

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS DIRECTIVE	9040.1, Revision 3	3/1/06
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RE-INSPECTION OF PRODUCT INTENDED FOR EXPORT

I. PURPOSE

This directive provides inspection program personnel with the procedures for reinspecting product that has been presented for export. These responsibilities and procedures apply whether the product is located at the establishment, or off-site at a non-official establishment, such as at an Identification (ID) warehouse (as provided for at 9 CFR 350.3(a)) or at a cold storage facility.

II. CANCELLATION

FSIS Directive 9040.1, Revision 2, dated 8/12/93

III. REASON FOR REISSUANCE

This directive has been revised to provide for the examination of boxes or containers in situations where inspection program personnel have a reason to question whether the product as labeled meets the importing country's requirements.

IV. REFERENCES

9 CFR 322.2, 381.105, and 350.3(a)
FSIS Directives 7520.2 and 9000.1 and 12,600.1

V. POLICY

A. The regulations at 9 CFR 322.2 and 381.105, provide for the re-inspection and certification of products for export. The purpose of a re-inspection of product that is to be exported is to verify the product's safety, wholesomeness, identity, and eligibility for export. Inspection program personnel conduct a re-inspection of product for export after they receive and review FSIS Form 9060-6, Application for Export.

B. As set out in FSIS Directive 9000.1, Export Certification, inspection program personnel are to verify that each product listed on the application complies with the meat and poultry product regulations and the importing country's requirements (e.g., that each product listed on the application is eligible for export to the country listed on the application).

DISTRIBUTION: Inspection Offices; T/A Inspectors; Plant Mgt., T/A Plant Mgt., TRA; ABB; TSC; Import Offices

OPI: OPPED

C. If the application is complete and accurate, inspection program personnel perform an organoleptic examination of the shipping cartons for signs of poor product handling or storage (e.g., torn, damp, damaged, or off-condition cartons). If the cartons are sound, inspection program personnel proceed by following the instructions in FSIS Directive 9000.1 regarding signing the application, FSIS Form 9060-6, Application for Export Certificate, and issuing the FSIS Form 9060-5, Export Certificate.

VI. INSPECTION PROGRAM PERSONNEL RESPONSIBILITIES WHEN PRODUCT HAS BEEN FOUND NOT TO BE SOUND

A. If inspection program personnel find signs of poor product handling and storage while conducting the organoleptic examination of the shipping cartons at either official or non-official establishments, they are to (under Inspection System Procedure codes 06 using the inspection methodology outlined in FSIS Directives 5400.5 and 5000.1, Revision 1):

1. In official establishments and non-official establishments, randomly select up to 5 percent of the boxes or containers. In considering the percentage of boxes to select, inspection program personnel should consider the basis for their concern and the need to expose the contents of boxed product to the environment:

a. In an official establishment, request that the applicant open the selected sample of boxes or containers in a manner that will not create insanitary conditions or lead to product adulteration; and,

b. In a non-official establishment, request that the applicant open the selected sample of the boxes or containers in a sanitary environment (e.g., identification services area of the facility), or have the shipment or selected sample of the boxes or containers moved to a facility where boxes can be opened in a sanitary environment (e.g., from a cold storage facility without an ID services area).

2. Reinspect the contents for soundness and wholesomeness.

NOTE: If product is frozen, inspection program personnel are to have the official establishment or identification facility temper or thaw all individual packages in the randomly selected boxes or cartons under sanitary conditions at the official establishment or in the ID services area of a non-official establishment to conduct the reinspection. If product is canned, inspection program personnel are to follow the instructions in FSIS Directive 7520.2, Procedures for Condition of Canned Product Container Examination.

a. If the product is found to be sound and wholesome, inspection program personnel may permit the product to be re-packaged (at the packers option), sign the export application, and proceed by following the instructions in FSIS Directive 9000.1.

b. If the product is found to be not sound or not wholesome, or the establishment or facility does not open the boxes, or if the establishment elects to not move the sample or cancels the shipment, and inspection personnel have reason to believe the product may be adulterated, inspection program personnel:

i. are not to sign the application,

ii. at official establishments when any of the product is determined to be unsound or unwholesome, are to issue a Non-Compliance Record under the appropriate 06 code and are to take the appropriate enforcement action FSIS Directive 5000.1, Revision 1,

iii. at non-official establishments when any of the product is determined to be unsound or unwholesome, are to detain product as set out in FSIS Directive 8410.1 and complete FSIS Form 8080-1 Notice of Detention (at non-official establishments).

