

APHIS 2022-0023

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I am commenting on raising the user fees (APHIS 2022-0023) for Customs and Border Protection Agriculture Specialist based at US Customs and Border Ports of Entry across the United States and Pre-Clearance CBP staffed ports. I have been a CBP Officer for many years and have worked with CBP Ag Specialist for many years and report the following.

Customs and Border Protection Agriculture Specialist do not take their job seriously. On regulated items shipped to the United States Ag Specialist only look at the paperwork to make sure the permit is still valid. Not once have I ever seen them inspect the shipment (even with a safe platform to inspect from). Ag Specialist stay in their office most of the day. When an officer is looking for them more often than not, they will not respond either by radio or by phone. Trucks sit for hours while CBP Officers try to contact other CBP Ag Specialist at other ports of entry for clearance. If an Ag officer cannot be contacted the shipment is returned to Canada (even though the Ag officer is inside and will not respond. I have seen CBP Ag in our lobby and an Ag inspection called on the radio and CBP Ag wouldn't get up for the inspection. The officer purposely walked by the CBP Ag with the Agriculture items and no response. CBP Ag does not work or help out on any vehicle, plane, train inspections or truck inspections. The only items CBP Ag look at is stuff they have to and just paperwork at that.

Small ports CBP Ag only get 6 shipment a month and that's about all they do. Nothing else. CBP Ag get the same pay as a CBP Officer and are lucky if they do 5% of the work as an officer. They are mostly plain lazy. CBP Officer have asked for help with one thing or another and CBP Ag say it's out of their job classification (even moving a car that was deemed safe).

I have seen where a regulated item has arrived at a Port of Entry and the Ag Officer was off for the day. Another port was contacted and stated the regulated shipment needed to return to Canada and arrive at a CBP Ag staffed port. The carrier was extremely upset because that was about 60 miles further. I have also seen for that same item CBP Ag look at the paperwork and release it.

CBP Officers are required to work primary, secondary, x-ray, etc. and have a fully scheduled day. Ag Specialist I have seen work about ½ hour per day on a busy day. CBP Ag Specialist do not work primary, secondary most never inspect planes, trains, vessels, trucks cars, campers. What are they there for just the regulated stuff. I think not.

Before 2002 most Ports of Entry did not have Agriculture Specialist. The US Customs Service Inspectors conducted Agriculture inspections. If there was an issue the goods were returned to Canada/ Mexico for fumigation. CBP officers today enforce laws for ATF, DEA, FDA, EPA and many more Federal Government agencies. We do not need CBP Agriculture. For one many of the same pest in Canada/Mexico are in the USA as well. The Canadian government especially is very trustworthy as far as Phytosanitary Certificates and export Permits.

I noticed in the article on APHIS 2022-0023 the AQI program is 166 million deficit. I can certainly see why. When the CBP Ag position first came out there was one Ag Specialist for the area Port (for questions and area port inspections only). Now there are ports like Champlain NY with 13 Ag Specialist and 4 supervisors and one Chief for about 60 regulated items per Monday - Friday. Alexandria Bay NY 8 Ag and one supervisor for 40 regulated shipments per day. Massena 1 and Ogdensburg NY 1 for about 6 regulated shipments per month. Way overstaffed; it takes about 5 minutes to clear most regulated shipments. Please take a look on how many of these shipments are actually looked at. Probably none. So far all CBP Ag has found on a daily basis is a chair. I will recommend a severe RIF (reduction in force) I will also report my findings to congress to please not fund CBP Ag positions or other USDA Ag positions. Furthermore, to have the Government Accounting office investigate the incompetence waste fraud and abuse/mismanagement though out CBP Agriculture. Please look at your STATS per Ag Officer and you will clearly see what I mean. Do we really need an Ag inspector to take an orange etc. from the traveling public when a CBP Officer can do the same job. I think not. Thank you