

Tissues ineligible for export to Japan are those that are designated as specified risk materials in Japan, comprising the head, excluding tongue and cheek meat, the palatine and lingual tonsils, the spinal cord and dura mater, the distal ileum, and the vertebral column<sup>2</sup>, including the dorsal root ganglia.

### 3. AGE VERIFICATION

Beef products eligible for export to Japan must be derived from cattle that are 20 months of age or younger at the time of slaughter, using the processes and methods described in "Age Verification : Age Determination of Cattle to Qualify Canadian Beef and Beef Products for Export to Japan." - <http://www.inspection.gc.ca/english/???/shtm> (under construction).

### 4. REQUIREMENTS APPLICABLE TO ALL REGISTERED BEEF ESTABLISHMENTS

All registered beef establishments in Canada must comply with the provisions described in Chapter 4, particularly Annex N, of the Meat Hygiene Manual of Procedures, with respect to SRM, including:

- (1) Use of dedicated tools, identified by colour-coding or other visual system, for severing of the spinal cord of animals of all ages and for removal of the spinal cord of animals aged 30 months or older, to prevent transfer of spinal cord tissue fragments to edible tissue.
- (2) Procedures for removal and disposal of SRM, as defined in Annex N, to prevent cross contamination of edible meat products.

Operators are required to reassess their HACCP plans to ensure the hazard associated with SRM (i.e. BSE infectivity) is identified on Food Safety Enhancement Program (FSEP) Form 5 (or equivalent) and that critical control points (CCP) are identified for animal aging, in the case of slaughter plants, and SRM removal. If the establishment is not yet recognized under FSEP, the operator is responsible for the development, implementation and maintenance of control programs (based on HACCP) that address all components of the SRM removal policy.

As prescribed in Chapter 3 of the Meat Hygiene Manual of Procedures, each establishment must have a written sanitation program, signed by the responsible plant official, that identifies the person(s) responsible for implementing the program, describes the daily procedures conducted before and during operations and the frequencies at which they are conducted to prevent contamination of edible products, and describes corrective procedures to be taken in response to occurrences of contamination. In particular, the program must address pre-operational requirements for the cleaning and sanitizing of food contact surfaces, equipment and tools, and provide for verification of the effectiveness of these procedures before the start-up of operations. Daily records are required to document implementation and monitoring of the sanitation program, deviations noted, and corrective and preventive actions taken.

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<sup>2</sup> For these purposes, the definition of the vertebral column does not include the vertebrae of the tail, the transverse and dorsal processes of the thoracic and lumbar vertebrae, and the wings of the sacrum.

## **5. SLAUGHTER ESTABLISHMENTS PRODUCING BEEF PRODUCTS FOR EXPORT TO JAPAN**

In addition to requirements outlined in Section 4, operators of slaughter establishments and integrated processing establishments are required to develop and implement written procedures to ensure the following:

- (1) that only products derived from cattle 20 months of age or less are prepared for export to Japan;
- (2) that all ineligible tissues are removed from these cattle in a hygienic manner to prevent cross contamination and commingling with meat products that may be exported to Japan; and
- (3) that the carcasses and meat products derived from these cattle are easily distinguished from other carcasses and beef products from the point at which the age is determined until the products are packaged and appropriately labeled or the carcass is removed from the establishment.

The written procedures should clearly outline the controls that will be implemented to ensure that applicable requirements are met and that eligible products can be readily distinguished from ineligible products at all times. The procedures must be acceptable to the inspector in charge and must include monitoring, verification and record-keeping activities, deviation procedures and be auditable and effective.

The procedures must address the following, as appropriate to the establishment and to CFIA verification needs:

- Determination of the age of cattle by a method acceptable to the CFIA.
- From the point where age is determined, distinguishing cattle determined to be 20 months of age or less and/or the carcasses, offal and other parts of carcasses derived from such cattle.
- Application of a mark or device to clearly identify the carcass sides of animals 20 months of age or less.
- Hygienic removal of the head, excluding tongue and cheek meat, the palatine and lingual tonsils, the spinal cord and dura mater, the distal ileum, and the vertebral column, including the dorsal root ganglia.
- Cutting/deboning of eligible carcasses in distinct lots, segregated temporally or by space from other carcasses and parts thereof.
- Labelling of boxes containing eligible meat or offal in a manner that will easily distinguish them from boxes containing meat or offal derived from other cattle.

## **6. CFIA VERIFICATION**

CFIA inspection staff routinely verify the accuracy and/or effectiveness of operator implementation of the following requirements:

- Determination of age and identification of eligible carcasses, offal and other parts.

