

TABLE 13.—DETENTION STEPS—Continued

Action	Hours/other	Cost ²
Product is denatured, or	8, Loss of value, ² Cost of denaturing, ² Reselling costs ² .	856
Goods are destroyed under Federal supervision	16, Loss of product ¹ .	

¹ These costs are calculated in table 14 which gives estimates of the numbers and estimated costs for detentions in 1994.

² Seizure can have a significantly higher value than that reflected in this table.

TABLE 14.—DETENTIONS IN 1994

Reason	Number of detentions	Quantity ¹	Dollars ¹	Detention disposition ²	Detention admin ³
Borates	25	21,484	1,827,173	183,017	112,350
C. botulinum	1	113,790	363,434	363,434	4,494
E.coli/coliforms	14	254,774	742,786	149,413	62,916
Histamines	2	98,023,014	1,361,714	273,199	8,988
Lead	2	102,188	87,440	9,044	8,988
Listeria/Other Pathogens	51	2,792,808	21,369,692	4,274,794	229,194
Mercury	11	7,338,900	12,720,272	1,272,327	49,434
Poisonous/Deleterious sub-nec	7	180,000	446,025	446,025	31,458
Salmonella/arizona	129	221,543,300	76,137,973	15,228,451	579,726
Staphylococci	6	55,810	199,550	40,766	26,964
Sulfites	23	713,653	8,100,620	810,362	103,362
Unsafe food additives—NEC	5	67,160	540,201	540,201	22,470
Total	276			23,591,033	1,240,344

¹ Quantity and dollars include the total amount of both detentions and automatic detentions and are shown to illustrate how detentions were calculated.

² Disposition included reshipping which was estimated to be 10 percent times the number of shipments (quantity) times the value per shipment (dollars/quantity); reconditioning which was estimated to be 20 percent of the value of the shipment (dollars) or destruction which was estimated to be 100 percent of the value of the shipment.

³ Administrative costs are estimated to be \$4,494 per detention, the sum of the first three rows of the previous table.

Assuming just half of these detentions are prevented by HACCP, benefits to the federal government and industry would be approximately \$12 million per year.

c. *Automatic detentions.* Automatic detentions place each lot of imported products on detention upon arrival at the border until the importer has demonstrated that the products do not violate the Federal Food, Drug, and Cosmetic Act. This is normally done by the importer hiring independent labs to sample each lot. Table 15 shows the number and types of relevant automatic detentions that took place in 1994.

TABLE 15.—AUTOMATIC DETENTIONS IN 1994

Reason	Number of automatic detentions	Sample cost ¹	Storage cost ²
Borates	53	\$132,500	\$182,717
C. botulinum	104	260,000	36,343
E.coli/coliforms	8	20,000	74,279
Histamines	63	157,500	136,171
Lead	1	2,500	8,744
Listeria/Other Pathogens	236	590,000	2,136,969
Mercury	397	992,500	1,272,027
Pesticide chlorothalanil	1	2,500	50
Poisonous and Deleterious sub-nec	4	10,000	44,603
Salmonella/arizona	759	1,897,500	7,613,797
Staphylococci	0	0	19,955
Sulfites	12	30,000	810,062
Underprocessed	3	7,500	15,454
Unsafe food additives—NEC	3	7,500	54,020
Total	1,644	4,110,000	12,405,191

¹ 1 Calculation of costs assumes that, for each product placed on automatic detention, 10 lots per year will be analyzed with 1 sample each at a cost of \$250 per sample.

² Assumes storage costs equals 10 percent of the stated value of the goods.

Again assuming that half of the above automatic detentions are eliminated

each year, then the benefits will be approximately \$6 million per year.

d. *Recalls.* The costs of recalls to a firm vary from inexpensive notification