

1 **Quantification of soy-based feed ingredient entry to the United States by ocean freight**  
2 **shipping and the associated seaports.**

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## 11 **Introduction**

12           As an epidemic of African swine fever virus (ASFV) continues to sweep across China,  
13 the US swine industry remains in a constant state of high alert. As news of the devastating  
14 disease abroad continues to make headlines, pork producers in the US are left wondering if the  
15 safeguards practiced at established ports of entry into the US will be enough to keep ASFV from  
16 infiltrating our shores. Although once not considered a practicable means of disease  
17 transmission, the possibility of ASFV transport and introduction into the US via the importation  
18 of contaminated swine feed ingredients from China has become a topic of discussion as new  
19 scientific evidence emerges.

20           Specifically, physical evidence (ASFV DNA through PCR) has been detected in the  
21 Chinese feed system, specifically in raw grains and meals drying on the ground and in milling  
22 facilities and feed delivery vehicles (1). In addition, experimental evidence of ASFV survival in  
23 multiple ingredients routinely fed to pigs during a simulated 30-day trans-Atlantic journey has  
24 been published (2). Among other viruses, ASFV remained viable in certain ingredients,  
25 including three different soy products: conventional (high protein/low fat) soybean meal, organic  
26 (low protein/high fat) soybean meal and soy oil cake. Recent work by Niederwerder reported the  
27 half-life of ASFV in conventional soybean meal, organic soybean meal and soy oil cake to be  
28 9.6, 12.9 and 12.4 days, respectively (3). In addition, survival of porcine epidemic diarrhea virus  
29 (PEDV) has been demonstrated in conventional and organic soybean meal in a simulated 37-day  
30 trans-Pacific journey, and for up to 180 days post-inoculation in conventional soybean meal  
31 following exposure to cool environmental temperatures (4,5). Furthermore, transmission of  
32 PEDV and ASFV to naïve pigs following consumption of contaminated feed has been  
33 demonstrated (6,7), and the minimum infectious dose in swine feed has been calculated for both

34 viruses (7,8), thereby strengthening the argument that feed is a potential risk factor for the  
35 domestic and transboundary spread of certain viral pathogens.

36 With the understanding that soy-based products may serve as a vehicle for pathogen entry  
37 into the US, the next step is determining how much of, and more importantly, where these  
38 ingredients are entering the country. This is especially challenging considering that there are  
39 currently 328 air, land, and sea ports of entry that are overseen by US Customs and Border  
40 Protection (CBP), and that on annual basis, approximately 2.4 million metric tons of agricultural  
41 products are imported into the USA from China (2). However if for instance, it can be  
42 demonstrated that the vast majority of soy-based feed ingredients enter the US from a handful of  
43 distinct ports of entry, then the monumental task of determining where to focus limited  
44 surveillance resources becomes both manageable and effective. Therefore, the purpose of this  
45 study was to develop an analytic tool to determine the quantity of soy-based ingredients entering  
46 the US from China, and identify high-risk seaports that handle the bulk of these ingredients. This  
47 information would then research provide a simple and effective tool for risk prioritization when  
48 responding to and developing prevention protocols in response to foreign animal disease threats  
49 as they continue to emerge.

## 50 **Methods**

51 Information on the quantity of soy-based feed ingredients and their specific ports of entry  
52 was obtained at the International Trade Commission Harmonized Tariff Schedule website  
53 ([www.hs.usitc.gov](http://www.hs.usitc.gov)), a publically available website that provides a transaction of specific trade  
54 commodities between the US and its international trading partners. Each trade commodity in the  
55 USITC database is identified by a specific 10-digit code known as the Harmonized Tariff  
56 Schedule (HTS), which is used for determining tariff classifications for all goods imported into

57 the United States. Each commodity is classified based on the product's name, use, and/or the  
58 material type, resulting in over 17,000 unique classification code numbers. A close review of this  
59 database identified a total of 8 HTS codes that pertain to soy-based feed ingredients,  
60 including soybeans, soybean meal, soy oil cake and soy oil.

