

SUPPORTING STATEMENT
for PART A

OMB Control Number (0551-0015)

Title:

Sugar Imported for Export as Refined Sugar or as Sugar-Containing
Products or used in the Production of Certain Polyhydric Alcohols.

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2025 SUPPORTING STATEMENT

Sugar Imported for Export as Refined Sugar, as Sugar-Containing Products, or Used in the Production of Certain Polyhydric Alcohols

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This collection is an extension, without change, of a previously approved collection for which approval has expired. The regulation at 7 CFR 1530 authorizes the Foreign Agricultural Service (FAS) to issue import licenses to enter raw cane sugar exempt from the tariff-rate quota (TRQ) for raw cane sugar imports and related requirements on the condition that an equivalent quantity of refined sugar be: (1) exported as refined sugar; (2) exported as an ingredient in sugar-containing products; or (3) used in production of certain polyhydric alcohols. The information requirements set forth in the regulation are necessary to enable FAS to administer the licensing program in full compliance with the regulation and to ensure that licensed imports do not enter the commercial sugar market in circumvention of the TRQ for raw cane sugar. This regulation, which amended the previous regulation, became effective February 12, 1999. (Attachment 1)

Legal Authority: *Presidential Proclamation 6763 amended the Harmonized Tariff Schedule of the United States (HTS) to add Additional U.S. Note 6 to chapter 17 which states:*

Raw cane sugar classifiable in subheadings 1701.13.20 and 1701.14.20 shall be entered only to be used for the production (other than by distillation) of polyhydric alcohols, except polyhydric alcohols as a substitute for sugar in human food consumption, or to be refined and re-exported in refined form or in sugar-containing products, or to be substituted for domestically produced raw cane sugar that has been or will be exported. (See pages 2, 4, and 5 of Attachment 2.) The Secretary of Agriculture may issue licenses for such entries and may promulgate such regulations (including any terms, conditions, certifications, bonds, civil penalties, or other limitations) as appropriate to ensure that sugar entered under subheadings 1701.13.20 and 1701.14.20 is used only for such purposes. (See page 4 of Presidential Proclamation 6763 in Attachment 3.)

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 had made of the information received from the current collection.

The *Sugar Import Licensing Program* is intended to: (1) assist U.S. sugar manufacturers, refiners, and processors in making U.S. products price competitive on the world market and (2) facilitate the use of domestic refining capacity.

The *Refined Sugar Re-Export Program* is designed to facilitate use of domestic refining capacity to export refined sugar to the world market. The Program establishes licenses for sugar refiners, which may import raw sugar, refine it, and export it to the world market. The Program operates to mitigate the imposition of sugar import restrictions, which reduce the quantity of raw sugar allowed to enter the U.S. domestic market.

The *Sugar-Containing Products Re-Export Program* is designed to put U.S. manufacturers of sugar-containing products on a level playing field in the world market. U.S. participants in the sugar-containing products re-export program may buy world-priced sugar from any of the refiner participants or their agents for use in products to be exported into the world market.

The *Polyhydric Alcohol Program* functions to provide world-priced sugar to U.S. manufacturers of polyhydric alcohols. Participating U.S. manufacturers purchase world-priced sugar from licensed refiners or their agents for use in the production of polyhydric alcohols, except polyhydric alcohols substituting for sugar in human food consumption.

This information collection fulfills four inter-related functions: (1) it allows FAS to determine whether applicants for the Program meet the regulation's eligibility criteria; (2) the information permits FAS to monitor sugar imports, transfers, exports, and use to confirm that transactions are conducted and completed within the requirements of the regulation; (3) the information serves as a means to audit participants' compliance with the regulation; and (4) the information prevents world-priced sugar from entering the higher-priced domestic commercial sugar market. In general, licensees are regularly required to report specific information on sugar entries, transfers, transactions, sales, and use within specific time limits. The FAS Licensing Authority needs the information collected to manage, plan, evaluate, and account for Program activities.

