



**MARITIME EXCHANGE**  
for the Delaware River and Bay  
*Leading the Way to Port Progress*

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March 29, 2007

The Honorable Dr. Andrew von Eschenbach  
Food & Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857

**RE: Consolidation of Import Document Review & Labs**

Dear Commissioner von Eschenbach:

It is our understanding that the FDA is considering consolidation of Import Entry Review & Laboratories. The purpose of this letter is to express our opposition to such a plan, for the reasons cited below.

As you may be aware, the Maritime Exchange for the Delaware River and Bay is a non-profit trade association representing the interests of port and related businesses in Southeastern Pennsylvania, Southern New Jersey, and Delaware. The proposed consolidation would not only harm the Delaware River maritime community, but the potential loss of experienced FDA personnel knowledgeable about the ever-important fresh fruit cargoes as well as the pharmaceutical and retail cargoes that move through our regional port.

The Delaware River international trade community has worked diligently to provide an environment that not only accommodates trade needs, but prides itself in partnering with government agencies, including the Food and Drug Administration, Customs and Border Protection, Coast Guard and the many other government agencies responsible for regulating this industry. Simply stated, the loss of FDA as a local partner will create a distinct competitive disadvantage for this port business community.

The Delaware River regional port complex and its customers depend on local FDA staff to provide quick and accurate responses. We believe this consolidation will cause unnecessary delays in FDA's processing pipeline, possibly exposing the public to health and safety risks. Further, such delays will dramatically impede maritime commerce in the region, such as increased storage charges at piers or deterioration of product. Overall, costs at Delaware River ports will increase and shippers and importers will seek other U.S. destinations, and importers who experience financial losses will either pass these costs to consumers and/or seek other U.S. port destinations.

We trust that FDA will review this decision and conclude that the consolidation plan is not a viable option.

Thank you for your review of this matter, and please feel free to contact me if you have any questions or would like additional information.

Sincerely,

Dennis Rochford  
President