

May 4, 2012

Office of the Deputy Administrator,  
USDA/AMS/Dairy Programs, Room  
2968-S, 1400 Independence Avenue  
SW., Washington, DC 20090-6465

Re: Docket Numbers AMS-DA-11-0061 and DA-11-06

This filing is in response to the notice of request for public comments concerning Export Health Certificate Request Forms issued by the Agricultural Marketing Service of the U.S. Department of Agriculture, which appeared in the Federal Register Vol. 77, No. 43, Monday, March 5, 2012 on Page 13070. The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) appreciate the opportunity to present their views on this important government activity. NMPF is the national farm commodity organization that represents dairy farmers and the dairy cooperative marketing associations they own and operate throughout the United States. USDEC is a non-profit, independent membership organization that represents the export trade interests of U.S. milk producers, dairy cooperatives, proprietary processors, and traders. USDEC's mission is to increase the volume and value of U.S. dairy product exports.

AMS plays a critical role in working with the other relevant federal agencies, including APHIS, FAS, FDA and USTR, to address foreign nations' requirements for various health certificate statements in order to find a way to allow for the continuation of high quality U.S. dairy exports to a wide variety of countries. Timely inter-agency cooperation is absolutely critical to ensuring that trade is not disrupted. We urge USDA, USTR and FDA to continue to ensure that their personnel have the appropriate time and resources needed to work together to address these issues.

Once certificate language has been agreed upon, AMS then frequently plays the final critical role of issuing many of the certificates that allow the U.S. to export dairy products. Without this role, dairy product exports to many countries would be impossible.

Dairy exports in 2011 reached almost \$4.9 billion, a 30 percent increase from 2007, despite the negative effect on global demand for high value products of the economic recession that occurred during part of that period, as well as ongoing trade barriers that continue to limit the total potential of U.S. dairy exports. These exports provide dairy producers a significant additional outlet for their production, which, in turn, helps bolster prices to farmers and reduce the cost of government programs. These sales opportunities also help the manufacturing companies directly involved by expanding their customer base and the many supporting companies, such as traders and shipping companies, which further support this commercial activity.

The responsibilities AMS assumes in carrying out this activity on behalf of U.S producers, processors and exporters are certainly not insignificant. As outlined in the Federal Register

Notice, these include determining the requirements of importing countries' health agencies, collecting information required from the exporter, and providing a certificate appropriate to the specific requirements of an importing country. We have no reason to question the estimates of time expended by AMS in these efforts, as delineated in the Notice, but we believe strongly that the benefits to the dairy industry at all levels more than compensate for the time and resources required. It is abundantly clear that the role AMS plays in this process, including providing differentiated certificates for many of our leading customers, is absolutely critical to our ability to export to them at all.

We also have no objection to modifications to the process that would enhance the quality, utility, and clarity of the information to be collected, or that would minimize the burden of the collection of information on those who provide the necessary information. Such changes could certainly include the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Thank you for the opportunity to comment on this issue.

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