Application: License applicants must submit information required under §1530.104 and §1530.110. With no mandatory application forms, interested applicants currently contact FAS via e-mail on sugars@usda.gov. Those companies granted licenses receive accounts on FAS' existing Sugars Users Group Accounting and Reporting System (SUGARS). By 2024, applicants will create an account on a new instrument called Sugar Unified Certification Review Oversight Statistics Evaluation (SUCROSE) system and submit required application materials through the website. Applications on company letterhead must contain the following information:

Refiner License

(1) Date of letter; (2) address of manufacturing facility(ies); (3) name and address of parent company and subsidiaries (if any); (4) statement that the applicant is not affiliated with an existing licensee; (5) kind and polarity of sugar to be used in the refining process; (6) schematic displaying the particulars of the refining process; (7) permission for the U.S. Department of Commerce's National Institute for Science and Technology to review the schematic (8) documents showing an import of raw cane sugar; (9) documents showing an export of refined sugar to at least one country; (10) names and documentation of any third-party exporters engaged by the applicant; (11) identity of a bonding agency or bank (if applicable) that will provide an optional bond or letter of credit in favor of the U.S. Government; (12) a prototype invoice for sales of Program sugar to manufacturers of sugar-containing products (SCP) and producers of polyhydric alcohol; (13) a prototype notice of transfer showing the applicant license number and the license number of the recipient (14) certification that the company will not request drawback from U.S. Customs and Border Protection for products exported under the Program.

Sugar-Containing Products (SCP) License

(1) Date of letter; (2) address of manufacturing facility(ies); (3) name and address of parent company and subsidiaries (if any); (4) statement that the applicant is not affiliated with an existing licensee; (5) identity of agent (if any) who will manage the license and letter of agreement between

the agent and applicant; (5) list of SCP items to be covered by the license and names of co-packers of such goods; (6) documents showing an export of sugar-containing products to at least one country; (7) names and documentation of any third-party exporters engaged by the applicant; (8) identity of a bonding agency or bank (if applicable) that will provide an optional bond or letter of credit in favor of the U.S. Government; (9) a sample invoice and notice of transfer from a licensed refiner.

Polyhydric Alcohol

(1) Date of letter; (2) address of manufacturing facility(ies); (3) name and address of parent company and subsidiaries (if any); (4) statement that the applicant is not affiliated with an existing licensee; (5) identity of agent (if any) who will manage the license and letter of agreement between the agent and applicant; (6) description and sugar percentage of products containing Program sugar; (7) kind of sugar to be used in the manufacturing process; (8) identity of a bonding agency or bank (if applicable) that will provide an optional bond or letter of credit in favor of the U.S. Government; (9) a sample invoice and notice of transfer from a licensed refiner.

Terms and conditions for obtaining a license: (1) ownership and/or operation of a facility(ies) in the United States, as required under §1530.103; (2) filing an application for a license, including a proposal for a documentation agreement, as required under §1530.104 and §1530.110. The Licensing Authority evaluates the proposal and once agreement is reached with the applicant, the applicant submits a notarized documentation agreement identifying documents to be maintained by the licensee to substantiate program activity and certify that charges and credits made pursuant to §1530.106 will be kept on file; (3) bonds posted under the previous regulation must be updated, as required under §1530.107. Letters of credit are an acceptable alternative to bonds. (4) no person may hold more than one license. Licenses are issued to: (1) refiners to import raw sugar and transfer or export refined sugar and (2) manufacturers and producers to receive transfers from refiners and export sugar-containing products or produce polyhydric alcohols. All Program participants must maintain information required by the regulation. The licensee shall keep the documentation established in the documentation agreement for five years from the date of such Program transaction and maintain the supporting documentation for each transaction for uploading in SUCROSE upon request.

Submission of regular reports regarding licensing activity as required under §1530.109:

Reports are submitted on exports, imports, transfers, or license use (charges and credits against license balances). A licensee may submit reports as often as monthly for charges and credit against a license balance. At minimum, a licensee must submit at least a quarterly report not later than 90 days after the earliest transaction (unless there have been no transactions). Licensees are to update data as necessary to maintain accurate information in previously submitted reports.

