SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Federal Fish and Wildlife Permit Applications and Reports – Requirements for African Elephants OMB Control Number 1018-0186

Terms of Clearance: None.

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

Information collection requirements contained in permit applications are specifically provided for in 50 CFR 13, 17, and 23.

All laws, treaties, and regulations administered by the Service that authorize activities requiring a permit provide that authority through the general permit provisions in 50 CFR part 13. The requirements in 50 CFR Part 13 are in addition to any other permit regulations that may apply to a specific circumstance and are outlined in other sections of regulation.

When a species is listed as threatened, section 4(d) of the Endangered Species Act of 1973, as amended (ESA; 16 U.S.C. 1531 et seq.), gives discretion to the Secretary of the Interior (Secretary) to issue regulations that the Secretary deems necessary and advisable to provide for the conservation of such species. Considering the rise in international trade of live elephants, particularly of wild-sourced elephants, and recent CITES developments concerning regulation of trade in live elephants, as well as a need to clarify our enhancement standards and improve the permitting process for import of sport-hunted elephant trophies, we reevaluated the provisions of the regulations that were issued under section 4(d) of the ESA for the African elephant. We find it is appropriate for the United States to adopt requirements under the ESA to ensure that activities with live African elephants under U.S. jurisdiction contribute to enhancing the conservation of the species and that live African elephants are well cared for, so that any domestic demand for live African elephants enhances the conservation of the species and does not contribute to the decline of the species in the wild.

In addition, clarifying the enhancement requirement for the import of African elephant sport-hunted trophies and receiving information from the range countries enables us to ensure that authorized imports contribute to enhancing the conservation of the species and do not contribute to the decline of the species. Clarifying the enhancement standards in the decision-making process for the import of African elephant sport-hunted trophies increased transparency with stakeholders. To support U.S. African elephant conservation efforts, we allow certain types of imports only from countries that have achieved a Category One designation under the CITES National Legislation Project, which is accomplished by meeting the basic requirements to implement CITES through the Party's adoption of national laws to implement the treaty.

On April 1, 2024, our final rule (89 FR 22522) revised section 4(d) rule (in part 17 of title 50 of the Code of Federal Regulations at 50 CFR 17.40(e)) by adopting measures that were necessary and advisable for the current conservation needs of the species, based on our evaluation of the current threats to the African elephant. This final section 4(d) rule removed from 50 CFR 17.40(e)(2) the exception from prohibitions for import, export, interstate commerce, and foreign commerce in live African elephants, except when a permit can be issued under 50 CFR part 17. The final rule also established the standards used to evaluate

"enhancement" under the ESA for the import of wild-sourced live African elephants under a new 50 CFR 17.40(e)(10). This provision established an annual certification requirement for range countries that allow for export of live African elephants destined for the United States to provide the Service with information about the management and status of African elephants in their country.

This final rule also clarified our evaluation of the existing enhancement requirement regarding applications for the import of sport-hunted trophies by adding a new provision to 50 CFR 17.40(e)(6). This provision established an annual certification requirement for range countries that allow for export of sport-hunted trophies destined for the United States to provide the Service with information about the management and status of African elephants and the hunting programs in their country. This provision did not change the enhancement requirement for the import of sport-hunted trophies under the previous section 4(d) rule but clarified how that requirement can be met.

The final rule also incorporated the CITES National Legislation Project category designations (see 50 CFR 23.7 and https://www.cites.org) into the acceptance of imports under 50 CFR 17.40(e)(2), (e)(6), and (e)(10) under a new 50 CFR 17.40(e)(11).

