



National Grain and Feed  
Association



North American Export  
Grain Association

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August 8, 2011

Regulatory Analysis and Development  
Plant Protection Division  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture  
Station 3A-03.8  
4700 River Road, Unit 18  
Riverdale, MD 20737-1238

***Re: Docket No. APHIS – 2011 – 0025: Notice of Request for Extension of Approval of Information Collection; Phytosanitary Export Certification***

The National Grain and Feed Association (NGFA) and North American Export Grain Association (NAEGA) submit this joint statement in response to the U.S. Department of Agriculture Animal and Plant Health Inspection Service (APHIS) request, published in the June 8, 2011 *Federal Register*, to extend for three years the previously approved information collections associated with its regulations for issuing phytosanitary certificates for plants and plant products exported from the United States to foreign countries.

Established in 1896, the NGFA comprises more than 1,000 member companies that operate more than 7,000 facilities and handle more than 70 percent of the U.S. grain and oilseed crop. The NGFA's membership encompasses all sectors of the industry, including country, terminal and export grain elevators; commercial feed and feed ingredient manufacturers; biofuels producers; cash grain and feed merchants; end-users of grain and grain products, including processors, flour millers, and livestock and poultry integrators; commodity futures brokers and commission merchants; and allied industries. The NGFA also has strategic alliances with NAEGA and Pet Food Institute. In addition, affiliated with the NGFA are 26 state and regional grain and feed trade associations. Canadian and Mexican firms also are NGFA members.

NAEGA, a not-for-profit trade association established in 1912, consists of private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA's mission is to promote and sustain the development of commercial export of grain and oilseeds and their primary products. Through a reliance on member action and support, NAEGA acts to accomplish its mission from its office in Washington D.C., and in markets throughout the world.

The NGFA has a Grain Grades and Weights Committee, and NAEGA operates a Grades and Inspections Committee – both of which focus on promoting accurate, efficient and cost-effective grading and inspection of grains, oilseeds and grain products. As such, our associations work extensively with APHIS on sanitary and phytosanitary inspection programs, as well as USDA’s Grain Inspection, Packers and Stockyards Administration on official inspection, weighing and other programs. The services provided by both agencies through these programs are essential to facilitating domestic and international trade in agricultural products, which represent a significant share of our national economy and are one of the sole positive contributors to the U.S. balance of trade.

The NGFA and NAEGA support APHIS’s request to extend for three years the information-collection necessary to complete the forms referenced in this notice – namely, the Application for Inspection and Certification of Plants and Plant Products for Export (PPQ Form 572); the internationally recognized phytosanitary certificate (PPQ Form 577); the export certificate for processed plant products (PPQ Form 578); and the phytosanitary certificate for reexport (PPQ Form 579).

The NGFA and NAEGA also wish to take this opportunity to acknowledge and commend the important ongoing work of APHIS, in cooperation with members of our industry sectors, to facilitate trade and improve the efficiency, cost and overall performance of the U.S. inspection system. The industry also contributes through industry-paid user fees that finance APHIS’s collection of information and data for sanitary and phytosanitary inspections upon which official certificates are based.

The NGFA and NAEGA strongly support the APHIS mission, and express our collective gratitude for the work of the many dedicated, highly effective and professional agency staff members who are instrumental to facilitating timely shipments in international commerce. Specifically, we support:

- An international rules-based system that relies upon APHIS phytosanitary certificates issued at export load points as constituting the final determination on plant pests.
- Innovation and deployment of cost- and time-saving technology. In this regard, we strongly support the APHIS-developed and recently launched Phytosanitary Certificate Issuance and Tracking System, which has considerable potential to reduce operating costs.
- Full accounting and accommodation by APHIS of efficiencies gained from volume, user contribution, utilization of private-sector contracting and coordination with other federal agencies – which we believe should be reflected in user fees assessed by the agency.

The NGFA and NAEGA pledge our continued cooperation to work constructively with APHIS to meet the phytosanitary inspection needs of both importers and exporters. As this work continues, we will seek every opportunity to optimize additional operational savings through improved economies-of-scale and use of technology.

We appreciate the opportunity to convey our views, and would be pleased to respond to any questions the agency may have.

Sincerely yours,

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Kendell W. Keith  
President  
National Grain and Feed Association

A handwritten signature in black ink, appearing to read "Gary C. Martin". The signature is cursive and somewhat stylized, with the first name being the most legible part.

Gary C. Martin  
President and Chief Executive Officer  
North American Export Grain Association