Each report must include the following for all Program transactions:

- (1) A unique number, assigned by the licensee, for the transaction; (2) date of the entry, transfer (only a refiner reports transfers to the Licensing Authority), export, or use; (3) quantity of sugar transferred or exported as refined sugar, or used in the production of certain polyhydric alcohols; (4) the licensee's number or if a transfer is being reported, the licensee's number as well as the transfer recipient's license number; (5) country of origin (entry of raw sugar) or final destination (refined exports), using the country code designated in the HTS.

Submission of information pertaining to bonds and/or letters of credit as required under §1530.107:

The licensee may charge Program sugar in anticipation of transfer, export, or production, if the licensee has established a performance bond or a letter of credit (L/C) with USDA which meets the following criteria: (1) A bond or L/C may cover entries made during the time period stated in a bond. (2) The obligation under bond or L/C shall be effective no later than the date of entry or date of transfer. (3) The amount of bond or L/C shall be equal to 20 cents/pound of sugar to be entered. (4) If the licensee fails to credit a license within the given time period, a specified payment shall be made to the U.S. Treasury.

PRACTICAL UTILITY OF THIS COLLECTION IN DETERMINING COMPLIANCE WITH THE PROGRAM

To set the stage for this discussion, it may be instructive to review elements of U.S. sugar policy. The United States limits imports of raw and refined sugar through tariff-rate quotas.

This situation poses a challenge to U.S. exporters of sugar and sugar-containing products, which must compete with less expensive foreign products. To address this price discrepancy, the Program was developed to provide U.S. exporters with access to world-priced sugar, thereby making them more competitive in international markets.

The information collection serves to verify that imported world-priced sugar is actually exported and not diverted onto the domestic market, thereby undermining the objectives of U.S. sugar policies. This collection enables USDA to monitor participants in an effort to ensure compliance with Program parameters.

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

Integrated Database: Beginning in 2024, a web-based software system called the Sugar Unified Certification Review Oversight Statistics Evaluation (SUCROSE) will replace the previous system for the sugar re-export program which was introduced in 2004: the Sugars Users Group Accounting and Reporting System (SUGARS) (<http://www.fas.usda.gov/sugars/fassugarshome.aspx>); FAS anticipates 100 percent of respondents will submit responses using the web-based system. FAS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections. SUCROSE is being implemented to streamline licensees' submission of required reporting data and for the first time will allow licensees to view automatically updated information on their license balances without requiring an e-mail to ask FAS to provide such data. Approved under this request, SUCROSE will permit licensees to submit requests for waivers on overdue transaction entries, to provide updated bond information, to grant access to multiple users to their company license profile, and to provide updated company information to FAS. SUCROSE will also allow new participants to apply for licenses through the system, which streamlines the application process and allows FAS to efficiently grant new licensees access to SUCROSE's license management features upon issuing a license.

Objectives of the Electronic Program:

1. Unlike SUGARS, SUCROSE will operate as an integrated instrument capable of monitoring compliance with the regulation and serving as a platform for new license applications.
2. The SUCROSE system will provide more efficient reporting options for Program participants by allowing licensees to upload data at their convenience and see automatic updates to their license balance information (similar to an on-line checking account). To improve FAS' audit, monitoring, and enforcement capabilities, FAS will add a compliance feature in SUCROSE. The system will have the capability for a licensee to upload documents upon request by FAS.
3. The SUCROSE software will link data for manufacturers of sugar-containing products, companies making inedible polyhydric alcohol, and sugar refiners. The developing on-line system will offer automatic feedback to users about their Program balances following a submission. SUCROSE will reduce the burden on FAS staff to manually verify each submission by relying on coded compliance checks before accepting transactions; participants will also save time by not having to e-mail FAS to know their Program status to make more informed and timely decisions about purchases of Program sugar from licensed refiners.
4. Under SUGARS, managing the refined sugar re-export licensing Program no longer requires a program assistant and an import control specialist. SUCROSE will move in the same direction. By reducing human error, the SUCROSE database will notify FAS staff and participants when a licensee/participant has exceeded their bonded or license limit. SUCROSE will eliminate the need for FAS staff to undertake complex mathematical cross-checking to determine if a licensee is out of compliance with their license balance and then notify the participant via e-mail. SUCROSE will stop participants from inadvertently submitting transactions which put their license out of compliance and will instruct them on steps needed to remain in compliance, thereby improving FAS' enforcement and compliance abilities.
5. A new feature in SUCROSE will allow participants to submit waivers to the FAS Licensing Authority for overdue transaction data. Waiver submissions handled through SUCROSE will reduce the burden for the participant and FAS staff. Instead of handling the request via e-mail, FAS staff will more easily examine a waiver request in the system and will review the information provided and how it will impact their license balance. The streamlined review process under SUCROSE will allow FAS to review and accept or reject these requests and will provide an automated process for a participant to update their reporting information with FAS to stay in compliance.
6. The system will prevent participants from entering export data for destinations not approved in their documentation agreements. This measure will require companies to first modify their documentation agreements to secure additional export destinations.
7. Sugar-containing product manufacturer participants are required to update their product lists, usually once per year, to validate which exported products are claimed under the Program. SUCROSE will provide these participants an easy way to update their product lists in the system and will save time in future years by quickly adding or removing products exported under the Program.