Before a country can issue an export permit for CITES Appendix I or II specimens, the CITES Scientific Authority of the exporting country must determine that the export will not be detrimental to the species, and the Management Authority must be satisfied that the specimens were acquired legally. For the export of Appendix III specimens, the Management Authority must be satisfied that the specimens were acquired legally (CITES does not require findings from the Scientific Authority). Prior to the importation of Appendix I specimens, both the scientific and Management Authorities of the importing country must make required findings. The Scientific Authority must also monitor trade of all species to ensure that the level of trade is sustainable. Article VIII(3) of the CITES treaty states that participating parties should make efforts to ensure that CITES specimens are traded with a minimum of delay. Section XII of Resolution Conf. 12.3 (Rev. CoP18) recommends use of simplified procedures for issuing CITES documents to expedite trade that will have no impact, or a negligible impact, on conservation of the species involved.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The information that we collect on applications and reports is the minimum necessary for us to determine if the applicant meets/continues to meet issuance requirements for the particular activity. Respondents submit application forms periodically as needed; submission of reports is generally on an annual basis, or as identified conditionally as part of an issued permit. We examined applications in this collection, focusing on questions frequently misinterpreted or not addressed by applicants. We have made clarifications to many of our applications to make it easier for the applicant to know what information we need and to accommodate future electronic permitting. Use of these forms:

- Reduces burden on applicants.
- Improves customer service.
- Allows us to process applications and finalize reviews quickly.

APPLICATIONS – Respondents submit application forms periodically, as necessary. All

Service permit applications use forms in the 3-200 series, with each form tailored to a specific activity and its corresponding permitting requirements.

Standardizing general information common to the application forms makes filing of applications easier for the public as well as expedites our review of applications. In accordance with Federal regulations at 5 CFR 13.12, we collect standard identifier information for all permits, such as:

- Applicant's full name and address (street address, city, county, state, and zip code; and mailing address if different from street address); home and work telephone numbers; and, if available, a fax number and e-mail address, and;
    - If the applicant resides or is located outside the United States, an address in the United States, and, if conducting commercial activities, the name and address of his or her agent that is located in the United States; and
    - If the applicant is an individual, the date of birth, occupation, and any business, agency, organizational, or institutional affiliation associated with the wildlife or plants to be covered by the license or permit; or
    - If the applicant is a business, corporation, public agency, or institution, the tax identification number; description of the business type, corporation, agency, or institution; and the name and title of the person responsible for the permit (such as president, principal officer, or director);
- Location where the requested permitted activity is to occur or be conducted;
- Reference to the part(s) and section(s) of subchapter B as listed in paragraph (b) of 50 CFR 13 under which the application is made for a permit or permits, together with any additional justification, including supporting documentation as required by the referenced part(s) and section(s);
- If the requested permitted activity involves the import or re-export of wildlife or plants from or to any foreign country, and the country of origin, or the country of export or re-export restricts the taking, possession, transportation, exportation, or sale of wildlife or plants, documentation as indicated in § 14.52(c) of subchapter B;
- Certification containing the following language:
    - *I hereby certify that I have read and am familiar with the regulations contained in title 50, part 13, of the Code of Federal Regulations and the other applicable parts in subchapter B of chapter I of title 50, Code of Federal Regulations , and I further certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to suspension or revocation of this permit and to the criminal penalties of 18 U.S.C. 1001.*
- Desired effective date of permit except where issuance date is fixed by the part under which the permit is issued;
- Date;
- Signature of the applicant; and
- Such other information as the Director determines relevant to the processing of the application, including, but not limited to, information on the environmental effects of the activity consistent with 40 CFR 1506.5 and Departmental procedures at 516 DM 6, Appendix 1.3A.

Permit Application (Form 3-200-37h), "*Interstate Commerce, Transfer, Export, or Foreign Commerce of Live African Elephants under the U.S. Endangered Species Act (ESA)*" 50 CFR 17.40 – Form 3-200-37h will cover activities involving the interstate commerce, transfer, export, or foreign commerce of live African elephants. The application form applies to both wild-sourced and captive-born African elephants. We will use the information provided in the application form to determine whether a permit can be issued to the applicant under the relevant

Federal regulations pertaining to the requested activity.

