



Export Requirements for In-Shell Pasteurized Eggs Destined For Canada

PURPOSE

This document sets forth the Quality Assessment Division (QAD) policy and outlines product specifications and facility requirements. This instruction outlines the verification of validated pasteurization procedures and specific requirements for the issuance of the shipping certificate required for the export of in-shell pasteurized table eggs to Canada.

POLICY

Only shell eggs that meet or exceed U.S. Grade A requirements and are certified as “fit for human consumption” are eligible for processing and certification as in-shell pasteurized table eggs for export to Canada.

RESPONSIBILITY

1. USDA Grader

Prior to processing, the USDA grader will conduct a pre-operational inspection to determine that the processing and packaging equipment is clean and in sanitary condition. General sanitation criteria (refer to the Shell Egg Handbook), will be followed for cleanliness of machinery and the immediate processing area. Record findings on the checklist (Exhibit I). Any compounds used during the processing and identification of the pasteurized product must be USDA approved for its intended use (refer to Shell Egg Handbook, Section 5).

The USDA Grader will review the company's documented pasteurization process (i.e. pasteurization temperature and residence time), the FDA approval letter for the pasteurization process, and the approval letter from Canada entitled, [Health Canada Heat-Treatment-Pasteurized-Eggs-In-Shell](#) dated 02/22/2018, for each lot to be certified as pasteurized.

The USDA grader will review the Shell Egg Grading Certificate, Form LPS 210S (Exhibit II), accompanying each lot(s) of graded eggs for compliance prior to processing. Only shell eggs that meet the general export requirements in E-01, including zone restrictions, and the weight and grade requirements in these instruction, are eligible for processing and certification as in-shell pasteurized eggs for export to Canada. Each source egg certificate must document that the eggs were derived from poultry or birds which have not been in contact with any animal or animal product, or animal by-product of a susceptible species from a country or state that was not recognized by CFIA as free of Highly Pathogenic Avian Influenza.



On an hourly basis the USDA grader shall observe processing procedures, packing, packaging, and verify pasteurizing process through records checks, to confirm that the applicant is following the protocol outlined in their approved process. Use Exhibit I to record hourly verification checks. More sheets may be used to accommodate longer run periods.

The grader must confirm that the transport unit has been cleaned and is in a sanitary condition prior to loading. All shipments must be loaded on trailers that are equipped with working refrigeration units. Assure that the refrigeration unit is set at 45°F or lower and is producing cool air before and after loading. The grader can then identify the company seal designated for the transport unit and place the seal number on the certificate (Form LPS-210S). The grader must verify the load to be shipped, but it is not necessary for the grader to be present at the time of the loading.

2. Quality Assurance

The quality assurance system used shall monitor, on a continuous basis, and maintain records of the processing temperature and the residence time of each lot of pasteurized table eggs.

3. Plant Management

Plant management is responsible for demonstrating continued conformance with the pasteurization treatment and describing the design function of the processing equipment and quality assurance system for the production and packaging of the pasteurized product.

Plant management will provide a written procedure describing the measures implemented to maintain the identity of the shell eggs for processing from the time of the receipt until processed, packaged, and labeled.

Plant management must notify a Livestock and Poultry Program representative of a pending export and provide the USDA grader referenced for appropriate labeling and certification.

GENERAL PROCEDURES

I. Eggs Eligible for Processing

Each producer/packer requesting certification of shell eggs destined for export to Canada must provide a Certificate of Conformance (CoC) on company letterhead to accompany each shipment of eggs. The CoC signed by the producer (source flock owner) must declare

“The eggs covered by the attached USDA certificate did not originate from a flock in a layer house with an environment testing positive for the presence of Salmonella enteritidis (SE) or from eggs testing positive for SE.”



All shell eggs must be pasteurized in facilities found to be *Salmonella enteritidis* clean, as determined by semi-annual (every six months) environmental testing. Facilities must complete environmental testing of the processing facility as outlined in these instructions. Environmental testing will be considered valid for 6 months following the date of completion of laboratory results as verified by the USDA grader or Federal-State supervisor (or assistant).

