

**INSTRUCTIONS:** Use this form when a single information collection document involves multiple reporting and recordkeeping requirements. The totals of the figures in cols. should be entered in item 13 of OMB-83-1; cols. (D) &/or (I) = 13a (respondent is only counted once); cols. F & I = 13b; cols. H & K = 13c. (F)Total/(D)Total = (E)Average (H)Total/(F)Total = (G)Average (K)Total/(I)Total = (J)Average  
**NOTE:** The columns will calculate automatically. If Col. E's response is something other than annually, i.e., 1/6 years, list as "1/6" & decimal will display.

**TITLE OF INFORMATION COLLECTION DOCUMENT**  
**Origin of Livestock - Variance Request**

**OMB NO.** 0581-new  
**DATE PREPARED**  
 August 25, 2023

IDENTIFICATION OF REPORTING OR RECORDKEEPING REQUIREMENT			ANNUAL BURDEN								
SECTION OF REGS. (A)	DESCRIPTION (B)	FORMS NO (S) (If "none" so state) (C)	REPORTS					RECORDS			
			NO. OF RESPONDENTS (D)	NO OF RESPONSES PER RESPONDENT (E)	TOTAL ANNUAL RESPONSES (Col. D x E) (F)	HOURS PER RESPONSE (G)	TOTAL HOURS (Col. F x G) (H)	NO. OF RECORD-KEEPERS (I)	ANNUAL HOURS PER RECORD-KEEPER (J)	TOTAL RECORD-KEEPING HOURS (Col. I x J) (K)	
<b>Producers and Handlers (Operations)</b>											
7 CFR 205.103 and 205.510(b)(1)	Certified Operations & Certifying Agents maintain records for not less than 5 years	None	-	-	-	-	-	-	28	0.25	7.00
7 CFR 205.510(b)(2)	Certifying Agents maintain records for not less than 10 years	None	-	-	-	-	-	-	28	0.25	7.00
<b>Subpart C - Production &amp; Handling Requirements and E -- Certification</b>											
7 CFR 205.236	<b>Origin of livestock. (d)</b> A request for a variance to allow sourcing of transitioned animals between certified operations must adhere to the following: (i) The certified operation selling the transitioned animals is part of a bankruptcy proceeding or a forced sale; or (ii) The certified operation has become insolvent, must liquidate its animals, and as a result has initiated a formal process to cease its operations; or (iii) The certified operation wishes to conduct an intergenerational transfer of transitioned animals to an immediate family member.	None	28	1.00	28.00	1.00	28.00	-	-	-	
<b>Accredited Certifying Agents - Certification</b>											
7 CFR 205.236	<b>(d)(2)</b> A certifying agent must request a variance on behalf of a certified operation, in writing, to the Administrator within ten days of receiving the request of variance from the operation. The variance request shall include documentation to demonstrate one or more of the circumstances listed in paragraph <b>(d)(1)</b> of this section.	None	28.00	1.00	28.00	2.00	56.00	-	-	-	
<b>TOTAL OF ALL PAGES</b>			-	56	56	56	84.00	56.00	-	14.00	
<b>TOTAL - "F30" = OMB 831, 13 b; "H30" = OMB 831, 13c</b>			-		112.00		98.00				





↓



“Origin of Livestock”

REGS	REG Text
7 CFR 205.103	Certified operators & Certifying Agents maintain records for not less than 5 years
7 CFR 205.510	Certifying Agents maintain records for not less than 5 or 10 years per requirements
<b>Subpart C &amp; E - Production &amp; Handlin</b>	
7 CFR 205.236(d)(1)	<p>(d) A request for a variance to allow sourcing of transitioned animals between certified operations must adhere to the following:</p> <p>(1) A variance from the requirement to source dairy animals that have been under continuous organic management from the last third of gestation, as stated in paragraph (a)(2) of this section, may be granted by the Administrator to certified operations that are small businesses, as determined in 13 CFR part 121, for any of the following reasons:</p> <ul style="list-style-type: none"> <li>(i) The certified operation selling the transitioned animals is part of a bankruptcy proceeding or a forced sale; or</li> <li>(ii) The certified operation has become insolvent, must liquidate its animals, and as a result has initiated a formal process to cease its operations; or</li> <li>(iii) The certified operation wishes to conduct an intergenerational transfer of transitioned animals to an immediate family member.</li> </ul>
7 CFR 205.236(d)(2)	<p>(d) A request for a variance to allow sourcing of transitioned animals between certified operations must adhere to the following:</p> <p>(2) A certifying agent must request a variance on behalf of a certified operation, in writing, to the Administrator within ten days of receiving the request of variance from the operation. The variance request shall include documentation to demonstrate one or more of the circumstances listed in paragraph (d)(1) of this section.</p>

