ANIMAL HEALTH IMPORT REQUIREMENTS: PET FOOD

AHPD-DSAE-IE-2001-9-7

PURPOSE

The purpose of this Policy is to provide information and direction to Canadian importers and foreign exporters of pet foods, treats, and chews. Specifically, this document includes the definitions that are used to describe pet products, import conditions, and the documentation that is required to permit the entry of such products into Canada.

The Pet Food Policy is also a document that is used by Canadian Food Inspection Agency (CFIA) Import Specialists, in conjunction with the Automated Import Reference System (AIRS) and other internal documentation, to determine the eligibility and conditions for the import of commodities into Canada.

COMMODITY CHARACTERISTICS

- commercially prepared pet foods (wet and dry
- treats
- rawhide
- compound chews
- dried pig/cattle ears, snouts
- bones as chews (small to large)
- cow hooves (stuffed or natural)
- bull pizzles, trachea, weasand
- other body parts
- pet supplements, oil (fish, salmon)
- other pet foods (bird, ornamental fish, rabbit, ferret, and other small mammals, reptile, lizard, etc.)

DEFINITIONS

Bovine animal: includes, for the purpose of this policy, cattle, buffalo, and bison. Taxonomically, they are classified as members of the subfamily bovinae from the genus *bos*, which includes cattle (*bos taurus* and *bos indicus*) and bison (*Bos bison*).

Bovine spongiform encephalopathy (BSE), also known as "mad cow disease": a progressive, fatal disease of the nervous system of cattle. It is what is known as a transmissible spongiform encephalopathy (TSE). Other TSEs include scrapie in sheep, chronic wasting disease in deer and elk, and Creutzfeldt-Jakob disease http://www.phac-aspc.gc.ca/cjd-mcj/index-eng.php in humans. The disease is associated with the presence of an abnormal protein called a "prion." There is no treatment or vaccine currently available for the disease.



BSE negligible-risk countries or regions: countries or regions that have been recognized by the CFIA to be of negligible risk for BSE. The countries currently classified as such by the World Organisation for Animal Health (OIE) and recognized by the CFIA are Argentina, Australia, Chile, Finland, Iceland, New Zealand, Norway, Paraguay, Singapore, Sweden, and Uruguay.

CBSA: the Canada Border Services Agency

CFIA-AIRS: automated import reference system of the CFIA – a searchable database of import requirements for most food and feed products. The **AIRS**_is accessible via the CFIA website using the following link: http://www.inspection.gc.ca/english/imp/airse.shtml

CFIA import permit: a document issued by the Minister under section 160 of the Health of Animals Regulations for the purpose of importing animals or things.

Compound chews: chews, including rawhide, with edible fillings. The edible filling ingredients may contain ground rawhide, corn syrup, poultry or other animal meals, water, sugar, cheese, peanut butter, oils, fats, starches, and flavours. In some cases, the exterior "casing" consisting of rawhide (which may be comminuted or not) may be wrapped around a food ingredient, such as meat and dried chicken tenders or breast.

Exempted ingredients in pet food: ingredients that do not present a risk with respect to BSE and include the following: milk, milk derivatives, tallow (less than 0.15 percent impurities by weight), and gelatine from hides and skins

Nonruminant: animals of the following species: avian (chicken, turkey), porcine (pigs), and others

Pet: a domesticated animal usually kept in a residence as a companion and generally refers to dogs and cats; can also be referred to as a companion animal

The definition of "pet" may also apply to the following animals:

- small mammals (e.g. guinea pigs, rabbits, mice, hamsters, gerbils, rats, and hedgehogs)
- larger mammals (e.g. skunks and ferrets)
- birds (e.g. budgerigar, canary, and parrot)
- fish (ornamental)
- reptiles (snakes, lizards)

Pet chews: untanned products for pet animals to chew. They have no nutritional value and may contain flavourings, colorants, and preservatives. They are prepared from various animal parts, such as bones, tendons, ligaments, trachea (cartilage), shanks, feet, hooves, horns, ears, snouts, offal, tails, penises (pizzles), and skins.

Pet food: commercially prepared and processed food intended for animals not defined as livestock under the *Health of Animals Act* and *Regulations* that contains the necessary nutrients, vitamins, and minerals to maintain the life and growth of the animal.

Pet food may be dry, semi-moist, or moist, and can be made from meat, organs, and/or animal by-products from cattle, poultry, pork, lamb, or fish.

Pet supplement: a processed nutritional product whose purpose is to provide additional protein, vitamins, minerals, or other products, such as chondroitin sulphate or glucosamine, to pet animals. Supplements may be in pill, capsule, powder, or liquid form, and either added to food or given directly (orally) to the animal.

Pet treat: a pet food, with limited nutritional value, either baked, extruded, or injection moulded. It is usually made with flour, starch, fibres from fruit or cereal product, mixed with greaves, meat, or meat meal. The treat may be semi-moist or dried and is used as a training aid or reward.

Processed pet food: pet food, other than raw pet food, that has undergone a heat treatment

Raw diet: sometimes referred to as bones and raw food (BARF) diet – a combination of fresh ingredients consisting of chunks or ground raw meat, raw bones, vegetables, and fruits. These foods are intended to be fed to animals in their raw (uncooked) state.