We will develop this application form in the Service's ePermits system to reduce public burden. Upon request, we will provide the public with paper-based (or PDF) versions if they do not have reliable access to the Internet.

Information to be collected from domestic entities (i.e., individuals, private sector, State/local/Tribal governments) is listed below, noting applicants may need to provide information from the foreign entity as part of their application submission:

- Standardized identifier information required in 5 CFR 13.12.
- Name and address where the permit is to be mailed, if different from physical address.
- Name, phone number, and e-mail of individual(s) for the Service to contact with questions.
- Whether the applicant or any of the owners of the business (if applying as a business, corporation, or institution) have been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws.
- Type of activity requested (interstate commerce, transfer, export, or foreign commerce).
- The current location of the animal(s) (if different from the physical address).
- Name and physical address of the recipient of the specimen.
- For each animal involved in the export/transport, the applicant must provide the following information:
    - Scientific name (genus, species, and if applicable, subspecies);
    - Common name;
    - Approximate birth date (mm/dd/yyyy);
    - Wild or captive-born;
    - Quantity;
    - Sex (males, females, e.g., 10.2); and
    - Permanent markings or identification (microchip #, leg band #, tattoos, studbook #, etc.).
- Information regarding source of specimen(s);
- A description and justification for the requested activity;
- Information regarding technical expertise and facilities;
- Information confirming the receiving facility meets the CITES "appropriate and acceptable destination"; and
- The transportation/shipment condition of the live animals.

(1) *Recordkeeping Requirements* – Completion of Form 3-200-37h requires the retention of records regarding details on the identification of the elephants, as well as regarding its acquisition, original source, and subsequent transfers, as well as records documenting staff technical expertise and facility information for the species.
(2) *Permit Fee* – Form 3-200-37g will imposes a nonhour burden cost of $100 per application. Amendments will incur a $50 processing fee.

Range Country Certification Requirements – The regulations also established an annual certification requirement for range countries to provide the Service with information about the management and status of African elephants and their habitat, within their country. This is not part of the application form itself, but a separate certification document/report/letter from the

foreign country's government. The foreign government may provide the certification and information directly to the Service, or the applicant may provide it to the Service. The certification and information would be subject to verification by the Service.

This annual certification from the range country will be kept on file and made available to the public. Without this properly documented and verifiable annual certification, the Service would be unable to issue the requested import permit. This annual certification is specifically for requests to import live, wild-sourced African elephants or African elephant sport-hunted trophies.

Information to be collected from the range country for the import of live, wild-sourced elephants includes specific information on whether family units were kept intact and whether any of the animals collected are pregnant. Alternatively, information collected for the import of sport-hunted trophies includes specific information on the use of the meat of the animal.

PROPOSED REVISIONS: With this submission, based on feedback from our targeted outreach to nine individuals (the maximum allowed limit) familiar with this collection, we propose the following revisions to Form 3-200-37g to clarify requested information, improve clarity and sustainability, and to reduce burden:

(1) Remove the duplicative request for the mailing address from Part I, question 1, while retaining the expedited shipping instructions;
(2) Clarify question 2 so that the applicant identifies the application-specific contact, if it differs from the institution's primary contact;
(3) Remove duplicative funding language from question 29 and retain Question 30 as the separate funding question;
(4) Revise question 19 to clarify the information requested concerning anticipated effects of a proposed transfer on elephants currently housed at the facility and any resulting planned transfers; and
(5) Correct the identified typographical errors and the link to the list of designated ports.

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 and specifically how this collection meets GPEA requirements.

Forms in this collection will be available in a fillable format on our forms and permits websites, by mail, or by e-mail. Applicants may complete the application online but must send the application form with an original signature and the processing fee to the Service by mail. Applicants may send us any supporting documentation or information missing from the application, other than original signature, via electronic mail.

