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

Sri Raharjo

Faculty of Agricultural Technology, Gadjah Mada University, Yogyakarta 55281

ABSTRACT

The FDA's data indicate that some Indonesian food export to the U.S. have been subjected to automatic detention and no sign of declining within the last 13 months (April 1997 – April 1998). This status was based on past hystory 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 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 facilites 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 nonconformance 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$ 152,9 million), and 763 cases (US$ 100.02 million), respectively (Syarif, 1996). Most of the 763 cases of detained food products in 1995 were dominated by cacao and cacao 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 threaths 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 beaurocracy. 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 regulation mandated by FDA, and to propose a nationwide program for assuring food safety to prevent detention by imporing country. The detention cases by the U.S. has been selected for the sake of discussion in this paper.

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. peaked 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)**

Product	Year (October – September)				
	1994	1995	1996	1997	1998*
Cocoa beans	86,944	46,300	109,334	**147,415	71,025
Cocoa Paste and Cocoa Butter	13,903	45,091	60,301	**84,627	40,018
Processed fruit and vegetables	37,698	60,170	71,441	**84,756	34,436
Fruit and vegetable juices	1,395	2,566	6,140	**9,831	4,644
Shrimp	110,824	61,529	90,407	**160,133	58,328
Tuna	34,152	**50,038	42,310	39,606	20,841
Lobster	124	164	175	19	18
Other edible fish and seafood	32,388	**45,779	37,483	44,997	30,424

*October 1997 – February 1998, **Highest import since fiscal year of 1970.
Source: U.S. Census Bureau.

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 fruit 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 originated 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**

Date	Number Cases	Type of Product	Violation Code*
April '97	4	Frozen Swordfish Canned Shrimp Cocoa Beans	Poisonous Labeling Filthy Filthy
May '97	13	Frozen Tune Canned Tuna Canned Shrimp Cocoa Beans	Filthy Filthy Filthy Filthy
June '97	33	Canned Tune Frozen Tuna Cocoa Beans Frozen Shrimp	Filthy Filthy Foreign Object Poisonous
July '97	43	Cocoa Beans Canned Tuna Crushed Pineapple Frozen Shrimp	Filthy Filthy Filthy Salmonella
August '97	42	Cocoa Beans Canned Pineapple Canne Mushrooms Frozen Shrimp Canned Tuna Coconut Milk	Filthy, Foreign Object, Soaked/Wet Sulfite No Process No Process Filthy, Salmonella No Process, Needs FCE No Process
Sep '97	110	Cocoa Beans Frozen Shrimp Frozen Swordfish	Filthy Filthy, Salmonella Poisonous
October '97	53	Cocoa Beans Canned Tuna Frozen Swordfish Frozen Shrimp Canned Pineapple Juice Canned Mushroom	Filthy, Foreign Object Filthy, No Process Poisonous Filthy, Salmonella Needs FCE, No Process Poisonous
November '97	34	Cocoa Beans Frozen Shrimp	Filthy Filthy, Salmonella
December '97	91	Cocoa Beans Crushed Pineapple Frozen Shrimp Coconut Cream Straw Mushrooms Frozen Albacore Frozen Swordfish	Filthy, Foreign Object Filthy, Foreign Object Filthy, Salmonella, No Process No Process, Needs FCE Filthy Poisonous
January '98	56	Canned Clams Frozen Tuna Cocoa Beans Canned Mushrooms Dried Salted Fish Frozen Shrimp Canned Pineapple Frozen Swordfish	Needs FCE False, Lacks Firm, Nutrit Lbl Filthy, Foreign Object No Process Insanitary Foreign Object, Filthy, Salmonella Insanitary/Soaked/Wet Poisonous
February '98	37	Cocoa Beans Canned Tuna Dried Shark's Fins Canned Mushroom Frozen Swordfish	Filthy, Foreign Object Filthy Filthy No Process Poisonous
March '98	37	Cocoa Beans Canned Shrimp Cooked & Peeled Shrimp Canned Tuna Frozen Shrimp Canned Crabmeat Canned Pineapple Coffee Beans	Filthy, Foreign Object Filthy Salmonella Filthy Salmonella, Filthy, Insanitary Filthy Lacks Firm, Lack N/C, Usual Name Filthy
April '98	46	Cocoa Beans Canned Tuna Canned Crabmeat Frozen Shrimp Frozen Swordfish Fish Crackers	Filthy, Foreign Object Filthy Filthy Filthy, Salmonella, Foreign Object, Container Poisonous Filthy
Total	599		

