

Supporting Statement – Part A

HONEY SURVEY

OMB No. 0535-0153

A. JUSTIFICATION

- 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.**

The National Agricultural Statistics Service's primary function is to prepare and issue State and national estimates of crop and livestock production, value, and disposition. As part of this function, estimates are made for honey production, stocks, and prices.

Domestic honey bees are critical to the pollination of U.S. crops, especially fruits and vegetables. The survival of bees is threatened by Africanized bees, parasites, diseases, and pesticides. Pollinization by feral bees cannot be relied upon, as the wild bee population has decreased dramatically. In many areas, the wild European honey bee population is virtually nonexistent. Federal, State and local governments provide programs to assist in the survival of bees and to encourage beekeepers to maintain bee colonies. Honey production and price data are required by the government to administer these programs.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

- 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.**

NASS estimates are used by producers and the agribusiness sector of the honey industry to make production and marketing decisions. The Bee and Honey survey is conducted in all States except for Alaska.

The Agricultural Research Service (ARS), State-level Apiarists and Agricultural Colleges throughout the U.S. need NASS honey data to administer their honey bee research programs. ARS has four honey bee research centers. Research projects include parasites, Africanized honey bees, foul brood disease, and food safety and inspection.

The Agricultural Marketing Service (AMS) uses NASS honey production data as source data. The Honey Packers and Importers Research, Promotion, Consumer Education, and Industry Information Order (Order) [7 CFR Part 1212] is authorized by the Commodity Promotion, Research, and Information Act of 1996 (1996 Act) [7 U.S.C. 7411-7425]. Under the Order, assessments are collected on honey and honey products packed or imported into the 50 states, Puerto Rico, and the District of Columbia. The

funds collected are used by the Board for research and development, advertising and promotion of honey and honey products, consumer education, and industry information, under AMS supervision. The Board administers the program and reimburses the Federal government for the costs incurred in implementing and administering the program.

The Economic Research Service (ERS) needs NASS honey data to construct U.S. and per capita caloric sweetener consumption. The data are utilized in the *Situation and Outlook Report* and the *Food Consumption* series, which are mandated by Congress.

The Farm Service Agency (FSA) uses NASS honey production data as source data. The Farm Security and Rural Investment Act of 2002 (2002 Act) provides that the Farm Service Agency (FSA) administer the nonrecourse marketing assistance loan and loan deficiency payment (LDP) program for honey. The honey nonrecourse marketing assistance loan and LDP program provides eligible honey producers with two forms of federal assistance. The program helps to stabilize America's honey industry and ensure the well being of agriculture in the United States. Nonrecourse marketing assistance loans are administered by FSA, on behalf of the Commodity Credit Corporation (CCC).

The Risk Management Agency (RMA) is now offering a pilot insurance program for apiculture. This pilot program will use a 5-year rolling average of USDA National Agricultural Statistics Service (NASS) data of yield based on the NASS State average, and the price is the national average honey price for a given year. This new pilot program uses rainfall and vegetation greenness indices to estimate local rainfall and plant health, allowing beekeepers to purchase insurance protection against production risks.

- 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.**

Web-based data reporting for this survey was approved and conducted for the first time starting December 2003. A questionnaire repository system (QRS) was built which enables simultaneous creation of comparable paper and web survey instruments for the survey. In 2008, nearly 2% of the operations surveyed, completed the questionnaire by use of the internet.

- 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 National Agricultural Statistics Service cooperates with State Departments of Agriculture and land grant universities to conduct agricultural surveys. These surveys meet both State and federal needs, thus eliminating duplication and minimizing reporting burden on the agriculture industry. Data collected on this survey are not available from any other source.

The Farm Service Agency (FSA) had a honey program from 1985 to 1995, again in 2000, and began a 5 year program in 2002. Some FSA offices may have data available

but NASS Field Offices are cautioned about using it. During the estimating period FSA data is not final and the total honey in the FSA honey program changes daily. Beekeepers are not required to utilize the FSA program in a particular State, so the State-level data may not be representative of the honey produced. Also, cross-State movement and multi-State operations make FSA State-level data inconsistent and unreliable.

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.

Operators with fewer than five colonies are not included in the survey. Information requested on the Bee and Honey questionnaire can be provided with a minimum of difficulty by respondents, generally without having to consult their record books.

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.

Bee and honey data are collected only once a year, collecting data less frequently would erode our name and address universe and eliminate information needed to keep the agricultural industry and governmental agencies abreast of changes at the State and national level.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.

There are no special circumstances associated with this information collection.

8. 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.

The Federal Register Notice soliciting comments was published on August 31, 2009 on page 44816. There were 4 public comments. The comments and the responses are attached.

