

Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250

EXPORT PROCEDURES FOR SHELL EGGS TO CANADA, January 30, 2019

PURPOSE

This instruction outlines product specifications and facility requirements for plants packing eggs for export to Canada. In order to be eligible to pack eggs for export to Canada, plants must meet the following requirements:

POLICY

I. Export Verification and Processing Records

A. All requirements listed in <u>General Export Certification Requirements</u> must be met in addition to the procedures listed in this document.

II. Agricultural Marketing Service (AMS) biosecurity policy

- A. AMS employment policy prohibits personnel from owning avian species or operating farm with avian species.
- B. AMS personnel must follow each egg producer's/packer's established biosecurity procedure to prevent the risk of disease transmission.

III. AMS and APHIS Agreement – Animal Health Certification For Shell Eggs

- A. AMS, Livestock and Poultry Program (LP) is recognized by the Animal and Plant Health Inspection Services (APHIS), USDA, as an authorized certifying agent.
- B. APHIS officials authorize animal health attestations for inclusions in AMS *Certification Statements for Shell Eggs.*
- C. APHIS officials notify AMS when any statement is affected, or animal health restrictions are imposed upon an identified geographical zone in the United States.

GENERAL PROCEDURES

I. Product Requirements

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

"The eggs covered by the attached USDA certificate did not originate from a flock in a layer house with an environment testing positive for the presence of



Agricultural Marketing Service

Salmonella Enteritidis (SE) or from eggs testing positive for SE."

- B. All shell eggs must originate from chicken laying flocks (Gallus Domesticus) located in the United States of America.
- C. Product must be processed and packed under continuous USDA supervision in an official USDA approved shell egg facility.
- D. Product must be washed and sanitized with compounds approved by USDA for food use.
- E. The shell eggs must be processed, packaged, labeled, and certified fit for human consumption in accordance with the Regulations Governing the Voluntary Grading of Shell Eggs (<u>7 CFR Part 56</u>).

II. Grade Requirements

The shell eggs must be graded and certified as U.S. Grade A or better, as outlined in the United States Standards, Grades, and Weight Classes for Shell Eggs (AMS 56).

No more than 7 percent undergrade eggs (including individual underweight eggs) will be permitted at origin.

III. Weight Requirements

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

Weight Class	Minimum individual egg weight		
Jumbo	70		
Extra Large	63		
Large	56		
Medium	49		



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250

42

Small

IV. Animal Health Verification

Shell eggs must be derived from *breeder flock(s)* that participate in the National Poultry Improvement Plan (NPIP). The *layer flocks* must also be registered with the NPIP H5/H7 Avian Influenza Monitored Program.

- A. <u>NPIP Breeder Flock Requirement</u>: Producers must provide a copy(s) of APHIS Form VS 9-3, Report of Sales of Hatching Eggs, Chicks and Poults to the USDA Grader for each layer flock used to complete the export consignment. For intrastate movement, where the Form VS 9-3 would not be issued, producers must provide the USDA Grader with an invoice(s) listing their NPIP approval number for each flock.
- B. <u>NPIP Table Egg Layer Flock Requirement</u>: Prior to processing, USDA Graders will verify that each source flock is listed on the <u>NPIP website</u> for monitoring Avian Influenza. Eligible source flock(s) utilized to fill export orders will be recorded on the daily grading worksheet, LP-75 or LP-211.

V. Salmonella Enteritidis Controls

Shell egg producers must be in compliance with the Food and Drug Administrations (FDA), Final Rule for the Prevention of Salmonella Enteritidis in Shell Eggs during Production, Storage, and Transport. A producer receiving a "Letter of Warning" from FDA officials is not eligible to export until FDA provides information that corrective action(s) has been implemented. The LP National Office will notify appropriate regional staff when a facility is ineligible to export due to FDA regulatory action.

To be eligible for export to Canada, the shell eggs may not originate from a flock(s) that has been identified as being a source for SE. Additionally, all shell eggs must originate in a processing plant found to be clean of SE (negative test results) as determined by semiannual environmental sampling and testing of the processing plant premises and equipment.

Alternatively, management may elect to sample and test for all Salmonella species. Rapid test procedures may be used to determine the presence of salmonellae by classifying the group detected.

Salmonella Enteritidis is classified as group D. A processor must serotype all group D salmonella positive environment swab test results to identify the salmonella species. Laboratory tests showing a sample(s) positive for SE will result in classifying the processing facility as ineligible to export table eggs to Canada and the plant will be removed from the list on the AMS website. Retesting (swabbing) the environment will not be permitted until an AMS representative has verified that a thorough cleaning of the premises and equipment has taken place.