We will develop Form 3-200-37h in the Service's automated permit application system, referred to as "ePermits." The ePermits system allows the agency to streamline the permitting process to reduce the information collection burden on the public, particularly small businesses. Public burden reduction is a priority for the Service; the Assistant Secretary for Fish, Wildlife, and Parks; and senior leadership at the Department of the Interior. The ePermits System automates the permitting process to improve the customer experience and to reduce time burden on respondents. This system enhances the user experience by allowing users to enter data from any device that has Internet access, including personal computers,

tablets, and smartphones. It also links the permit applicant to the Pay.gov system for payment of the associated permit application fee.

Users of the ePermits system must register for an account which then automatically populates the forms they complete with the required identification information, thus preventing the need for them to enter the data multiple times when they apply for separate permits and reducing burden on the applicant. The account registration process also provides private sector users an opportunity to self-identify as a small business which will enable the Service to more accurately report burden associated with information collection requirements placed on them.

The ePermits system reduces the amount of time necessary for an applicant to apply for a permit and perform regular actions related to that permit (e.g., amend, renew, report). Through the ePermits account registration, we will track and be able to report the numbers of small business applicants more accurately, along with the type of business (for-profit, farm, not-for profit). This information allows the Service to be more responsive in identifying the possibility of additional burden reduction on small businesses.

We plan to eliminate the necessity for physical mail-in applications (though this will remain an option for those who either don't have access to the internet or prefer to use mail-in applications), thus further reducing the burden on the public as well. With ePermits, an applicant is able to establish an account, apply for multiple permits through a single interface, and track all their applications, permits and permit-related actions as well as all communications between Service staff and the permittee/applicant within the same interface, significantly reducing the burden on the government to process these applications and manage permit-related actions.

The Service anticipates the discontinuance of most paper-based versions due to the ePermits system. The elimination of most paper-based forms reduces the government cost of administering and processing permit applications. However, PDF copies of any form will be provided to any applicant, upon request, if they are unable to connect to the ePermits system.

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.

The information that we collect is unique to the applicant and is not available from any other source. By tailoring application forms to particular activities, we eliminate duplication, provide better customer service, and improve our ability to process applications.

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

The use of these application forms minimizes the burden on the public. Generally, a permit applicant is responsible for providing us with sufficient information to make the required findings prior to issuing a permit. We can issue required findings either on an application- by-application basis or a programmatic basis.

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.

If we do not collect the information, we will be unable to issue required permits for import,

export, take, and interstate/foreign commerce. While we could issue documents without using the proposed application forms, the burden would be greater on applicants because we would have to collect the information on a permit-by-permit basis.

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

- *** 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;**
- *** 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 three 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 secrets, 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.**

There are no special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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 three 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.

On June 8, 2026, we published in the *Federal Register* (91 FR 34639) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on August 7, 2026. We also published the *Federal Register* notice on Regulations.gov (Docket No. FWS-HQ-IA-2026-1948). We received the following six

comments in response to that notice:

Comment 1: Electronic comment received from Victoria Lopez submitted via Regulations.gov (FWS-HQ-IA-2026-1948-0003) on August 3, 2026. The commenter requests that the Service stop allowing the import of African elephants into the United States and stop authorizing the killing of elephants for trophies. The commenter expresses broader opposition to elephant hunting and trophy imports and raises concerns about threats to African elephant populations. The commenter also cites information regarding elephant populations and trophy hunting in Botswana and other African countries and urges the Service to provide greater protection for elephants and deny permits for the import of elephant trophies.

> ***Agency Response to Comment 1:*** The Service appreciates the commenter's concern for the conservation of African elephants. However, the comments regarding whether African elephants should be hunted, whether elephant hunting should be permitted in range countries, and whether the Service should issue permits for the import of elephant specimens are outside the scope of this information collection renewal. The commenter did not address the information collection requirements; therefore, no response is required.

