

## *Chapter 5*

### **US Import Procedures for Gasoline**

This chapter discusses how the US Gasoline Rule, which aimed to reduce pollutants in gasoline in order to meet environmental goals, affected foreign refiners seeking access to the US market. It shows how the targets exporting countries are required to meet in order to access the US market were defined and the procedures that have been adopted. It brings out the importance of addressing market access effects for key developing-country exporters when developing the regulations.

## Introduction

In 1990 the United States amended the Clean Air Act (CAA) with the intention of reducing toxic and other air pollution caused by the combustion of gasoline manufactured in or imported into the United States.<sup>1</sup> Three years later, on 15 December 1993, the US Environmental Protection Agency (EPA) promulgated regulations, commonly referred to as the “Gasoline Rule”, implementing that Act.<sup>2</sup>

Two developing-country exporters, Venezuela and Brazil, faced with having to make costly adjustments to their production in order to comply with the Gasoline Rule, charged that the rule was discriminatory because it required imported gasoline to meet different and less favourable standards from those required of domestic gasoline. In 1995 they brought a formal challenge to the WTO, which resulted in the first panel ruling and subsequent Appellate Body ruling following the establishment of the organisation. Both the Panel Report<sup>3</sup> and the Appellate Body Report<sup>4</sup> concluded that the Gasoline Rule was inconsistent with WTO obligations.

The United States responded by revising the Gasoline Rule in a manner consistent with the WTO ruling. The US government has helped foreign refiners to understand and comply with the revised Gasoline Rule in a variety of ways, including sending technical advisors to the foreign refineries. The outcome appears positive. To date, Brazilian and Norwegian companies have made use of the new procedures, and the approach has also been incorporated in other areas of US environmental legislation.

## Development of the measure

In 1977 the CAA set new targets for air quality in metropolitan areas. These targets related, among others, to nitrogen oxides (NO<sub>x</sub>), carbon monoxide, ozone, volatile organic compounds (VOCs), benzene and other toxic air pollutants (toxics). By the late 1990s it had become clear that several metropolitan areas had not met their targets and that a major reason for non-attainment was emissions from automobiles, particularly those operating on petrol (gasoline). Various options to address the problem were considered. Part of the package of measures ultimately adopted by the US Congress included an approach requiring different qualities of gasoline for different areas.

The CAA [Section 211(k)] established two programmes to ensure that air pollution from gasoline combustion would not exceed 1990 levels, and that pollutants in major population centres would be reduced. The first relates to “reformulated” gasoline, which must be sold in certain designated “non-attainment areas” such as the metropolitan areas that were experiencing the most severe ozone pollution. The second relates to “conventional” gasoline, which could continue to be sold to consumers elsewhere in the United States.

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1. Amendment 42 U.S.C. Para 7545 (k). The CAA was originally enacted in 1963 and aims to prevent and control air pollution in the United States.
  2. The Regulation was formally titled: “Regulation of Fuels and Fuel Additives — Standards for Reformulated and Conventional Gasoline”, 40 CFR 80, 59 Fed. Reg. 7716 (16 February 1994).
  3. United States — Standards for Reformulated and Conventional Gasoline, WTO Doc WT/DS2/R (29 Jan 1996), Reprinted in 35 I.L.M. 276, 300 (1996) (hereinafter the “Panel Report”).
  4. United States — Standards for Reformulated and Conventional Gasoline, WTO Doc WT/DS/2/9 (20 May 1996), Reprinted in 35 I.L.M. 603, 611 (1996) (hereinafter “Appellate Body Report”).

The CAA established certain compositional and performance specifications for reformulated gasoline, while requiring that conventional gasoline remain as clean as it was in 1990. For *reformulated gasoline* the CAA specified that its oxygen content must not be less than 2% by weight, its benzene content must not exceed 1% by volume and it must be free of heavy metals, including lead or manganese. These were complemented with certain performance specifications, measured by comparing the emissions performance of reformulated gasoline in representative 1990 vehicles against the emissions performance of 1990-vintage gasoline in such vehicles. This comparison implied a 15% reduction in emissions of both VOCs and toxics and no increase in emissions of NO<sub>x</sub>.<sup>5</sup> For *conventional gasoline* the CAA [Section 211(k)(8)] provides that no refiner, blender or importer of gasoline may sell conventional gasoline that emits VOCs, toxics, NO<sub>x</sub> or carbon monoxide in amounts greater than in the gasoline sold in 1990.

