

# U.S. FOOD IMPORT INDUSTRY ANNUAL REPORT

2023 EDITION

IMPORTERS FACING  
NEW ENFORCEMENT  
ENVIRONMENT

FREQUENT  
FSVP-RELATED  
QUESTIONS

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# AFI Chairman's Report

**JOHN SESSLER, JCS TRADECOM**



**T**he second of my one-year terms as chairman of AFI provided a great illustration of the scope of issues the association addresses and the breadth of products those issues impact. Ongoing geopolitical, economic and climate, problems continue to challenge our businesses daily. A measure of a successful organization is a strong team focusing on preparedness and response when confronted by unanticipated events in the marketplace. Olives, raisins, honey and olive oil, for example, all had issues that needed the type of assistance and expertise that only a strong, nimble association can provide and AFI and its sections continue to be the association that steps up to the plate.

It's not always staff or AFI members that discover the problem. The raisin issue was brought to AFI's attention by a non-member firm – a firm, which I'm happy to say, has since joined the association. It centered around a dramatic increase in failed USDA inspections. AFI was able to arrange a virtual and then an in-person meeting with key USDA personnel and it looks like the problem has been resolved.

The olives issue came to light when a foreign member spoke to a domestic member about a potentially devastating issue. Within days, a letter from AFI was drafted & delivered to a government official in the producing country alerting him to the huge impact the issue would create. While the letter itself didn't resolve the issue, there's no doubt an immediate call to action by a group in the exporters' largest market had an immediate favorable result.

Honey and olive oil are products that have stand-alone associations that are sections of AFI. The National Honey Packers and Dealers Association is dealing with the ongoing hassles related to an antidumping duty petition filed a couple of years ago and the North American Olive Oil Association continues its effort to establish a Research and Promotion Order for olive oil and to have FDA create a standard of identity for olive oil. The chairs of those sections address those and other issues in their reports a little further back in this publication.

I've been involved with AFI for many years and have seen it from multiple angles. I'm the first person to have served at one point as the NAOOA chairman and the chairman of AFI. It's given me a unique perspective because I've seen even more than most how the sections within the association benefit from the work of the other sections and how it all comes together under the AFI umbrella. The olive oil and honey sectors, for example, face several common issues. Sometimes

olive oil might have encountered the issue first; sometimes it's honey. Either way, both groups typically benefit from the work and contacts of the other section to get a jump-start on facing that issue. When you add the work and contacts from under the entire AFI umbrella, the jump start can be even greater.

It's also been extremely helpful over the years when the NAOOA or NHPDA has brought an issue to the attention of a government regulator or agency that AFI – because it has other members sharing similar products – strengthens the message by adding its voice and concerns as well.

I've seen, too, how members of the AFI Board of Directors – comprised of representatives of member companies from all sections within the organization – collectively work on behalf of the entire food import industry. Part of our mission is to ensure regulators, politicians and all others participating in the food business are fully aware that there's a vibrant, professional food import sector devoted to ensuring products from around the globe meet established safety and quality standards.

I'm glad I've been able to be as involved as I've been with the association and its sections. It feels good to be able to give something back to my industry. But it's also helped me and my company. Being active in the organization all but ensures you'll be abreast of and have indispensable insight on key issues and be aware of all our association's valuable offerings. As I've always believed, our business is relationship-driven and not merely measured by transactions. Our firm's AFI involvement has helped create and strengthen relationships with suppliers and customers. More importantly, I'm proudest of the strong personal bonds established with other AFI members, even if we don't handle the same products or markets.

As I did in my report last year, I'll encourage those from member companies to get the most from their membership by having as many people as you'd like added to receive the information sent by AFI. And for those from companies that aren't members, tell us what we're missing. Tell us what would help you to see the value of AFI membership. In the meantime, I encourage you to visit the AFI website – [www.afius.org](http://www.afius.org) – and see what AFI has to offer.

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# NAOOA Report

MOUNA AISSAOUI, POMPEIAN



I'm pleased to address you for the first time as the newly elected chairperson of the NAOOA. I'm proud to be the first woman who has held this role and look forward to the challenges in the year to come.

The association is on the cusp of achieving long-sought-after success on some of our principal strategic objectives. Last July, we filed a new petition for a standard of identity for olive oils and olive pomace oils with the U.S. Food and Drug Administration. Our last three attempts at filing a petition languished without any action by FDA. This time, however, we are optimistic that things are different. Thanks to our efforts to build bridges with the domestic producer industry over the past few years by focusing on our common interests, we succeeded in filing this petition jointly with the American Olive Oil Producers Association and Deoleo (who had resigned from NAOOA in 2021). The joint nature of the petition gives us a far greater chance of convincing FDA to commence the rulemaking process.

Another reason we feel the petition stands a good chance of success is that FDA has been under intense public scrutiny recently over failures in how it administered its food programs (as opposed to drugs), which many have been characterized by inaction and incompetence. As a result, there appears to be pressure on FDA to accomplish positive things in 2023. The pending olive oil petition would be a big success for FDA in addressing the confusion and fear of being cheated that concerns many olive oil consumers. In fact, during the last week of February, the petitioners received some encouraging news: a detailed letter from FDA laying out additional requests for information and a suggestion for a meeting with FDA administrators. We remain hopeful that FDA will agree to commence a rulemaking and publish a proposed olive oil standard of identity in the Federal Register by the end of the year.

In the past twelve months, we've also ramped up our efforts to put together a viable petition to the U.S. Department of Agriculture's Agricultural Marketing Service to establish a research and promotion board for olive oil. Like the standard of identity petition, this effort has also involved reaching across the country to get supporters among the domestic production industry, which is important from USDA's perspective in deciding whether to move forward. Similarly, we're hopeful a petition can be filed in the first half of the year.

As a product category, olive oil continues to enjoy the fruits of research extolling its health benefits. Starbucks' recent announcement of its new products that incorporate extra virgin olive oil has resulted in nearly unprecedented positive publicity about EVOO. In creating a separate section within the NAOOA last year for specialty olive oil oils, which we have called the Extra Virgin Alliance, our objectives were to promote the specialty olive oil category in a way that will at the same time educate consumers about olive oil in general and simultaneously promote and up-sell the category at large, as has been done with other categories that developed specialty niches such as wine, cheese, beer, chocolate and coffee. It's ironic that Starbucks—the company that drove the premiumization of the coffee category—has “crossed over” to help accelerate that effort in the olive oil category.

Among the other objectives in creating the specialty section was to help promote NAOOA as a representative of the whole industry, not just of the big brand or commodity segments as has been its reputation. Not only will this help expand membership (which it has done, with approximately 10 new members joining as a result of the establishment of the new section, including the leading Italian brand Monini and American producer McEvoy Ranch), but it also helps in efforts to build bridges between to seg-

ments of the domestic producers, which is important to NAOOA's primary strategic initiatives, the success of which will depend domestic support.

The bad news for the olive oil industry this year stems from the devastating drought in southern Europe in particular last year, which has severely impacted production—estimated to be down by as much as 25% over the prior year. As a result, the industry is struggling with cost pressures and potentially limited supply. It's situations like this that make establishing a research and promotion order all the more important. Had the order been in place, the industry would have the funding to explain the situation to consumers and better educate the consumer as to olive oil's true value relative to the cost.

Indeed, one of the olive oil “values” of which consumers remain relatively unaware but care deeply about is in fact related to the present drought crisis—climate change and sustainability. With the limited budget available to us, olive oil sustainability, particularly as it relates to other cooking oils, will be a focus of much of the NAOOA's messaging in 2023 and in years to come. As a permanent crop—indeed, the world's largest non-tropical permanent crop—the cultivation of olives has several sustainability advantages over seed oil crops which by contrast have shallow roots and must be re-planted every year. The advantages of permanent crops such as olives include carbon sequestration, carbon balance, low water use, limited depletion of soil nutrients and the promotion of biodiversity.

We will continue to develop the olive oil story for American consumers who deserve to know that not only is cooking with olive oil good for them, it's good for the planet, too.





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# Processed Foods Section Report

**BRENT DANIELSON**, SCHREIBER FOODS INTERNATIONAL

**W**e all know never to underestimate the impact a message from a customer can have. Our section proved that within the past year. In June 2022, a court in Greece issued a ruling with potentially drastic implications for the olive sector. The ruling mandated the restriction of usage of the name “Kalamata” to olives grown in the Messenia region of Greece.

This happened immediately before the Fancy Food Show in New York, so AFI President Bob Bauer and AFI Chairman John Sessler were able to set up meetings at the show with U.S. importers and Greek exporters, including the president of Panhellenic Association of Manufacturers, Packers and Exporters of Table Olives, the olive industry’s trade association in Greece. By the second day of the show, a letter was written and ready for delivery to officials in Greece.

The U.S. imports more than 30,000 tons of Kalamata olives annually at a value of at least \$100 million, so this was not a small issue. Consumers in the U.S. are familiar with and look for the Kalamata name when buying olives. The court decision would have meant less than 2 percent of the Kalamata olives arriving in the U.S. today could continue to be called Kalamata olives. AFI said the ensuing confusion that would happen when consumers saw the same olives with a different name would be a huge detriment to sales.

Additionally, AFI said, Greek producers exporting retail packages of Kalamata

olives would be further punished. They wouldn’t have been able to label the product as Kalamata olives. Meanwhile, those exporting in bulk would have been able to label the product in accordance with the Greek regulations by using a different name. However, when that product arrived in the U.S., those packing the product would legally have been allowed to label the product as Kalamata olives.

AFI made other points as well and closed with a request that the Ministry of Agriculture take immediate action to avert the consequences of the court’s decision.

Things didn’t happen overnight but there’s no doubt a letter from an association representing importers in Greece’s largest export market for Kalamata olives helped stress the importance of this issue. By approximately the end of the summer, the situation was rectified.

I closed my report last year by saying that having an association in place creates the infrastructure to quickly educate the trade about the issues and create a plan to mount a defense – another example of the value AFI brings to our sector. This olives issue further illustrates that point.

Last year I was referring to the antidumping duty petitions filed on preserved mushrooms from Poland, the Netherlands, Spain and France and another antidumping (and countervailing) duty petition filed on white grape juice concentrate from Argentina.

The mushroom filing impacts retail pack only and no AFI members produce or

import the targeted juice concentrate but the fact that AFI exists provided all those who would or might be affected to quickly get important information and then, for the mushroom sector, pool resources. That pooling of resources led to a unified message and significant cost savings for all involved.

Antidumping duty filings create a problem the impacted sector must monitor for many years. Almost all filings result in some sort of punitive duty being imposed and then it takes ongoing coordination between U.S. importers and foreign suppliers to take steps available to try to lower or eliminate the duties over time.

AFI-member companies – U.S. importers and foreign suppliers alike – had a significant competitive advantage over non-member companies in all three situations noted above. We were armed with information to gauge each issue’s impact on our company, we received regular updates on the status of the issue and critical dates involved with all three and we had a vehicle through which we could work together that resulted in cost savings and a cohesive message.

My time as section chairman is ending. I hope the report by the incoming Processed Foods Section Chairman in next year’s edition of this publication doesn’t include details of yet another issue we’ve had to face. But it’s good to know that if something arises, AFI will be out in front of it.





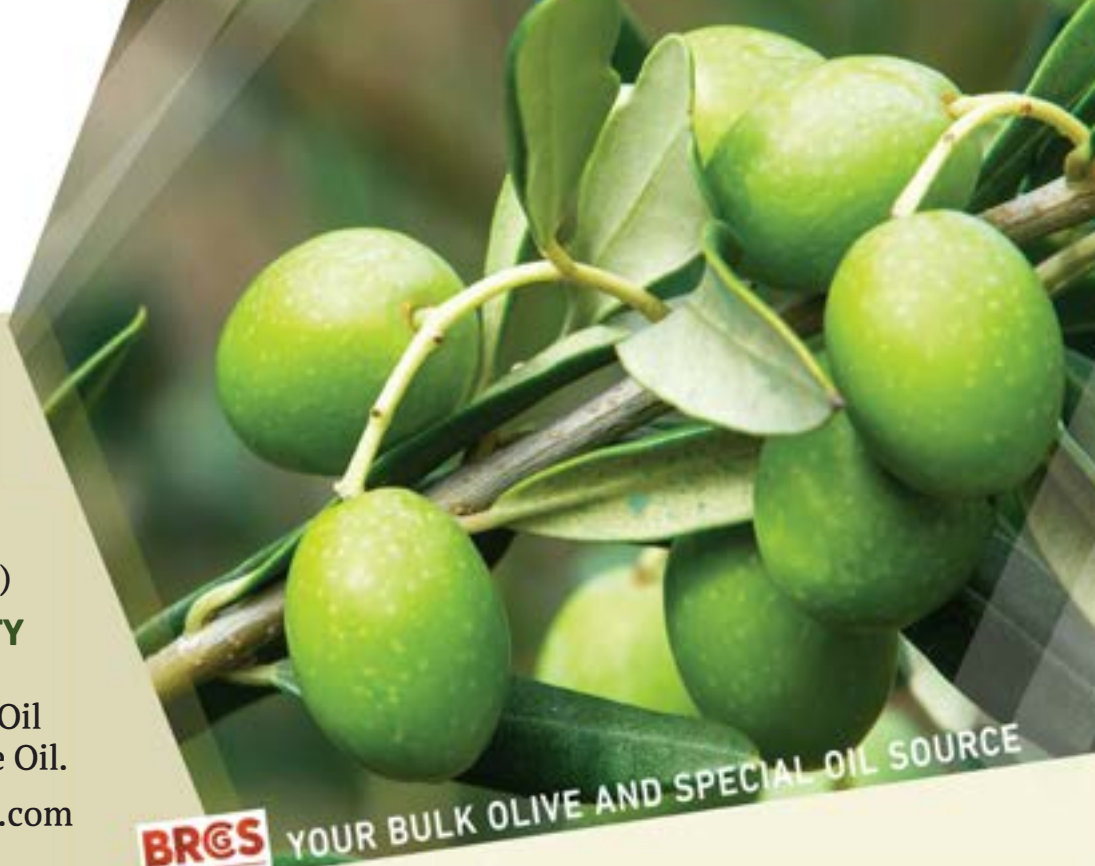
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As if the supply chain issues were not difficult enough, 2022 saw further disruption to the supply chain due to Russia's invasion of Ukraine. This had a serious impact on the sunflower oil market from Europe and olive oil from Turkey. AMD continues to work with our customers to find solutions to supply and logistics issues and ensure uninterrupted service. We'd be happy to work with you, too.

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# Nut and Agricultural Products Section REPORT

**RICHARD ROSENBLATT, RICHARD FRANCO AGENCY**

**W**e expect to share – perhaps even before most people read this report – drafts of updates to AFI’s product specifications – cashew kernels, Brazil nuts, hazelnuts and dried apricots. The development of these specifications has been one of the greatest contributions by the Nut & Agricultural Products section to the industry.

The AFI specs were needed to address ongoing quality disagreements. The creation of the specifications put an end to many disputes regarding quality because the parameters were in black and white and contracts started to include language referring to the AFI specifications. The specs quickly became the standards against which those products were sold, not only to U.S. buyers but to buyers around the world. Still today, most contracts and/or purchase orders involving those four products include language about meeting the AFI specs.