Source: FDA-Import Detention Reports
*See Table 3 for full violation code translation

weakening value of the rupiah against the dollar. Therefore, the increase in profit was not resulted from improved quality or safety. In fact, the number of detention showed no trend of declining.

Table 3. **Violation Code Translation for Imported Foods from Indonesian in the U.S. Between April 1997 and April 1998**

Violation Code	Section in CFR	Charge Statement
'Container'	402 (a)(6), 801 (a)(3) Adulteration	The container appears to be composed, in whole or in part of a poisonous or deleterious substance which may render the contents injurious to health.
'Exsess Sul'	402 (a)(1), 801 (a)(3); Adulteration	The article appear to contain excessive sulfites, a poisonous and deleterious substance which may render injurious to health.
'False'	403 (a)(1), 801 (a)(3); Misbranding	The labeling of the article appears to be false and misleading.
'Filthy'	402 (a)(3), 801 (a)(3); Adulteration	The article appears to consist in whole or in part of a filthy, putrid, or decomposed substance or be otherwise unfit for food.
'Forbidden'	801 (a)(2); Forbidden or restricted in sale	The article appears to be forbidden or restricted in sale in the country in which it was produced or from which it was exported.
'Foreign Ob'	402 (a)(3), 801 (a)(3); Adulteration	The article appears to consist in whole or in part of a filthy, putrid, decomposed substance, or is otherwise in unfit for food in that it appears to contain foreign objects.
'Insanitary'	501 (a)(2)(A), 801 (a) (3); Adulteration	The article appears to have been prepared, packed, or held under insanitary condition where it may have been contamined with filth, or whereby it may have been rendered injurious to health.
'Lacks firm'	403 (e)(1), 801 (a)(3); Misbranding	The food is in package form and appears to not bear a label containing the name a place of business of the manufacturer, packer, or distributor.
'Lacks N/C'	502 (b)(2), 801 (a)(3); Misbranding	The article is in package form and appears to not have a label containing an accurate statement of the quantity of the contents in terms of weight, measure or numberical count and no variation or exemption has been prescribed by regulations.
'Needs FCE'	402 (a)(4), 801 (a)(3); Adulteration	It appears the manufacturer not registered as a low acid canned food or acidified to manufacturer pursuant to 21 CFR 108.25 [c][1] or 108.35 [c][1].
'No Process'	402 (a), 801 (a)(3); Adulteration	It appears that the manufacturer has not filed information on its schedule process as required by 21 CFR 108.25 [c][2] or 108.35 [c][2].
'Nutrit Lbl'	403 (q); 801 (a)(3); Misbranding	The article appears to be misbranded in that the label or labeling fails to bear the required nutrition information.
'Poisonous'	402 (a)(1), 801 (a)(3); Adulteration	The article appears to contain a poisonous or deleterious substance which may render injurious to healt.
'Presrv Lbl'	403 (k), 801 (a)(3); Misbrading	The article appears to contain a chemical preservative and fails to bear labeling stated that fact including its function.
'Salmonella'	402 (a)(1), 801 (a)(3); Adulteration	The article appears to contain *Salmonella*, a poisonous and deleterious substance which may render it injurious to health.
'Soaked/wet'	402 (a)(4), 801 (a)(3); Adulteration	The article appears to have been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health in that it appears to been held in water.
'Usual Name'	403 (i)(1), 801 (a)(3); Misbranding	It appears that the label do not bear to the common or usual name of the food.