61 Importing countries to be examined was limited to the 43 ASFV-positive countries  
62 currently listed on the Canadian Food Inspection Agency (CFIA) ASFVV Watch List  
63 (reference). These countries, spread across Asia, Africa, and Europe, have been determined  
64 high-risk areas for potential ASFV contamination of feed. Inclusion is based on the presence of  
65 circulating ASFV in the country. The CFIA has recently imposed stricter permitting and  
66 surveillance of raw and unprocessed grains originating from these countries that arrive at  
67 Canadian POEs (CFIA). A comprehensive list of these countries is available in *Appendix A*.

68 Specific queries on the 8 HTS codes and 43 countries of interest were designed on the  
69 USITC website to create a comprehensive analysis providing information on country of origin,  
70 quantity of product, year of entry, and POE into the US for each HTS code. Data was then  
71 exported into Microsoft Excel, where it could be organized and filtered into pivot tables that  
72 describe the quantity of specific product by country of origin and POE. The pivot tables display  
73 data in a manner that ranks the quantity of each product that comes into the US, its country of  
74 origin, and also its port of entry (POE). This information is further broken down into  
75 percentages to determine where the majority of high risk feed ingredients are entering the US.

76 A similar process was utilized to examine a five-year analysis on specific soy-based  
77 ingredients to demonstrate changes in volume and POEs into the United States. The analysis  
78 allows the viewer to easily determine how much of and where certain products of interest are  
79 entering the country. These pivot tables feature a flexible interface that allows specific products

80 to be viewed in greater or lesser detail and ranked in comparison to other importing countries or  
81 POEs.

## 82 **Results:**

### 83 *Soy-based products:*

84 Eight specific 10-digit HTS codes were identified as soy-based commodities with the  
85 potential to be included in swine diets. Each code specifies pertinent details about the  
86 commodity for the purpose of tariff classification at US POEs. These HTS codes, along with  
87 their USITC database description, are provided in Table 1.

<b>HTS Code</b>	<b>Description</b>
1201.10.0000	FLOURS AND MEALS OF SOYBEANS, NESOI*
1201.90.0005	SOYBEAN OIL AND ITS FRACTIONS, FULLY REFINED, WASHED, BLEACHED OR DEODORIZED BUT NOT CHEMICALLY MODIFIED, NESOI
1201.90.0010	SOYBEAN OIL AND ITS FRACTIONS, ONCE-REFINED (SUBJECT TO ALKALAI OR CAUSTIC WASH BUT NOT BLEACHED OR DEODORIZED), NOT CHEMICALLY MODIFIED
1201.90.0090	SOYBEAN OILCAKE AND OTHER SOLID RESIDUES RESULTING FROM THE EXTRACTION OF SOY BEAN OIL, WHETHER OR NOT GROUND OR IN THE FORM OF PELLETS
1208.10.0090	SOYBEAN SEEDS OF A KIND USED AS OIL STOCK, WHETHER OR NOT BROKEN
1507.90.4020	SOYBEAN SEEDS OF A KIND USED FOR SOWING
1507.90.4040	SOYBEANS, CERTIFIED ORGANIC, WHETHER OR NOT BROKEN, EXCEPT SEEDS OF A KIND USED FOR SOWING OR USED AS OIL STOCK
2304.00.0000	SOYBEANS, WHETHER OR NOT BROKEN, OTHER THAN CERTIFIED ORGANIC, NESOI

\*NESOI: Referes to “Not Elsewhere Specified or Indicated”

88

89 In the year 2018, the United States imported a total of 104,707 metric tons (MT) of these  
90 commodities from nine countries included on the CFIA ASFV Watch List. The nine countries

91 include China, Ukraine, Russia, Uganda, Taiwan, Belgium, Togo, Vietnam, and Thailand. Of  
92 this total volume, a total of 55,101 MT, or 52.6% of these soy based ingredients were imported  
93 into the US from China. Ukraine was the second largest exporter of soy-based products into the  
94 US in 2018, with 44,776 MT (42.8%) of product, and Russia being the third largest at 3,396. MT  
95 (3.2%). Each of the remaining countries on the list accounted for less than 1% of total soy-based  
96 product imported into the US. These data are presented in Table 2.  
97