Implementation of these CAA requirements was entrusted to the EPA.<sup>6</sup> In designing the Gasoline Rule, the EPA expressly fixed some specifications for gasoline, while requiring others to be maintained at or below 1990 levels (called “non-degradation” requirements). In particular, during the period 1995-97 a “simple model” was adopted: while specific targets for certain gasoline qualities (Reid Vapour Pressure, oxygen, benzene and toxics performance) were set out, the parameters for others such as sulphur, olefins and T-90 were expressed as non-degradation requirements to be maintained at or below 1990 levels (Table 5.1). It is important to note that this approach changed considerably when the “simple model” was replaced with a “complex model” from 1 January 1998.<sup>7</sup> Under the conventional gasoline programme, however, non-degradation requirements apply to all conventional gasoline requirements (Section 80.41, Gasoline Rule; see Table 5.2).

In order to judge compliance with non-degradation requirements, the EPA was directed to determine the quality of 1990-vintage gasoline as a benchmark against which reformulated and conventional gasoline could then be compared in the future. These determinations, known as “baselines”, were to be undertaken either on a refinery by refinery basis (individual baselines) or derived from the average characteristics of *all* gasoline consumed in the United States in the 1990s (statutory baselines). The rules for establishing these baselines varied depending on the nature of the entity concerned (Section 80.91, Gasoline Rule). Critically, the rules established for domestic refiners and blenders differed from those applied to importers of gasoline.

In general, any domestic refiner could obtain an individual baseline: the annual average level it achieved in 1990. To establish an individual baseline, a refiner had to

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5. Section 211(k)(2)-(3), CAA. For 2000 and beyond the CAA requires new reformulated gasoline standards calling for a 20-25% reduction in emissions of VOCs and toxics, depending on the EPA’s considerations of feasibility and costs.
  6. In fact, the EPA has regulated the environmental quality of gasoline since 1973, when the first regulation dealing with lead content was promulgated.
  7. In particular, non-degradation requirements for reformulated gasoline only applied under the “simple model”. Thus, from the beginning of 1998 when the “complex model” was adopted, reformulated gasoline no longer has non-degradation standards and thus the issue of individual foreign refinery baselines, central to this study, is no longer relevant for reformulated gasoline. The specific standard for Reid Vapour Pressure also only applied during the “simple model” period. Thus, as reflected in Table 5.1, after 1998 the reformulated gasoline standards relate to: VOC, toxics and NO<sub>x</sub> emissions performance as well as benzene and oxygen content. Non-degradation requirements still apply to conventional gasoline, however,

show evidence of the quality of gasoline it produced or shipped in 1990 (Method 1). If that evidence was not complete, then it had to use data on the quality of blendstock<sup>8</sup> it produced in 1990 (Method 2). If these two methods did not yield sufficient evidence, the refiner was also required to use data on the quality of post-1990 gasoline blendstock or gasoline (Method 3).

Importers, on the other hand, were subject to less flexible rules for establishing individual baselines, which in essence obliged them to comply with statutory baselines: a value based on the average characteristics of *all* gasoline consumed in the United States in the 1990s. The EPA's reason for doing so was an assumption that it would be extremely difficult to verify individual baselines and enforcing compliance in foreign jurisdictions.<sup>9</sup> Strictly speaking, importers could also establish an individual baseline, but only in the unlikely case that they were able to provide the data needed for Method 1; unlike domestic refiners, they were not allowed to establish an individual baseline based on secondary or tertiary data, *i.e.* to apply Methods 2 or 3. In short, if an importer could not produce Method 1 data, it was obliged to apply the statutory baseline. Exceptionally, importers that imported in 1990 at least 75% of the production of an affiliated foreign refinery were treated as domestic refiners for the purpose of establishing baselines. These rules, set out in summary form in Tables 5.1 and 5.2, went into force on 1 January 1995.<sup>10</sup>