Rawhide: a material obtained by separating an animal hide over its whole area into two or more layers (splitting the hide). The bottom split is then processed by a means similar to parchment dressing, in which the hide is converted to a form of hardened and dried product without the process of tanning. It has no nutritional value and may contain flavourings and colourants.

Ruminant: animals of the suborder ruminate, which regroups the following species: bovine (cattle, bison, buffalo); ovine (sheep); caprine (goat); and cervid (deer, elk); and others.

Specified risk material (SRM): the skull, brain, trigeminal ganglia, eyes, tonsils, spinal cord, and dorsal root ganglia of cattle aged 30 months or older, and the distal ileum of cattle of all ages.

Zoosanitary veterinary certificate: a certificate issued by a veterinary competent authority, certifying specific requirements usually contained as part of an import permit's terms and conditions

DISEASES OF CONCERN

For the purposes of this directive, all pet foods imported into Canada must meet the following requirements that relate to the diseases of concern for each species from which the product is derived:

1. Pet food containing ingredients of ruminant (bovine, ovine, caprine, or cervid) origin:

The exporting country must be free of foot-and mouth disease (FMD) and considered of negligible risk for BSE.

2. Pet food containing ingredients of porcine origin:

The exporting country must be free of FMD, swine vesicular disease (SVD), African swine fever (ASF), classical swine fever (CSF – hog cholera).

3. Pet food containing ingredients of avian origin:

The exporting country must be free from Velogenic Newcastle disease (VND) and pathogenic avian influenza (fowl plague/highly pathogenic avian influenza [HPAI]).

IMPORT CONDITIONS AND PROCEDURES

1. Commercially prepared pet food, in cans or retortable pouches, and pet treats

Commercially prepared and processed pet food, pet treats, and compound/stuffed pet chews containing animal by-products (e.g. meat, fish, organ meats, bone meal, meat meal, blood meal, fish meal, rendered animal fats, gluestock):

United States:

i) Pet food containing non-bovinae ingredients from the United States (U.S.) (i.e. poultry, fish, pork)

Import permit – required to import the pet food. An import permit will be issued by Headquarters, only after the successful completion of a risk assessment. The attached Facility Questionnaire: Importation of Pet Foods/Treats/Compound Chews from the U.S. Containing Only Non-Bovinae Animal Ingredients (Annex 2) must be completed and submitted with the import permit application.

Once the permit is approved, the following documents must accompany each shipment:

- Import permit
- Importer Statement of Compliance
 Each non-bovinae shipment must be accompanied by the *Importer Statement of Compliance* (Annex 5), using the importer's letterhead, signed, dated, and linked to the shipment.
- Canada Customs Invoice (CCI), or a commercial invoice
 The CCI must link to the shipment and clearly describe the product(s) being imported, indicating the country of origin and end use.

ii) Pet food containing bovinae ingredients from the U.S. (cattle, bison, buffalo, and exotics)

Import permit – required to import the pet food. An import permit will be issued only after successfully completing a risk assessment and facility inspection. The attached bovinae *Pet Food Facility Questionnaire* (Annex 3) and the United States Department of Agriculture (USDA)-Certified *Pet Food Facility Inspection Checklist for Canada* (Annex 4) must be completed, signed, stamped, and submitted by the importer with the import permit application.

Once the permit is approved, the following documents must accompany each shipment:

- Import permit
- Zoosanitary Export Certificate

Each shipment must be accompanied by an ORIGINAL export Health Certificate, endorsed by a full-time, salaried veterinarian of the USDA- Animal and Plant Health Inspection Service (APHIS) attesting the following:

The pet food, pet treat, or compound chew products were manufactured with U.S.-origin bovinae ingredients that do not contain any of the following tissues considered to be SRM: the skull, brain, eyes, tonsils, trigeminal ganglia, spinal cord, or dorsal root ganglia from bovinae animals aged 30 months or older and the distal ileum from bovinae of all ages;

Or

Certified bovinae material that originated from a country recognized by the CFIA as negligible risk for BSE (Argentina, Australia, Chile, Finland, Iceland, New Zealand, Norway, Paraguay, Singapore, Sweden, and Uruguay);

Or

Bovinae ingredients originated in Canada;

And

The certified pet food/treats/compound chews were manufactured in either

A dedicated facility that does not receive, process, or store any bovinae SRM or bovinae ingredients that contain SRM (the skull, brain, eyes, tonsils, trigeminal ganglia, spinal cord, dorsal root ganglia from bovinae animals aged 30 months or older and the distal ileum from bovinae of all ages);

Or

On a dedicated line from receipt of raw material to final packaging and storage with no risk of cross-contamination with any bovinae SRM-derived tissues. (NOTE: If the facility has ineligible materials on the premises, all pet foods for export to Canada must be produced on a totally dedicated line);

And

The pet food products, subject of this shipment, were sufficiently processed to assure the destruction of microbiological pathogens;

And

Precautions have been taken to avoid recontamination of the product with pathogenic agents after heat treatment.

CCI or a commercial invoice
 The CCI must be linked to the shipment and must clearly describe the product being imported, and indicate the country of origin and end use.

From countries recognized to be of negligible BSE risk by the CFIA:

Zoosanitary Export Certificate

Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin, clearly describing the product and a copy of the list of ingredients.

