

ADVISORY ON MEAT EXPORTS

AVOIDING PROBLEMS WITH EXPORTS OF MEAT/MEAT PRODUCTS TO CANADA

The Department has been made aware of concerns from the Canadian authorities that shipments from the UK of chilled and frozen meat and meat products have been refused entry due to non-compliances.

Examples of such non-compliances include off-condition, staining, putrefaction, odour and mould and surface contamination with faecal material, hair, other foreign matter, and poor defeathering (remaining feather left on the poultry carcasses/ cuts). Some frozen product was found to have thawed and was also off-condition. Furthermore, other non-compliances include cutting premises not registered with required `function activity code` on CFIA website; product description on the label provided on the packaging does not accurately describe the product in the consignment (e.g., regarding technical specifications of cutting of meat). All the products were exported from UK approved premises.

Recommended Action - Increased Physical inspections

In the light of the above information, exporters and certifying OVs are strongly advised to carry out spot checks prior to certification and shipment on all consignments of meat and meat products being exported from the UK to non-EU countries. Checks should be carried out at the final establishment from where the consignment will be shipped, usually an export cold store or cutting plant.

The minimum level of checks (10%) should comprise a verification of documentation and identity for each part of the consignment. Labels should be checked for authenticity and the condition of final packaging assessed for evidence of physical damage or staining, which may have been caused by partial thawing of the contents. Where additional re-assurance is required and in any case for every new supplier and product line/type, the OVs/EHOs responsible for the supplying establishments must also be contacted to confirm the accuracy of the documentation, including the label format, and the UK eligibility of the consignment.

The OV should also contact the EHO responsible for food law enforcement at the export cold store to establish the current level of UK compliance within that premises.

A regime of physical checks (5% or 5 boxes per product line/type per supplier, as below, whichever is lesser) should also be introduced, to focus on those elements of the consignment where deficiencies in the above mentioned documentary or identity checks have been found, or those that have originated from establishments with which the certifying OV is not familiar (and re-assurances have not been provided by the OVs/EHOs of the supplying establishments). Physical checks should involve the opening of boxes to facilitate visual inspection and temperature verification and to check for any of the non-compliances listed above. Consignments undergoing physical checks should not be certified for export until the result of the checks has been found to be satisfactory. A minimum of 5% or 5 boxes per product line/type per supplier (whichever is lesser) in a consignment should be opened. If non-compliance is found in any one of these, further boxes should be opened for checks and, if the meat is frozen, thawing will be necessary. As thawed meat cannot be re-frozen, it will have to be disposed of. Therefore, to avoid economic losses, an option is to seek additional assurances from the OVs/EHOs of supplying establishments regarding the UK eligibility of each and every line, especially of the 5th quarter.

The cold store does not need to have approval for re-wrapping/re-packaging to enable boxes to be opened: firstly because the products are unlikely to be handled even if exposed - i.e. when not wrapped and only placed in a cardboard box - and they will be left in their original packaging once inspection has been done as this has all the information relating to the product; secondly because this opening and closing of boxes, even if replacement packaging was used, is not an operation carried out by the cold store operator as part of its business, but by an OV. The cold store should have oval marks to seal the boxes that were opened for inspection after this is completed. These oval marks should have the approval number of the cold store/cutting plant in which the boxes were inspected. Ideally a label should be applied on the boxes to denote the box was opened for inspection purposes and/or a note be made in commercial documentation to prevent queries by the importer as to why some have an oval mark different from that of the packing establishment. When the OV was using 'inspection labels' these should be stamped with the OV stamp to show they had been applied by the veterinary inspector.

Recommended action - Exporter declaration confirming compliance with Canadian non-hygiene requirements

The exporter is responsible for ensuring the product specifications (e.g., cutting specifications of the meat) match the product description on the labelling of the packaging. The exporter should confirm with the importer that the product specifications adhere to the importing country's guidelines. The OV is strongly advised to check compliance to this. For example, if the product description is 'beef prime rib' on the label then the product should be cut according to that specification standard agreed with the importer and the Canadian import requirements.

Please refer to CFIA Meat Cuts Manual for a description and diagram of specific cuts of meat:

<https://inspection.canada.ca/food-label-requirements/labelling/industry/meat-and-poultry-products/wholesale-meat-specifications/eng/1420220732302/1420220804732>

Defra/DAERA advise the OVs to seek a declaration/letter from the exporter confirming they have understood Canadian requirements as per the Safer Food for Canadians Regulations (SFCR) - specifically labelling, standards of identity and grades:

<https://inspection.canada.ca/food-label-requirements/labelling/eng/1299879892810/1299879939872>

They must also verify that the Shipping marks applied on the boxes/containers/pallets comply with Canadian requirements and would remain on the relevant packaging during transport to the destination in temperature-controlled conditions. See link below on shipping mark guidance from CFIA website:

[Use of Shipping Marks - Canadian Food Inspection Agency \(canada.ca\)](https://inspection.canada.ca/food-label-requirements/labelling/eng/1299879892810/1299879939872)

The declaration/letter maybe provided once or until the OV is satisfied the requirements are met and the FBO is compliant with the Safer Food for Canadians Regulations.

The FBO responsible for the cutting plant must also complete the attached FBO Verification checklist confirming compliance with Canadian non-hygiene requirements.

Required action - verification that the CFIA premises registration for export (for all premises in the supply chain) covers all function activity codes applicable to the exported product.

OV is expected to obtain declaration (7068 Checklist) from the business operator of all premises in the chain that CFIA requirements are met, if certified elsewhere.

The checklist now includes a declaration that the cutting premises and any other premises in the supply chain are registered for all "function activity codes|" applicable to the exported product.

Exporters and certifying OVs must personally verify that the CFIA premises registration for export to Canada covers all function activity codes applicable to the exported product, for all named premises. This information can be verified under the following link: **[Foreign countries establishments eligible to export meat products to Canada - Canadian Food Inspection Agency Summary](#)**

If there is any doubt about the accuracy or physical condition of the material or labelling of the product destined for export from the UK, OVs are instructed not to certify the consignment and as soon as possible seek further advice from the Animal and Plant Health Agency Centre for International Trade in Carlisle or the Department of Agriculture, Environment and Rural Affairs in Northern Ireland.

Exporters and OVs are duly advised that identification of serious non-compliances in future consignments of meat and meat products from the UK may result in the suspension of some or all UK processing and exporting establishments from eligibility to export to the countries in question. If the non-EU country maintains a list of UK establishments from which imports are allowed, the list would have originated from a previous Defra recommendation and it is important for the exporter to ensure that the details (name/address) and UK approval status continue to be correct/valid.
