

EXPORT REQUIREMENTS FOR SHIPPING CHIPPING POTATOES TO JAPAN

(UPDATED MARCH 2020)

MAFF FORMS 1 & 2 FOR COMPLETION & RETURN FOUND ON PAGE 8 (PAGE 9 FOR FACILITIES IN IDAHO)

On February 1, 2006, the Japanese market opened for U.S. chipping potatoes. What follows are requirements for U.S. growers and shippers of chipping potatoes to Japan. This memo was originally produced when the market opened, then updated mostly recently in 2020. Please contact Adam Hollowell. adam.hollowell@bryantchristie.com at Bryant Christie Inc with any questions.

I. General Rules

- The agreement is only for chipping potatoes that will be processed in Japan.
- Shipments may enter all year around January 1-December 31.
- Shipments can only be shipped to approved chip processing facilities in Japan. (Currently, only two facilities, the Calbee plants in Hiroshima and Kagoshima, are approved to receive shipments.)

II. Areas That Can Ship

- Shipments must come from approved states. The 16 approved states for the market are:

Arizona	Montana
California	New Mexico
Colorado	Nevada
Florida	North Dakota
Idaho	Texas
Maine	Oregon
Michigan	Washington
Minnesota	Wisconsin

These were the states covered by the summer 2005 MAFF inspection visit with the exception of **Montana** and **Nevada** which were approved in January 2012. **Idaho**, an approved state in 2006, was removed due to the detection of potato cyst nematode that year, then reinstated in 2017. Note: Shipments from Idaho cannot come from Bonneville or Bingham counties. Packing sheds located in those counties wishing to export to Japan using potatoes not from Bonneville or Bingham counties should contact APHIS prior to seeking to ship.

III. Prior to Shipment

- Production fields and packing facilities that will be used for shipment to Japan must be registered with USDA's Animal and Plant Health Inspection Service (APHIS) and the Ministry of Agriculture, Forestry, and Fisheries (MAFF) in Japan. This is done by answering a few questions regarding location of the field/packing shed on the **Forms 1 and 2**, a one-page document. This process must be completed well in advance of shipment to allow for possible inspection by MAFF.
- Shippers should use the one-page template Forms 1 and 2 at the end of this document. Once completed, send the form to Adam Hollowell at Bryant Christie Inc. (adam.hollowell@bryantchristie.com) to be provided to APHIS for submission to MAFF.
- When filling out Forms 1 and 2, please use the grower name and shipper's name. MAFF is not interested in the owner of the farm if land is being leased. They are interested in the name of the grower who is responsible for the chipping potatoes. The field names can be identified separately. The designation date is when that field was determined to be grown for (or exported to) Japan. For those shipping from Idaho, please fill out the specified **"Forms 1 and 2 (Idaho)"** that includes an additional column for 'county.' (Shipments from Idaho cannot come from Bonneville or Bingham counties.)
- MAFF must provide approval of the fields and sheds before shipments can occur. For new fields and sheds this may include a visit by a MAFF official to inspect the facilities and growing conditions. Note: Inspection has occurred after shipment.

IV. Surveying of Production Areas

- During the growing season, the Japanese government requires field inspections for visual symptoms of golden nematode (GN) and potato cyst nematode (PCN). These surveys can be done through general surveillance and can be conducted by the grower, a state official, or crop consultant. Japan requires such surveys at least twice during the growing season. The survey results will need to be maintained and available if requested by USDA or the MAFF auditor. Specific dates the survey occur should be noted.

VI. Inspection and Certification of Chipping Potatoes Prior to Shipment

- A **Phytosanitary Certificate** is required for the shipment. This PC must describe that the potatoes were inspected by the U.S. plant protection authority and consequently confirm that no quarantine pests or soil are contained within.
- Block 9 of the phyto. must read:
"CHIPPING POTATOES INTENDED FOR HEAT PROCESSING IN JAPAN."
- The following Additional Declaration must appear on the PC:
**"Chipping potatoes intended for heat processing in Japan.
AND
It is not infested by golden nematode."**
- At least 1% of the potatoes must be inspected, by cutting as necessary, per export lot. The definition of a lot is not provided, but it could be as small as one tote or as

large as numerous containers. The inspection upon arrival in Japan is based on whatever the lot is defined as by the shipper. *Note: rejections at either end will be based on the lot, thus if a pest is found the smaller the lot the smaller the rejection. Conversely, smaller lots are more difficult to ship and the paperwork is greatly increased.*

- **Soil** is a priority issue for Japan, so the potatoes must be totally free from soil via brushing and/or washing. *Note: A shipment with soil detected in 2011 shut down the entire program for over a week and threatened to close the program entirely. Please be cognizant of the strict soil requirements.*
- Shipments must be packed in totes or bags woven of plastic fiber; no bulk shipments are allowed.
- **Each tote** must be marked with a sticker or tag that reads:

**PPQ-APHIS-USDA
CERTIFIED EXPORT CHIPPING POTATO
FOR JAPAN**

- The sticker/tag will typically be 6.25 inches in length and 3.25 inches in width and must be written exactly as described above. **Should a tote arrive in Japan without a sticker/tag, it will be rejected.** Thus, shippers are encouraged to place more than one tag on each tote to ensure no totes depart without a tag.
- The tote sticker/tag has been a major issue in shipping to Japan. Please be very careful to include the document with each tote to avoid problems, as well as on the outside of the container (see below).

V. Shipping

- Shipments will need to be shipped in closed containers (i.e., refrigerated ocean containers, reefers.)
- The container must be closed and sealed with a shipping seal by the inspector. The seal number must be documented on the phytosanitary certificate. **Should the shipment arrive in Japan without the seal, the lot will be rejected.** Metal seals are strongly encouraged. More than one seal can be used and included on the phyto if needed.
- The same sticker/tag used on each individual tote must also be threaded through the seal on the container door. Lamination is recommended for the outside sticker/tag so inclement weather during the ocean crossing does not destroy the tag. It is recommended that a second or even third tag also be placed on the outside of the container through the seal just in case the first is damaged. **Should the shipment arrive in Japan without the sticker/tag, the lot will be rejected. Again, this is a priority and should not be omitted.**
- In 2011, APHIS and MAFF developed a broken seal protocol should the container be opened by government authorities as it travels to Japan or the seal be accidentally damaged during transit. See details below.
- In 2011, APHIS and MAFF also agreed to a protocol for consolidating shipments into the ocean container at the port prior to departure, allowing for the final seal and tags to be applied at the port. Please see details below.
- In 2015, APHIS and MAFF agreed to terms of overland shipping. Please consult with the importer as to comply with special requirements for overland shipping, such

as plugging the holes (vents) in the reefer container during the overland routing. As of August 2016, the only approved overland route is from the port in Shibushi to the Calbee facility in Kagoshima.

VII. Additional Comments

- Almost every year since the program began in 2006, the Japanese government has visited the shipping facilities and fields. APHIS works with Potatoes USA, NPC, and state potato organizations regarding these visits. We are seeking to have these visits eliminated, but they continue to occur. New shippers should expect a Japanese inspector visit. This inspection may occur after shipping has commenced and the fields have been approved. Timing is likely during the growing season following the first shipping season, but could occur at any time.
- **Soil, Golden Nematode and Pale Cyst Nematode** may not be present in the shipment; their presence will result in rejection of the shipment and may cause the program to be shut down. The fact that the potatoes are going to an approved facility that has a complex and extensive system in place for waste disposal should take care of the presence of any other pests. However, there have been problems in the past with Columbia Root Knot Nematode (CRKN) and Potato Tuber Moth. It is best that the potatoes be visually free of pests and diseases of concern, particularly CRKN, Bacterial Ring Rot (BRR) and Verticillium Wilt.
- The **broken seal protocol** requires 1) the shipping line to submit an affidavit stating the container was resealed without being opened; 2) APHIS-Tokyo verifies that the required conditions for exporting to Japan were met at the port of departure, including proper sealing of the containers; 3) APHIS verifies that any quarantine risks have been prevented by resealing; and 4) Japan's Ministry of Agriculture (MAFF) also confirms 1-3 above.
- The **trans-loading protocol** requires that shipments must be consolidated in already approved states under the supervision of USDA/APHIS official. A new phytosanitary certificate will be issued that includes: 1) the state of origin of the potatoes, 2) new seal numbers, and 3) an Additional Declaration that says, "This certificate replaces Phytosanitary Certificate (number) issued on (date) at (issuing office), because of a change of container and seal numbers to meet the trans-loading requirements of Japan."

FREQUENTLY ASKED QUESTIONS ABOUT CHIPPING POTATOES TO JAPAN

Why can we only ship chipping potatoes?

- Opening the Japanese market was very challenging. The Japanese government faced enormous pressure from its domestic industry regarding potential pests on imported potatoes. To address this issue, it was mutually agreed that all fresh potatoes shipped to Japan would be processed to address any phytosanitary concerns. These compromises were necessary to open the market.

What is general surveillance, and how do I do it?

- More than likely you are already doing it. General surveillance simply means that you are managing your crops and making sure no unexpected pest or disease appears. In the Japan shipping context, the Japanese government requires that the fields be inspected for pests (especially cyst nematodes) at least twice during the growing season. These inspections can be done by the grower, a crop protection specialist, or an official from a university or state department of agriculture. Written records must be kept of when these inspections occurred, and the results of the inspections. Please be sure to record the date these inspections occur.

