

NATIONAL MILK PRODUCERS FEDERATION & U.S. DAIRY EXPORT COUNCIL

RESPONSE TO REQUEST FOR PUBLIC COMMENT TO INFORM DEVELOPMENT OF NATIONAL EXPORT INITIATIVE PLAN

JULY 26, 2010

This submission is in response to the June 30, 2010, *Federal Register* "Request for Public Comment To Inform Development of National Export Initiative Plan". The National Milk Producers Federation (NMPF) and U.S. Dairy Export Council (USDEC) appreciate this opportunity to provide comments on President Obama's National Export Initiative (NEI), launched via Executive Order 13534 in order to achieve the goal of doubling U.S. exports of goods and services over five years to facilitate the creation of jobs in the United States.

NMPF is the national farm commodity organization that represents dairy farmers and the dairy cooperative marketing associations they own and operate throughout the United States. USDEC is a non-profit, independent membership organization that represents the export trade interests of U.S. milk producers, proprietary processors, dairy cooperatives, and export traders. The Council's mission is to build global demand for U.S. dairy products and assist the industry in increasing the volume and value of exports.

There are a variety of avenues that the U.S. government could help to boost U.S. dairy exports. Our comments below break these into various categories of approaches, taking into account the types of information specifically requested in the federal register notice.

**1. Resolve Unjustified SPS Requirements and Other Non-Tariff Barriers Putting Markets At Risk and Limiting Export Growth**

One of the U.S. dairy industry's biggest current problem areas that requires priority attention is the resolution of sanitary and phytosanitary (SPS) and other non-tariff barriers that hinder or threaten to hinder U.S. dairy exports. Key examples of current major trade problems are listed below. In addition to addressing these barriers, on-going U.S. government involvement is required to address other barriers imposed by foreign countries.

- India: The vast majority of U.S. dairy exports are now blocked from the Indian market, due to barriers India has maintained on U.S. dairy exports since late 2003, when their import permit requirements were revised to require arbitrary and unfeasible new government attestation statements. The U.S.-India dairy trade relationship has become very unbalanced and dramatically tilted in India's favor due to these barriers, despite the growth in U.S. export competitiveness seen over this period. India now exports nearly ten times the value of dairy products to the United States as the U.S. exports to India. This is due almost entirely to the protections India has erected to thwart competition from U.S. dairy products while the U.S. maintains relatively open access on products of commercial interest to India such as casein.

India has shown a repeated unwillingness to constructively work to resolve this issue and to ensure that all of its restrictions are based on sound science. The U.S. has provided considerable scientific data in support of our position, compromise solutions to address India's concerns, as well as information demonstrating that the vast majority of countries around the world that accept our dairy products and recognize them as safe.

India, the second most populous country in the world with a population of more than 1 billion, presents a large and unrealized market opportunity for the U.S. dairy industry. USDEC has estimated the potential market in India to be worth tens of millions of dollars in only the medium-term, let alone the anticipated

growth in a country that continues to experience remarkable economic growth. Resolution of this longstanding issue is critical to maximizing future export possibilities for our industry in that region of the world.

- China: We currently face a great challenge related to the dairy health certificate requirements being articulated by China. At present, it would appear that China intends to impose stricter requirements on U.S. dairy exports than on exports from other major dairy suppliers without any indication that U.S. dairy products pose a greater risk to human health. In fact, as our government is well aware, U.S. dairy products are supremely safe, given their production under our robust oversight and inspection system for dairy products in the U.S. Our exports are also, in the vast majority of cases, made from the same milk sources as product destined for U.S. consumers, as well as millions on consumers in the other markets around the world which recognize the quality and safety of U.S. dairy products.

U.S. dairy exports to China averaged \$168 million over the last three years, making it our third largest export destination (behind only Mexico and Canada). At this date, U.S. exports continue to be permitted entry to China but no guarantee exists regarding the duration of that situation given the ongoing health certificate negotiations. This market has been expanding rapidly over the past several years and expectations for continued growth in the demand for imported dairy products are high. If we are unable to resolve this critical certificate issue, however, that great opportunity will be forfeited to our competitors who have all managed to secure an agreed-upon health certificate for access to the Chinese market at this time.

