

The
Ornithological
Council



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ABOUT BIRDS

Association of Field Ornithologists

Birds Caribbean

CIPAMEX: Sociedad para el Estudio y
Conservación de las Aves en México

Neotropical Ornithological Society

North American Crane Working Group

Pacific Seabird Group

Raptor Research Foundation

Waterbird Society

Wilson Ornithological Society

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30 May 2023

Docket No. APHIS–2023–0008
Regulatory Analysis and Development
Animal and Plant Health Inspection Service
Station 3A–03.8
4700 River Road
Unit 118
Riverdale, MD 20737–1238

Thank you for the opportunity to submit these comments regarding the Animal and Plant Health Inspection Service's intention to request an extension of approval of an information collection associated with the regulations to prevent the introduction of highly pathogenic avian influenza, all subtypes, and Newcastle disease into the United States through the importation of pet, performing, and research birds and poultry, and unprocessed bird and poultry products. In particular, we offer the following comments on Form VS 16-3: Application for Permit to Import Controlled Material; Import or Transport Organisms or Vectors.

The Ornithological Council is a consortium of scientific societies of ornithologists. The research conducted by their members spans the globe and their cumulative expertise comprises the knowledge that is fundamental and essential to science-based bird conservation and management.

Many of the ornithologists who are members of the organizations that make up the Ornithological Council must secure import/export permits from APHIS, either regularly or from time to time during their career. Given this, ensuring that the process of applying for, renewing, and amending these permits is efficient and predictable is of the utmost concern to the Ornithological Council.

We appreciate the willingness of the APHIS Veterinary Services Program staff to work with us over the years to ensure that the APHIS import/export permits meet the needs of both the ornithologists and the agency.

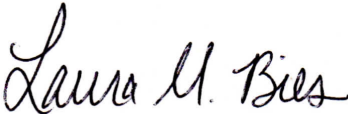
Our first recommendation is that APHIS consider extending the duration of import/export permits from one year to three years. This would reduce the workload for ornithologists who must apply for these permits each year. It will also reduce the workload for the APHIS staff who must review and approve these permits every year.

We would also encourage APHIS to make clear how the different disease categories apply. Some countries, where there were previous avian influenza outbreaks, are not eligible to be included on blanket permits (i.e., permits that allow imports/exports to/from a variety of countries over the length of the permit), but this is not made clear on the APHIS website, on the application form, or within the online permitting system. This has led to ornithologists applying for a permit that included several countries and then receiving a permit that did not include one of those countries, without understanding why or that a separate permit was needed. Having these distinctions clear ahead of time would save time for both those applying for permit and for APHIS staff.

Also, recent feedback from ornithologists using the online system to apply for permits has revealed that, once you are in the process of renewing a permit, there is not an easy way to discern which permit you are working on, based on the information visible on the screen. The online permitting system gives you the application number at the top of the page, but no permit number. For those applicants with several permits, being able to easily see the permit number as they navigate the online permitting system would be helpful.

We value our partnership with the APHIS Veterinary Services Program and we appreciate this opportunity to share information with the agency about how the requirements of the APHIS import/export permit system impact ornithologists. Thank you in advance for considering our views.

Sincerely,

A handwritten signature in black ink that reads "Laura M. Bies". The signature is written in a cursive, flowing style.

Laura M. Bies
Executive Director