Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
Information Collection Request (ICR)
OMB 1140-0028
Explosives Licensee Inventories

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Explain the circumstances that make the information collection necessary.

ATF is responsible for enforcing the provisions of 18 U.S.C. chapter 40, added by Title XI of the Organized Crime Control Act of 1970 (Public Law 91-452) in response to the high level of domestically perpetrated criminal acts involving explosives. ATF relies on explosives licensees and permittees (FEL/Ps) to make accurate and timely explosives entries into their records. These records are essential to accounting for explosives inventory and identifying lost or stolen explosive materials. They are also an extremely important source of information for law enforcement during a criminal investigation of theft or other explosives misuse. Explosives FEL/Ps play a significant role in preserving public safety, including preventing crimes involving explosives, such as domestic or foreign terrorist acts.

ATF's regulation at 27 CFR 555.121 provides that FEL/Ps must keep records pertaining to explosive materials in permanent form (*e.g.*, commercial invoices, record books) and in the manner required in 27 CFR part 555, subpart G. These records are required under 18 U.S.C. §§ 842 (f),(g),(j), (k), 843(f), and 847, and are established in the manner set forth in 27 CFR 555.121, 555.122, 555.123, 555.124, 555.125, and 555.127. As part of these requirements, FEL/Ps must take a physical inventory at least once during each year. FEL/Ps must also take special physical inventories when they are: 1) commencing business, 2) changing premises, 3) discontinuing business, or, 4) requested to do so by the ATF Director, Industry Operations. If one of these special inventories occurs, the FEL/P is not required to take an additional inventory that same year.

2. Indicate how, by whom, and for what purpose the information will be used.

ATF uses inventories to determine whether any unlawful diversions of explosive materials have occurred, especially those arising through theft by persons not affiliated with the FEL/P. Licensees/permittees also use the inventories to reconcile current inventory with their records, ensure all explosive materials are accounted for, and identify missing or stolen items.

The FEL/P takes the inventory to establish initial figures from which an audit trail can be developed by ATF field officers during a compliance inspection or criminal investigation. Specifically, ATF uses inventory figures to reconcile the physical inventory on hand and the book inventory the FEL/P maintains. These reconciliations are conducted on an ongoing basis, pursuant to ATF's regular explosives inspections and investigations.

3. Describe whether, and to what extent, the information collection involves using automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronically submitting responses, and the basis for the decision to adopt this means of collecting.

Licensees/permittees create and maintain their explosives inventories and retain them on their business premises as part of their normal operations. They do not report or submit anything to ATF. Although they must record certain information, ATF does not require it to be on a form or in a particular format. Since 2007, FEL/Ps have been permitted to create and maintain all their required records electronically. During inspections of FEL/P operations, ATF uses these inventories to compare with physical explosives onsite.

4. Describe efforts to identify duplication.

This information is not duplicative because a FEL/P creates and maintains unique records based on their business activities in manufacturing, importing, acquiring, and disposing of explosive materials. There is no other source for this information and no other agency requires such records. ATF does not require licensees to use a specific form for this record-keeping requirement.

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

This information collection does not have a significant impact on small entities. These records are similar to those commonly retained as part of normal business activity.

6. Describe the consequences to federal programs or policy activities if the information is not collected or is collected less frequently, as well as any technical or legal obstacles to reducing burden.

Collecting the information less frequently than once a year or not collecting this information at all would pose a threat to public safety and negatively impact accounting for explosive materials. Without regular inventories, more explosive materials would go missing without the ability to determine what might have happened to them, when, and be able to track and retrieve them because many thefts/loss are discovered during the inventory/reconciliation process. If explosives have been stolen, misplaced, or otherwise missing, they could be, and have been in the past, used for criminal actions, terrorism, or other malicious purposes.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

There are no special circumstances associated with this information collection, which is conducted in a manner consistent with 5 CFR 1320.6.

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

The 60-day notice was published in the *Federal Register* on 10/28/2026 (91 FR 67858). The comment period ended on 12/28/2026. ATF received no comments. ATF published the 30-day notice on [DATE] (xx FR xxxxx), with an OMB comment period ending on [DATE].

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

ATF does not provide payments or gifts in connection with this collection.

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

This information collection does not collect protected information and ATF has not assured respondents of confidentiality.

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 information collection does not ask questions or require information of a sensitive nature.

12. Provide estimates of the information collection's hour burden.

ATF records indicate that there are approximately 9,130 respondents to this information collection who must create and maintain an inventory record one time annually. Therefore, there are also 9,130 annual responses to this ICR. ATF estimates that it takes two hours to complete each inventory. Therefore, the total annual burden for this information collection is 18,260 hours.

To calculate an hourly wage rate for this ICR, ATF used the wage rate for Explosives Workers, Ordnance Handling Experts, and Blasters for May 2025, as determined by the U.S. Department of Labor, Bureau of Labor Statistics (BLS).[1] BLS determined the average hourly pay for private sector workers to be $32.04. They also determined that a load rate of 1.4 was appropriate to account for benefits, making the loaded wage rate $44.86 ($32.04 * 1.4).[2,3,4] The monetized value for this ICR is therefore $819,143 annually (rounded) ($44.86 loaded hourly wage rate * 18,260 hours).

[1] https://www.bls.gov/oes/2023/may/oes475032.htm
[2] https://data.bls.gov/dataViewer/view/timeseries/CMU2010000000000D
[3] *https://data.bls.gov/dataViewer/view/timeseries/CMU2020000000000D*
[4] 1.4 load rate = $44.86 total hourly compensation / $32.04 hourly wages and salaries.

Table 1. Estimated annualized respondent cost and hour burden

Activity	Number of respondents	Frequency	Total annual responses	Time per response (hours)	Total annual burden (hours)	Hourly rate*	Monetized value of respondent time
Inventories	9,130	1	9,130	2	18,260	$44.79	$817,865

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

There are no start-up or other additional costs associated with this information collection.

14. Provide estimates of the annualized cost to the federal government.

ATF estimates no additional costs to the federal government associated with this collection. This is due to the current staffing and administrative capacity already in place to complete inspection activities that occur in connection with these records, with long-term staffing capacity serving as a sunk cost. Respondents develop and maintain their own records and ATF does not provide forms, receive reports, or process the inventory records.

15. Explain the reasons for any program changes or adjustments.

The agency has made no program changes during this renewal. However, ATF has revised the title of the ICR from “Inventories: Licensed Explosives Importers, Manufacturers, Dealers, and Permittees” to “Explosives Licensee/Permittee Inventories” for plain writing purposes and to make it shorter. In addition, the number of annual respondents has decreased since the last renewal -- from 9,219 in 2023 to 9,130 in 2026 -- a drop of 89 respondents. This resulted in a corresponding decrease in the total annual burden hours, from 18,438 to 18,260, a difference of 178 hours.

16. For information collections whose results will be published, outline plans for tabulations and publication.

ATF does not publish the results of this collection.

17. If seeking approval to not display the expiration date for the information collection, explain the reasons that display would be inappropriate.

This information collection does not involve a form or other collection instrument upon which ATF could display the expiration date. It requires industry to maintain records/ submit reports they generate themselves. As a result, ATF is not able to display an expiration date on a form, but ATF will display the expiration date on its website where it discusses the topic of this information collection, https://www.atf.gov/explosives/questions-and-answers?

textsearch=&field_q_a_category_target_id=8996 (under the topic of “Is there a requirement for licensees and permittees to make an annual inventory of explosive materials on hand?”).

18. Explain each exception to the certification statement.

This information collection does not include any exceptions to the certification statement.

B. INFORMATION COLLECTIONS EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.