Nation-wide Food Safety Assurance Program to Prevent Food Detention by Importing Country

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ABSTRACT

The FDA’s data indicate that some Indonesian food export to the U.S. have been subjected to automatic de-
etsion and no sign of declining within the last 13 months (April 1997 – April 1998). This status was based on past history of the Indonesia commodity which failed to meet the existing requirements. Cocoa beans exporters were among the most frequent violators, followed by the tuna and shrimp manufacturers or exporters. The new HACCP-based requirement especially for imported fish which became effective since December 18, 1997 would certainly pose significant problem which could undermine the nation ability to overcome the current economic crises. Systematic programs have to be developed and correctly deployed to meet the strict requirements demanded by the importing country. The objective of the proposed Partnership in Food Safety Assurance program is to assure that all processed foods including fish and fishery products and the condition under which these foods are manufactured will result in safe food. The primary intention of the proposed program is to focus on the food manufacturing facilities and their links to incoming raw materials and shipment of finished products.

INTRODUCTION

Indonesian export has suffered significant loss of foreign income due to rejection and/or detention of food products, especially cocoa bean, fish, and fishery products, at the port of entry in the United States of America. Most of the rejections were resulted from nonconfor-
mance with the existing requirements or regulations as mandated by the federal agency such as the Food and Drug Administration (Department of Health and Human Services).

The number of food detention cases and their values in 1992, 1993, and 1995 were 643 cases (US$ 225.2 million), 622 cases (US$ 157.9 million), and 76 cases (US$ 100.02 million), respectively (Syarif, 1996). Most of the 763 cases of detained food products in 1995 were dominated by cocoa and cocoa products (514 cases, US$ 82.6 million) and fish and seafood (192 cases, US$ 17.58 million). Most of these food commodities were detained due to the presence of filth, foreign object, or Salmonella. These problem, however, was also happened in other food exporting countries such as India, Taiwan, Thailand, Philippines, Malaysia, etc.

Knowing that these detained food products have resulted in significant loss of the most needed foreign income, especially under current condition of monetary crises, vigorous effort has to be allocated to address this problem. First, we need to perform a self-evaluation related to this matter. Significant factors contributing to the strength are tremendous domestic fish and marine resources and labor is cheaply available. Among the weaknesses are substandard practices in food handling, processing, and distribution resulted in significant quality and quantity losses; poor coordination among producers, exporters, research institution, and government agencies; and lack of enforcement of international standards and training. The real threats are contaminated water originated from municipal and industrial waste; emerging competitors from other developing countries capable of producing better quality and lower price products; relatively high interest rate in banking system; and unnecessarily lengthy and complicated export bureaucracy. At the same time the demand of cocoa product, fish and fishery products in the global market is growing.

The objective of this paper is to evaluate the current detention cases (1997 – 1998), to learn the import regulations mandated by FDA, and to propose a nation-wide program for assuring food safety to prevent detention by importing country. The detention cases by the U.S. has been selected for the sake of discussion in this paper.

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FOOD DETENTION REPORT

The United States of America is one of the biggest market for Indonesian food export. In the last four years the exported food commodities has been dominated by cocoa beans, cocoa paste and cocoa butter, fish, and fishery products including shrimp (Table 1). The value of the exported food to the U.S. neared in 1997. The figures, however, could have been larger due to the detention or automatic detention without physical examination imposed by the FDA ‘Food and Drug Administration’ at various port of entry in the U.S.

