



August 6, 2012

Docket No. APHIS-20012-0036  
Regulatory Analysis and Development  
PPD, APHIS, Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

To Whom It May Concern:

I write in order to comment on the Notice of Request for Extension of Approval published June 6 in the Federal Register (77 FR 109, p. 33388) concerning the Lacey Act Declaration Requirement as it applies to plants and plant products. The United Steel, Paper & Forestry, Rubber, Manufacturing, Energy, Allied-Industrial and Service Workers International Union (USW) is the largest union of paper and forestry workers in North America and, therefore, has a strong stake in how the Lacey Act, and its declaration requirements apply to plants and plant products, is enforced.

Specifically, I am writing to strongly support APHIS' inclusion of paper and paperboard products (which we take to include pulp) as subject to the Lacey Act declaration requirement in the second paragraph of the Supplementary Information section of the above-referenced notice.

We believe that the information APHIS collects as part of this effort is essential in order to make the declaration requirement as transparent and useful as possible. I want to emphasize, as USW has done in previous submissions on this matter, the need for APHIS as soon as possible to explicitly include pulp, paper, paperboard and the products made therefrom in the declaration requirement.

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United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union

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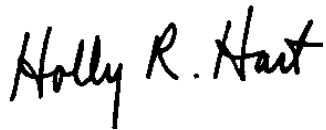
[www.usw.org](http://www.usw.org)

As noted in our previous submissions, these three categories of products are by far the largest item of wood products imports into the United States. In fact, trade figures through April 2012 from the U.S. International Trade Commission show that imports into the United States of pulp, paper, paperboard and their products were almost double those of solid wood and its products. They are therefore, the surest route to improving the Lacey Act's already solid record of curbing the practice of illegal logging. We believe, specifically, that the collection of information on pulp, paper, paperboard and the products made from these materials is essential for the function of APHIS in its efforts to enforce the Lacey Act.

It is our belief that the information collected will have a great deal of practical utility in order for the agency to implement an effective declaration requirement for these materials. Once the declaration requirement is in effect for these materials, it has the potential to far more than double the Lacey Act's impact on illegal logging.

Thank you very much for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Holly R. Hart". The signature is written in a cursive, flowing style.

Holly R. Hart  
Assistant to the International President  
Legislative Director

HRH/rdb