



May 23, 2022

Via: CBP_PRA@cbp.dhs.gov

U.S. Customs and Border Protection
Office of Trade, Regulations and Rulings
90 K Street NE, 10th Floor
Washington, DC 20229-1177

**Re: Safari Club International Comments on Form 4457 Extension Information
Collection Request, OMB Control Number 1651-0010**

Dear Sir or Madam:

Safari Club International (SCI) appreciates the opportunity to comment on the U.S. Customs and Border Protection's (CBP) information collection request to the Office of Management and Budget (OMB) related to Forms 4455 and 4457. SCI's comments are specific to Form 4457 and address point (3) in the Federal Register notice: "(3) suggestions to enhance the quality, utility, and clarity of the information to be collected." SCI fully supports extension of the existing information collection from Form 4457. Critically, OMB and CBP must extend Form 4457 before the expiration date listed on the current version of the Form, September 30, 2022, to avoid creating what can be very difficult circumstances for individuals who travel abroad with personal firearms.

Safari Club International

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 50,000 members and advocates worldwide, many of whom travel to hunt outside of the United States, and in so doing, travel with personal firearms. SCI's missions include the conservation of wildlife, protection of the freedom to hunt, and education of the public concerning hunting and its use as a conservation tool.

Use of an "Expired" Form 4457 Causes Problems for Traveling Hunters

OMB and CBP can enhance the utility of Form 4457 by ensuring that the Form is extended prior to the September 30, 2022 OMB expiration date. Although CBP considers completed Form 4457s valid in perpetuity, foreign governments regularly treat Form 4457 as a permit to possess the relevant item, with the OMB expiration date as the date that authorization to possess expires. Problems arise when there is a gap between the Form's expiration date and extension of the Form.

Individuals who travel abroad with personal firearms, such as hunters, regularly receive increased scrutiny at international borders. When a hunter attempts to enter a foreign country

with an expired Form 4457, they often cannot satisfactorily explain to foreign customs officials that the Form 4457 does not technically expire and that it is not a permit for possession. And some foreign governments even require that the Form 4457's expiration date be more than a year away before allowing hunters to enter with personal firearms. Thus, it is simply untenable that OMB and CBP would allow the Form 4457 to expire before the Form is extended.

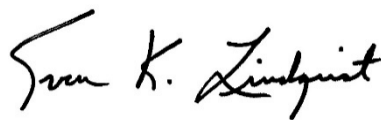
Despite the obvious problems that can arise with use of an expired Form 4457, the federal government has previously been too slow in extending the Form and updating it with a new expiration date. As the following chart indicates, CBP and OMB have demonstrated an inability to timely extend the Form:

Duration of Previous Form 4457	OMB Expiration Date	Date of Extension	Gap Between Expiration and Extension
2016 - 2019	August 31, 2019	September 30, 2019	1 month
2013 - 2016	February 29, 2016	July 31, 2016	5 months
2009 - 2012	August 31, 2012	February 28, 2013	6 months

OMB and CBP must not continue this trend. Form 4457 must be extended with a new expiration date issued prior to September 30, 2022. In addition, an extension duration of more than three years would be helpful for individuals traveling with personal firearms (or expensive camera equipment, or other various items), and it would allow CBP and OMB more time to reauthorize an extension prior to the next expiration date. SCI suggests an extension of five years would be beneficial.¹

If you have any questions or need anything further, please contact Jeremy Clare, Litigation Counsel and CITES Manager, at jclare@safariclub.org.

Sincerely,



Sven Lindquist
President, Safari Club International

¹ In addition to extending the expiration date an additional two years, SCI has other suggestions that would enhance the quality, utility, and clarity of Form 4457. However, SCI does not want to delay the process of extending the current Form 4457 and thus will wait to submit additional suggestions to CBP after the extension is finalized.