Table 1. U.S. Import of Agricultural and Fish Products from Indonesia Fiscal Year 1994 – 1998 (in thousands of dollars)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cocoa Beans</td>
<td>26,390,000</td>
<td>58,770,000</td>
<td>72,400,000</td>
<td>56,800,000</td>
<td>41,500,000</td>
</tr>
<tr>
<td>Cocoa Paste and Cocoa Butter</td>
<td>13,903,000</td>
<td>14,051,000</td>
<td>16,201,000</td>
<td>17,901,000</td>
<td>20,002,000</td>
</tr>
<tr>
<td>Processed fruit and vegetables</td>
<td>37,698,000</td>
<td>60,173,000</td>
<td>71,441,000</td>
<td><strong>84,756,000</strong></td>
<td>34,436,000</td>
</tr>
<tr>
<td>Fresh and frozen fish</td>
<td>1,355,000</td>
<td>2,564,000</td>
<td>6,140,000</td>
<td><strong>8,831,000</strong></td>
<td>4,644,000</td>
</tr>
<tr>
<td>Shrimp</td>
<td>119,824,000</td>
<td>61,529,000</td>
<td>90,407,000</td>
<td><strong>160,131,000</strong></td>
<td>59,399,000</td>
</tr>
<tr>
<td>Tuna</td>
<td>36,152,000</td>
<td><strong>82,039,000</strong></td>
<td>42,310,000</td>
<td>39,606,000</td>
<td>30,481,000</td>
</tr>
<tr>
<td>Lobster</td>
<td>124,000</td>
<td>166,000</td>
<td>175,000</td>
<td>19,000</td>
<td>54,000</td>
</tr>
<tr>
<td>Other edible fish and shellfish</td>
<td>33,988,000</td>
<td><strong>43,759,000</strong></td>
<td>37,483,000</td>
<td>44,997,000</td>
<td>30,436,000</td>
</tr>
</tbody>
</table>

October 1997 – February 1998. **Highest import since fiscal year of 1997.**

Most of the cocoa beans were detained due to the excessive presence of filth and/or foreign object (Table 2). Sample of frozen swordfish was found to be poisonous, canned tuna was filthy, and Salmonella was persistently found in samples of frozen shrimp. Other Indonesian food commodities also violated the mandated FDA’s regulation such as canned fruit or vegetable, and fish or vegetable juices. A complete description of the reason of detention is defined in violation code listed in Table 3.

Within the period of April 1997 to April 1998 there were approximately 599 cases of detention of food originating from Indonesia. Some of food manufacturers or exporters repetitively violated the existing requirements. Cocoa beans exporters were among the most frequent violators, followed by the tuna and shrimp manufacturers or exporters (Table 4). Indeed, the cocoa beans and shrimp producers have enjoyed tremendous profit. Most of this profit, if not all, was derived from the

Table 2. Number of detention of Indonesian food products at the port of entry in the U.S.A. from April 1997 to April 1998

<table>
<thead>
<tr>
<th>Date</th>
<th>Number of Cases</th>
<th>Type of Product</th>
<th>Violation Code*</th>
</tr>
</thead>
<tbody>
<tr>
<td>April 97</td>
<td>4</td>
<td>Processed Sh Surgish Fish</td>
<td>Poisonous, Leathery Filthy, Filthy</td>
</tr>
<tr>
<td>May 97</td>
<td>13</td>
<td>Canned Sh Surgish Fish</td>
<td>Filthy</td>
</tr>
<tr>
<td>June 97</td>
<td>23</td>
<td>Processed Sh Surgish Fish</td>
<td>Filthy</td>
</tr>
<tr>
<td>July 97</td>
<td>43</td>
<td>Canned Tuna</td>
<td>Filthy</td>
</tr>
<tr>
<td>August 97</td>
<td>42</td>
<td>Canned Tuna</td>
<td>Filthy, Salmonella</td>
</tr>
<tr>
<td>September 97</td>
<td>110</td>
<td>Canned Tuna</td>
<td>Filthy, Salmonella, Poisonous</td>
</tr>
<tr>
<td>October 97</td>
<td>22</td>
<td>Processed Sh Surgish Fish</td>
<td>Filthy, Foreign Object, Leathery Filthy, No Process</td>
</tr>
<tr>
<td>November 97</td>
<td>24</td>
<td>Canned Tuna</td>
<td>Filthy, Salmonella</td>
</tr>
<tr>
<td>December 97</td>
<td>91</td>
<td>Canned Tuna</td>
<td>Filthy, Foreign Object, Filthy, Frozen Object, No Process, Need ICE, No Process, Poisonous</td>
</tr>
<tr>
<td>January 98</td>
<td>36</td>
<td>Canned Tuna</td>
<td>Need ICE, Leathery Filthy, Nutri Lit, Foreign Object, No Process, Foreign Object, Filthy, Salmonella, Infection, Under MIU, Poisonous</td>
</tr>
<tr>
<td>February 98</td>
<td>37</td>
<td>Canned Tuna</td>
<td>Filthy, Foreign Object, Filthy, Frozen Object, No Process, Need ICE, No Process</td>
</tr>
<tr>
<td>March 98</td>
<td>27</td>
<td>Canned Tuna</td>
<td>Filthy, Frozen Object, Filthy, Salmonella, Poisonous</td>
</tr>
<tr>
<td>April 98</td>
<td>45</td>
<td>Canned Tuna</td>
<td>Filthy, Foreign Object, Filthy, Salmonella, Poisonous</td>
</tr>
<tr>
<td>Total</td>
<td>399</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Source:** FDA Import Detention Reports. *See Table 1 for full violation code interpretation.

