

# The Ornithological Council



PROVIDING  
SCIENTIFIC  
INFORMATION  
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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9 June 2023

Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: PRB (JAO/3W)  
Falls Church, VA 22041-3803

Re: Docket Number FWS-HQ-LE-2023- 0049

Thank you for the opportunity to submit these comments regarding the declarations necessary for the import and export of wildlife into and out of the United States.

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. The members of these scientific societies may be researchers working for academic institutions, museums, agencies or non-profit organizations. Their work runs the gamut from field research, to teaching, to curating museum collections. Collectively, the ornithological research they conduct and facilitate enables ornithological conservation work around the globe.

Many of the ornithologists who are members of the organizations making up the Ornithological Council will import or export birds or bird specimens, either regularly or from time to time during their career. Given this, ensuring that the process of completing and submitting to the U.S. Fish and Wildlife Service the Form 3-177 is efficient and predictable is of the utmost concern to the Ornithological Council.

The Federal Register notice for this information collection has asked for information and feedback regarding the following questions:

1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;

- (2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;
- (3) Ways to enhance the quality, utility, and clarity of the information to be collected; and
- (4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submission of response?

### **Ability to upload bulk information**

We appreciate the ability of importers/exporters to file either a paper Form 3-177 or to use the eDecs electronic system. However, when using the online system to submit their eDec, it is cumbersome that each specimen has to be entered individually, rather than having the option to upload a spreadsheet or otherwise enter a batch of information at once. Are there any other options for individuals or institutions that are submitting 3-177s for imports/exports that have many specimens? If there was a standard spreadsheet format, for instance, that importers/exporters could use and upload all specimen info at once, it would save them a great deal of time.

For some institutions, filing an eDec for import or export can take several hours to enter all the needed information, requiring the filling of hundreds of fields one-by-one. Although individual specimens can be grouped if they are the same species, more commonly those import/exports are made up of specimens of all different species, requiring each to be entered separately. Previously, the system allowed the upload of a spreadsheet. We recommend reverting back to this practice to reduce the burden on applicants, which is very high for some users and some shipments.

Also complicating submissions of +100 specimens is that there appears to be a limit on how many individual specimens can be entered before the eDec auto-submits and then the user has to go back to that eDec in their account and chose to edit it. This has happen to one of our institutions in multiple browsers, so appears to be a glitch in the eDecs system

### **Cross-checking for required permits**

It would be helpful if, when entering species into eDecs, the system would more clearly automatically recognize and flag species which require permits from USFWS to import/export (i.e., Migratory Bird Treaty Act, Endangered Species Act, Convention on International Trade in Endangered Species of Wild Fauna and Flora). This would assist importers/exports in determining whether they have secured the necessary permits before shipping the items. Over 1000 species are listed under the MBTA alone, and if dealing with a shipment of ~100 bird specimens, it is very time consuming to individually check the legal status of each species individually. In some web browsers, this information is easily finable in a pop-up window and in

some it is not. Ideally, there would be a way to upload a list of species and have the legal status of each checked when planning an import/export, even before completing the eDec. Currently, researchers and importers/exporters have to check three separate lists in three separate places to determine whether species are covered by the MBTA, ESA and CITES.

### **Time estimate for eDecs**

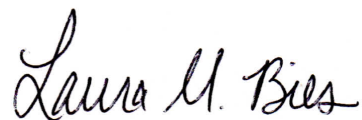
The notice estimates the average time that it takes to submit a declaration for either an import or an export through eDecs at 10 minutes. This is likely an appropriate estimate for a simple import/export that includes only one or two species. However, in the ornithological specimen context, many imports/exports include many more than this — some shipments can include upwards of 100 specimens, all of different species. In these situations, it can take hours to complete the necessary information in eDecs.

### **Conclusion**

The import and export of bird specimens by the ornithological community allow research to take place, all around the world, which directly benefits birds, bird populations, and their habitats. We encourage USFWS to take a holistic view of trade regulation which considers how the agency's permit and declaration systems work for users that import/export large numbers of diverse species, each with potentially different layers of at least 3 special permits (CITES, MBTA, ESA) and each potentially from a different country and/or sub-species.

We value our partnership with the USFWS and we appreciate this opportunity to share information with the agency about how the requirements of the agency's import/export declaration system impacts 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