



January 8, 2018

Mr. Brennen Young  
Director  
Regulatory Cooperation  
Regulatory Affairs Sector  
Treasury Board Secretariat  
Government of Canada  
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Dear Mr. Young:

This is a joint response from both the North American Meat Institute (NAMI) and the Canadian Meat Council (CMC) to the Treasury Board Secretariat's request for input on the Government of Canada's regulatory cooperation work with the United States and how best to address regulatory divergences between the United States and Canada.

The North American Meat Institute is the United States' oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products and NAMI member companies account for more than 95 percent of U.S. output of these products. The Meat Institute provides legislative, regulatory, international affairs, public relations, technical, scientific, and educational services to the meat and poultry packing and processing industry. The Meat Institute has member companies from Canada, Mexico, China, Brazil, Japan and Italy as well as the United States. Founded in 1919, the Canadian Meat Council represents Canada's federally registered meat packers and processors as well as the industry's numerous suppliers of equipment, technology and services. For more than 96 years the mission of the Council has been to advocate on behalf of the needs of its members to secure and improve Canada's global meat competitiveness.

The table below illustrates the value of the meat and poultry packaging industries to the U.S. and Canadian economies, as well as the significance of north-south trade.

	Statistics for U.S.	Statistics for Canada
Workers directly employed by the meat and poultry packaging industries	527,019 (2016)	68,468
Meat and poultry industry sales	\$212 billion USD (2015)	\$26.9 billion CDN (2015)
Exports of beef and beef products in 2016	\$6.2 billion USD (\$5.2 without products/offal)	\$2.3 billion CDN (\$2.0 without products/offal)
Exports of beef and beef products in 2016 to U.S. or Canada	\$758 million USD (\$575 without products/offal)	\$1,691 million CDN (\$1,519 without products/offal)
Exports of pork and pork products in 2016	\$5.8 billion USD (\$5.1 without products/offal)	\$3.7 billion CDN (\$3.1 without products/offal)
Exports of pork and pork products in 2016 to U.S. or Canada	\$659 million USD (\$426 without products/offal)	\$1,391 million CDN (\$1,225 without products/offal)

Many (CMC and NAMI) member companies export and import livestock, meat and poultry products from the U.S., Canada, and Mexico and could be affected, depending on the outcomes, by the current North American Free Trade Agreement (NAFTA) modernization negotiations. There are important regulatory differences between the three countries which unnecessarily restrict the movement of perishable meat and poultry products across the common borders. Trade in livestock and meat products among the three NAFTA countries is significant, with combined cross border trade exceeding \$16 billion annually. This level of trade demonstrates the enormity and the importance of livestock, meat and poultry trade between Canada, Mexico and the United States. Therefore, both NAMI and CMC support efforts in the NAFTA negotiations to “do no harm” to agricultural trade in the region and is committed to converging regulations between the three nations to improve efficiency in meat and poultry trade, continue to improve food safety outcomes and significantly reduce food waste.

The supply chains in the meat and livestock industries are highly integrated with a high degree of cross border ownership of meat processing establishments. These, in turn, service the needs of the integrated North American food retail and foodservice industries. Canada and the U.S., for example, serve consumers with similar preferences, and have similar food safety, and animal health risk profiles; both countries follow almost identical science-based risk assessment frameworks for managing food safety and animal health; and both countries require very similar HACCP-based food safety programs in federally-registered meat plants. For these reasons there is a strong rationale for regulatory convergence and shared enforcement mandates. The more the integrated North American meat and livestock industries can achieve high standards of product quality and safety at less cost, the better we are jointly positioned to withstand stiff global competition for increasingly strong exporters in South and Central America, Australia, and Europe. Although other trading blocks are moving forward to reduce regulatory barriers to trade in meat and livestock products, reforms in the NAFTA region, which could ease border transit times and the associated transaction costs by converging standards and testing procedures and other measures to facilitate the delivery of perishable products to consumers, have been difficult to establish and implement..

NAMI and its sister organization in Canada, the Canadian Meat Council (CMC), have been long-time proponents of regulatory reform to facilitate meat and poultry trade. For example, the two groups have encouraged the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS) and the Canadian Food Inspection Agency (CFIA) to remove burdensome import requirements, such as off-loading product from containers at the port of entry for sample collection, that unnecessarily delay entry of Canadian products in to the U.S. and vice versa.