VII. INSPECTION PROGRAM PERSONNEL RESPONSIBILITIES WHEN INFORMATION ON THE APPLICATION DOES NOT MEET THE REQUIREMENTS

A. If inspection program personnel have questions regarding the information on the application, they are to present them to the applicant as set out in FSIS Directive 9000.1 e.g., request applicant to provide supporting information that verifies that the requirements of the country importing the product have been met).

B. If inspection program personnel have reason to question whether the product is properly identified and labeled to meet the importing country's requirements, they are to (under Inspection System Procedure codes 04 using the inspection methodology outlined in FSIS Directives 5400.5 and 5000.1, Revision 1) follow the above methodology for:

1. Opening boxes to reinspect the product to ensure that it is properly labeled, not misbranded, and eligible for export to the country listed on the application; and
2. Taking and documenting enforcement or detention actions.

C. In official or non-official establishment if the product in the container or the labeling of the product does not meet the importing country's requirement.

1. Raise the concern with the applicant;
2. Document a memorandum of interview addressing what was discussed, and whether the concerns were adequately addressed; and
3. Provide a copy of the memorandum to the applicant and maintain a copy in the inspection files.

Direct questions to the Technical Service Center at 1-800-233-3935.



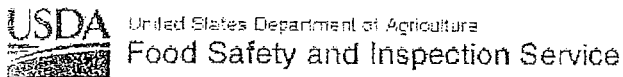
Assistant Administrator
Office of Policy, Program, and Employee Development

Annex 3

Employee Training

National Beef (California) Reports: Once the change to the QSA program was made concerning the stopping of pre-labeling boxes the following occurred:

- Changes were made and submitted to USDA AMS to approval
- USDA AMS approved the changes
- QSA Manual was updated with the revision
- All plant management and hourly work force that is involved in the production of Japan product in the packaging area were retrained on the revised QSA program
- Documentation of the retraining was placed on file
- USDA AMS and USDA OPEER reviewed the training and program and found it acceptable



Export Requirements for Japan

JA-144 (Jul 2, 2008)

Asterisks (*) indicate the most recent revision to these requirements. To search, click on your browser's "Edit" menu, then click on "Find (on this page)". Enter "*" in the "Find What" field, then click "Find" or "Find Next" until all asterisks have been identified.

Go to Poultry Export Requirements

Red Meat Export Requirements for Japan

Eligible/Ineligible Product

A. Eligible Products - The following products are eligible to be exported to Japan as edible product:

1. Beef and beef offal and veal and veal offal intended for export to Japan must be produced from animals slaughtered after 5:00 AM Eastern Daylight Time on July 27, 2006.

Fresh/frozen beef and beef offal and veal and veal offal derived from animals 20 months of age or younger. Spinal cord and spinal column (excluding the transverse process of the thoracic and lumbar vertebrae, the wings of the sacrum, and the vertebrae of the tail) must be removed. Eligible beef and beef offal and veal and veal offal must be produced under an approved AMS Export Verification (EV) program for beef to Japan. Information about the EV program for Japan and a list of BEV approved establishments can be obtained from AMS' Web site.

If FSIS inspection personnel become aware of concerns that an AMS approved EV establishment is not properly executing its EV program, export certification should not be issued for the product in question and AMS should be notified at ARCBbranch@usda.gov. Inspection personnel should include their immediate supervisor on messages to AMS. The following information should be included in the message:

- Establishment name, address, and establishment number
- Product type, product code, and quantity of product
- Date of production, lot number, and shift
- Date and nature of observation
- Name of country product is intended for export
- Export certificate number (if applicable)
- Any other information to verify claim
- Name of inspection official

Exporting establishments are cautioned that great care should be taken when assembling shipments of beef products for export to Japan. In particular, exporting establishments should establish and enforce sufficient management controls to prevent the inclusion of ineligible beef products in any box or other container that is exported to Japan.*

2. Pork and pork products.
3. Non-ruminant origin meat products produced using natural ruminant casings (See Processing Section and Documentation Section A.4.a. and b. Plant Eligibility

Section.)

4. Non-ruminant origin meat products produced using natural pork casings (See Documentation Section A.4.c.)
5. Non-ruminant origin meat products produced using artificial casings derived from cattle hides and pork skins. (See Documentation Section A.4.d. and e.)
6. Natural pork casings and imported natural ruminant casings. (See Processing, Documentation, and Plant Eligibility Sections.)

B. Ineligible Meat Products

1. Beef heads (hygienically removed tongues and cheek meat are eligible), processed beef products and veal products, ground beef and ground veal, and advanced meat recovery products containing beef or veal.
2. Meat and meat products derived from sheep and goats.
3. Coloring agents are not permitted in raw meat products.
4. Deer and elk meat

C. Eligibility of Meat Imported into the U.S.

1. Pork imported from Canada is eligible for export to Japan. See the documentation requirements in A.3.b. of the Documentation section. Pork imported from other countries is not eligible for export to Japan at this time.

