

SECTION 7. PLANNING THE 2002 FSIS IMPORT MONITORING PLAN: PESTICIDES

PHASE I - GENERATING AND RANKING LIST OF CANDIDATE COMPOUNDS

The list of compounds of concern for the Import Monitoring Plan is identical to that for the Domestic Monitoring Plan (see Section 6, Table 6.1). Furthermore, in ranking pesticides for inclusion in the Import Monitoring Plan, FSIS chose to employ the ranking scores generated for the Domestic Monitoring Plan (see Section 6), because FSIS does not have sufficient historical data on pesticides in imported products to predict their violation rates. However, if FSIS has reason to believe that a compound is being misused in a foreign country then it would add that compound/country pair to the Import Monitoring Plan.

PHASE II - SELECTING PESTICIDES FOR INCLUSION IN THE 2002 IMPORT MONITORING PLAN

The list of high priority compounds chosen for the Import Monitoring Plan by the Surveillance Advisory Team (SAT) was the same as that for the domestic plan. Once the high-priority compounds and compound classes had been identified, FSIS applied non-public health considerations to determine which compounds FSIS should sample. The principal non-public health factor was the availability of laboratory resources, especially the availability of appropriate analytical methods within the FSIS laboratories. Based on these constraints, only the chlorinated hydrocarbon/chlorinated organophosphate (CHC/COP)¹ compound class can be included in the NRP. The compounds that can be identified by this multiresidue method are listed in Section 6, Phase II, p 76.

PHASE III - IDENTIFYING THE COMPOUND/PRODUCT CLASS PAIRS

As with the domestic program, the FSIS decided to sample for CHC's and COP's in all product classes as a means of monitoring incidents of accidental contamination.

PHASE IV - ALLOCATION OF SAMPLING RESOURCES

ALLOCATION OF SAMPLING RESOURCES AMONG DIFFERENT PRODUCT CLASSES

EGG PRODUCTS

The samples for residue analysis for imported egg products are selected in a different manner than the other product classes. As stated in Section 2, in order to establish a history of compliance with the U.S. requirements for each egg product category for egg products, the first ten shipments from individual foreign establishments are subjected to 100 % reinspection. If the egg product is in compliance the rate of

¹Phenylbutazone is also detected by this method.

inspection is reduced to a random selection of one reinspection out of eight product lots from each foreign establishment. This reinspection rate will continue as long as the product is in compliance.

ANIMAL PRODUCT CLASSES

Table 5.2, *Estimated Annual Amount (in lbs.) of Product Imported*, lists the estimated amounts of all product classes imported into the U.S. and the percentage of each of the product classes. The percentage of each product class imported annually is calculated using the following formula:

$$\% \text{ Product Class Imported } (P_C) = \frac{\text{Amount Product Class Imported}}{\text{Total Product Imported}} \times 100 \quad (7.1)$$

The relative sampling priority is obtained by multiplying the percent product class imported (P_C) by the pesticide scores obtained in Phase I, using the following equation:

$$\text{Relative Sampling Priority} = (P_C) \times \text{Pesticide Score} \quad (7.2)$$

Based on the scores, one of the following sampling options is chosen: (1) very high regulatory concern (460 analyses/year); (2) high regulatory concern (300 analyses/year); (3) moderate regulatory concern (230 samples/year); or (4) low regulatory concern (90 samples/year). This is indicated in Table 7.1, *Number of Pesticide Samples/Product Class*, in the column labeled “Number of Samples.”

Starting this year, FSIS in its Import Monitoring Plan will not test (1) processed products from eligible foreign countries that also ship fresh products to the United States; and (2) processed products from countries that source all their raw materials from other foreign countries that are eligible to ship fresh products and are actively exporting to the United States. Processed chicken products from Hong Kong and Mexico, processed turkey products from Hong Kong, and processed pork products from Belgium will not be sampled since the raw materials used are from countries that are eligible to ship raw products to the U.S.