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This can be used as an obvious evidence that most of Indonesia's food manufacturers or exporters have been very slow, if not unwilling to respond to the recent cases of food detection. The newly imposed HACCP for imported fish which became effective since December 18, 1997 would certainly create a potential of win-win situation for manufacturers and fishery products in the future, unless a systematic food safety management is vigorously implemented. Therefore, a nation-wide food safety assurance program may be immediately planned to secure the global competitiveness of the Indonesian food export.

### FDA IMPORT PROCEDURE

With the exception of most meat and poultry, all foods are subject to examination by FDA when they are being imported or offered for import into the United States. Most meat and poultry products are regulated by the U.S. Department of Agriculture. To ensure that FDA is notified of all regulated products imported into the United States, the importer or its representative, must file entry documents with the U.S. Customs Service within five working days of the date of arrival of a shipment at a port of entry (FDA, 1996).

FDA is notified of an entry a regulated food through: [a] duplicate copies of Customs Entry Document or [b] a copy of commercial invoice, and [c] surety to cover potential duties, taxes and penalties. FDA reviews importer's Entry Documents to determine if a physical examination, wharf examination, sample examination should be made. If decision is not to collect a sample, FDA sends a "May Proceed Notice" to U.S. Customs and the importer of record. The shipment is released as long as FDA is concerned. If the decision is to collect a sample based on: [a] nature of the product, [b] FDA priority, and [c] past history of the commodity, FDA sends a "notice of Sampling" to U.S. Customs and the importer of record. The shipment must be held intact pending further notice. A sample will be collected from the shipment. The importer of record may move the shipment from the dock to another port of warehouse. FDA obtains a physical sample of the product is sent to an FDA District Laboratory for analysis. If the FDA analysis finds the sample to be in compliance with the requirements, FDA sends a Release Notice to U.S. Customs and the importer of record. If the results of analysis indicated that the sample "appears to be..."

### Table 3. Violation Code Translation for Import Food from Indonesian in the U.S. Between April 1997 and April 1998

<table>
<thead>
<tr>
<th>Viol. Code</th>
<th>Section of CFR</th>
<th>Charge Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zusa86</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>Tusa17</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
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<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
<tr>
<td>False</td>
<td>40CFR 164,600, 21CFR 123</td>
<td>Adulteration</td>
</tr>
</tbody>
</table>