CCI or a commercial invoice

The CCI must clearly describe that it is a commercially cooked sterile product in cans or retortable pouches.

From countries not recognized to be of negligible BSE risk by the CFIA:

The importation is subject to a case-by-case evaluation by Headquarters;

An import permit will be issued only after the successful completion of a risk assessment. The attached questionnaire, *Importation of Commercially Prepared Pet Food from Countries of Controlled or Undetermined BSE Risk* (Annex 1), must be completed and submitted with the import permit application.

A visit to the exporting country may be required to collect additional information relevant to the evaluation and/or to verify the information provided.

No permits will be issued in cases wherein the exporting/processing pet food facility and/or any of their suppliers that receive, store, or process bovine material and/or rendered ruminant material from countries not recognized to be of negligible BSE risk by the CFIA. The only countries that are currently recognized to be of negligible BSE risk by the CFIA are Argentina, Australia, Chile, Finland, Iceland, New Zealand, Norway, Paraguay, Singapore, Sweden, and Uruguay.

2. Commercially prepared dry pet food and pet treats, in bulk or final packaging

United States:

The import conditions shown in section 1, subparagraphs

- i) pet food containing non-bovinae ingredients and
- ii) pet food containing bovinae ingredients shall apply to the import of dry pet food and treats.

The same documentation requirements shall also be required.

NOTE: United States. facilities that produce dry bovinae-based pet foods for their domestic market, but do not ship bovinae products to Canada, will be permitted to export to Canada non-bovinae products that were produced on the same production line, subject to implementing an approved clean-out procedure prior to the production of non-bovinae pet foods destined to Canada. Separation protocols must also be maintained. The procedures and protocols must comply with the *FDA Guidance for Industry 68: Small Entities Compliance Guide for Protein Blenders, Feed Manufacturers, and Distributors*, and be part of the firm's Standard Operating Procedures (SOPs), a copy of which must accompany the Facility Questionnaire for non-bovinae imports to Canada.

From countries recognized to be of negligible BSE risk by the CFIA:

- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL export certificate endorsed by a full-time, salaried veterinarian of the country of origin, stating that the country of origin is free of BSE and diseases of concern (described under "Definitions");
- CCI clearly describing the product; and
- List of ingredients

From countries not free of diseases of concern but recognized to be of negligible BSE risk by the CFIA:

- Import permit
- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin, attesting to acceptable processing as determined by CFIA Headquarters on a caseby-case basis, and listed in the conditions of the import permit.

From countries that are not recognized to be of negligible BSE risk by the CFIA:

- The importation is subject to a case-by-case evaluation.
- An import permit will be issued only after the successful completion of a risk assessment.
 The attached questionnaire (Annex 1) must be completed and submitted with the import permit application.
- A visit to the exporting country may be required to collect additional information and/or to verify the information provided.

 No permits will be issued in cases wherein the exporting/processing pet food facility and/or any of its suppliers receive, store, or process bovine material and/or rendered ruminant material from countries not recognized to be of negligible BSE risk by the CFIA. The only countries that are currently recognized to be of negligible BSE risk by the CFIA are Argentina, Australia, Chile, Finland, Iceland, Norway, New Zealand, Paraguay, Singapore, Sweden, and Uruguay.

3. Pet chews

The processing of pet chews (made from body parts of slaughtered animals) generally follows one of three methods of drying and heat treatment, based on either size and/or weight. Table 1, to be used for information only, provides a sample of various types of chews and their categories. The CFIA headquarters will make the final determination on which process should apply to the list of products' object of an import permit application.

TABLE 1 Various chew types and categories (sample)

Small/light	Medium	Large/heavy
ribs	knuckles	femur
ears	femur head	humerus
snouts	pizzles/weasand	tibia
rawhide/rawhide chip	cow hoof	
During a total processing	During a total processing	During a total processing
time of 17 hours, the	time of 73 hours, the	time of 110 hours, the
product must reach a	product must reach a	product must reach a
minimum 85°C for 5	minimum 85°C for 5	minimum 85°C for 48
hours	hours	hours

Rawhide (see definition)

During a total processing time of 17 hours, the product must reach a minimum temperature of 85°C for 5 hours.

Rawhide can be coated with natural flavour, but must be

- dried, single piece or comminuted
- in final packaging or bulk
- if basted, must be in dry form

Rawhide is not a risk product for BSE; hence, certification of time and temperature will not be required for entry into Canada.

Shipments may be subject to inspection at the first point of entry or at a destination by an inspector designated under the *Health of Animals Act*.

9

From any country:

• **CCI** – linked to the shipment and proof of origin acceptable to the CBSA, specifying that the product is dried and contains no other animal product or by-product.

Dried Pig/Cattle Ears

United States:

During a total processing time of 17 hours, the product must reach a minimum temperature of 85°C for 5 hours.

- **CCI** linked to the shipment being imported, stating the origin of the product
- **Importer Statement of Compliance** on Importer's letterhead stating in addition to the statements shown on the template, that
 - 1. the finished product is dried and contains no other animal product or by-product; and
 - 2. the product has reached the minimum processing time and temperature stated above.

