

**Analysis of  
Detentions  
of Food Products  
Imported from  
Selected Asian  
Countries into  
the United States  
and Japan**

*Analytical Report No. 11*



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# **Analysis of Detentions of Food Products Imported from Selected Asian Countries into the United States and Japan**

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## PREFACE

This report supplements the lengthier Regional Agribusiness Project (RAP) Analytical Report #10, "Environmental, Food Quality, and Food Safety Issues Affecting Agribusiness in Selected Asian Countries," August 1995. That report examined impediments to trade that emerged from extensive interviews with public and private sector entities from both the RAP-supported countries (exporters) and from their primary target market countries (importers). Whereas RAP Analytical Report #10 was highly narrative in nature, the following report presents select import detention statistics acquired exclusively from the importing countries themselves. For various reasons (primarily availability of data), not all the key RAP country target markets could be included in the analysis. And because data are collected in very different ways in different countries, any type of rigorous statistical analysis among the selected countries was ruled out. This report presents hard data but must rely heavily on the examination of trends to draw conclusions and recommendations.

As far as we know, this is the first report ever to compare and contrast import detention statistics for target markets of an Asian agribusiness project supported by the U.S. Agency for International Development. Although these statistics are important in establishing remedial programs to improve export quality, it must be noted that high-priority export quality problems may exist in a given country that are NOT indicated by a revealing detention statistic. This is because most importing countries have limited ability to test incoming product — much can get through without detection of major quality or safety defects. Therefore, statistics aside, narrative discussions with importers are also extremely helpful in describing the realities of export quality from one exporter to another. For those seriously interested in learning the true export quality and safety status of the RAP-supported countries, we recommend reading this report along with RAP Analytical Report #10.

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## TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	vii
INTRODUCTION	1
METHODOLOGY	3
U.S. DETENTIONS	3
JAPANESE DETENTIONS	5
NORMALIZATION AND COMPARATIVE ANALYSIS	5
RESULTS AND DISCUSSION	7
U.S. FDA IMPORT DETENTIONS	7
Total Import Detentions (1992-1994)	7
Import Detentions by Food Product Category (1992-1994)	7
Total Importation by Food Product Category	8
Normalization	8
Reasons for Detentions	9
Comparison of Products Detained versus Products Imported	10
FOOD IMPORT VIOLATIONS IN JAPAN	11
Food Import Violations (1992-1993)	11
Import Violations by Product Category (1992-1993)	11
Reasons for Violations	12
SUMMARY AND RECOMMENDATIONS	13

## LIST OF TABLES

	<u>Page</u>
Table 1. Total U.S. FDA Food Import Detentions for RAP Countries, Japan, and Mexico: Fiscal Years 1992, 1993, 1994	17
Table 2A. Shipments (by Product Category) from RAP Countries, Japan, and Mexico Detained by the U.S. FDA: Fiscal Year 1992	18
Table 2B. Shipments (by Product Category) from RAP Countries, Japan, and Mexico Detained by the U.S. FDA: Fiscal Year 1993	19
Table 2C. Shipments (by Product Category) from RAP Countries, Japan, and Mexico Detained by the U.S. FDA: Fiscal Year 1994	20
Table 3A. Amount of Foods Imported into the U.S., by Product Category from RAP Countries, Japan and Mexico: 1992	21
Table 3B. Value of Foods Imported into the U.S., by Product Category from RAP Countries, Japan and Mexico: 1992	22
Table 3C. Amount of Foods Imported into the U.S., by Product Category from RAP Countries, Japan and Mexico: 1993	23
Table 3D. Value of Foods Imported into the U.S., by Product Category from RAP Countries, Japan and Mexico: 1993	24
Table 4A. Number of Detentions per Kilogram of Food Imported into the U.S. from RAP Countries, Japan and Mexico: 1992	25
Table 4B. Number of Detentions per Million Dollars of Food Imported into the U.S. from RAP Countries, Japan and Mexico: 1992	26
Table 4C. Number of Detentions per Kilogram of Food Imported into the U.S. from RAP Countries, Japan and Mexico: 1993	27
Table 4D. Number of Detentions per Million Dollars of Food Imported into the U.S. from RAP Countries, Japan and Mexico: 1993	28

**LIST OF TABLES (cont'd)**

	<u>Page</u>
Table 5A. Reasons for Detention of Shipments from RAP Countries, Japan and Mexico: Fiscal Year 1992	29
Table 5B. Reasons for Detention of Shipments from RAP Countries, Japan and Mexico: Fiscal Year 1993	30
Table 5C. Reasons for Detention of Shipments from RAP Countries, Japan and Mexico: Fiscal Year 1994	31
Table 6. Comparison of Primary Detentions versus Primary Imports into the U.S. for RAP Countries	32
Table 7A. Relationship Between Food Import Amounts and Levels of Violation for Foods Imported into Japan from RAP Countries: 1992	33
Table 7B. Number and Weight of Food Import Violations from RAP Countries into Japan: 1993	34
Table 8A. Weight of Detentions of Food Imported into Japan from RAP Countries by Product Type: 1992	35
Table 8B. Weight of Detentions of Food Imported into Japan from RAP Countries by Product Type: 1993	36
Table 9A. Number of Detentions of Food Imported into Japan from RAP Countries by Detention Reason: 1992	37
Table 9B. Number of Detentions of Food Imported into Japan from RAP Countries by Detention Reason: 1993	38

## EXECUTIVE SUMMARY

An assessment of the causes for the detention of food products at import is a useful means of learning about production problems in manufacturing countries. This report analyzes, by product and by detention reason, the causes for product rejection upon import for food products exported from Asian countries into the United States and Japan from 1992 to 1994. The exporting countries — Bangladesh, India, Indonesia, the Philippines, and Sri Lanka — are served by the Regional Agribusiness Project (RAP) of the U.S. Agency for International Development.

Consistently, shipments of fresh and processed seafood accounted for the majority of detentions from these countries. Cocoa beans were a major commodity detained from Indonesia. Beyond these two products, commodities that were detained included processed fruits and vegetables, grains and related products, and spices.

Although all countries reported significant import problems, the Philippines had the most detentions per unit volume of exported product, indicating major difficulties in food production there.

The primary causes for product detention were excessive filth, excessive bacteria, decomposition, and spoilage. Lack of understanding of good manufacturing practices (especially the failure to file proper thermal process information), improper product labelling, improper food additive usage, and excessive antibiotic residues in seafood were also significant reasons for product failure at import.

Interestingly, the presence of excessive pesticide residues was not a major reason for product rejection. However, commodities on which pesticides are used extensively (for example, leafy green vegetables) are not major imports into either the United States or Japan from RAP-supported countries. The absence of excessive pesticide residues as a cause for product rejection should not be interpreted as a lack of pesticide misuse problems in RAP countries.

RAP country food processors, exporters, and government trade and regulatory organizations are clearly aware of these import detention issues. This report reflects findings from visits undertaken by RAP Environmental Team members in RAP countries and to major RAP target export countries. The report presents suggested priorities for RAP to assist in the remediation of the causes for detention of major RAP country export food commodities.

## INTRODUCTION

A review of the reasons for the detention of imported products can be a useful tool for assessing production problems in the manufacturing countries. For food products, the food safety and quality problems causing rejection of a product at import can be a guide to the growing and manufacturing difficulties within the exporting country. This assessment is particularly useful for countries served by the Regional Agribusiness Project (RAP) of the U.S. Agency for International Development, because in these countries domestic food safety and quality assessment programs are limited.<sup>1</sup>

In assessing the status of food imports, a preferred approach is an analysis of the quantity of specific food products imported into a given country combined with a knowledge of the:

- Amount of imported food actually inspected by product type;
- Tests conducted on each product inspected;
- Reason(s) for rejecting a product; and
- Rationale used by the inspecting authority for sampling and testing product (such as random sampling, focused sampling on problem product, or a combination of both).