- Removal of ineligible tissues and related hygienic procedures.
- Distinguishing carcasses, offal and other parts.
- Labelling.
- Sanitation program.

The verification activities must be carried out daily in slaughter establishments.

Where compliance with these conditions cannot be verified, certification of product for export to Japan will not be provided.

A monthly review of the establishment's performance is conducted by the veterinarian or inspector in charge of each establishment. The report generated from this review is submitted to a Regional Veterinary Officer (in the case of a slaughter establishment) who will follow up on any concerns raised by the report. A quarterly review of the establishment's performance and CFIA verification responsibilities is conducted by a Regional Veterinary Officer.

Compliance and enforcement actions are taken by inspection staff when deviations are noted. Typical actions that are within the authority of inspection staff include:

- Placing product under detention pending rework (e.g. carcasses with remnants of spinal cord).
- Requiring an operator to develop and implement corrective and/or preventive measures with respect to deficiencies identified in a plan or program.
- Deeming product to be ineligible for export to Japan if age determination, removal of ineligible tissues, distinguishing and/or labelling requirements cannot be verified.
- Refusing to certify product for export if compliance with export requirements has not been achieved or cannot be verified.
- Ordering the suspension of operations in all or part of an establishment if a significant food safety risk is identified and cannot be immediately controlled.

Executive staff in CFIA Area Operations have authority to suspend an establishment's License to Operate, as necessary.

Canadian Food Inspection Agency

March 23, 2005

**Age Verification**

**Age Determination of Cattle to Qualify Canadian Beef and Beef Products for Export to Japan**

**INTRODUCTION**

The purpose of this document is to describe the processes and methods by which the age of cattle presented for slaughter will be determined and verified to ensure that only beef and beef products derived from animals 20 months of age or less will be certified for export to Japan.

**2.0 THE CANADIAN CATTLE IDENTIFICATION (ID) SYSTEM**

The minimum standards for cattle identification in Canada are established in the federal *Health of Animals Regulations* and are enforced by the Canadian Food Inspection Agency (CFIA).

Under the *Health of Animals Regulations*, all cattle leaving a farm must be identified by a unique number appearing on an ear tag in numeric form and either as a bar code or encrypted in an electronic device. Radio frequency identification (RFID) was implemented in the Province of Quebec in 2002. While RFID tags have also been available for use elsewhere in the country, the bar code format has been the norm in the rest of Canada since the national ID system was implemented in 2001. The bar code format is now being replaced by RFID in both the dairy and beef sectors, starting in 2004.

The system in Quebec, developed and managed by Agri-Traçabilité Québec (ATQ), currently includes the birth date for all cattle born in the Province. The national system, developed and maintained by the Canadian Cattle Identification Agency (CCIA), was recently modified to enable the entry of birth date information for cattle born in the rest of the country. Further information on the CCIA and ATQ is provided in Attachments 3.1 and 3.2, respectively.

The identification numbers recorded on the ear tags are captured in the CCIA or ATQ databases at the time of manufacture and the information in the database is updated to identify the holder of the tags each time the tags change hands in the distribution system. When ear tags are purchased by a cattle producer, the identification numbers are then associated with a specific premises identified by name and location. The producer provides information to the CCIA or ATQ to identify the animal to which each ear tag and associated identification number has been applied, either by direct entry into the database via the Internet or in other formats for entry by the CCIA, ATQ or an authorized third party (a proxy). Identifying information may include the identification numbers of the calf's sire and dam, its gender and its date of birth.

Mandatory identification has been in place since 2001, which means that the birth herds of all cattle born since then can be readily identified for the purpose of verifying the accuracy of birth dates entered into the CCIA and ATQ databases.

### **3.0 RECORDING DATE OF BIRTH**

When the birth date of an animal is entered into the CCIA or ATQ database, the method by which the date was determined is entered at the same time. Acceptable methods for determining the age of an animal include the following:

- The actual date on which a calf was born.
- The first day of the calving period in which a group of calves was born. (This date becomes the *de facto* date of birth for all calves in the group.)

The above dates are based on observation by the owner, family members or employees of a cattle ranch or farm and are duly recorded in written or electronic herd records maintained on the premises, before being entered into the CCIA or ATQ database. Birth date information is only accepted from validated<sup>d</sup> producers to verify known source and ensure data integrity.

### **4.0 VERIFYING ACCURACY OF BIRTH DATES**

All birth dates entered in the CCIA or ATQ database are subject to third-party audit to verify their accuracy. Herd records to be audited are determined by random selection of animals from among those with birth information entered in the database. The initial approach is further described in Attachment 3.3.