- European Union: Discussions with the European Union over the past year have indicated that the current U.S. testing and certification program for documenting U.S. Somatic Cell Count (SCC) levels is not in keeping with current EU SCC regulations. The EU's on-farm SCC limit is nominally 400,000; however Member States within the EU have a wide range of flexibilities permitted to them in trying to achieve this level both through EU regulations and Member State interpretation.

As the Food and Drug Administration has so rightly stressed to the Europeans for over a decade now, SCC levels for raw milk are quality criteria and not food safety criteria and as such should not be required as part of public health attestations. This is all the more so notable given the details of the EU's SCC regulations which set a three month rolling average "limit" of 400,000 SCC but permit milk that exceeds this level to be sold for extended periods of time. Furthermore, it becomes an even greater concern given the prospect now facing the U.S. industry of the EU's desire to see this "limit" adhered to at the farm level as opposed to at the plant/comingled milk level. This appears to the U.S. dairy industry to be a clear sign of the EU's effort to begin to impose its own quality and animal welfare preferences on imported products, regardless of the availability of science to support a public health justification for such measures for imported products.

The EU market accounted over for an average of \$116 million worth of direct U.S. dairy sales over the last three years, as well as large quantities of U.S. exports of processed food products that contain U.S. dairy ingredients. NMPF and USDEC are hopeful that the recent discussions between our government and the EU will lead to a process that will permit us to find a resolution to this vexing issue that can permit trade to continue but most importantly will not unduly burden U.S. dairy producers with requirements wholly unrelated to food safety.

- In addition, other SPS and non-tariff barrier issues were detailed in the comments submitted to the Office of the U.S. Trade Representative (USTR) for the 2010 Report on Sanitary and Phytosanitary Measures (SPS Report), the 2010 National Trade Estimate Report and the 2010 Technical Barriers to Trade (TBT Report). These additional issues remain of concern to our industry. Resolution of them would preserve and/or expand valuable export markets for U.S. dairy products. In these comments we have chosen not to revisit that information provided so recently to USTR and to focus our remarks on the issues of greatest impact and concern at this stage in time to our industry from an SPS and NTB perspective.

As the U.S. government works to address the many egregious SPS and NTB issues that thwart U.S. dairy and other agricultural exports, seamless coordination is needed between the areas of the U.S. government focused on trade policy matters (e.g. USTR and the Foreign Agricultural Service) and our regulatory agencies (e.g. the Food and Drug Administration, the Agricultural Marketing Service, and the Animal & Plant Health Inspection Service). These types of technical barriers, particularly as they related to foreign import certificate requirements, simply cannot be resolved without close and timely work between USTR, FAS and the appropriate regulatory agencies for the given issues and U.S. agricultural sector.

Our industry has seen examples where such coordination has worked well to the benefit of the U.S. dairy industry, but has also unfortunately seen examples where the proper working relationship has not developed and where all involved agencies do not bring the same sense of urgency and creativity to seek resolution of a given export barrier. Although procedures are in place to encourage this, it has been our experience that there at times still not the desired level of interaction and cooperation between all these agencies that would be most effective in bringing the full range of the U.S. government's efforts to bear to resolve trade challenges. In short, if the National Export Initiative is to become truly a strategic initiative for the entire U.S. government, then all relevant agencies should fully coordinate their efforts to quickly resolve the recent proliferation of SPS and NTB issues that hinder trade and permit countries to more subtly evade their WTO commitments.

## **2. Create New Access Opportunities for U.S. Dairy Exports**

NMPF and USDEC strongly support the pending free trade agreements with South Korea, Colombia and Panama. Of these, the FTA with Korea is by far the most significant in importance to the U.S. dairy industry. Each of these agreements will provide beneficial new export opportunities and important net benefits.

- Korea: The expected benefit to the U.S. dairy industry over the first several years of the Korea agreement, resulting from increased exports of cheese, whey and skim milk powder, among other dairy products, is an additional \$380 million per year on average. The U.S. international Trade Commission estimated the increased dairy exports under our FTA with Korean to be between \$175 million and \$336 million. This is remarkable for any market, but particularly for one that totaled \$70 million at the time of the USITC study in 2007 and last year amounted to \$77 million.

However, it must be noted that Australia, the European Union and New Zealand have moved forward in their free trade agreement negotiations with Korea and the current opportunities for U.S. dairy products in the Korean market may be greatly eroded if the U.S. – Korea FTA does not move swiftly forward. That is why we were greatly gratified by the President's remarks in June regarding the intention to resolve outstanding issues prior to his meeting in Korea in November. We hope that this timeline proves achievable and that it subsequently moves forward to swift Congressional consideration.