Facilities must appear on the List of Plants Approved to Export Table Eggs to Canada available on the AMS website.

Salmonella Controls

To be eligible for export to Canada, the processing plant must be found to be clean of *Salmonella enteritidis* (negative test results), as determined by semi-annual environmental sampling and testing of the processing plant premises and equipment. Lab results showing a sample(s) positive for SE will result in classifying the processing facility as ineligible for export to Canada, and the plant will be removed from the list on the AMS website. Retesting (swabbing) the environment will not be permitted until an AMS representative has verified that a thorough cleaning of the premises and equipment has taken place.

A. Environmental Sampling Procedures

It is critical that plant management employ fundamental aseptic sampling techniques as referenced in this instruction when collecting samples. The following sampling guidance is being provided:

Sample sites must be pre-selected as described in the section "Selection of Sampling Sites". Each plant is required to provide an environmental sampling kit, which should be checked well in advance of sampling to ensure that all of the necessary equipment has been supplied.

B. Equipment/Supplies

1. Sampling kit including:
 - Refrigerant packs.
 - Individually wrapped sterile cellulose sponges.
 - 10 ml of sterile neutralizing buffer (Difco Neutralizing Buffer is the preferred buffer to be used when the samples will be analyzed at the USDA laboratories listed in this instruction). Use of other buffers will be as directed by the laboratory analyzing the samples.
 - Pre-labeled, sterile sampling bags.
 - Disposable sterile sampling gloves.
 - Polyfoam insulated shipping container.
2. Single use seals
3. Plastic bags



4. Clean shirt, trousers (pants), lab coat, and hair and facial coverings, as appropriate, should be worn. Boots and footwear should be cleaned and sanitized prior to sampling.
5. Fine-tipped waterproof felt pen for labeling samples.
6. Company letterhead stationery to record and accompany the individually identified samples sent to the laboratory.

C. Selection of Sampling Sites

The CFIA guidance for environmental sampling states that a minimum of 50-percent of the swab samples must originate from direct product contact surfaces. Sampling sites may vary among packing plants depending on the type of equipment in use.

MACHINE	
Egg Dryer (Plenum)	
Oiler (Plenum)	
GRADING ROOM	
Scales Conveyor belts	Wooden Pallets/Dividers
	Carton/Box Conveyors
Egg Carriage System	
OTHER ROOM	
Packing Heads	Washroom (Door Handle or Sink Taps)
Clam Shells	GRADED EGG COOLER
	Outgoing Racks
Main Conveyor Belt	Outgoing Packaging Material

Selection of Sampling Sites - Do not swab floor drains.

D. Aseptic Sampling Technique

1. The sampling will be conducted by plant management under the supervision of the USDA grader or the Federal-State supervisor (or assistant) prior to the starting operations. The USDA grader will select the equipment to be sampled and a specially trained plant employee shall aseptically collect and identify samples for submission to the laboratory.
2. It will be necessary to select environmental samples twice annually in each plant electing to export table eggs to Canada. The sampling frequency should be random. The USDA grader will maintain a sample frequency log and the list of sample sites. The list will serve as a reference and maybe discarded following collection of samples for a subsequent 6-month period.
3. Prior to sample collection, plant management and the USDA representative will review proposed sample sites to assure random selection, as suggested in Section C. The ten samples shall be collected in a manner proceeding from the finished product area(s) to the product presented for processing.
4. The following guidance is provided for aseptic sample collections:



- Remove all jewelry (rings, watches, and etc.) and thoroughly wash and sanitize hands. Individuals with sores or cuts on their hands should not take samples.

a) At each site:

- Indicate (legible identification) on the label of the sampling bags the plant number, sample number, sampling site, or other sample information and analysis is for *Salmonella enteritidis*, as stated by plant management
- Rinse and sanitize hands.
- Touching only the cuff of the glove, insert the hands into the gloves. Should anything touch the other areas of the glove, discard it and use another glove to prevent contamination of the sample.
- For kits containing sample bags, an assistant should open the bag by tearing along the perforation at the top, removing the plastic strip, and pulling the white tabs apart until the opening of the bag is wide enough for the sponge. The inside of the bag is sterile and must not be touched, nor should it be left open for more than a few seconds.
- When sampling personnel are ready, the assistant should pick up a wrapped sponge and tear off the top of the wrapper exposing a portion of the sponge. Without touching the sponge, hold the container for access without contaminating the gloves.
- When preparing to swab an area, remove the sponge from the wrapper with a gloved hand. If the surface to be sampled is dry, pre-moisten the sponge with buffer solution. This can be accomplished by removing the top of a buffer tube (being careful not to touch the opening of the tube) and pouring approximately 10 milliliters (1 tablespoon) of buffer solution on the sponge. The buffer tube is not to be in contact with the sponge.

Sampling kits can vary in design. Some sampling kits contain sterile sponges already pre-moistened with the neutralizing buffer.

- When swabbing an identified area, vigorously rub the sponge over the surface to be sampled until any soil is removed. If excess fluid is present, wring the fluid in the sponge into the sampling bag, and continue rubbing the sample site. With one sponge, sample as much of the surface in question as possible. The assistant should aid in the sampling by exposing or stabilizing the surface to be sampled without touching it.
 - Upon completion of swabbing the area return the sponge to the sample bag without further contact to prevent contamination. Close the bag by holding it on both sides by the yellow ties, twirl the bag around two to three times over itself, and bend the twist ties in toward each other to form a closure over the bag. Do not twist the twist ties around each other.
 - Discard used gloves.
5. Samples are subject to microbiological analysis and must be placed under refrigeration immediately after collection. Do not freeze the samples.
6. Caution shall be exercised when shipping samples for laboratory analysis. A polyfoam- insulated container should be used for shipping. The samples shall be properly cooled prior to packing with frozen refrigerant packs placed above and below the samples. Additional packing material may be used as an aid to maintaining sample quality during shipment.



Place the envelope containing the sampling information letter on top of the packing material and close the container securely. Seal all official samples or shipping containers prior to mailing or giving them to management for mailing. Laboratories will not analyze samples, which are not properly sealed. Use one of the following methods to seal the shipping container:

- a. **Tape Method** - Strap the circumference (including the bottom and the top of either the external or internal shipping container) with a single piece of 1/4 to 1/2- inch nylon reinforced tape or its equivalent. Bring the two ends of the tape through a "single-use" seal (provided by the company), locking the tape inside the seal when it is closed. Wrap the seal with additional tape to protect it during mailing. Record the seal number(s) used in the "Remarks" section of the sampling information letter.
 - b. **Plastic Bag Method** - Place the sample(s) or inner shipping container inside a plastic bag. Close the plastic bag and "tie" it using 1/4 to 1/2-inch nylon reinforced tape. Secure the two ends of the tape with a seal as in (a.) above. Wrap the seal in additional tape to protect it during mailing. Record the seal number(s) used in "Remarks" section of the sampling information letter.
7. The materials required for preparing the samples are:
- a. **Tape** - Standard 1/4 or 1/2-inch nylon reinforced tape may be provided by the official plant or obtained from your supervisor.
 - b. **Plastic Bags** - Appropriately sized plastic bags may be provided by the official plant or obtained from your supervisor.
 - c. **Single-Use Seals** - The seals will be provided by the company.

Samples shall be shipped to the laboratory immediately after collection. The laboratory samples may be analyzed at an USDA laboratory, or another laboratory determined by the plant. Laboratories providing environmental sampling for the detection of Salmonellae must use methodology approved by the Association of Official Analytical Chemists.

8. The USDA laboratory listed below can analyze environmental samples for the presence of salmonellae:

Science and Technology Program Laboratory
Approval and Testing Division
National Science Laboratory
801 Summit Crossing Place, Suite-B
Gastonia, North Carolina 28054

The National Science Laboratory in Gastonia, North Carolina, will accept environmental samples every day of the week; however, prior notification to the laboratory must be made for Saturday deliveries.



For non-USDA laboratories, the shipping and receiving schedule will depend on the individual laboratory. Plant management shall assume all costs for sampling kits, shipping the samples, and laboratory analysis.

