

La Fédération des producteurs maraîchers du Québec (FPMQ) est une organisation démocratique qui représente et défend les intérêts des producteurs, appuie la recherche et le développement technologique, facilite l'accès aux marchés et fait la promotion des productions maraîchères et de petits fruits.

La FPMQ est également une association qui coopère au développement du secteur maraîcher avec, entre autres :

- le Conseil canadien de l'horticulture (CCH)
- le Conseil québécois de l'horticulture (CQH)
- le comité consultatif du CRDH St-Jean-sur-Richelieu
- la Table filière maraîchère et de petits fruits (MAPAQ)
- l'Union des producteurs agricoles du Québec (UPA)
- le Conseil des productions végétales (CPVQ)
- Gestion-Qualité Fruits et légumes Inc. (GQFL)
- Agri-Travail
- l'Institut québécois des ressources humaines en horticulture (IQRHH)
- Phytodata

Activités et services :

- Paiements anticipés
- Info-Prix Fruits et Légumes
- La Semaine Horticole
- Éditeur de PRIMEURS, le média de l'actualité maraîchère au Québec

Fédération
des producteurs
maraîchers du Québec

1505 '03 APR -2 19:09

March 28, 2003

Dockets management branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

ATTN : Docket No. 02N-0278

The Quebec Federation of market-gardener producers (Fédération des producteurs maraîchers du Québec) would like to emphasize its concern regarding the project law stemming from the Public Health Security and Bio-terrorism Preparedness and Response Act of 2002.

The market-gardening industry of Quebec depends on farm sales of about \$200 million (of fresh fruits and vegetables), of which close to 40 percent represents the value of exported goods. The proximity of the markets, as well as the value of the dollar, are non-negligible assets which also benefit your consumers through the unequalled freshness of the products and competitive prices.

However, in order to respond to "just in time" in a secure way, the industry needs more flexibility because it is a matter of fresh and perishable products which are subjected to climatic risks. Therefore these products are not standardized in size, diameter, weight, etc.

We wish that some particular measures can be elaborated, in partnership, in the context of a bilateral agreement, in order to assure that the fresh fruits and vegetables can be safely transported between Canada and the U.S. The procedures arrived at should be applied both ways, taking into account the particular nature of perishable products and the industry of truck transportation.

However, if such an agreement cannot be drawn up, the preparing of the regulations must enable one to consider the practices of the industry.

Our remarks therefore concern only the prior notice which:

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- Should be furnished by the exporter with proof of support (the order coupon) because he's the one who has all the information;

- Should be submitted at the latest eight hours before the arrival of the shipment because this delay is common in this industry, given the distances at stake. Close to 50 percent of the total areas cultivated in the Quebec market-gardener sector is situated in the Montérégie region, in a radius varying from 15 minutes to one hour in distance from the U.S. border. In addition, this

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region is cultivated in order of importance; sweet corn, lettuce, carrots, as well as onions and cabbage. It therefore consists of the driving forces of all our exports.

- The amendment of the advance notice should thus be able to contain the possibility of identifying the product, the quantities and the brand names in a shorter period of time, one hour before the arrival of the shipment.

- Should be able to offer the possibility of passing through selected border stations which would suppress the obligation to determine with precision the hour of passing through customs (declaration to the customs agent at the chosen station).

Hoping these comments will be able to be taken into consideration, please accept our warmest regards.

Louise Tardy,
Director general

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