Comment 2: Anonymous electronic comment submitted via Regulations.gov [FWS-HQ-IA-2026-1948-0004] on August 5, 2026. The commenter states that they are unclear about the changes regarding elephant trophies and generally support sport hunting when conducted within biological limits established by range countries. The commenter opposes unnecessary burdens on hunting and indicates they take no position otherwise. The commenter also states that the action appears to primarily concern live elephants and expresses support for the Service's judgment.

> ***Agency Response to Comment 2:*** We appreciate the commenters support regarding the import of African elephant specimens and feel there are no unnecessary burdens on hunting. Therefore, the Service is taking no action in response to the comment.

Comment 3: Anonymous electronic comment submitted via Regulations.gov [FWS-HQ-IA-2026-1948-0005] on August 7, 2026. The commenter recommends prohibiting the import and export of wildlife for hunting purposes and expresses concerns about climate change and the impacts of hunting on threatened species, including elephants.

> ***Agency Response to Comment 3:*** This renewal does not propose changes to the African elephant 4(d) rule, the conservation status of African elephants, or the Service's substantive standards for authorizing the import of African elephant specimens. The commenter did not address the information collection requirements; therefore, no response is required.

Comment 4: Anonymous electronic comment submitted via Regulations.gov [FWS-HQ-IA-2026-1948-0006] on August 7, 2026. The commenter asserts that the information collection does not have sufficient practical utility under the Paperwork Reduction Act because Form 3-200-37 may provide self-certified information concerning conservation benefits, population status, and facility suitability. The commenter recommends requiring third-party financial audits and peer-reviewed biological population data before OMB approves the information collection.

Agency Response to Comment 4: The Service considers the information collected through Form 3-200-37 necessary and to have practical utility in administering the existing requirements. Therefore, the Service is taking no action in response to the comment.

Comment 5: Electronic comment received from Allyson Koop, volunteer with Animal Counsel, submitted via Regulations.gov [FWS-HQ-IA-2026-1948-0007] on August 7, 2026. The commenter supports the existing information collection and recognizes its utility in evaluating applications. The commenter recommends requiring applicants to provide additional corroboration of proposed activities, such as a letter of reference, facility photographs, or a detailed care plan, to help the Service assess an applicant's ability to properly care for an African elephant. The commenter also supports electronic applications as a means of reducing applicant burden.

Agency Response to Comment 5: The Service appreciates the commenter's support for the form and electronic application process. Their recommendation to require additional information modifying the current requirements would require a separate regulatory action is currently outside the scope of this renewal request. However, the Service will take the recommendation under consideration should we pursue any additional regulatory actions regarding the requirements for African elephants.

Comment 6: Electronic comment received from W. Laird Hamberlin, President, Safari Club International, submitted via Regulations.gov [FWS-HQ-IA-2026-1948-0008] on August 7, 2026. The commenter asserts that the 2024 African elephant 4(d) rule including its annual certification for African elephant range countries is unnecessary, duplicative, and overly burdensome, and recommends its elimination or amendment and that CITES requirements are sufficient.

Agency Response to Comment 6: This renewal does not propose changes to the African elephant 4(d) rule, the conservation status of African elephants, or the Service's substantive standards for authorizing the import of African elephant specimens. Although the certification is part of the information collection, eliminating or modifying the requirement would require a separate regulatory action. The Service will take the recommendation under consideration should we pursue any additional regulatory actions regarding the requirements for African elephants.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Organization	**Title**
Memphis Zoo	Registrar
Dallas Zoo Management, Inc.	Registrar
Six Flags Great Adventure Safari Park	Park President
Reid Park Zoological Society	Zookeeper
Wildlife Safari	General Curator
Lowry Park Zoological Society	Animal Registrar
Virginia Zoological Park	Registrar
Zoological Society of San Diego	Wildlife Registrar

"***Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary"***

Comments*:* A commenter generally supported the collection but questioned whether certain information requested on Form 3-200-37h remains necessary or is duplicative. The commenter identified potential duplication between information requested elsewhere on the form and information entered through ePermits and specifically questioned Parts I, questions 1 and 2; questions 6, 7, 8(c), 11(d)(ii) and (iii), 11(e), 19, 25, and 29.