**Table 5.1. Gasoline Rule specifications for reformulated gasoline**

Criterion	Domestic refiners	Importers
<i>Simple model (1995 through 1997)</i>		
Specified criteria for Reid Vapour Pressure, oxygen, benzene and toxics	Fixed criteria specified in Gasoline Rule	Fixed criteria specified in Gasoline Rule
Non-degradation requirements for sulphur, olefins and T-90	Maintained at or below domestic refiner's 1990 <i>individual</i> refinery baseline levels	Maintained at or below 1990 <i>statutory</i> baseline levels
<i>Complex model (1998 and thereafter)</i>		
VOC, toxics and NOx emissions performance; oxygen and benzene content	Fixed criteria specified in the Gasoline Rule	Fixed criteria specified in the Gasoline Rule

Source: Based on US regulations.

**Table 5.2. Non-degradation requirements for conventional gasoline**

Criterion	Domestic refiners	Importers
All conventional gasoline requirements	Maintained at or below domestic refiner's 1990 <i>individual</i> baseline levels  (N.B. all gasoline in excess of the <i>volume</i> sold by the refinery in 1990 shall be measured against the statutory baseline)	Maintained at or below 1990 <i>statutory</i> baseline levels

Source: Based on US regulations.

8. Blendstock is unfinished gasoline that has to be blended in order to be sold as finished gasoline.
9. See Appellate Body Report, pp. 25-26. At the same time, the EPA decided against using statutory baselines for domestic refineries owing to the magnitude of changes and physical and financial costs entailed by compliance. Exceptions apply, however, to special cases (such as refiners with only partial or no 1990 operations, and blenders with insufficient Method 1 data) which are also assigned the statutory baseline.
10. The complex model went into force on 1 January 1998.

## Trade issues and the responses of developing-country exporters

Prior to the entry into force of the Gasoline Rule, both Venezuela and Brazil complained that they would encounter considerable difficulties and negative trade impacts on their exports of gasoline to the United States as a result of the rule. In particular, they claimed that by permitting domestic refiners to determine individual baselines, while obliging foreign refiners to follow statutory baselines, the EPA treated imported gasoline less favourably than domestically produced gasoline. For example, while imported gasoline with one or more parameter levels above the statutory baseline could not be directly sold in the US market, gasoline of identical quality but produced in a US refinery could be freely sold on the US market, provided that it conformed to that refiner's individual baseline.

In early 1994, shortly after promulgation of the Gasoline Rule, Venezuela filed a complaint against the United States under the dispute settlement procedures of the 1947 GATT. In May 1994, apparently in exchange for withdrawal of the complaint, the EPA published a proposed amendment to its reformulated gasoline regulations that would have addressed these concerns.<sup>11</sup> In particular, it suggested criteria and procedures by which foreign refiners could establish individual refinery baselines in a manner similar to that required for domestic refiners.<sup>12</sup> The EPA's proposal of May 1994 never entered into force, however, as the US Congress enacted legislation in September 1994 denying the funding necessary for its implementation.<sup>13</sup>

Following the failure of this initiative, Venezuela protested that its national oil company, Petroleos de Venezuela, S.A. (PDVSA), was obliged to make costly adjustments to its production in order to meet the statutory baseline requirements, which in turn adversely interfered with its investment programme to the detriment of other important investment projects. These adjustments, it claimed, had reduced the volume and value of Venezuela's current and anticipated gasoline exports to the United States below the levels that would have prevailed if PDVSA had been allowed to establish an individual baseline (Panel Report, Para 3.14).<sup>14</sup> Brazil complained that the gasoline that it had previously exported to the United States as "finished" gasoline had as a result of the Gasoline Rule been downgraded to "blendstock", which sold at a lower price (Panel Report, Para 3.14).

