

We repeat the exercise outlined above in table 5 for Canada, as shown in table 6. Again, until FDA acquires updated information, we will assume that Canadian produce growers use business practices that are similar to those used by Mexican growers. FDA solicits comments on this assumption. While FDA acknowledges that their business practices may be different in some ways,

it is possible that Canadian produce growers will also have to adjust business practices so that submitters can comply with the prior notice requirement. We seek comment on this issue.

As with the Mexican produce, only Canadian produce that is highly or very highly perishable and did not fall under the purview of the Agricultural

Marketing Agreement Act is included in table 6.

We again calculate the 2.4 percent loss in product value due to the importer having to resubmit prior notice for 20 percent of the Canadian imported fresh produce. This loss in product value due to the 4-hour wait time totals \$1,928,765.

TABLE 6.—FRESH PRODUCE IMPORTED FROM CANADA

Perishable Produce from Canada	Total Volume for 2001 (100,000 lb units)	Current Wholesale Price per lb. (Sept. 2002)	Total Revenues Wholesale
Peppers	753	0.30	22,590,000
Cucumbers	627	0.145	9,091,500
Blueberries	401	1.42	56,942,000
Mushrooms	373	1.55	57,815,000
Lettuce-Other	243	0.50	12,150,000
Raspberries	89	2.78	24,742,000
Broccoli	88	0.72	6,336,000
Cherries	37	1.30	4,810,000
Sweet Corn	36	0.22	792,000
Squash	27	0.17	459,000
Spinach	24	1.30	3,120,000
Radishes	11	0.50	550,000
Endive	9	0.17	153,000
Beans	7	0.50	350,000
Strawberries	5	0.575	287,500
Pears	4	0.39	156,000
Green Peas	3	1.60	480,000
Greens	2	0.30	60,000
Eggplant	1	0.29	29,000
Wholesale Value			\$200,913,000
Retail Value			\$401,826,000
2.4% reduction in value for 20% of the products			\$1,928,765

We used the same logic for seafood as we did for produce to account for the possibility of having to resubmit prior notice, i.e., a change in the quantity of seafood in the shipment made after the original notice was submitted, less than 4 hours before scheduled entry. We will use the reduction in the value of perishable imported seafood to account for the cost of a wait at the border while prior notice is resubmitted.

We used information from the annual imported seafood statistics published by the National Marine Fisheries Service (Ref. 8) to estimate the weight and wholesale value in dollars of all fresh, perishable seafood products imported from Mexico and Canada. As we did for fresh produce, we mark-up the wholesale price of the fresh seafood by 100 percent (Ref. 9) to represent the retail value of the products. Then, assuming that perishable seafood will

keep for 2 days in a consumer's refrigerator, (Ref. 10) we find that an 4-hour delay in delivery time caused by the prior notice requirement for 20 percent of the products results in a 8.3 percent loss in that seafood's value (4 hours out of 48 hours). Table 7 shows that the lost time results in a \$1,863,805 loss on the value of Mexican fresh seafood imports. FDA requests comment on the perishability of the seafood used in tables 7 and 8.