



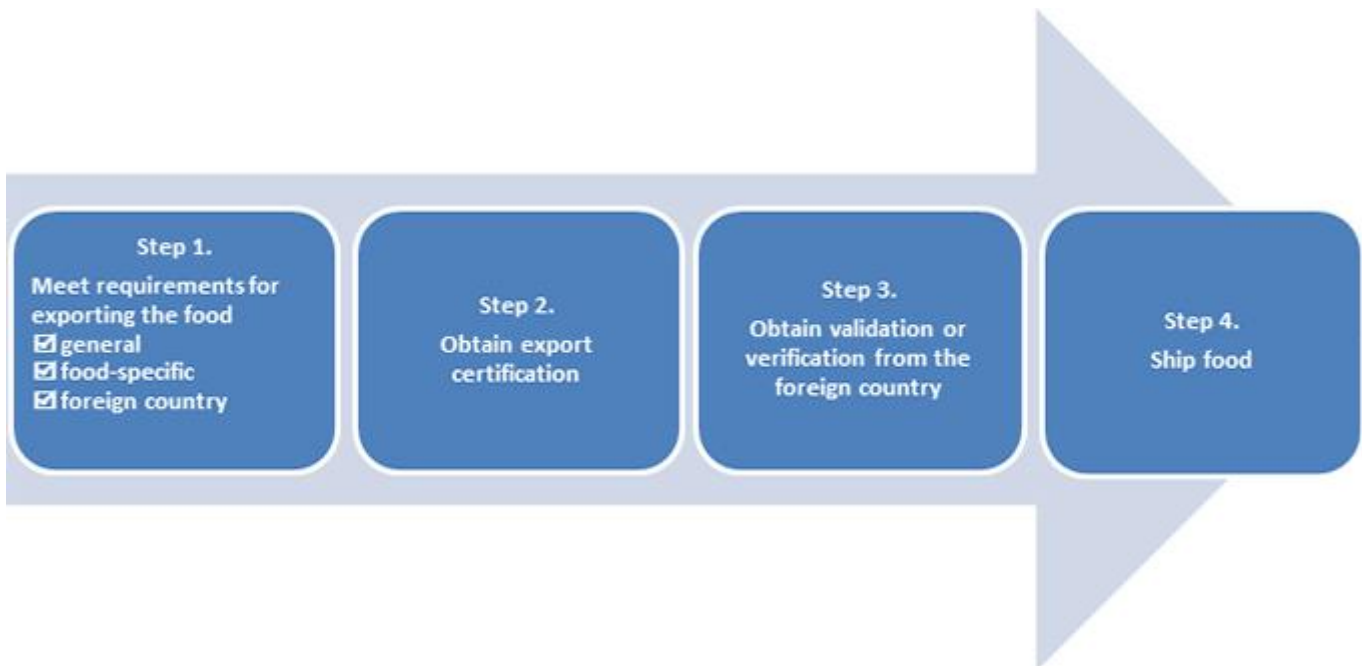
Exporting Food: A step-by-step guide

Introduction

To export food, you generally need:

- a compliant food product
- preventive food safety controls in place
- traceability procedures for your food
- a valid CFIA export licence or registration, if applicable
- documentation of all relevant export information

This guide outlines the considerations and overall process to export food from Canada to help you comply with requirements in the acts and regulations for your products. More detailed information is available on the Food Export page of the Canadian Food Inspection Agency (CFIA).



There are four (4) general steps to take if you wish to export food. The first step is to meet the general, food-specific and foreign country requirements. Second, you must obtain an export certificate for the food you wish to export. Third, you may require foreign country validation or verification in the form of an evaluation or audit. Finally, as the fourth step, you may ship the food product.

Step 1. Meet the requirements for exporting the food

The minimum requirements to export any food under the CFIA's oversight are that the food meets Canadian requirements (unless otherwise stated) and, if applicable, your food business holds a valid licence or registration that is in good standing with the CFIA.

a) General requirements

The food commodity you are manufacturing and/or exporting will determine which Canadian Acts and Regulations you must comply with. These general requirements relate to licensing and registration and food safety, including inspections and traceability.

Licensing or registration

If you need export certificates from the CFIA or your establishment or product to be added to a specific list for any food or food commodities, your food business will need to be licensed or registered. Food businesses that are licensed or registered have demonstrated to the CFIA that preventive controls are in place. The CFIA submits requests to foreign countries or generates certificates only for companies with a valid licence or registration. Allowing companies whose registration or licence has been cancelled or suspended to export food could jeopardize the entire Canadian food industry.

Exceptions: If you export food solely under the *Food and Drug Regulations*, you might not have a CFIA registration or licence number at this time.

Preventive control plan

The preventive control plan (PCP) is a written document that demonstrates how hazards and risks to food products are controlled.