## **RECOMMENDATIONS FOR ENHANCED REGULATORY COOPERATION**

Reconciling product regulations and reducing regulatory barriers and impediments will lower production and shipping costs and could enhance both food safety and animal health in the North American market. Below are recommendations for regulatory reform to reduce costs and improve trade opportunities between Canada, Mexico and the United States.

A modernized NAFTA agreement should formalize a regulatory cooperation framework empowered to bring about development of common approaches to food safety, building upon the work of the RCC and including the following:

- Joint food safety risk assessments – to deliver the best possible science at the earliest stage of decision making, while reducing unnecessary bureaucracy and duplicative efforts between agencies and accelerate food safety innovation and best practices.
- Mutual recognition of food safety technology approvals in all three countries – including interventions, test method equivalency and processing aids.
- Enhanced transparency on sampling (e.g. rate of sampling, targeted pathogens, etc.) and communication of test results, namely, which test was performed.
- Sampling plan changes – reduce sampling lot size to preserve product from being destroyed. When cartons or packages are opened at the border, most importers opt to destroy the remaining product and not allow it into production or distribution channels as a precautionary step to eliminate the risk of adulteration. As a result, significant amounts of product that pass FSIS import inspection daily are unnecessarily destroyed, contributing to food waste.

## **NAFTA REGULATORY COOPERATION PILOT PROJECT PROPOSALS**

The following are detailed pilot project proposals which incorporate some of the above suggestions to improve regulatory cooperation in the NAFTA region:

### **1. Laboratory Sampling Pilot Project**

- As an interim step in achieving mutual recognition of the equivalence of the relevant regulatory agencies inspection programs shipments would be sampled for laboratory analysis at the originating federally-inspected establishment, including cold storage facilities, instead of undergoing re-inspection at the port of entry. This sampling would be done at the direction of the importing country's regulatory agency and conducted by eligible designees including employees of either the importing or exporting country's regulatory authority, or such other designee of the importing country's authority, e.g. including an inspection house, when this is the most cost-effective option. Costs of such sampling and testing would be borne by the exporting country.
- Allow federally-inspected facilities to host onsite inspection house (I-House) operations, regardless of proximity to border, allowing imported product to bypass re-inspection at the border and instead be federally-inspected at the destination facility.
- Allow imported product designated (Labeled/Certified) for intended use in preparing "Artisan and other Fully-Cooked Ready to Eat (RTE) meat and food products," to move to federally-inspected establishments for further processing, eliminating redundant microbiological testing at the border. Note: the product may already be tested by an accredited lab on behalf of the federal establishment (e.g. for Listeria, E.coli, species) and should not be re-tested at the border (audit testing is ok). These test results should be made available to the importing country by the exporting country.
- Adoption of a "Stop, Drop, Inspect and Roll" meat import project between Canada, Mexico and U.S. – allow product being imported from Mexico (or Canada) by U.S. firms to continue on to Canada (or Mexico) after "dropping" part of the load in a federally inspected establishment in the U.S. This will increase transportation efficiency and lower costs and the carbon footprint of these activities.
- Establishment of a common "window" for an E-document transmission and communication system in the NAFTA region to facilitate review and clearance of meat shipments crossing common borders.
- Canada and Mexico, as two of the United States' largest protein trading partners, should be priority countries included in the new export module of the electronic documentation system (called the Public Health Information System) that the USDA is developing. If successful, this system could eliminate the hard copy paper documents that are currently required to be carried by trucks today and greatly improve border-crossing times by avoiding routine inspection issues. This seems like a natural application given the daily volume of shipments and technological advancement and proven capabilities of all three countries. Documentation covering technical information and test results must also be transmitted electronically to expedite shipments.

- Expansion of existing “trusted trader” programs to allow companies with facilities in multiple NAFTA countries with strong records of safety and reliability to reduce border inspection requirements when product remains under same-company control.
- Adoption of mutual recognition/approval of processed product ingredients.
- Establishment of equivalency agreements for label claims and quality related specifications for government programs.
- Establishment of equivalency and consistency in packaging material approvals – including labeling.
- Elimination of the requirement to place a “CAN” brand or tattoo on live Canadian cattle imports into the U.S. – for direct slaughter. The presence of a Canadian Cattle Identification Agency ear tag should be sufficient. Branding increases animal stress and adds unnecessary additional challenges to ensuring animal welfare.
- Elimination of the requirement to have certification that live Canadian cattle imports are born after March 1999. This requirement was established in 2007 as part of the suite of measures implemented to protect the U.S. from the relatively low risk of Canadian cattle born prior to the date when USDA determined the Canadian BSE feed-ban was effective. The specific measure is no longer relevant as it is extremely unlikely that 18 year old cattle exist that would be in a condition to be shipped today. This is an onerous certification requirement that adds transaction cost with no benefits.