The standards were adopted after much input from both a scientific and commercial standpoint, consolidating USDA, FDA, Codex and U.S. trade standards into the effective worldwide standard.

A couple of years ago, AFI created task forces to consider updates to the existing AFI standards and to consider creating one for macadamia nuts. It was decided that since the cashew specification likely involved the most updates, it would be done first.

After several rounds of revisions, the task force presented the latest cashew specification draft during a recent virtual meeting. It’s important to note that almost all the modifications are

not changes to technical parameters; they’re edits to address areas needing clarification. The goal of the task force members is to make the standard easier to read by reformatting and rewording any portions of the document with ambiguous wording and to correct some small but conspicuous omissions, such as peroxide value, free fatty acid and shelf life. There were enough changes along those lines that a side-by-side comparison isn’t possible, another reason the task force has shared multiple updates.

During the recent virtual meeting, we received input from several people who hadn’t brought up concerns in the past. So, as I write this, the task force is planning to meet again to review that input and incorporate the suggested changes into what is hoped is a final version of an update.

It’s important to note that no change to an AFI spec is ever made without seeking input from importers and suppliers of the product. The goal is to give all interested parties, including trade associations in producing countries, the opportunity to provide input to ensure the suggested changes are valid and attainable. The final step in the process is a vote by the membership.

All four standards are available on the Resources section of the AFI website: [www.afi.us.org](http://www.afi.us.org). Updated versions will appear on the site as soon they become final.

I encourage all reading this to provide input and vote to approve the

amendments if they feel that the amendments represent incremental improvement! Even if a specification has been updated before you read it, we want to hear from you if you think we’ve missed something. We’re not a government agency, so we can make changes more regularly – as the need arises. What’s important to us is that we continue to make progress in clarifying the specifications to most-accurately reflect the understanding and expectations of the market.

Working on industry specifications is something we can control. We know the products. We know what quality parameters are needed. As discussed in other places in this publication, we’ve all been faced and will continue to face for the foreseeable future with things out of our control. It’s important we work together to address things that we can.

My family’s company has a long history of active participation in AFI; it’s helped us create and strengthen relationships and it’s ensured we were aware of and had the chance to provide input on issues impacting our industry and company. I look forward to another year as section chair and continuing to offer mine and my firm’s input. In particular, I’m looking forward to seeing the standard update process continue and hope next year’s version of this report is speaking about a process that’s finished or nearly finished.



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# NHPDA REPORT

ANDY SARGEANTSON, SUNLAND TRADING

Since late November 2021, the National Honey Packers and Dealers Association and the honey industry as a whole have been learning how to operate within the confines of antidumping and countervailing duties on four main countries of supply – Argentina, Brazil, India and Vietnam.

The first period of review ends on May 31, 2023 and the market has changed considerably over the course of the review period. As I am sure many AFI industries have experienced, Covid-related demand, supply disruptions and transportation costs created a large bubble for prices. On top of all those things, the honey industry had the added impact of new duties. Now that demand has normalized and perhaps lessened because of the global recession, along with supply chains and transportation costs normalizing, prices have fallen precipitously throughout the last 6-9 months.

Antidumping and countervailing duties add a layer of significant risk for importers. Duty deposits are held by Customs

and Border Protection at the time of entry based on the announced duty rate. The Department of Commerce then reviews entries during a defined period, taking almost a year to do so - and then can liquidate your entry at a revised rate that could be higher than the original deposit rate. It can be years until an importer knows its actual costs. The actual cost basis could be far higher than expected, potentially so high that paying the final duty would put their firm out of business. In order to mitigate this risk, importers and exporters work with lawyers and consultants to ensure that it is unlikely the DOC will make upward duty revisions.

In addition to the complexities surrounding antidumping duties, the global industry continues to fight against adulteration. The European Commission and JRC announced results from their 'From the Hives' supply chain and honey authenticity project. 46 percent of 320 samples taken tested suspicious for adulteration, while around 50-60 percent of exporters and importers handled suspicious consignments. In the U.S.,

the NHPDA has already been working proactively with FDA to modernize and add additional authenticity tests at port of entry. We have scheduled an additional meeting for this June in Washington D.C., with hopes of meeting with relevant government agencies on the topic of adulteration.

Through the NHPDA, member companies have access to legal help and resources needed to operate within a very challenging working environment. It would be impossible to independently tackle both antidumping duties and global honey quality issues. The organization also looks out for members' best interests across a variety of fronts. For example, we are currently combatting a constant stream of products that falsely label or advertise their product as containing honey when in fact honey is not listed on the ingredient statement. The issues that face our industry are numerous, but through the NHPDA we are able to work together towards better outcomes for honey packers and importers.



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# Food Importers Facing New Enforcement Environment

## FOR FOREIGN SUPPLIER VERIFICATION PROGRAMS

DEBORAH STERN & DOMENIC VENEZIANO

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More than a decade after the Food and Drug Administration first started requiring food importers to implement foreign supplier verification programs, the clock is now ticking for importers to avoid consequences for noncompliance as FDA turns its full attention to enforcement.

Under the Food Safety Modernization Act enacted in 2011, U.S. importers must develop, maintain and follow an FSVP for each food from each foreign supplier that they import into the U.S. FSVPs must provide adequate assurance that the foreign supplier is producing the food using processes and procedures that provide at least the same level of public health protection as those required under section 418 (hazard analysis and risk-based preventative controls) or section 419 (standards for produce safety) of the U.S. Food, Drug, and Cosmetic Act. Importers must also ensure that the product is not adulterated or misbranded in accordance with sections 402 and 403(w) of the act.

When FDA finds that an importer has violated the agency's FSVP regulations it issues a warning letter, which comprises the first notice of noncompliance and allows the importer a set period to correct the violation. If the importer does not act promptly, FDA may place it on an import alert, which allows the agency to refuse imports of subject goods.

Even though FSVP requirements have been in place for many years, the most-recent report from FDA indicates that failing to develop an FSVP still ranks as the most-common violation. Also frequently seen are problems with:

- Establishing adequate written procedures to ensure that foods are imported only from approved foreign suppliers
- Conducting foreign supplier verification activities
- Documenting evaluations (or the review of third-party evaluations) to determine a foreign supplier's performance and the risk posed by the imported food
- The frequency of verification activities that seek to assure the compliance of imported foods
- Identifying hazards requiring controls in a hazard analysis

One of the possible explanations for these continued problems is that FDA enforcement has been less-than-robust. However, that may be about to change.

In January 2023, FDA made available its final guidance on how food importers can comply with FSVP requirements. Since then, the agency has increased its inspectional presence and plans to do more inspections than in 2022.

With FDA now turning its full attention to enforcement, importers should act quickly to meet any and all FSVP requirements they have not yet complied with. Failure to do so could result in measures that could damage their reputation or even jeopardize their business.

### About the Authors

Deborah Stern is a member in the Import and Export Practice Group of Sandler, Travis & Rosenberg, P.A., resident in the Miami office. She advises domestic and multinational clients on both U.S. and foreign customs compliance and other trade matters. She concentrates her practice in traditional customs areas, such as tariff classification, seizures and penalties, country of origin marking, valuation, trademark infringement, broker compliance, bonded warehouses, government procurement, trade preference programs and free trade agreements, as well as the World Customs Organization's Harmonized System.

Domenic Veneziano provides advice on the importation of FDA-regulated commodities and the resolution of problems that may occur as an independent consultant to Sandler, Travis & Rosenberg, P.A. He also evaluates medical device and food facilities to determine compliance with good manufacturing practice regulations and the Food Safety Modernization Act and assists clients in correcting any deviations found during FDA inspections or third-party audits. He served as director of the FDA's Division of Import Operations for more than 10 years and was a frequent speaker at AFI events while in that role.

### About Sandler, Travis & Rosenberg, P.A.

Sandler, Travis & Rosenberg, P.A. is a premier international trade law and government relations firm for customs, import and export matters. The firm has been a member of the Association of Food Industries for 35+ years.



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# Common FSVP-Related Questions

## AFI STAFF REPORT

As the U.S. food import industry's trade association, AFI staff members frequently field questions about the Foreign Supplier Verification Programs regulation. We're highlighting some of the most frequently asked questions, taking the answers directly from FDA's recently issued final guidance document on FSVP – though we've taken the liberty of taking out some of the government-speak and combining some questions. Please note that even though it's referred to as a final document, updates can still happen.

**Q: How do I determine if I am an importer of a food for the purposes of the FSVP regulation (FSVP importer) and must the FSVP importer be in the U.S.?**

**A:** You are the FSVP importer if you are the U.S. owner or consignee of an article of food that is being offered for import into the United States. If there is no U.S. owner or consignee of an article of food at the time of U.S. entry, the FSVP importer is the U.S. agent or representative of the foreign owner or consignee at the time of entry, as confirmed in a signed statement of consent to serve as the importer under the FSVP regulation.

The FSVP importer must be located in the United States. This applies whether you are the U.S. owner or consignee of the food at the time of entry or the U.S. agent or representative of the foreign owner or consignee at the time of entry. An FSVP importer could be a person who resides in the United States or maintains a place of business in the United States. It would not be sufficient to merely have a mailbox, answering service or some other place in the United States where the importer is not physically present.

**Q: What if multiple entities meet the definition of "importer" for a particular food?**

**A:** In some cases there might be multiple entities that meet the "importer" definition for the same line of an entry of food offered for import into the United States. For example, a U.S. company might purchase olive oil manufactured in Italy and, at the time of entry, have entered into an agreement to re-sell the olive oil to a U.S. retail store after the product has entered the United States. In this case, both the U.S. purchaser and the retail store might meet the definition of importer. When there are multiple entities that meet the "importer" definition, these entities will need to determine who will be responsible for meeting the FSVP requirements.

**Q: Can an entity who is not the FSVP importer assume the importer's responsibilities for developing, maintaining, and following the FSVP regulation?**

**A:** No. The FSVP importer can identify qualified individuals to perform certain FSVP activities on the importer's behalf – in some circumstances, provided that the importer conducts a required review and assessment of the individual's activities. But the FSVP importer is the entity with the responsibility for developing, maintaining, and following the FSVP regulation.

**Q: Would a U.S. retailer that places a purchase order with a U.S.-based food distributor be considered the "U.S. owner or consignee" if the retailer does not specify the source of the food and the distributor is the entity that purchases the food directly from the foreign supplier?**

**A:** If the retailer does not direct the U.S.-based distributor to purchase the food from a particular source or sources, the retailer would not be the "U.S. owner or consignee." For example, if a retailer places a purchase order for bell peppers from a U.S.-based distributor without specifying the source of the peppers, the retailer would not own, have purchased or have agreed in writing to purchase the food. The retailer would have only placed an order directing the distributor to obtain peppers, leaving the decision about the source of the peppers to the distributor. At the time of entry, the distributor is the entity that purchased the peppers. Therefore, the distributor would meet the "U.S. owner or consignee" definition.

**Q: Who is the foreign supplier of a food?**

**A:** The foreign supplier of a food is the establishment that manufactures/processes the food, raises the animal or grows the food that is exported to the United States without further manufacturing/processing by another establishment, except for further manufacturing/processing that consists solely of the addition of labeling or any similar activity of a de minimis nature. Because of this, your foreign supplier might not be the entity from which you directly obtain the food you import. If you obtain a food from a foreign warehouse, distributor, broker or other entity that does not perform any manufacturing/processing of a more-than-de minimis nature, the foreign supplier of the food would be the last entity in the foreign

supply chain that conducts significant manufacturing/processing of the food.

**Q: May an entity that only packs or holds food be a foreign supplier?**

**A:** No. Although an establishment that only packs or holds food might be a food facility that is required to register with FDA, it is not a foreign supplier. Packing, cooling and holding performed by a packing house (that only packs and holds produce and cools the produce incidental to packing and holding) would not make the packing house the foreign supplier, because these activities would not be considered manufacturing/processing but only packing and holding. Waxing, sorting, culling, conveying, and storing of RACs would generally be considered packing or holding.

**Q: Under what circumstances is a food that I import for research or evaluation exempt from the FSVP regulation? What does "research or evaluation" of an imported food mean?**

**A:** The FSVP regulation does not apply to food you import for research or evaluation use, provided that:

- The food is not intended for retail sale and is not sold or distributed to the public;
- The food is labeled with the statement, "Food for research or evaluation use;"
- The food is imported in a small quantity that is consistent with a research, analysis, or quality assurance purpose, the food is used only for this purpose, and any unused quantity is properly disposed of; and
- When filing entry for the food with CBP, the food is accompanied by an electronic declaration that the food will be used for research or evaluation purposes and will not be sold or distributed to the public.

You should take steps to ensure that the label statement "Food for research or evaluation use" is securely attached to the food so that it remains on the food until the food is used for research or evaluation. You should ensure that the label statement is not removed to facilitate sale or distribution of the food to the public.

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Research or evaluation of a food for humans may involve analyzing food for characteristics such as protein or fat content, testing or observing physical characteristics such as color or texture and sensory analysis or evaluation, such as organoleptic analyses for testing the quality of tea. It may also include research for marketing purposes.

**Q: Does the exemption for food for research or evaluation include food imported for consumption or distribution at trade shows?**

**A:** As the U.S. food import industry's trade association, AFI staff members frequently field questions about the Foreign Supplier Verification Programs regulation. We're highlighting some of the most frequently asked questions, taking the answers directly from FDA's recently issued final guidance document on FSVP – though we've taken the liberty of taking out some of the government-speak and combining some questions. Please note that even though it's referred to as a final document, updates can still happen. Generally, no. Because food imported for consumption at trade shows typically is sold or distributed to the public generally (i.e., anyone who attends the trade show), exempting such food from the FSVP regulation would be inconsistent with the exemption provisions for food imported for research or evaluation. However, the exemption for research or evaluation would apply to food used in a defined study, conducted during a trade show, of a food involving a discrete set of test subjects who have agreed to participate in the study. In such a circumstance, we would not consider the food to be sold or distributed to the general public.

**Q: How do I indicate at entry that a food is exempt from the FSVP regulation?**

**A:** When filing entry with CBP, the filer should transmit the Affirmation of Compliance code "FSX" for the following foods that are exempt from the FSVP regulation:

- Juice and fish and fishery products and certain ingredients for such products that are exempt from FSVP in accordance with 21 CFR 1.501(b);
- Food imported for personal consumption that is exempt from FSVP in accordance with 21 CFR 1.501(d);
- Alcoholic beverages, alcoholic beverage ingredients, and certain non-alcohol foods that are exempt from FSVP in accordance with 21 CFR 1.501(e);
- Food that is transshipped through the United States that is not subject to FSVP in accordance with 21 CFR 1.501(f)(1);

- Food that is imported for processing and export that is not subject to FSVP in accordance with 21 CFR 1.501(f)(2);
- U.S. food returned that is not subject to FSVP in accordance with 21 CFR 1.501(g); and
- Certain meat, poultry, and egg products that are not subject to FSVP in accordance with 21 CFR 1.501(h). (Regulated by USDA.)

For food imported for research or evaluation that is exempt from FSVP in accordance with 21 CFR 1501(c), the filer should transmit the Affirmation of Compliance code "RNE" instead of "FSX." If the food is not subject to the FSVP regulation because it is "U.S. food returned," the filer should also specify the United States as the FDA Country of Production in the entry documentation.