You are required to have a PCP in place if you manufacture, prepare or label food in accordance with Canadian regulations. Your PCP can incorporate additional requirements in relation to exports, or you can prepare a separate document for measures that exceed PCP requirements.

The activities your food business conducts in relation to the food(s) being exported will determine what your PCP covers. If you are only a licenced exporter, and you are buying food from registered or licenced parties, you would be responsible for documenting how the food you are exporting is safe (verifying supplier is licensed/registered and has controls, etc.) and meets the requirements of the foreign country. The PCP documents how your business maintains records and documents,

and can include the certification controls, recall and any notification procedures you have in place.

A PCP covers the same content as a Quality Management Program (QMP), a Food Safety Enhancement Program (FSEP), Hazard Analysis and Critical Control Point (HACCP) Systems or an Export Certification Control Plan (ECCP), for example. For more information, see Safe Food Production Systems.

The export controls should identify all the measures you take outside those specifically for the manufacturing, preparing or labelling of the food and geared to export requirements.

Inspections and fees

The frequency of inspection varies according to the commodity and type of inspection required – some products must be prepared for export under continuous supervision of an inspector and other countries might require only pre-operational inspection weekly or daily, for example.

Fees charged for the inspection, grading and/or issuance of an export certificate are listed in the Canadian Food Inspection Agency Fees Notice.

Traceability

You must keep information on the distribution of the food you exported. It is important to maintain these records.

Lot accountability

You should identify all the certificates issued by the CFIA, the food product certified by each certificate, and the status of the lots certified (in inventory or exported). These records allow exported food products to be traceable to the first shipping destination to allow for rapid recall.

For this purpose, keep easily accessed records of the following information (as applicable per commodity) for each consignment certified by the CFIA:

- the country of export;
- the certificates issued;
- description of the lots:
 - product description (size, grade, type);
 - the scientific and common names of the food;
- the method of production;
- the name and registration/licence number of all the establishments from which the food was sourced, and activities conducted (i.e. slaughter, processing, etc.);

- processing/packing date(s)/codes product identification marks (production code); processing dates;
- net weights;
- total units and unit size of each lot in the consignment;
- the storage conditions of the product;
- consignee name and address;
- consignor name and address;
- the date the consignment was exported;
- transportation information; and/or
- container and seal numbers.

Replacement certificates received from the CFIA must be linked to the original certificate, which the CFIA will cancel.

b) Food specific requirements

The food commodity you are manufacturing and/or exporting will determine which of the following acts and regulations you must comply with.

You will need to comply with any program or certification body requirements beyond those of Canada that have been recognized by the foreign competent authority (see Foreign Country Requirements). Under these programs, the CFIA supports these specific export requirements unique to certain foods and/or countries (see the CFIA's Food Exports).

Examples of food specific requirements include:

- ractopamine in pork
- halal meat to Muslim countries
- Canadian Shellfish Sanitation Program
- organic products

c) Foreign country requirements

You are responsible for ensuring that you know the requirements of countries that you export to and for adhering to those requirements. If your food meets Canadian requirements and that is equivalent to the foreign country requirement, your written PCP is proof of compliance.

If a country is not listed in the export library, it should be assumed that there is nothing known about their requirements. For exporting to these countries, you will need to work closely with your importer, and contact the Canadian Trade Commission or the CFIA Market Access Secretariat for assistance.

You may be eligible to export a food that does not meet current Canadian requirements if you can prove the product will be accepted by the foreign country. Ways to demonstrate this can include:

- evidence that the container and markings comply with the requirements of the importing country
- the contract with the importer clearly stating the quality specifications of the food product
- the lot number or code of the shipment marked on the label or embossed on the container identifies the specific product
- the label on the container of the food does not misrepresent the quality, quantity, composition, character, safety, or value of the food product
- documentation of materials and incoming ingredients sources approved by the country of destination, and of any unique processes or establishment information that affect product compliance
- documentation of health and safety requirements for chemical and microbiological standards including any foreign standards that exceed Canadian standards, or for which there is no Canadian standard
- attestations for any animal health disease status in the area
- supplier quality assurance (SQA) agreements that describe the measures taken to ensure the food meets foreign country standards

Foreign country requirements may change from time to time. If you know about changes in foreign country requirements you should provide this information to the CFIA for follow-up and verification.

Note: Non-compliant product should never jeopardize Canada's trade reputation. Canada protects countries without food safety requirements with a minimum requirement that permits only products compliant with Canadian regulations to be exported.

Resources

Resources to consult for ensuring you meet the requirements for exporting your food include:

- the CFIA export library
- the foreign authority
- your importer or specialized broker
- the CFIA Market Access Secretariat
- Canadian Trade Commission

As part of your export documentation, keep the information you collect as evidence of your due diligence.