Final Rule (87 FR 19740, April 5, 2022) - Variance Request  
 OMB Control Number: 0581-New

**Q15 Breakout**

Previous Burden	New Burden	Difference Between New and Previous Burden
<b>Producers and Handlers (Operations)</b>		
0.00	7.00	7.00
0.00	7.00	7.00
<b>g -- Operators submit initial application or update existing Organic System Plan (OSI</b>		
0.00	28.00	28.00
<b>Accredited Certifying Agents - Certification</b>		
0.00	56.00	56.00
0.00	<b>98.00</b>	<b>98.00</b>

Reason for Change, Calculations, Source of Data	Type of Change
	New
	New
p)	
<p>AMS estimates that 2,832 certified organic dairy operations qualify as a small business under the SBA standard, and up to 28 of these may need to seek a variance as per (§ 205.236(d)) annually. Organic Integrity Database 8/18/2022  <a href="https://organic.ams.usda.gov/integrity/">https://organic.ams.usda.gov/integrity/</a></p>	New
<p>1 certifying agent estimated to be associated with each of the 28 operators submitting a variance request. AMS estimates 2 hours for each of the 28 requests, resulting in a new burden of 56.</p>	New



SUMMARY TABLE 1	Reporting Burden	
USDA Existing Certified Dairy Operations	Number of Respondents	Wage + Benefits
USDA Certified Producers - Domestic	17	\$58.39
USDA Certified Producers - Foreign	11	\$43.42
<i>USDA Organic Operations - All</i>	<b>28</b>	
USDA Certifying Agents Reporting Burden	Number of Respondents	Wage + Benefits
USDA U.S.-Based Certifiers	17	\$53.64
USDA Foreign-Based Certifiers	11	\$39.88
<i>Total USDA Certifiers - All</i>	<b>28</b>	
<b>All Respondents - Reporting Burden</b>	<b>56</b>	

SUMMARY TABLE 2	Recordkeeping Burden	
USDA Existing Certified Dairy Operations	Number of Respondents	Wage + Benefits
USDA Certified Producers - Domestic	17	\$58.39
USDA Certified Producers - Foreign	11	\$43.42
<i>USDA Organic Operations - All</i>	<b>28</b>	
USDA Certifying Agents Reporting Burden	Number of Respondents	Wage + Benefits
USDA U.S.-Based Certifiers	17	\$53.64
USDA Foreign-Based Certifiers	11	\$39.88
<i>Total USDA Certifiers - All</i>	<b>28</b>	
<b>All Respondents - Recordkeeping Burden</b>	<b>56</b>	

Total Reporting Hours	Total Reporting Costs
17.00	\$993
11.00	\$478
<b>28.00</b>	<b>\$1,470</b>

Total Reporting Hours	Total Reporting Costs
34.00	\$1,824
22.00	\$877
<b>56.00</b>	<b>\$2,701</b>
<b>84.00</b>	<b>\$4,171</b>

Total Recordkeeping Hours	Total Recordkeeping Costs
4.25	\$248
2.75	\$119
<b>7.00</b>	<b>\$368</b>

Total Recordkeeping Hours	Total Recordkeeping Costs
4.25	\$228
2.75	\$110
<b>7.00</b>	<b>\$338</b>
<b>14.00</b>	<b>\$705</b>

<b>Total Annual Costs</b>	<b>\$4,877</b>
---------------------------	----------------

## Respondents Sheet

<u>Type of Respondent</u>	<u>International or Domestic?</u>	<u>Number of Respondents</u>	<u>Date Data Accessed</u>
Producers	Domestic	17	
Producers	International	11	
Certifiers	Domestic	17	
Certifiers	International	11	

### **Instructions:**

Use this sheet to describe affected stakeholders and their associated wage rates.

