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February 3, 2020

Docket No. APHIS-2019-0075
Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

RE: APHIS-2019-0075. Notice of Request for Revision to and Extension of Approval of an Information Collection; Phytosanitary Export Certification

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than \$21 billion. Annual cotton production is valued at more than \$5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost \$75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

The Animal and Plant Health Inspection Service (APHIS) is requesting a revision to, and extension of approval of, an information collection associated with the regulations for the issuance of phytosanitary certificates for plants or plant products being exported to foreign countries.

APHIS is asking the Office of Management and Budget (OMB) to approve their use of phytosanitary information collection activities for an additional 3 years. The purpose of this notice is to solicit comments from the public concerning the information collection. One issue that APHIS seeks comments on is to evaluate whether the collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility.

The cotton industry relies heavily on the phytosanitary certificate process to provide for a science-based approach to address any plant health concerns for the export of U.S. cotton. The U.S. cotton industry exports over 80% of its annual production in the form of ginned and baled

cotton fiber, therefore phytosanitary certificates play a major role in the health of the industry and the overall economy. Thus, the NCC supports the APHIS request to continue information collection activities for an additional 3 years.

There are issues with import authorities in some countries that do not fully recognize and accept the phytosanitary certificates issued by the U.S. government. For example, despite export fumigation at origin, some countries require a second fumigation at destination, coupled with restrictions that make trade difficult and more expensive. In collaboration with APHIS, the U.S. cotton industry has been attempting to work through these difficulties but has been met with limited success in a few countries. We would recommend a system where phytosanitary certificate acceptance involving fumigation requirements based on scientific demonstration of need is universal.

The industry is also eagerly awaiting the completion of the “e-phyto” project development to show substantial results in improving the speed and efficiency of the phytosanitary certificate process.

Thank you for the opportunity to comment on this issue.

Regards,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley
Senior Scientist, Regulatory and Environmental Issues
National Cotton Council