Mr. James P. DeHart
U.S. Consul General
Consulate General of the United States
1075 West Pender St.
Vancouver, British Columbia V6E 2M6

March 18, 2024

Re: USDA Agriculture Inspection Fees on Small Aircrafts

Dear Consul General DeHart,

On behalf of the Tourism Industry Association of BC (TIABC), I am writing to appeal for your assistance in resolving an urgent matter that has the potential to negatively impact British Columbia's tourism sector, particularly in Greater Victoria and Metro Vancouver.

As you are aware, the United States Department of Agriculture's (USDA) Animal and Plant Health Inspection Service is looking to impose new inspection fees on commercial airlines entering the country. Historically, smaller aircraft of 64 seats or less have been exempt from this fee given they typically pose no phytosanitary risk or inspection burden, specifically planes with a maximum of 16 seats as is the case for operators in B.C. Moreover, these short-haul, cross-border flights occur over small geographic areas that are ecologically identical and primarily carry visitors and business travelers, not cargo or perishable goods.

To that end, passengers and bags are already screened and checked by US Customs and Border Patrol Agents with fees applied within the cost of an airline ticket. It should be noted that no agriculture inspection fees apply for flights entering Canada.

The imposition of the new fee (starting at $288 and increasing to $373 per flight by 2028) on international carriers using smaller aircrafts (e.g. Cessna Caravan) will have exponentially more impact than on larger carriers (e.g. Boeing 787 Dreamliner) given the distribution of costs amongst few passengers versus several hundred. Clearly, small carriers will be forced to pass along the additional cost to passengers who will pay significantly more per flight, which has the potential to deter visitors, affect local visitor economies, and seriously harm the viability of small operators who provide a valuable service in the Pacific Northwest and elsewhere.

Regrettably, smaller carriers most impacted by this new regulation were not engaged in the initial consultation period yet the proposed fee has now been submitted to the US Office of Management and Budget (OMB) for approval and implementation.

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We have also been told that the proposed fee is not supported by and will negatively affect the Puyallup Tribe, which recently invested more than $150,000 in a terminal and customs facility near Tacoma, in partnership with Kenmore Air, to begin service to and from Victoria to build Indigenous tourism in Washingston State. The Puyallup Tribe was also not consulted on this new fee.

It is our hope to have the USDA re-open the public comment period so input by small carriers can be fully considered, ultimately leading to a further exemption for aircraft with 16 or fewer seats. It's also important to note that the request for a 30-day re-opening of the public comment period has the rare, bi-partisan, bi-coastal support from high-ranking members of the US Congress and Senate, including, among others, Washington State Senators Maria Cantwell and Patty Murray, and Florida Senators Rick Scott and Marco Rubio. Your assistance on helping to resolve the issue would be most welcome and appreciated. For your information, we have also reached out to Ambassador Cohen in Ottawa.

Consul General, thank you for your attention to this matter and for your support of Washington State and British Columbia's tourism sector. If you have any questions, please contact TIABC at your earliest convenience.

Best Regards,



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