

## Verification Procedures for the Import of Canadian Sheep into the United States

Use the following scenario to learn about the verification procedures for the import of Canadian sheep into the United States.

Try to answer each question prior to viewing the answers. The scenario is for your benefit so that you may review the material. *You will not be scored.*

XYZ Establishment is a small sheep kill plant in Lamb City, Nebraska. XYZ has determined they would like to import sheep from Canada for slaughter.

Historically, this XYZ establishment management has occasionally challenged inspection program personnel's authority to oversee some of its activities. However, the plant staff are competent and dependable.

Because XYZ is a small establishment, it has limited pen space, and currently kills about 500 head a day, but only operates 4 days a week. You are relatively new to this plant and are more familiar with cattle kill operations.

You hold your plant awareness meeting and document the meeting in a memorandum of interview. After the meeting you receive a letter from the management with a list of questions and a request for some clarifications. You plan a second awareness meeting to discuss their questions and concerns, but you must prepare first. Read their letter ....

Dear FSIS:

Could you please provide us with clarification and additional information about the following issues:

1. Where does FSIS get its authority to implement this APHIS regulation?
2. How do we get our plant approved by APHIS?
3. What do we do if a load of Canadian animals arrives when you are not around?
4. What will happen if the Canadian sheep do not have official ear tags or "C" brands?
5. We have heard rumors about controlling SRMs, but we did not talk about them in the meeting. What are SRMs and what do we have to do?
6. What age of Canadian sheep can be slaughtered in the United States?
7. Are there special procedures that must be followed with a Canadian carcass if it is condemned for routine purposes during post-mortem?
8. Do you know how to determine the age of sheep?
9. Why do we have to reassess our Food Safety System when we have been killing sheep all along?

Best Regards, XYZ Sheep Plant

**The plant had several questions and concerns. You schedule another meeting with the plant for this afternoon.**

**Now you must prepare your responses for each of these questions. It will give you an opportunity to address a few other issues!**

**Where does FSIS get its authority to implement this APHIS regulation?**

FSIS gets its authority to implement this APHIS regulation from the Animal Health Protection Act (AHPA) through an agreement of understanding with APHIS-VS.

FSIS is utilizing the delegated APHIS authority to implement a hold on animals and/or animal parts to assist in enforcing the APHIS final rule Bovine Spongiform Encephalopathy: Minimal-Risk Regions and Importation of Commodities (70 FR 460 – 553). This final rule amends APHIS regulations 9 CFR parts 93-96.

**How do we get our plant approved by APHIS?**

Refer the establishment to the APHIS area veterinarian-in-charge (AVIC) for additional information and share with them the APHIS Web link regarding approved establishments at: [www.aphis.usda.gov/VIS/NCIE](http://www.aphis.usda.gov/VIS/NCIE).

**What do we do if a load of Canadian animals arrives when you are not around?**

Although not required, FSIS recommends that establishments receiving Canadian imports for slaughter implement procedures that ensure that trucks carrying the animals arrive at the establishment when an authorized USDA representative is readily available to promptly break the seals on the truck.

Only an authorized USDA representative can break the seal

If an authorized USDA representative is not available when a load of Canadian animals arrives, then the plant can contact the inspector-in-charge (IIC).

Remind the plant that when a program employee is called back into duty after hours, during a weekend, or on holidays that the plant will be billed for a minimum of 2 hours overtime or holiday inspection service at the established rate.

**What will happen if the Canadian sheep do not have official ear tags or “C” brands?**

Since this plant will only be receiving sheep from Canada for immediate slaughter, these animals are not required to bear “C” brands.

However, animals that do not bear a CFIA ear tag will be considered ineligible for slaughter. These animals will be separated from the group and held in a pen or area and their movement restricted under a “U.S. Retained” tag, and APHIS will be contacted.

### **What does “immediate slaughter” mean?**

“Immediate slaughter” means that animals that come directly from Canada for slaughter must be slaughtered or euthanized within two weeks of entry into the United States. Animals cannot leave the official establishment premises during this time.

