

PUBLIC SUBMISSION

As of: December 02, 2010
Tracking No. 80ba8794
Comments Due: November 29, 2010

Docket: [APHIS-2010-0093](#)

Notice of Request for Extension of Approval of an Information Collection; Lacey Act Declaration Requirement; Plants and Plant Products

Comment On: [APHIS-2010-0093-0001](#)

Notice of Request for Extension of Approval of an Information Collection; Lacey Act Declaration Requirement; Plants and Plant Products

Document: [APHIS-2010-0093-0008](#)

Comment from Giuseppe Lobelia

Submitter Information

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General Comment

See attached file(s)

Attachments

[APHIS-2010-0093-0008.1](#) Comment from Giuseppe Lobelia

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November 29 2010

Mr. Kevin Shea
Acting Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
14th & Independence Avenue SW
Washington DC 20250

Subject: Docket Number APHIS-2010-0093, Notice of Request for Extension of Approval of an Information Collection; Lacey Act Declaration Requirement; Plants and Plant Products

Domtar submits these comments in response to request for public views concerning information collection activities under provisions of the revised Lacey Act published by the Animal Plant Health Inspection Service (APHIS) in the Federal Register (75 Fed. Reg. 60065) on September 29, 2010.

As we have previously expressed, Domtar strongly believes that illegal logging is a serious global problem with detrimental environmental and economic consequences and will continue to work with participating Government Agencies on this very important issue. The recent amendments to the Lacey Act have a direct impact on **all** of our products and in today's economic situation, we are concerned with added administrative burden, complexity and a costly process in our industry, especially since Domtar is an importer, exporter and manufacturer/supplier. ✓

In accordance to the Lacey Act amendments, the plant declaration requirement now includes goods made from trees and products thereof which directly affects all of our products.

Domtar agrees that the current information collection [*declaration form PPQ505*] is a valuable risk assessment tool to the extent that the goods covered in the declaration can be physically inspected and recognized. Goods covered by Chapter 44 (wood), Chapter 66 (umbrella & walking stick), Chapter 82 (tools) just to name a few, maintains their essential characteristics of the wood used and therefore easily identifiable, hence, completing each field of the declaration form for those goods can be straightforward.

Contrarily to the above mentioned goods, the manufacturing of pulp and paper consist of a continuous feeding process having various wood species products [varies according to grade] transformed into wood chips to pulp and/or paper. As a result the raw materials used in the production of pulp and paper [Chapter 47 & 48] are partially (+90%) to totally dissolved, loosing their essential characteristic.

Domtar believes that the current declaration form limits our industry to comply as it requires the exact quantity of wood species used in the production of pulp and paper and compel us to divulge proprietary information to our customer.

Domtar supports the Agency's collection of information as a mean of risk assessment but opposes to the current method for our industry.

Domtar would support any information necessary to APHIS in their duty of performing risk assessments while protecting our proprietary information and understanding the difficulty of our industry to comply with the declaration form as currently required.