One issue that has arisen in part due to the delay in action on the U.S.-Korea FTA is the issue of impact on our cheese exports due to geographical indication (GI) provisions in the EU-Korea FTA. As noted below in greater detail, the EU is staging a brutal assault on the use of many cheese terms commonly used in the U.S. and in many dairy producing countries around the world in order to secure the unilateral right to the use of certain generic cheese names such as parmesan and feta. In the context of the U.S.-Korea FTA this would directly undermine the access negotiated for U.S. cheeses in our FTA, thereby greatly impaling the package of concessions that Korea granted to the U.S. in that agreement.

Given the vastly different personnel required to address Intellectual Property issues vs. manufacturing (e.g. autos) and agricultural issues (e.g. beef) and the fact that Korea will be developing regulations in the very near future to implement the terms of its FTA with the EU, it is critical that the U.S. seize upon this opportunity to sufficiently address this issue with the Koreans in order to avoid negative market access

impacts on U.S. cheese exports. Attempting to address our concerns after the Koreans have put in place their GI regulations and implemented their agreement with the EU will prove to be a much greater challenge than addressing this issue at this point in time.

This is important not only for the current mix of products exported to Korea but also for the many cheese types produced here in the U.S. whose sales were expected to expand through use of the U.S.-Korea FTA.. This latter category includes cheese types less commonly consumed in Asian at this point in time but that could grow over time such as feta and gorgonzola. Of the \$77 million in dairy products we exported to Korea last year, cheese sales tallied \$42 million. It is a major part of the Korean dairy market for U.S. exports and one that prominent focus was placed on during our FTA negotiations.

- Panama: The economic benefit to the U.S. dairy industry over the first several years of the Panama FTA, resulting from increased exports of cheese, whey and skim milk powder, among other dairy products, will be approximately an additional \$25 million per year on average and additional annual exports upon full implementation of the FTA will be approximately \$16 million. Of almost equal importance, SPS issues that previously hindered the dairy trade with Panama were resolved through FTA discussions.
- Colombia: Over the first several years of the agreement with Colombia, the expected economic benefit to the U.S. dairy industry is an additional \$25 million per year, on average, resulting from increased exports of cheese, whey and skim milk powder, among other dairy products and the additional annual exports upon full implementation of the FTA will be approximately \$23 million.

Additional export market opportunities are critical. The U.S. dairy industry applauds the Obama Administration's decision to advance these agreements that provide market access for U.S. dairy products.

- Trans-Pacific Partnership FTA: It is unfortunate that the current FTA exercise, the Trans-Pacific Partnership (TPP) does not at this stage involve markets that would offer similar (or even significant positive) export opportunities for the U.S. dairy industry and American agriculture as a whole. The vast majority of significant markets involved in the TPP FTA are ones with whom the U.S. already has an FTA. This is the case for Australia, Chile, Singapore and Peru. The remaining countries of New Zealand, Vietnam and Brunei offer scant export opportunities for our industry. If anything, this agreement therefore has the potential to undermine the gains made in some existing U.S. trade agreements such as with Peru by helping facilitate access by some of our largest competitors into that export destination market.

Expansion of the current TPP negotiating partners to include new and meaningful markets such as Japan and sizable portions of the Association of Southeast Asian Nations (ASEAN) is encouraged to ensure that meaningful export markets will be opened for the U.S. dairy industry. At this stage, however, that does not appear to be a near-term likelihood. That is particularly unfortunate given the negotiations other major dairy exports are involved in or have recently concluded with export markets of interest to the U.S. dairy industry such as ASEAN and China. Negotiations with meaningful markets, such as those listed in this paragraph, are critical to provide new U.S. dairy export opportunities. New access is essential to ensure that the U.S. industry can compete with other major dairy suppliers that are much more actively seeking FTAs.

- Doha Round of World Trade Organization Negotiations: The U.S. dairy industry maintains its strong support for concluding the Doha Round of World Trade Organization (WTO) negotiations on an ambitious basis, which would include deep tariff reductions in countries with high duties on dairy products in countries such as Canada and the European Union and the elimination of dairy export subsidies. However, a WTO agreement that does not address the current asymmetries in world dairy and disadvantages U.S. dairy should be opposed by the United States. Towards this end, it is critical for our industry that other major developed country dairy markets not be granted greater leeway to avoid difficult market access commitments than those

afforded to the U.S. We are prepared to accept expanded market access, including as part of a balanced package access into the U.S. market, but only if other countries and particularly major developed dairy countries do so as well to a comparable extent.