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 4 of 15

A. <u>Environmental Sampling Procedures</u>

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

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

B. <u>Equipment/Supplies</u>

- 1. Sampling kit including:
 - Refrigerant packs.
 - Individually wrapped sterile cellulose sponges.
 - 10 ml of sterile neutralizing buffer (Difco Neutralizing Buffer is the preferred buffer to be used when the samples will be analyzed at the USDA laboratories listed in this instruction). Use of other buffers will be as directed by the laboratory analyzing the samples.
 - Pre-labeled, sterile sampling bags.
 - Disposable sterile sampling gloves.
 - Polyfoam insulated shipping container.
- 2. Single use seals.
- 3. Plastic bags.
- 4. Clean shirt, trousers (pants), lab coat, and hair and facial coverings, as appropriate, should be worn. Boots and footwear should be cleaned and sanitized prior to sampling.
- 5. Fine-tipped waterproof felt pen for labeling samples.
- 6. Company letterhead stationery to record and accompany the individually identified samples sent to the laboratory.
- C. <u>Selection of Sampling Sites</u>

The CFIA guidance for environmental sampling states that a minimum of 50percent of the swab samples must originate from direct product contact surfaces.



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250

Sampling sites may vary among packing plants depending on the type of equipment in use.

GRADING MACHINE	UNGRADED EGG COOLER
Loader/Transfer Cups	Incoming Egg Trays
Washer Brushes	Incoming Racks
Washer Roller Conveyor	
Washer Exhaust	GRADING ROOM
Egg Dryer (Plenum)	Wooden Pallets/Dividers
Oiler (Plenum)	Carton/Box Conveyors
Candling/Segregation Booth	
Scale/Conveyor Belts	OTHER ROOM
Egg Carriage System	Washroom (Door Handle or Sink Taps)
Packing Heads	
Foam Disks	GRADED EGG COOLER
Clam Shells	Outgoing Racks (if applicable)
Main Conveyor Belt	Outgoing Packaging Material

Selection of Sampling Sites – DO NOT SWAB FLOOR DRAINS

D. <u>Aseptic Sampling Technique</u>

- 1. The sampling will be conducted by plant management under the supervision of the USDA grader or the Federal-State supervisor (or assistant) prior to the starting operations. Specially trained plant employees shall aseptically collect and identify samples for submission to the laboratory. A copy of the selected sample sites will be provided to the USDA grader.
- 2. It will be necessary to select environmental samples twice annually in each plant electing to export table eggs to Canada. The sampling frequency should be random. The USDA grader will maintain a sample frequency log and the list of sample sites. The list will serve as a reference and may be discarded following collection of samples for a subsequent 6-month period.
- 3. Prior to sample collection, plant management and the USDA representative will review proposed sample sites to assure random selection, as suggested in Section C. The ten samples shall be collected in a manner proceeding from the finished product area(s) to the product presented for processing.
- 4. The following guidance is provided for aseptic sample collections:
 - a. Remove all jewelry (rings, watches, etc.) and thoroughly wash and sanitize hands. Individuals with sores or cuts on their hands should



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 6 of 15

not take samples.

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

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

When swabbing an identified area, vigorously rub the sponge over the surface to be sampled until any soil is removed. If excess fluid is present, wring the fluid in the sponge into the sampling bag, and continue rubbing the sample site. With one sponge, sample as much of the surface in question as possible. The assistant should aid in the sampling by exposing or stabilizing the surface to be sampled



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 7 of 15

without touching it.

- Upon completion of swabbing the area return the sponge to the sample bag without further contact to prevent contamination. Close the bag by holding it on both sides by the yellow ties, twirl the bag around two to three times over itself, and bend the twist ties in toward each other to form a closure over the bag. Do not twist the twist ties around each other.
- Discard used gloves.
- 5. Samples are subject to microbiological analysis and must be placed under refrigeration immediately after collection. Do not freeze the samples.
- 6. Caution shall be exercised when shipping samples for laboratory analysis. A polyfoam- insulated container should be used for shipping. The samples shall be properly cooled prior to packing with frozen refrigerant packs placed above and below the samples. Additional packing material may be used as an aid to maintain sample quality during shipment.