From countries recognized as free of diseases of concern by the CFIA:

- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin, attesting that
 - 1. the product is dried and contains no other animal product or by-product;
 - 2. the country is free of the disease of concern related to the species of animal used in the production of the chew; and
 - during the total processing time of 17 hours, the product reached a minimum of 85°C for 5 hours.

From countries not recognized as free of diseases of concern by the CFIA:

- Import permit issued only after the successful completion of a risk assessment. The attached questionnaire (Annex 1) must be completed and submitted with the import permit application. A visit to the exporting country may be required to collect additional information and/or to verify the information provided. No permits will be issued in cases wherein the exporting/processing pet food facility and/or any of its suppliers receive, store, or process bovine material and/or rendered ruminant material from countries not recognized to be of negligible BSE risk by the CFIA. The only countries that are currently recognized to be of negligible BSE risk by the CFIA are Argentina, Australia, Chile, Finland, Iceland, Norway, New Zealand, Paraguay, Singapore, Sweden, and Uruguay.
- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin, attesting that the product
 - 1. was subjected to a heat treatment to reach a minimum temperature of 85°C for 5 hours for a total processing time of 17 hours; and

RDIMS#1987883

2. contains no other animal product or by-product.

Any other proposed treatment must be evaluated by Headquarters prior to the importation of the product.

Dried Bull Pizzles and Cow Hooves for Use as Pet Chews

United States:

During the total processing time of 73 hours, the product must reach a minimum temperature of 85°C for 5 hours.

- CCI linked to the shipment being imported, stating the origin of the product
- **Importer Statement of Compliance** on Importer's letterhead stating in addition to the statements contained in the template that
 - 1. the finished product is dried and contains no other animal product or by-product; and
 - 2. the product has reached the minimum processing time and temperature stated above.

From countries recognized as free of diseases of concern by the CFIA:

- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL veterinary export certificate endorsed by a full-time, salaried veterinarian of the country of origin, attesting that
 - 1. the product is dried and contains no other animal product or by-product;
 - 2. the country is free of the disease of concern; and
 - 3. the product has undergone a processing time of 73 hours and has reached a minimum temperature of 85°C minimum for 5 hours.

From countries not recognized as free of diseases of concern by the CFIA:

- Import Permit will be issued only after the successful completion of a risk assessment. The attached questionnaire (Annex 1) must be completed and submitted with the import permit application. A visit to the exporting country may be required to collect additional information and/or to verify the information provided. No permits will be issued in cases wherein the exporting/processing pet food facility and/or any of its suppliers receive, store, or process bovine material and/or rendered ruminant material from countries not recognized to be of negligible BSE risk by the CFIA. The only countries that are currently recognized to be of negligible BSE risk by the CFIA are Argentina, Australia, Chile, Finland, Iceland, Norway, New Zealand, Paraguay, Singapore, Sweden, and Uruguay.
- Zoosanitary Veterinary Certificate Each shipment must be accompanied by an ORIGINAL export certificate endorsed by a full-time, salaried veterinarian of the country of origin, attesting that
 - 1. the product is dried and contains no other animal product or by-product; and
 - 2. the product has undergone a processing time of 73 hours and has reached a minimum temperature of 85°C minimum for 5 hours.

Bones Used as Pet Chews

TABLE 2 From the United States

Small/light ribs	Medium knuckles femur head	Large/heavy femur humerus tibia
During a total processing time of 17 hours, the product must reach 85°C for a minimum of 5 hours	During a total processing time of 73 hours, the product must reach 85°C for a minimum of 5 hours	During a total processing time of 110 hours, the product must reach 85°C for a minimum of 48 hours

- **CCI** linked to the shipment, stating the origin of the product acceptable to the CBSA
- **Importer Statement of Compliance** on Importer's letterhead stating in addition to the statements contained in the template, that
 - 1. the finished product is dried and contains no other animal product or by-product; and
 - 2. the product has reached the minimum processing time and temperature (Table 2) for the type and size of bones.

TABLE 3 From countries recognized as free of diseases of concern by the CFIA

Small/light ribs	Medium knuckles femur head	Large/heavy femur humerus tibia
During a total processing	During a total processing	During a total processing
time of 17 hours, the	time of 73 hours, the	time of 110 hours, the
product must reach a	product must reach a	product must reach a
minimum of 85°C for 5	minimum of 85°C for 5	minimum of 85°C for 48
hours	hours	hours

Zoosanitary Export Certificate – Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin attesting that

1. the product is dried and heat treated and contains no other animal product or by-product.

TABLE 4 From countries not recognized as free of diseases of concern by the CFIA

Small/light ribs	Medium knuckles femur head	Large/heavy femur humerus tibia
During a total processing time of 17 hours, the product must reach 85°C for a minimum of 5 hours	During a total processing time of 73 hours, the product must reach 85°C for a minimum of 5 hours	During a total processing time of 110 hours, the product must reach 85°C for a minimum of 48 hours

Import permit

Zoosanitary Export Certificate – Each shipment must be accompanied by an ORIGINAL export certificate, endorsed by a full-time, salaried veterinarian of the country of origin attesting that

1. the product is dried and heat treated and contains no other animal product or by-product.

4. Pet foods, other than dog and cat food

Examples of these foods would be food for birds (parrots, budgies), ornamental fish, rabbits, ferrets, rodents, reptiles, etc.

