

World Wildlife Fund
1250 24th Street, NW
Washington DC 20090

APHIS-2012-0036-0001
Regulatory Analysis and Development
PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Comments regarding extension of approval of an information collection; comment request; APHIS-2012-0036-0001

World Wildlife Fund appreciates this opportunity to provide comments to the Lacey Act amendments (section 8204 of the Food, Conservation and Energy Act of 2008), specifically the implementation of the declaration requirement. We offer the following response to the specific issues identified in the Federal Register notice:

1. The declaration requirement within the Lacey Act is a key piece of the legislation. The information collected helps implementing agencies prioritize investigations, thereby saving money in the long run. At the end of the day, this information is necessary for Lacey Act implementation and serves three important purposes:
 - Strengthening the enforcement abilities of the implementing agencies. The declarations assist with risk analysis for inspections and investigations by enabling agencies to examine patterns, compare declarations to manifests, collect other trade data or CITES permits, understand which ports might be priorities, and better understand to which species and or countries to pay attention, thereby aiding enforcement activities. The declarations contain information that can also support investigations that originate from other sources, and allow investigators to pinpoint individual shipments of interest.
 - Augmenting trade data to support policy making. The declaration data is useful in furthering understanding of where US imports are actually originating and therefore what forest regions are impacted by US consumption. This can support more targeted interventions in support of bilateral aid priorities, bilateral and multilateral trade relationships, and strategic US climate negotiations.

- Increasing transparency in supply chains. The requirement to ask even basic questions about species and country of harvest encourages collection of several facts fundamental for a company trying to reduce risk of illegality and thereby exercise 'due care.' The increased level of questioning in a previously unregulated global market establishes a new level of transparency in business practices, and furthers the underlying purpose of the Lacey Act.
2. Based on input provided to World Wildlife Fund, the declaration requirement is not a overly burdensome to companies. Most commented on an initial learning curve, but once a company was better acquainted with the form and the needed information, none characterized the declaration as burdensome.
 3. The use of an electronic collection system would save time and money for the both the US Government and the importer. It would provide a better means for managing the information collected, as well as inform policy initiatives with specific countries. World Wildlife Fund supports dedicated funds for APHIS to implement an electronic system and hire sufficient personnel to perform the data analysis needed for monitoring and enforcement purposes.