

Justification of Change Worksheet
Pecans Grown in AL, AR, AZ, CA, FL, GA, KS, LA, MO, MS, NC, NM, OK, SC and TX
OMB No. 0581-0291
Marketing Order No. 986

February 2020

AMS is requesting a revision to currently approved forms outlined below. These changes will reduce the number of monthly reporting requirements, revise requirements for reporting inter-handler transfers of pecans, and make other conforming changes to the reporting requirements in the Code of Federal Regulations.

CURRENT FORM TITLES	Form Number	REVISED FORM TITLE (Merged)	Form Number	CURRENT BURDEN	NEW BURDEN	Difference
Summary Report: U.S. Pecans Received for Your Own Account	Form 1	Summary Report U.S. Pecans Received for Your Own Account	APC Form-1 (new form combines previous Forms 1 & 2)	20 mins. Per response (250 x 12 x .33=990 hrs.)	30 mins. Per response (250 x 12 x .50= 1500)	-480
Report of Shipments and Inventory On-Hand	Form 2			20 mins. Per response (250x12 x .33 = 990 hrs.)		
The above revision combining Form 1 & 2 to the new APC Form 1 would be expanded to provide space for respondents to indicate the volume of total pecans shipped, total pecans in inventory, and the number of pecans contracted for shipment.						

Inshell Pecans Exported to Mexico for Shelling and Returned to United States as Shelled Nuts	Form 5	Pecans Purchased Outside of the United States	APC Form 2 (new form combines previous Form 5 & 6)	30 mins. Per response (15x12x.50=90 hrs.)	20 mins. Per response (250x12x.33=990 hrs.)	+840.60
Pecans Purchased Outside of the United States	Form 6			20 mins. Per response (15x12x.33=59.40 hrs.)		
<p>The above revision combining Form 5 and 6 to the APC Form 2 brings these forms together for reporting the month, origin, pounds and varieties of pecans purchased outside of the United States, with another form that collects the date and pounds of inshell pecans and shelled meats exchanged between Mexico. Combining the two forms eliminated some information that was replicated. However, the greatest change was eliminating collection of import data by variety of pecans. Industry feedback indicated that tracking and reporting shipments to that level of detail was time consuming. The initial estimates for the burden of each form were made in the infancy of the FMO. Once the forms were put to practice, the Council had better information on the actual burden of each report. Eliminating the collection of variety greatly reduced the overall reporting burden on handlers as they could now report total volume without additional recordkeeping.</p>						
Report of Inter-Handler Transfers of Pecans	Form 4	Annual Agreement of Inter-Handler Transfer of Pecans	APC Form 4	10 mins. Per response (30x12x.1670=60.12 hrs.)	10 mins. Per response (30 x 1 x .1670= 5.01 hrs.)	-55.11
<p>The change to the APC-4 form is the title and reducing the requirement to submit monthly to annually. The form number would change to “APC Form 4.”</p>						

Year-End Inventory Report	Form 7	No Change to title name	APC Form 5	No Change	No Change	
The above revision for Form-7 is renumbered to APC Form 5 to keep forms in numerical sequence. All references to “crop” year on the form would be changed to “fiscal” year.						

Each form should be numbered according to “APC Form 1,” “APC Form 2,” and so forth throughout all regulations and documents, instead of “Form 1” or “APC 1.” No changes were necessary to the “APC Form 3” or to the nine ballot, nomination, or referendum forms with “SC” identifiers also contained in OMB No. 0581-0291.

The overall burden for this approved 0581-0291 collection would increase by +305 hours from 2,931 burden hours to 3,236 burden hours; and responses would decrease from 9,344 to 8,654 responses due to the modifications described above.