Unfortunately, no major importer of RAP country products maintains an ideal set of food import records. The United States and Japan provide the best information; European countries, South Korea, Hong Kong, and Singapore have less complete information. Countries in the Middle East and those comprising the New Independent States (NIS) have the least reliable information.

The United States Food and Drug Administration (FDA) provides information by fiscal year on the number of detentions by product type by country; it also specifies the reason for each detention. The FDA does not, however, record the amount of detained product or make clear whether the detention resulted from routine sampling or from an automatic detention or other problem situation; this makes intercountry comparisons difficult.

The Japanese Ministry of Health and Welfare (MHW) tabulates the amount of product detained by product type, by country, and by detention reason(s). MHW does not relate this information, however, to the total amount of imported product. MHW also does not indicate whether the detention resulted from random sampling or from a focused problem issue.

For this report, we have elected to use import detention information available from the FDA and MHW for food products imported from RAP countries. This decision was made for two primary reasons: FDA and MHW data are more complete or reliable than those for any other major country importing RAP products, and the import detention profiles (product types, reasons for detention) for other countries importing RAP products are likely to be the same as those found by the FDA and MHW. For comparative purposes, we have also assessed the detention of products imported into the United States from Japan and Mexico.

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<sup>1</sup>The countries served by RAP are Bangladesh, India, Indonesia, Nepal, the Philippines, and Sri Lanka. Nepal is not included in this report because of lack of data and of relevant exports.

Because of the size of the United Kingdom's import market for food products from India, we did attempt to obtain import detention information for foods imported into the United Kingdom from India. We found, however, that the United Kingdom apparently does not maintain a central file of food import detention information; one must contact each primary port of entry. Although we have asked (including follow-on inquiries) the U.K. Ministry of Agriculture, Forestry and Fisheries to assist in this regard, we had, at the date of this report, received no information. Any information received will be provided in an addendum to this report.

For the United States, we accessed quantitative data from the U.S. Department of Commerce for food products imported from RAP countries. We have used this information as a means to normalize the FDA import detention information to evaluate intercountry comparisons. However, the quantitative data for food imports to the United States are arranged in a different categorization system than that employed by the FDA. For this reason, our comparative country analysis represents a best estimate effort only.

Recognizing the data limitations, the information obtained in this analysis of food import detentions from RAP countries into major target export markets provides a useful means of assessing their food safety and quality needs and provides one means to determine work priorities for the RAP project.

## METHODOLOGY

### U.S. DETENTIONS

Data on import detentions in the United States were obtained from FDA, the organization responsible for determining the status of imported foods in the United States. Data were obtained for all shipments detained by FDA from Bangladesh, India, Indonesia, the Philippines, Sri Lanka, Japan, and Mexico during fiscal years 1992, 1993, and 1994. Detentions were recorded by FDA for shipments of foods, drugs, and cosmetics. Only food detentions were examined for this analysis.

Detention information was reported by FDA only in terms of the specific product, the number of shipments detained at the U.S. port of entry, and the reason(s) for detention. Information regarding the weight, volume, and value of the shipments was not available.

The specific reason(s) for detention was recorded by FDA. Each of these detentions is categorized by the authors into 1 of 15 product classifications indicated below.

- Cocoa beans: whole cocoa beans
- Coffee beans: whole coffee beans, raw and roasted
- Juice/drinks/syrups: all juices, juice blends and concentrates, carbonated drinks, ground or instant coffee, tea, and beverage mixes
- Fresh fruit: all fresh fruits
- Processed fruit: canned, dried, pickled, or frozen fruits as well as fruit pulps, and fruit spreads
- Fresh vegetables: all fresh vegetables, including tuber vegetables such as potatoes, yams, and tapioca
- Processed vegetables: all canned, dried, pickled, or frozen vegetables, vegetable salsas, and canned tuber vegetables
- Fresh seafood: all fish and shellfish not specified as frozen and thus assumed fresh
- Processed seafood: all frozen, canned, salted, and dried fish and fish dishes, and fish sauces
- Rice and rice products: whole rice, rice flours, rice noodles, and rice crackers or wafers
- Grain other: all grains, flours and grain products not made with rice. Includes wheat flours, corn tortillas, crackers, noodles, biscuits, and cookies

- Nuts and legumes: raw and processed nuts, nut mixes, soybeans, bean curd, and other legumes
- Spices and condiments: all spices, seasoning blends and powders, condiment sauces such as soy sauce, and spreads
- Confectionery products: hard and soft candies including chocolates, dessert-type products including puddings and gelatins, candied fruits, and sugars
- Food other: all other food types including meat, poultry, eggs, seaweed, margarine and oils, and unrecognized foods

Product detentions generally fell into one of nine categories, as outlined in the box below, with the tenth category designated for other miscellaneous detention reasons.

<b>Detention Reasons</b>	
1.	Excessive pesticide residue — pesticide residues found above tolerance or on products for which no tolerance has been established in the United States.
2.	Excessive bacteria, mold and pathogens (for example, <i>Salmonella</i> , <i>listeria</i> , <i>C botulinum</i> ).
3.	Filth/extraneous material — rodent and animal filth, bird filth, insect filth, spiders and mites.
4.	Heavy metals -lead, mercury, and so forth.
5.	Improper food additives — unapproved, unspecified, or unsafe colors, preservatives, and other additives. Unapproved or excessive residues of drugs such as hormones and antibiotics are also included in this category.
6.	Labelling — mandatory labelling items omitted, nutrition labelling omitted, false/misleading labelling, improper product identification, or Fair Packaging and Labelling Act violations.
7.	Mycotoxins - all mycotoxins including aflatoxins.
8.	Spoiled or decomposed — decomposed product, product unfit for food.
9.	Violation of good management practices — unfiled process for low acid canned foods, substandard fill weight, inadequate acidification, swollen cans.
10.	Other — poisonous or deleterious substances, water contaminants, and tannins.

For analysis, the FDA detention information was tabulated and compiled as follows:

- Number of detentions by country by fiscal year;

- Percentage of total detentions for each product category type by country by fiscal year; and
- Percentage of total detentions for each reason for detention by country by fiscal year.

### JAPANESE DETENTIONS

MHW monitors import detentions for food products imported into Japan and publishes findings annually. MHW reports the number and weight of detentions by country, by product type, and by reason(s) for detention. This information, however, is not related to the total amount of imported food products.

Data were obtained for detentions of food products imported into Japan from Bangladesh, India, Indonesia, the Philippines, and Sri Lanka during fiscal years 1992 and 1993. The data for 1994 were not yet available at the time this report was prepared.

Although MHW classifies food product types and reasons for detention differently from the way it is done in the FDA system, for purposes of this report, the FDA categories were used for Japan. The relationship between the two systems used for this report is:

MHW categories	FDA category conversions
Meat, eggs, dairy, and their prepared products	Other foods
Seafood, seaweeds, and their prepared products	Fresh seafood; frozen seafood
Beans, grains, and their prepared products	Grains, others, and processed products
Fruits, vegetables, and prepared products	Fresh fruits, processed fruits, fresh vegetables, processed vegetables
Sugar, coffee, tea, cocoa, and their prepared products	Cocoa beans; food, others
All other foods	Food, others

For analysis, the MHW detention information was compiled as follows:

- Number and weight of food detentions per fiscal year;
- Weight of import detentions by product type by country per fiscal year; and
- Percentage of total detentions by reason for detention by country by fiscal year.

### NORMALIZATION AND COMPARATIVE ANALYSIS

The total amount and value of food imported into the United States in 1992 and 1993 were obtained from the information compiled by the U.S. Department of Commerce. For this report, the food products are categorized in the same manner as those for the FDA detentions.

For normalization purposes, for U.S. food import detentions, analyses were made based on the following:

- Number of detentions per kilogram of food product imported from each of the RAP countries; and
- Number of detentions per million dollars of food product imported from each of the RAP countries.

Because of the unavailability of information on total importation by amount or dollar volume by food product type into Japan, normalization of Japanese import detention information was not possible. The only comparative analysis with U.S. food import detentions is, therefore, that based upon percentage of violations by product and reasons for detention.

