

CRATES OF F

The perils of imported pr

On January 18, 1987, 720 cartons of Haitian mangoes arrived in Miami—one of approximately one million shipments of imported fresh fruits and vegetables that will enter the United States this year. It is an aspect of trade that could be quite literally doing us serious harm. This "notice of sampling," obtained through a Freedom of Information Act request, was completed by a Food and Drug Administration inspector as part of the agency's effort to monitor food imports for pesticide contamination. Twenty-five percent of the fruits we consume, and 6 percent of the vegetables, are imported. According to the General Accounting Office, imported produce is twice as likely to contain "illegal pesticide residues"—traces of banned pesticides or excessive amounts of approved ones—as domestic produce. Yet samples such as this are taken from less than 1 percent of all shipments entering the country.

The United States imports produce from nearly 100 countries. Much of this produce comes from poor countries where knowledge of proper pesticide use may be limited and regulations weak—or simply where export income is valued over compliance with U.S. health standards. These countries frequently serve as dumping grounds for carcinogenic U.S.-manufactured pesticides such as lindane, BHC, DDT, and dieldrin—"boomerang poisons" that have been banned here but enter our food supply through contaminated food imports. One third of all pesticides sold abroad by American companies are either banned, restricted, or unregistered for use at home. U.S. regulations are so lax that companies are not always required to disclose the destination of their pesticide exports.

The FDA allows the import of mangoes from Haiti and other Caribbean countries that use the fruit-fly pesticide ethylene dibromide (EDB), even though the poison is so harmful its use is banned domestically. The reason is less environmental than geopolitical. In 1985 the State Department urged the Environmental Protection Agency to "take another look" at its plans to ban all EDB-tainted imports: it suggested an exemption for Caribbean mangoes because of the region's "great strategic importance to the U.S." (Haiti exports about \$9 million worth of mangoes to the United States each year.) The proposed restriction was subsequently abandoned.

ENTRY DATA TAKEN FROM			DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION	
<input checked="" type="checkbox"/> ID Advance Notice	Number		NOTICE OF	
<input type="checkbox"/> Manifest	Date	1-18-87		
<input type="checkbox"/> IT Advance Notice	Commercial Invoice attached	Yes		
BILL OF LADING NO. 00783271650	PORT OF LADING P.A.P.	COUNTRY OR ORIGIN Haiti		
BROKER'S REF. NO. 13245	C.H. BOX NO. 746	VALUE OF ENTRY IN U.S. [REDACTED]		
FOR THE ACCOUNT OF	Consignee (Name, Address, Zip Code)	IMPORTER OF RECORD		
[REDACTED]	[REDACTED]	SAQUE		
Number of items sampled from this Entry	Related Sample Numbers	LEAD SAMPLE		
SAMPLE FDA NO.	778785A	REVIEWER		
PRODUCT	Mangoes	LABELING	QU	7
SAMPLE CONSISTS OF	1 box			
DATE COLLECTED	1/20/87	VALUE OF LOT SAMPLED	\$	ESTIM \$
<p>EXCEPT for the related sample numbers listed above, this importation</p> <p>MAY PROCEED Without FDA Examination</p> <p>This notice does not preclude action should the merchandise later be found violative.</p> <p>VALID ONLY IF SIGNED</p> <p>SIGNED _____ DATE _____</p> <p>FDA REPRESENTATIVE</p>				
<p>FORM FDA 70 is VARIABLE (3/81) PREVIOUS EDITION IS OBSOLETE.</p> <p>The sample number should be referred to in the above sample(s) and should be given to:</p> <p>Distribution - Importer of Record (Orig) - U.S. Customs - District File</p> <p>FORM FDA 712 (3/81) PREVIOUS EDITIONS ARE OBSOLETE</p>				

FRESH POISON

produce, by Richard Caplan

The "port of entry" is where the decision is made to sample a particular food shipment—providing, of course, that the FDA is on the job. In Miami, the FDA reviews each shipment to determine whether to take a sample—a patently sensible procedure, yet one that is not universally practiced. In Nogales, Arizona, for instance, where much of the Mexican produce sold in this country crosses the border, the FDA is not present two days a week. Shipments arriving on those days generally proceed without FDA review.

DEPARTMENT OF COMMERCE
INTERNATIONAL TRADE ADMINISTRATION
SAMPLING

Expiration Date: January 31, 1986.

746-0000494-4-1-18-87
ENTRY NO. AND DATE

PORT OF UNLOADING Miami	PORT OF ENTRY 5206	
CONTAINER NO.	IMPORTING VESSEL EASTERN	ARRIVAL DATE 1-18-87
(Name, Address, Zip Code)	MANUFACTURER/SHIPPER (Name, Address, Zip Code) J. M. B. CAZEU. P.A.P. Haiti	
(See above)	LOCATION OF LOT (For FDA examination) CONSIGNEES	DATE AVAILABLE 01-19-87
	PHONE NO.	

DATE REVIEWED: 1/20/87

QUANTITY (no., size, content) 20 CTNS.

MARKS (include B/L identity)

ESTIMATED COST OF SAMPLE

NOTICE OF SAMPLING

Samples will be taken from the above shipment under authority of the Federal Food, Drug, and Cosmetic Act, Section 801(a) merchandise must be held intact pending further written instructions from the Food and Drug Administration upon completion of examination of samples.

Food and Drug Administration will pay for the samples except a bill or voucher, provided such samples are not found to be illegal.

Sonia Hudson 1 20 87
for DISTRICT DIRECTOR OF CUSTOMS DATE

do not proceed after FDA sampling SBA

In all correspondence or inquiries regarding this bill, please refer to each item when submitting bill.

Because almost all imported mangoes contain ethylene dibromide, all mango shipments are sampled for the level of EDB, which cannot exceed the "safe" level of thirty parts per billion. But if the FDA has no reason to suspect the presence of a specific pesticide in a food import, it will generally use one of five multi-residue tests capable of detecting at most 123 of the 600 pesticides in use worldwide. At least thirty-three pesticides, for which the FDA requires continuous to periodic monitoring, cannot be detected by the standard multi-residue tests. Moreover, FDA risk classifications are based on outdated assessments by the EPA. In 1972 Congress required the EPA to reassess most agricultural pesticides using improved testing procedures. The reassessment is not expected to be completed before the twenty-first century.

Note that this inspector has crossed out the instructions to keep the shipment intact and has allowed these mangoes to proceed to market before the FDA's test results are known. Imported fresh fruits and vegetables, because they are perishables, are often allowed to be sold subject to recall if a sample is found to be contaminated. It takes about five days, however, to complete the test results—by then most contaminated produce has probably been consumed. The FDA relies entirely on the good-faith efforts of importers to recover contaminated shipments, but a 1986 study by the General Accounting Office revealed that 45 percent of contaminated samples were not recovered. There is little incentive to play by the rules since the FDA rarely levies fines against violators and even more rarely collects them.

Richard Caplan is assistant editor of World Policy Journal.