**Q: Is the U.S. agent or representative for FSVP purposes the same as the U.S. agent for purposes of registration of a foreign food facility?**

**A:** A U.S. agent or representative of a foreign owner or consignee for FSVP could be but is not required to be the same person as the U.S. agent of a foreign food facility named in the facility's FDA registration. FDA's regulation implementing the food facility requirements requires that the registration for foreign facilities include the name of the U.S. agent for the facility; the U.S. agent acts as a communications link between FDA and the foreign facility for both emergency and routine communications.

In contrast, the U.S. agent or representative of a foreign owner or consignee for FSVP purposes is responsible for meeting the full breadth of applicable requirements under the FSVP regulation. These requirements include conducting a hazard analysis, performing supplier verification activities and taking other steps to ensure the safety of imported food. These responsibilities are qualitatively different from serving as a communications link with a foreign facility. Therefore, a U.S. agent or representative for FSVP purposes serves a different role than a U.S. agent named in the FDA registration of a foreign food facility.

\*Please note that AFI serves as the facility registration agent for hundreds of facilities but does not serve as an FSVP agent.

**Q: What does it mean to have an FSVP for "each food?"**

**A:** You must establish an FSVP for each food you import from each of your foreign suppliers. You do not need to establish a separate FSVP for different versions of the

same food from a single foreign supplier when the differences in the foods do not result in different hazards requiring a control. For example, it might be appropriate for you to develop a single FSVP covering several different packaging sizes or formats for a particular food from a supplier, provided that the packaging differences do not pose different hazards that need to be controlled by the foreign supplier and addressed through different supplier verification activities. Similarly, you might include different flavor varieties of the same food in a single FSVP provided that the hazards and corresponding controls are the same. Examples of "foods" that you might address in a single FSVP (assuming any hazards requiring a control in the different versions of the food are the same) include different varieties of yogurt, cookies, potato chips, chocolate candies, or extruded dog or cat food.

However, if the use of different ingredients to make what is essentially the same food could result in different hazards requiring a control or a need for different types of controls, you should either establish separate FSVPs for these foods or create a single FSVP for the foods that separately addresses the differing hazards or controls required.

Your FSVPs must be specific to each foreign supplier of a food. Thus, if you obtain a food from multiple foreign suppliers, you must have a separate FSVP for each supplier. This is appropriate because the FSVP regulation requires you to consider not just hazards inherent in the food you import but also your foreign suppliers' processes and procedures as well as their compliance and performance history.

**Q: How should I design my FSVP to provide assurances that a human food from a foreign supplier is not misbranded with respect to labeling for the presence of major food allergens?**

**A:** As part of your FSVP, you should review the label of each human food you import to determine that it complies with the labeling requirements for major food allergens. Major food allergen means any of the following: milk, egg, fish (e.g., bass, flounder, or cod), crustacean shellfish (e.g., crab, lobster, or shrimp), tree nuts (e.g., almonds, pecans, or walnuts), wheat, peanut, sesame and soybeans.

**Q: Who must develop and perform activities required for my FSVP?**

**A:** A qualified individual as defined in 21 CFR 1.500 must develop your FSVP and perform each of the activities required under the FSVP regulation.

**Q: Who is a qualified individual?**

A: A qualified individual is a person who has the education, training or experience (or a combination of these) necessary to perform an activity required under the FSVP regulation and can read and understand the language of any records that the person must review in performing this activity.

A qualified individual may be but is not required to be an employee of the importer; you might also rely on non-employees such as a consultant or a third-party auditor. A government employee, including a foreign government employee, may be a qualified individual.

**Q: What is the purpose of the hazard analysis?**

A: The purpose of your hazard analysis is to determine the food safety concerns that might be posed by a food you import into the United States. For each type of food you import, you must conduct a hazard analysis to identify potential food safety hazards that must be managed through controls. You must also assess the probability that the hazard you identify will occur in the absence of controls and assess the severity of the illness or injury to humans or animals from the hazard if the hazard were to occur.

**Q: What basic requirements apply to a hazard analysis?**

A: A hazard analysis must identify and evaluate, based on experience, illness data, scientific reports and other information, the known or reasonably foreseeable hazards in each food you import to determine whether there are any hazards that require measures to control the hazard (e.g., a heat step that is lethal to a pathogen; sorting to remove physical hazards). A hazard analysis must be written, even if you determine that there are no hazards that require a control. A qualified individual must conduct the hazard analysis.

**Q: What types of hazards should I consider in the hazard analysis?**

A: Your hazard analysis must consider known or reasonably foreseeable hazards in each food you import. Such hazards include:

- Biological hazards, including microbiological hazards such as parasites, viruses, environmental pathogens and other pathogens;
- Chemical hazards, including radiological hazards, pesticide and drug residues, natural toxins, decomposition, unapproved food or color additives, food allergens and, in animal food, nutrient deficiencies or toxicities; and

- Physical hazards, including stones, glass and metal fragments.

**Q: May I rely on a hazard analysis conducted by another entity?**

A: Yes. You may rely on a hazard analysis conducted by another entity provided it was conducted by a qualified individual. Your foreign supplier who has conducted a hazard analysis under the preventive controls regulation is likely to be a good source for a hazard analysis for the food you import from them. Alternatively, you might rely on a hazard analysis of a food conducted by another entity, such as a consolidator of a RAC. If you rely on a hazard analysis conducted by another entity, you must review and assess that hazard analysis and document your review and assessment, including documenting that the hazard analysis was conducted by a qualified individual.

**Q: How must I approve a foreign supplier?**

A: You must approve a foreign supplier on the basis of your evaluation of the hazards in the food and the foreign supplier's performance, including its food safety procedures, processes and practices, its record of compliance with FDA food safety regulations and its food safety history. Before approving a foreign supplier, you should have reasonable assurance, based on your consideration of the supplier's performance, that the supplier is controlling the hazards in the food you import or verifying that the hazards have been controlled by its ingredient suppliers. You must document your approval of each foreign supplier. You could do so by maintaining a paper list of approved suppliers or an electronic system that can generate a list of approved suppliers as needed.

**Q: What foreign supplier verification activities may be appropriate?**

A: Depending on the evaluation of the food and foreign supplier, you may conduct foreign supplier verification activities from among the following:

- Onsite audits;
- Sampling and testing of a food;
- Review of the foreign supplier's relevant food safety records; and
- Other appropriate supplier verification activities.

**Q: Should I conduct more than one supplier verification activity for a particular food from a particular foreign supplier?**

A: In some cases, you may determine that more than one supplier verification activity is warranted for a particular food from a particular foreign supplier. For example, when the identified hazard requiring a control in a food is a pesticide that is not a SAHCODHA hazard, you may determine that the appropriate foreign supplier verification activities are to review the foreign supplier's food safety plan and to sample and test some of the shipments you import for pesticides. \*Note: Many importers were using more than one verification step prior to FSVP and continue to do so.

**Q: What foreign supplier verification activities must I conduct?**

A: Based on the determination you made (or reviewed and assessed), you must conduct (and document) or obtain documentation of one or more supplier verification activities (onsite auditing, sampling and testing, review of foreign supplier food safety records or some other mechanism determined to be appropriate) for each foreign supplier before importing the food and periodically thereafter.

**Q: What documentation of sampling and testing must I have?**

A: You must retain documentation of each sampling and testing of the food. Your documentation must include:

- Identification of the food tested (including lot number, as appropriate),
- The number of samples tested,
- The test(s) conducted, including the analytical method(s) used,
- The date(s) on which the test(s) were conducted,
- The date of the report of the testing,
- Results of the testing,
- Corrective actions taken in response to detection of hazards,
- Information identifying the laboratory that conducted the testing (e.g., name and address), and
- Documentation that the testing was conducted by a qualified individual. If any of this information is included in the laboratory report or COA you receive from the laboratory that performs the test, you may use the report or certificate as documentation of that information (i.e., you need not create a duplicate record of the information on the laboratory report).



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**Q: What are the general requirements for maintaining FSVP records?**

**A:** You must keep records as original records, true copies (such as scanned copies,) or electronic records to support your FSVP for each food from a particular foreign supplier. You must sign and date your FSVP records upon initial completion and upon any modification. For example, when you complete a hazard analysis, you must sign and date the analysis. If you modify the hazard analysis based on a reevaluation, you must sign and date the modified hazard analysis. Additional examples of FSVP records that must be signed and dated upon initial completion and any modification are records documenting the approval of foreign suppliers, determination of appropriate foreign supplier verification activities and performance of supplier verification activities.

**Q: How long must I retain my FSVP records?**

**A:** You must retain required FSVP records for at least 2 years after you created or obtained the records (with certain exceptions discussed below). For example, if you take a corrective action after determining that a food you import was adulterated (e.g., you work with the foreign supplier to ensure that the problem is corrected before you again offer the food for importation into the United States), you must retain documentation of the corrective action you took for at least 2 years. You must retain records relating to your FSVP processes and procedures, including the results of evaluations and determinations you conduct, for at least 2 years after you discontinue using the process or procedure.

We would consider a process or procedure discontinued if, among other things, you no longer import a particular food, you no longer obtain food from a particular foreign supplier, you reevaluated the foreign supplier's performance and the risks associated with a food, or you changed your supplier verification activities for a particular food and supplier. For example:

- If you rely on the results of a particular onsite audit of your foreign supplier for 2 years, you must retain documentation of the audit results for at least 2 years after you no longer rely on those results in meeting your verification activity requirements (i.e., 4 years after you started to rely on the results of the onsite audit).

- If you import produce, but stop importing all tomatoes, you must retain your FSVP records relating to tomatoes for 2 years after you stop importing them. If you change your foreign supplier of tomatoes from Farm X to Farm Y, you must retain your records specific to Farm X for 2 years after you stop using Farm X as your supplier.

- If you become aware of new information about your supplier that causes you to reevaluate the risk posed by a food and the foreign supplier's performance, you must retain the previous food and supplier evaluation for 2 years after you perform the reevaluation.

- If your reevaluation of foreign supplier performance causes you to change your supplier verification activities from annually reviewing the supplier's food safety records to annually conducting an onsite audit of the supplier, you must retain records of your previous determination of appropriate supplier verification activities (i.e., review of your supplier's food safety records) for 2 years after you determined that a different supplier verification activity (i.e., annual onsite audit) is appropriate.

**Q: How will FDA determine if I am in compliance with the FSVP requirements?**

**A:** FDA may review your FSVP records to evaluate your compliance with the FSVP requirements. This review might be at your place of business or remotely, through an official written request to send records relating to your FSVP activities to the agency. We will review required FSVP records relating to one or more of the foods you import, including the following records, when applicable:

- Hazard analysis;
- Evaluation and reevaluation of risk posed by a food and the foreign supplier's performance;
- Procedures to ensure that you import foods only from approved foreign suppliers;
- Procedures for using unapproved foreign suppliers on temporary basis, when applicable;
- Procedures to ensure appropriate verification activities are conducted
- Adequate review of foreign supplier verification activities;

- Corrective actions taken, as appropriate;
- Documentation of eligibility as a very small importer or whether a foreign supplier is "small" and
- Reevaluation of the FSVP either for cause or at least every 3 years

**Q: Will every violation of the FSVP regulation warrant an enforcement action by FDA?**

**A:** No. FDA will employ a risk-based enforcement strategy focusing on violations that pose a risk to public health. We will consider your overall compliance with the FSVP regulation and any corrective actions you have taken or plan to take in determining whether a violation of FSVP requirements warrants FDA taking enforcement action.

**Q: How will FDA inform me if I am not in compliance with the FSVP requirements when FDA reviews my records?**

**A:** If the FDA investigator observes potential violations of the FSVP requirements during a review of your records, the investigator will provide you with a written summary of the observations on an FDA Form 483a ("FSVP Observations"). FDA may also discuss the observations with you. In a discussion of the observations, you may inform the investigator or other agency personnel of corrections you have made or that you plan to make. We will take any corrective actions into account when determining whether to take enforcement action (e.g., warning letter or FDA import alert).







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# ESOPs:

# Selling an F&B Company in a High-Interest Environment

PATRICE RADOGNA, CPA

In the current high interest rate environment, the flow of merger and acquisition transactions is slowing as lenders tighten their underwriting standards across industries. Uncertainty about the health of the economy has further slowed traditional deal-making activity in the food and beverage sector, among others. As a result, intrepid advisors are exploring structures that better meet the needs of both shareholders (sellers) and acquirers. One increasingly popular option in this environment – with uniquely advantageous tax and remittance features – is the Employee Stock Ownership Plan transaction.

The following aspects of ESOP deals may make them a fitting option for owners of F&B companies seeking an advantageous strategy in the current high interest environment.

**Flexibility:** A company-sponsored ESOP is an alternative buyer (partial or full) that can purchase a selling shareholder's business, with the transaction able to be co-financed by both a bank and the seller. An ESOP structured this way can enable the seller to collect interest income and allow the company, at its discretion, to accelerate repayment (before maturity) without a pre-payment penalty. Since seller-financed debt is viewed as "friendly debt," ESOPs can also offer a company flexibility in its repayment terms in the event of economic stress.

**Tax efficiency:** Capital gains taxes are part and parcel of traditional M&A transactions, but can be (and often are) deferred in ESOP transactions when selling shareholders elect to make a 1042 rollover with a portion of the proceeds. In addition, among other post-transaction tax advantages, companies have the possibility of becoming a tax-free entity after an ESOP deal closes.

**Management retention:** In an ESOP sale, employees can be awarded stock appreciation rights in addition to retirement plan benefits. These can be powerful incentives to motivate key employees to stay with the company and contribute further to its growth. In the wake of the "Great Resignation," ESOPs are a compelling option for those concerned with post-transaction turnover.

## Notable ESOPs in the F&B Sector

**King Arthur Flour**

**Harpoon Brewery**

**WaWa convenience stores**

One of largest ESOPs/privately held companies in the U.S. (\$11 billion revenue)

**WinnCo**

**Supermarkets**

**Cliff Bar**

Became an ESOP and then sold for several \$ billion in 2022, creating significant wealth for the employees

**Lower turn-over:** A post-COVID survey by the National Center for Employee Ownership (NCEO) demonstrates the efficacy of F&B industry ESOPs in supporting employee retention, benefits and improved performance as compared to non-ESOP companies. The survey reveals that F&B companies that executed ESOPs experienced turnover rates of less than half of their non-ESOP counterparts during 2020.

### ESOPs Under Current Market Conditions

There are fewer lending dollars available currently and traditional debt financing is less able to provide the liquidity companies need in today's high interest rate environment. A Bloomberg article from late 2022 highlights the role of creativity in getting deals done. Specifically, the article identified an increase in equity financing, agreements that take the leverage out of leveraged buyouts and the potential for spinoff deals to bring value in a struggling market. Ingenuity could continue to prove instrumental in successful dealmaking through 2023.

For F&B companies — particularly those with low debt, strong balance sheets, consistent earnings and strong management teams — the costs associated with debt financing and concerns about bank-financed leveraged buyouts could make ESOPs, financed with seller notes, an appealing exit

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opportunity. As borrowing costs increase, sellers are recognizing the opportunity to take on the role of the bank for part or all of the transaction sale price.