## **2. Pilot Project to Demonstrate the Feasibility of Eliminating Border Re-Inspection of Meat Trade between Canada and the U.S.**

Re-inspection of meat at the Canada-U.S. border should be eliminated, starting with a pilot project to demonstrate feasibility. Meat from the United States that is exported to Canada is already inspected by USDA in accordance with CFIA requirements and the meat is marked with “US Inspected and Passed Department of Agriculture” legend. Canadian meat exported to the U.S. is similarly inspected by the CFIA to the food safety and animal health standards of the U.S. and marked with the Canadian Meat Inspection Legend. The border inspections of approximately 10% of all Canadian and American meat are merely “re-inspections” of USDA and CFIA inspected meat. Re-inspecting meat in its final package in a box in a truck is not nearly as worthwhile as inspecting meat while it is being processed in the facility. Redirecting trucks to “inspection centers” also wastes time and fuel, increases the carbon footprint of this

activity and causes extra wear and tear on vehicles through more mileage. Both Canada and the U.S. currently approve the establishments that are eligible to export to the other country. Periodic audits of these approved establishments are performed, and export eligibility can be revoked at any time should the establishment be deemed to not satisfy the other country's standards.

The Canada-U.S. Free Trade Agreement provides the legal basis for not re-inspecting each and every load. The Canadian and United States governments should facilitate trade by eliminating the requirement for the re-inspection of meat and microbial testing at the border.

We suggest that a pilot project be established to eliminate border re-inspection for a few participating Canadian and U.S. meat companies using a limited number of border crossings for a one-year period, followed by an evaluation. The evaluation should address outcomes in terms of any risks to food safety and animal health and also economic outcomes (reduced supply chain costs, improved customer service, operational savings to CFIA/FSIS, etc.).

Currently, participants in the Customs-Trade Partnership Against Terrorism program must observe a high degree of security as containers leave registered establishments for shipment to the U.S. This includes bolt or cable seals on containers meeting the ISO 17712 standard, which are only broken if and when the shipment gets directed to an I-house on the U.S. side of the border for re-inspection. The same is true for north-bound shipments from the U.S. for participants in Canada's Partners in Protection program. The major Canadian and U.S. companies involved in cross-border meat trade participate in these trusted shipper programs.

### **3. Imported Product Designated (Labeled/Certified) for Intended Use (e.g Ready to Eat (RTE), Intact Products or for Cooking Only, Artisan and other Fully Cooked Ready to Eat Meat and Food Products).**

We suggest that FSIS allow raw products being imported from Canada to not be assigned microbial testing type re-inspection at the border if the designated intended use is identified, labeled properly and the transport of these products is under controlled movement between the Canadian federally-registered exporting establishment and the approved USDA establishment that administers a lethality treatment.

9 CFR 325.7 allows for transport of domestic meat products, passed with restrictions, between official establishments for further processing. Establishments that produce untested products or products found positive for E. coli O157:H7 or other adulterants may label the product based on the intended use. The product can then be sent to another establishment, which has controls in place that ensure that the product is administered a full lethality treatment (i.e. cooking).

FSIS policy provides that In Plant Personnel (IPP) are not required to sample product that the establishment intends for use in intact or ready-to-eat product, or product that will receive other full lethality treatment at another federally inspected establishment.

<http://www.fsis.usda.gov/wps/wcm/connect/c100dd64-e2e7-408a-8b27-ebb378959071/10010.1.pdf?MOD=AJPERES> .

Domestic product labeled "for cooking only" or that has a designated intended use may move to an establishment that cooks product to a point that eliminates *E. coli* O157:H7 to an undetectable level. Domestic establishments can only place these statements on products for use at official establishments when the Labeling and Program Delivery Division (LPDD) approves the use of instructional labeling statements. LPDD specifies that establishments can only use such statements on products that are destined for official cooking establishments.