Audits may be conducted by private veterinarians, brand inspectors, employees of the federal or provincial governments, or other independent parties identified by a government body.

### **5.0 AGE DETERMINATION FOR SLAUGHTER**

When animals are ready or nearing readiness for slaughter their ear tags are scanned to capture their unique CCIA or ATQ identification numbers. This may take place at a beef producer's premises or at an auction market where animals are assembled for sale. Authorized<sup>d</sup> producers or auction market operators query the CCIA or ATQ database to obtain the birth dates associated with the identification numbers of the animals in question. Animals determined to be 20 months of age or less according to the birth dates are then presented for slaughter as a group of animals eligible to provide meat and meat products for export to Japan. These animals are accompanied to the abattoir by a report generated from the CCIA or ATQ system which documents the identification numbers and associated birth dates of the animals.

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<sup>1</sup> Validated producers are those who have been assigned unique user names and passwords by the CCIA to enable direct access to the database for the purpose of entering data concerning their herds, such as animal birth dates.

<sup>2</sup> Authorized by the CCIA or ATQ to access the database for the purpose of obtaining the recorded birth dates of animals in their possession.

At the abattoir, the establishment operator confirms the ages of animals presented for slaughter and maintains the animals that are confirmed to be 20 months of age or less in identifiable groups, segregated from animals that are older than 20 months or whose ages have not been determined.

In situations where the ages of animals arriving for slaughter have not been pre-determined, an authorized establishment operator may query the CCIA or ATQ database to obtain the birth dates of the animals to determine their ages. As above, animals determined to be 20 months of age or less would be segregated from animals that are older than 20 months or whose ages have not been determined.

The performance of producers and auction market operators is subject to audit by the CFIA or a third party identified by CFIA. The performance of establishment operators is monitored by on-site CFIA inspection staff as part of their routine inspection activities. The purpose of the auditing and monitoring is to verify the accuracy of age determination and the resultant sorting and disposition of animals.

## **6.0 INTERIM PROCEDURES FOR ANIMALS BORN OUTSIDE QUEBEC IN 2004**

The vast majority of animals born in 2004 are no longer on their premises of birth, but rather are located in feedlots owned by other parties. Furthermore, very few, if any of these animals would have their dates of birth recorded in the CCIA database. Therefore, the procedures described below are intended to enable the marketing of meat from animals 20 months of age or less during 2005. These procedures are founded on the fact that animals born in 2004 are easily distinguishable, by their physical appearance, from animals that were born the year before.

Feedlot operators with animals having the appearance of yearlings or younger animals scan the ear tags of these animals and forward lists of the identification numbers to the CCIA. The CCIA, in turn, contacts the original owners of the animals to ask them to extract the birth date information for the animals in question from their herd records and provide it to the CCIA, either by direct entry into the database or via a Proxy. The CCIA subsequently returns the ear tag lists with the associated birth dates to the originating feedlot operators. Alternatively, the CCIA may simply notify authorized feedlot owners that the requested birth dates have been entered into the database and are available for downloading.

In cases where the original owners of the animals do not have birth dates in their herd records, the owners are advised to enter a default date of January 1, 2004, or the first date of the month in which the first calf in a group was born if that can be reliably determined. The feedlots in which these animals reside are subject to audit by a third party to verify the reported identity of the animals and that the animals have the appearance of yearlings or younger animals. Records showing the dates on which animals had entered the feedlot may also be examined for supporting information.

## 7.0 COMPLIANCE

The CFIA is responsible for the enforcement of the Canadian Cattle Identification Program, in accordance with its responsibilities under the *Health of Animals Act* and *Regulations*. The objective of the enforcement strategy is full compliance. Where non-compliance persists, the CFIA issues administrative monetary penalties for violations of the *Health of Animals Regulations* pertaining to cattle ID. Prosecution also remains an option and the CFIA reserves the right to proceed with a prosecution under the *Health of Animals Act*.

In the event that the farm audit visit determines that the birth date information in the database is inaccurate, the following actions will apply:

The birth date information in the database will be corrected.

Other than for a very minor deviation, the database will flag that the birth date record in question as well as the other birth date records from the same producer during the same calendar year are not recognized as official, and can not be used for export certification purposes.

Any producer making a false or misleading statement to an inspector or a veterinary officer is also subject to an administrative monetary penalty of \$4,000 under the *Agriculture and Agri-Food Administrative Monetary Penalties Regulations*.

Attachment 3.4 provides a copy of Part XV of the *Health of Animals Regulations* pertaining to the national cattle identification requirements and prohibitions. The relevant portions of the *Agriculture and Agri-Food Administrative Monetary Penalties Regulations* is provided in Attachment 3.5.