

Keith's Variety Store

Paul Casey, Owner
2 Cooke Point Road
Wilson's Beach, NB
Canada. E5E 1X8

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File

May 12, 2004

To: John Masewohl
Canadian Embassy
501 Pennsylvania Ave N.W.
Washington, D.C. 20001

RIN 0910 AC40

Cc: Docket Management Branch
Food & Drug Administration
5630 Fishers Lane Rm 1061
Rockville, Maryland 20852

Docket No 02 N 0276
FR 048516

Subject: FDA - USDA - Bioterrorism Rules for Transporting meat and food stuffs through the US and how it impacts us here on Campobello Island, NB, Canada.

Dear Sir,

A little history about our store and how it works when it comes to getting goods. We have for the past 12 years traveled rain or shine from Campobello Island to Saint John, NB, Canada to pick up our stock and return on the same day. It takes about 12 hours to do the entire run. We have always been bonded at the US Border at Calais, Maine. The truck was then inspected and sent on its way to Campobello Island.

How the rules impact us. Prior Notice - This is very time consuming, we have 1000 items that have to be looked up on the FDA website to find FDA codes for, and then the company names, addresses and zip codes or postal codes for each item must all be entered. Some times there is just one of a particular item, and not a case, that we may be transporting. On average there are 600 items per week, that is 600 individual pieces of paper at 1cent a sheet, this is a \$6.00 beginning cost. The person doing the Prior Notice charges \$2.50 at least per item, this is approximately \$1500.00 a week. This is additional to the existing cost of transit through Maine with our Goods: \$100.00 annually for the decal and the cost of US Customs and Border Patrol processing the bond and the cost of the bond itself. As far as I can see these costs cannot be passed on to the consumer. We are just a Mom and Pop operation and it is definitely not cost effective and is time consuming, not only to us, but to the Customs and Border Patrol agents as well.

The whole concept of the FDA Prior Notice is to regulate all imported foods. We appreciate that food supplies need to be safe-guarded in these troubled times. However because of our geographical location, a Canadian community separated from the rest of Canada by the state of Maine, it raises other issues. It does not address the instances where the goods are being transported through, not imported into the US. Maine highways are the only land route as well as the only permanent route connecting our island to mainland Canada. Campobello Island has always had very strong ties to the US, not only because we depend on Maine for many reasons, but also because a lot of our residents are American-born. It also seems appropriate to add that for many years we have proudly been President Franklin D Roosevelt's "Beloved Island."

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● Page 2

May 12, 2004

How to solve this problem?

Shipments bound for Campobello Island would continue using the in-bond as before with the permits issued to ship beef and beef products, invoices from the wholesale outlets and other suppliers, but the trucks would be inspected and sealed in St Stephen, NB, Canada by Canada Customs officers. This seal would then be checked by Customs and Border Patrol agents in Lubec, Maine, the last Maine port before Campobello Island, to see that it is in good order. A copy of the in-bond could then be faxed back to Calais Customs and Border Patrol so the agents there would know that the shipment has successfully left the US. This would be a cost effective and simple method of regulating food transport where importation laws aren't truly necessary.

Thank you for your time.

Very Respectfully,



Paul Casey