## RESULTS AND DISCUSSION

### U.S. FDA IMPORT DETENTIONS

#### Total Import Detentions (1992-1994)

Table 1 shows the U.S. FDA import detentions in 1992, 1993, and 1994 for food commodities shipped into the United States from the RAP countries, as well as from Japan and Mexico.<sup>2</sup> The level of detentions from India, Indonesia, the Philippines, and Mexico remained approximately the same over this time period. The number of detentions for Bangladesh and Japan declined substantially over the period, while detentions increased for Sri Lanka.

The lack of quantitative import information over the same period for which detention information is available (1994 data are not available) and the incompleteness in the way FDA maintains its import detention data make it difficult to assess the reasons for increases or decreases in detentions.

For example, it is difficult to ascertain the reasons for the decrease in detentions for Bangladesh and Japan. Bangladesh has essentially a single commodity export to the United States — seafood. The decrease in detentions is not matched by a decrease in the amount of exports, nor do we suspect that either the products exported or the processing capability of the Bangladesh seafood industry has improved substantially. For Japan, the decrease in detentions is spread over seven food categories (confectionery, grains, nuts and legumes, rice and rice products, processed seafood, spices and condiments, and processed vegetables), suggesting that factors other than those strictly associated with harvesting and processing were involved. Because of limitations on the manner in which FDA maintains its import detention information, it is not possible to determine whether total FDA inspections for these two countries declined, whether FDA decided to focus on products other than those of importance to the imports of these two countries, or whether other factors (for example, overall resources available for import surveillance) are involved.

The increase in detentions for Sri Lanka may likely be due to a simple increase in import volume; the 50 percent increase in detentions occurred with a 35 percent increase in import volume. The lack of 1994 import volume information prevents any additional assessment.

#### Import Detentions by Food Product Category (1992-1994)

Tables 2A, 2B, and 2C summarize the import detentions by product category by country for 1992, 1993, and 1994, respectively. The import detentions follow very closely the primary export commodities from each country.

From 1992 to 1994, shipments of fresh and processed seafood consistently accounted for the majority of detentions from RAP countries, ranging from 20 to 60 percent in any given year. Cocoa beans, one of the major export products of Indonesia, showed highest levels of detention (57-68 percent) for that country, as did spices and processed vegetables for Sri Lanka; rice, other greens, and processed seafood for India; and processed fruit and seafood for the Philippines.

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<sup>2</sup>The tables are found after the text.

Similar to the RAP countries, the product types most often detained from Japan were processed seafood (17-32 percent) and processed vegetables (31-37 percent). In contrast, products most often detained from Mexico included both fresh and processed vegetables, in addition to confections.

### **Total Importation by Food Product Category**

Tables 3A, 3B, 3C, and 3D present the total imports into the United States by product category for 1992 and 1993, in quantitative amounts (kilogram or kg) and dollar values, respectively. These tables illustrate more clearly the major export commodities from each of the RAP countries, Japan, and Mexico, confirming their correlation with the number of detentions reported above.

Fresh and processed seafood are major export commodities for the RAP countries, accounting for approximately 82,000 metric tons (MT) in 1992 and 64,000 MT in 1993, with an estimated value of \$350 million per year. For Indonesia, cocoa beans accounted for 48-50 percent of its export to the United States in the same years. For the Philippines, processed fruits and seafood accounted for 44-46 percent of their exports; spices and processed vegetables for Sri Lanka, at least 50 percent; and rice and processed seafood for India, 34-40 percent.

For Japan, the major food exports to the United States in 1992 and 1993 were fresh and frozen fruits, vegetables, and seafood, totalling 72,000-74,000 MT each year and accounting for 80-85 percent of their total food exports to the United States.

Mexico is one of the major exporters of fresh and processed fruits and vegetables to the United States and, for 1992 and 1993, 2-2.5 million MT were exported, accounting for at least 90 percent of their total food exports to the United States.

### **Normalization**

To facilitate comparison of the levels of detentions between countries, it is helpful to convert the detention level to a per unit value; for example, the number of detentions (for a specific product for a country) per kilogram or per million dollars (\$M) of imported product. We have termed this value a "normalized value." In principle, the higher the normalized value for a given commodity for a country, the greater the detention problem with that product for the given country. This approach works best when the level of imports is approximately the same for each country and the importing countries sample all imported products at a constant rate. In practice, however, the level of imports of a commodity type ranges substantially from one country to another. Furthermore, the sampling techniques of import control agencies are not linear with respect to the amount of imported product.

What one finds, therefore, is that in situations of very high import volume (for example, importing cocoa into the United States from Indonesia), the number of detentions per unit measure is lower than one might anticipate, whereas at low import levels (for example, importing fresh fruit into the United States from India), the detention rate per unit measure is higher than anticipated. In other words, potential problems appear worst when the export volume is low and appear better when the export volume is high. This is the trend for all RAP countries in our analysis, as well as for Japan and Mexico. Given this difficulty, however, the approach can still be helpful in highlighting major differences between countries.

Tables 4A and 4C present the number of detentions per kilogram of food imported into the United States from RAP countries, Japan, and Mexico by product type for 1992 and 1993, respectively. Tables 4B and 4D present the same information calculated on the basis of detentions per million dollars of imported product.

The analysis is perhaps most helpful with fresh seafood where the level of imports from the countries studied into the United States is generally within the same order of magnitude (except for Sri Lanka). Table 3A indicates that, for fiscal 1992, the number of detentions/kg(x 10<sup>-6</sup>) ranges from 24.7 for the Philippines to 0.38 for Japan; values for the specific countries are as follows: Bangladesh (7.00), India (0.85); Indonesia (7.70); Philippines (24.70), Japan (0.38), and Mexico (2.05).

This analysis appears to indicate that import issues associated with fresh seafood exported from the Philippines are substantial, whereas Japan's seafood products present the fewest problems. The other RAP countries are intermediate. Based on this assessment, RAP priority for improvement of seafood safety and wholesomeness should be focused on the Philippines, Indonesia, and Bangladesh. If fresh and processed seafood products are combined (product classification can be a complicating factor), the detentions/kg (10<sup>-6</sup>) become: Bangladesh (7.00); India (57); Indonesia (4.3); Philippines (11.8); and Japan (8.3). In this analysis, for RAP countries, India also becomes important. The trend is essentially the same for fiscal year 1993.

The analysis for other individual products is less straightforward, given substantially different amounts and values of product exported to the United States. For major commodities, however (vegetables, fruit, seafood, spices), the Philippines has the highest per unit value figures, indicating major difficulties in food production in this country. Additionally, India appears to have substantial problems with processed food products.

From a summary standpoint, among the RAP countries, the Philippines, Indonesia, and India are the biggest exporters of food products into the United States. The Philippines has the largest number of detentions per kilogram of product exported, followed by India and Indonesia. In value, India has the largest number of detentions per million dollars of exports, followed by the Philippines.

The number of detentions per volume of food products exported to the United States from Japan was lower by 16-20 percent than those of India and the Philippines. The number of detentions per kilogram of food imported are low for Mexico; detentions per million dollars are lower than for India or the Philippines.

### **Reasons for Detentions**

Tables 5A, 5B, and 5C present, for 1992, 1993, and 1994, respectively, the reasons for product detention for food imported into the United States from RAP countries, Japan, and Mexico.

Excessive filth, excessive bacteria, and product decomposition were clearly the leading causes for product rejection from all RAP countries and indicate where RAP should be focusing its attention for product remediation. Of these three problems, excessive filth was most often the leading cause for product rejection; 40-78 percent of all detained shipments from Indonesia, the Philippines, and India failed because of excessive filth levels.

Also of significance in product rejection were labelling violations and violations of good manufacturing practices (GMPs). GMP rejections were most often caused by the failure to file the proper

documentation with FDA to record the thermal process used for canned food products. These problems were most significant for the Philippines, India, and Sri Lanka. Both problems, proper labelling and proper filing of thermal processes, should be readily resolved through proper training and education of food processors.

