



United States Department of Agriculture  
Animal and Plant Health Inspection Service  
Station 3A-03.8,  
4700 River Road Unit 118,  
Riverdale, MD 20737-1238

Submitted via: [Regulation.gov portal](#)

October 10, 2023

**RE: APHIS Seeks Comments on Proposal to Strengthen Agricultural Quarantine and Inspection Program**

On behalf of our members across the fresh fruit and vegetable supply chain, the Canadian Produce Marketing Association is pleased to offer comments to the Animal and Plant Health Inspection Service (APHIS) in relation to the Proposed Rule: *User Fees for Agricultural Quarantine and Inspection Services Program*.

**About CPMA**

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate, spanning the entire produce industry. The Association's members include major growers, shippers, packers and marketers; importers and exporters; transportation and logistics firms; brokers, distributors and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent over 830 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

**Comments**

CPMA recognizes that APHIS' Plant Protection and Quarantine (PPQ) department is responsible for developing and setting the Agricultural Quarantine and Inspection (AQI) user fee schedule and related regulatory policy, and that the AQI program has not revised its fees in eight years while costs have risen over time and events like the pandemic, changes in the size of conveyances, and global conflicts have impacted APHIS' AQI program. We also understand, as APHIS has stated, "The natural growth in demand for AQI services due to increases in international trade and cargo volumes increases the workload on existing staff. Full staffing at a level commensurate with existing and projected cargo volumes is critical to maintaining the health of U.S. agricultural markets."<sup>1</sup>

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<sup>1</sup> APHIS-2022-0023 RIN 0579-AE71, User Fees for Agricultural Quarantine and Inspection Services

At the same time, CPMA emphasizes that it is essential to strike a balance between the AQI program's financial requirements and the potential impact a fee increase may have on food affordability and security, especially for essential sectors such as the fresh produce industry, which plays a significant role in cross-border trade between Canada's and the United States' economies.

According to APHIS' consultation document, the fee increases in the proposed rule will address the Service's current staffing shortages, better enabling APHIS to improve inspection time at the border, which would result in smoother entry of compliant products and mitigate food spoilage at the border.<sup>2</sup>

CPMA members have indicated that, although they understand APHIS' need to revise their outdated fees in order to be consistent with current market demands and generate enough revenue to cover the costs of the AQI services provided, it is important for APHIS to acknowledge the financial burden the fresh produce industry has been facing in recent years with the pricing increase of fertilizers, packaging, labour, and other inputs, as well as extreme weather events that have significantly impacted the sector. Particularly in the current inflationary environment, it is critical that governments take all possible precautions to avoid contributing to further increases in the cost of food.

CPMA reiterates that any fee adjustments to the AQI program must balance the need to ensure sufficient resources to enable effective service delivery while also avoiding imposing undue financial burden on essential sectors of the U.S. and Canadian economies, such as the fresh produce industry. To this end, APHIS should maintain a transparent and well-documented rationale for any future user fee increases and should engage with impacted stakeholders prior to implementing them.

We thank you for taking the time to review our comments and would be pleased to answer any questions you may have.

Regards,

A handwritten signature in black ink, appearing to be 'RL', followed by a horizontal line extending to the right.

Ron Lemaire  
President  
Canadian Produce Marketing Association

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<sup>2</sup> Ibid