The ESOP as an exit option continues to garner attention as a solution for business owners to sell their companies and receive liquidity in exchange for ownership interests.

### ESOP Advantages

Promoted by Congress in 1974 as part of the Employment Retirement Income Security Act, ESOPs were designed to boost the economic power of employees by enabling the tax-advantaged sale of a business from shareholders to its workforce. In a high interest rate environment, ESOPs may have a few advantages when compared to traditional merger and acquisition deals, including:

- (i) Lower borrowing costs;
- (ii) Flexibility in deal structure (i.e., a combination of external loan and seller notes); and
- (iii) Income tax benefits.

A trust, set up for the ESOP, purchases and holds the company's stock for the benefit of the company's employees. The selling shareholder thereby gains

liquidity from a "ready market," i.e., the trust. Any funding required can be secured through bank financing, seller financing, company cash or a combination of these.

Significantly, the company that undertakes an ESOP is often able to retain the corporate culture and management talent that contributed to its success over the years. In this way, ESOPs can help preserve morale and leadership structures that may be lost in other types of transactions.

### Seller Notes

A key mechanism in ESOP transactions is the common use of seller notes as a form of debt financing structured as an interest-bearing loan. Seller notes enable the selling shareholder to earn a strong level of interest income and receive warrants to increase overall return, while the company benefits from lower risk than would be inherent in a secured loan from a bank. The tradeoff is that the selling shareholder does assume some risk and needs patience in the timing of repayment.

### Advantages:

- The use of payment-in-kind interest or warrants (equity participation rights), which can yield a higher return on investment as compared to the ROI generated by outside financing.
- Flexibility with respect to seller note payments as a form of company-friendly debt, including temporary deferral.
- The ability to accelerate payments without penalties.

### Potential risks:

- Seller notes are usually unsecured. In the event of a default, collateral is unlikely to cover the debt.
- Seller notes carry the risk that they may not be repaid if the company's financial performance suffers.
- Seller notes are subordinated to any senior debt.
- Seller notes do not provide liquidity as quickly as bank financing.

ESOPs have proven to be an attractive alternative exit strategy for owners of companies that meet certain criteria, especially when seeking an option that is tax efficient, rewards and incentivizes employees, and preserves the culture and legacy of the company. This can certainly hold true for shareholders of F&B companies on solid financial footing. As part of a thorough analysis of various exit strategies, careful consideration of the pros and cons of an ESOP transaction may reveal the optimal path for yourself and the team that will take your legacy forward.



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# NEARSHORING:

## The Opportunity to Reduce Risk, Cost in Your Global Supply Chain

THOMAS A. COOK

**N**earshoring can be defined as follows: the practice of transferring a business operation to a nearby country, especially in preference to a more-distant one.

Nearshoring is a process that's been more seriously considered by procurement and supply chain managers in the past five years and it's anticipated by most professional sourcing executives to become a major factor in future years, implemented by most companies as a critical risk management tool.

Throughout modern business history – dating from the 1980s - leveraging spend in procurement consisted of four primary practices:

1. Overseas sourcing, particularly in China
2. Focusing on a few key suppliers
3. Lowering acquisition costs
4. Rough negotiations with carriers and service providers in the quest to lower freight costs

The Covid-19 pandemic we faced in the last two and a half years, with residual impact heading into 2023, has upended these long-held strategies, teaching us profound lessons in understanding the challenges in foreign sourcing and less diversification in our supplier base.

In the period of unprecedented constraints brought about by the pandemic, the consequence of the prior strategies was a major uptick in supply chain risk and costs. Risks manifested themselves in delays, unavailability of certain materials, parts and finished products, increased costs and significant uncertainties in our demand planning models.

Procurement and supply chain managers over the last 2 ½ years have had many great challenges which have taught them valuable lessons, leading to new strategies for 2023 and beyond.

### Leading the new strategies are:

1. Diversifying the vendor/supplier base both by company and country of origin
2. Increasing the number of supplier/vendor options
3. Viewing “nearshoring” options
4. Seeking cost reductions in overall “landed costs” - not just acquisition and freight costs

Global companies impacted negatively by the pandemic, across all verticals including food import businesses, have begun to seriously explore options in all four areas outlined above.

Managing “landed costs” is a much-needed component of the nearshoring decision. Outlined below are the key areas of landed cost assessment:



The dissection and assessment of “landed cost” is taking each of these areas and modeling how nearshoring can provide benefit.

Acquisition cost is defined as what we pay for goods acquired, usually expressed as the FOB Price (Freight on Board/INCO Term). This brings the goods in the origin country to the port of export. It's the price we pay plus the cost of freight from origin to the outbound gateway.

As a general rule, the acquisition cost of nearshoring is likely to be higher. But the other four areas of consideration could be much lower, mitigating the impact of the higher acquisition cost.

Manufacturing brought back to the Canada and the United States is happening, but slowly. Labor shortages are a major factor here, along with environmental and HR concerns.

However, bringing manufacturing to a country such as Mexico and working in the local Maquiladora program, could potentially have a huge advantage in all five areas that make up landed costs.

In many instances, the acquisition cost is the same or a small amount higher. But the freight costs are much lower, customs clearance is easier and less costly, import duties and taxes are significantly reduced or eliminated and the cost of distribution, depending upon location may be the same or a little less.

The benefits outlined above demonstrate the ROI in

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## CHINA VERSUS MEXICO LANDED COST COMPARISON (FTA): A CASE STUDY

PRIMARY AREA(S) OF REVIEW	CHINA	MEXICO	COMPARISON
Acquisition Cost	\$25.00 unit/ 10,000 units	\$25.00 unit/ 10,000 units	\$250,000 same
Export Charges	\$0.50	\$0.10	\$5,000 vs \$1,000
Freight (40' unit)	\$2,000	\$700.00	\$2,000 vs \$700
Duty & Taxes	5.50%	0	\$14,025 vs 0
Customs Clearance	\$100.00	\$65.00	\$100 vs \$65
<b>ESTIMATED TOTAL TRANSACTIONAL</b>	<b>\$271,125</b>	<b>\$251,765</b>	<b>\$19,360</b>

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a simple comparison in coordinating manufacturing in Mexico as compared to China.

To this simple overview, other challenges must of course be considered: the nature of the product, quality control, production capability, etc. But the case study clearly demonstrates that when “landed cost” modeling is used it affords nearshoring to be a viable option.

In a “best practice” scenario, we believe that overseas manufacturing has value in reducing cost but we must also consider the risk that’s compounded when all our manufacturing is dependent on one country, a few suppliers and thousands of miles away where economic, political, climate and environmental concerns abound.

A preferred practice would be to not be wholly dependent upon foreign suppliers, such as in China, and diversify our supplier management by bringing a certain percentage closer to home, mitigating both risk and cost.

Nearshoring should be a serious consideration for any supply chain or procurement manager for the following reasons:

- It reduces the risk associated with foreign purchasing in single-source countries, such as but not limited to China.
- When “landed cost” comes into the assessment process, it may also provide an avenue for cost reduction.
- It diversifies the supplier/vendor base which, in the long run, is a sound risk management strategy.

### Foreign Trade Zones

For companies in Canada and the United States that want to consider bringing manufacturing back to their country and obtain some leverage in doing so should explore specially designed programs: Foreign Trade Zones in the U.S. and in Duty-free Manufacturing Tariff Regime in Canada.

These programs basically allow imports of

raw materials and components duty free into specially designated manufacturing sites.

Duty deferral is a big advantage, with duty coming due only once the finished product comes out (is sold). Furthermore, duty may be considerably less, depending upon if a favorable tariff shift has occurred.

The FTZ Program in the U.S. is determined by individual locations, authorized by “grantees” under the International Trade Administration’s regulations.

The Tariff Manufacturing Program in Canada has no geographic restrictions, opening the entire country to access the benefits of duty-free manufacturing.

Both programs, nearsourcing and FTZ, create a pathway for reducing both risk and cost to imported products. In turn, if some or all imported products are exported, additional financial benefits and incentives may also exist.

### Friendshoring

In our discussion of nearshoring we need to briefly discuss the notion of “friendshoring”, which has been described as a portmanteau buzzword for the business strategy of running supply chains only through countries that are close political partners.

Past and current trade disruptions caused by political events have caused this phenomenon to move forward, since allied countries are more aligned to keep supply chain open and working to the mutual best interests of the countries involved.

As examples, countries that might fit into this profile as countries to source from or trade with: Mexico, South Korea, Vietnam, Malaysia, Indonesia, Japan and Brazil.

The U.S. has various forms of trade agreements with all the countries named above and, in some cases, it affords more competitive trade, such as through duty mitigation, relaxation of barriers and trade facilitation mechanisms in place – thus significantly reducing the impact of any challenges.

Any company seeking to bring risk management into their global supply chain procurement strategies would be well served by considering these “friendly markets” as viable options.

### Summary

The article ultimately points out the need for procurement and supply chain managers to deeply assess all the parts that make up their supply chain, with full anticipation of finding areas where risk and cost can be reduced.

Of the many ideas discussed in this article, at least one or two should provide benefit to your organization’s global supply chain business model. It’s certainly worth the time to take a good look.

### About the Author

Thomas Cook is Managing Director of Blue Tiger International (bluetigerintl.com), a premier international business consulting company on supply chain management, trade compliance, purchasing, trade and disruption management, global business and logistics. Tom was former CEO of American River International in NY and Apex Global Logistics Supply Chain Operation in LA. Tom has over 35 years’ experience in assisting companies all over the world manage their import and export operations. He is a member of the NY District Export Council, sits on the board of numerous corporations and is considered a leader in the business verticals he supports. Tom is also the Director of the National Institute of World Trade (niwt.org) a 30-year-old educational and training organization, based in NY. Both Blue Tiger International and the National Institute of World Trade are strategic partners of the Department of Commerce.

Tom has authored over 20 books on global trade and is finalizing a nine-book series titled “The Global Warrior ... Advancing on the Necessary Skill Sets to Compete Effectively in Global Trade.”



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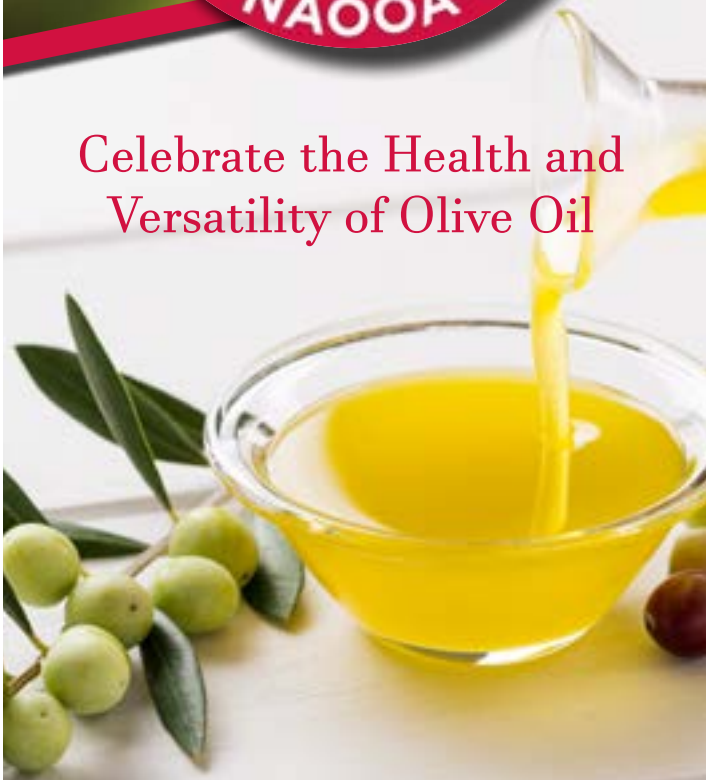
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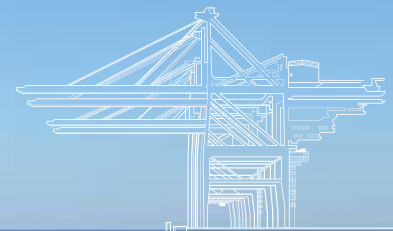


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Website: www.tamefield.com  
Email: maryann@yorktrans-worldwide.com  
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Cankaya Izmir 35210  
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Website: www.tarisincir.com.tr  
Email: bustay@tarisincir.com.tr  
Behcet Ustay, Foreign Trade Vice Manager

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Temel Gida Ve Toprak Urunleri San Ve Dis Tic. Ltd. Sti.  
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Phone: 00902363775404  
Fax: 00902363775094  
Website: www.temelgida.com.tr  
Email: secil.yesilderya@pagysa.com  
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Phone: 0084-6503796320  
Fax: 0084-6503796320  
Website: www.thanhthom.com  
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Fax: [34] 93-364-2493  
Email: fcruz@thegbfoods.com  
Francisco Cruz

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Marchand 8873  
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Fax: [27] 544410014  
Website: www.the-raisin-company.com  
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Ricardo Picard

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# AFI Food Products Directory

Only company names are listed. Company Representatives, addresses, telephone, fax and email addresses are located in the Membership Directories beginning on Page 32. For quick reference, first check the Index to Advertisers at the back of the book.

## North American Olive Oil Association

Importers & Packers of Olive Oil

## National Honey Packers & Dealers Association

Honey & Honey Products

## Nut & Agricultural Products Section

Nuts, Dried Fruit, Edible Seeds, Botanicals

## Processed Foods Section

Canned & Frozen Foods, Concentrates, Ingredients

## American Associate Members

Companies providing services to AFI; Banks, Laboratories, Insurance Companies, Surveyors, etc.