Source: FDA-Violation Code Translations

This can be used as an obvious evidence that most the Indonesia's food manufacturers or exporters have been very slow or unwilling to respond to the recurring cases of food detention. The newly imposed HACCP-based requirement for imported fish which became effective since December 18, 1997 would certainly cause a potential growing number of detention of exported fish and fishery products in the future, unless a systematic food safety management is vigorously implemented. Therefore, a nation-wide food safety assurance program have to 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 his/her 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, [b] copu 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 far as FDA is concerned. If the decision is to collect a sample based on: [a] nature of the product, [b] FDA priorities, 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 futher notice. A sample will be collected from the shipment. The importer of record may move the shipment from the dock to another port or warehouse.

FDA obtains a physical sample. The sample 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 in

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

No.	Company's Name	Type of Commodity	Number of Detention in May 1997 – April 1998											Total
			May 97	June	July	Aug	Sept	Oct	Nov	Dec	Jan 98	Feb	March	April	
1.	ABK	Cocoa Beans		5	4	5	21	3	3	9	7	3	4	3	67
2.	BCI	Cocoa Beans					1		2	4	2	1	1		11
3.	CM	Cocoa Beans		3	1	1	5	1	1				1		13
4.	EI	Cocoa Beans		2		2	6		1		3	1			14
5:	GL	Cocoa Beans		5	4	6	7	2	4	15	7	2	1	1	54
6.	OI	Cocoa Beans		4	1	4	19	4	1				1		34
7.	SN	Cocoa Beans			6	1	11	3	2	6	4	1	3	8	45
8.	SS	Cocoa Beans		1	3		3		1	5	2		1		16
9.	SA	Cocoa Beans			3		1	3		2					9
10.	SII	Cocoa Beans	5		5	2	1		5			6		5	29
11.	AP	Tuna	2	8	1		1	1			2	5	4	1	25
12.	BMPP	Tuna					1	2	1		1	1	1	4	11
13.	BKI	Tuna		1					2	6			1		10
14.	CWS	Shrimp					1			6			2		9
15.	PBT	Shrimp					4								4
16.	PAS	Shrimp							6		1				7
17.	RR	Shrimp						5							5
18.	SB	Shrimp				6				8					14

Source: FDA-Import Detention Reports.

violation of the FD&C Act and other related Acts", FDA sends U.S. Customs and the importer of record a Notice of Detention and Hearing which: [a] spesifies the nature of the violation, and [b] gives the importer of record 10 working days to introduce testimony as to the admissibility of the shipment. The hearing is the importer's only opportunity to present a defense of the importation and/or to present evidence as to how the shipment may be made eligible for entry.

Consignee, true owner, importer of record, or a designated representative responds to the Notice of Detention and Hearing. The response permits the introduction of testimony, either orally or written, as to the admissibiliy of the shipment. FDA conducts a hearing concerning the admissibility of the product. The hearing is an opportunity to present relevant matters and is confined to the submission of pertinent evidence. If the consignee, true owner, importer record, or a designated representative neither responds to the Notice of Detention and Hearing nor requests an extension of the hearing period, FDA issues a Notice of Refusal of Admission to the importer of record. This is the same person or firm who was sent a Notice of Sampling. All recipients of the Notice of Sampling and the Notice of Detention and Hearing are sent a copy of the Notice of Refusal. FDA receives verification of the exportation or destruction of the shipment from U.S. Customs. The exportation or destruction of the merchandise listed on 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 bey relabelling 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

the statement "Merchandise Should Be Held Intact Pending the Receipt of FDA's Release Notice". FDA may disapprove applicant's reconditioning procedure 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.

Importer completes all reconditioning procedures and advises FDA that the goods are ready for inspection/sample collection. FDA counducts 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 of 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 acquanted with FDA's legal requirements, before contracting for a shipment, [d] requesting assitance from the FDA District Office responsible for the port of entry, and [e] knowing the overall importing precedures.

