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Subject: Rule change comments
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Lloyd and team, Here are some additional comments about the rule change.

06/29/2023

The proposed changes: Current Rule: IDAPA 02.06.04 – Rules Governing Plant Exports Page 4, Subchapter A, Subsection 110.05 Rush Service.

General Comments on the overall rules changes

The proposed changes to the current rule will take most of the fee related language out of the rule and place it into Idaho State Department of Agriculture’s Annual Publication. The concern is this change will not allow industry and business to participate and provide feedback when fees are adjusted. We would recommend all fees stay within rules so business and industry will remain part of the formal processes to make changes.

One alternative to this would be the Idaho State Department of Agriculture creates a formal advisory board outlined in state statute to oversee the changes that will be implemented in the ISDA’s Annual Publication. This advisory board would be made up of business and industry representatives who would be affected by the changes in the Annual Publication. The Advisory Committee would have to approve any updates to the Annual Publication. This would be an alternate way to keep industry involved in the process of regulatory and fee changes.

Thanks,

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