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11. Environmental Protection Agency, "Regulation of Fuels and Fuel Additives: Individual Foreign Refinery Baseline Requirements for Reformulated Gasoline", 40 CFR 80, 59 *Federal Register* 22800 (3 May 1994). See also, "EPA Announces Fuel Plan for Venezuela; Threatened GATT Complaint is Shelved", 11 *International Trade Reporter* (BNA) No. 13, at 504 (30 Mar 1994).
  12. Pursuant to this proposal, foreign refiners would be allowed to establish an individual baseline using Methods 1, 2 or 3. If the individual baseline was approved by the EPA, importers could use it for the purpose of certifying the portion of reformulated gasoline imported from that particular refinery into the United States. However, the use of individual foreign refinery baselines would be subject to various additional strict requirements, aiming at ensuring the accuracy and respect of the foreign refinery's individual baseline with respect to gasoline shipped to the United States and verifying the refinery of origin. Furthermore, it would not apply to conventional gasoline.
  13. Department of Veteran Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, Pub L No 103-327, 108 Stat 2298, 2322 (1994).
  14. In overall terms, the total volume of gasoline imported into the United States, including that from developing countries and economies in transition as a whole, has increased annually since 1995 in spite of the entry into force of the Gasoline Rule. See Table 5.3.

In January 1995, Venezuela, joined in April 1995 by Brazil, challenged the Gasoline Rule under the newly established WTO dispute settlement mechanism. Both the dispute settlement panel and the subsequent Appellate Body ruled against the United States. Notably, the Appellate Body found that the United States made two key omissions when developing its regulations.

**Table 5.3. Imports of motor gasoline and gasoline blendstocks into the United States by country of origin**

Thousands of barrels a year

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000
Total imports into the United States	147 344	121 527	122 722	100 226	137 223	114 139	184 034	185 985	189 855	218 524	237 745
<i>Imports from developing countries and economies in transition</i>											
Arab OPEC: Algeria, Kuwait, Saudi Arabia, UAE	13 465	12 340	10 478	5 758	1 404	4 142	8 889	11 591	9 855	17 707	3 416
Other OPEC: Gabon, Indonesia, Nigeria	184	0	0	0	0	0	163	515	329	799	228
Venezuela	28 517	19 334	23 891	18 292	12 177	13 753	29 312	34 406	35 295	38 903	36 847
Argentina	2 449	831	39	373	11	0	1 429	1 088	6 827	7 414	9 976
Brazil	9 052	5 719	6 184	10 632	9 923	1 755	2 761	1 407	5 822	5 178	11 499
Cameroon	0	0	0	0	0	0	0	0	0	185	241
China	791	1 262	2 141	162	324	0	0	222	0	2 357	3 748
Colombia	0	0	0	0	0	0	97	0	218	293	1 793
Ecuador	0	0	0	0	0	0	0	0	627	359	492
Egypt	0	0	0	0	0	0	0	0	0	267	0
India	0	0	0	0	0	0	0	0	0	196	682
Malaysia	0	0	0	333	0	0	0	0	0	0	17
Mexico	1 002	1 778	2 268	2 033	459	3 067	1 791	1 709	1 623	3 397	2 356
Netherlands Antilles	1 425	1 894	1 238	859	757	0	879	2 497	318	51	558
Peru	0	0	0	0	0	0	0	141	0	0	110
Romania	4 313	517	1 285	0	1 180	0	1 652	2 430	685	1 907	0
Singapore	231	0	108	0	298	0	445	0	257	1 549	1 448
Thailand	0	0	0	0	0	0	0	459	332	332	52
Trinidad & Tobago	250	442	953	910	451	554	448	1 271	1 507	1 572	2 301
Turkey	419	0	0	0	0	0	651	0	0	0	0
USSR	124	149	0	0	0	0	1 425	2 422	3 181	1 840	5 444
Total imports from developing countries	62 222	44 266	48 585	39 352	26 984	23 271	49 942	60 158	66 876	84 306	81 208
Imports from developing countries as % of total imports	42%	36%	40%	39%	20%	20%	27%	32%	35%	39%	34%

Source: Energy Information Administration, *Petroleum Supply Annual*, relevant years, Table 21.