The detention profile for products imported into the United States from Japan was different than that for RAP countries and appears to reflect the different types of problems facing developed versus developing countries. Incorrect use of food additives was consistently a major problem for Japanese products exported to the United States. Labelling and GMP problems also arose. What did not occur, or occurred at much lower levels, were problems associated with excessive bacteria, filth, and/or product spoilage and decomposition. This reemphasizes the priorities for RAP; that is, helping to solve problems involving filth, excessive bacteria, and product decomposition and spoilage.

Mexico presents an interesting comparison. Primary reasons for the rejection of products imported from Mexico into the United States were filth, pesticide residues, labelling violations, and excessive bacteria. The product rejection profile for Mexico is more similar to developing countries than to a developed country. The most interesting fact is the presence of excessive pesticide residues as a major cause for product rejection. We believe that the presence of excessive pesticide residue as a major import problem with Mexico and not with RAP countries lies not in the absence of a pesticide usage issue with RAP countries, but rather in geography. Excessive pesticide residues are most often a problem with fresh fruits and vegetables, particularly leafy green vegetables. Because shipping distances are great from RAP countries to the United States, transportation issues (costs, waste) prevent the shipment of many fresh fruits and vegetables from RAP countries to the United States. Thus, excessive pesticide residues are not seen as a major import problem into the United States from RAP countries.

It should not be assumed, however, that improper pesticide use is not a problem with RAP countries; pesticide use issues were repeatedly raised during fact-finding visits carried out by RAP team members with RAP country exporters and Asian (Hong Kong, Singapore, Korea, Japan) importers.

### **Comparison of Products Detained versus Products Imported**

Table 6 compares the primary products imported into the United States from RAP countries with the major commodities detained. The major products detained reflect the major commodities imported although not necessarily in the same order. The relationship between imports and detentions relates not only to the volume of imports but also to the potential for the commodity to present a serious food safety or quality problem. Products that present such safety or quality issues are detained at a greater frequency than their level of imports. For example, seafood, a product that presents potentially serious microbial food safety and quality issues, is consistently at or near the top of product detentions independent of import volume. Products that may present ongoing but not necessarily consistent problems vary in their relationship between import volume and detention rate. Spices and fruits and vegetables are such examples. Occasionally a single commodity dominates a country's profile because of both volume and health or quality detention issues. Cocoa from Indonesia, currently under automatic detention by the FDA, is such a commodity. The findings of Table 6 are of significant value because they clearly prioritize the commodity areas on which RAP should focus.

## FOOD IMPORT VIOLATIONS IN JAPAN

### Food Import Violations (1992-1993)

Tables 7A and 7B indicate, for 1992 and 1993, the relative volume of food import activity into Japan from RAP countries. Also indicated is the relationship between the volume of food inspected and the extent of violations for each RAP country. Based on the number of import applications, Indonesia and the Philippines are the primary RAP food exporters to Japan. India is third, followed by Bangladesh and Sri Lanka.

The information provided by Japan should, in principle, enable the researcher to determine the percentage of inspected product that is in violation, thus providing a relative measure of the ability of the countries to meet Japanese food laws. However, the figures for the percentage of inspected product detained given in Tables 7A and 7B vary widely from 1992 to 1993 for all but the Philippines. The reason for this is unclear but may be related to an increase in the level of inspection from 1992 to 1993, or to focused sampling on specific problem importers or other similar nonrandom inspection factors. Whatever the cause, the observed disparities prevent us from drawing conclusions from the data other than to suggest that the level of imported product detained from RAP countries may represent a significant percentage of RAP country exports to Japan.

### Import Violations by Product Category (1992-1993)

Tables 8A and 8B present import detentions in Japan from RAP countries, by product categories. As previously mentioned, for purposes of this report, a recategorization of Japanese food import product classifications was carried out to match the FDA categories; the categories shown in this report are, therefore, not as they appear in the compilation by MHW.

Although there is no available information on total importation by product type into Japan, it can be anticipated that the detentions follow each country's export priorities. The product mix from RAP countries is similar to those exported to the United States, and detention profiles are similar.

For 1992, 100 percent of the detentions from Bangladesh and India were fresh and processed seafood. Eight-six percent of the detentions from the Philippines for 1992 were also seafood. Seafood is clearly, therefore, a priority commodity for assistance in resolving export-related problems.

For 1993, although seafood still represented the major commodity detained (100 percent and 98 percent for Bangladesh and Indonesia, respectively), the mix of products detained was more varied. Processed fruits and vegetables from Indonesia and the Philippines and confectionery products from the Philippines were also frequently detained products.

Processed fruit products were the items detained from India in 1992, whereas processed vegetable products (along with grains/grain products and spices) were primary products detained in 1993.

As with the analysis of import volumes detained discussed above, MHW detention of commodities appears to vary significantly from 1992 to 1993, except for Bangladesh (which exports a single commodity — seafood). For example, only seafood detentions were reported for Indonesia for 1992, but 1993 detentions involved seafood, processed fruit, processed vegetables, rice and rice products, and

spices. A similar pattern was observed with the Philippines. The reason(s) for these changes are not clear but suggest significant programmatic shifts within MHW with respect to food import surveillance.

From RAP's perspective, the product commodities on which to focus to assist in resolving export-related difficulties are seafood and processed fruits and vegetables. For India, grain and grain products and spices also are of importance.

## **Reasons for Violations**

Tables 9A and 9B present the reasons for detention of shipments of food products imported into Japan for 1992 and 1993, respectively.

The reasons for the detention of RAP country products are somewhat different than those reported by the FDA. Based on experience with MHW and our discussions with Japanese government and trade association representatives, we believe the cause of this difference lies, to some extent, in the fact that MHW and FDA have different priorities. MHW has historically had significant interest in and concern with improper use of food additives. This is reflected in the detention statistics.

Excessive bacteria and decomposition are still important causes of product detention, particularly for seafood. Also of importance with seafood (in this case aquaculture) is the misuse of antibiotics. Contamination of edible seafood with poisonous species is also a major import detention reason for seafood imported into Japan from RAP countries.

The major cause of detention of processed food into Japan from RAP countries is the improper use of food additives. This reflects Japan's stringent food additive regulations and the focus given by MHW to ensure compliance.

Of note is product detention from India because of the presence of excessive aflatoxin residues. Product types involved in this area are primarily grain and grain products.

Of interest also is the lack of product detentions for excessive pesticide residues. MHW recorded no detentions for this area in either 1992 or 1993. The reason(s) for this is not entirely clear. RAP is aware that pesticide residue testing of imported product is being carried out by MHW at two central laboratories. We are also aware that concerns have been expressed by MHW regarding pesticide use on certain tropical crops (for example, bananas) imported into Japan, and that Japanese consumers have a concern for pesticide residues, which has translated into additional effort by MHW in this area. We are also aware that pesticide misuse is a problem in RAP countries.

The scope of this project does not permit a detailed investigation into the reasons for the failure of excessive pesticide residues to occur as a reason for detention of RAP commodities. It is possible that fresh commodity imports into Japan most frequently are such that pesticide use is minimized (for example, in imports of tropical fruits rather than leafy green vegetables). Whatever the cause, the failure to find import detentions due to pesticide residues should not be taken as a rationale for the lack of a pesticide misuse problem in RAP countries.

## SUMMARY AND RECOMMENDATIONS

Clear patterns of problem commodities and reasons for product failure upon import emerge from this import detention analysis. These patterns reflect findings obtained during in-country visits by RAP Environmental Team members and comments received from importers of RAP country products and government food control officials of importing countries.

The major products detained reflect the major products imported although not necessarily in the same order. The relationship between import volume and detention rates is determined both by volume and potential for the product to present serious food safety or quality issues. Seafood emerges as the clear priority commodity for RAP. Both the United States FDA and MHW data confirm this priority. Not only does seafood represent the major export from RAP countries; it also consistently accounts for the majority of detentions from RAP countries. RAP should devote attention to this commodity area based on a project objective to increase successful product exports.