Processing Requirements

Note: Exporters are advised to work closely with their importer regarding Japanese standards of meat products intended for export to Japan. The information presented below is not inclusive of all the details of the standards of composition and manufacture. Please contact the Technical Service Center at (402) 344-5000 if additional assistance is needed.

A. Processed Meat Product.

1. Unheated Meat Products (e.g., parma, prosciutto, coppa or country ham or unpasteurized ham requiring refrigeration)
 - a. May contain up to 70 ppm nitrite in the finished product (NOTE: USDA requires a minimum of 120 ppm nitrite going into non-heated, cured products. Non-heated, cured product containing a maximum of 70 ppm nitrite may be exported to Japan provided that the outside container is marked "For Export to Japan.").
 - b. Exporters should be aware of the raw material requirements for producing unheated meat products for Japan since they may have to document this information to their Japanese importer. The meat must be maintained chilled at 4° C (39.2° F) and the pH of the meat is to be 6.0 or below.
 - c. Smoked or dried product intended to be stored at room temperature must either have a pH below 4.6 or the water activity less than .93, if the pH is between 4.6 and 5.1.
2. Specifically heated meat products. (e.g., bacon, etc.)
 - a. may contain up to 70 ppm nitrite in the finished product,
 - b. must be heated to an internal temperature of 60° C (140° F) maintained for 12 minutes maximum or the equivalent. **Note:** Current Japanese regulations recognize the cooking standards for roast beef (9 CFR 318.17) as equivalent to the above requirements or the time/temperature chart listed below:

C°	(F°)	Time (min)
55	(131.0)	97
56	(132.8)	64
57	(134.6)	43

58	(136.4)	28
59	(138.2)	19
60	(140.0)	12
61	(141.8)	9
62	(143.6)	6
63	(145.4)	0

- c. Exporters should be aware of the raw material requirements for producing specifically heated meat products for Japan since they may have to document this information to their Japanese importer. The meat must be maintained chilled at 4° C (39.2° F) and the pH of the meat is to be 6.0 or below:
3. Heat treated products. (e.g., Ham, bacon, corned beef, sausage products)
 - a. May contain up to 70 ppm nitrite in the finished product,
 - b. Must be heated to an internal temperature of 63° C (145° F) maintained for 30 minutes minimum or equivalent. Current Japanese regulations recognize the following time/ temperature relationships as equivalent:

C°	(F°)	Time (min)
60	(140.0)	129
61	(141.8)	80
62	(143.6)	49
63	(145.4)	30
64	(147.2)	19
65	(149.0)	12
66	(150.8)	7
67	(152.6)	5
68	(154.4)	3
69	(156.2)	2
70	(158.0)	1
71	(159.8)	38 sec.
72	(161.6)	23 sec.
73	(163.4)	14 sec.
74	(165.2)	9 sec.
75	(167.0)	5 sec.

4. Dried meat products. (e.g., beef jerky, dried beef, salami)
 - a. May contain up to 70 ppm nitrite in the finished product,
 - b. Water activity must be under 0.87.
5. Sodium tripolyphosphate and sodium phosphate are permitted to be used in processed meats. Product descriptions entered on FSIS Form 9060-5 and FSIS form 9290-1 should coincide exactly with product name approved by the Label Review Branch (LRB).
6. Intestines
 - a. Pork intestines must be cleaned, then scalded at 80° C (176° F) for 3

minutes. When the export request is for chitterlings or bungs, scalding is not required.

7. Nongravid Uteri--Immediately after passing inspection, uteri must be chilled, preferably in crushed ice. Uteri are then drained, packed, and frozen. Hot freezing is not permitted.
8. Non-ruminant origin meat products produced using natural ruminant casings.
 - a. The natural casings must be derived from animals which were born and raised in countries other than the United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA.
 - b. U.S. establishments that process or repackage the imported natural casings and establishments that produce the meat product must only handle ruminant casings that comply with the source requirement in 1. for all production. Segregation programs are not permitted.
9. Imported natural ruminant casings
 - a. The natural casings must be derived from animals which were born and raised in countries other than the United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA.
 - b. U.S. establishments that process or repackage the imported natural ruminant casings must only handle ruminant casings that comply with the source requirement in 1. for all production. Segregation programs are not permitted.
10. Natural Pork casings
 - a. If U.S. establishments that process or repackage natural pork casings also process or repackage natural ruminant casings, the ruminant casings must comply with the source requirement in 9.a. above for all production. Segregation programs are not permitted.