<b>Country of Origin</b>	<b>Sum of Year 2018 (Metric Tons)</b>	<b>% of Total</b>
China	55,101	52.6%
Ukraine	44,776	42.8%
Russia	3,396	3.2%
Uganda	990	0.9%
Taiwan	273	0.3%
Belgium	143	0.1%
Togo	223	0.0%
Vietnam	3	0.0%
Thailand	2	0.0%
<b>Grand Total</b>	<b>104,707.0</b>	<b>100.0%</b>

98  
99 Using data sorting filters, and the “expand” feature of the pivot table, the user can further  
100 explore the import profile of individual countries. For example, import information on China  
101 can be expanded to breakdown the total overall volume of individual soy-based ingredients as  
102 they represent the parts of the whole (Table 3). In this table, it is revealed that ground or  
103 pelletized soy-oil cake accounts for 41,998 MT, or 76.2% of all soy based products entering the  
104 US from China in 2018.  
105

<b>Table 3: Volume Analysis of Individual Soy-based Ingredients from China into US in 2018</b>		
<b>China</b>	<b>Sum of Year 2018 (Metric Tons)</b>	<b>% of Total</b>
SOYBEAN OILCAKE AND OTHER SOLID RESIDUES RESULTING FROM THE EXTRACTION OF SOY BEAN OIL, WHETHER OR NOT GROUND OR IN THE FORM OF PELLETS	41,998	76.22%
SOYBEANS, CERTIFIED ORGANIC, WHETHER OR NOT BROKEN, EXCEPT SEEDS OF A KIND USED FOR SOWING OR USED AS OIL STOCK	7,780	14.12%
SOYBEANS, WHETHER OR NOT BROKEN, OTHER THAN CERTIFIED ORGANIC, NESOI	5,112	9.28%
SOYBEAN OIL AND ITS FRACTIONS, ONCE-REFINED (SUBJECT TO ALKALAI OR CAUSTIC WASH BUT NOT BLEACHED OR DEODORIZED), NOT CHEMICALLY MODIFIED	103	0.19%
SOYBEAN SEEDS OF A KIND USED FOR SOWING	62	0.11%
FLOURS AND MEALS OF SOYBEANS, NESOI	21	0.04%
SOYBEAN SEEDS OF A KIND USED AS OIL STOCK, WHETHER OR NOT BROKEN	18	0.03%
SOYBEAN OIL AND ITS FRACTIONS, FULLY REFINED, WASHED, BLEACHED OR DEODORIZED BUT NOT CHEMICALLY MODIFIED, NESOI	7	0.01%
<b>Grand Total</b>	<b>55,101</b>	<b>100.00%</b>

106

107           The next feature of these data sets is the ability of the user to reorganize the display to  
108 include individual US POEs. For example, Table 4 reveals the volume and percentage of the  
109 55,101 MT of soy based ingredients from China that enter the US at specific POE. In this table,  
110 it is revealed that soy-based ingredients from China entered the US from 13 separate POEs in  
111 2018. Of these POEs, a total of 4 POEs received greater than 88% of all of soy-  
112 based ingredients, including San Francisco/Oakland, CA (60.36%), Seattle, WA (20.54%),  
113 Baltimore, MD (4.13%), and Los Angeles, CA (3.78%).