- 1) Create a list of affected respondents (**Column B**).
- 2) Note if the respondent is international or domestic. (**Column C**)
- 3) Determine the number of respondents. (**Column D**)
- 4) Document the date data was accessed. (**Column E**)
- 5) Add link to source for number of respondents. (**Column F**)
- 6) Look up the BLS wage category and hourly wage rate on the Department of Labor data sheet. (**Columns G and H**) Include a link to the source for the wage rate. (**Column I**)
- 7) Calculate the wage + benefit, using the appropriate wage and benefits adjustments

### **Benefits and International Wage Adjustment:**

- A) Determine the adjustment for benefits (and international wage adjustment if needed) (**Cells L3 - N3**)
- B) International wage rates entered into **Column H** may need to be estimated based on a percentage of domestic wage rates.
- C) For example, you may reference a report that says that international wage rates are approximately 75% of domestic rates.

**D)** To use the international wage adjustment, use a formula in **Column H** to multiply the equivalent domestic wage rate by the international wage adjustment in cell **N3**.

<b><u>Source Link for Number of Respondents</u></b>	<b><u>BLS Wage Category</u></b>
	National Compensation Survey: Occupational Employment and Wage Estimates for 2022, published March 2023 by the Bureau of Labor Statistics. 11-9013 Farmers, Ranchers, and Other Agricultural Managers.
	Wages in foreign countries are benchmarked as 70.49% of U.S wages derived from World Bank estimates of Organization for Economic Co-Operation and Development (OECD) member countries in 2022
	National Compensation Survey: Occupational Employment and Wages for 2022, published March 2023 by the Bureau of Labor Statistics, Occupational Employment and Wages, 13-1041 Compliance Officers
	Wages in foreign countries are benchmarked as 70.49% of U.S wages derived from World Bank estimates of Organization for Economic Co-Operation and Development (OECD) member countries in 2022

<b>Hourly Wage</b>	<b>Source Link for Wage Rate</b>	<b>Wage+Benefits</b>
40.29	<a href="https://www.bls.gov/oes/cu">https://www.bls.gov/oes/cu</a>	58.3913043478261
28.400421	<a href="https://data.worldbank.org/">https://data.worldbank.org/</a>	43.4190811802477
37.01	<a href="https://www.bls.gov/oes/cu">https://www.bls.gov/oes/cu</a>	53.6376811594203
26.088349	<a href="https://data.worldbank.org/">https://data.worldbank.org/</a>	39.884343372573

# Benefits and International Wage Adjustment

## Benefit Adjustment - Domestic Rate

31.00%

Bureau of Labor Statistics News Release on Employer Costs for Employee Compensation, Benefits account for 31% of total average employer compensation costs, June 2022.  
[https://www.bls.gov/news.release/archives/ecec\\_09202022.pdf](https://www.bls.gov/news.release/archives/ecec_09202022.pdf)

<https://www.bls.gov/news.release/ecec.nr0.htm>

**Benefit Adjustment -  
International Rate**

34.59%

Benefit compensation rates at 34.59% of wage rates is based on an average of Organization for Economic Co-Operation and Development (OECD) benefits compensation rates. <https://stats.oecd.org/Index.aspx?DataSetCode=AWCOMP>.



**International Wage Adjustment**

70.49%

Wages in foreign countries are benchmarked as 70.49% of U.S wages derived from World Bank estimates of Organization for Economic Co-Operation and Development (OECD) member countries in 2022. <https://data.worldbank.org/indicator/NY.GDP.PCAP.PP.CD?locations=OE>. .

69.97%