Labeling Requirements

A. Meat Products

1. Cartons containing non-heated, cured only products with a maximum of 70 ppm nitrite must be labeled "For Export to Japan."
2. Water activity, pH, cooking temperatures and heated before packing/heated after packing, must be identified on the labels when printed in Japanese.
3. If there are no specification standards for processed meat products in Japan, then the product name can be used in the Japanese Label (example: Salisbury Steak.)

B. Net Weight

1. If not preprinted by the label manufacturer, the net weight (in kilograms) should be stenciled, stamped or handwritten on the carton. Pounds may be shown on the label as well.
2. Product arriving in Japan without net weight labeling on the retail packages must be weighed and labeled in compliance with the Japanese Measurement Law.

C. Food Additives. Japanese food additives requirements are very complex. Importers can provide samples of new products to the Ministry of Health and Welfare inspectors to verify that all additives are approved by Japan. Exporters are advised to work with their importers to confirm eligibility of additives in the products being exported to Japan.

D. Meat or meat products that deteriorate within days must bear a "use by" date, and products whose quality can be maintained longer than five days are required to show a "best before" date. This information must be present on imported products when the product enters Japanese commerce. The date information can be applied in the United States prior to export or it can be applied in Japan prior to release from a bonded

warehouse. This requirement applies to bulk packed products as well as consumer ready packages.

Documentation Requirements

A. Certification requirements for red meat products.

1. Obtain FSIS Form 9060-5 Meat and Poultry Certificate for Wholesomeness and FSIS Form 9290-1 (12/06/2000) Certificate for Export to Japan.
2. Fresh/frozen beef and beef offal and veal and veal offal
 - a. The export applicant must provide information about the consignment that includes specific product identification information, production date, number of boxes, manufacturer, and the statement "Product meets EV Program requirements for Japan" in Block 14 of FSIS Form 9060-6.
 - b. Obtain FSIS Form 9060-5, Meat and Poultry Export Certificate of Wholesomeness
 - c. Obtain FSIS Form 9290-1, Certificate for Export to Japan. See e. Clarification of Export Procedures for Certifying Product below for information about completing this certificate.
 - d. Obtain an FSIS Letterhead Certificate with the following statements:
 1. Cattle slaughtered for the production of the exported beef to Japan (hereinafter referred to as "the slaughtered cattle") have been born and raised only in the USA, or legally imported from Canada, or legally imported from the third free countries listed here and raised in the USA. Third free countries are: Norway, Hungary, Iceland, Mexico, Belize, Guatemala, Honduras, El Salvador, Nicaragua, Costa Rica, Panama, Dominican Republic, Chile, Commonwealth of the Northern Mariana Islands, New Zealand, Vanuatu, New Caledonia, Australia
 2. The slaughtered cattle were not suspect or confirmed BSE cases, or confirmed or suspected progenies, or cohorts of BSE cases, as defined in the Terrestrial Animal Health Code adopted by the World Organization for Animal Health (OIE).
 3. The slaughtered cattle were found to be sound and healthy as a result of ante- and post-mortem inspections conducted by USDA veterinary inspectors in the designated facilities at the time of slaughter.
 4. The exported beef to Japan fulfilled all of the required conditions described in the EV Program. In case the slaughtered cattle have been legally imported from Canada, criteria 5.2.1.1 or 5.2.1.2 of the EV program is applied in order to verify 20 months of age or younger. In case the slaughter cattle have been legally imported from the third free countries listed above other than Mexico and raised in the USA, only criteria 5.2.1.1 of the EV Program is applied in order to verify 20 months of age or younger.
 5. The exported beef to Japan has been handled at the designated facilities in such a way as to prevent contamination with any causative agents of animal infectious diseases until shipment to Japan.
 - e. Review Clarification of Export Procedures for Certifying Product prior to product certification.
3. Pork and pork products - The following statements and information must be included in the "Remarks" section of FSIS Form 9060-5:
 - a. For pork and pork products of U.S. origin:

"The USA is free of hog cholera; vaccination against hog cholera is prohibited; and importation of pigs vaccinated against hog cholera is prohibited."
 - b. For pork and pork products imported into the U.S. from Canada, and now being exported to Japan:

"for the product described above, the processing including slaughtering,

dressings, eviscerating, dividing and chopping or the manufacturing, has been done in accordance with Canadian livestock meat inspection requirements which are deemed equivalent to the Japanese Food Sanitation Law, and the Japanese Abattoir Law."