Source: FDA Violation Code Translator
<table>
<thead>
<tr>
<th>No.</th>
<th>Company’s Name</th>
<th>Type of Commodity</th>
<th>Number of Detection in May 1997 - April 1998</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ARK</td>
<td>Cocoa Bean</td>
<td>5 4 5 21 3 3 4 2 1 2</td>
<td>51</td>
</tr>
<tr>
<td>2</td>
<td>BCI</td>
<td>Cocoa Bean</td>
<td>5 1 1 1 2 1 3 2 2 1 5 3 2 1 3 4 2 1 2 1 3 5 3 4 1</td>
<td>72</td>
</tr>
<tr>
<td>3</td>
<td>CM</td>
<td>Cocoa Bean</td>
<td>3 2 2 2 6 2 3 2 1 1 1 3 2 1 1 1 2 1 1 3 1 1 1 4 1 2 1 1 3 1 1 1 1 4 1 2</td>
<td>54</td>
</tr>
<tr>
<td>4</td>
<td>GL</td>
<td>Cocoa Bean</td>
<td>3 4 3 7 2 4 3 2 1 3 3 3 3 3 2 1 3 3 2 1 3 3 3 3 2 1 3 3 2 1 3 3 3 3 2 1 3</td>
<td>54</td>
</tr>
<tr>
<td>5</td>
<td>GN</td>
<td>Cocoa Bean</td>
<td>5 1 1 1 2 1 3 2 1 1 1 3 2 1 1 1 2 1 1 3 1 1 1 4 1 2 1 1 3 1 1 1 1 4 1 2</td>
<td>54</td>
</tr>
<tr>
<td>6</td>
<td>JN</td>
<td>Cocoa Bean</td>
<td>1 1 1 1 2 1 3 2 1 1 1 3 2 1 1 1 2 1 1 3 1 1 1 4 1 2 1 1 3 1 1 1 1 4 1 2</td>
<td>54</td>
</tr>
<tr>
<td>7</td>
<td>SS</td>
<td>Cocoa Bean</td>
<td>1 3 3 5 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3</td>
<td>65</td>
</tr>
<tr>
<td>8</td>
<td>SA</td>
<td>Cocoa Bean</td>
<td>3 2 2 2 6 2 3 2 1 3 3 3 3 3 2 1 3 3 2 1 3 3 3 3 2 1 3 3 2 1 3 3 3 3 2 1 3</td>
<td>54</td>
</tr>
<tr>
<td>9</td>
<td>AP</td>
<td>Trans</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>10</td>
<td>BPMP</td>
<td>Trans</td>
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<td>25</td>
</tr>
<tr>
<td>11</td>
<td>EKI</td>
<td>Trans</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>12</td>
<td>CWI</td>
<td>Shipment</td>
<td>1 1 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>13</td>
<td>PIP</td>
<td>Shipment</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>14</td>
<td>PAS</td>
<td>Shipment</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>15</td>
<td>RH</td>
<td>Shipment</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
</tr>
<tr>
<td>16</td>
<td>Shipment</td>
<td>2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2</td>
<td>25</td>
<td></td>
</tr>
</tbody>
</table>

Source: FDA, Import Detection Reports.

**Table 4. Records of repeat detection imposed to various Indonesian food exporters (May 1997 to April 1998)**

The Notice of Refusal of Admission is carried out under the direction of U.S. Customs.

If importer of record present evidence indicating that the product is in compliance, certified analytical results of samples, examined by a reliable laboratory and which are within the published guidelines for levels of contaminants and defects in food for human use, may be presented. If the analytical results of samples violate the permitted limits, the importer of record submits an application for authorization to Recondition or to Perform Other Action. The form requests permission to try to bring a food that is adulterated or misbranded into compliance by reworking or other action, or by converting to a non-food use. A detailed method to bring the food into compliance must be given.

FDA collects follow-up sample to determine compliance with guidelines. If FDA finds that the sample is "in compliance", a Release Notice with the statement “Originally Detained and Now Release" is sent to U.S. Customs and the importer. If FDA finds that the sample is not in compliance, the importer may either submit Application for Authorization to Recondition or to Perform Other Action, or FDA will issue a Notice of Refusal of Admission. The other action is that FDA evaluates the reconditioning procedure proposed by the importer. A bond, however, is required for payment of liquidated damages. If FDA approves importer's reconditioning procedures, the approved application contains

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the statement "Mechandise Should Be Held Intact Pending the Receipt of FDA's Release Notice". FDA may disapprove applicant's procedures if past experience shows that the proposed method will not succeed. A second and final request will not be considered unless it contains meaningful changes in the reconditioning operation to ensure a reasonable chance of success.