9. When sending samples to either a USDA or non-USDA laboratory, prepare an original and two copies of the sampling information letter using company letterhead stationery. The sampling information letter, if not typed, is to be prepared with ballpoint pen. Be sure all copies are legible and signed by the company representative.
 - a. Indicate the type of testing (*Salmonella enteritidis*) being requested.
 - b. Under the "Sampling Site" column, list the specific sites sampled. For example, if the brushes in the washer are sampled, under the column, list "washer brushes". Do not composite samples.

The company will provide the USDA grader a copy of the sampling information letter for reference purposes. The original and one copy of the sampling information letter shall be placed in a separate envelope and securely taped inside the sample container being sent to the laboratory. Tape the envelope on the interior surface of the insulated shipping container.

The laboratory will enter the results of the analyses on a laboratory sampling report and return the original and a copy to the applicant. The applicant will share the results with the grader, but the grader will not maintain a copy of the laboratory report. The analysis can normally be completed within two weeks of the date of submission.

II. Reporting of Eligible Plants

A list of plants eligible to export table eggs to Canada is available on the Agricultural Marketing Service (AMS) [website](#). The list will be updated when a plant's eligibility to export changes. The USDA grader or Federal-State supervisor (or assistant) will notify the Regional Director of the date that the laboratory results were completed.

The Regional Director is to notify the National Office on the status of plants eligible to export:

- Plant Name and Address (physical address as stated on certificate)
- Plant Number
- Approval Valid Through Date
- Date Approval Rescinded

Notification of continued approval must be received in the National Office within 15 days after the "valid through" date, as shown on the website. Failure to report acceptable analysis results for an updated approval within this 15-day period following the "valid through" date listed on the website will result in the removal of the facility from the list.

III. Packaging and Packing Requirements

The integrity of the pasteurized eggs must be maintained subsequent to processing. This can be accomplished by marking the individual egg or packaging the product in containers designed to show evidence of opening,



such as carton wrap, sealed overwrap, or in the case of loose eggs, cases taped at both ends. All packaging must be clean and new, showing no evidence of previous use. Each shipping case must be identified with the USDA Graded for Export Stamp (or case end label) with the applicable certificate number.

When a label format for either packaging or packing material includes the "Produced From" grademark, the label must be approved by the National office and assigned an approval number. If the printed label for domestic distribution includes marketing claims, the shell eggs presented for production must be certified as meeting the quality standards for the grade identified on the container label.

A. Labeling Requirements – Retail Package Labels

Canadian regulatory labeling requirements specify that shell eggs packaged for retail sale must be labeled in English and French.

1. Product packed in USDA shielded cartons must bear the plant number and lot number. The shell egg cartons must bear a Durable Life Date, also known as a "Best Before" date as determined by the manufacturer. The eggs in the container are expected to meet the grade and size marked on the container until the end of the durable life date. The carton may bear a Durable Life Date, including the day of pack as follows: **Best Before / Meilleur Avant: NO 04**

The exception is the province of Québec, which states the "Best Before" date, may not exceed 50 days from the date of pack. When utilizing a "Best Before" date in excess of 45 days, the following statement must be placed in the comments section of the Form, LPS-210S:

The expiration date declared on the product is the responsibility of the applicant."

2. The Canadian requirements also state that all shell egg cartons must bear the "Keep Refrigerated" and "Garder Réfrigéré" statement.
3. The country of origin statement ("Product of USA" and "Produit des É.-U.A") must appear on the top or front panel of the container.
4. The declaration of the stock rotation date on a carton must include the abbreviation for the month as listed in the table below:

January	JA	July	JL
February	FE	August	AU
March	MR	September	SE
April	AL	October	OC
May	MA	November	NO
June	JN	December	DE



5. Nutritional information must be declared in the correct Canadian "Nutrition Facts Table" format.
6. The carton shall be marked with the words "Pasteurized" and "Pasteurisé" and "Graded USDA A before pasteurization" and "Classé USDA A avant pasteurisation".