First, the United States had failed to adequately explore co-operation with the governments of Brazil and Venezuela as a means of mitigating the administrative problems it cited as justification for rejecting individual baselines for foreign refiners (Appellate Body Report, p. 28). Second, the United States had omitted to adequately consider the costs and feasibility for foreign refiners of complying with the statutory baselines; in other words, it failed to consider the market access effects of its environmental regulations for key exporters. Here the Appellate Body noted that, even though the United States had considered the physical and financial compliance costs for its own domestic refiners, “there is nothing in the record to indicate that it did other than disregard that kind of consideration when it came to foreign refiners” (Appellate Body Report, p. 28).

### Responses to developing-country concerns

After the release of the WTO Appellate Body’s report, the EPA published a notice inviting public comment on the Gasoline Rule, in order to identify options for domestic compliance with that determination and supply data concerning the way various alternatives will affect the environment and public health.<sup>15</sup> It then proposed<sup>16</sup> and promulgated<sup>17</sup> rules revising the requirements for imported gasoline in a manner intended to implement the WTO ruling. The consequent regulation, titled the Regulation of Fuels and Fuel Additives: Baseline Requirements for Gasoline Produced by Foreign Refiners, allows foreign refiners to establish individual baselines on the basis of requirements similar to those of domestic refiners (1997 Foreign Refiners’ Gasoline Regulation). Foreign refiners seeking to take advantage of these regulations have to meet a number of additional requirements to address issues unique to refiners located outside the United States, including the following:

- The foreign refiner must establish a refinery baseline of the quality and quantity of gasoline produced at the refinery in 1990 that was used in the United States [40 CFR § 80.94(b)].
- The foreign refiner becomes subject to all requirements that apply to domestic refiners, such as record keeping, reporting, and sampling and testing [40 CFR § 80.94(c)(1)].
- The foreign refiner must conduct additional sampling and testing necessary to demonstrate which gasoline produced at the foreign refinery is actually imported into the United States [40 CFR §§ (f) and (g)].
- The foreign refiner must agree to allow EPA inspections and audits [40 CFR § 80.94(i)(1)], must agree that enforcement actions for violations of United States laws and regulations related to the individual refinery compliance will take place in US courts [40 CFR §§ 80.94(i)(2)-(4)], and must post a bond appropriate to pay any penalties for non-compliance that are assessed [40 CFR § 80.94(k)].

The 1997 Foreign Refiners’ Gasoline Regulation applies only to standards that remain different for different refineries, *i.e.* the anti-dumping standards for conventional gasoline

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15. Environmental Protection Agency, “World Trade Organisation Decision on Gasoline Rule”, 61 *Federal Register* 33703, 28 June 1996.
16. 62 *Federal Register* 24776 (6 May 1997).
17. 62 *Federal Register* 4553 (28 August 1997).

that rely on a refinery's baseline of historic gasoline quality, and no longer on reformulated gasoline. Furthermore the regulation is optional for foreign refiners. Therefore, if a foreign refiner chooses, it may produce gasoline for use in the United States without having to comply with the requirements of the foreign refiner regulation.

The regulation is accompanied by an annual survey of the quality of all imported gasoline. If the survey shows degradation of the quality of imported gasoline, standards for some imported gasoline are adjusted to compensate [40 CFR § 80.94(p)]. The survey addresses EPA concerns that optional foreign refiner compliance may potentially create an environmental problem and skew the quality of imported gasoline. The possibility may arise because of the problem of adverse selection, *i.e.* foreign refiners with "dirty" individual refinery baselines (which result in relatively easier compliance) have a greater incentive to choose the individual compliance option than refiners with "clean" individual refinery baselines (which result in relatively more difficult compliance).

Since the revised regulation was promulgated in 1997, the EPA has received and approved petitions for individual refinery baselines from Petrobras, the national oil company of Brazil, and Statoil, the national oil company of Norway. No refiner from Venezuela has submitted a petition for individual refinery compliance even though it was a key plaintiff in the original WTO dispute.