Agency Response/Action Taken*:* The Service determined that the collection remains necessary and has practical utility for evaluating applications and determining whether applicable permit requirements are met. The Service agrees that the mailing address is also collected in Part C and will remove the duplicative request from Part I, question 1. The Service will retain the expedited shipping instructions in Part I so applicants have the necessary information for requesting expedited delivery. The Service made a clarification to Part I, question 2 so it is clear that the applicant identify the application-specific contact, if it differs from the institution's primary contact. The Service will retain questions 8(c) and 11(d)(ii) and (iii), as the comment did not establish that these questions are unnecessary or duplicative. The Service will revise question 19 to clarify the information requested regarding effects of a proposed transfer on elephants currently at the facility and any resulting planned transfers. The Service will also remove duplicative funding language from question 29. The availability of ePermits does not eliminate the need for the collection of information necessary to evaluate an application.

"The accuracy of our estimate of the burden for this collection of information"

Comments*:* A commenter did not identify a specific error in the Service's estimate of the burden associated with Form 3-200-37h. The commenter stated that electronic submission through ePermits is likely less burdensome and identified several potential redundancies that could affect the time required to complete the form.

Agency Response/Action Taken*:* The Service determined that no change to the burden estimate is warranted based on this comment. The commenter did not provide information demonstrating that the Service's burden estimates are inaccurate. The Service's estimates distinguish between the hardcopy and ePermits applications and reflect a lower estimated completion time for the ePermits application. The Service will continue to consider opportunities to reduce respondent burden through clarification and elimination of unnecessary duplication.

"Ways to enhance the quality, utility, and clarity of the information to be collected"

Comments*:* A commenter recommended clarifying question 19; eliminating duplicate funding language in questions 29 and 30; reconsidering the use of "leg band #" in questions 6 and 7; revising the presentation of quantity, sex, and individual identification information in question 6; clarifying questions 11(d)(ii) and (iii); addressing the historical wild-born elephant situation in question 8(c); and correcting typographical errors and a broken link.

Agency Response/Action Taken*:* The Service will make targeted revisions to

improve clarity and usability. The Service will revise question 19 to clarify the information requested concerning anticipated effects of a proposed transfer on elephants currently housed at the facility and any resulting planned transfers. The Service will remove the duplicate funding language from question 29 and retain question 30 as the separate funding question. The Service has corrected the identified typographical errors and the link to the list of designated ports. The Service will retain the existing animal identification, quantity, and sex information because these are distinct information elements used to identify and evaluate the animals included in an application. The Service will retain questions 11(d)(ii) and (iii) because they request related but distinct genetic management information. The Service will also retain question 8(c) because the comment did not establish that the existing question cannot adequately capture the applicable source information; the Service will not add a new historical category based solely on the comment.

And

"Ways to minimize the burden of the collection of information on respondents"

Comments*:* The commenter recommended minimizing burden by eliminating information considered duplicative, including information entered through ePermits; simplifying the manner in which animal information is entered; eliminating duplicate questions; and relying more extensively on information already maintained by the Service or an applicant's ePermits account.

Agency Response/Action Taken*:* The Service will reduce burden by removing duplicative funding language from question 29 and clarifying question 19. The Service will continue to make ePermits available as an electronic submission option and recognizes that the ePermits application has a lower estimated completion time than the hardcopy application. The Service will retain the hardcopy application because it remains an available submission method and must contain the information necessary for the Service to evaluate an application. The Service will retain the existing animal quantity, sex, and identification requirements because these are separate information elements necessary for permit evaluation. The Service did not identify a basis for eliminating these requirements based on the comment.