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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Meetings or telephone calls were made with officials at: International Trade Commission; Agricultural Research Service; State Apiarists; Agricultural Marketing Service; Farm Services Agency; National Honey Board; Economic Research Service; Foreign Agriculture Service; Dutch Gold Honey in Lancaster, Pennsylvania; Sioux Honey Association, Sioux City, Iowa; Troy Fore, Jr., Executive Director of the American Beekeeping Federation, Inc., Jessup, Georgia, USDA Inter-agency Pollinators Committee, and the American Honey Producers. These people provide input on trade practices, program changes, and list building. The American Beekeeping Federation

newsletter includes an article in support of the survey each year before questionnaires are mailed.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts to respondents.

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

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905 and Title 7, Section 2276 provide for confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture must read the regulations and sign a statement of compliance.

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

11. Provide additional justification for any questions of a sensitive nature.

There are no 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. 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-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Total hours of burden are based on the calculations below. Reporting time of 2,347 hours are multiplied by \$24 per hour (estimated at farm manager rate), for a total cost to the public of \$ 56,328.

Estimated Annual Burden for Bee and Honey Survey - 2010 - 2012											
Survey	Sample Size	Freq	Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours	
Honey Survey - First Mailing	10,000	1	3,600	3,600	10	600	6,400	6,400	2	213	813
Follow-up Enumeration	6,400	1	4,400	4,400	10	733	2,000	2,000	2	67	800
Pre-Survey Letter and Publicity Materials	10,000	1	8,000	8,000	5	667	2,000	2,000	2	67	734
Total	10,000		8,000	8,000		2,000	4,000			347	2,347

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

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; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

The total cost to the federal government for the annual Bee and Honey Survey is approximately \$325,000. About \$260,000 is for federal salaries, \$48,000 for telephone and field enumeration by associated State employees (of the National Association of State Departments of Agriculture), and \$17,000 for printing, postage, data processing, etc.

15. Explain the reasons for, any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).

At the time of the ROCIS creation and surveys were being moved into this system, there was an error in entering the data into the system. The following table shows the differences in the data that is currently in ROCIS and what should have been in ROCIS.

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	Previous 2007 approved counts in Supporting Statement Part A	Previously approved (incorrect) counts in ROCIS system	Current submission requested counts in Supporting Statement Part A	Difference in incorrect ROCIS counts & Current requested Counts
Sample Size	5,281		10,000	
Total Responses	5,281	64,707	12,000	(52,707)
Number of good Responses	4,602	64,028	8,000	(56,028)
Number of Non-Responses	679	679	4,000	3,321
Total Burden Hours	790	10,694	2,347	(8,347)

The current non-responses, includes two attempts at collecting data from respondents.

In the current submission we are requesting a total of 12,000 responses and 2,347 hours of burden. The changes in sample size and responses are due to the expansion of our list of operators following the list building efforts that took place during the 2007 Census of Agriculture. Also included in the adjustment is the inclusion of burden for publicity materials and a second mailing, which were omitted in the previous submission.

Adjustment differences between current submission and previously approved figures: current submission responses 12,000 minus previously approved 5,281 equals an increase of 6,719 responses; current submission burden hours 2,347 minus previously approved 790 equals an increase of 1,557 hours.

Adjustment of ROCIS data input error; ROCIS responses 64,707 minus previously approved responses 5,281 equals decrease of -59,426 responses; ROCIS burden hours 10,694 minus previously approved burden of 790 hours equals a decrease of -9,904.

Net results: A decrease of -52,707 in responses and a decrease of -8,347 in burden hours. (ROCIS - 59,426 responses plus current submission of 6,719 responses equals a

decrease of -52,707; ROCIS burden hours of 10,694 minus 2,347 current submission burden hours equals decrease of -8,347 hours.

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.

Questionnaires are mailed about December 12th. Operations that do not respond within two weeks will be attempted by phone or personal enumeration. Data collection is completed by late January to reflect December 15 honey stocks. Summarization and preparation of estimates by NASS Field Offices (FO's) are completed by early February and sent to Headquarters. Headquarters acts as the clearing house for multi-State data from FO's. Survey estimates are based primarily on a direct expansion indication. Summarization also includes matching the current year's report to the comparable report received the previous year to calculate a ratio, which is applied to the year earlier estimate of colony numbers to provide an indication of the current number of colonies.

The "Honey" report

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1191>

is published from Headquarters the last week of February. Price data are published by color class at the U.S. level and yield, production, and value data are published on an all honey basis at the State and U.S. level. Some State estimates may be combined to avoid disclosing data for individual operations.

Honey price data is included in the Agricultural Prices Summary, published in August.

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1003>

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 is no request for approval of non-display of the expiration date.

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

There are no exceptions to the certification statement.

December 2009

Revised March, 2010