



## **Eastern Border Transportation Coalition**

**EBTC Members are the Transportation Agencies of the U.S. States of Michigan, New York, Vermont and Maine and the Canadian Provinces of Ontario, Quebec, New Brunswick, Nova Scotia, and Newfoundland & Labrador**

Department of Agriculture  
Washington, D.C.

**RE: APHIS Agriculture Inspection and User Fees Along the U.S./Canada Border Docket # APHIS-2006-0096**

The Eastern Border Transportation Coalition (EBTC) is comprised of state and provincial agencies of transportation along the eastern Canada/U.S. border. The coalition is dedicated to the development of efficient north/south transportation corridors, including safe and secure border crossings, which are vital to the national, state and provincial economies.

Cross-border traffic between the States and Provinces in the EBTC's region accounts for almost 80% of the trips (commercial and passenger vehicles) between the United States and Canada. Approximately 85% of the total trade, by value, between the two nations also travels through our Ports of Entry.

Security and customs operations are obviously not the responsibility of state and provincial agencies of transportation. We totally understand that the Department of Agriculture must take measures to maintain security and food safety, as well as plant and animal health. However, our mission to maintain safety and fluidity on the road network is directly linked to border operations

which, in turn, can be impacted by Department of Agriculture policies and regulations when these are carried out at the land borders. Hence, we strongly believe that collaboration and communication are essential to minimize impacts of border operations and thereby ensure maximum security and fluidity at border crossings between United States and Canada.

The economic significance of efficient border flow make EBTC extremely concerned about the proposed increase in agriculture inspections and user fees (removal of exemption from inspection of fruits and vegetables from Canada) at the U.S./Canada border. We believe it will be disruptive to efficient flows at the Canada/U.S. border.

Specifically, EBTC offers the following comments:

1. Canada/U.S. trade is the largest bi-national trade relationship in the world with most of this trade being transported across the border by trucks. There are over 13 million cross border truck trips per year and any additional delay at the border will only add to the cost of goods. Studies have shown that the cost of this delay is over \$50 (US) per hour, so any further delay, such as those resulting from the proposed increased inspections and collection of fees, would have a negative effect on cross border trade
2. Canada and the United States have been cooperating in programs to increase both security and efficiency at the border. Programs such as FAST and C-TPAT help to ensure supply chain security, thereby lessening and not increasing, the need for inspections at the border. Rather than the proposed increased border agriculture inspections, EBTC suggests working in partnership with Canadian authorities to address the specific problems and identifiable risks.

Necessary inspections to ensure security and to prevent importation of agricultural pests and disease could then be conducted at points away from the border and thereby eliminate the potential effect on border crossing efficiency. This pre-emptive cooperation will also be beneficial in jointly addressing the risk of these pests and diseases.

3. Collection of additional fees at the border, presumably by Customs officers, would add an additional clerical function to the work of border officers who need to concentrate on risk assessment and security concerns. Collection of fees is not only time consuming but would require additional record keeping and financial controls.
4. The proposed fees will apply to all cross border movements of trucks, trains, aircraft, air passengers and marine vessels, of which most crossings have no relation to agricultural imports. Application of agriculture related user fees to non-users is unfair, inefficient and restricts trade.

EBTC is, therefore, very concerned that the proposed action to impose agriculture inspection fees and increase inspections at the border is contrary to all of the positive cooperation that is currently underway between Canada and the United States to jointly improve border security and efficiency. It appears to be a decision made in isolation by the Department of Agriculture without any consideration of related impacts on border activities and international commerce. We believe that these regulations could have a significant negative effect on border crossing efficiency, thereby increasing crossing delays.

EBTC strongly urges the Department of Agriculture to withdraw and rethink the interim rule. This reevaluation process should include consultation with importers and Canadian authorities to strategically address risk concerns and protect against unwanted pests and disease without impeding international trade flows.

A handwritten signature in black ink, appearing to read "Walter W. Steeves". The signature is fluid and cursive, with a prominent initial "W".

Walter W. Steeves  
Managing Consultant  
Eastern Border Transportation Coalition