If the establishment places a statement identifying the products intended use and ships it to a facility outside the establishment, FSIS verifies that the shipping establishment has controls in place to ensure that the product goes only to the designated establishment that cooks the product.

#### **4. FSIS should expand the “Intended Use” approval to certain imported products**

The following products identified “For Further Processing” should be permitted to have controlled movement from the Import Establishment to the Final Establishment when not tested in the foreign country of origin;

- Imported beef products,
- Imported fresh poultry products,
- Imported cooked beef, and
- Imported fresh pork.

#### **5. Pilot Project on Pre-selection Meat Sampling**

We suggest that the Food Safety and Inspection Service (FSIS) create a pilot project related to pulling samples on randomly selected containers with products identified as “For Further Processing” in foreign Container Security Initiative (CSI) Customs Ports of entry as identified in the link attached

(<http://www.cbp.gov/sites/default/files/documents/CSI%20Ports%20Map%201%20page%20062614.pdf> ).

One of the three core elements of CSI is “To Prescreen and evaluate containers before they are shipped. Containers are screened as early in the supply chain as possible, generally at the port of departure.” This being said, as part of that screening, under the oversight of U.S. Customs Border Protection (CBP) and with the Canadian Competent Authority (CCA) at those ports or a warehouse at those ports, samples could be randomly selected, identified, and sealed from select products (e.g. Boneless Beef) in the container and sent from the foreign port to the United States. This not only benefits national security but also FSIS’ mandate related to food defense, work measurements and staffing.

## Proposal

- Work with CBP and foreign governments at one of the CSI ports to develop pre-selection of sample program. Simplify the sample selection process by using 1 or 2 basic products (e.g. Boneless Beef – 15 samples or Cooked Hams greater than 20 lbs. – 3 or 6 samples).
- The selected samples are marked and sealed in the container.
- Upon arrival at the import establishment the inspector may or may not use the samples based on the type of examination (e.g. normal versus intensified).
- Maintain and analyze data on the pilot and if evidence supports, scale up the pilot.
- Use Health Certificates as the control document to not only certify shipments but with additional information fields that tie the certificates to products with pre-selected samples.

## USDA-FSIS Actions at Import Establishment

- Verify seal and inspection of document copies;
- Stage lot in the approved staging area of import establishment; and
- Use CCA CSI certified pulled samples for examinations at the normal level of inspection only. (Can over-ride assignment in PHIS and select their (USDA-FSIS) own samples at any time to conduct verification if samples are insufficient, unwholesome, or other issues are identified).

## Program Advantages

- Significantly Reduces Destructive Sampling.
- Designated sampling can be verified through the Self Reporting Tool (SRT) equivalence determinations and on-site audits.
- Can have reliable, auditable controls put in place –foreign or domestic controls for product monitoring.
- Still allows for USDA-FSIS to have the option to select samples randomly when appropriate.

## Review of Findings

- Collection of data and review finding determination.
- Expand pilot if evidence supports this.

### **6. Border Testing of Meat Imported from Canada – FSIS Notice 17-14**

The Food Safety and Inspection Service (FSIS or the agency) issued Notice 17-14, *Return of Imported Shipments to Canada Subject to Test and Hold Pending Receipt of Laboratory Results* (attached). We understand that this notice reflects an agreement reached with the Canadian Food Inspection Agency (CFIA) following revisions to the FSIS test and hold policy introduced in February 2013.

The FSIS policy of routinely testing imported loads of Canadian meat for pathogens, residues, and species at the border wastes limited FSIS resources and disrupts trade in an integrated North

American meat and livestock industry. Canadian meat hygiene and inspection standards are equivalent to U.S. standards, all shipments of meat exported from Canada are manufactured in USDA-approved establishments and each load is subject to CFIA inspection and health certification in accordance with FSIS requirements.<sup>1</sup>

We also believe that microbial and residue testing of meat products at the border should be eliminated, and if validation is necessary, this is performed at the originating establishment that produces the product rather than at the border. Microbial testing results in significant delays to shipments; depending on the nature of the product, this significantly decrease its shelf life and hence its value. The current border testing regime for Canadian products entering the United States has resulted in many companies choosing not to export certain products, such as ground beef, because the potential costs related to shipment delays are too great. This barrier to trade must be addressed.

