the ocean vessel meets the requirements of 9 CFR 91.12(d), APHIS will certify the vessel to transport livestock from the United States. APHIS may certify a vessel that does not meet all of the requirements in paragraph (d), if an exemption from the requirements the vessel does not meet has been granted to the vessel pursuant to 9 CFR 91.12(e). The certification will specify the species of livestock for which the vessel is approved. The certification will be valid for up to 3 years; however, the ocean vessel must be recertified prior to transporting livestock any time significant changes are made to the vessel, including to livestock transport spaces or life support systems; any time a major life support system fails; any time species of livestock not covered by the existing certification are to be transported; and any time the owner or operator of the ocean vessel changes.

9 CFR 91.12(a) - Inspection of Vessel Prior to Voyage (Businesses)

Prior to loading any livestock intended for export from the United States, an APHIS representative must inspect the vessel to confirm that the ocean vessel has been adequately cleaned and disinfected, has sufficient food and water for the voyage, and continues to meet the requirements of 9 CFR 91.12(d).

9 CFR 91.12 (f) - Notarized Statement (Businesses)

The owner or operator of any ocean vessel used to export livestock (including vessels that use shipping containers) from the United States must submit a written report to APHIS within 5 business days after completing a voyage. The report must include the name of the ocean vessel; the name and address of all exporters of livestock transported on the vessel; the port of embarkation; dates of the voyage; the port where the livestock were discharged; the number of each species of livestock loaded; the number of each species that died and an explanation for those mortalities; and the number of animals that sustained injuries or sustained illnesses that were significant enough to require medical attention from the personnel entrusted with the care of the animals, as well as the nature of these injuries or illnesses. The report must also document any failure of any major life support system for the livestock, including, but not limited to, systems. Any such failure must be documented, regardless of the duration or whether the failure resulted in any harm to the livestock. The report must include the name, telephone number, and email address of the person who prepared the report and the date of the report. The report must be submitted to APHIS by facsimile or email.

9 CFR 91.13 - Aircraft Cleaning and Disinfection (Businesses)

An APHIS representative must approve the time for cleaning and disinfection of aircraft. The representative will give approval only if he or she determines that the cleaning and disinfection will be effective up to the projected time the livestock will be loaded. If the livestock are not loaded by the projected time, the APHIS representative will determine whether further cleaning and disinfection are necessary.

After cleaning and disinfection is performed, the APHIS representative will sign and deliver to the captain of the aircraft or other responsible official of the airline involved a document stating that the aircraft has been properly cleaned and disinfected, and stating further the date, the carrier, the flight number, and the name of the airport and the city and State in which it is located. If an aircraft is cleaned and disinfected at one airport, then flies to a subsequent airport,

with or without stops en route, to load animals for export, an APHIS representative at the subsequent airport will determine, based on examination of the cleaning and disinfection documents, whether the previous cleaning and disinfection is adequate or whether to order a new cleaning and disinfection. If the aircraft has loaded any cargo in addition to animals, the APHIS representative at the subsequent airport will determine whether to order a new cleaning and disinfection, based on both examination of the cleaning and disinfection documents and on the inspection of the stowage area for materials, such as garbage, soil, manure, plant materials, insects, waste paper, or debris, that may harbor animal disease pathogens.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, 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.

APHIS has options for use of electronic submission and digital signature with VS-Forms 17-140, 17-140A, 140B, 17-141, 17-145, APHIS Form 7001, and others. APHIS is continually expanding options within the online Veterinary Export Health Certification System (VEHCS) which allows these forms to be scanned and submitted electronically to the system or created and digitally signed within the system, based on acceptance of such digital offerings by individual trading partners. An APHIS signature is applied by a secure, digital signature mechanism to the scanned PDF form. APHIS works with trading partners to ensure uninterrupted trade during the transition to these new format digital signatures on scanned forms. APHIS is also working to expand the VEHCS system to replace these forms entirely with a universal template within the system. This new template will be fully electronic and incorporate digital signatures. The VEHCS system may be entered through https://pcit.aphis.usda.gov/pcit/

In addition, the health certificates (VS Forms 17-140, 17-141, 17-145, and APHIS 7001) employed in this program are currently available from VS Field Offices, or by writing USDA APHIS, 4700 River Road Unit 39, Riverdale, MD 20737. An electronic PDF version of APHIS 7001 is available at <u>http://www.aphis.usda.gov/library/forms/pdf/APHIS7001.pdf</u>. An electronic version of VS 17-145 is available at <u>https://www.aphis.usda.gov/library/forms/pdf/vs17_145.pdf</u>.