### 3. Preserve Existing Access and Allow It To Grow

- Mexico Trucking Situation: We must ensure that the United States is complying with its own trade obligations, particularly with major markets and strong allies such as our North American Free Trade Agreement (NAFTA) partner, Mexico. This is critically important as Mexico is the largest market for U.S. dairy exports. Despite depressed dairy prices and the global recession, dairy sales to Mexico last year totaled \$639 million and a record \$935 million in 2008. Sales in the first several months of this year indicate that exports have begun to rebound from their lower level last year. That promising outlook could be threatened if Mexico exercises its right to impose significant retaliatory tariffs on a wider range of U.S. exports due to continued U.S. incompliance with our NAFTA trucking access obligations. The U.S. must quickly move to resolve this challenging issue that is already negatively impacting overall U.S. exports and threatens to impose great harm on even more sectors of the U.S. economy.
- Geographical Indications (GIs): As alluded to above in the comments related to the U.S.-Korea FTA, GIs are another issue of critical importance. In light of the lack of movement in the Doha Round overall and successful U.S. efforts to date to keep at bay EU demands regarding expansion of protections for GIs, the European Union and some of its allies have begun pursuing an aggressive bilateral strategy to secure through FTA negotiations, bilateral Intellectual Property discussions, and other forums such as the Anti-Counterfeiting Trade Agreement (ACTA), what they have not to date been able to achieve in the WTO context on this issue.

The EU's goal is to advance their own commercial interests for food products through advocating for wider use of GIs, beyond the realm of appropriate protection of product niches in order to try to appropriate for their sole usage many cheese names that are commonly used around the world, including in international trade, and considered to be generic in the U.S. and many other major dairy countries. These names include such generally used names as Feta, Parmesan, Provolone and Romano, along with many others.

If successful, the Europeans' efforts will significantly impair current U.S. cheese exports and will also greatly limit the future global potential for the U.S. industry. The U.S. industry appreciates the attention the Administration has paid to this issue and stresses how critically important it is for the Administration and industry to work together in a very concerted manner to ensure that the customary use of common cheese names can continue in foreign markets.

U.S. cheese exports globally totaled \$430 million last year (down from a highpoint of \$570 million in 2008 when market conditions permitted greater U.S. participation in global dairy markets). The rate of growth over the last five years of full data (2004 to 2009) has been 117%. It is worth noting that even this impressive figure uses the 2009 sales data as its end point, which was a year of historically depressed prices and from which U.S. dairy exports have already begun to greatly rebound in 2010. Expectations for continued growth in cheese exports are extremely strong, particularly if we are able to resolve some of the SPS challenges that are hindering greater reliance on U.S. cheese exporters such as the health certificate negotiations with China.

#### **4. In Pursuit of Exports, Impact of Trade Decisions on Overall U.S. Dairy Industry is Paramount**

The U.S. dairy industry must be allowed to grow and prosper at home and abroad but the industry, as a whole, is threatened by the prospect that dairy trade could be expanded with New Zealand's dairy industry, a monopolistic power and the world's largest dairy exporter, in the context of the Trans-Pacific Partnership (TPP). Experience has shown that U.S. dairy farmers, and their processing sector, especially for cheese, butter and milk powders, will benefit when agreements are concluded with countries that represent export markets rather than our most sizable global competitors.

It is critical that all U.S.-New Zealand dairy trade be excluded from the TPP FTA. As detailed in NMPF's economic analysis provided to the USITC, there are severe anti-competitive practices at play in New Zealand that grossly distort the U.S.-New Zealand trading relationship, as well as New Zealand's ability to influence global dairy markets. Given this unfortunate and unique role that New Zealand's dairy industry enjoys, any expansion of dairy trade between the U.S. and New Zealand would impose considerable economic harm on U.S. dairy producers, as well as on many in the U.S. dairy processing sector.

NMPF and USDEC have been and remain strong supporters of balanced trade initiatives. Moreover, NMPF and USDEC are not opposed to the overall TPP FTA concept. Although, as cited above, we do not believe this is the most effective way to bring about expanded trading opportunities with the most significant Asian economies, the attempt to pursue new trade relationships in an area of the world where FTAs involving other countries are rapidly proliferating is supported.