During this process the EPA has assisted foreign refiners. For example, in the case of Petrobras, the EPA worked extensively to assist the company to understand and comply with the individual foreign refinery requirements. EPA officials met several times with the Petrobras employees who would be responsible for compliance with the requirements, both in Washington and in Brazil. In addition, an EPA team visited each Petrobras refinery to review the refinery baseline information and indicate what additional information and analysis would be necessary for complete baseline petitions. Thus EPA officials have been available to assist foreign refiners understand the foreign refiner requirements, by telephone and in person. It therefore appears that a satisfactory outcome to the import procedures for gasoline has been achieved.<sup>18</sup>

## Concluding observations

This case study illustrates the importance, when developing environmental regulations, of taking into account their market access effects for key developing-country exporters. That may involve considering the costs and feasibility for developing-country exporters of meeting the standards and exploring possible alternative co-operative solutions.

It also provides an example of positive outcomes for both the country setting the environmental standards and exporting countries. The United States' revised Gasoline Rule, which allows foreign refiners to establish individual baselines on the basis of

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18. Since 1997, the EPA has followed the foreign refiner compliance approach in three additional regulations that include standards based in whole or in part on individual refinery baselines. Each of these regulations includes foreign refiner provisions that are modelled closely on the Gasoline Rule's foreign refiner regulations. They are the following: the gasoline sulphur regulations, which went into effect in 2004 (65 *Federal Register* 6698 [10 February 2000]; codified at 40 CFR Part 80, subpart H); the gasoline toxics regulations, which limit the benzene content of gasoline and went into effect in 2002 (66 *Federal Register* 17230, [29 March 2001]; to be codified at 40 CFR § 80.1030); and the diesel sulphur regulations which go into effect in 2006 (66 *Federal Register* 5002 [18 January 2001]; to be codified at 40 CFR § 80.620).



requirements similar to those for domestic refiners, has subsequently been relied on by Brazil and Norway and has been replicated in other US environmental legislation.

The study also highlights the fact that positive outcomes may require considerable exporter assistance from the country setting the environmental standards. In this case, for example, the EPA undertook extensive work to assist foreign refiners to understand and comply with the 1997 revised gasoline regulations, including travelling to the foreign refineries concerned.

## **Government Regulations**

### **Products of Agriculture, Forestry and Fishing**

*Chapter 6. Limits on Pesticide Residues in Snow Peas*

*Chapter 7. Limits on Pesticide Residues in Tea*

*Chapter 8. Limiting Pesticide Residues in Pineapple*

*Chapter 9. Phytosanitary Measures affecting the Import of Fresh Durian Fruit*

*Chapter 10. Sustainability Labels for Wood and Wood Products*

*Chapter 11. Adapting Turtle-excluder Devices to Local Conditions*

## Acronyms

APHIS	Animal and Plant Health Inspection Service (US)
AQIS	Australian Quarantine and Inspection Service
ASEAN	Association of South-East Asian Nations
BAuA	Federal Institute for Occupational Safety and Health (Germany)
BGA	Federal Health Office (Germany)
BMZ	Ministry of Economic Co-operation and Development (Germany)
CAA	Clean Air Act (US)
CASCO	Committee on Conformity Assessment (ISO)
CBI	Centre for the Promotion of Imports from Developing Countries (Netherlands)
CFC	Common Fund for Commodities
CFC	Chlorofluorocarbons
COLEACP	Europe-Africa-Caribbean-Pacific Liaison Committee
CREM	Consultancy and Research for Environmental Management (Netherlands)
CsC	Commonwealth Science Council
CSE	Centre for Science and Environment (India)
CTE	Committee on Trade and Environment (WTO)
CTF	Consultative Task Force (UNCTAD)
DSB	durian seed borer
EEA	European Economic Area
EFTA	European Free Trade Association
EIA	environmental impact assessment
EPA	Environmental Protection Agency (US)
EPE	European Partners for the Environment
ESA	Endangered Species Act (US)
FAO	Food and Agriculture Organization (UN)
FDA	Food and Drug Administration (US)
FDI	foreign direct investment
FSC	Forest Stewardship Council
GAA	Global Aquaculture Alliance
GATS	General Agreement on Trade in Services