### **We have heard rumors about controlling SRMs, but we did not talk about them in the meeting. What are SRMs and what do we have to do?**

SRM stands for specified risk materials. These are parts of the animal that have been determined to expose humans to materials that scientific studies have demonstrated as containing the BSE agent in cattle infected with the disease.

There are no SRM requirements for sheep and goats. However, an establishment receiving sheep and goats from Canada is to reassess its Food Safety System.

### **What age of Canadian sheep can be slaughtered in the United States?**

Only sheep and goats that are younger than 12 months of age are eligible for importation into the United States from Canada and are eligible for slaughter.

The plant is responsible for ensuring that sheep and goats presented for slaughter are younger than 12 months of age.

### **Are there special procedures that must be followed with a Canadian carcass if it is condemned for routine purposes during post-mortem?**

If the animal has passed ante-mortem inspection and is otherwise eligible for slaughter, but is then condemned during post-mortem inspection, then the carcasses will be handled as any other domestic carcass.

### **Do you know how to determine the age of sheep?**

The age of sheep can be determined through dentition, similar to cattle. When a small ruminant (sheep and goats) is 12 months of age, their permanent middle incisors erupt, so any animal that has one erupted permanent middle incisor is considered to be 12 months of age.

Remember: Sheep older than 12 months of age are considered ineligible for slaughter.

NOTE: The Canadian government is responsible for ensuring animals crossing the border are the correct age and bear correct identification. This will be reflected in the documentation that accompanies these animals. This documentation is also verified at the port of entry.

Inspection program personnel should consider these records, when valid, to be accurate and reliable, although not fail proof. Documentation of age should supersede dentition when such records are available.

### **Why do we have to reassess our Food Safety System when we have been killing sheep all along?**

In accordance with the FSIS regulation 9 CFR 417.4(a)(3), an establishment must reassess its Food Safety System whenever there is a change in raw materials or in the source of raw materials, as would be the case here.

**"But Doc!"**

### **As your meeting is coming to a close, individuals ask a couple more questions...**

What will happen to a carcass if during post-mortem inspection an inspector determines that an animal should have been ineligible for slaughter based on age?

What actions are inspection program personnel going to take if we have an ineligible animal, based on age, that has been slaughtered?

### **What will happen if during post-mortem inspection an inspector determines that an animal should have been ineligible for slaughter based on age?**

The PHV is going to institute a "hold action" under the authority of the AHPA. He or she will apply a "U.S. Retained" tag to the carcass and parts, and the carcass and parts will not be considered eligible for human food.

The XYZ establishment, under its compliance agreement with APHIS as an approved establishment to receive Canadian animals, should discuss with the APHIS AVIC whether any specific disposal requirements are required under the AHPA.

Inspection program personnel are going to verify that the appropriate disposal was made by the establishment.

### **What actions are inspection program personnel going to take if we have an ineligible animal, based on age, that has been slaughtered?**

The establishment should have a written program (HACCP, SSOP, or prerequisite procedures) that ensures only animals eligible for slaughter are presented for ante-mortem inspection.

If an animal that is ineligible for slaughter is slaughtered, this is considered to be a noncompliance issue and will be documented on a Noncompliance Record (NR) as a failure of the establishment to follow their written program.

You will write an NR. The Animal Health Protection Act (AHPA) should be referenced in the NR.

Since the animal is ineligible for import and slaughter in the United States because of its age, the animal is going to be destroyed under the AHPA. It is not condemned under the Federal Meat Inspection Act. Condemnation refers to an adulteration determination under the FMIA.

Meeting adjourned!

Since the XYZ management does not have any more questions at this time, you can adjourn the meeting.

Remember to document in a memorandum of the interview who was present at the second awareness meeting, the date and time of the meeting, what was discussed, and any documents that were shared with management. Also, remember to maintain a copy of the memo in the official government file and provide a copy to the plant management.

Congratulations! You have completed the sheep slaughter plant scenario.