Of the individuals contacted as part of the outreach, several did not provide feedback. Each nonrespondent was contacted by email on at least two occasions to provide an opportunity to participate and provide input on the information collection. No additional responses were received following the follow-up outreach. The Service considers these follow-up efforts sufficient to provide nonrespondents a reasonable opportunity to provide feedback and to minimize the potential for nonresponse bias.

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

We do not provide gifts or payment to respondents.

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

The information that we collect from applicants is part of an existing Privacy Act System of

Records FWS-21, Permits System (September 4, 2003, 68 FR 52610; modifications published on June 4, 2008, 73 FR 31877, and on March 16, 2023, 88 FR 16277) and is subject to the requirements of both the Privacy Act of 1974 and the Freedom of Information Act (FOIA).

For organizations, businesses, or individuals operating as a business (i.e., permittees not covered by the Privacy Act), we request that applicants identify any information that they wish us to consider privileged and confidential business information. We will determine if the information meets the FOIA criteria that will allow us to withhold it from the public. The non-confidential information may be made available to the public under FOIA [43 CFR 2.13(c)(4), 43 CFR 2.15(d)(1)(i)].

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.

We do not ask questions of a sensitive nature.

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.**
- **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 contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that we will receive **87 responses** totaling **619 burden hours** (see Attachment A). We estimate the annual dollar value of the burden hours is **$13,451** (rounded). See Attachment A for a breakdown of burden hours and hourly burden costs for each information collection.

We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release USDL-26-1494, September 9, 2026, Employer Costs for Employee Compensation—June 2026, to calculate the cost of the total annual burden hours:

- Individuals – the hourly rate for all workers is $49.46, including benefits.
- Private Sector – the hourly rate for all workers is $46.89, including benefits.
- Government – the hourly rate for all workers is $66.45, including benefits.

We used a variety of websites to calculate an average hourly rate for range countries (see

"Foreign Governments" tab on Attachment A). For our calculations, where we were only able to locate an average monthly salary, we assumed 40 hours/week × 4.33 weeks/month ≈ 173 hours per month. We also noted which countries we were unable to locate hourly labor data. This tab also includes the websites used to calculate the average hourly cost.

NOTE: To date, we have not received any range country certifications.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- *** The cost estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of 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 collecting 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.**

We estimate the non-hour cost burden to respondents for this information collection to be **$2,800** (see Attachment A). These costs are for application processing fees, which range from $0 to $250. There is no fee for reports. Federal, Tribal, State, and local government agencies, and those acting on their behalf, are exempt from processing fees. Where there is more than one applicable fee, we have used an average of the fees.

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.

We estimate the total cost to the Federal Government to administer this information collection will be **$22,927** (rounded) (see Attachment A). The table below shows Federal staff and grade levels performing various tasks associated with this information collection. Service staff will:

a. Review and determine the adequacy of the information an applicant provides.

b. Conduct any internal research necessary to verify information in the application or evaluate the biological impact of the proposed activity.
c. Evaluate whether the proposed activity meets the issuance criteria.
d. Prepare either a permit or a denial letter for the applicant.
e. Monitor reports.

We used Office of Personnel Management Salary Table 2026-DCB to determine average hourly wages. We multiplied the hourly rate by 1.62 to account for benefits in accordance with BLS News Release USDL-26-1494.

Position/Grade	Hourly Rate	Fully Burdened Hourly Rate*	Time Spent on Collection	Weighted Average ($/hour)*
Office Automation Assistant, GS-05/05	$ 25.31	$ 41.00	5%	$ 2.05
Legal Instrument Examiner, GS-07/05	31.35	50.79	45%	22.85
Biologist, GS-11/05	46.40	75.17	40%	30.07
Program Manager GS-14/05	78.15	126.60	10%	12.66
*Rounded			**Total:**	**$ 67.63**

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are not reporting any program changes or adjustments in hour or cost burden.

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.

There are no plans to publish the results of these information collections.

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.

We will display the OMB control number and expiration date.

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

There are no exceptions to the certification statement.