What kind of records do I need to keep?

- You will need to keep records describing the location of the field, what crops were planted in the field previously, when planting occurred, any inspections/field treatments applied, and any unusual pest finds or abnormal growing patterns. You should also have records of the seed used. Please see the final pages of this memo for a template to ensure all information is available.

Where can I get the required totes, stickers, and seals?

- The totes are the standard one-ton woven poly totes and the seals are the standard shipping seals.

Which Pesticides Can I Use?

- Japan has its own pesticide residue limits. These can differ from US MRLs, and a handful of pesticides have not yet been approved in Japan. Please work with the Japanese buyer regarding which pesticides are acceptable. Japanese maximum residue levels (MRLs) can be compared with US MRLs at www.globalmrl.com or at the Potatoes USA's Global Database link growers.potatoesusa.com/resources. Please consider which pesticides have tolerances in Japan when considering what to apply.

What sprout inhibitor can I use?

- The Japanese government does not prohibit the use of sprout inhibitors. It has tolerances established for both CIPC and maleic hydrazide. In practice, Japanese growers do not use sprout inhibitors, and there have been public concerns in Japan

regarding the use of such products on potatoes. Please check with your Japanese buyer regarding individual commercial requirements for sprout inhibitors.

Does the Japanese government need to approve my fields/packing shed?

- Yes, Japan wants to be notified of all fields and sheds that will supply Japan on an annual basis. This is done by filling out Forms 1 and 2 (available from Potatoes USA), and then having Potatoes USA submit this document to APHIS. APHIS will send to Japan's Ministry of Agriculture (MAFF). Approval does not typically take long, however for new shippers this usually includes an inspection by MAFF, though the inspection may occur after shipping has commenced and the fields have been approved.

If an inspector finds Columbia Root Knot Nematode (CRKN) in my shipment, what happens?

- The shipment will be rejected and a phyto will not be issued. The Japanese government insists that potatoes exported to Japan be free of quarantine pests, including Columbia Root Knot Nematode.

Are there requirements regarding how soil must be removed?

- The Japanese regulations only say that soil must be removed. It can be removed from washing or brushing or both. A phytosanitary certificate will not be issued for the potatoes if soil is present. Shipping potatoes with soil will jeopardize the entire program.

Could the Japanese confuse skin/netting for soil?

- There is this possibility. The Japanese inspectors may not be familiar with all U.S. potato varieties. Occasionally, some potatoes' skin will rub against each other and fall to the bottom of a container. This can look similar to soil. Potatoes USA has worked with the Japanese government to prepare for this possibility and the Japanese government has confirmed that they understand there is a difference between netting and soil.

Can other countries export chipping potatoes to Japan?

- At the moment, only the U.S. is approved to export chipping potatoes to Japan.

What is next?

- Year-round market access to Japan for U.S. chipping potatoes was secured in February 2020. This was an important development and will allow market demand to dictate U.S. exports more so than was previously the case. The U.S. potato industry and its Japanese allies hope to continue to expand the Japanese market by securing table stock market access, having additional, inland processing facilities approved, and securing amendments to the processing protocol to permit additional end uses.

INFORMATION REQUESTED FOR EACH FIELD BY MAFF INSPECTOR

The MAFF audit seemed to work best if the following information is kept by field. Having this information consolidated in one place is recommended.

Name of Field	
Name of Grower (not necessarily owner of field)	
Name of Shipper	
Seed Source State Please include copy of seed tag	
Variety of Potatoes	
Acres of Field	
Date of Planting	
Dates of General Inspections (General inspections for the field can be done by the grower, pest advisor, extension agent, or agronomist, but must be written. Please note, soil inspections for cyst nematodes are NOT required as part of this protocol, but can be done.)	
Date Field Designated for Japan (When did you decide this field would be used for Japan chipping potatoes?)	
Date of Harvest	

USDA – APHIS Separate Form No. 1 for US Chipping Potatoes for Japan:
List of Designated Production Fields

State	Designation #	Location	Owner Name	Designation Date

USDA – APHIS Separate Form No. 2 for US Chipping Potatoes for Japan:
List of Collection and Packing Facilities

State	Designation #	Location	Owner Name	Designation Date

USDA – APHIS Separate Form No. 1 for US Chipping Potatoes
for Japan: List of Designated Production Fields (*Idaho*)

State	County	Designation #	Location	Owner Name	Designation Date

USDA – APHIS Separate Form No. 2 for US Chipping Potatoes
for Japan: List of Collection and Packing Facilities (*Idaho*)

State	County	Designation #	Location	Owner Name	Designation Date