The undue hardship letter, environmental certification statements that must accompany applications for facility approval, ocean vessel operator's reports, and letters to contest a denial or revocation of facility approval can be emailed or faxed to APHIS.

Many country specific health requirements and model veterinary health certificates are posted on the International Regulations (Iregs) Retrieval system at <u>http://www.aphis.usda.gov/regulations/vs/iregs/animals as well as on the Pet Travel Website at https://www.aphis.usda.gov/aphis/pet-travel.</u>

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

The information that APHIS collects in connection with the exportation of animals and animal products from the United States is exclusive to APHIS' mission of ensuring the health status of U.S. animals and quality of animal products sent to other countries. It is not available from any other source.

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

The information APHIS collects is the minimum needed to ensure that U.S. exporters meet the minimum import requirements of other countries. Eighty-five percent of the respondents to this collection are small businesses.

6. Describe the consequences 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.

The U.S. Origin Health Certificate, the proper identification of animals for export, and the approval of export animal products and inspection facilities in the United States are critical components of APHIS' export program. Without these information collection activities, APHIS would be unable to certify the health status of animals and the quality of animal products exported from the United States to other countries. Without this certification, the United States would be unable to compete in the world market of animal trade.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

- 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;

The owner or operator of any ocean vessel used to export livestock (including vessels that use shipping containers) from the United States must submit a written report to APHIS within 5 business days after completing a voyage. This requirement allows APHIS to respond quickly should any conditions exist on an ocean vessel that could threaten the health or safety of animals shipped on the vessel.

• 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;
- 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 statute 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.

No other special circumstances exist. This information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1320.6.

8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

APHIS engaged in productive consultations with the following individuals concerning its use of the information collections employed in the export of animals from the United States:

Michael A. Phillips President/CEO U.S. Livestock Genetics Export, Inc. 413 N. Broadway, Suite C Salem, IL 62881 Phone: (618) 548-9154

Greg Tyler Vice President of Marketing U.S.A. Poultry & Egg Export Council 2300 W. Park Place Blvd., Suite 100 Stone Mountain, GA 30087 770-413-0006 Paul Rodgers Director of Policy American Sheep Industry Association Route 2, Box 94 Ronceverte, WV 24970 304-647-9981

APHIS contacted these respondents by email and phone to discuss the information APHIS collects to administer its export live animal health certification requirements and animal product certificates. We discussed with them how we and they obtain the necessary data and how frequently; how much data is available; the convenience and clarity of reporting formats and other collection instruments; and the clarity of, and necessity for, any recordkeeping requirements. The respondents stated via email or phone that they had no concerns with any of these items and had no further recommendations.

On Friday, June 12, 2020, APHIS published a 60-day notice on pages 35897-35898 of the Federal Register (85 FR 35897) seeking public comment on its plans to request renewal of this collection of information. There were two public comments received from concerned citizens about their perception of the general maltreatment of animals. It had no relevance to the purpose of the collection.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

This information collection activity involves no payments or gifts to respondents.

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

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and others that are 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.

APHIS asks no questions of a personal or sensitive nature.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

• Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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.

Respondents are the owners and facility operators for sheep, goats, and horses; accredited veterinarians; live animal exporters; and owners or masters of an ocean vessel.

APHIS estimates the total annualized cost to these respondents to be \$47,132,045.05. APHIS arrived at this figure by multiplying the hours of estimated response time (694,314 hours) by the estimated average hourly wage of the above respondents (\$46.16) and then multiplying the result (\$32,049,534.24) by 1.4706 to capture benefit costs. According to DOL BLS news release USDL-20-0451, dated March 2020 (see https://www.bls.gov/news.release/pdf/ecec.htm), benefits account for 32 percent of employee costs, and wages account for the remaining 68 percent. Mathematically, total costs can be calculated as a function of wages using a multiplier of 1.4706.

The estimated hourly rate was derived from the most recent U.S. Department of Labor, Bureau of Labor Statistics March 2020 Report - Occupational Employment and Wages in the United States. See http://www.bls.gov/oes/current/oes_stru.htm.