For foods in this category, only foods containing animal-origin ingredients are subject to import controls.

For pet foods containing only plant-origin ingredients, see item 7.

From the United States:

The same conditions apply as those pet foods in sections 1 or 2, depending on the case.

From all other countries:

- The importation is subject to a case-by-case evaluation.
- An import permit will be issued only after the successful completion of a risk assessment.
 The attached questionnaire (Annex 1) must be completed and submitted with the import permit application.
- A visit to the exporting country may be required to collect additional information and/or to verify the information provided.
- No permits will be issued in cases wherein the exporting/processing pet food facility and/or
 any of its suppliers receive, store, or process bovine material and/or rendered ruminant
 material from countries not recognized to be of negligible BSE risk by the CFIA. The only
 countries that are currently recognized to be of negligible BSE risk by the CFIA are

Argentina, Australia, Chile, Finland, Iceland, Norway, New Zealand, Paraguay, Singapore, Sweden, and Uruguay.

5. Nutritional supplements (such as vitamins, minerals, etc)

Please refer to the Highly Processed Products Directive AHPD-DSAE-IE 2001-8-3

http://www.inspection.gc.ca/english/anima/heasan/pol/ie-2001-8e.shtml

6. Raw Diets (BARF), frozen or refrigerated

These diets present a risk with respect to microbial contamination and a potential risk regarding transmission of diseases of concern due to lack of a thermal treatment. They can also present a risk to human health if proper precautions are not taken by persons who handle these products (i.e. hand washing, cleaning of surfaces used in the preparation of such diets, and awareness of young children around the pet's food bowl).

From the United States:

- **Import permit** case-by-case assessment. The attached questionnaire (Annex 1) must be completed and submitted with the import permit application.
- Zoosanitary Export Certificate Each shipment must be accompanied by an ORIGINAL
 export certificate, endorsed by a full-time, salaried veterinarian of the country of origin
 attesting that
 - the meat used in the raw diet came strictly from carcasses or parts of carcasses that have passed ante- and post-mortem inspection and were declared fit for human consumption at slaughter;
 - 2. the raw diet does not contain any SRM, as defined in the definition section of this policy;
- CCI linked to the shipment, stating that the origin of the product is acceptable to the CBSA

From countries of negligible risk for BSE and free of diseases of concern for the species of animal ingredient in the diet:

• **CCI** – linked to the shipment, stating that the origin of the product is acceptable to the CBSA

From all other countries:

Entry Prohibited

7. Pet Food containing no animal-origin ingredients (grains, seeds, other plant-origin ingredients)

When the commercially prepared pet food contains only plant products, or highly processed products that are not of bovine or animal origin, it may be imported if

- the CCI linked to the shipment states that the origin of the product is acceptable to the CBSA; and
- The List of ingredients is referred to a CFIA inspector, and the CFIA inspector is satisfied
 that it does not contain any regulated ingredients. The inspector should verify any
 Animal Health or Plant Health requirements for particular ingredients. If the pet food
 contains egg products as the only regulated ingredient, refer to section 8 for the applicable
 import requirements.

8. Pet Food containing Egg Products

From the United States:

- CCI linked to the shipment, stating the origin of the product acceptable to the CBSA
- List of ingredients

From countries recognized free of diseases of concern by the CFIA:

- CCI linked to the shipment, stating that the origin of the product is acceptable to the CBSA
- Zoosanitary Veterinary Certificate from the country of origin, stating that the country of origin is free of avian diseases and clearly describing
- List of ingredients

From countries not recognized as free of diseases of concern by the CFIA:

- CCI linked to the shipment, stating that the origin of the product is acceptable to the CBSA
- Zoosanitary Veterinary Certificate signed by an official of the government of the country of origin, stating that the products have been subjected to one of the following treatments:
 - albumen minimum temperature of 54 degrees Centigrade for at least 3.5 minutes;
 - egg yolk or whole egg minimum temperature of 61 degrees Centigrade for at least 3.5 minutes; or
 - Any other equivalent treatment, as determined by CFIA Headquarters.

PET FOOD – TRAVELLER'S EXEMPTION FOR UNITED STATES RESIDENTS

The following provisions apply **only** to United States residents, either travelling in Canada on vacation or transiting through Canada to Alaska, accompanied by their pet(s).

- 1. Only pet food containing non-bovinae-derived ingredients, except for milk and milk products, and tallow (protein free) up to a maximum of 20 kilograms can be imported.
- 2. The pet food must be commercially prepared processed pet food, either wet or dry.
- 3. It must be in its original unopened bag or can, and the label must clearly indicate the list of ingredients.

Countries other than the United States:

• Not permitted – entry prohibited

IMPLEMENTATION

This directive relates to Animal Health import requirements and does not remove any obligation from the Canadian importer to comply with the import requirements of other CFIA programs and/or other departments.

Annex 1

Importation of Commercially Prepared Pet Food from Countries of Controlled or Undetermined BSE Risk

Questionnaire for Risk Assessment

To: Canadian importers applying for an import permit for commercially prepared pet food.