## Foreign Suppliers

Exporters of All Food Products, Associations

## CODES

<b>B</b>	<b>Briner</b>
<b>D</b>	<b>Distributor</b>
<b>DFB</b>	<b>Domestic Food Broker</b>
<b>E</b>	<b>Exporter</b>
<b>I</b>	<b>Importer</b>
<b>IA</b>	<b>Import Agent</b>
<b>L</b>	<b>Laboratory</b>
<b>M</b>	<b>Manufacturer</b>
<b>P</b>	<b>Packer</b>
<b>S</b>	<b>Supplier</b>

## BAKED GOODS

Agriniotiko SA - E  
Balconi SPA Industria Dolciaria - E  
Bessone SA - E  
Biscottificio Primavera S.r.l. - E  
Bonomi S.P.A. - E  
Cento Fine Foods, Inc. - I, D  
Coins Foods and Spices (Pvt.) Ltd. - E  
D. Coluccio & Sons, Inc. - I, D  
Gourmet Brands Pty Ltd - E  
Grissinificio Zingonia SRL - E  
Jacobsens Bakery Ltd. - E  
Kavli International AS - E  
Loumidis Foods, Inc. - I  
North Trading, Lda. - E  
Profanter Backstube GmbH - E  
Roodenrijs Kaastabletten Industrie "ROKA" B.V. - E  
Ryvita Co. Ltd. - E  
Vieira de Castro Prod. Alim., S.A. - E  
Vigo Importing Company - I, P  
Vitavigor srl - E  
World Finer Foods, Inc. - I, E, M

## BOTANICALS/CRUDE DRUGS

BMT Commodity Corp. - I  
Finck-Jones-Libby Co., Inc. - IA

## BRINED FRUIT

Borges USA / Star Fine Foods, Inc. - M  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Reliable Mercantile Co., Inc. - IA  
World Finer Foods, Inc. - I, E, M

## CANDIED FRUITS

Bazzini Co., Inc., A.L. - S  
Bedemco Inc. - IA  
JFE Shoji Trade America, Inc. - I, E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Sahadi Fine Foods - I, M  
Setton International Foods, Inc. - I

## CANDY

D. Coluccio & Sons, Inc. - I, D  
Musco Food Corp. - I  
Nutrepa, S.A. - E  
Sucs. Lorenzo Estepa Aguilar - E  
Vieira de Castro Prod. Alim., S.A. - E

## CANNED FRUITS

ALMME - Association of Agricultural Cooperatives - E  
Alexander Ltd. - E  
Alcurnia Alimentacion, S.L. - E  
Angel Camacho, S.A. - E  
Arlavan S.A. - E  
Atalanta Corporation - I, IA

Bedemco Inc. - IA  
BMT Commodity Corp. - I CV  
Keong Mas Permai - E  
Camerican International - I, IA, DFB  
CONEX S.A. - E  
Conservas de Murcia, S.L. - E  
Conservas del Valle S.A. - E  
Conservas y Frutas, S.A. - E  
Costa de Oro Internacional - E  
Fairteck Holding PTE Ltd. - E  
Fenix S.A. - E  
Filiberto Martinez, S.A. - E  
Golden Beach, Inc. - I  
Goya Foods, Inc. - I, M  
Great Lakes International Trading, Inc. - I, E  
Hop Chong Trading Co., Inc. - I  
Inaexpo USA Ltd. - I  
Industrias Alimenticias Mendocinas S.A. - E  
Inter-Iberia Comercio de Alimentos, Ltda. - E  
Intercomm Foods, S.A. - M  
J.A. Kirsch Corp. - I  
J.M.B. International, Ltd. - E  
Jorday Foods International - IA  
Kronos S.A. - E  
Kuiburi Fruit Canning Co., Ltd. - E  
Luisky (Shaanxi) Food Co., Ltd. - E  
Manuel Garcia Campoy S.L. - E  
Marin Gimenez Hnos., S.A. - E

Marin Montejano, S.A. - E  
Mateo Hidalgo, S.A. - E  
Materne - Conflux S.A. - E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Merwanjee Poonjiajee & Sons Pvt. Ltd. - E  
McLane Global - I  
National Cortina Corp. - I  
Odenwald Fruechte GmbH - E  
Ongkorn Special Foods Co., Ltd - E  
P. Pavlides S.A. - E  
Pedro Guillen Gomariz, S.L. - E  
Port Royal Sales - I  
Pranburi Hotel Co. Ltd. - M, E  
Productos Bionaturales Calasparra S.A. - E  
PT. Inni Pioneer Food Industry - E  
Rema Foods, Inc. - I  
Sanmenxia Luck Fruit Industry Co., Ltd. - E  
Schreiber Foods International, Inc. - I  
Schlafani Corp., Gus - I  
Simco Sales - I  
Sinco, Inc. - I  
SMP Foods Products Co., Ltd. - E  
Soprimes, S.A. - I, E  
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Vegetexco Ho Chi Minh City - E  
Victoria Pacific Trading Corp. - I  
Weishan Ciway Food Co. Ltd. - E  
World Finer Foods, Inc. - I, E, M

## CANNED MEATS

Atalanta Corporation - I, IA  
Camerican International - I, IA, DFB  
Export Packers - E  
Goya Foods, Inc. - I, M  
JFE Shoji Trade America, Inc. - I, E  
McLane Global - I  
Musco Food Corp. - I  
Pastene Companies, Ltd., The - I  
Rema Foods, Inc. - I

## CANNED SEAFOOD

Acme Food Sales, Inc. - I  
Atalanta Corporation - I, IA  
Atlantic Sardine Anchovies Tan  
Tan - E  
BMT Commodity Corp. - I  
Bedemco Inc. - IA  
Bluewave Peru Marine Sac - E  
Borges USA / Star Fine Foods, Inc. - M  
Briosa - Conservas de Pescado  
Lda. - E  
Camerican International - I, DFB, IA  
Cannex, S.A. - E  
Cento Fine Foods, Inc. - I, D  
Chotiawat Manufacturing Co., Ltd. - E  
Cofaco Açores - E  
Coins Foods and Spices (Pvt.) Ltd. - E  
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Conservas Fredo, S.A. - E  
Conservas Portugal Norte, LDA. - E  
Crown Prince, Inc. - I  
Euroalimint P.A.C. S.L. - E  
Export Packers - E  
Fabrica de Conservas da Murtosa  
LDA - E  
Foodtech Co. Ltd. - E  
Foshan Shunde Hai-Ding Aquatic  
Resources  
Foodstuff Co., Ltd. - E  
Frinsa del Noroeste, S.A. - E  
Golden Beach, Inc. - I  
Goya Foods, Inc. - I, M  
Graal S.A. - E  
Highland Dragon Enterprise - E  
Hop Chong Trading Co., Inc. - I  
Industry Moroccan Anchovies - E  
Inter-Iberia Comercio de  
Alimentos, Ltda. - E  
J.A. Kirsch Corp. - I  
J.M.B. International, Ltd. - E  
JCS Tradecom, Inc. - I  
JFE Shoji Trade America, Inc. - I, E  
Jie Yang Rex Foods Co. Ltd. - E  
John Ross Jnr. (Aberdeen) Ltd. - E  
Joao M. Neto Pereira - E  
M.W. Polar Foods - I, D  
MMP International Co. Ltd. - E  
Majestic Seafood Corporation  
Limited - E  
McLane Global - I  
Musco Foods Corp. - I  
Ongkorn Special Foods Co., Ltd - E  
ORBE, S.A. - E  
Orlando Food Corp. - I, IA, DFB  
Pataya Food Industries, Ltd. - E  
Pastene Companies, Ltd., The - I  
Permex Producer & Exporter Corp. - E  
Port Royal Sales - I  
PRANAS S.A. - P  
PT. Avila Prima Intra Makmur - E

PT Deho Canning Co. - E  
PT. Inni Pioneer Food Industry - E  
PT. Juifa International Foods - E  
PT Rex Canning - E  
Pt. Samudra Mandiri Sentosa - E  
PT Sinar Purefoods International - E  
R S Cannery Co., Ltd. - E  
Ramirez & Co (Filhos), S.A. - P, E, I, S  
Rema Foods, Inc. - I  
Royal Food Import Corp. - I  
Schreiber Foods International, Inc. - I  
Sclafani Corp., Gus - I  
Shafer-Haggart, USA - I  
Shinjin Moolsan Co. Ltd. - E  
Silver Food - E  
Simco Sales - I  
Sinco, Inc. - I  
SOPRAL - E  
Soprimex, S.A. - I, E  
Strohmeier & Arpe Co., Inc. - I  
Sulljung Foods Co. Ltd. - E  
Unicord Company Limited - E  
Vigo Importing Company - I, P  
Worldly Delights, Ltd. - IA, DFB  
World Finer Foods, Inc. - I, E, M  
Yurrita & Sons, S.A. - E

## CANNED VEGETABLES

AGARCAM, S.A. - E  
Aceitunas Guadalupe S.A. - E  
Acme Food Sales, Inc. - I  
Agrucapers, S.A. - E  
ALIMINTER, S.A. - E  
Amanida, S.A. - E  
Angel Camacho, S.A. - E  
Arguimbau & Co. - IA, DFB  
Atalanta Corporation - I, IA  
Bedemco Inc. - IA  
Blue Planet Foods - I  
Bonduelle Polska S. A. - E  
Borges USA / Star Fine Foods, Inc. - M  
C. Zafiroopoulos - A.  
Tomaras S.A. - E  
Camerican International - I, IA,  
Caragol Global Sourcing Inc. - IA  
DFB Cento Fine Foods, Inc. - I, D  
Clement Faugier - E  
Conservas de Murcia, S.L. - E  
Conservas del Valle S.A. - E  
Conservas El Raal S.C.L. - E  
Consorcio Peru-Murcia - M  
Costa de Oro Internacional - E  
Euroalimint P.A.C. S.L. - E  
EUROPI S.r.l. - E  
F.J. Sanchez Sucesores, S.A. - E  
Fenix S.A. - E  
Filiberto Martinez, S.A. - E  
Food Match - I  
GSV Cooperative - I  
Golden Beach, Inc. - I  
Golden Foods S.A. - E  
Gonzalez Garcia Hnos. S.L. - E  
Goya Foods, Inc. - I, M  
Guangxi Hengyong Industrial  
Commercial Dev - E  
Guangxi Jisheng Foods Inc. - E  
Inaexpo USA Ltd. - I  
Ingredienttrade, Inc. - I  
Inter-Iberia Comercio de Alimentos,  
Lda - E  
Italfoods, Inc. - I  
J.A. Kirsch Corp. - I  
J.M.B. International, Ltd. - E  
JFE Shoji Trade America, Inc. - I, E  
Jorday Foods International - IA  
Konstantopoulos S.A. - E  
Luisky (Shaanxi) Food Co., Ltd. - E  
Lutece B.V. - E  
M.W. Polar Foods - I, D

Macarico S.A. - E  
Manuel Garcia Campoy S.L. - E  
Manuel Mateo Candel S.L. - E  
Marin Montejano, S.A. - E  
Marocapres - E  
Mateo Hidalgo, S.A. - E  
McLane Global - I Menu SRL - E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Merwanjee Poonjajee & Sons Pvt.  
Ltd. - E  
MJ Rosenmayer - I  
Musco Food Corp. - I  
Nagajati Food Sdn Bhd - E  
National Cortina - I  
Omega Foods - I  
Ongkorn Special Foods Co., Ltd - E  
Orlando Food Corp. - I, IA, DFB  
Pastene Companies Ltd., The - I  
Pedro Guillen Gomariz, S.L. - E  
Port Royal Sales - I  
Prochamp BV - E Productos  
Bionaturales  
Calasparra S.A. - E  
PT. Inni Pioneer Food Industry - E  
RDA S.r.l. - E  
Reliable Mercantile Co., Inc. - I, IA  
Rema Foods, Inc. - I  
Ron-Son Foods, Inc. - P, I  
Royal Food Import Corp. - I  
Safe Food Corporation - I  
Sclta - Champimer BV - E  
Schreiber Foods International, Inc. - I  
Sclafani Corp., Gus - I  
Setton International Foods, Inc. - I  
Shafer-Haggart, USA - I  
Shandong International Service  
Trade Corp. - E  
Simco Sales - I  
Siouras A.S. - E  
Sinco, Inc. - I  
SOPRAL - E  
Strohmeier & Arpe Co., Inc. - I  
Vegetexco Ho Chi Minh City - E  
Victoria Pacific Trading Corp. - I  
Vigo Importing Company - I, P  
Weishan Ciway Food Co. Ltd. - E  
World Finer Foods, Inc. - I, E, M

## CHEESE

Agriform SCA - E  
Atalanta Corporation - I, IA  
Azienda Agricola La Bottera S.S. - E  
Camerican International - I, IA, DFB  
Caseificio Olanda Michele - E  
Cento Fine Foods, Inc. - I, D  
D. Coluccio & Sons, Inc. - I, D  
Cooperativa Agricola IL FORTETO - E  
Goya Foods, Inc. - I, M  
Italformaggi S.R.L. - E  
Italfoods, Inc. - I  
Kavli International AS - E  
Lopez & C Srl - E  
Musco Food Corp. - I  
Orlando Food Corp. - I, IA, DFB  
Pastene Companies, Ltd., The - I  
Roodenrijs Kaastabletten  
Industrie "ROKA" B.V. - E  
Setton International Foods, Inc. - I  
Sclafani Corp., Gus - I  
Societa Agricola La Bruna Di Fiandino  
Da- vide & C. S.S. - E  
Tianshui Cangsheng Food Co., Ltd. - E  
Trucco, Inc., A.J. - I  
UGS Urla Gıda ve Tarım Ürünleri  
San. Tic. Ltd. - E  
Vigo Importing Company - I, P  
World Finer Foods, Inc. - I, E, M

## CHOCOLATE, COCOA PRODUCTS, CAROB

Bazzini Co., Inc., A.L. - M  
Bedemco Inc. - IA  
Braun & Sons, Inc., J.F. - I  
Brauner International Corp - I  
Elizabeth Shaw Ltd. - E  
Goya Foods, Inc. - I, M  
Ludwig Weinrich GmbH & Co. KG - E  
Nutrepa, S.A. - E  
Persnam Corporation - E  
Rema Foods, Inc. - I  
Setton International Foods, Inc. - I  
Trucco, Inc., A.J. - I

## COCONUT

CCC-Creamed Coconut DC-  
Dessicated Coconut CM-Coconut  
Milk  
4Care Co., Ltd. - I, D  
Bazzini Co., Inc., A.L. (DC) - E, I, M  
Braun & Sons, Inc., J.F. - I  
Fairteck Holding PTE Ltd. - E  
Goya Foods, Inc. (CC,CM) - I, M  
Great Lakes International  
Trading, Inc. (DC)  
McLane Global - I  
Red River Foods - I  
Sahadi Fine Foods (DC) - I, M  
Sari Segar Husada, PT (DC) - E  
Schreiber Foods International, Inc. - I  
Setton International Foods, Inc.  
(DC) - I  
Superstar Coconut Products Co.,  
Inc. - E  
Trucco, Inc., A.J. - I  
Unity Food Co., Ltd. - E

## COFFEE, ESPRESSO & TEA

Amazon Trading  
(Pvt.) Ltd. - E Biancaffè - E  
Blair Shipping Services (Pty) Ltd. - E  
Brauner International Corp - I  
D. Coluccio & Sons, Inc. - I, D  
Emilpack Isca SRL - E  
J. Wolff & Company B.V. - E  
McLane Global - I  
Musco Food Corp. - I  
Vegetexco Ho Chi Minh City - E  
Vigo Importing Company - I, P  
VINALIMEX - E

## CONDIMENTS

Angel Camacho, S.A. - E  
Arguimbau & Co. - IA, DFB  
Charbonneaux-Brabant - E  
Delouis SA - E  
Goya Foods, Inc. - I  
Herbarum Veronicæ Srl - E  
Madama Oliva s.r.l. - E  
Menu SRL - E  
Santini Foods, Inc. - M, D  
Sclafani Corp., Gus - I

## DRIED FRUIT

Agrovim S.A. - E  
Andes Quality SA - E  
Arslanturk Tarım Ürünleri Ihracat  
Ithalat A. S. - E  
Atlantix Commodities - I  
BMT Commodity Corp. - I  
Balsu USA, Inc. - I, E  
Bazzini Co., Inc., A.L. - E, I, M  
Bedemco Inc. - IA