The agency's application of Notice 17-14 is problematic when loads of fresh meat are re-inspected and sampled at the inspection house on the U.S. side of the border. When the current test and hold policy was discussed with industry stakeholders last year, it was made clear that products sampled at the border could continue to their U.S. destination "under control" pending receipt of negative test results. What was never discussed or explained is that FSIS would also require CFIA to hold loads returned to Canada pending receipt of negative test results. The practical result of this new requirement is that loads of fresh meat returned to Canada are now being compromised, resulting in significant financial losses not only to Canadian meat exporters but also to U.S. businesses that rely on such products for further processing.

The problem arises because a load of fresh, chilled meat intended for further processing must be used in just a few days before its quality begins to deteriorate. Typically, results from FSIS border sampling are not known for 5-6 days (particularly if the load is sampled immediately before a weekend and much longer if species or residue testing is assigned). This extended time inevitably makes the product unacceptable to the U.S. processor. In that circumstance, the Canadian supplier prefers to return the load to Canada for immediate processing (*e.g.* pork bellies into bacon) to minimize the losses on the shipment selected for sampling. Notice 17-14, however, now also requires CFIA to keep the load on hold pending the test results, forcing the Canadian company to freeze it and resulting in even greater financial losses.

NAMI and CMC respectfully request that FSIS work with CFIA such that loads returned to Canada are allowed to go straight to further processing with an appropriate policy overseen by CFIA that ensures lot control and no-re-export of finished meat products to the U.S., at least pending receipt of negative test results. Such an approach meets the objective of food safety risk management while minimizing commercial impacts. In addition, species testing should be discontinued in shipments involving primal, bone-in cuts of meat where visual inspection can easily confirm the species.

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<sup>1</sup> U.S. meat products entering Canada may be tested at the receiving establishment but never at the border. We look forward to the long promised "*Pre-Clearance Pilot Project on Import Re-inspection Activities for Fresh Meat*" under the Beyond the Border Action Plan as a means to demonstrate the futility of border testing.

We look forward to FSIS reinstating the “streamlined” import inspection procedures for Canadian product (Docket No. FSIS-2009-0022). CFIA/FSIS should implement a system to improve information sharing in real time.

## **7. Pilot Project to Facilitate Export of US Live Hogs for Slaughter in Canada**

Canada’s hog slaughter industry currently processes only live Canadian hogs. An animal health risk assessment was completed in 2010 on the importation of live U.S. hogs for slaughter in Canada by the CFIA. We understand there remains some concern with the level of surveillance, detection, and control of pseudorabies, swine brucellosis, and more recently PEDv and Seneca virus in the U.S. commercial and wild swine populations. The rules for importing hogs for immediate slaughter into Canada should be risk-based with a view to making them comparable to the rules for Canadian hogs exported to the U.S. for immediate slaughter. Some of the extra costs involved for the Canadian importer include having a veterinarian visit the farm in the USA, additional segregation costs, and additional cleaning of trucks. Such a change would also be advantageous to U.S. hog producers by expanding their potential markets.

To that end, CFIA should work with the USDA to facilitate export of live hogs to Canada, while ensuring that the animals, and the trucks that transport them are free of disease. A pilot project eliminating the extra costs incurred by Canadian importers should be initiated in areas where the risk of porcine epidemic virus (PED), Seneca virus, pseudorabies, brucellosis, and other diseases of zoonotic concern is considered low.

The bilateral convergence of export certification requirements would benefit both the Canadian and United States governments by allowing a more efficient allocation of inspection resources. The current work happening at the RCC on improving and updating export libraries is appreciated, and continued work on this with industry collaboration will continue to benefit the meat and poultry industry on both sides of the border.

## **8. Implementation of Complementary Electronic Export Certification Programs**

The USDA is implementing an electronic document system under the title of the “Public Health Information System Export Module” (PHIS). Given the number of documents and the paperwork required to track and verify more than \$16 billion annually in meat, poultry, and livestock trade between the three NAFTA countries, implementing a complementary system for each country will save time, money, minimize redundancy and clerical errors, and decrease the risk of fraud in shipping these products.

From the FSIS website: “PHIS will streamline the export program by converting what is now solely a paper-based system to an automated one. The automated system covers all functions of the system, including establishment applications for approval for export, applications for export certificates and the issuance of export certificates. The system will enable an automated edit-check capability to ensure that certificates properly reflect a foreign country's import requirements.