114

115

<b>Table 4: POE Volume Analysis of Soy-based Ingredients from China into US in 2018</b>		
<b>Importing Country and POE</b>	<b>Sum of Year 2018 (Metric Tons)</b>	<b>% of Total</b>
<b>China</b>	<b>55,101</b>	<b>100.00%</b>
San Francisco, CA	33,261	60.36%
Seattle, WA	11,318	20.54%
Baltimore, MD	2,275	4.13%
Los Angeles, CA	2,085	3.78%
Chicago, IL	1,533	2.78%
Norfolk, VA	1,526	2.77%
New Orleans, LA	1,484	2.69%
Houston-Galveston, TX	681	1.24%
Columbia-Snake, OR	433	0.79%
New York, NY	417	0.76%
Great Falls, MT	60	0.11%
Savannah, GA	18	0.03%
Minneapolis, MN	11	0.02%
<b>Grand Total</b>	<b>55,100.9</b>	<b>100.00%</b>

116

117 Results thus far have presented classification of soy-based ingredients at US POEs, total  
118 volumes and percentages based on country of origin, and individual volumes of specific products  
119 coming from select countries into specific POE. By compiling similar numbers over the period  
120 of 2014-2018, a five-year trend on soy-based imports can be constructed. Figure 1 summarizes  
121 the total volume in metric tons of all soy-based ingredients (8 codes) that have entered the US  
122 from China through the top four 2018 POEs, plus the 15 remaining POEs compiled as one, over  
123 the past five years.

124 **Figure 1:**

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126

127



128 **Discussion:**

129           As the US feed supply becomes increasingly globalized, the significance and risk of  
130 foreign animal disease events as they occur is multifold, particularly when dealing with  
131 agricultural trade commodities from affected countries. Although expanding international trade  
132 allows access to diverse and competitive trade markets, the loss in direct oversight reduces  
133 consumer confidence in commodity quality control and safety. Recent scientific studies have  
134 confirmed that numerous foreign animal viruses, such as ASFV, are capable of surviving for  
135 extended time periods in select ingredients that are commonly fed to pigs and other livestock (2).  
136 Additional work has confirmed that pigs are susceptible to infection with ASFV through the  
137 consumption of contaminated plant-based feed (7). Therefore, it is imperative that swine feed  
138 ingredients imported into the US from ASFV positive countries be treated with increased  
139 scrutiny and caution.

140           Knowledge of this novel risk factor seemingly presents an immeasurable challenge for  
141 US Customs and Border Protection (CBP) due to the sheer volume of imported product. As state  
142 previously, the US imports approximately 2.4 million metric tons of agricultural products such as  
143 meat, grain, vitamins, minerals, and amino acids from China on an annual basis (2). Across the  
144 328 air, land, and sea ports of entry that CBP oversees, it is an additional challenge to decide  
145 where, and over which particular products, the application of limited resources and oversight will  
146 be most effective. Without unlimited resources, rational decisions must be made on where to  
147 concentrate additional surveillance efforts, with a focus on areas where risk of disease entry are  
148 highest. This study represents an attempt to quantify the amount and identify the place of entry  
149 for high-risk feed ingredients originating from ASFV-positive countries. Understanding these

150 metrics is the first step to risk prioritization efforts, and is necessary for appropriate response  
151 actions to be taken.

152 Another novel feature of this study is the ability to determine specific ports of entry for  
153 various products of interest. This information, combined with historic data to support the  
154 relatively stable flow of particular products through specific ports over time, is critical to  
155 understanding the mostly likely ASFV entry points. While it may come as no surprise that the  
156 majority of products originating from China are received at US POEs along the Pacific coast,  
157 having firm numbers to compare and contrast helps to justify where additional ASFV-entry  
158 mitigation resources will be most cost-effective.

159 With the generation of new knowledge on viral half-life in feed, the application of a  
160 “Responsible Imports” approach has been adapted across the US industry (2). Responsible  
161 Imports, a science-based protocol to safely introduce essential feed ingredients from high-risk  
162 countries, is based on the following principles:

163 **Necessity:** is importation of the ingredient an absolute necessity?

164 **Alternatives:** can the ingredient be obtained locally or from a country free from foreign  
165 animal diseases?

166 **Virus:** which virus is causing the concern?

167 **Viral half-life:** is there published information on the half-life of the virus in the  
168 designated ingredient?

169 **Transport time:** what is the projected time for delivery of the ingredient from the source  
170 to its destination?

171 **Viral load:** are there safe products that can be added to the ingredient to reduce viral load  
172 during transport?