Ref: Import policy AHPD-DSAE-IE-2001-9-7

- 1. Name, list of ingredients, and size of containers for each type of processed pet food that you wish to import into Canada. Please attach a copy of all labels.
- 2. What is the complete name and address of the foreign facility where your product is processed? (Please include the government-approval number of the facility.)
- 3. What kind (name) of material of animal origin is processed and/or stored in the facility?
- 4. What is the species of origin of the material of animal origin that is processed and/or stored in the facility?
 - a. Who (name, address, and government-approval number) supplies this material? If they receive the raw material from another manufacturer/supplier, what other materials are processed by the other manufacturer/supplier? Please provide copies of all relevant import certifications.
 - b. Does that manufacturer/supplier receive, store, or process any ruminant material on its premises? If yes, what is the country of origin of the ruminant material? How does that manufacturer/supplier ensure that the material does not contain and/or has not been cross-contaminated with the bovine specified risk material (SRM) under Number 18?
- 5. Does the facility process or store any of the following materials:
 - a. processed animal proteins (e.g. meat and bone meal, meat meal, bone meal, blood meal, dried plasma and other blood products, hydrolyzed proteins, poultry meal, feather meal, or any similar products)
 - b. offal, tankage, gluestock, fat, tallow, glands, edible or inedible meat.
- 6. If so, what is the species of origin of this material? And if yes, what is the country of origin of the animal product?
- 7. If the facility has discontinued processing or storing this type of material, what date did it stop the processing or storing in the facility?

- 8. What protein source is used in the preparation of the final products?
- 9. What is the species of origin of the protein sources?
- 10. If the protein source was obtained elsewhere, how is it determined that it was not cross-contaminated with bovine SRM from countries not of negligible BSE risk?
- 11. What final products are manufactured in the processing facility?
 - a. Are these products exported or can they be sold domestically?
 - b. Is there a difference between the products used domestically and those exported? If so, what is the difference?
 - c. Please describe the processing treatment that the pet food undergoes in the manufacturing facility.
- 12. Where are the animal products used in the facility?
 - a. Do they have one portion of the facility that is
 - 1) "dedicated" to only using certain animal=origin materials; or
 - 2) cleaning and disinfecting of grinders, mixers, and other equipment is performed between batches of product intended for export to Canada? If so, how is the equipment cleaned and disinfected?
 - b. If the answer is 1), then how does the facility verify that no cross-contamination occurred in this portion of the facility?
 Do they separate by time the use of mammalian protein vs. non-mammalian proteins, or are there other methods of separation?
- 13. How is raw material moved around in the facility?
- 14. Is specific equipment used for certain products? If so, please specify (a facility diagram may be necessary) how the animal-origin raw materials are segregated in the facility.
- 15. Regarding storage and transport to and from the facility:
 - a. Do storage areas differ for the various incoming products; mammalian vs. non-mammalian proteins?
 - b. Are there different storage areas for finished products?

- 16. What is the name of the government competent authority responsible for animal health and the competent regulatory authority that overseas (inspects and approves) the production of your product and can provide government certification?
- 17. Is the prepared pet food that you wish to export to Canada allowed in the U.S.?
 If so please provide a copy of the import permit issued by the United States Department of Agriculture/Animal and Plant Health Inspection Service (USDA-APHIS).

For commercially prepared pet food, please note that the CFIA is concerned, in particular, with certain ruminant-derived products that originate from countries that the CFIA does not recognize to be of negligible BSE risk and the possibility of cross-contamination or commingling. At this time, the only countries that the CFIA recognizes to be of negligible BSE risk are as follows: Argentina, Australia, Chile, Finland, Iceland, New Zealand, Norway, Paraguay, Singapore, Sweden, and Uruguay. Importation of rendered animal proteins containing or prepared using the following bovine SRM, and/or material from any ruminant, from countries that CFIA does not recognize to be of negligible BSE risk is prohibited. Products that may be cross-contaminated or that have been commingled with such animal proteins are prohibited as well.

Specified Risk Material: includes the skull, brain, trigeminal ganglia, eyes, tonsils, spinal cord, and dorsal root ganglia of cattle aged 30 months or older, and the distal ileum of cattle of all ages.

Name and Address of Importer	Name and Address of Exporter
Title of Importer	Title of Exporter
2: (1)	15 1
Signature of Importer	\$ignature of Exporter
Date	Date

ANNEX 2

Facility Questionnaire Importation of Pet Foods/Treats/Compound Chews from the U.S. containing only Non-**Bovinae Animal Ingredients**

This questionnaire must be completed by a manufacturing facility producing the finished Pet Foods mentioned above which does not export pet food products containing bovinae ingredients to Canada

Complete name and address of the facility where the product is produced, processed, 1. packaged, stored, or otherwise handled. (Note: a questionnaire must be completed for each facility.)

Company
Address
City/State/ZipCode
ContactName/Title
Telephone/Fax/Email

The product(s) covered by this questionnaire is/are (delete item(s) not applicable; 2. describe as needed)

Pet Food

- Wet hermetically sealed 1.
- 2. Dry (kibble)
- 3. Soft moist
- Other (please specify)

Pet Treat

- Semi moist (soft) 1.
- Dry (jerky) 2.
- 3. Other (please specify)

Chew

Compound (e.g. rawhide wrapped around dried chicken jerky) – specify animal origin ingredients, other than rawhide

For the purposes of this questionnaire, milk and dairy ingredients; protein-free tallow, and rawhide are not considered bovinae ingredients.