In addition to seafood, cocoa is a clear priority product for Indonesia. Cocoa is the primary export commodity and the primary cause of product detentions.

Beyond these two product categories, the commodities or products detained are less predictable and generally include processed fruits and vegetables, grains and related products, and spices.

The primary causes for product detention are also reasonably clear. Excessive filth, excessive bacteria, decomposition, and spoilage are the leading causes of product failure. Lack of understanding of GMPs (such as failure to file thermal process information or improper additive use) and improper food labelling are also important causes of product detention. The import detention information from Japan also indicates that misuse of antibiotics in aquaculture, the failure to separate toxic seafood species from edible fish, and the misuse of food additives are import causes of product failure.

The normalization of import data to provide for cross-country comparisons was not as successful as desired. However, it did indicate that the Philippines has significant deficiencies in its food processing industry that cross commodity lines.

What is also clear from this analysis is that the lack of comprehensive import data and what appear to be programmatic shifts in import control agency priorities from year to year prevent an optimal import detention analysis. Findings of the work undertaken in this report are clearly limited by the available data.

Of interest is the failure to find excessive pesticide residues as a significant cause of product detentions for RAP country commodities imported into either the United States or Japan. This is, perhaps, not surprising given that commodities on which pesticide use is extensive (like leafy green vegetables) are not exported over great distances while commodities that are commonly imported (such as mango or banana) have less pesticide use. However, the lack of detentions for pesticide residues should not be interpreted as a lack of pesticide misuse problems in RAP countries. Clear concern was expressed by importers and government officials over RAP country pesticide use practices. Japan trade and government representatives, for example, specifically noted a pesticide problem (since resolved) on bananas imported from certain RAP countries. Additionally, Singapore, the one country that is geographically close enough to import significant amounts of leafy green vegetables from a RAP country (Indonesia), has clearly identified pesticide misuse as a priority for them. RAP should continue to maintain as a priority concerns associated with pesticide use in RAP countries.

The findings indicated by this import detention analysis reflect the findings from visits undertaken by RAP Environmental Team members in both RAP countries and target market import countries (Japan, the United States, Singapore, Hong Kong, and Korea). Importers consistently mentioned concerns they had with spoilage, decomposition, and poor product quality of imported RAP products. Although food safety was clearly important, product quality was such an issue that it overwhelmed safety issues. Poor product handling; poor temperature control; inadequate packaging; lack of adequate sorting, grading, and sizing; and lack of adequate control on processing were concerns. All of these factors relate to the deficiencies observed at import.

RAP country food processors, exporters, and government trade and regulatory organizations are aware of import detention issues and the causes for them. Many of their specific comments to RAP Environmental team members address the need to help resolve these problems. India government export trade officials, for example, noted the need for quality grading manuals for fresh agricultural commodities while Indian food processor association representatives requested assistance in providing information on food standards of target import countries. Philippine food trade association representatives noted the need for establishing an analytical facility to carry out filth and extraneous material analysis and the need for assistance in upgrading GMPs in processing establishments. Also, Indonesia cocoa representatives requested assistance in helping to resolve the current automatic detention of cocoa exported to the United States.

Based on the findings of this import detention analysis and the in-country visits, certain priorities for RAP associated with export enhancement emerge. These include:

- Providing assistance in improving the quality of exported seafood. Focused RAP assistance could involve practical training seminars on seafood HACCP.
- Reducing filth in exported commodities. RAP assistance could involve establishing analytical capability in this area to screen product planned for export. More in-depth assistance in terms of examining causes and control of the problem for one or two key commodities may also be possible.
- More broadly in this area, the upgrading of laboratories to allow accurate product testing prior to export for such items as microbiological levels, permitted food additives, and pesticide residues is a priority. Specific commodity lots meeting import requirements could then be selected.
- Providing assistance in good manufacturing practices and product labelling. RAP activities in this area can include:
  - Training workshops on process filing for low acid and acidified foods;
  - Product labelling workshops; and
  - Basic food plant sanitation workshops.
- Providing assistance in improving postharvest handling practices. RAP assistance in providing a technical workshop in this area would be of value. Also of value would be efforts to coordinate funding and project planning and development with the Asian Development Bank or the World Bank for in-depth remediation of the problem on one or more model commodities.

- Establishing assistance programs to provide food standards (for example, food additive permitted usages, composition standards, labelling and pesticide residue limits. Additionally, to assist in the development of commodity quality grade manuals.
- Providing assistance with pesticide use control; for RAP, given the limited resources and efforts already undertaken by other groups, focus should probably be on selected model programs involving major crops. The reader is referred to the Pride of India program developed by the RAP Environmental Team in this regard, and discussed in RAP technical report #10.

TABLE 1

TOTAL U.S. FDA FOOD IMPORT DETENTIONS FOR RAP COUNTRIES, JAPAN, AND MEXICO  
FISCAL YEARS 1992, 1993, 1994\*

YEAR	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
1992	105	927	617	1003	26	1483	1670
1993	90	952	627	828	39	923	1577
1994	59	921	754	930	59	523	1624

\*Data on Nepal were not available.

Regions Page 3 of 4

TABLE 2A

SHIPMENTS (BY PRODUCT CATEGORY) FROM RAP COUNTRIES, JAPAN, AND MEXICO  
DETAINED BY THE U.S. FDA\*

FISCAL YEAR 1992

PRODUCT CATEGORY	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Cocoa beans	-	-	-	-	404	65	-	-	-	-	-	-	-	-
Coffee beans	-	-	10	1	24	4	-	-	-	-	-	-	4	<1
Confectionery products	-	-	9	1	-	-	47	5	-	-	140	9	139	8
Fruit, fresh	-	-	16	2	-	-	26	3	-	-	2	<1	25	2
Fruit, processed	-	-	27	3	-	-	75	7	1	4	29	2	93	6
Grain, other	-	-	150	16	6	1	183	18	-	-	61	4	82	5
Juice/drinks/syrups	-	-	20	2	-	-	24	2	2	8	18	1	64	4
Nuts & legumes	-	-	26	3	5	1	28	3	-	-	115	8	4	<1
Rice & rice products	-	-	83	9	-	-	-	-	-	-	36	2	13	1
Seafood, fresh	-	59	3	<1	131	21	145	14	-	-	9	1	53	3
Seafood, processed	62	-	275	30	32	5	213	21	1	4	260	18	63	4
Spices & condiments	-	-	126	14	7	1	36	4	2	8	85	6	42	3
Vegetables, fresh	-	-	-	-	-	-	13	1	-	-	16	1	781	47
Vegetables, processed	-	-	160	17	1	<1	79	8	16	62	550	37	150	9
Food, other	43	41	22	2	7	1	134	13	4	15	162	11	157	9
<b>TOTAL</b>	<b>105</b>		<b>927</b>		<b>617</b>		<b>1003</b>		<b>26</b>		<b>1483</b>		<b>1670</b>	

\*Data on Nepal were not available.

