

SUPPORTING STATEMENT JUSTIFICATION FOR IMPORTATION AND TRANSPORTATION OF MEAT, POULTRY AND EGG PRODUCTS

1. Circumstances Making Collection Of Information Necessary:

This is a request for renewal of the information collection requirements approved under control number 0583-0094 regarding the importation and transportation of meat, poultry, and egg products.

The Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary as provided in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.), the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.), and the Egg Products Inspection Act (EPIA) (21 U.S.C. 1031, et seq.). These statutes mandate that FSIS protect the public by ensuring that meat, poultry, and egg products are safe, wholesome, unadulterated, and properly labeled and packaged.

Meat and poultry products not marked with the mark of inspection and shipped from one official establishment to another for further processing must be transported under FSIS seal to prevent such unmarked product from entering into commerce. To track product shipped under seal, FSIS requires shipping establishments to complete a form that identifies the type, amount, and weight of the product.

Meat, poultry and egg products intended for import into the U.S. must be accompanied by a health certificate, signed by an official of the foreign government, stating that the products have been produced by certified foreign establishments. FSIS has established procedures which allow establishments importing product to stamp such product with the inspection legend prior to FSIS inspection, if they receive prior FSIS approval.

2. How, By Whom and Purpose Information Is To Be Used:

The following is a discussion of the required information collection activities relating to transportation and importation of meat, poultry, and egg products.

Transportation

When meat and poultry establishments ship unmarked product to another official establishment they must complete FSIS Form 7350-1, Request and Notice of Shipment of Sealed Meat and Poultry (325.5). Respondents must supply their name, number, method of shipping, and destination of product, type and description of product to be shipped, reason for shipping product, and a signature. However, because of HACCP, shipping unmarked product with FSIS Form 7350-1 is now rarely done.

FSIS inspectors at the shipping establishment complete the form with the time, date, and serial number of seals. FSIS uses the information on this form to track the shipment of unmarked product.

Meat and poultry establishments must maintain a file of FSIS Form 7350-1 for 2 years from the date the transaction occurred and make the forms available to FSIS program employees upon request (9 CFR 325.10). To facilitate the tracking of unmarked product shipped between official establishments, FSIS inspectors review the FSIS Form 7350-1 when necessary.

Importation

Foreign countries that wish to export meat, poultry, and egg products to the United States must establish eligibility to do so by putting in place inspection systems that are “equivalent to” the U.S. inspection system (9 CFR 327.2 and 381.196) and by annually certifying that they continue to do so. Meat, poultry, and egg products intended for importation into the U.S. must be accompanied by an inspection certificate signed by an official of the foreign government responsible for the inspection and certification of the product (9 CFR 327.4, 381.197, and 590.915).

Import establishments that wish to pre-stamp imported product with the inspection legend before FSIS inspection is complete must submit a letter to FSIS that explains and requests approval for the establishment’s pre-stamping procedure (9 CFR 327.10 (d) and 381.204 (f)).

3. Use Of Improved Information Technology:

Under the EGov Act, electronic versions of these forms have been developed. Records may be maintained

electronically provided that appropriate controls are implemented to ensure the integrity of the electronic data.

4. Efforts To Identify Duplication:

No FSIS office, USDA agency, or any other Government agency requires information regarding exportation, transportation and importation of meat and poultry products. There is no available information that can be used or modified.

5. Methods To Minimize Burden On Small Business Entities:

Data collected from small businesses are the same as for large ones. The information collections must apply to all businesses exporting product to the United States, transporting unmarked product for further processing, and importing product into the United States. FSIS estimates that approximately 75% of the entities affected by this information collection are small businesses.

6. Consequences If Information Were Collected Less Frequently:

To conduct the information collections less frequently would inhibit the ability of FSIS to ensure that unmarked meat and poultry transported for further processing do not enter into commerce, and the ability of FSIS to ensure that imported meat and poultry products are wholesome, unadulterated, and properly labeled and packaged.

7. Circumstances That Would Cause The 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 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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines of 5 CFR 132.5

8. Consultation With Persons Outside The Agency:

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice in the Federal Register on March 18, 2019 (84 FR 9747) requesting comments regarding this information collect request. FSIS did not receive any comments. FSIS also contacted three persons to request input on the Agency's burden estimate for FSIS Form 7350-1: Alice McLaughlin, (970) 506-8000; Emilio Olmedo, (510) 893-5420; and Morris Darnell, (678) 222-9912. All three individuals agreed with the Agency's burden estimate of 5 minutes to complete the form. Therefore, the Agency is making no change to the estimated time for completion.

9. Payment or Gifts to Respondents:

Respondents will not receive any gifts or payments.

10. Confidentiality Provided To Respondents:

No assurances other than routine protection provided under the Freedom of Information Act have been provided to respondents.

11. Questions Of A Sensitive Nature:

The applicants are not asked to furnish any information of a sensitive nature.

