

Ehrhart, Connie - FAS

From: Swisher, Kent
Sent: Tuesday, November 24, 2015 11:38 PM
To: FAS-RMB-PodAdmin
Subject: Federal Register Document Number: 2015-24394
Attachments: 15 11 23 NRA - OMB 0551-0026 Comments.doc

Please find attached, NRA's comments to Federal Register 2015-24394

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NATIONAL RENDERERS ASSOCIATION

November 23, 2015

Mr. Mark Slupek
Director, Program Operations Division
Foreign Agricultural Service
Room 6510, STOP 1042
1400 Independence Avenue SW.
Washington, DC 20250

Submitted via email: podadmin@fas.usda.gov

Re: Foreign Market Development Cooperator Program and Market Access Program

Federal Register Document Number: 2015-24394

OMB Number: 0551-0026.

The National Renderers Association (NRA) appreciates the opportunity to respond to the Federal Register notice of September 25, 2015 requesting comments concerning the burden of collecting information for the application and administration of the Market Access Program (MAP) and the Foreign Market Development Program (FMD). NRA is the international trade association for the industry that safely and efficiently recycles and processes by-products from the food production system into valuable finished products for the livestock, pet food, chemical, cosmetic, and energy industries. The U.S. rendering industry is valued at 10 billion dollars with exports averaging over 1 billion dollars annually. NRA has been a commodity cooperator with the USDA/FAS since the inception of the FMD and MAP programs and has utilized those programs since their beginnings.

The NRA estimates a total of over 120 hours annually to comply with the reporting requirements of the MAP and FMD programs. The largest time burden, estimated at approximately 60 hours, is the development and submission of the Unified Export Strategy (UES) and the Country Progress Reports (CPR's).

The burden of time involved in meeting the requirements of the MAP and FMD programs could be greatly diminished through a more functional online reporting system. The current online system does not allow for the downloading of entire spreadsheets when entering trade data. Hence, one must manually type trade data into every box. This is also an issue when submitting for claims in the online system. Instead of downloading a

spreadsheet with the data needed to make the claim, one must enter each bit of data individually into each drop down box. Fixing the current online system so it would allow for the importation of spreadsheets for the massive amount of trade data and monthly claims would likely be the easiest way to get the greatest time savings. In addition the overall online reporting system is fairly burdensome. The NRA staff write the annual UES and then need to copy and paste it into the online system. The online system is very fragmented and it is time consuming to enter the information because of a plethora of drop down boxes and different boxes to insert different information. In addition this information is normally unformatted after it is entered so that when you print off the UES information from the website it is very unusable due to the lack of formatting. Correcting the aforementioned issues would greatly reduce the amount of time involved in administering the MAP and FMD programs. It would also enhance the functionality of the UES.

We appreciate the cooperative relationship that the NRA enjoys with the USDA/FAS through the MAP and FMD programs. These programs are a model for how government and industry can work together for the expansion of trade. Should you have any questions or concerns please contact Kent Swisher, NRA's vice president of international programs at 703-683-3561 or kswisher@nationalrenderers.com.

Sincerely,

A handwritten signature in cursive script that reads "Kent Swisher".

Kent Swisher
Vice President
National Renderers Association