Impoter completes all reconditioning procedures and advises FDA that the goods are ready for inspection/sample collection. FDA conduct formal follow-up inspection/sample collection to determine compliance with the terms of the reconditioning authorization. If FDA analysis finds that the sample is in compliance, a Release Notice is sent to the importer and to U.S. Customs. The charges for FDA supervision are assessed and copies are sent to U.S. Customs which is responsible for obtaining total payment including any expenses incurred by their personnel. If FDA analysis finds that the sample is still not in compliance, charges for FDA supervision are also assessed and copies are also sent to U.S. Customs.

Importers can speed-up their food entries by: [a] determining before shipment that the product to be imported is legal, [b] having private laboratories examine samples of food to be imported and certify the analysis of the processor (while not conclusive, these analyses might serve as an indication of the processor's ability to produce acceptable, legal products, [c] becoming acquainted with FDA's legal requirements, before contracting for a shipment, [d] requesting assistance from the FDA District Office responsible for the port of entry, and [e] knowing the overall importing procedures.

IMPORT RECORDS REVIEW AND EXAMINATION

Records review is the initial examination provided imported products, involving a review of the importer's documentation including any electronic entry filing information. This operation is performed on every entry of regulated product to determine whether additional action, such as sampling, is necessary. At the point of the review one of four decisions is made: [a] release the lot, or [b] automatically desist the lot, or [c] examine the lot by Wharf Examination or sampling, [d] or verify registration, listing, declaration, and certifications where applicable. This decision is based on a number of factors which include: [a] computerized information, [b] import alerts, [c] monthly detention list, [d] pre-approval, [e] compliance program guidance manual, [f] assignments, [g] local assignments and programs (e.g., Regional Pesticide Sampling plan).

A wharf examination may be defined as: "the examination of a product, in import status, sufficient in scope to determine that the product appears to be 'in compliance' for the attributes for which the lot was examined." It may be conducted on products discharged from vessels on to the wharves (piers), pier sheds, and other locations; products in trucks, trains, freezers, and containers, etc., at border entry points, or on products set aside for FDA examination. A wharf examination represents the most in-depth non-sample examination at a product. It involves actual physical examination of the product for: damage including storage or intranit water damage, spillage of other cargo, adverse environmental contamination including lack of adequate cooling for refrigerated or frozen cargo, rodent or insect activity, physical color of foods, odor, or label compliance, and the determination if the product appears to be in compliance for the attribute(s) for which examined. It does not have the same statistical confidence that a sample examination does. Consequently, the FDA always use more stringent levels of acceptance than any regulatory levels when determining what to sample. For example, the guideline for whole insects is 10 per 100 g in product X. When a wharf examination is performed, the inspector may sample products based on only one or two insects being found per approximately 100 g examined. The decision to sample is to some degree left to the discretion of the inspector. In most instances, it should be based on findings significantly lower than permitted by the guideline.

SPECIAL REQUIREMENT FOR IMPORTED FISH PRODUCTS

On December 18, 1997, 21 CFR Part 123 became effective. Under this regulation, all fish and fishery products, whether foreign or domestic origin, are requested to be prepared, packed and held in facilities operating under mandatory HACCP requirements. Importers of fish or fishery products who fail to meet the verification requirements of 12 CFR 123, 12 will have their seafood entries, their foreign processor(s), and their own firm placed on detention without physical examination. This importer, foreign processor, and its product will remain...

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in detention without physical examination until importer is able to comply with the requirements which verify that the foreign processor(s) are in compliance with seafood HACCP.

However, there may be situations where the importer has complied with verification requirements and has taken affirmative steps under 21 CFR 123.12 (a) (2) but the foreign processor(s) has not implemented HACCP or has failed to comply with the seafood HACCP regulation. FDA might determine these facts through inspection of the importer, inspection of the foreign processor, review of import entry records, or through review of an importer's seafood product reconditioning proposal. If such situation arise, the foreign processor and the specific fish/fishery product(s), rather than the importer, may be subject to detention without physical examination.

The 21 CFR 123 addresses the fish and fishery products, while the 21 CFR 123.12 sets forth special requirement for imported fish and fishery products. The full requirements are stated below.