Bellafrut S.A. - E  
 Belmar Dis Ticaret AS - E  
 Boyrazoglu Tarim Tic. San. Ltd. Sti. - E  
 Braun & Sons, Inc., J.F. - I  
 Cevdet Aksut ve Ogul. Koll. Sti - E  
 Dalian Jinyu Foods Co., Ltd. - E  
 EBI France Sarl - E  
 Finck-Jones-Libby Co., Inc. - IA  
 Foreign Trade Service Corp. - L  
 Four Seasons Fruits Corporation - E  
 Franco Agency, Inc., The Richard - IA  
 Gigi & Associates Corp. - I  
 Gocmez Tarim Urunleri Ve Gida  
 Sanayi A.S. - E  
 Gold Harbor Commodities - I  
 Great Lakes International  
 Trading, Inc. - I, E  
 GSL Foods Enterprises - E  
 Helmont Srl - E  
 Hopewell International Corp. - E  
 IFS Tarim Urunleri Ltd.Sti. - E  
 International Nut Alliance LLC - I  
 ISIK Organik Gida Tarim  
 Ur.Hayvancilik San. Ve Tic. A.S. - E  
 JCS Tradecom, Inc. - I  
 Jorge E. Gallardo F.S.A.C. - E  
 Kalustyan Corp. - I  
 Kenkko Commodities PLC - E  
 KFC Gida San. A.S. - E  
 Leading Star Trading Company - E  
 MEM Fairway, Inc. - B, S  
 McLane Global - I  
 Mercantum (U.S.) Corp. - I, E, IA, DFB  
 National Cortina - I  
 Oguzcan Tarim Ve Gida Ur.  
 San Tic.A.S. - E  
 Olam Americas, Inc. - I  
 PT. Inni Pioneer Food Industry - E  
 Quality Control Inspections - L  
 Red River Foods - I  
 Reliable Mercantile Co., Inc. - IA  
 Safe Food Corporation - I  
 Sahadi Fine Foods - I, M  
 Setton International Foods, Inc. - I  
 Shandong International Service  
 Trade Corp. - E  
 Shunda Food Company Ltd. - E  
 SMP Foods Products Co., Ltd. - E  
 Star Snacks Company - I  
 Sucs. Lorenzo Estepa Aguilar - E  
 Summit Import Corp. - I  
 Sunrise Commodities - I, E, M  
 Sweet Dried Fruit Inc. - D  
 Tagum Commodities - E  
 Taris Union of Agricultural  
 Coops for Figs - E  
 Tem Ngun Food Corp. - E  
 The Hemisphere Group - I  
 Totally Nuts & More - DFB, I  
 Tropical Synergy International - E  
 Trucco, Inc., A.J. - I  
 Ultra Trading - I  
 Unity Food Co., Ltd. - E  
 Vieira de Castro Prod. Alim., S.A. - E  
 Waymouth Farms, Inc. - P  
 Worldly Delights, Ltd. - IA, DFB  
 Ziba Nut, Inc. - I, E

## DRIED VEGETABLES

BMT Commodity Corp. - I  
 Bedemco Inc. - IA  
 Franco Agency, Inc., The Richard - IA  
 Gold Harbor Commodities - I  
 National Cortina - I  
 Red River Foods, Inc. - I  
 Sclafani Corp., Gus - I  
 Star Snacks Company - I  
 Wuxi Shiner Food Co., Ltd. - E

## DYES - FOOD, DRUG, COSMETIC - INDUSTRIAL

Finck-Jones-Libby Co., Inc. - IA

## EDIBLE SEEDS

Bazzini Co., Inc., A.L. - E, I, M  
 Bedemco Inc. - IA  
 Braun & Sons, Inc., J.F. - I  
 Dalian Jinyu Foods Co., Ltd. - E  
 Finck-Jones-Libby Co., Inc. - IA  
 Franco Agency, Inc., The Richard - IA  
 Gigi & Associates Corp. - I  
 Great Lakes International  
 Trading, Inc. - I, E  
 Interagro Ltd - E Kalustyan Corp. - I  
 Leading Star Trading Company - E  
 Leavitt Corporation, The - I, E, M  
 Mercantum (U.S.) Corp. - I, E, IA, DFB  
 Occidental International Foods, LLC - I  
 Red River Foods, Inc. - I  
 Reliable Mercantile Co., Inc. - I, IA  
 Sahadi Fine Foods - I, M  
 Setton International Foods, Inc. - I  
 Shandong International Service  
 Trade Corp. - E  
 Shunda Food Company Ltd. - E  
 Star Snacks Company - I  
 Sunder Deri Sanayi Gida Turizm Ve  
 Dis Tic. Ltd. Sti. - E  
 The Hemisphere Group - I  
 Totally Nuts & More - DFB, I  
 Trucco, Inc., A.J. - I  
 Ultra Trading - I

## ESCARGOT

Bourgogne Escargots - E

## FROZEN FRUIT

Arguimbau & Co. - IA, DFB  
 Bedemco Inc. - IA  
 Camerican International - I, IA  
 Compañía Frutera La Paz - E  
 Congelados de Tecoman,  
 S.A. de C.V. - E  
 Costa de Oro Internacional - E  
 CROP'S N.A. - E  
 Freezitt - E  
 Fruticola Olmue S.A. - E  
 Fruveco S.A. - E  
 Golden Beach, Inc. - I  
 Goya Foods, Inc. - I, M  
 Grandfond International Ltd. - E  
 Great Lakes International  
 Trading, Inc. - I, E  
 JBH Intertrade LLC - I  
 JFE Shoji Trade America, Inc. - I, E  
 Mondy Polska Sp. z o.o. - E  
 National Cortina - I  
 Sinco, Inc. - I

## FROZEN MEAT

JFE Shoji Trade America, Inc. - I, E  
 Sinco, Inc. - I

## FROZEN SEAFOOD

Acme Food Sales, Inc. - I  
 Atalanta Corporation - I, IA  
 Bangkok Dehydrated Marine  
 Product Co. - E  
 Camerican International - I, IA, DFB  
 Consorcio Industrial El Pacifico  
 SAC - E  
 Goya Foods, Inc. - I, M

Inter-Iberia Comercio de  
 Alimentos, Ltda. - E  
 J.M.B. International, Ltd. - E  
 JFE Shoji Trade America, Inc. - I, E  
 Jie Yang Rex Foods Co. Ltd. - E  
 Kerala Nut Food Co. - S  
 PT Rex Canning - E  
 Pesquera Veraz S.A. - E  
 Shinjin Moolsan Co. Ltd. - E  
 Sinco, Inc. - I

## FROZEN VEGETABLES

Arguimbau & Co. - IA, DFB  
 Bedemco, Inc. Inc. - IA  
 Brighton International Products  
 Corp. - P  
 Camerican International - I, IA, DFB  
 Compañía Frutera La Paz - E  
 Costa de Oro Internacional - E  
 CROP'S N.A., Inc. - E  
 Fruticola Olmue S.A. - E  
 Fruveco S.A. - E  
 Golden Beach, Inc. - I  
 Goya Foods, Inc. - I, M  
 Inter-Iberia Comercio de  
 Alimentos Ltda. - E  
 JFE Shoji Trade America, Inc. - I, E  
 Mondy Polska Sp. z o.o. - E  
 National Cortina - I  
 Rema Foods, Inc. - I  
 Sinco, Inc. - I

## GARLIC

Agrupacpers, S.A. - E  
 Alminter S.A. - M, S  
 Amanida, S.A. - E  
 Bedemco, Inc. - IA  
 F.J. Sanchez Sucesores, S.A. - E  
 Mercantum (U.S.) Corp. - I  
 Shandong International Service  
 Trade Corp. - E  
 Star Snacks Company - I  
 Summit Import Corp. - I  
 Trucco, Inc., A.J. - I

## GIARDINIERA/ PEPPERONCINI

Alminter S.A. - M, S  
 Arguimbau & Co. - IA, DFB  
 Borges USA / Star Fine Foods, Inc. - M  
 C. Zafropoulos - A.  
 Tomaras S.A. - E  
 Cento Fine Foods, Inc. - I, D  
 KFC Gida San. A.S. - E  
 Madama Oliva s.r.l. - E  
 Musco Food Corp. - I  
 Orleans Packing Co. - P  
 Safe Food Corporation - I  
 Sclafani Corp., Gus - D, I  
 Panayiotis N. Kipriotis - E  
 Pastene Companies, Ltd., The - I  
 Vigo Importing Company - I, P  
 World Finer Foods, Inc. - I, E, M  
 Worldly Delights, Ltd. - IA, DFB

## GLACE FRUIT

Arguimbau & Co. - IA, DFB  
 Bazzini Co., Inc., A.L. - E, I, M  
 Bedemco, Inc. - IA  
 Braun & Sons, Inc., J.F. - I  
 Kuiburi Fruit Cup Co. Ltd. - E  
 Sahadi Fine Foods - I, M  
 Trucco, Inc., A.J. - I

## GRAINS

Bedemco, Inc. - IA  
 Cento Fine Foods, Inc. - I, D  
 P.P.H. Elpol Lukasz Łuzniak - E  
 Export Packers - E  
 Kalustyan Corp. - I Polselli S.P.A. - E  
 McLane Global - I  
 Sahadi Fine Foods - I, M  
 Setton International Foods, Inc. - I  
 World Finer Foods, Inc. - I, E, M

## HONEY

Apiario Diamante Comercial  
 Exportadora Ltda - E  
 Apicola Gianoni Seylinco S.A. - E  
 Apimiel GmbH - E  
 Ashurst's American Honey - P, S  
 Bedemco, Inc. - IA  
 Bee Maid Honey - P  
 Bee Products Industry Co. Ltd. - E  
 Bees Brothers, LLC - P  
 Best Food Supplies Corp. - S  
 Bezpeka Medu LLC - E  
 Burleson's Inc. - P  
 Capilano Honey Limited - E  
 Crockett Honey Co., Inc. - M  
 Deer Creek Honey Farms - P, M  
 Dutch Gold Honey - I  
 Esperança Agropecuária e  
 Indústria Ltda. - E  
 Forwind Inc - P  
 Glorybee Foods, Inc. - P  
 Goya Foods, Inc. - I, M  
 Great Lakes International  
 Trading, Inc. - I, E  
 Hive to Table Honey Farms - P  
 Honeymax S.A. - E  
 HoneyTree, Inc. - P  
 Hoyts Honey Farm / Honey Holding - P  
 Impex Group, Inc., The - I  
 Jorge E. Gallardo F.S.A.C. - E  
 Lamex Foods, Inc. - P, I  
 McLane Global - I  
 MIELSO, S.A. - E  
 Miller's Honey Company, Inc. - P  
 Minamel Agroindústria Ltda. - E  
 Natural Honey Importers - I  
 NEXCO S.A. - E  
 Nutrepa, S.A. - E  
 Odem International - E  
 Prairie Imports LLC - I  
 Quality Services International - L  
 Seylinco S.A./Nimelcor S.A. - E  
 Smitty Bee Honey - P  
 Sunland Trading LLC - I  
 Suzanne's Specialties - P  
 Toshoku America, Inc. - I  
 Sweet Holdings LLC - I  
 Tropical Blossom Honey Co., Inc. - P  
 Trucco, Inc., A.J. - I  
 Ukrainian Honey Ltd. - E  
 World Finer Foods, Inc. - I, E, M

## INGREDIENTS

BMT Commodity Corp. - I  
 Bedemco, Inc. - IA  
 Braun & Sons, Inc., J.F. - I  
 Camerican International - I, IA,  
 DFB Gerber Ingredients - E  
 Global Ingredients Sourcing - I  
 SOPRAL - E  
 Soprimex S.A. - E  
 World Finer Foods, Inc. - I, E, M

## JAMS, JELLIES, MARMALADES & PRESERVES

Arguimbau & Co., - IA, DFB  
Atalanta Corporation - I, IA  
Bedemco, Inc. - IA  
Conservas y Frutas, S.A. - E  
Goya Foods, Inc. - I, M  
Intercomm Foods, S.A. - M  
McLane Global - I  
Sanmenxia Luck Fruit Industry Co., Ltd. - E  
Schreiber Foods International, Inc. - I  
UGS Urla Gıda ve Tarım Urunleri San. Tic. Ltd. - E  
World Finer Foods, Inc. - I, E, M

## JUICE CONCENTRATE

Atalanta Corporation - I, IA  
BMT Commodity Corp. - I  
Bedemco Co. - IA  
Brighton International Products Corp. - P  
Camerican International - I, IA, DFB  
Elgin Fruit Juices (Pty) Ltd. - E  
Export Packers - E  
Goya Foods, Inc. - I, M  
Great Lakes International Trading, Inc. - I, E  
Haraka Kitri Endah, PT - E  
Inter-Iberia Comercio de Alimentos, Ltda. - E  
JBH Intertrade LLC - I  
Kuiburi Fruit Canning Co., Ltd. - E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
National Cortina - I  
Pranburi Hotel Co. Ltd. - M, E  
Rema Foods, Inc. - I  
Salix Fruits LLC - IA  
Sinco, Inc. - I  
Vefa Bozacisi A.S. - E

## MARASCHINO CHERRIES

Alminter S.A. - M, S  
Bedemco, Inc. - IA  
Borges USA / Star Fine Foods, Inc. - M  
Espagry Iberica S.L. - E  
Pastene Companies, Ltd., The - I  
Schreiber Foods International, Inc. - I

## OLIVE OIL

AMD Oil Sales LLC - I  
Aceites Borges Pont, S.A. - E  
Aceites del Sur, S.A. - E  
Aceitunas Guadalquivir S.A. - E  
Ace Endico - D  
Acesur De Prado North America - I, E  
Acesur North America, Inc. - I  
Acorsa USA Inc. - I  
Acushla S.A. - E  
Adams Enterprises, LLC - I  
Agrofood Srl - E  
Agropecuaria Riojana Srl - E  
Aldi Inc. US - D  
Alminter S.A. - M, S  
Amore Trade - M, I  
Ana Gıda İhtiyac Mad. San. Tic. A.S. - E  
Agricola i Caixa Agraria SC