B. Labeling Requirements – Shipping Case Labels

1. All shipping case label markings must be clear, legible, and readily discernible. The lettering must be at least ½-inch in height, with the exception of the name and address of exporter, which must be at least ¼-inch in height.
2. All shipping cases of eggs must contain label markings in French and English.
3. Labels must be printed, stenciled, or stamped in a central location on one end of every shipping case or loose-packed pallet. If there is insufficient space on the end panel to place all the necessary information, the English version is to be placed on the end panel and the French translation on an adjacent right side panel.
4. Stenciled markings are not to be applied over printed graphics such as name and addresses, advertising material, etc.
5. The grade and size designation may not be abbreviated. (Example: U.S. Grade A Extra Large instead of "A XL").
6. The country of origin must be indicated as: "Product of USA" and "Produit des É.-U.A.".
7. The name and address of packer or shipper must be shown.
8. Each shipping case or pallet must be identified in some manner that reflects the producer, flock, or houses of the shell eggs to provide traceability of the product, if necessary. This traceability system is not certified by USDA.
9. All product is to be identified with the USDA Graded for Export stamp (with certificate number), lot number, and official plant number.
10. Canada will allow eggs (same size and quality) processed and packaged on five consecutive days to be identified with the same lot number with the provision that production records maintain traceability of the eggs.
11. The shipping case shall be marked with the words "Pasteurized" and "Pasteurisé" and "Graded USDA A before pasteurization" and "Classé USDA A



avant pasteurisation”.

C. Weight Requirements

1. Product must meet the requirements of the marked U.S. weight class.
2. Underweight eggs are to be included as part of the total percentage of undergrade eggs allowed (7 percent undergrades at origin, 10 percent undergrades at destination), however, the USDA tolerances of 3.3 percent maximum lot average and 5 percent maximum individual sample average for underweight eggs in the next lower weight class shall not be exceeded.
3. The minimum individual egg weight stated in the Canadian standards is declared in grams for the weight classes below:

<u>Weight Class</u>	<u>Minimum individual egg weight</u>
Jumbo	70
Extra Large	63
Large	56
Medium	49
Small	42

D. Grade Requirements

The eggs certified as meeting the requirements of at least U. S. Grade A may be based on the results of either online sampling or stationary lot grading. When using stationary lot grading, the quality percentage and net weight information must be reported on the Form LPS-210S. When using online sampling, the net weight must be reported on the Form LPS-210S as the average of the entire days’ production when the product is not isolated during packaging.

1. Product must meet the requirements for U.S. Grade A or better.
2. No more than 7 percent undergrade eggs (including individual underweight eggs) will be permitted at origin.

IV. Refrigeration of Product

Table eggs exported to Canada must be refrigerated subsequent to packaging, and the refrigeration must be maintained during the transport of the product for export. The grader will monitor the refrigeration (temperature defined by the processor) and assure that the transport unit is capable of maintaining such a temperature.



V. Certification

For export purposes the USDA Grader at the processing facility shall sign the Shell Egg Grading Certificate using a ball point pen with blue ink and present form LPS-210S (Exhibit III), and CoC for SE, to plant management. The exporter is responsible for presenting the original certificate to foreign government officials.

The following statements are to be shown in the remarks section of the LPS-210S.

"Pasteurized eggs were produced from US Grade A shell eggs that meet or exceed grade requirements in the Safe Foods for Canadians Regulations (Canada A). The pasteurization process is in accordance with US Food & Drug regulations and the process approved by Health Canada described in Decision Document for Use of Heat Treatment to Pasteurize Eggs In-Shell, dated 02-22-2018."

The export certificate must also contain in the remarks section a certification of originating from a state free from Highly Pathogenic Avian Influenza, by including the following statement.

"I, the undersigned, salaried inspector of the Agricultural Marketing Service (AMS), after due inquiry and to the best of my knowledge, do hereby certify that the poultry or bird products/by-products within this certificate were derived from poultry or birds which have not been in contact with any animal or animal product, or animal by-product of a susceptible species from a country or state that was not recognized by CFIA as free of Highly Pathogenic Avian Influenza."

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