

commerce (Refs. 1 and 2). To be considered a facility engaged only in intrastate commerce, a facility must obtain all its ingredients and sell all its products within a single State. FDA assumes that facilities that participate only in intrastate commerce will be very small and are unlikely to be warehouses or wholesalers. To determine which facilities are in interstate commerce, FDA compared the number of facilities in Census data sets with the number of facilities in the FACTS database. FACTS is a database of facilities regulated by FDA that includes data on operations accomplished by the field (e.g.,

inspections, investigations, sample collections, sample analyses, etc.) (Ref. 3). FACTS and FDA's Operation and Administration System for Import Support (OASIS) identify firms as workload and nonworkload obligations for FDA. FACTS uses different product categories for facilities than the Census datasets, making a direct comparison of the number of firms within categories with the Census datasets difficult. Table 5 of this document presents a count of facilities in the FACTS database by FDA categories. The FACTS database has some facilities that appear in more than one category, so a single facility may

appear more than once in the database. This double counting is not corrected in the count of each type of facility, but is corrected in the total count of facilities. Because the FACTS database gives a count of facilities that FDA inspects, FDA assumes that all facilities in FACTS are in interstate commerce. If we take the total count of facilities from the CBP and Nonemployer Statistics, 171,549, and subtract the count of facilities in FACTS, 71,871, this gives a reasonable estimate of the number of facilities in intrastate commerce 99,678. This calculation is presented in table 6 of this document.

TABLE 1.—COUNT OF FACILITIES IN THE 2000 CBP

NAICs Code	Type of Industry	Number of Facilities
3111 .....	Animal food manufacturing .....	1,710
3112 .....	Grain and oilseed milling .....	913
3113 .....	Sugar and confectionery product manufacturing .....	1,689
3114 .....	Fruit and vegetable preserving and specialty food manufacturing .....	1,796
3115 .....	Dairy product manufacturing .....	1,769
3117 .....	Seafood product preparation and packaging .....	854
3118 .....	Bakeries and tortilla manufacturing .....	10,644
3119 .....	Other food manufacturing .....	2,994
3121 .....	Beverage manufacturing .....	2,748
4224 .....	Grocery and related product wholesale .....	39,721
4225 .....	Farm product raw material wholesale .....	9,546
4228 .....	Beer, wine, distilled alcoholic beverage wholesale .....	4,630
49312 .....	Refrigerated warehousing and storage .....	945
49313 .....	Farm product warehousing and storage .....	516
Subtotal .....		80,475
.....	Substances that contact food .....	22,650
Total .....		103,125

TABLE 2.—COUNT OF FACILITIES IN THE 1999 NONEMPLOYER STATISTICS

NAICs Code	Type of Industry	Number of Facilities
3111 .....	Animal food manufacturing .....	642
3112 .....	Grain and oilseed milling .....	287
3113 .....	Sugar and confectionery product manufacturing .....	1,439
3114 .....	Fruit and vegetable preserving and specialty food manufacturing .....	2,000
3115 .....	Dairy product manufacturing .....	594
3117 .....	Seafood product preparation and packaging .....	693
3118 .....	Bakeries and tortilla manufacturing .....	6,271
3119 .....	Other food manufacturing .....	4,725
3121 .....	Beverage manufacturing .....	1,608
4224 .....	Grocery and related product wholesale .....	32,050
4225 .....	Farm product raw material wholesale .....	4,795
4228 .....	Beer, wine, distilled alcoholic beverage wholesale .....	2,578
4931 .....	Warehousing and storage .....	964
Subtotal .....		58,646
.....	Substances that contact food .....	9,778
Total .....		68,424

TABLE 3.—FACILITIES THAT MANUFACTURE/PROCESS, PACK, OR HOLD FOOD CONTACT SUBSTANCES IN THE NONEMPLOYER STATISTICS

NAICs		Total in NAICs	Adjusted by CBP	Percent Used in Food
322	Paper manufacturing	1,621	1,197	43
3251	Basic chemical manufacturing	534	385	100