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

- a. <u>Tape Method</u> Strap the circumference (including the bottom and the top of either the extern al or internal shipping container) with a single piece of 1/4 to 1/2- inch nylon reinforced tape or its equivalent. Bring the two ends of the tape through a "single-use" seal (provided by the company), locking the tape inside the seal when it is closed. Wrap the seal with additional tape to protect it during mailing. Record the seal number(s) used in the "Remarks" section of the sampling information letter.
- Plastic Bag Method Place the sample(s) or inner shipping container inside a plastic bag. Close the plastic bag and "tie" it using 1/4 to 1/2-inch nylon reinforced tape. Secure the two ends of the tape with a seal as in (a.) above. Wrap the seal in additional tape to protect it during mailing. Record the seal number(s) used in "Remarks" section of the sampling information letter.
- 7. The materials required for preparing the samples are:
 - a. <u>Tape</u> Standard 1/4 or 1/2-inch nylon reinforced tape may be



provided by the official plant or obtained from your supervisor.

- b. <u>**Plastic Bags</u>** Appropriately sized plastic bags may be provided by the official plant or obtained from your supervisor.</u>
- c. <u>Single-Use Seals</u> The seals will be provided by the company.

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

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

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

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

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

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



Agricultural Marketing Service

Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 9 of 15

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

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

E. <u>Evaluation and Follow-up</u>

Management has the option to sample and test for all species of salmonellae without serotyping the species. However, environmental test results found to be positive for Salmonella will result in a firm being ineligible to export shell eggs to Canada unless the results are determined negative for SE. The reporting of any positive test result(s) will require the plant to immediately clean and disinfect the facility premises and egg processing equipment, as applicable.

Follow-up samples shall be taken subsequent to cleaning from sampling site(s) where positive results for Salmonella or SE were reported. The follow-up aseptic sample collection must be completed under USDA supervision. Samples shall be collected as described under aseptic sampling techniques and shipped to the laboratory in a cooler with freezer packs. Certification of product for export to Canada shall be discontinued while the follow-up samples are being analyzed and until the results are found negative for SE.

VI. <u>Reporting of Eligible Plants</u>

A list of plants eligible to export table eggs to Canada is available on the Agricultural Marketing Service (AMS) website at: <u>USDA AMS Table Egg Export</u>. The list will be updated when a plant's eligibility to export changes. The USDA grader or Federal-State supervisor (or assistant) will notify the Regional Director of the date that the laboratory results were completed. The initial swab sample results are to be forwarded to the National Office, it is not necessary to forward subsequent results. The Regional Director is to notify the National Office on the status of plants eligible to export:

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

Notification of continued approval must be received in the National Office within 15



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 10 of 15

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

VII. Packaging/Packing

- A. All packing material must be new, showing no evidence of previous use.
- B. The interior packaging material (cartons and flats) must be new, showing no evidence of adhering foreign material or previous use.
- C. Pallets must be new or good used, free of visible evidence of adhering foreign material, and/or structural damage.

VIII. Labeling

A. Retail Package Labels

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

- 1. Product packed in USDA shielded cartons must bear the plant number and lot number.
- 2. The Canadian requirements also state that all shell egg cartons must bear a "Best Before" date, not exceeding 45 days including the day of pack as follows: **Best Before / Meilleur Avant: NO 04** (Abbreviation of this statement is not allowed.)

The exception is the province of Quebec, which states the "Best Before" date, may not exceed 50 days from the date of pack.

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

January J	JA	July	JL
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Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250

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

5. Nutritional information must be declared in the correct Canadian "Nutrition Facts Table" format.

B. Shipping Case Labeling

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



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 12 of 15

C. Specialty Egg Labeling Claims

Before shell eggs destined for Canada can be labeled "organic", a certifying agent accredited by USDA must approve the production and processing operations according to the USDA National Organic Program standards. Plant management must provide the grader a copy of the producer's and packer's organic certificate issued by the accredited certifying agent. The following information is to be included on the retail packaging material:

- 1. The name of the accredited certifying agent must appear on the principle display panel of the egg container. Use of the certifying agent's logo is optional.
 - a. When management requests certification of loose-packed organic eggs, an additional statement is to be recorded in the remarks section of the grading certificate.

"Product meets the requirements for labeling shell eggs as organic in accordance with Canadian standards. The eggs are labeled, For Export Only."

- 2. Use of the term "Free Run" is permitted provided an explanation of the term is included on the egg carton. Placement of the explanation can be on the in-lid of the egg carton.
 - a. If management requests certification of loose-packed eggs originating from cagefree layers, record the following statement in the remarks section of the grading certificate.