GATT	General Agreement on Tariffs and Trade
GTZ	Agency for Technical Co-operation (Germany)
HACCP	Hazard Analysis and Critical Control Point
IAF	International Accreditation Forum
ICSF	International Collective in Support of Fishworkers
IDM	integrated disease management
IFC	International Finance Corporation
IFCO	International Fruit Container Organisation
IFOAM	International Federation of Organic Agricultural Movements
IGEP	Indo-German Export Promotion Project
IGG	Intergovernmental Group on Tea (FAO)
IGO	intergovernmental organisation
IIED	International Institute for Environment and Development
ILAC	International Laboratory Accreditation Cooperation
ILO	International Labour Organization
IOAS	International Organic Accreditation Service
IPCS	International Programme on Chemical Safety
IPM	integrated pest management
IPPC	integrated pollution prevention and control
IRA	import risk analysis
ISEAL	International Social and Environmental Accreditation and Labelling Alliance
ISO	International Organization for Standardization
ITF	International Task Force on Harmonisation and Equivalence in Organic Agriculture
ITTO	International Tropical Timber Organization
IUC	International Union Chemical testing
JAS	Japan Agriculture Standards
JETRO	Japan External Trade Organization
JWPTE	Joint Working Party on Trade and Environment (OECD)
LDC	least-developed country
LOD	lower limit of analytical determination (or limit of detection)
MAFF	Ministry of Agriculture, Forestry and Fisheries (Japan)
MAP	Mangrove Action Project
MEA	multilateral environmental agreement
MLV	maximum limit value
MRA	mutual recognition agreement
MRL	maximum residue limit

MSC	Marine Stewardship Council
NGO	non-governmental organisation
NMFS	National Marine Fisheries Service (US)
NOP	National Organic Program (US)
NOSB	National Organic Standards Board (US)
NTAE	non-traditional agricultural export
ODS	ozone-depleting substance
OFPA	Organic Foods Production Act (US)
PCP	pentachlorophenol
ppm	parts per million
PVC	polyvinyl chloride
RCO	Registered Certification Organisation (Japan)
RFCOs	Registered Foreign Certification Organisations (Japan)
RIA	regulatory impact analysis
SCS	Scientific Certification Systems, Inc.
SGS	Société Générale de Surveillance S.A.
SMEs	small and medium-sized enterprises
SPS	(WTO Agreement on) Sanitary and Phytosanitary Measures
STIC	Sustainable Trade and Innovation Centre
TBT	(WTO Agreement on) Technical Barriers to Trade
TEAP	Technology and Economic Assessment Panel (UNEP)
TED	turtle-excluder device
UNCED	United Nations Conference on Environment and Development
UNCTAD	United Nations Conference on Trade and Development
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNIDO	United Nations Industrial Development Organization
USAID	US Agency for International Development
USDA	US Department of Agriculture
VOC	volatile organic compound
WHO	World Health Organization
WSSD	World Summit on Sustainable Development
WTO	World Trade Organization
WTTC	World Travel and Tourism Council

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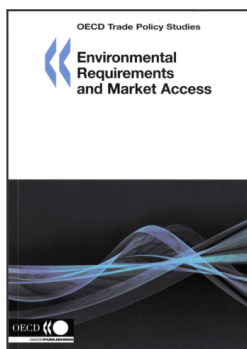
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**From:**  
**Environmental Requirements and Market Access**

**Access the complete publication at:**  
<https://doi.org/10.1787/9789264013742-en>

**Please cite this chapter as:**

OECD (2006), "US Import Procedures for Gasoline", in *Environmental Requirements and Market Access*, OECD Publishing, Paris.

DOI: <https://doi.org/10.1787/9789264013742-9-en>

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