No import requirements

If the country has no known importing requirements specific to your product, then you can take the commercial risk to export your Canadian-compliant food. Commercial risk means you accept that all due enquiries have been made and that there is no known impediment to entry of the product into the country concerned. Even if you assume commercial risk, the CFIA can still refuse to provide a certificate if there are known issues with a type of export or a destination country.

Export and eligibility lists

Most countries accept products from Canadian registered or licensed establishments.

If a country has an eligibility list for your product, and you or the supplier (i.e., the food producer or cold store) need to be vetted to be included on the list, contact your nearest CFIA office to begin the process. Approval times can be lengthy, up to six months in some cases.

Some countries require all eligible establishments to be approved by the Canadian authority or by their country and must be on a list before they can export product. This will be indicated in the export requirements for each country.

Step 2. Obtain export certification

The certification of products is how the CFIA demonstrates to foreign countries that there is regulatory oversight and that the product is safe. The CFIA will not issue an export certificate for your products if your food business is not licensed or registered or if you do not have a PCP in place.

The process to obtain a CFIA export certificate varies depending on the commodity and the importing country. The steps can include:

- applying for an export certificate from the CFIA
- meeting the attestations and statements of the export certificate
- notifying the CFIA of any inspection or testing required in order to be eligible to export
- paying the fees for certification, inspection and sampling for your product.

Note: You must request a certificate before shipping your food products. You cannot obtain an export certificate for food that has already left Canada.

The CFIA website provides more information about export certificates and how to complete them.

Notification of production and shipments

Some countries require inspections of production and/or shipping for certain commodities. Your food business is responsible for knowing if the commodities you are exporting are in this category. If so, notify the CFIA before the commodities are produced (if applicable) and/or before they are shipped.

Certificate requests

The commodity and destination country determine the information you need to provide to complete the certificate. The lot accountability requirements are typical of the type of information that the CFIA will need when you request a certificate.

You can request a standard CFIA certificate (where applicable) for countries or products that do not have negotiated certificates or known requirements but you expose your food business to commercial risk.

Records of your certificate requests and shipment details help demonstrate product compliance with foreign requirements.

Replacement certificates

If you need to request a replacement certificate or additional documentation instead of a replacement certificate, the CFIA needs a description of the control measures taken to capture the documentation involved. You need to provide:

- a written explanation of why you need a replacement certificate, which may include:
 - an administrative error on the certificate
 - the certificate is lost or damaged
 - the consignee of the food product certified has changed
 - there is a change in the quantity of product certified
- a description of the procedures relating to the preparation of export documentation demonstrating effort in maintaining accurate export certificate preparation, and any implemented corrective actions (if applicable)
- the original certificate, where possible

Changes requested to a seal number, export stamp/shipping mark number, transport container number, number of cartons, weight and product description are particularly serious. Although situation dependent, requests for supporting documentation might include a bill of lading, exporter's ship manifest, a ship schedule from the freight forwarder or processing dates, for example.

For a change of destination country, the CFIA requires evidence the lot complied with the requirements of the new destination country during processing and storage. It is

your responsibility to provide any information acceptable to the importing country to prove the continuity of control over the lot and compliance with any other conditions required.

If the product has already been imported into the foreign country, a replacement certificate can be issued only if the consignment information, consignor and consignee on the replacement certificate are exactly the same.

Step 3. Validation or verification by the foreign country

Validation or verification is an evaluation by the foreign country, for example:

- Representatives from the foreign country may come to Canada to audit your establishment.
- They may conduct an audit of the CFIA's inspections and findings to verify that the Canadian Food Safety System meets their requirements so establishments under CFIA oversight would be considered as also meeting their standards.
- The visit may be to verify that specific establishments comply with the importing country requirements. In this case, the foreign officers will be evaluating the establishment, and not how the CFIA inspects the establishment. You may be asked to take corrective actions that are beyond the scope of Canadian regulatory requirements to maintain access to their market.

This step sometimes happens before you are eligible to export to a foreign country; it may also be a direct result of your establishment being on the country's eligible establishment lists.

Step 4. Shipping foods for export

Once you have your certificate from the CFIA, you should be ready to ship your product:

- Follow the dates and requirements listed on all certificates. Keep records showing that you met the food safety requirements for the transportation method chosen for your food. You should also have records to demonstrate the shipping and storage temperatures met the requirements.
- Control the certificates and certificate numbers, especially in relation to the use and control of stamps, stickers and seals for your shipments. Any breaks in these controls may prevent the shipment reaching its final destination.

Some countries sample products to test for food safety requirements. Your product may be held under a "test and hold" regime. Work closely with your importer to prepare properly for such situations.

If your shipment is held due to an error on the certificate, you will need to notify the CFIA office where you obtained the certificate. You will need to return the original and provide a valid reason for requesting a replacement certificate.