"Eggs originated from a cage-free layer flock."

Similarly, when loose-packed specialty eggs (such as eggs with enhanced levels of Omega-3 fatty acids or vitamins) are identified, this type of declaration may be declared, upon verification, in the remarks section of the certificate. Plant management will be responsible for providing the Canadian officials, upon request, laboratory analysis to support nutritional marketing claims listed in the remarks section of the grading certificate.

"Each individual egg contains 300 mg. of Omega-3 fatty acids."

"Good source of Vitamin D."



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250

IX. Transport Unit

Transport units/containers used to export eggs must be of sound construction and clean. The refrigeration unit shall be set at 45°F or lower and producing cool air before loading. Graders are to document the cleanliness of the transport unit and verification that the transport unit is supplied with functional refrigeration equipment on Form LP-75 or LP-211, as applicable. When unsanitary conditions are observed in a transport unit or the refrigeration equipment is not functional, the grader will notify a responsible plant official of the conditions. Product is not to be loaded on to the transport unit until the unsanitary condition of equipment has been corrected. When such conditions occur, the USDA grader will document the unacceptable condition, including the name of the plant official notified, on the applicable worksheet.

The transport unit must be sealed (plant/company seal) prior to departure from the processing facility. The USDA grader is not required to be present at the time of shipment provided the condition of the transport unit is acceptable, the shipping cases are properly identified, and the seal(s) number is recorded on the certificate issued. The seal(s) number must appear on the Form LP-210S certificate issued covering the shipment.

X. Duration of Quality (Expiration Dating)

When utilizing a "Best Before" date in excess of 45 days, the following statement must be placed in the comments section of the Form, LP-210S:

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

XI. Certification

When completing the certificate (Form LP-210S) the following information must be included:

- The statement "The product is equivalent to Canada Grade A."
- The statement "Product of the USA."
- The statement "Product complies with the Safe Food for Canadians Regulations."
- Company seal number.
- All certified eggs must be expressed as a 15-dozen box equivalent. Insert the words "See Remarks" in the "Total Cases" space of the grading certificate. Under "Remarks" record the total number of cases or pallets (loose-packed eggs) and the 15-dozen box equivalent.



Agricultural Marketing Service

- The percentage of underweight eggs found in a lot shall be reported by inserting above the "underweight" column the statement "**under grams**."
- Disease Free Statement(s):

The Canadian Food Inspection Agency (CFIA) requires a statement attesting that the eggs did not originate from a source flock currently under a control zone for Highly Pathogenic Avian Influenza (HPAI) or Virulent Newcastle Disease (vND).

For all shell eggs derived from flocks located in states with no control zones, AMS graders will add the following statement to the remarks section of the LP-210S certificate:

 "I, the undersigned, salaried inspector of the Agricultural Marketing Service (AMS), after due inquiry and to the best of my knowledge, do hereby certify that the poultry or bird products/by-products within this certificate are exported from the United States, and did not originate in a current CFIA recognized quarantine control zone established due to the detection of highly pathogenic avian influenza (HPAI) or Newcastle disease (ND), as these diseases are defined by the World Organization for Animal Health (WOAH)."

For all shell eggs from states affected with any HPAI or vND control zones, management must obtain VS Form 16-4 from APHIS with the following remarks:

 "I, the undersigned, salaried veterinarian of the USDA, after due inquiry and to the best of my knowledge, do hereby certify that the poultry or bird products/by-products within the certificate number (insert number here) are exported from the United States, and did not originate in a current CFIA recognized quarantine control zone established due to the detection of highly pathogenic avian influenza (HPAI) or Newcastle disease (ND), as these diseases are defined by the World Organization for Animal Health (WOAH)"

Upon completion of the form LP-210S and prior to shipment, management must contact the APHIS Area Veterinarian-in-Charge (AVIC) for the state(s) in which the layer flock(s) is located. It is the exporter's responsibility to forward the Shell Egg Grading Certificate, form LP-210S to the applicable APHIS AVIC area office to request and secure the VS Form 16-4. Both the VS Form 16-4 and form LP-210S



Agricultural Marketing Service Quality Assessment Division 1400 Independence Avenue SW, Stop 0258 Washington, DC 20250 Exports E-02 January 30, 2019 Page 15 of 15

(original with signature in blue ink) must be presented to CFIA authorities at the point of entry to Canada. A current directory of APHIS AVIC contacts may be found at <u>https://www.aphis.usda.gov/animal_health/contacts/field-operations-export-trade.pdf</u>

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