Agritalia s.r.l. - E  
Agro Sevilla U.S.A., Inc. - P, M  
Agrovim S.A. - I, E, M  
Angel Camacho, S.A. - E  
Arguimbau & Co. - IA, DFB  
Arrivato Imports - I  
ASSITOL (Italy) - Assn.  
Atalanta Corporation - I, IA  
Atlas Olive Oils USA, Inc. - I  
Balsari Yag Sanayi Ve Tic. Ltd. Sti. - E  
Bedemco, Inc. - IA  
BLM Prod.-und Vertriebsges mbH & Co. KG - E  
Bodega Perales SL - E  
Borges Tunisie - E  
Borges USA / Star Fine Foods, Inc. - I  
Cambriils SCCL - E  
Camerican International - I, IA, DFB  
Castillo De Canena - E  
Catania-Spagna Corp. - M, I  
Cedar's Mediterranean Foods, Inc. - M, D  
Cento Fine Foods, Inc. - I, D  
CH. Giannoulis S.A. - E  
Clever Harvest - S  
Colavita, USA - I  
Columbus Foods Company - P  
Coricelli Pietro SPA - E  
D. Coluccio & Sons, Inc. - I, D  
Del Ponte Srl - E  
Drogheria Alimentari S.p.A. - E  
Eli-Ad - E  
Emblem Olive Oil - I  
Euroalimnt P.A.C. S.L. - E  
F.J. Sanchez Sucesores, S.A. - E  
Filippo Berio Brand, A Div. of SALVO North America Corp. - I, D  
Food Match - I  
Food Specialties Trading LLC - I  
Francexim Sas - E  
Frantoio Oleario Bartolini Emilio SNC - E  
Gallo Worldwide, Lda. - E  
Goya Foods, Inc. - I  
Gruppo Caro S.R.L.  
Henry Lamotte Oils GmbH - IA  
Ikoyenia, LLC - D  
I.M.E.T. SRL - E  
International Bazaar - I  
INTRAMARK SRL - E  
Italfoods, Inc. - I  
J. Ballester Roses, Sucesores, S.A. - E  
JCS Tradecom, Inc. - I, E  
JFE Shoji Trade America, Inc. - I, E  
Joachim Santos Lima - E  
Loumidis Foods, Inc. - I  
Maeva USA - I  
Manfredi Barbera USA, Corp. - D  
McEvoy Ranch - S  
McLane Global - I  
Minerva S.A. Edible Oil Enterprises - E  
Monini North America, Inc. - M  
Musco Food Corp. - I  
NKM Dis Ticaret Ve Gıda San. Ve Tic. A.S. - E  
National Cortina - I  
Office National de L'Huile Export - E  
Oilerie USA, Inc. - D  
Oleificio Coppini Angelo - E  
Oleificio Fabbri SPA - E  
Oleificio R.M. s.p.a - E  
Oleificio Sardelli S.P.A. - E  
Oleo-Moron, S.L. - E  
Olio Piro LLC - M  
Olitalia S.r.l. - E  
Olivias Seleccions, SLU - E  
Olivite Export S.L. - E  
Olyfo - M  
Open Country S.L. - E  
Orlando Food Corp. - I, D

Overseas Food - I  
Ozaltin Tarim Isl. San. Ve Tic A.S. - E  
Oz Olive gıda San.Ve Ticaret A.S. - E  
Pastene Companies, Ltd., The - I  
Pastificio Attilio Mastromauro Pasta Granoro S.r.l - E  
Pietro Coricelli - I  
Pietro Isnardi Alimentari Spa - E  
Pompeian, Inc. - I  
Port Jersey Logistics - IA  
Prime Line Distributors, Inc. - D  
Rema Foods, Inc. - I  
Ron-Son Foods, Inc. - I  
SGS Control Services, Inc. - L  
Salix Fruits LLC - IA  
San Giuliano North America, Inc. - I  
Santini Foods, Inc. - M, D  
Sclafani Corp., Gus - I  
Schiralli SRL - E  
Societe Generale de Surveillance - L  
Sovena Iberica de Aceites, S.A. - E  
Spruce Foods - D  
Stonewall Kitchen LLC - D  
Sunset Olive Oil LLC - M  
Torres y Ribelles S.A. - E  
Trucco, Inc., A.J. - I  
Umbria Ollii S.R.L. - E  
US Foods, Inc. - D  
Verde Yag Besin Maddeleri San. Tic. A.S. - E  
Vigo Importing Company - I, P  
Vincenzo Salvo S.P.A. - E  
World Finer Foods, Inc. - I, E, M  
Yanni's Olive Grove - M  
Zucchi 1810, Inc. - I

## OLIVES

A. Camacho, Inc. - I  
B. Aceitunas de Mesa S.L. - E  
Aceitunas Guadalquivir S.A. - E  
Aceitunas Rumarin S.A. - E  
Aceitunas Sevillanas, S.A. - E  
Acorsa USA Inc. - I  
Agricola i Caixa Agraria SC  
Cambriils SCCL - E  
Agrofood Srl - E  
Agropecuaria Riojana Srl - E  
Arguimbau & Co. - IA, DFB  
Artestilo Art y Regalo S.L. - E  
Agro Sevilla U.S.A., Inc. - P, M  
Agrosparta - P, M  
Agrovim S.A. - E  
Agrucapers, S.A. - E  
ALIMINTER, S.A. - E  
Amanida, S.A. - E  
ASEMESA (Spain) - Assn.  
Barnier Production - E  
Bell-Carter Foods, Inc. - I  
Blue Planet Foods - I  
Borges USA / Star Fine Foods, Inc. - M  
Braun & Sons, Inc., J.F. - I  
Camerican International - I, IA, DFB  
Caragol Global Sourcing Inc. - IA  
Cento Fine Foods, Inc. - I, D  
COPERMA - E  
Dotta Foods LLC - I  
Euroalimnt P.A.C. S.L. - E  
EXOLIVA S.A. - E  
F.J. Sanchez Sucesores, S.A. - E  
Food Match - I  
Gallo Worldwide, Lda. - E  
Georgoudis Co. S.A. - E  
Goya Foods, Inc. - I, M  
IDEAL SA - E  
Industria Aceitunera Marciense, S.A. - E  
Industrias Alimentarias de Navarra S.A. - E

Intercomm Foods, S.A. - M  
Internacional Olivarera, S.A. - E  
Italfoods, Inc. - I  
JCS Tradecom, Inc. - I  
JOLCA, S.A. - E  
Konstantopoulou S.A. - E  
La Bella Di Cerignola S.C.A. - E  
Loumidis Foods, Inc. - I  
Macarico S.A. - E  
Madama Oliva s.r.l. - E  
McLane Global - I  
Minerva S.A. Edible Oil Enterprises - E  
Musco Food Corp. - I  
Oleo-Moron, S.L. - E  
Omega Foods - I  
Panayiotis N. Kipriotis - E  
Pastene Companies, Ltd. - I  
Rema Foods, Inc. - I  
Ron-Son Foods, Inc. - I  
Salix Fruits LLC - IA  
Schreiber Foods International, Inc. - I  
Sclafani Corp., Gus - I  
Sinco, Inc. - I, DM  
Siouras A.S. - E  
Transmed Foods - I  
UGS Urla Gıda ve Tarım Urunleri San. Tic. Ltd. - E  
Uniteks Tekstil Gıda Motorlu Araçlar San. ve Tic. A. . - E  
Vigo Importing Company - I, P  
World Finer Foods, Inc. - I, E, M  
Worldly Delights, Ltd. - IA, DFB

## PASTA

Agritalia S.R.L. - E  
Camerican International - I, IA, DFB  
Cento Fine Foods, Inc. - I, D  
Colavita, USA - I  
COREX S.p.A. - E  
D. Coluccio & Sons, Inc. - I, D  
De Matteis Agroalimentare SPA - E  
Favellato Srl - E  
Golden Beach, Inc. - I  
Grandi Pastai Italiani Spa - E  
Ind. Alimentare Ferraro - E  
McLane Global - I  
Meridionale Alimenti SRL - M  
Musco Food Corp. - I  
Orlando Food Corp. - IA  
Pagani Industrie Alimentari SPA - E  
Pastene Companies, Ltd., The - I  
Pastificio Attilio Mastromauro Pasta Granoro S.r.l - E  
Pastificio Bolognese SRL - E  
Pastificio de Sortis S.r.l. - E  
Port Royal Sales - I  
Rema Foods, Inc. - I  
Ron-Son Foods, Inc. - C, I  
Schreiber Foods International, Inc. - I  
Sclafani Corp., Gus - I  
Sinco, Inc. - I  
Transmed Foods - I  
Vigo Importing Company - I, P  
World Finer Foods, Inc. - I, E, M

## PEANUTS

Bazzini Co., Inc., A.L. - E, I, M  
Bedemco, Inc. - IA  
Leavitt Corporation, The - I, M, E  
McLane Global - I  
Red River Foods, Inc. - I  
Setton International Foods, Inc. - I  
Totally Nuts & More - DFB, I  
Trucco, Inc., A.J. - I



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## PEAS, BEANS & LENTILS

BMT Commodity Corp. - I  
Bedemco, Inc. - IA  
Boyrazoglu Tarim Tic. San. Ltd. Sti. - E  
Camerican International - I, IA, DFB  
Finck-Jones-Libby Co., Inc. - IA  
Franco Agency, Inc., The Richard - IA  
Goya Foods, Inc. - I, M  
Great Lakes International Trading, Inc. - I, E  
Jorge E. Gallardo F.S.A.C. - E  
Kalustyan Corp. - I  
McLane Global - I  
Mercantum (U.S.) Corp - I, IA, DFB, E  
Meridionale Alimenti SRL - M  
Pastene Companies, Ltd., The - I  
R. Muelle S.A. - E  
Red River Foods, Inc. - I  
Reliable Mercantile Co., Inc. - IA  
Sahadi Fine Foods - I, M  
Sclafani Corp., Gus - I  
Setton International Foods, Inc. - I  
Trucco, A.J. - I  
Vestkorn Milling AS - E  
World Finer Foods, Inc. - I, E, M  
Ziba Nut, Inc. - E, I

## PET SUPPLIES

MMP International Co. Ltd. - E

## PREPARED FOODS

(Cereals, Mixes, Pizza, Sauces, Soups, Ready-to-eat meals)  
ALIMINTER, S.A. - E  
Arisi Giacomo & Figli, s.r.l. - E  
bio-familia AG - E  
Buildmore Enterprise Co., Ltd. - E  
Euroaliment P.A.C. S.L. - E  
Goya Foods, Inc. - I  
Macarico S.A. - E  
MAFIN SPA - E  
Materne - Conflux S.A. - E  
McLane Global - I  
Menu SRL - E  
Preparados Alimenticios S.A. - E  
RDA S.r.l. - E  
SAOR Srl - E  
Vigo Importing Company - I, P  
World Finer Foods, Inc. - I, E, M

## PRODUCE

Camerican International - I, IA, DFB  
Trucco, Inc., A.J. - I

## RICE & GRAINS

Agritalia s.r.l. - E  
Alinsesa - E  
Ascot Commodities S.A. - E  
Bedemco, Inc. - IA  
Cento Fine Foods, Inc. - I, D  
Euroaliment P.A.C. S.L. - E  
Gold Harbor Commodities - I  
Goya Foods, Inc. - I, M  
JFE Shoji Trade America, Inc. - I, E  
Kalustyan Corp. - I  
M/S. Al-Riaz Rice Mills - E  
McLane Global - I  
Ongkorn Special Foods Co., Ltd - E

Riseria Vignola Giovanni SPA - E  
Sclafani Corp., Gus - I  
Simco Sales - I  
Tuska S.A.C - E  
Vigo Importing Company - I, P  
World Finer Foods, Inc. - I, E, M

## SNACKS

Balconi SPA Industria Dolciaria - E  
Biscuterie Jules Destrooper - E  
Coins Foods and Spices (Pvt.) Ltd. - E  
Leading Star Trading Company - E  
Madama Oliva s.r.l. - E  
Materne - Conflux S.A. - E  
McLane Global - I  
Ryvita Co. Ltd. - E

## SPICES

Agritradex Commodities (India) Pvt. Ltd. (2) - E  
Alminter S.A. - M, S  
Badia Spices - I  
Bedemco, Inc. - IA  
Belmar Dis Ticaret AS - E  
Camerican International - I, IA, DFB  
Coins Foods and Spices (Pvt.) Ltd. - E  
Condimentos Dona Tonita SL - E  
Conservas de Murcia, S.L. - E  
Drogheria Alimentari S.p.a. - E  
Euroaliment P.A.C. S.L. - E  
Global Ingredients Sourcing - I  
Goya Foods, Inc. - I, M  
Great Lakes Int'l Trading, Inc. - I, E  
Herbs N Spices International - E  
Jorge E. Gallardo F.S.A.C. - E  
Kalustyan Corp. - I  
Leading Star Trading Company - E  
Madama Oliva s.r.l. - E  
McLane Global - I  
Menu SRL - E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Merwanjee Poonjiajee & Sons Pvt. Ltd. - E  
Millar Importação E Exportação - E  
Morris J. Golombek, Inc. - I  
Occidental International Foods, LLC - I  
Pt Matahari Food Ingredients - E  
Red River Foods, Inc. - I  
Reliable Mercantile Co., Inc. - I  
SIDI Marketing 90 - E  
SLD Commodities, Inc. - IA  
Sabirlar Findik Ihracat Ltd. - S, E  
Schreiber Foods International, Inc. - I  
Second House Products - E  
Setton International Foods, Inc. - I  
Shandong Int'l Service Trade Corp. - E  
Star Snacks Company - I  
Sunder Deri Sanayi Gida Turizm Ve Dis Tic. Ltd. Sti. - E  
Trucco, Inc., A.J. - I  
UB Global Corporation - E  
Unity Food Co., Ltd. - E  
Vegetexo Ho Chi Minh City - E  
Vigo Importing Company - I, P  
Worldly Delights, Ltd. - IA, DFB

## SYRUP

Alminter S.A. - M, S  
Bedemco, Inc. - IA  
Intercomm Foods, S.A. - M  
Santini Foods, Inc. - M, D  
World Finer Foods - I, E, M

## TOMATO PRODUCTS

Agritalia s.r.l. - E  
Alminter S.A. - M, S  
Atalanta Corporation - I, IA  
BMT Commodity Corp. - I  
Bedemco, Inc. - IA  
Camerican International - I, IA, DFB  
Cento Fine Foods, Inc. - I, D  
Coluccio & Sons, Inc. - I, D  
Filiberto Martinez, S.A. - E  
Food Specialties Trading LLC - I  
Goya Foods, Inc. - I, M  
Great Lakes International Trading, Inc. - I, E  
Industrias Alimentarias de Navarra S.A. - E  
Inter-Iberia Comercio de Alimentos, Ltda. - E  
Italfoods, Inc. - I  
J.M.B. International, Ltd. - E  
JFE Shoji Trade America, Inc. - I, E  
La Formica SRL - E  
Madama Oliva s.r.l. - E  
Manuel Mateo Candel S.L. - E  
McLane Global - I  
Meridionale Alimenti SRL - E  
Mercantum (U.S.) Corp. - I, E, IA, DFB  
Musco Food Corp. - I  
National Cortina - I  
Oguzcan Tarim Ve Gida Ur. San Tic.A.S. - E  
Pastene Companies, Ltd., The - I  
Pastificio Atilio Mastromauro Pasta Granoro S.r.l. - E  
Port Royal Sales, Ltd. - I  
Productos Bionaturales Calasparra S.A. - E  
RDA S.r.l. - E  
Rema Foods, Inc. - I  
Rispoli Luigi & C. SRL - E  
Ron-Son Foods, Inc. - I  
Safe Food Corporation - I  
Schreiber Foods International, Inc. - I  
Sclafani Corp., Gus - I  
Sinco, Inc. - I  
Sunrise Commodities - I  
Trucco, Inc., A.J. - I  
Unsoy Food Industries Inc. - E  
World Finer Foods, Inc. - I, E, M  
Ziba Nut, Inc. - E, I

## TREE NUTS

1. S-Brazilnuts Inshell & Shelled
2. S-Cashew Kernels
3. S-Cashew Nut Shell Liquid
4. S-Filberts Inshell & Shelled
5. Macadamia Nuts

Abod Success Investment Limited (2) - E  
African Cashew Alliance (2) - E  
Alin Cashews (2) - E  
Apex Ventures Pvt. Ltd. (2) - E  
Arslanturk Tarim Urunleri Ihracat Ithalat A. S. - (4) E