173           **Storage period:** is there published information on storage time and temperature that will  
174 reduce residual virus from the ingredient prior to use?

175           Therefore, as production companies across the US develop storage facilities for incoming  
176 products, a new way of thinking is taking shape: one based on “feed quarantine” that brings  
177 together information across several fronts including feed science, microbiology and oceanic  
178 transport logistics to understand how to minimize risk. This approach is intriguing as it is non-  
179 regulatory in nature, and does not negatively impact trade.

180           It should be noted that the results of this study are not without limitations. As shown in  
181 table 2, 55.1 thousand metric tons of soy-based feed ingredients entered the US from China in  
182 2018. It is important to consider that this number represents, along with all numbers presented in  
183 the study, the total amount of product cleared by US Customs at US POEs. USITC defines these  
184 products as “imports for consumption,” intended for use and distribution across all industries and  
185 markets, and does not provide any further information on final product destination or intended  
186 use. It is not possible therefore, using only the methods presented in this study, to determine  
187 how much of a particular product ultimately ends up in the domestic swine supply chain.

188           However, this gap in knowledge does not negate the potential risk of contaminated feed  
189 reaching the US swine population. Modern swine diets contain hundreds of ingredients, all of  
190 which can be mixed and matched for consumption by pigs. Additionally, many of these rations  
191 are prepared at individual feed mills that then distribute the complete feed product to numerous  
192 farms across a region. While a great deal of feed material may be sourced locally, one 2018  
193 analysis found that inventory at a Midwestern swine farm included ingredients from 12 countries  
194 in North America, Asia, and Europe (8). It is therefore entirely possible that ingredients might  
195 make their way from ASFV-positive countries to U.S. farms. And, crucially, it might not be the

196 ingredients themselves that matter the most: the trucks and packaging that carry them may also  
197 be capable of spreading disease.

198         While information on soy-based products is immediately applicable in developing  
199 response strategies for ASFV, there is also a wider utility and potential that is revealed from this  
200 analytical process. Increased globalization has also brought a greater number of adverse health  
201 events that have been attributed to contaminated or infectious food commodities imported from  
202 abroad and consumed by both animals and humans. The hazards that foreign food commodities  
203 have the potential to possess include products that are adulterated either intentionally or  
204 unintentionally, foreign infectious diseases, and dangerous contaminants. This same analysis and  
205 organizational method can be applied to nearly any foreign trade commodity of interest. In fact,  
206 the USITC website contains over 17,000 unique trade commodities, organized by searchable  
207 terms that can, by using this data analysis process, be displayed in an easy to understand format.  
208 Applying this information to risk prioritizations plans can have broad reaching implications for  
209 the development of both human and animal food safety protocols.

210         In closing, this analytical tool provides an opportunity to gather information that is  
211 important in developing science-based plans to safely import essential ingredients that we cannot  
212 manufacture in the US, along with the selective exclusion of ingredients of limited value and  
213 present significant risk. It is hoped that these efforts will continue to stimulate communication  
214 and collaboration between the feed and livestock industries, resulting in further research into the  
215 emerging concept of “global feed biosecurity”. Ideally, current and future information regarding  
216 the risk of pathogen spread in feed will enhance the accuracy of risk assessments, drive the  
217 continual development of efficacious feed-based mitigation strategies and ultimately, bring the

218 health status in the country of origin into the forefront of philosophies regarding the global trade  
219 of feed ingredients.  
220

221 **Appendix A: CFIA Watch List Countries**

Belgium
Benin
Burkina Faso
Bulgaria
Burundi
Cabo Verde
Cameroon
Central African Republic
Chad
China
Congo
Cote D'Ivoire
Czech Republic
Estonia
Gambia

Ghana
Guinea-Bissau
Hungary
Italy
Kenya
Latvia
Lithuania
Madagascar
Malaw
Moldova
Mongolia
Mozambique
Namibia
Nigeria
Poland