"Canada is free from hog cholera and that vaccination against hog cholera and the importation into Canada of pigs vaccinated against hog cholera is prohibited."

Also include the name, address, official establishment number of the Canadian facility and the slaughter or processing dates in Canada in the Remarks section.

It is the exporter's responsibility to provide a copy of an official Canadian Food Inspection Agency (CFIA) certificate that includes this information for the consignment in order for these statements to be included on the FSIS certificate. A copy of the CFIA certificate must also be presented at the Japan port of entry.

- c. Label claims such as "Berkshire" or "Kurobuta" should not be part of the product name identified on the export certificate. Further, additional certification statements referring to such label claims should not be included on FSIS export certificates.
4. Non-ruminant origin meat products produced using natural or artificial casings. In addition to the certification indicated above, the following specific certification is required for these products.
- a. For meat products using natural sheep casings the following statements must be included in the Remarks section of FSIS 9060-5:
 - (1) *"The casings are derived from animals which were born and raised in countries other than the United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA. At the time of import to the United States it has been confirmed that the casings do not have risk of infection with contagious animal disease by health certificates issued by the originating government."*
 - (2) *"Natural casings from (country of origin) of ovine origin."*
 - b. For meat products using natural bovine casings the following statements must be included in the Remarks section of FSIS 9060-5 or on an FSIS letterhead certificate:
 - (1) *"The casings are derived from animals which were born and raised in countries other than the United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA. At the time of import to the United States it has been confirmed that the casings do not have risk of infection with contagious animal disease by health certificates issued by the originating government."*
 - (2) *"Natural casings from (country of origin) of bovine origin."*
 - (3) *"The cattle origin raw material from which the certified casing were derived originate from raw materials from cattle slaughtered in countries other than those listed above, and these materials and final products were kept separate from any bovine materials from animals slaughtered in countries listed above."*
 - (4) *"The casings production facility is under official U.S. Department of Agriculture (USDA) supervision and maintains a system for tracing the animal*

- origin materials, which guarantees the origin (collagen production facility for artificial casings and country of origin for intestinal casings) can be identified."*
- c. For meat products using natural pork casings the following statements must be included in the Remarks section of FSIS 9060-5:
 - (1) *"The casings are free from animal infectious disease as a consequence of ante- and postmortem inspection conducted by official USDA inspectors. If the casings are imported from third countries, at the time of import into the United States, it has been confirmed that the casings do not have risk of infection with contagious animal disease by health certificates issued by the originating government."*
 - (2) *"Natural casings from (country of origin) of porcine origin."*
 - d. For meat products using artificial casing derived from pork skins the following statements must be included in the Remarks section of FSIS 9060-5:
 - (1) *"Artificial casings prepared exclusively from hides and skins."*
 - e. For meat products using artificial casing derived from cattle hides the following statements must be included in the Remarks section of FSIS 9060-5 or on an FSIS letterhead certificate:
 - (1) *"Artificial casings prepared exclusively from hides and skins."*
 - (2) *"The cattle origin raw material from which the certified casing were derived originate from raw materials from cattle slaughtered in countries other than those listed in the annex, and these materials and final products were kept separate from any bovine materials from animals slaughtered in countries listed in the annex."*
 - (3) *"The casings production facility is under official US Department of Agriculture (USDA) supervision and maintains a system for tracing the animal origin materials, which guarantees the origin (collagen production facility for artificial casings and country of origin for intestinal casings) can be identified."*

"Annex: United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA."
 - f. For meat products using artificial casings derived from cellulose, a statement indicating the composition of the casing must be included in the Remarks section of FSIS 9060-5. For example, "Artificial casings prepared from cellulose, fibrous paper, glycerin, and moisture".
5. Imported natural ruminant casings
- a. Obtain FSIS Form 9060-18. The following statements must be included the Remarks section or on an FSIS letterhead certificate:
 - 1. *"The casings are derived from animals which were born and raised in countries other than the United Kingdom (Great Britain and Northern Ireland), Ireland, Switzerland, France, Portugal, Belgium, Luxembourg, Denmark, the Netherlands, Liechtenstein, Germany, Spain, Greece, Italy, Czech Republic, Slovakia, Austria, Finland, Slovenia, Poland, Sweden, Israel, Canada, or the USA."*
 - 2. *"At the time of import to the United States it has been confirmed by official inspection, or confirmed by health certificates issued by the originating government that the casings do not have risk of infection with contagious animal disease. The casings were transported to the approved facilities in a manner to prevent contamination with infectious animal diseases."*
 - 3. *"The casings were stored in clean and sanitary containers and handled*