Section 123.12 (a) Importer verification. Every importer of fish or fishery products shall either:

(1) Obtain the fish and fishery products from a country that has an active memorandum of understanding (MOU) or similar agreement with the Food and Drug Administration, that covers the fish or fishery product and documents the equivalency or compliance of the inspection system of the foreign country with the U.S. system accurately reflects the current situation between signing parties, and is functioning and enforceable in its entirety; or

(2) Have and implement written verification procedures for ensuring that the fish and fishery products that they offer for import to the U.S. were processed in accordance with the requirements of this part. The procedures shall at a minimum:

(i) Product specifications that are designed to ensure that the product is not adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act because it may be injurious to health or have been processed under insanitary conditions, and,

(ii) Affirmative steps that may include any of the following:

(A) Obtaining from the foreign processor the HACCP and sanitation monitoring records required by this part that relate to the specific lot of fish or fishery products being offered for import;

(B) Obtaining either a continuing lot-by-lot certificate from an appropriate foreign government inspection authority or competent third party certifying that the imported fish or fishery products is or was processed in accordance with the requirements of this part;

(C) Regularly inspecting the foreign processor's facilities to ensure that the imported fish or fishery products is being processed in accordance with the requirements of this part;

(D) Maintaining on file a copy, in English, of the foreign processor's HACCP plan, and a written guarantee from the foreign processor that the imported fish or fishery product is processed in accordance with the requirements of this part;

(E) Periodically testing the imported fish or fishery products, and maintaining on file a copy, in English, of a written guarantee from the foreign processor that the imported fish or fishery product is processed in accordance with the requirements of this part;

(F) Other such verification measures as appropriate that provide an equivalent level of assurance of compliance with the requirements of this part.

(b) Competent third party. An importer may hire a competent third party to assist with or perform any or all of the verification activities specified in paragraph (a) (2) of this section, including writing the importer's verification procedures on the importer's behalf.

(c) Records. The importer shall maintain records, in English, that document the performance and results of the affirmative steps specified in paragraph (a) (2) (ii) of this section. These records shall be subject to the applicability of the provisions of Sec. 127.9 (record keeping requirement).

(d) Determination of compliance. There must be evidence that all fish and fishery products offered for entry into the U.S. have been processed under conditions that comply with this part. If assurances do not exist that the imported fish or fishery product has been processed under condition that are equivalent to those required of domestic processors under this part, the product will appear to be adulterated and will be denied entry.

FOOD SAFETY ASSURANCE PROGRAM

Purpose and Significance

The goals of Indonesia's five year plan for the 1994 - 1999 period include: developing trade infrastructure, improving regulations and bureaucracy af-
fecting trade, encouraging partnerships between large and small enterprises, and encourage exports by small firms. Indonesia export of agricultural products, especially foods, has, become one of the driving force for foreign income. The United of America has been one of the growing market for food from Indonesia. Unfortunately, not all of the exported food conform with the existing requirements which results in reinspection, detention, or rejection. The figures in 1995 indicated that approximately more than 100 million dollar worth of exported were rejected due to the presence of filth, decomposition products, and pathogen such as Salmonella. This eventually contributing to significant loss of foreign income. Most of the nonconforming units have failed to meet the food safety standards as mandated by the federal agency such as the FDA. There is an indication that the trend of the rejected food is growing in term of volume and value if no intervention program exist. This will certainly become a serious threat to the sustainability of Indonesia's food export which eventually undermine the country's ability to overcome the current economic crisis. Action programs have to be developed and implemented to remedy this emerging problem.

The purpose of the program is to promote Partnership in Food Safety Assurance (PFSA) program to strengthen competitive position of fish and fishery product processors in the domestic and global market place. Its short term objective is to initiate partnership among processors, exporters, food safety and policy experts, and government agencies through establishment of Safe Food Network as a medium for information exchange. This network will enable all related parties, local or international, to communicate with each other. It will also open the possibility to access information from all over the world on food safety management. Its long term objective is to strengthen partnership among suppliers, processors, exporters, food safety experts, and officials to assure safety of the Indonesian foods especially fish and seafood exported not only to the United States, but also to other countries. This will be achieved through active and mutual information sharing on food safety management, systematic training on Hazard Analysis and Critical Control Point (HACCP) and its implementation in the fish and fishery product processing establishments, suppliers, and exporters.