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 this review one of four decisions is made: [a] release the lot, or [b] automatically detain 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] past history, [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 of a product. It involves actual physical examination of the product for: damage including storage or intransit 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 mandataory 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 whithout physical examination. This importer, foreign processor, and its product will remain

on 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 step(s) 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 spesific fish/fishery product(s), rather than the importer, may be subject to dentention 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 or 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 list 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 or 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 applicable provisions of Sec. 123.9 (record keeping requirement).

(d) Determination of compliance. There must be evidence that all fish and fishery products offered for entry imto 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 infrastrucuture, 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 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 intervertion 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 producers, 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 export, 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. without HACCP verification as long as the importer can provide the FDA with the date of production. Anycountry exporting fish products to North America or Europe now 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(s), importers will not be permitted to accept the imported products. The demand from importing countries is 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's adoption as a system for assuring the safety of foods and 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.

The HACCP is compatible with the implementation of such quality management system and is 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 importing and producing, 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 conditions under which these foods are manufactured will result in

safe food. It is known that food processing is only one link in the food chain. It is intention of the program to focus on this link. The program will be designed 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 to processors, governments, consumers, and beyond. Processors have no choice other than fully commited to HACCP implementation if they wish to enter export markets. It improves the quality control of the process. As a management tool, it provides the best control over the safety of the product giving an assurance that it will meet the importing countries requirements. It also promotes better utilization of resources and more timely response to problems. At the end, it will save work and money because of less product will be out of specification, fewer claims, recalls, and/or product destruction. It encourages employees to take a proactive role in quality maintenance. In turn, it will brings out personal pride in what they are doing and increase employee participation and job satisfaction.

When the PFSA program is fully implemented, the government will have the ability to direct its limited resources towards those plants not currently able to process product under HACCP. This will allow the government to direct its resources in a sequential fashion, from high risk to low risk, depending on product type, establishment compliance, or plant complexity. The program will also bring closer communication between inspection and industry staff. This 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 program 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 PFSA program principles are consistent with the principles and application of HACCP system developed by the *Codex Alimentarius Commision* 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 PFSA 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 export due to failure in meeting food safety requirement by importing country such as the U.S., it is critical for Indonesia to come up with a systematic and technically effective program to overcome the problem. The Indonesian food scientists strongly believe that: [a] the responsibility for food safety must be properly shared by all participants in the food chain from the farm to the consumer; [b] an information exchange system on food safety have to be establish to enable direct involvement of consumers, industry, regulators, and experts to timely respond with new demand; and [c] international consumer confidence has to be maintained to succeed in the global market place.

To maintain and/or expand our international markets it is essential to have inspection processes in place acceptable to those countries to which we export. We and the food industry wish to be proactive in regard to food safety and will maintain effective contact with importing countries to ensure the acceptance of our PFSA program. In addition, the producers and processors from the registered establishments will have to demonstrate that their products meet the safety and quality demanded by domestic markets.

In brief, the system on which the PFSA is based is essentially a preventative approach to food safety. The rationale is to design a system that has checks throughout the manufacturing process so that the finished product is in compliance with the food safety regulations. Most of food companies will find that many of the things required in a HACCP system are already in place and operable in their plants. The HACCP approach takes isolated quality control procedures at various points in the process, and put them all together as a system. All points interrelate and interlock in a manner that prevents the system from going out of specification and causing hazard without the information being picked up through the monitoring systems. A HACCP plan will be developed for each food production line in a registered establishment and tailored to its individual product processing and distribution conditions. Since fish and seafood products are more frequently found to be out of food safety requirements, this industry will be given a first priority.

With the PFSA approach, the food industry would be responsible for the implementation and monitoring programs developed by industry, tailored to its own needs

according to well defined parameters. Under the PFSA 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 point (CCP) for each production line along with adressing 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 PFSA 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 plant personnel are responsible for controlling, monitoring, and keeping accurate records for each CCP and ensuring proper procedurers 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 lineworkers.
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 personnels 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 body 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.

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 products 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.

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