12. Estimate Of Burden:

The total burden estimate for the reporting and recordkeeping requirements associated with this information collection is 4,026 hours.

Transportation

The Agency estimates that it takes on the average 5 minutes to complete FSIS Form 7350-1, Request and Notice of Shipment of Sealed Meat and Poultry. Approximately 10 establishments a year will use FSIS Form 7350-1 once a year for a total of 1 hour. It will take an establishment an average of two minutes per form to annually conduct recordkeeping activities for a total of .5 hour rounded up to 1 hour.

**REQUEST AND NOTICE OF SHIPMENT OF SEALED MEAT AND POULTRY
(9 CFR 325.5/FSIS Form 7350-1)**

| Type of Establish- Ment | No. of Respon- dents | No. of Responses per Respondent | Total Annual Responses | Time for Response in Minutes | Total Annual Time in Hours |
|----------------------------|-------------------------|---------------------------------------|------------------------------|---------------------------------------|----------------------------------|
| | | | | | |

| Type of Establish- Ment | No. of Respon- dents | No. of Responses per Respondent | Total Annual Responses | Time for Response in Minutes | Total Annual Time in Hours |
|----------------------------|-------------------------|---------------------------------------|------------------------------|---------------------------------------|----------------------------------|
| Ests. | 10 | 1 | 10 | 5 | 1 |

Importation

FSIS estimates that it will take 36 foreign governments an average of 5 minutes to complete a health certificate that accompanies meat, poultry, and eggs imported into the U.S. an average of 591 times a year for a total of 20,000 responses and 1,773 hours.

**IMPORTED PRODUCTS; FOREIGN HEALTH CERTIFICATE REQUIRED
(9 CFR 327.4 & 381.197)**

| Type of Establish- ment | No. of Respon- dents | No. of Responses per Respondent | Total Annual Responses | Time for Response in Minutes | Total Annual Time in Hours |
|----------------------------|-------------------------|---------------------------------------|------------------------------|---------------------------------------|----------------------------------|
| Foreign Governments | 36 | 591 | 20,000 | 5 | 1,773 |

Importers (brokers) that wish to place an inspection legend on imported meat and poultry product before inspection (pre-stamping) must submit a letter to FSIS requesting approval. It takes an average of 15 minutes to complete the letter, so 3 I-houses will submit one letter a year for a total of 3 responses and 1.5 burden hour annually.

AUTHORIZATION TO PRE-STAMP PRODUCT

(9 CFR 327.4 & 381.195)

| Type of Establish- Ment | No. of Respon- dents | No. of Responses per Respondent | Total Annual Responses | Time for Response in Minutes | Total Annual Time in Hours |
|----------------------------|-------------------------|---------------------------------------|------------------------------|---------------------------------------|----------------------------------|
| I-houses | 3 | 1 | 3 | 15 | 1.5 |

The I-house must maintain for two years a log of information concerning each lot of product that has been pre-stamped. The 90 I-houses will spend an average of two minutes 750 times a year on recordkeeping for an annual total of 67,500 responses and 2,250 hours.

**AUTHORIZATION TO PRE-STAMP PRODUCT RECORDKEEPING
(9 CFR 327.4 & 381.195)**

| Type of Establish- ment | No. of Respon- dents | No. of Responses per Respondent | Total Annual Responses | Time for Response in Minutes | Total Annual Time in Hours |
|----------------------------|-------------------------|---------------------------------------|------------------------------|---------------------------------------|----------------------------------|
| I-houses | 90 | 750 | 67,500 | 2 | 2,250 |

The cost to the respondents for transportation and importation information collection activities is estimated at \$182,607 annually. The Agency estimates that it will cost respondents \$45.35 an hour, including fringe benefits, in fulfilling these paperwork and recordkeeping requirements. Respondents will spend an annual total of 4,026 hours and \$182,607. The hourly rate for the respondents was attained from the Department of Labor Bureau of Labor and Statistics wage data, May, 2018.

13. Capital and Start-up Cost and Subsequent Maintenance

There are no related capital and start-up costs associated with these information collection activities.

14. Annual Cost To Federal Government:

The cost to the Federal Government for these information collection requirements is \$50,299 annually. The cost estimates are based on the inspection review duties necessary to verify that establishments comply with the information collection responsibilities. FSIS estimates that it will cost the Federal Government \$45.35 an hour, including fringe benefits for Agency personnel time.

15. Reasons For Changes In Burden:

There is no change in the estimated burden for this collection.

16. Tabulation, Analyses And Publication Plans:

There are no plans to publish the data for statistical use.

17. OMB Approval Number Display:

FSIS will display the OMB number on any instructions it publishes relating to these recordkeeping activities.

18. Exceptions to the Certification

There are no exceptions to the certification. This information collection accords with the certification in item 19 of the OMB 83-I.

