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Cuddy Farms, 28429 Centre Road, R.R. #5, Strathroy, Ontario N7G 3H6

(519) 245-1592 Fax: (519) 245-5916  
<http://www.cuddyfarms.com>

December 8, 1999

FSIS Docket Clerk,  
Docket **99-045P**  
US Dept. of Agriculture, Room 102  
Cotton Annex, **300** 12th St. SW  
Washington DC 20250

99-045P-1  
Peter Gazdzinski

Dear Sir or Madam:

We have been notified by our customs brokerage firm, Tower Group International, **of** your intended rate increases for meat and poultry inspection fees effective 02-Jan-00, with a further increase scheduled for 01-Oct-00.

As our firm currently pays a substantial amount of dollars each and every year for inspection fees on exports, any increase we incur will result in a direct profit loss for our company. Unfortunately it is very difficult to increase the cost of goods to our customer based on a government fee increase. With each fee increase, and ultimate decrease in profit, we may be forced to decrease the number **of** export shipments, and ultimately decrease the number **of** inspections required by **your** port veterinarians.

We also question the fee increase on the basis on inspections. It is our understanding that NAFTA and FTA agreements were designed to lower tariffs and trade barriers between Canada and USA. These intended fee increases do not make it easier and less expensive **for** exporters.

For imports into Canada, a physical inspection of hatching eggs and day-old poult is not required due to the fact that the USDA veterinarian who inspects the flocks and hatches actually attests to the health status of the shipment via the health certificate that accompanies the shipment.

Yet for imports into the USA, a physical inspection is still required at the port of entry—we would question why. This port veterinarian does not and can not physically attest to the health status **of** the shipment by a mere visual inspection. Canadian Food Inspection Agency does certify the health standards of our flocks by a meticulous inspection and testing. Moreover, we have on staff an accredited veterinarian who attest the health status

of parent flocks and each shipment. We question why a physical inspection for hatching eggs and day-old poults is required into the **USA** when a such inspection is not required into Canada – if the proper documentation accompanies the shipment.

The contents of the health certificates that accompany each shipment are negotiated by the federal levels of both the **US** and Canadian government officials to satisfy both the import and export regulations of each country. The port veterinarians are not involved in this negotiation process, nor are they physically able to verify health status of any given shipment.

**Thank** you for your time and attention to this matter. If you feel it necessary, our on staff Canadian Food Inspection Agency accredited veterinarian would be happy to further discuss this matter **of** testing and regulations.

**We** await further notification from you or via our customs broker of your decision regarding port veterinarian rate increases.

Yours truly,



Dip. ACPV

**PETER WAJZINSKI, DVM, Ph.D., Dip.Path.,**  
Cuddy Farms, Canada

CC: Dr. Gilles Dulac  
International Trade Team  
Canadian Food Inspection Agency  
**59** Camelot Drive  
Nepean, Ontario K1A 0Y9