Owners of and facility operators for sheep, goats, and horses: \$38.43 per hour [median, farmers, ranchers, and facility managers]

Owners or masters of an ocean vessel: \$49.45 [median, owners or masters of an ocean vessel – transportation, storage, and distribution managers]

Accredited veterinarians: \$50.59 per hour [median, accredited veterinarians]

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates 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.

No annual cost burden is associated with capital and startup costs, maintenance costs, and purchase of services in connection with this program.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimated cost for the Federal Government is \$11,124.993.82. (See APHIS Form 79.) Salary figures were derived from the Office of Personnel Management's GS salaries at a step 4 level.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

	Requested	Program Change Due To New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	386,191	0	150,096	200,334	0	35,761
Annual Time Burden (Hr)	424,316	0	150,096	257,050	0	17,170

Overall, the total burden increased by 407,146 hours and the total number of responses increased by 350,430 responses. The number of respondents also increased from 2,226 to 4,072.

APHIS has experienced a steady increase in export activities over the past 3 years with corresponding increases in certain respondent types and responses. The agency has also started collecting data from additional providers in the Animal Import Centers and ports. The resulting increase in burden is due largely to a more accurate accounting of all relative items, but in particular from adding certification for animal products which was previously not covered by this information collection request, as well as ensuring pets and animals other than livestock were accounted for. Overall certification numbers increased for horses exported to Canada as well. APHIS also more accurately accounted for the number of facility inspections, and for the time needed to carry out all work associated with certification (assembling information, conducting examinations and tests, etc.) Estimates are based on total responses and estimated number of respondents; all other calculations are functions of these two variables.

Adjustments to estimated times per response were the single greatest contributor to burden increases, affecting 70 percent of the previously reported activities. Port and Animal Import Center officials were solicited for data and they believed previously reported times were too low. The time adjustments caused or contributed to the burden increases in various ways.

Where this adjusted time per response estimate was the primary cause of change, 36,215 new hours were added to two activities. APHIS added 36,009 hours to the VS Forms 17-140 and 140A, U.S. Origin Health Certificate (Export Health Certificate for Poultry), activity due to its 1.5 hour estimate increase. The remaining 206 hours were added to the Inspection of Vessel activity which has a 5 hour estimate increase.

Changes to response estimates affected four activities resulting in 194,678 additional hours. VS Form 17-145, U.S. Origin Health Certificate (Export of Horses) (Farms), has an increase of

3,840 responses that coupled with the increase in estimate response time of 1.5 hours, results in 8,220 additional hours of burden. The VS Form 7001 activity has an increase of 101,250 responses and 101,902 hours of burden. County-Specific Health Certificate added 83,200 responses and 84,550 hours. Opportunity to Present Views added 6 hours of burden.

Changes to respondent estimates affected 8 activities, adding 26,158 hours of burden. A decrease of 500 respondents for VS Form 17-145, U.S. Origin Health Certificate (Export of Horses) (Business), coupled with the 1.5 hour increase in response time estimate, resulted in an increase of 12,842 hours. VS Form 17-141, Health Certificate for Export (Live Crustaceans, Finfish, Mollusks, and Gametes) has an increase of 761 respondents and 11,554 hours of burden. The Annual Site Inspection of Export Inspection Facilities has an increase of 750 respondents. Coupled with a 1.5 hour decrease in response time, the activity adds 1,500 hours of burden to the information collection request. The remaining 260 hours of burden are attributed to the remaining 5 activities -- Undue Hardship – Animals; Application for Approval of Inspection Facility - Environmental Certification; Certification to Carry Livestock; Notarized Statement; and Aircraft Cleaning and Disinfection.

There is one discretionary program change in this request. Thirty-three percent of the total burden hours for this request are attributed to the new activity, Inspection and Certification, Animal Products; adding 212 respondents, 150,096 responses, and 150,096 hours of burden. This activity was erroneously not reported in previous submissions.

Finally, the total hours reflect a decrease of 1 hour attributed to rounding adjustments.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

APHIS has no plans to tabulate or publish the information it collects.

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.

VS Form 17-140, VS Form 17-140A, and APHIS Form 7001 are used in several other information collections; therefore, it is not practical to include an OMB expiration date because of the various expiration dates for each information collection. APHIS is seeking approval to not display the OMB expiration date on these forms.

APHIS will display the expiration date on VS Form 17-145, VS Form 17-141, and VS Form 17-140B.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act."

APHIS is able to certify compliance with all the provisions of the Act.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.