TABLE 2B

SHIPMENTS (BY PRODUCT CATEGORY) FROM RAP COUNTRIES, JAPAN, AND MEXICO  
DETAINED BY THE U.S. FDA\*

FISCAL YEAR 1993

PRODUCT CATEGORY	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Cocoa beans	-	-	-	-	363	58	2	<1	-	-	-	-	-	-
Coffee beans	-	-	1	<1	25	4	-	-	-	-	-	-	9	1
Confectionery products	-	-	12	1	1	<1	31	4	-	-	36	4	215	14
Fruit, fresh	-	-	7	1	-	-	11	1	-	-	1	<1	46	3
Fruit, processed	-	-	27	3	8	1	80	10	4	10	23	2	81	5
Grain, other	-	-	101	11	6	1	173	14	-	-	26	3	60	4
Juice/drinks/syrups	-	-	28	3	3	<1	16	2	-	31	8	1	94	6
Nuts & legumes	-	-	76	8	-	-	31	4	-	-	34	4	17	1
Rice & rice products	-	-	181	19	-	<1	-	8	-	10	-	1	-	<1
Seafood, fresh	28	31	74	8	47	8	38	5	-	-	36	4	82	5
Seafood, processed	62	69	187	20	144	23	280	34	7	18	180	20	92	6
Spices & condiments	-	-	115	12	10	2	18	2	5	13	72	8	46	3
Vegetables, fresh	-	-	15	2	-	<1	-	1	-	8	4	<1	320	20
Vegetables, processed	-	-	52	5	14	2	27	2	3	-	428	46	369	23
Food, other	-	-	76	8	6	1	121	15	20	10	75	7	146	9
<b>TOTAL</b>	<b>90</b>		<b>952</b>		<b>627</b>		<b>828</b>		<b>39</b>		<b>923</b>		<b>1577</b>	

\*Data on Nepal were not available.

**TABLE 2C**  
**SHIPMENTS (BY PRODUCT CATEGORY) FROM RAP COUNTRIES, JAPAN, AND MEXICO**  
**DETAINED BY THE U.S. FDA\***

**FISCAL YEAR 1994**

PRODUCT CATEGORY	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Cocoa beans	-	-	-	-	515	68	-	-	-	-	-	-	-	-
Coffee beans	-	-	4	<1	22	3	1	<1	-	-	1	<1	6	<1
Confectionery products	-	-	9	1	3	<1	32	3	-	-	15	3	353	22
Fruit, fresh	-	-	17	2	-	-	29	3	1	2	1	<1	45	3
Fruit, processed	-	-	81	9	2	<1	148	16	4	7	7	1	145	9
Grain, other	-	-	97	11	6	1	63	7	3	5	19	4	23	1
Juice/drinks/syrups	-	-	10	1	-	-	16	2	9	15	3	1	43	3
Nuts & legumes	-	-	45	5	1	<1	41	4	1	2	29	6	6	<1
Rice & rice products	-	-	133	14	-	-	79	8	6	10	3	1	-	-
Seafood, fresh	1	1	17	2	13	2	49	5	1	2	25	5	23	1
Seafood, processed	58	99	278	30	176	23	311	33	5	9	168	32	124	8
Spices & condiments	-	-	97	11	3	<1	9	1	8	14	35	7	36	2
Vegetables, fresh	-	-	8	1	4	1	18	2	1	2	7	1	122	8
Vegetables, processed	-	-	82	9	2	<1	21	2	9	15	162	31	542	33
Food, other	-	-	43	5	7	1	113	12	11	19	48	9	156	10
<b>TOTAL</b>	<b>59</b>		<b>921</b>		<b>754</b>		<b>930</b>		<b>59</b>		<b>523</b>		<b>1624</b>	

\*Data on Nepal were not available.

TABLE 3A

**AMOUNT OF FOODS IMPORTED INTO THE U.S., BY PRODUCT CATEGORY  
FROM RAP COUNTIES, JAPAN AND MEXICO**

1992

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- kg -----						
Fruit							
fresh	0	30,845	0	917,223	0	1,591,338	752,972,135
processed	0	1,829,704	16,462,851	147,518,576	0	12,646,518	36,373,940
Vegetables							
fresh	0	272,730	0	216,434	0	154,496	692,185,789
processed	0	6,306,735	15,421,209	3,314,887	1,242,314	12,557,698	463,949,880
Seafood							
fresh	0	3,529,364	16,993,772	5,873,249	118,817	23,989,439	25,885,467
processed	8,858,737	1,380,775	20,657,775	24,409,059	0	8,317,775	3,919,916
Rice and products	0	12,528,163	0	0		64,392	94,640
Other grain/products	0	254,377	432,778	2,083,792	0	1,580,245	7,466,517
Spices	0	49,478,523	44,170,789	30,292	776,975	270,166	29,977,976
Fruit juices/syrups	0	217,286	1,091,519	158,014,030	0	15,008,265	69,982,798
Cocoa beans	0	57,150	104,291,494	3,303,112	0	114,730	17,410,907
Confectionery	0	285,552	507,205	1,143,638	0	4,292,361	24,843,250
Other food products	29,940	23,467,286	597,663	32,433,619	552,355	2,055,693	24,693,718
<b>TOTAL</b>	8,888,677	99,638,490	220,627,055	379,257,911	2,690,461	82,643,116	2,149,756,933

TABLE 3B

**VALUE OF FOODS IMPORTED INTO THE U.S., BY PRODUCT CATEGORY  
FROM RAP COUNTRIES, JAPAN AND MEXICO**

1992

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- ,000 dollars -----						
<b>Fruit</b>							
fresh	0	169	0	1,280	0	4,372	102,875,956
processed	0	3,320	10,087	106,004	0	19,328	43,313
<b>Vegetables</b>							
fresh	0	184	0	135	0	727	439,349
processed	0	7,118	40,879	3,587	729	34,547	345,726
<b>Seafood</b>							
fresh	875	4,723	12,449	6,130	0	75,353	34,890
processed	67,227	13,630	160,303	86,563	1,222	60,127	213,517
Rice and products	0	17,203	0	0	0	58	70
Other grain/products	0	209	3,215	2,856	0	1,488	803
Spices	0	63,637	73,206	59	2,874	1,607	46,781
Fruit juices/syrups	0	172	339	38,046	0	6,593	26,836
Cocoa beans	0	143	104,569	9,337	0	313	21,985
Confectionery	0	362	1,100	2,306	0	25,290	48,262
Other food products	68	109,284	2,601	35,362	619	11,342	71,244
<b>TOTAL</b>	<b>68,170</b>	<b>220,154</b>	<b>408,748</b>	<b>291,665</b>	<b>5,444</b>	<b>241,145</b>	<b>104,168,732</b>

TABLE 3C

AMOUNT OF FOODS IMPORTED INTO THE U.S., BY PRODUCT CATEGORY  
FROM RAP COUNTRIES, JAPAN AND MEXICO

1993

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- kg -----						
Fruit							
fresh	0	46,266	212,932	89,302	0	1,358,830	764,944,530
processed	0	27,173,549	26,962,090	150,375,206	623,690	19,797,948	60,481,788
Vegetables							
fresh	0	323,241	0	0	0	123,555	812,853,469
processed	0	7,080,890	12,706,018	2,952,587	2,120,500	12,506,936	675,070,819
Seafood							
fresh	236,307	5,691,512	4,004,515	2,091,968	0	21,373,042	8,899,970
processed	9,572,873	19,796,318	12,266,303	9,807,498	139,997	4,882,402	13,658,236
Rice and products	0	17,516,938	0	0	0	0	0
Other grain/products	0	562,866	1,810,611	2,965,242	0	8,352,154	41,240,101
Spices	0	23,731,063	22,086,573	26,031	506,258	127,823	10,559,090
Fruit juices/syrups	0	132,163	3,803,571	142,668,667	0	10,901,154	130,317,924
Cocoa beans	0	-	86,958,995	1,985,541	0		16,121,971
Confectionery	0	45,464	255,388	161,589	0	633,975	18,037,373
Other food products	0	32,752,616	643,082	31,091,745	257,581	3,032,583	14,896,888
<b>TOTAL</b>	<b>9,809,180</b>	<b>134,852,886</b>	<b>171,710,078</b>	<b>344,215,376</b>	<b>3,648,026</b>	<b>83,090,402</b>	<b>2,567,082,159</b>