The U.S. industry faces a unique anti-competitive situation in New Zealand. One company, Fonterra Co-operative Group Limited (Fonterra), controls 92% of the milk produced in that country. Also, as Fonterra boasts on its website: "[We are] the world's leading exporter of dairy products and responsible for more than a third of international dairy trade." Furthermore, this degree of global control reaches considerably higher levels when examining some of the core traded dairy commodities.

The negative impact of additional imports from New Zealand on the U.S. dairy industry would be tremendous. Estimates are that milk prices received by producers would drastically drop and gross revenues received by U.S. dairy farmers would plunge by a cumulative \$20 billion over the first 10 years of the FTA if U.S. dairy restrictions on exports from New Zealand are fully phased out in the TPP FTA. For these reasons, all U.S.-New Zealand dairy trade must be excluded from the TPP FTA.

Some additional factors are also of critical importance as well. We should not reopen the existing FTAs with the current TPP partners. However, future TPP partners where no degree of market access liberalization was achieved should be re-evaluated.

In achieving differentiated market access packages, an approach that maximizes the effectiveness of the agreement's ability to open markets for U.S. export priorities, it is critical to ensure that TPP countries or others around the world do not take advantage of these openings by simply shipping dairy ingredients into TPP countries with better market access packages or more advanced implementation schedules in order to take advantage of those opportunities not intended to be provided to these other countries at a particular point in time.

Without strict product-specific rules of origin such as those that have been contained in our other U.S. FTAs for dairy products and tariff lines containing notable amounts of dairy components, we merely close the door while opening a window. This type of sleight of hand is not tolerable and will only serve to undermine the U.S. dairy industry's confidence in the integrity of the agreements our government negotiates. Strict product-specific ROO have been critical to our industry's support of past FTAs. Their continued use to underpin the differentiated market access packages we should be pursuing with each TPP partner remains essential.

## 5. Continue and Expand Federal Programs That Support U.S. Exports Well:

- Market Access Program (MAP) and Foreign Market Development (FMD) Program: Because market promotion programs are permitted under World Trade Organization (WTO) rules, with no limit on public or producer funding, such programs are increasingly seen as a centerpiece of a winning strategy in the international trade battleground. Many competitor countries have announced ambitious trade goals and are shaping export programs to target promising growth markets and bring new companies into the export arena.

MAP has been tremendously successful and extremely cost-effective in helping maintain and expand U.S. dairy exports, protect and create American jobs, strengthen farm income and help to offset the government-supported advantages afforded foreign competitors. The FMD Program has also been successful in supporting important export programs.

A USDA study found that the increase in market development spending through MAP and FMD since 2002 has increased the annual value of U.S. agricultural exports by \$6.1 billion. For every additional \$1 expended by government and industry on market development during the 2002 - 2009 period, U.S. food and agricultural exports increased by \$35. That represents an astounding 35 to 1 return on investment. At the same time, the study also found that U.S. domestic farm support payments were reduced by roughly \$54 million annually due to higher prices from increased demand abroad, thus reducing the net cost of farm programs.

We strongly support the continued full funding of MAP at \$200 million and FMD at \$34.5 million for the life of the current Farm Bill and would encourage an effort to seek additional funds for both programs in the next Farm Bill to further spur export sales of U.S. dairy products and other agricultural goods.

- Dairy Export Incentive Program: The U.S. Congress established the Dairy Export Incentive Program (DEIP) to help build export markets for U.S. dairy products and attempt in some small way to work to counter the EU's massive export subsidy program for its dairy products. DEIP provides bonuses for limited quantities of cheese, nonfat dry milk (NFDM), and butterfat to assist in their export.

When appropriately used, this program serves as an essential leg of support to the U.S. dairy industry by countering massive export subsidies from Europe and the distorting influence on global prices arising at times of a glut of supply from those such as New Zealand that are pressed to dispose of product at almost any cost. Although extremely meaningful to the U.S. dairy industry, the amounts authorized for U.S. usage are very small quantities compared to the much larger amounts permitted to be made available to European dairy exporters.