The pressure is coming from a recent information from the FDA indicated that the seafood HACCP regulation became effective by December 18, 1997. However, foreign seafood products processed before December 18, 1997 will be allowed into the U. S. with out HACCP verification as long as the importer provide the FDA with the date of production. Any company exporting fish products to North America or Europe must have to implement such a program. If an exporting company cannot demonstrate to the satisfaction of the regulating agencies in importing countries that it has an effective program at its respective processing plant, importers will not be permitted to accept the imported products. The demand from importing countries here. Exported fish and seafood have to be certified that they were processed in a plant with an approved HACCP plan in operation. In addition, the plant must also meet international requirements for construction and hygiene.

The United Nations food standard group Codex Alimentarius Commission has recommended HACCP adoption as a system for assuring the safety of foods as the prevention of foodborne diseases. Throughout the world, the World Trade Organization's Agreement on the Application of Sanitary and Phytosanitary Measures and the Technical Barriers to Trade are being acted upon, and governments and industry are being urged to facilitate implementation of these agreements and to bring about equivalency, harmonization, and transparency to minimize barriers to international trade. In addition, the demand for safety is not only limited to exports, but it is also increasingly demanded by local or domestic consumers and regulators as well.

HACCP is compatible with the implementation of such quality management systems and in the system of choice in the management of food safety. Total Quality Management (TQM) and ISO 9000 standard are generally recognized by customers, while HACCP is recognized by governments. Although TQM, ISO 9000, and HACCP are compatible, one does not replace the other. Government recognition of HACCP as the most effective means of managing food safety is increasing worldwide, and more countries, both importers and producers, are making HACCP mandatory. There has been some concern, however, that there is a danger in customization of HACCP programs by governments or industries due to valid social, economic, and cultural reasons which could lead to challenges in negotiating equivalence agreements.

The objective of the Partnership in Food Safety Assurance (PFSA) program is to assure that all processed foods (including fish and seafood) and the condition under which these foods are manufactured will result in Indonesian Food and Nutrition Progress; 1998 Vol 5, no 3
safe food. It is known that food processing is only one link in the food chain. It is the intention of the government to encourage the adoption of HACCP principles, since it has been internationally recognized as a logical tool towards a more modern and scientifically based inspection system.

The significance of HACCP implementation goes beyond processors, governments, consumers, and beyond. It is the intention of the government to make good use of the resources available to them in a sequential fashion, from high risk to low risk, depending on production type, establishment compliance, or plant complexity. The program will also bring closer communication between inspectors and industry staff. The communication will permit informal as well as formal exchange of information related to safe handling of food products. Implementation of the program by an establishment may permit a streamlining of other programs currently requiring inspection services (i.e., export certification). In this way the government will be in a better position to respond to recently emerging priorities with its limited resources.

Internationally, the PFS program is consistent with the principles and application of HACCP system developed by the Codex Alimentarius Commission which are gaining worldwide acceptance. Domestically, the program meets or exceeds the current national standards in food inspection and Good Manufacturing Practices (GMP). In the long run, the PFS program will enhance the principles of shared responsibility for food inspection in Indonesia without loss of assurance of food safety.

**Approach and Activities**

In response to the significant numbers of detention of Indonesian food exports due to failure in meeting food safety requirements, the government has informed the international trade community of the possibility of new and stringent export controls. The government has taken steps to improve the inspection system and has been working with the Codex Alimentarius Commission to develop international standards for food safety. The government has also introduced new regulations and standards to ensure the safety and quality of Indonesian food products.

The government is committed to ensuring the safety and quality of food products exported from Indonesia. It has been working with the Codex Alimentarius Commission to develop international standards for food safety. The government has also introduced new regulations and standards to ensure the safety and quality of Indonesian food products.

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according to well defined parameters. Under the PPSA program the following generic steps are applicable to all commodity groups.

1. Plants are responsible for developing their own HACCP based program. The programs includes all details on critical control points (CCPs) for each production line along with addressing program prerequisites (i.e., sanitation program, pest control, etc.) to ensure food safety.