As stated in Section 5, if a product class represents less than one percent (by weight) of total combined U.S. imports of meat, poultry and egg products, then the total number of samples analyzed for any compound or compound class is eight times the number of countries from which that product is imported. For example, if processed turkey is imported from only three countries and the amount imported is 0.10 % relative to total U.S. imports, 24 samples of processed turkey would be taken for each analysis, eight from each country.

The adjusted number of samples is listed in Table 7.1, *Number of Pesticide Samples/Product Class*, in the column labeled “Adjusted Number of Samples.” The final number of samples for a compound/product class is obtained after the allocation of samples among different countries is completed. The final number of samples is listed in Table 7.1 in the column labeled “Final Number of Samples.” The numbers in columns labeled “Adjusted Number of Samples” and “Final Number of Samples” may vary slightly because of the rounding upwards or downwards of the samples.

Allocation of Samples among Different Countries

The total number of samples chosen for each compound/product class pair was subdivided among the different countries. The number of samples for each country is based on the relative amount of total product class imported: less than one percent and greater than one percent.

Allocation of Samples in Product Classes Whose Total Volume Imported is Less Than 1%

As stated above, if the amount of an import product class was less than 1%, eight samples per compound/compound class were taken from each country. The relative amounts of fresh chicken, fresh goat, processed beef/pork, fresh and processed turkey, other fresh and processed fowl, processed varied combination, processed lamb/mutton, and processed veal was less than 1%. Also, as stated above, if a country is exporting both fresh and processed products or sources all their raw materials from eligible sources then no residue samples will be scheduled for the processed products from that country. The numbers of samples per country per product class for each compound/compound class are listed in Tables 7.2 - 7.11.

Allocation if Samples in Product Classes Whose Total Volume Imported is Greater Than 1%

For major product classes, the number of samples was allocated to each country depending upon the relative amount of product imported from that country. Table 5.3, *Estimated Annual Amount (in lbs.) of Product Imported/Country*, lists the amount of product imported from each country. The percent of a product class imported from a country was calculated as follows and is in Table 5.4, *Relative Annual Amount of Product Imported/Country*.

$$\text{Percent Product Class Imported per Country (P}_{C/C}) = \frac{\text{Amount of Product Class from Country}}{\text{Total Amount of Product Class}} \times 100 \quad (7.3)$$

Based upon the relative amount of product class imported per country, the number of samples that should be taken at the port of entry was calculated using the following formula:

$$\text{Unadjusted Number of Samples per Country (U}_{C/S}) = \text{Total Number of Samples} \times \frac{\text{P}_{C/C}}{100} \quad (7.4)$$

This is indicated in the column labeled “Unadjusted Number of Samples (U_{C/S}),” in Tables 7.12 to 7.18.

After the determining of the number of samples required from each country, each country with less than eight samples was assigned a minimum of eight samples. This is indicated in the column labeled “Adjustment # 1” in Tables 7.11 to 7.19. The results of this adjustment are in the column labeled “Initial Adj#.” If the total number of samples for a compound/product class resulted in more than the total number of samples allocated to that compound/product class pair, then a second adjustment then had to be made so that the total number of samples would be within an allocated number. This adjustment was made only to those countries from which greater than eight samples were to be taken. This was done using the following equation:

$$\text{Number of Samples after Adjustment \# 2} = (U_{C/S}) - \frac{[N \times (P_{C/C})]}{(P_{T/C})} \quad (7.5)$$

where,

$$N = (N_1) - (N_T)$$

N_1 = Total Number of Samples after Adjustment #1

N_T = Total Number of Samples Allocated

$P_{T/C}$ = Total Percent of Product Class from the Countries That Had Greater Than Eight Samples

$P_{C/C}$ = Percent Product Class Imported per Country

$U_{C/S}$ = Unadjusted Number of Samples

As mentioned above, if a country is exporting both fresh and processed products or sources all their raw materials from eligible sources then no residue samples will be processed from that country. The final numbers of products sampled are indicated in Tables 7.11 - 7.18, in the column labeled "Final Adj.#."