Authorization of the DEIP is critical when export markets evaporate, as happened in February 2009 when, according to the USDA, U.S. dairy exports were 57% below those for the same month the year before. At the same time, farm milk prices were roughly half of what they had been the year before and input costs were historically high. When these types of situations occur, and taking into account activity by our major competitors including those with their own active export subsidy programs such as the EU, government support for U.S. dairy exports is essential.

That said, the U.S. dairy industry remains fully willing to eliminate its export subsidies provided that the EU does so in tandem with the U.S. Until such an agreement is extracted from the EU, however, the U.S. cannot afford to unilaterally disarm itself, particularly following a year such as 2009 when the need to counter European subsidies was made so clear.

## 6. Revise Federal Regulations That Impede Exports

- Agricultural Exports and Travel to Cuba: The estimated economic impact of the elimination of U.S. financial constraints on agricultural exports to Cuba and of allowing U.S. citizens to travel to Cuba would result in a growth of \$50 million a year in additional dairy exports to Cuba. NMPF and USDEC strongly support the Travel Restriction Reform & Export Enhancement Act, H.R. 4645, which would significantly improve the U.S. dairy industry's ability to expand its export sales. We also support the many similar Senate bills related to agricultural payment provisions and travel and hope that, following House approval of H.R. 4645, the Senate will act swiftly to advance companion legislation.

The agricultural trade payment provisions in the legislation are a key component in this, but so is the expansion of the right to travel to Cuba to all U.S. citizens. Eliminating these travel restrictions will have a direct and beneficial impact on U.S. agricultural sales by boosting food demand in the country. Travel by U.S. citizens will also increase the demand for higher value-added products such as cheeses.

To be clear, the U.S. dairy industry is not requesting that the embargo be lifted, but rather for the small steps to be taken of revising certain agricultural payment restrictions and returning to Americans their right to travel wherever they choose in the world, both of which would increase U.S. agriculture's competitiveness and export prospects in the Cuban market.

### In Conclusion

The international market is critical to the future growth and well being of the U.S. dairy industry. In the majority of cases, this presents the Administration with a large range of options for helping to expand U.S. dairy exports. We greatly appreciate the tremendous efforts that USTR, FAS and the regulatory staff at FDA, AMS and APHIS have devoted to working with us to try to address many of these trade issues listed above, particularly those that pose challenges to U.S. exports such as SPS barriers and GI regulations.

In limited circumstances, however, our concern for the negative impacts that an expansion of trade would have on America's hard-working dairy farmers and many dairy processors reliant on the high-quality milk and dairy ingredients made here at home demand that we pause and recognize that not every trade relationship with each foreign nation and within every sector of our economy is appropriate. It is this concern that drives NMPF and USDEC's vehement opposition to the expansion of U.S.-New Zealand dairy trade in the TPP. We should note that there have been very limited exclusions (typically only 1 or 2 sectors) in prior U.S. agreements which are now regarded as excellent overall trade deals. The perfect should not be made to be the enemy of the good is the lesson we should realize from these precedents.

#### Examples:

- Sugar was excluded from the U.S.-Australia FTA yet the vast majority of the U.S. agriculture and business sector believed that FTA to be a good agreement and supported its passage. That agreement was approved with strong margins of support in both the House and Senate.
- Most recently, rice was excluded from the U.S.-Korea FTA. We recognize that this was bitterly received by the U.S. rice sector and understandably so from their perspective. We also recognize, however, the degree of political sensitivity that Korea faced on this issue and that – we believe – would have absolutely precluded them from agreeing to any final FTA package that expanded rice access, even moderately. As the USITC has calculated, total U.S. exports to Korea would expand by \$9.7–10.9 billion under our agreement with Korea. Surely these dramatic benefits for so many sectors of the U.S. economy should not be denied solely because there was one sector that for Korea was intolerable to consider granting access for.

- We request that the Administration similarly address our deep concerns about the U.S.-New Zealand trading relationship by refusing to expand dairy trade with New Zealand in the TPP context. This is not a novel concept to U.S. FTA negotiations, nor one that has prevented us in the past from achieving deals that have been highly praised by the vast majority of U.S. business and agricultural interests.

We appreciate the opportunity to provide these comments as the Administration develops its National Export Initiative. If further information on any point is required, the appropriate contact person for these issues is Shawna Morris, Vice President of Trade Policy for both NMPF and USDEC ([smorris@nmpf.org](mailto:smorris@nmpf.org); (703) 294-4342). Thank you.