AFICEL-A.Ferreira Industriai Com. Exp (2) - E  
AFRUSE, S.L. - E  
Agritradex Commodities (India) Pvt. Ltd. (2) - E  
Ajanta Industries (2) - E  
Almendras "BOLITAL" S.R.L. (1) - E  
Amberwood Trading Ltd. - E  
Amendoas do Brasil Ltda (2). - E  
Angel Camacho, S.A. - E  
Assorted Food Packers Pvt. Ltd. (2) - E  
Balcorp Limited - E  
Balsu USA, Inc. (4) - I, E  
Bazzini Co., Inc., A.L. - E, I, M  
Bedemco, Inc. - IA  
Bellafrut S.A. - E  
Beneficiadora de Almendra Urkupina S.R.L. (1) - E  
Beneficiadora de Almendras "INGAMA" (1) - E  
Beneficiadora de Almendras Lourdes (1) - E  
Beneficiadora de Almendras Rolando Bowles Rivero (1) - E  
Beneficiadora Puerto Rico (1) - E  
Beneficiadora San Agustin SRL (1) - E  
Bismi Cashew Company (2) - E  
Blair Shipping Services (Pty) Ltd. - E  
Braun & Sons, Inc., J.F. - I, E  
Cashew Export Promotion Council of India - Assn.  
Chandra Cashew Factory (2) - E  
Chandra Cashew Imports & Exports PVT LTD (2) - E  
Cia. Brasileira de Resinas - RESIBRAS (2) - E  
Clement Faugier - E  
Coins Foods and Spices (Pvt.) Ltd. (2) - E  
Commodity Trading Agency (2) - E  
Companhia Industrial de Oleos do Nordeste - CIONE (2) - E  
Dalian Jinyu Foods Co., Ltd. - E  
Ecofruit LTDA (1) - E  
Empresa Industrial Forestal Cabrera Taval- ara S.R.L. (1) - E  
Exportadora Florenzano Ltda. (1) - E  
Finck-Jones-Libby Co., Inc. (1,2) - IA  
Foreign Trade Service Corp. - L  
Franco Agency, Inc., The Richard - IA  
Gigi & Associates Corp. - I  
Golden Macadamias (Pty)/Ltd (5) - E  
Great Lakes International Trading Inc. - I, E  
Gursoy Tarimsal Urunler Gida San. Ve Tic. A.S. (4) - E  
Halomex (2) - E  
Harold Claude Lens (1) - E  
Hermanos Cardenas S.R.L. (1) - E  
Hopewell International Corp. (1,2,3,4) - E  
Hnos. S.R.L. (1) - E  
Import & Export Almendras S.J. (1) - E  
India Food Exports (2) - E  
Indian Resins and Polymers (2) - E  
International Nut Alliance LLC (1,2,4) - I  
JCS Tradecom, Inc. (2, 4) - I  
Jaya Cashews (2) - E  
Jayalakshmi Cashew Exports (2) - E  
Jinnah Shajahan Exports (2) - E  
Jorge E. Gallardo F.S.A.C. - E  
K Subraya Anatha Kamath and Sons (2) - E  
Kalustyan Corp. - I

Kailas Cashew Exporters(2) - E  
 Kairali Exports (2) - E  
 Kerala Nut Food Co. (2) - E  
 Kerala State Cashew Development Corp., Ltd. (2,3) - S  
 Kerala State Cashew Workers Apex Ind. Co-op. (2) - E  
 Krishnan Food Processors (2) - E  
 Kumbukattu Cashews (2) - E  
 Lakshman & Company (2,3) - S  
 Leading Star Trading Company - E  
 Leavitt Corp., The (1,2,4) - DFB, M, I  
 LongAn Food Processing Export Joint Stock Co. (2) - E  
 Long Son Joint Stock Company (2) - E  
 M M K Exports (2) - E  
 Mahavishnu Cashew Factory (2) - E  
 Mangala Cashew Industries (2) - E  
 Maximacs (5) - E  
 Mercantum (U.S.) Corp. - I, E, IA, DFB  
 Mitra Agro Lestari Bersama PT (2) - E  
 Mount Carmel Cashews (2) - E  
 Mundial Exportadora Comercial LTDA (1) - E  
 Nila Exports (2) - E  
 Olam Americas, Inc. - I  
 Olam International Ltd. - E  
 Paratini Comercio E Beneficiamento De Fru- tas Ltda (1) - E  
 Prasad Cashew (Ptc) (2) - E  
 Pratipa Cashews (2) - E  
 Procesadora Boliviana de Alimentos- PROBAL (1) - E  
 Procesadora de Alimentos Santa Isabel (1) - E  
 Progida Tarim Urunleri San. Ve Tic. A.S. (4) - E  
 P.T. Comextra Majora (2) -E  
 Quality Control Inspections - L  
 Quilon Export Enterprises (2) - E  
 R.S. Tinsley (Liverpool) Ltd. (1,2,4) - IA  
 Rajan Cashew Company (2) - E  
 Red River Foods (1,2,4) - I  
 Regional Comercial Importacao E Exportacao Ltda (1) - E  
 Reliable Mercantile Co., Inc. - IA  
 River Green Exports (2) - E  
 SLD Commodities, Inc. - IA  
 Sabirlar Findik Ihracat Ltd. (4) - S, E  
 Sahadi Fine Foods (1,2,4) - I, M  
 Saida Trading Company (2) - E  
 Samsons Trading Co. Pvt. Ltd. (2) - E  
 Satas Foods (2) - E  
 Setton International Foods, Inc. - I  
 Shandong International Service Trade Corp. - E  
 Shunda Food Company Ltd. - E  
 SINDICAJU (2) - Assn.  
 Sociedad Agricola Industrial Blacutt Hnos. SRL (1) - E  
 Sociedad Comercial Import Export Los Alimendros Srl (1) - E  
 Southern Cashew Exporters (2) - E  
 Sree Durga Cashew Factory (2) - E  
 Sreelekshmi Cashew Company (2) - E  
 Star Snacks Company (2) - I  
 Sunrise Commodities (1,2,4) - I  
 Synergy Systems (2) - L  
 Terra Nova Trading, Inc. (2) - IA  
 The Hemisphere Group - I  
 Totally Nuts & More (2,4) - I, IA  
 Tropical Fruit Delights Agroinbo SRL (1) - E  
 Trucco, Inc., A.J. - I

U.D. Mandiri Jaya (2) - E  
 Ultra Trading - I  
 Vegetexco Ho Chi Minh City (2) - E  
 Vijayalaxmi Cashew Company (2,3) - S  
 VINALIMEX (2) - E  
 Vizag Exports (2) - E  
 Waymouth Farms, Inc. - P  
 Western India Cashew Co. (2) - E  
 Worldly Delights, Ltd. - IA, DFB  
 Yavuz Gida Sanayi Ve Ticaret Ltd. (4) - E  
 Ziba Nut, Inc. - E, I

## VINEGAR

Acetificio Carandini Emilio SRL - E  
 Agritalia s.r.l. - E  
 Bodega Perales SL - E  
 Borges USA / Star Fine Foods, Inc. - M  
 Cellers Avgvstvs Forvm S.A. - E  
 Charbonneaux-Brabant - E  
 Colavita, USA - I  
 Drogheria Alimentari S.p.A. - E  
 Emiliani SRL - E  
 Euroaliment P.A.C. S.L. - E  
 Filippo Berio Brand - I  
 Food Specialties Trading LLC - I  
 JCS Tradecom, Inc. - I  
 Jose Paez Lobato - E  
 Malagoli SRL - E  
 Modenaceti Srl - E  
 Monari Federzoni SPA - E  
 Pastene Companies, Ltd., The - I  
 Ponti S.P.A. - E  
 Pompeian, Inc. - I  
 Rema Foods, Inc. - I  
 SAS Fuchs Vinaigrerie - E  
 Schreiber Foods International, Inc. - I  
 Sclafani Corp., Gus - I  
 Sinco, Inc. - I  
 Toschi Vignola - E  
 Vefa Bozacisi A.S. - E  
 Vigo Importing Company - I, P  
 World Finer Foods, Inc. - I, E, M

## WINES & SPIRITS

Acorsa USA Inc. - I  
 Bodegas Navarro Lopez, S.L. - E  
 Bosco Nestore - E  
 CEllers Avgvstvs Forvm S.A. - E  
 Sangeris I Vaque, S.L. - E  
 Tenuta Fernantda Cappello - E  
 Toschi Vignola - E

# AFI PAST PRESIDENTS/CHAIRMEN 1906-Present

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 William J. Juhring  
 Louis B. Parsons  
 Andre L. Causse  
 Lucius R. Eastman, Jr.  
 Louis F. Bridges  
 William A. Camp  
 Herman r. Habicht  
 James W. McGlone  
 Horace C. Moses  
 Carl J. Braun  
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 David Cottam  
 Tom White  
 Andy Gellert  
 Jill Bush  
 Fred Mortati  
 Stephen O'Mara  
 James Libby  
 John Sessler

# Service Directory

## ASSOCIATIONS/TRADE CONSULATES

ASEMESA—Asoc. Exportadorese Industriales de Aceitunas de Mesa  
ASOLIVA Olive Oil Exporters Association of Spain  
Casa do Azeite Associação do Azeite (Portugal)  
Embassy of Morocco  
Indo American Chamber of Commerce  
Saskatchewan Trade & Export Partnership (STEP)  
Specialty Food Association  
Trade Commission of Peru in NY  
Vietnam Trade Office

## ACCOUNTANTS/TAX CONSULTANTS

Marcum LLP  
Mazars USA LLP

## ATTORNEYS

Benjamin L. England & Associates, LLC  
DeLashmet & Marchand, PC  
FisherBroyles LLP  
OFW Law  
Sandler, Travis & Rosenberg, P.A.  
Scarinci & Hollenbeck

## BANKS/INVESTMENT SERVICES

Agrowfi  
EastWest Bank  
Express Trade Capital  
Valley National Bank

## BUSINESS CONSULTANTS

FFF Associates  
Kompass North America  
Safe Food En Route, LLC  
Quality Services International

## CUSTOM HOUSE BROKERS

Alba Wheels Up  
AllWays Freight Forwarding  
Brauner International Corporation  
Engineering & Trade, Inc  
JAF Global Logistics  
J W Hampton Jr. & Co., Inc  
Ken Lehat & Associates, Inc

## CUSTOMS/FDA/FSVP CONSULTANTS

The Acheson Group  
Agrowfi  
Benjamin L. England & Associates, LLC  
Blue Tiger International  
FSMA International  
HACCP Consulting Group  
Ken Lehat & Associates, Inc  
Safe Food En Route LLC  
United Safety Agents

## FOREIGN FREIGHT FORWARDERS TRUCKING & LOGISTICS

Alba Wheels Up  
AllWays Forwarding Int'l., Inc  
Brauner International Corporation  
Freighters LLC  
JAF Global Logistics  
J W Hampton Jr. & Co., Inc  
Ken Lehat & Associates, Inc  
Laufer Group International  
Romark Logistics  
Sunteck Transport Group

## INFORMATION & PROMOTION

The Food Institute  
ICEX Foods From Spain/Trade Commission of Spain

## INSPECTION/CERTIFICATION

Foreign Trade Service Corp  
Quality Control Inspections

## INSURANCE

ARI Global, Inc.  
Coface North America Insurance Co  
Coughlin Insurance Services  
Foa & Son

## LABORATORIES/TESTING

Certified Group  
Eurofins  
Foreign Trade Service Corp  
INDLAB  
Laboratorio Tello S.L.U.  
Quality Control Inspections  
Quality Services International  
SGS Agri Division  
Synergy Systems

## MARKETING SERVICES

Kompass North America

## PRINTERS/ PROMOTIONAL PRODUCTS

White Eagle Printing

## QUALITY ASSURANCE/ STABILITY STUDIES

Foreign Trade Service Corp  
Quality Control Inspections  
Quality Services International

## RESTAURANT & FOODSERVICE

Restaurant Depot

## SAMPLERS

Foreign Trade Service Corp  
Quality Control Inspections

## SOFTWARE

Eximware

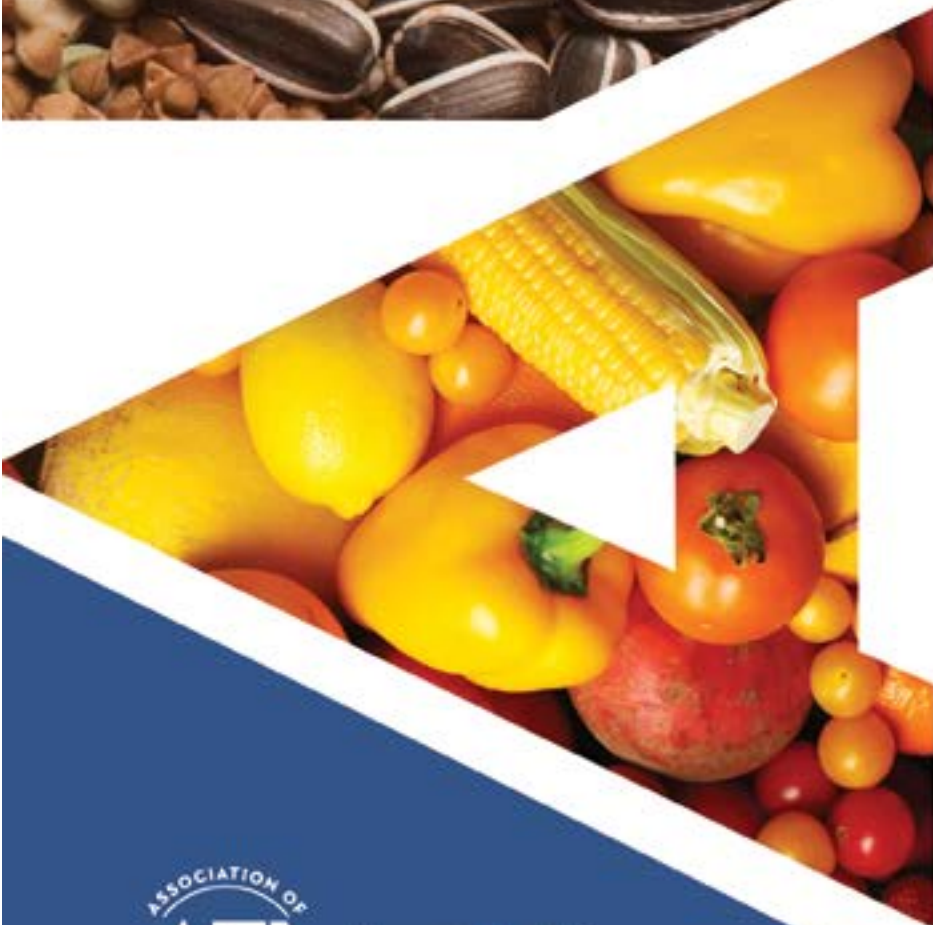
## TRADE DEVELOPMENT

ICEX FoodsFrom Spain/Trade Commission of Spain

## WAREHOUSE AND DISTRIBUTION

Accem Warehouse  
East Coast Warehouse & Distribution Corp  
Federation Distribution Services  
McLane Global  
Port Jersey Logistics





With more than a century of food trade history, AFI is THE authority on the food import industry. Established in 1906, AFI continues to keep its membership in step with industry changes, government regulations, food standards, statistical data and critical Foreign Supplier Verification Programs Training with FDA-recognized curriculum.

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