As a US pork and beef exporter the new ESRMS reporting requirements that will be required 2023 are unduly burdensome, time consuming and costly for us as a company to comply with.

We have specifically outlined below the additional requirements for the new ESRMS reporting that are time consuming and costly for us as a company beyond current reporting requirements and have included the reasons why.

We are estimating 1-2 additional fulltime positions needed for data entry to comply if additional information and amendments are required. If we do not hire 1-2 additional fulltime employees for data entry for the new requirements, then we would need an extensive IT project to develop software changes to replace the fulltime positions for full time data entry.

We strongly urge FAS to withdraw or modify specifically those new requirements that will prove costly and burdensome for the protein industry to comply with for new ESRMS reporting.

1.   Requiring an ESRMS contract number to be assigned to every contract (sale) reported and requiring the reporting exporter to keep a record of this ESRMS contract number and assign this contract number to our order/sales management system number so that we can then look it up to amend later is not possible with our current system. Under new ESRMS requirements we will need to amend every contract we report at a later time to add required information that is not available at the time the sale is initially reported. So this ESRMS contract number will have to become part of our order management system data so that we can access later for amendments. This would require an additional data entry person in a fulltime position to do this manually. If this is done via software modification it will require a very expensive and lengthy IT project for our company to complete.

2.   The new ESRMS requirements state that exporters will need to report mode of transportation, vessel name, rail name, trucking company and bill of lading date for their contracts (sales). Our company generates hundreds to thousands of contracts (sales) each week. When the initial sale is made and reported the mode of transportation, vessel name, rail name, trucking company and bill of lading date will not be available to include on the report to FAS. This information for each contract (sale) will only be available at a much later date, which will require that each contract (sale) reported will require and amendment at a later time. This means we will be amending several hundred to thousands of contracts per month. This would require an additional data entry person in a fulltime position to do this manually. If this is done via software modification it will require a very expensive and lengthy IT project for our company to complete.

3. I believe this new process to be very cumbersome, time consuming and an invasion of our customer's privacy. We are now giving you direct information of theirs that you would typically receive as a bulk number. You now will know information down to the vessel carrying the load. As for that information, you are expecting us to have all of that information readily available for the report when it may not be. Our logistics system is different than our contract system so you saying that once people are versed in entry it should be less than a 1/2 hr of work is extremely unreasonable. I see this process taking many hours to get you the information that you are deeming necessary.

In addition, I saw many gaps in the process during the training calls. Such as expecting users to remember what Item # 20 is... I haven't been doing the process long and I still have to look at all of those items. How am I supposed to train someone on what Item # 20 is when I don't even know. The only reason that I am apt to do this report weekly is because currently it doesn't take that long to do. It is minutes. If you are expecting us to do all of this new information, it is unrealistic to ask us to do all of this. It is double entry inputting the data into our own user base, and then having to enter it all over again into yours. Our system doesn't allow for excel reports, they are all PDF. Then I have to take the time to convert all the data just to even prepare it for you. And then, I have to go into 5 different areas to even get all of the data that you supposedly need.

3. The new requirements asked to be reported is too excessive. The product, shipper of record, sales price, quantity (Meat is shipped in units/containers of apprx 56,000 net lbs), sales contract period and country of destination is all that should be required. By no means should companies be required to give their customer/consignee. These additional requirements will force most companies to hire additional staff to handle which is a unnecessary cost that exporters should have to bear.