8. SUCROSE will allow refiner and sugar-containing product licensees using third-party exporters, as negotiated with FAS in their documentation contractual agreements, to provide FAS updated information in a streamlined manner (instead of over e-mail) on their third-party exporters. Participants will indicate when they claim third-export transactions on their license. The SUGARS system does not provide an option for tracking third-party exporters and their exports, which adds significant burden on FAS staff's time required to audit this information through the records of participants. Lack of capability to identify third-party exports creates incentive for fraud. SUCROSE will greatly enhance FAS' staff ability to record and audit this information over time to ensure participants stay in compliance with the Sugar Re-Export Program regulation and the associated waiver concerning third-party exporters.

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

Every effort has been made to avoid duplication. The information collection does not duplicate information or data available elsewhere; there is no similar data collection available. To ensure integrity, FAS solely administers the data required by Participants who submits data into SUCROSE and enters business with FAS in accordance with contract specifications and cannot be obtained from any other source other than the Participants

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The method used to obtain information has been minimized to ensure all respondents, including small businesses, will not be burdened. The agency estimates 35 percent of participants qualify as small businesses.

6. Describe the consequence 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.

This is a mandatory, on-going information collection request. The regulation stipulates the frequency of data collection and reporting. Less frequent reporting or no reporting would prevent the integrity of the administration of the refined sugar re-export licensing Program.

7. Explain any special circumstance that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly:**

Under Section 1530.105: (1) Refiners have 90 days to export or transfer an equivalent amount of sugar if entry results in a positive license balance, (2) manufacturers and producers have 18 months to export or use an equivalent amount of sugar charged against a license. (3) Licensees have 90 days to report transactions. The 90-day reporting requirement is necessary to maintain timely information on license balances.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:**

Not applicable.

- **requiring respondents to submit more than an original and two copies of any document:**

Not applicable.

- **requiring respondents to retain records, other than health, medical or government contract, grant-in-aid, or tax records for more than three years:**

Under Section 1530.110(c): Licensees are to maintain the documentation established in the documentation agreement for five years from the date of each Program transaction. Past investigations regarding the sugar re-export licensing Program have revealed that the Office of the Inspector General needs five years of data to substantiate compliance or non-compliance with the Program. SUCROSE will provide licensees the capability to upload supporting documents for their transactions to allow FAS to adequately enforce compliance with the re-export program regulation, 7 CFR 1530.

- **in connection with a survey that is not designed to produce valid and reliable results that can be generalized to the universe of the study:**

Not applicable.

- **requiring the use of statistical data classification that has not been reviewed and approved by OMB:**

Not applicable.

- **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**

Not applicable. FOIA rules govern this material.

- **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.**

FOIA rules govern this material. There are no other special circumstances. This information is handled in a manner consistent with guidelines established in 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received

in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

FAS published a 60-day Notice of Proposed Information Collections for public comments in the Federal Register, Volume 87; Page 65187 on October 28, 2022. The public was given until December 27, 2022, to submit comments on the proposed information collection. No comments were received.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Consultations with the following individuals were made regarding this collection. The individuals concurred that the FAS estimates for the burden hours for the collection were reasonable.

