

**Rosario Palmieri**

*Vice President*

*Infrastructure, Legal and Regulatory Policy*

July 11, 2011

VIA ELECTRONIC MAIL

John D. Brewer, Administrator,  
Foreign Agricultural Service  
Office of Agreements and Scientific Affairs  
U.S. Department of Agriculture  
Stop 1040  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Re: **Guidelines for Eliminating Child and Forced Labor in  
Agricultural Supply Chains**

Dear Administrator Brewer:

On behalf of the National Association of Manufacturers (NAM) and the twelve million men and women working in manufacturing in the United States, I offer these comments on the Guidelines for Eliminating Child and Forced Labor in Agricultural Supply Chains.

The NAM opposes the use of child and forced labor and supports efforts to eliminate the abhorrent practices globally. The proposed guidelines, however, will neither accomplish that goal nor be thoughtfully tailored to complement current initiatives.

The Department's involvement in a "voluntary" certification or accreditation regime will ensure that the program is treated as if it were mandatory. Voluntary regimes are best left to non-government organizations and private sector participants. The details of such a program entail dramatically different expectations when governments act in this role. As a result, governments must be as sensitive to the impacts of voluntarily-imposed programs as mandatory ones. The current proposal does not demonstrate that sensitivity.

For these reasons, USDA should withdraw the current proposal and work to build upon already successful initiatives to eliminate the use of child and forced labor in imported agricultural products.

Sincerely,