3.	You	r manufacturing facility is a: (check applicable box)
		Dedicated Facility : does not receive, process, or handle any bovinae ingredients, OR
		the bovinae ingredients on the premises are certified "specified risk material (SRM¹) removed." (Note: for the purposes of this questionnaire, dairy, protein-free tallow, and rawhide are not considered bovinae ingredients. In addition, facilities with bovinae ingredients sourced only from a negligible BSE risk country, recognized by the CFIA or from Canada, will be considered dedicated.)
		OR OR
		Dedicated Line: a premises with bovinae ingredients that are not certified as "SRM removed," but has a dedicated line on which it produces non-bovinae product for export to Canada
		OR
		Mixed Facility : produces on the same premises a product that contains bovinae ingredients not certified "SRM removed" for the domestic market and non-bovinae derived products for export to Canada.
4.	and Sma and clea food	ixed facility has a written standard operating procedure (SOP), covering separation clean-out protocols, which implements the <i>FDA Guidance for Industry 68:</i> all Entities Compliance Guide for Protein Blenders, Feed Manufacturers, Distributors and warrants that such a procedure is employed to nout and flush the line(s) prior to the use of the line(s) for the production of any pet , pet treat, compound chew, or pet food ingredients destined for export to Canada. ase attach a copy of your SOP to this questionnaire.)
5.		exported product does not contain any bovinae ingredients, except for milk, milk der, other dairy ingredients, protein-free tallow, or rawhide.
	facili	all animal-origin materials received, stored, processed, or otherwise handled in this ity, list the type of ingredient, species of origin, and country of origin. (If more space seded, include an attachment.) ¹

¹ Permissible materials cannot contain or be prepared from the following specified risk materials: the skull, including the brain, the tonsils, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, and the vertebral column from cattle aged 30 months or older; and the distal ileum of the small intestine from cattle of all ages.

TABLE 1 Animal-origin ingredients

TYPE *(e.g. meat meal, bone meal, meat and bone meal, liver, kidney, heart, meat, tallow, protein free tallow ² , egg, milk, blood, gelatin)	SPECIES OF ORIGIN *(e.g. fish, avian [chicken, turkey]; bovine [cow, bison]; porcine [pig]; ovine [lamb, sheep]; caprine [goat]; equine [horse]; and cervid [deer])	Country of origin
* These are provided as example	es only; your product may include	other animal-origin
	nal-origin materials in your prod	

² Protein-free tallow is defined as tallow with a maximum level of insoluble impurities of 0.15% in weight. Lot-specific laboratory documentation is required.

Signature of Facility Representative	Signature of Canadian Importer
Title of Facility Representative	Title of Canadian Importer
Date	Date

ANNEX 3

Pet Food Facility Questionnaire

This questionnaire must be completed by the facility and endorsed by a full-time, salaried veterinarian of the government agency responsible for animal health in the country where the facility is located.

1.	Complete name and address of the facility where your product is processed, produced, packaged, stored, or otherwise handled. (Note: a questionnaire must be completed for each facility.)

2. For all animal-origin materials received, stored, or processed in this facility, list the type of ingredient, species of origin, and country of origin. (If more space is required, include an attachment.)¹

TABLE 1 Animal-Origin Ingredients

Type

*(e.g. meat meal, bone meal, meat and bone meal, liver, kidney, heart, meat, tallow, protein-free tallow², egg, milk, blood, gelatin)

Species of Origin

*(e.g. fish, avian [chicken, turkey]; bovine [cow, bison]; porcine [pig]; ovine [lamb, sheep]; caprine [goat]; equine [horse]; and cervid [deer])

Country of Origin



^{*} These are provided as examples only, and your product may include other animal-origin materials. Please list <u>ALL</u> animal origin materials in your product.

3.	Comments (add attachment if additional s	space is required):	
Sigr	nature of Facility Representative	Date	
	of Facility Representative		
Sigr	nature of official government veterinarian	Official Seal	
Title	of official government veterinarian	Date	

Notes:

Protein-free tallow is defined as tallow with a maximum level of insoluble impurities of 0.15% in weight. Lot-specific laboratory documentation is required.

Permissible materials cannot contain or be prepared from the following specified risk materials: the skull, including the brain, trigeminal ganglia, eyes, tonsils, spinal cord, dorsal root ganglia, and the vertebral column from cattle aged 30 months or older; and the distal ileum of the small intestine from cattle of all ages.

ANNEX 4

PET FOOD FACILITY INSPECTION CHECKLIST FOR CANADA

-	
	Address (physical location) of facility being inspected:
•	
	Address of headquarters if different from above:
i	If known, permit application reference number(s) or permit number for which this inspection is required and the assigned Staff Veterinarian:
-	Reference number/Permit number ¹ Staff veterinarian
-	
	Facility representative ² accompanying APHIS/VS VMO inspector:
	Name:
	Title:
	Telephone:
	Facsimile:

 $[\]overline{\ ^{1,\,2}}$ The numbered explanations on page 5 correspond with the citations within text.

