

Philadelphia Customs Brokers & Forwarders Association

February 12, 2007

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

RE: Consolidation of Import Document Review & Labs

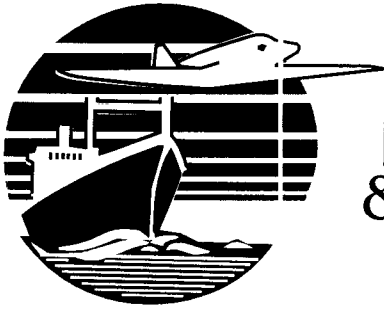
Honorable Commissioner:

We have recently been informed that the Food & Drug Administration (FDA) is contemplating the consolidation of Import Entry Review & Laboratories. This plan would have a devastating impact on importers to lose local experienced FDA personnel, who are familiar with the product, shippers, manufacturers, growers, etc in the Ports of the Philadelphia Region.

The international trade community in the **Port of Philadelphia** and the surrounding region has worked diligently to provide a port that can accommodate the needs of that community and prides itself in partnering with the government agencies such as FDA and Customs & Border Protection (CBP) that regulate this business. The lack of FDA being a local partner will put Philadelphia at a competitive disadvantage to cities with a local FDA Import Document Review & Labs.

The Port of Philadelphia has historically been a major gateway for produce & pharmaceuticals. We depend on the ability to receive quick and accurate responses from the local FDA staff. Without local FDA personnel to support our community, I am gravely concerned with the viability of Philadelphia to remain a gateway for these products.

Further, we have a financial impact to the companies and consumers in the Region. Any delays **will** cause storage charges at piers, container stations and airlines, or worse yet the product could deteriorate in condition or market value. Importers that experience



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financial losses will need to raise their prices. These issues will have a negative impact on the consumer when shopping for their family.

Though all of the above alone provides enough reason not to consolidate FDA operations, we must put the health and safety of the public first. This “**consolidation plan**” will cause unnecessary delays in FDA’s processing pipeline which could expose our fellow citizens to additional health and safety risk. I know this is not the intention of FDA but it is a very real concern and there is no financial savings by FDA big enough to justify this risk.

We trust that FDA will review their decision and come to the same conclusion as ourselves that the “**consolidation plan**” is not a viable option.

Thank you for your time and attention to this matter.

Respectfully yours,