



Canadian International Freight Forwarders Association, Inc.
Association Des Transitaires Internationaux Canadiens, Inc.

Via e-mail to: tradereltations@customs.treas.gov

January 28, 2003

US Customs Service

Trade Relations
Washington, DC

Subject: Comments of the Canadian International Freight Forwarders Association Inc. (CIFFA) to Proposals by the U.S. Customs Service in respect to the Development of Regulations Regarding Mandatory Advanced Collection of Electronic Information - Air Cargo

Introduction

The Canadian International Freight Forwarders Association Inc. (CIFFA) represents the Canadian freight forwarding industry since 1948. Its membership includes 151 corporate members, all actively engaged in International Freight Forwarding, as well as a plethora of associate members largely composed of suppliers to the industry such as carrier, insurance companies, legal services etc.

CIFFA appreciates the opportunity to comment on the USCS proposed Mandatory Advance Electronic Information for Air Cargo that was submitted at the January 14, 2003 public meeting.

General Comments

Canada being the largest trading partner with the United States of America, CIFFA considers it important to bring forward comments specifically in regards to trans- border transport and trade.

Due to the volume of trade and the similarities in culture, there is a long history of exceptional cooperation and innovative programs to facilitate the movement of persons and goods between our two countries. Witness, for example, the just recently published 30-Point Action Plan by the Coalition for a secure and trade efficient border of which CIFFA is a member. Details of the plan can be accessed as follows: <http://www.ciffa.com/news/010803-01.asp>

It is in this same spirit that CIFFA has carefully reviewed your proposals and must admit to serious concerns that without some modifications, the proposed regulations could cause grave operational difficulties for all parties involved in Canada / US trade. As well as those utilizing the United States as a gateway for receiving goods from abroad or shipping overseas via US airports.



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Recommendations

With regards to security and safety issues, we would very much like to see a fully coordinated bilateral and uniform policy that covers the whole territory of the USA and Canada. In other words, shipments originating in either the United States or Canada should be treated as domestic movements. Programs in regards to Known Shipper, Security Training, Security Awareness, as examples, should be synchronized, affording both Americans and Canadians a continent wide security perimeter analogous to the program advocated by the Coalition's 30-Point Action Plan for a secure and trade efficient border.

The US Customs Service's proposal calls for separate inbound and outbound systems for the United States. As Canada is presently re-engineering their cargo reporting systems in response to enhanced security considerations, CIFFA believes that there would be great merit in harmonizing the two programs.

Conclusions

CIFFA sincerely appreciates the efforts made by US Customs Service to seek input and feedback on the proposed regulatory measures. And we thank you for your offer to work closely with the transportation industry. In this context, please do take note that we fully endorse the submission by FIATA of which CIFFA is a member association. It is indeed through such dialogue that we can ensure that systems are designed to meet our new security and regulatory needs and yet retain utmost possible simplicity and efficiency in trade.

CIFFA is certainly prepared to carry on with this dialogue and hope that at its conclusion, we will have designed a new system for cargo reporting that does in fact enhance security and facilitate the movement of goods.

Respectfully submitted,

CIFFA – Canadian International Freight Forwarders Association Inc.

Hj Kuhn

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