

24 September 2007

Mr. Warren Preston
Chief, Livestock and Grain Market News Branch
Agricultural Marketing Service
U.S. Department of Agriculture
Room 2619-S
1400 Independence Avenue, S.W.
Washington, DC 20250-0252

Dear Mr. Preston

**Re: Livestock Mandatory Reporting;
Proposed Rule and Invitation for Comment, Docket No. LS-07-01**

On behalf of Meat and Livestock Australia ("MLA") I am pleased to submit these comments in response to the USDA AMS Proposed Rule for Livestock Mandatory Reporting; Reestablishment and Revision of the Reporting Regulation for Swine, Cattle, Lamb, and Boxed Beef published in the *Federal Register* of August 8, 2007.

MLA is a producer-owned company with 40,000 livestock producer-members. It provides services to Australian livestock producers, processors, exporters, foodservice operators, and retailers and represents many producer-members who raise beef and lamb for export to the United States.

MLA believes that the mandatory price disclosure of imported lamb products as outlined in the proposed rule raises concerns regarding the confidentiality of individual company's business information and the costs that will be born by a limited number of small companies that are involved in the importation of lamb into the United States.

Prior to September 2005, when the statutory authority for Livestock Mandatory Reporting lapsed, lamb importers were required to indicate the country of origin when reporting prices for imported lamb. Reporting information on the country of origin of imported lamb increases the risk of disclosing confidential business information because it allows further disaggregation and consequent disclosure of individual company's pricing structures. In previous public comment MLA recommended that the

Department should not collect information on the country of origin of imported lamb. We recognize that Section 12 of the April 2007 version of form LS-128 only requires a company to indicate "Domestic" or "Imported" as the product's source. MLA supports this amendment.

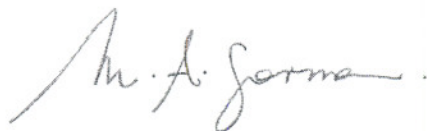
The importation of lamb into the United States is conducted by a modest number of relatively small companies who report that the economic and time burden of mandatory price reporting is significantly higher than indicated in the proposed rule. The cost of compliance in relation to data collection, recordkeeping and data submission is higher for small companies due to lower staff numbers and higher overheads compared to larger businesses. MLA requests that the Department minimize, wherever possible, the time and resources required to collect price data from importers of lamb.

In conclusion MLA requests that when the Department implements mandatory price reporting for imported lamb it is done in a way that:

- Maintains the confidentiality of individual company's business information, and
- Minimizes the time and resources required to comply – recognizing that only a limited number of small companies are classified as lamb importers under the proposed rule.

Please do not hesitate to contact MLA should you have any questions about this submission.

Regards



Michelle Gorman
Regional Manager - North America