The import module allows FSIS to systematically verify the effectiveness of foreign food safety

systems. It also enables the advance receipt and verification of electronic foreign health certificates associated with arriving foreign shipments certified by a foreign government. Processes for auditing inspection programs of foreign countries exporting meat, poultry and processed egg products to the United States will also be automated.”

The Canadian Food Inspection Agency has been developing an electronic export certificate program in Canada for many years. It is time that CFIA prioritizes this program and ensures that it receives the necessary funding. Significantly, this program must complement USDA’s Public Health Information System to simplify trade between the two countries. Can a FSIS-CFIA common meat certificate be developed to expedite the shipment?

## **9. Convergence of Food Safety Technology Approvals**

CMC and NAMI believe that both the Canadian and United States industries would benefit from a converged system for approvals of food safety technologies, including antimicrobial interventions and pathogen testing methods. In Canada all packaging materials, sanitation and maintenance chemicals, and antimicrobial treatments must be approved by CFIA and/or Health Canada before they are used in a meat processing establishment. In many cases these items originate from U.S. companies and are permitted to be used in the US based on thorough scientific evaluation and international standards. The process of obtaining additional approvals (by Health Canada and CFIA) in Canada can be time consuming and complex. Converging approval processes would reduce redundant paperwork and, in some cases, would make available key antimicrobial interventions, chemicals and equipment earlier, with direct benefit in terms of public health protection and meat quality. As a practical matter, although Canada does not always permit the use of food safety interventions or packaging utilized in the U.S., there is no prohibition of their use for meat products exported to Canada from the U.S. Accordingly, there is a compelling rationale to converge these approval processes.

In addition, pathogen tests currently used in Canada are limited to testing methods validated and approved by Health Canada or CFIA. This limits the range of tests available to meat facilities, as the long and complex approval process means the most rapid methods are often unavailable to the industry. As with the other technologies discussed in the paragraph above, U.S. meat products can be exported to Canada even though testing was done using methods not approved in Canada. Canadian food processors need access to the best testing methods available, to continue to secure the safety of consumers and to extend product shelf life.

In short, the Canadian system should be converged with the U.S. system. This process could be initiated on the basis of a pilot project, drawing on experience in other convergence programs, such as the U.S. Canada bilateral program for pesticide approvals.

## **10. Policy Covering Re-boxing of Product in Protective Coverings at ID Warehouses**

Based on the Meat Institute’s understanding of current FSIS policy, product originating in Mexico, re-inspected and passed at an import establishment in the US, can move to an ID warehouse and be re-boxed under voluntary inspection without further processing or exposing the product to the environment. In such a scenario, the product could be re-boxed in containers

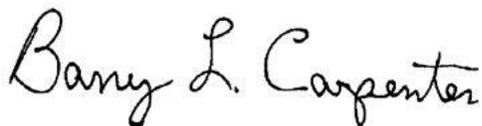
bearing the USDA mark of inspection of the ID Warehouse. The Meat Institute also understands that re-boxing without exposing or further processing the product in protective coverings and then marking the product with the establishment number of the re-boxing facility would not be allowed at an Official Establishment, per current interpretation of FSIS Policy Memo 90B.

9 CFR 350.3(a) reads, *“Identification service. (1) Meat or other product that is federally inspected and passed at an official establishment, or upon importation, under the meat inspection laws, is officially marked to identify it as federally inspected and passed. In order to facilitate the division of such meat or other product into smaller portions or its combination into larger units and still maintain its identity as product which has been federally inspected and passed and so marked, inspectors may supervise the handling of the product and mark such portions or units with the marks of Federal inspection when they determine that the identity has been maintained.”*

FSIS Directive 12,600.1, revision 1, amendment 2, dated 7/2/07, further clarifies that in addition to the division into smaller units or combination into larger units, product may be repackaged without being further processed at an ID Warehouse under voluntary (fee for service) inspection. The specific language in the directive reads, *“ID Service is provided to ensure that the identity of federally-inspected and passed meat and poultry product is maintained throughout the division of such meat and poultry product into smaller portions, its combination into larger units, or its repackaging and relabeling. Product units and portions are officially marked to identify them as inspected and passed.”*

The Meat Institute and CMC wishes to confirm that our understanding of the current policy and its implementation as outlined above, is acceptable to the Government of Canada and that products could be imported into Canada.

Sincerely,



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Barry L. Carpenter  
President and CEO  
North American Meat Institute



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Chris White  
President and CEO  
Canadian Meat Council