Romania
Russia
Rwanda
Senegal
Sierra Leone
South Africa
Tanzania
Togo
Uganda
Ukraine
Vietnam
Zambia
Zimbabwe

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Figure 1:

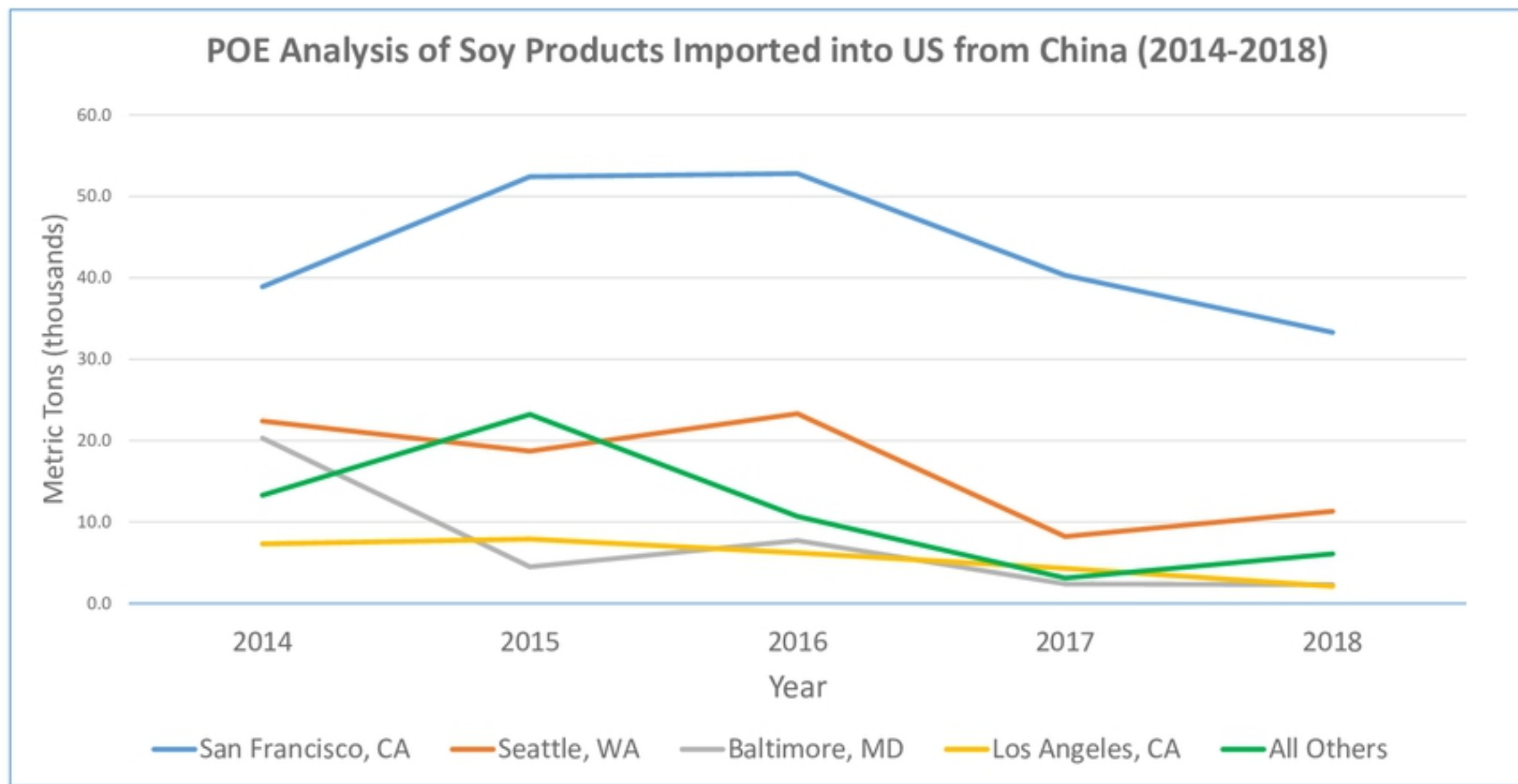


Figure 1