

The
Ornithological
Council



PROVIDING
SCIENTIFIC
INFORMATION
ABOUT BIRDS

American Ornithologists' Union
Association of Field Ornithologists
Birds Caribbean
CIPAMEX (Sociedad para el Estudio y
Conservación de las Aves en México)
Cooper Ornithological Society
North American Crane Working Group
Neotropical Ornithological Society
Pacific Seabird Group
Raptor Research Foundation
Society of Canadian Ornithologists/
Société de Ornithologistes du Canada
The Waterbird Society
Wilson Ornithological Society

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Michael Poe
Office of Budget and Program Analysis,
USDA
Jamie L. Whitten Building
Room 101-A
1400 Independence Ave. SW.
Washington, DC 20250.

Identifying Regulatory Reform Initiatives

Submitted through e-rulemaking portal

Dear Mr. Poe,

The Ornithological Council is a consortium of eleven scientific societies of ornithologists. Most of the members of those societies study wild birds. Six of these societies are based in the United States and the other five are located throughout the Western Hemisphere, but all have members who import scientific research material into the United States. Therefore, they are heavily reliant on the APHIS National Import Export Services staff.

We have had uniformly excellent experiences with and service from NIES over many years. They keep us fully informed of changes in policy and procedure that might affect our members and they always solicit our input as to potential burden. They make every effort to ameliorate that burden.

We have only one request to make and it pertains to permit duration. Currently, the import permits issued to our members (the "VS16-3" permit) has a one-year duration. Two types of VS16-3 permits are issued. One allows the import of untreated avian research material from certain countries if the importer has a USDA-approved Biosafety Level 2 lab. The inspections occur at three-year intervals. Therefore, the interim permit renewals serve no purpose other than to generate permit fees for the NIES. We understand the need for the permit fees. This small office is underfunded and understaffed. However, the fees and the time to renew the permits is burdensome on the regulated community. We have offered a compromise that would reduce agency workload and reduce burden on our members, which is to extend the permit duration to three years but at double the current fee for a single-

year permit. The agency would have one-third the workload for two-thirds of the funding. It would reduce the financial burden to our members by one-third and reduce the workload by two-thirds.

This is particularly important because the NIES has split the import permits into two permits, due to the complexity of the import requirements. Frankly, we think that the permit language could be simplified and the two permits re-combined into one, but unless that happens, our members are paying for two permits – one for treated material and one for untreated material.

The other type of permit requires that all avian research imports be treated prior to import. There seems to be no reason at all for the one-year duration except, again, to generate fee revenue.

We hope that the Secretary will provide sufficient resources to NIES and also direct the agency to extend permit duration to three years, with a fee equivalent to twice the fee for a single-year permit.

Sincerely,

A handwritten signature in black ink that reads "Ellen Paul". The signature is written in a cursive style with a large, looped initial "E".

Ellen Paul
Executive Director