TABLE 3D

VALUE OF FOODS IMPORTED INTO THE U.S., BY PRODUCT CATEGORY  
FROM RAP COUNTRIES, JAPAN AND MEXICO

1993

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- ,000 dollars -----						
Fruit							
fresh	0	95	0	20	0	0	0
processed	0	8	0	1	0	2	2
Vegetables							
fresh	0	5	0	96	0	22	2
processed	0	23	0	22	22	16	0
Seafood							
fresh	1	0	1	3	0	0	0
processed	0	45	1	5	0	4	1
Rice and products	0	5	0	0	0	621	186
Other grain/products	0	718	2	64	0	41	102
Spices	0	2	0	610	1	53	1
Fruit juices/syrups	0	116	3	1	0	3	2
Cocoa beans	0	7	4	0	0	3	46
Confectionery	0	25	0	20	0	6	3
Other food products	632	1	14	5	8	24	2
<b>TOTAL</b>	<b>633</b>	<b>1049</b>	<b>25</b>	<b>847</b>	<b>31</b>	<b>795</b>	<b>348</b>

TABLE 4A

**NUMBER OF DETENTIONS PER KILOGRAM OF FOOD IMPORTED INTO THE U.S.  
FROM RAP COUNTRIES, JAPAN AND MEXICO**

1992

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- (x 10 <sup>-6</sup> ) -----						
Fruit							
fresh	0	520.00	0.00	28.30	0.00	0.13	0.03
processed	0	15.00	0.06	0.51	0.00	2.29	2.56
Vegetables							
fresh	0	3.70	0.00	60.10	0.00	104.00	11.10
processed	0	25.00	0.07	23.80	12.90	43.80	0.32
Seafood							
fresh	0	0.85	7.70	24.70	0.00	0.38	2.05
processed	7.00	200.00	1.50	8.73	8.42	31.30	16.10
Rice and products	0	6.60	0.00	0.00	0.00	559.00	137.00
Other grain/products	0	590.00	14.00	87.80	0.00	38.60	11.00
Spices	0	2.50	0.16	1190.00	2.57	315.00	1.40
Fruit juices/syrups	0	92.00	0.92	0.15	0.00	1.20	0.92
Cocoa beans	0	17.00	3.87	0.30	0.00	8.72	0.06
Confectionery	0	32.00	1.97	41.10	0.00	32.60	5.60
Other food products	1440.00	2.47	58.60	4.87	12.73	135.00	6.70
<b>TOTAL</b>	<b>1447.00</b>	<b>1507.12</b>	<b>88.85</b>	<b>1470.36</b>	<b>36.62</b>	<b>1272.01</b>	<b>194.84</b>

TABLE 4B

NUMBER OF DETENTIONS PER MILLION DOLLARS OF FOOD IMPORTED INTO THE U.S.  
FROM RAP COUNTRIES, JAPAN AND MEXICO

1992

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- per million dollars -----						
Fruit							
fresh	0	95	0	20	0	0	0
processed	0	8	0	1	0	2	2
Vegetables							
fresh	0	5	0	96	0	22	2
processed	0	23	0	22	22	16	0
Seafood							
fresh	0	0	1	3	0	0	0
processed	1	45	1	5	0	4	1
Rice and products	0	5	0	0	0	621	186
Other grain/products	0	718	2	64	0	41	102
Spices	0	2	0	610	1	53	1
Fruit juices/syrups	0	116	3	1	0	3	2
Cocoa beans	0	7	4	0	0	3	46
Confectionery	0	25	0	20	0	6	3
Other food products	632	1	14	5	8	24	2
<b>TOTAL</b>	<b>633</b>	<b>1049</b>	<b>25</b>	<b>847</b>	<b>31</b>	<b>795</b>	<b>348</b>

TABLE 4C

NUMBER OF DETENTIONS PER KILOGRAM OF FOOD IMPORTED INTO THE U.S  
FROM RAP COUNTRIES, JAPAN AND MEXICO

1993

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- (x 10 <sup>6</sup> ) -----						
Fruit							
fresh	0	151	<1	123	0	1	<1
processed	0	1	<1	1	6	1	1
Vegetables							
fresh	0	46	0	0	0	32	<1
processed	0	7	1	9	1	34	1
Seafood							
fresh	118	13	12	18	0	2	9
processed	1	9	12	29	50	37	7
Rice and products	0	10	0	0	0	0	0
Other grain/products	0	179	3	58	0	3	1
Spices	0	5	<1	691	10	563	4
Fruit juices/syrups	0	212	<1	1	0	1	1
Cocoa beans	0	0	4	1	0	0	0
Confectionery	0	263	4	192	0	57	12
Other food products	0	4	48	5	78	25	11
<b>TOTAL</b>	<b>119</b>	<b>900</b>	<b>84</b>	<b>1,127</b>	<b>145</b>	<b>756</b>	<b>46</b>

TABLE 4D

NUMBER OF DETENTIONS PER MILLION DOLLARS OF FOOD IMPORTED INTO THE U.S.  
FROM RAP COUNTRIES, JAPAN AND MEXICO

1993

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	JAPAN	MEXICO
	----- per million dollars -----						
<b>Fruit</b>							
fresh	0	28	0	33	0	<1	<1
processed	0	1	<1	1	1	1	1
<b>Vegetables</b>							
fresh	0	66	0	0	0	7	1
processed	0	7	1	9	2	12	1
<b>Seafood</b>							
fresh	44	7	3	5	0	<1	3
processed	<1	2	1	7	5	4	1
Rice and products	0	8	0	0	0	0	0
Other grain/products	0	196	3	37	0	1	1
Spices	0	8	<1	236	2	56	3
Fruit juices/syrups	0	329	3	<1	0	3	3
Cocoa beans	0	0	5	<1	0	0	0
Confectionery	0	47	2	86	0	8	9
Other food products	0	1	10	5	68	4	3
<b>TOTAL</b>	44	700	28	417	78	96	26

TABLE 5A

## REASONS FOR DETENTION OF SHIPMENTS FROM RAP COUNTRIES, JAPAN, AND MEXICO\*

FISCAL YEAR 1992

DETENTIONS	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Aflatoxin/Mycotoxin	-	-	1	<1	-	-	3	<1	-	-	-	-	35	2
Excessive Bacteria/Pathogens	70	67	220	24	75	12	79	8	-	-	7	<1	182	11
Spoiled/Decomposed	35	33	51	6	17	3	103	10	-	-	17	1	11	1
Filth/Extraneous Material	-	-	424	46	483	78	441	44	3	12	140	9	614	37
Improper Food Additives	-	-	21	2	-	-	79	8	-	-	608	41	103	6
Violation of GMPs	-	-	21	2	29	5	125	12	15	58	298	20	14	1
Heavy Metals	-	-	2	<1	4	1	3	<1	-	-	17	1	40	2
Labelling Violation	-	-	154	17	4	1	158	16	4	15	388	26	296	18
Excessive Pesticide Residue	-	-	21	2	1	<1	-	-	4	15	4	<1	368	22
Other	-	-	12	1	4	1	12	1	-	-	4	<1	7	<1

\*Data on Nepal were not available.

TABLE 5B

## REASONS FOR DETENTION OF SHIPMENTS FROM RAP COUNTRIES, JAPAN, AND MEXICO\*

FISCAL YEAR 1993

DETENTIONS	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Aflatoxin/Mycotoxin	-	-	1	<1	1	<1	1	<1	-	-	-	-	44	3
Excessive Bacteria/Pathogens	45	50	195	20	136	22	35	4	1	3	17	2	228	14
Spoiled/Decomposed	30	33	79	8	33	5	96	12	-	-	55	6	18	1
Filth/Extraneous Material	10	11	429	45	390	62	355	43	14	36	76	8	522	33
Improper Food Additives	-	-	7	1	22	4	83	10	4	10	295	32	82	5
Violation of GMPs	-	-	59	6	19	3	116	14	6	15	138	15	119	8
Heavy Metals	-	-	4	<1	2	-	2	<1	-	-	7	1	49	3
Labelling Violation	5	6	120	13	21	3	134	16	14	36	317	34	262	17
Excessive Pesticide Residue	-	-	47	5	-	-	2	<1	-	-	-	-	220	14
Other	-	-	11	1	3	<1	4	<1	-	-	18	2	33	2

\*Data on Nepal were not available.