6.	Yes No Has the facility provided you with a completed copy of the Facility Questionnaire? This is required to complete the inspection. ³		
7 Yes No All ruminant materials received, stored, processed, or oth handled in the facility must be declared on the Facility Questionnaire. Was evidence that the facility receives, stores, processes, or otherwise handles materials not included on the Facility Questionnaire? If yes, please include (if more space is required, include attachment).			
8.	YesNo Are any of the ruminant materials received, stored, processed, or otherwise handled in this facility prohibited for importation into Canada? If "yes," please complete #9. If "no," skip #9, and respond to #10.		
9.	YesNo Are pet foods with ruminant ingredients intended for export to Canada being produced on a dedicated line? ⁵		
10.	When you selected finished products from several different lots:		
	a yes no. Was the facility able to show you records verifying the country of origin of all animal-origin ingredients (except for dairy, hides, and protein-free tallow) ^{6,7} ? If the answer is no, please include details below.		
	b yes no. Were these records consistent with the information provided on the Facility Questionnaire? If the answer is no, please include details below.		

RDIMS#1987883

 $\overline{^{3-7}}$ The numbered explanations on page 5 correspond with the citations within text.

Annex 3 – Pet Food Facility Checklist for Canada Modified: June 9, 2009

yes no. For any imported ruminant materials (excluding dairy, hides, and protein-free tallow) did the facility show you shipping invoices or other documentation to verify the material was imported from the country listed on the Facility Questionnaire? If the answer is no, please include details below.
yes no. Are the products packaged and stored in a manner to prevent possible cross-contamination or commingling?
Comments and any additional explanations (if more space is required, include an attachment):

Signature of APHIS VS Veterinarian	Date	
Printed name of APHIS VS Veterinarian	Official Seal	
Recommendation of CFIA Veterinarian reviewi above:	ng permit application(s) noted in nu	mber 4
Approve	Disapprove	
Initials of Staff Veterinarian	Date	

EXPLANATIONS

- 1. Reference numbers are assigned to permit applications. If the reference number or the permit number (for renewals) is unknown, leave blank.
- 2. The facility representative accompanying the APHIS/VS VMO inspector should be a responsible facility employee who is knowledgeable about the facility's processes and products.
- 3. The Facility Questionnaire can be endorsed at the time of this inspection; however, it must be completed by the facility prior to the inspection.
- 4. Prohibited ruminant materials from Category 2 and 3 countries (i.e. controlled or undetermined BSE risk, respectively) are products or ingredients containing or prepared with any of the following specified risk materials: the skull, including the brain, trigeminal ganglia, eyes, tonsils, spinal cord, dorsal root ganglia, and the vertebral column from cattle aged 30 months or older; and the distal ileum of the small intestine from cattle of all ages.

NOTE: If SRM-free ruminant meat-and-bone meal (MBM) from a Category 2 country (controlled risk) should be included in products for export to Canada, the rendering facility must be dedicated (i.e. does not receive, store, or process **any** SRMs). Verification for SRM-free ruminant MBM may require a special program, such as an AMS verification program.

- 5. Non-dedicated facilities must have a line totally dedicated to the production of pet food with allowable ruminant ingredients (dairy, hides, protein-free tallow, ruminant ingredients from Category 1 countries, SRM-free ruminant ingredients from Category 2 and 3 countries). A dedicated line requires measures to prevent cross-contamination or commingling, including separation of eligible and ineligible materials from receipt of raw ingredients through load-out of finished products.
- 6. Protein-free tallow is defined as tallow with a maximum level of insoluble impurities of 0.15% in weight. Lot-specific laboratory documentation is required.
- 7. Dairy, hides, and protein-free tallow are considered low-risk commodities by the Canadian Food Inspection Agency.

ANNEX 5

Importer letterhead

Importer Statement of Compliance

Date:

TO: Canadian Food Inspection Agency Inspector/Officer

Canada Border Services Agency Inspector

Canadian Food Inspection Agency - Import Service Center Officer

Reference: Shipment #:

Container/Truck/Trailer #:

Seal #:

Product Description: •

Country of Origin of Finished Product:

Section 35(1) of the Health of Animals Act states that:

"35 (1) No person shall obstruct or hinder or make any false or misleading statement either orally or in writing to an analyst, inspector or officer who is performing duties or functions under this Act or the regulations."

Recognizing the above provision of the *Health of Animals Act*, as the importer or a duly authorized officer of the importer, importing finished pet food/treats or compound chews, I state as follows:

Ingredients

 The pet food, treats, or compound chews object of this shipment do not contain any bovinae* (cattle, bison, buffalo or exotic bovinae, such as élan) ingredients (except for milk, milk powder, other dairy, protein-free tallow, or rawhide).

^{*} Ungulates in the <u>sub-family</u> bovinae which is a grouping under the Bovidae <u>family</u>, which is a family under the <u>sub-order</u> Ruminata.

Production facilities (name facility (ies) and impeach facility)	oort permit number (non-bovinae) related to
Facility Name	Non-Bovinae Permit Number
Country of Origin and/or processing	
 The pet treats or compound pet chews were legally imported into the U.S. and processe the U.S.; and 	
The pet food, treats, or compound chews of the U.S. as finished product from a third could	pject of this shipment were not imported into
NOTE: Finished products imported into the U.S. (with or without new packaging) must me manufacturing (third) country, as stipulat Directives. These products will require a	eet CFIA's requirements for entry from the ed in Canadian import Policies and/or
Signature Name: Title:	