Company	Contact	E-mail	Phone Number
Eastman Chemical Company	Teresa D. Tipton	tdtipton@eastman.com	(423) 229-5060
Cargill Cocoa and Chocolate North America	Trey O'Bryan	Trey_OBryan@Cargill.com	(952) 742-0748
Rise Baking Company	Clint Jackson	c.jackson@risebakingcompany.com	(801) 644-0108
Calico Cottage, Inc.	Christa Ehlers	christa.ehlers@calicocottage.com	(631) 841-2100
KAV America AG, Inc.	Rebecca Nam	rebecca.nam@kavamerica.com	(951) 249-7772
Nutkao USA, Inc.	Julie Kainec	j.kainec@nutkao.com	(252) 908-5095
California Sugar Refiners, LLC	Jennifer Tamez	jtamez@zucarmex.com	(619) 934-1057
Monin Gourmet Flavorings	Rodrigo Magan	rmagan@monin.com	(727) 467-1229

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

Respondents do not receive any payment or gifts for participation in the Program.

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

No additional assurance of confidentiality is provided with this information collection. Any and all information obtained in this collection shall not be disclosed except in accordance with 5 U.S.C.552a. This request complies with the Privacy Act 1974.

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. 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.

The information requested under the regulation is not of a sensitive nature. This request complies with the Privacy Act 1974.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **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 83–1.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contraction out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Activity	No. of Respondents	Frequency of Responses	Total Annual Responses (A*B)	Average Hours per Respondent	Total Annual Burden Hours	*Hourly Costs	Annual Costs
Applications	1	1	1	20	20	\$76.21	\$1,524
Reporting	129	8.3	1,071	0.21	224.91	\$76.21	\$17,139
Recordkeeping	129	1	129	0.07	9.03	\$76.21	\$688
Bonds	15	1	15	1	15	\$76.21	\$1,143
Waivers (Exemptions)	27	1	27	1.5	40.5	\$76.21	\$3,086
TOTAL	301	Varies	1,243	Varies	309	\$76.21	\$23,581
Total Annual Responses =1,243 and 309 hours							

*(both include Recordkeeping and Fringe Benefits		
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*Based on data from the Bureau of Labor Statistics for Administrative Services and Facilities Managers provided a reasonable estimate of \$76.21 per hour (which includes fringe benefits of 30%) per hour has been used as the average cost for respondents' program participation. The total annual estimated burden in dollars for FY25 is \$23,581.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of the methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include among other items, preparations for collection information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Activity	No. of Respondents	Frequency of Responses	Total Annual Responses (A*B)	Average Hours per Respondent	Total Annual Burden Hours	**Hourly Rate	Fed Gov. Annual Costs
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Applications	1	1	1	20	20	\$90.77	\$1,815
Reporting	129	8.3	1,071	0.21	225	\$89.04	\$20,035
Recordkeeping	129	1	129	0.07	9	\$89.04	\$801
Bonds	15	1	15	1	15	\$89.04	\$1,336
Waivers	27	1	27	1.5	41	\$89.04	\$3,651
Inquiries about re-export Program	varies	varies	varies	varies	30	\$89.04	\$2,671
Time devoted to developing SUCROSE	varies	varies	varies	varies	200	\$89.04	\$17,809
TOTAL	301		1,243		540		\$48,118

**Government officials are responsible for administering the regulation. Their annual salary with 30 percent fringe benefits (based on FY 2024 GS-13/step 5) and estimated percentage of work hours devoted to the program result in an estimated FY 2025 cost of \$48,118.

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

This collection is an extension, without change, of a previously approved collection for which approval has expired. SUCROSE has streamline several processes which result in a reduction in activity. FAS reached out to several participants to solicit feedback on burden estimates. Based on feedback, the agency reduced the total annual responses from 1,486 to 1,243, a decrease of 243 responses. The annual burden hours decreased from 428 to 309 resulting in a decrease of 119 burden hours.

FAS also reduced the number of respondents from 333 to 301 as licensees who haven't reported for three or more years have had their access deactivated.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This collection of information will not be published.

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.

There are no forms in this collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83–1.

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection of data does not employ statistical methods.