TABLE 5C

## REASONS FOR DETENTION OF SHIPMENTS FROM RAP COUNTRIES JAPAN, AND MEXICO\*

FISCAL YEAR 1994

DETENTIONS	BANGLADESH		INDIA		INDONESIA		PHILIPPINES		SRI LANKA		JAPAN		MEXICO	
	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%	# DET.	%
Aflatoxin/Mycotoxin	-	-	-	-	-	-	1	<1	-	-	-	-	24	1
Excessive Bacteria/Pathogens	41	69	268	29	85	11	90	10	1	2	48	9	278	17
Spoiled/Decomposed	12	20	42	5	81	11	109	12	-	-	11	2	26	2
Filth/Extraneous Material	1	2	456	50	546	72	430	46	9	15	55	11	784	48
Improper Food Additives	5	8	8	1	3	<1	48	5	2	3	65	12	123	8
Violation of GMPs	-	-	63	7	21	3	171	19	15	25	163	31	43	3
Heavy Metals	-	-	-	-	-	-	-	-	1	2	9	2	7	<1
Labelling Violation	-	-	68	7	9	1	78	8	31	53	165	32	140	9
Excessive Pesticide Residue	-	-	3	<1	-	-	2	<1	-	-	1	<1	196	12
Other	-	-	13	1	9	1	1	<1	-	-	6	1	3	<1

\*Data on Nepal were not available.

TABLE 6

COMPARISON OF PRIMARY DETENTIONS VERSUS PRIMARY IMPORTS INTO THE U.S. FOR RAP COUNTRIES<sup>1,2,3</sup>

YEAR	BANGLADESH PRIORITY BY		INDIA PRIORITY BY		INDONESIA PRIORITY BY		PHILIPPINES PRIORITY BY		SRI LANKA PRIORITY BY	
	DETENTION	IMPORT	DETENTION	IMPORT	DETENTION	IMPORT	DETENTION	IMPORT	DETENTION	IMPORT
1992	Seafood	Seafood	Seafood Vegetables Grains/grn.products Spices	Spices Rice/RC Prod. Vegetables Seafood Fruit	Cocoa Seafood	Cocoa Spices Seafood Fruit Vegetables	Seafood Grain/ products	Juice Fruit Seafood Vegetables Cocoa	Vegetables	Vegetables Spices Seafood
1993	Seafood	Seafood	Seafood Rice/RC prod. Spices Grain/grn. products	Fruit Seafood Spices Rice/RC prod. Vegetables	Cocoa Seafood	Cocoa Fruit Spices Seafood Vegetables	Seafood Grain/ products Fruit	Fruit Juice Seafood Vegetables Grain/ grn.prod.	Juice Seafood Spices Fruit Rice/RC prod.	Vegetables Fruit Spices Seafood
1994	Seafood	NA	Seafood Rice/RC prod. Spices Grain/grn. products	NA	Cocoa Seafood	NA	Seafood Fruit	NA	Juice Vegetables Fruit Seafood Rice/RC prod.	NA

<sup>1</sup> All products exceeding 10% of total detentions, listed in order (greater to lesser) of level of detentions.

<sup>2</sup> Top five imported products, by amount, listed in order (greater to lesser) of level of imported product.

<sup>3</sup> For seafood, fruit, vegetables; combines fresh and processed product.

**TABLE 7A**

**RELATIONSHIP BETWEEN FOOD IMPORT AMOUNTS AND LEVELS OF VIOLATION  
FOR FOODS IMPORTED INTO JAPAN FROM RAP COUNTRIES**

1992

<b>COUNTRY</b>	<b># OF IMPORT APPLICATIONS</b>	<b>WEIGHT (MT)</b>	<b># OF INSPECTIONS</b>	<b>WEIGHT OF INSPECTIONS (MT)</b>	<b># OF VIOLATIONS</b>	<b>WEIGHT OF DETENTIONS (MT)</b>	<b>% OF INSPECTED PRODUCT DETAINED</b>
Bangladesh	1,849	3,300	837	381	5	96	29
India	6,612	66,148	902	11,384	1	1,440	2
Indonesia	18,363	237,872	3,873	38,575	7	21,376	9
Philippines	16,618	746,509	4,151	24,137	28	12,677	2
Sri Lanka	1,130	7,386	169	422	1	-	-

MT: metric tons

**TABLE 7B**  
**NUMBER AND WEIGHT OF FOOD IMPORT VIOLATIONS**  
**FROM RAP COUNTRIES INTO JAPAN**

1993

COUNTRY	# OF IMPORT APPLICATIONS	WEIGHT (MT)	# OF INSPECTIONS	WEIGHT OF INSPECTIONS (MT)	# OF VIOLATIONS	WEIGHT OF DETENTIONS (MT)	% OF INSPECTED PRODUCT DETAINED
Bangladesh	3,437	5,031	3,035	1,201	2	846	17
India	7,713	74,639	1,250	14,690	7	33,735	45
Indonesia	19,460	293,809	5,824	59,402	33	122,198	41
Philippines	20,698	891,514	5,371	153,285	41	30,650	3
Sri Lanka	1,502	7,233	280	506	1	955	13

MT: metric tons

TABLE 8A

WEIGHT OF DETENTIONS OF FOOD IMPORTED INTO JAPAN  
FROM RAP COUNTRIES BY PRODUCT TYPE

1992

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA
	----- metric tons -----				
Fruit					
fresh	0				
processed	0	1,440		282	
Vegetables					
fresh	0				
processed	0			408	
Seafood					
fresh			183	182	
processed	96		21,193	10,670	
Rice and products					
Other grain/products	0				
Spices	0				
Fruit juices/syrups	0				
Cocoa beans	0				
Confectionery	0				
Other food products	0			1,135	
<b>TOTAL</b>	<b>96</b>	<b>1,440</b>	<b>21,376</b>	<b>12,677</b>	

TABLE 8B

WEIGHT OF DETENTIONS OF FOOD IMPORTED INTO JAPAN  
FROM RAP COUNTRIES BY PRODUCT TYPE

1993

	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA
	----- metric tons -----				
Fruit					
fresh	0				
processed	0		1,005	16,430	
Vegetables					
fresh	0				
processed	0	32,500	1,100	300	
Seafood					
fresh			112	43	
processed	846		119,366	1,203	
Meat, milk, eggs/products					
Rice and products			240	1,727	
Other grain/products	0	1,175			
Spices	0	40	30	446	
Fruit juices/syrups	0				955
Cocoa beans	0				
Confectionery	0			10,501	
Other food products	0	20	345		
<b>TOTAL</b>	846	33,735	122,198	30,650	955

TABLE 9A

**NUMBER OF DETENTIONS OF FOOD IMPORTED INTO JAPAN FROM RAP COUNTRIES  
BY DETENTION REASON**

1992

DETENTION REASONS	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	TOTAL	
					No.	Percent
Aflatoxin						
Excessive bacteria/pathogens				8,800	8,800	25
Spoiled/decomposed	96				96	0.2
Filth/extraneous materials						
Improper Food Additives (incl. Antibiotics)		1440	20,693	3,208	25,341	72
Violation of GMPs						
Heavy metals						
Labelling violation						
Excessive pesticide residues						
Other (contamination with poisonous fish)			683	351	1,034	3

**TABLE 9B**  
**NUMBER OF DETENTIONS OF FOOD IMPORTED INTO JAPAN FROM RAP COUNTRIES**  
**BY DETENTION REASON**

1993

DETENTION REASONS	BANGLADESH	INDIA	INDONESIA	PHILIPPINES	SRI LANKA	TOTAL	
						No.	%
Aflatoxin		1,185				1,185	0.6
Excessive bacteria/pathogens	826		1,000	2,603		4,429	2
Spoiled/decomposed							
Filth/extraneous materials							
Improper Food Additives (incl. Antibiotics)	20	32,550	120,923	21,999	955	176,447	94
Violation of GMPs				5,714		5,714	3
Heavy metals							
Labelling violation							
Excessive pesticide residues							
Other (contamination with poisonous fish)			275	333		608	0.3