2. Steering Committee on Food Safety (SCFS), which will be established under PPSA program, assesses these HACCP based programs and assists plants to meet the mandated requirements during the development and implementation of this program in their establishments. Once an establishment's HACCP based program is deemed acceptable by the SCFS, it is implemented. Members of SCFS will be selected from related government agencies, industry, and experts. These SCFS members will work in different groups with respect to their field of expertise, authority, or group of commodity.

3. Industry personnel are responsible for controlling, monitoring, and keeping accurate records for each CCP and ensuring proper procedures and controls have been followed. Plant management reviews plant records to identify deviations, discrepancies or problems and take designated corrective action.

4. The SCFS will review plant records, assess corrective action, observe on-line processing at critical control points, take samples as appropriate, and verify that the overall HACCP plan is effective.

**Specific Measurable Objectives**

The proposed activities include the establishment of Safe Food Network as a model system for information exchange concerning with food safety and implementation of HACCP as a tool for assuring food safety in selected fish or fishery product processing establishments as a pilot project. The specific objectives of the establishments of Safe Food Network in Indonesia will include:

1. Keeping up with the reports of outbreaks related to fish or seafood including locations, identified vehicles, number of victims, severity of illnesses, follow up actions, definitive/tentative cause or illnesses.

2. Communicating cases of food detention including food identity, name of processors/exporters, name of buyers, volumes and values, method of delivery, date and reason for detention, and their follow up or remedial actions.

3. Proposing a revision of the existing policies or regulations to enhance the national food safety assurance program in order to succeed in global markets.

The establishment of the Safe Food Network is one of the essential ingredients for a sustainable partnership in Food Safety Assurance program through implementation of HACCP initiated in fish and seafood industry. Specific objectives related to the implementation of HACCP program will include:

1. Obtaining commitment from top management of the company as evidenced by personnel and resources allocation in the formation of HACCP team in the establishment, training for managers, supervisors, and line workers.

2. Obtaining commitment from related government agencies (Department of Agriculture, Department of Health, Department of Industry and Commerce, or State Ministry of Food Affairs) as indicated by their staff representatives involvement in planning and the implementation of the HACCP program.

3. Forming a steering committee for Partnership in Food Safety Assurance program supported by qualified personnel from the government agencies, industry, food safety experts, and consumer representatives.

4. Designing curriculum and course materials for HACCP training to the industry personnel and members of the steering committee.

5. Preparing generic HACCP plan for the fish and seafood industry which can be used by specific establishments.

6. Preparing manuals for the implementation of HACCP system as a model for the national food safety assurance.

7. Preparing certification bodies to assist the implementation of in-plant HACCP program.

8. Performing cost evaluation for the in-plant HACCP implementation.

9. Monitoring the conformance of the processed products with the safety requirement in the importing country when the HACCP has been established.

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10. Performing evaluation on the overall implementation program and preparing recommendation for follow up actions.

**SUMMARY**

Cocoa beans exporters were among the most frequent violators, followed by the tuna and shrimp manufacturers or exporters. Indeed, the cocoa beans and shrimp producers have enjoyed tremendous profit. Most of this profit, if not all, however, was derived from the weakening value of the rupiah against the dollar, while nothing has been done to assure food safety. The newly imposed HACCP-based requirement especially for imported fish which became effective since December 18, 1997 would certainly pose significant problem which could undermine the nation ability to overcome the current economic crises. Systematic programs have to be developed and correctly deployed to meet the strict requirements demanded by the importing country.

The objective of the proposed Partnership in Food Safety Assurance program is to assure that all processed foods including fish and fishery product and the condition under which these foods are manufactured will result in safe food. The primary intention of the proposed program is to focus on the food manufacturing facilities and their links to incoming raw materials and finished product delivery.

Once the program implemented, the government will have the ability to direct its limited resources for those particular plants which are required to implement the HACCP requirement mandated by their customers. The proposed program principles are consistent with the principles and application of HACCP system developed by the Codex Alimentarius Commission which are gaining world-wide acceptance.

**REFERENCES**


Indonesian Food and Nutrition Progress, 1998 Vol 5, no. 2