

Canadian Shellfish Sanitation Program - Manual of Operations

APPENDIX XI

PROTOCOL FOR SHELLFISH BROKERS AND LICENSED FISH IMPORTERS RESHIPPING TO AND WITHIN UNITED STATES

1. SCOPE

This protocol outlines the policies and procedures governing the inspection and designation of parties, other than federally registered shellfish processors, who take ownership of live or raw bivalve shellfish products from facilities listed on the Interstate Certified Shellfish Shippers List (ICSSL) and transport them to, from and within the United States (U.S.) without any further processing.

Shellfish brokers or licensed fish importers that carry shellfish to the U.S. may bring back molluscs to Canada with their own transport vehicle; however, in order to do this, they need to be listed on the ICSSL and develop a Shellfish Shipment Control Program (SSCP). As the parties described in the above paragraph do not operate processing facilities subject to federal registration, this protocol provides a mechanism for implementing controls that would allow such parties to be recommended by CFIA for listing to the ICSSL as a Canadian "Reshipper".

Reshippers (RS) are defined as those who purchase shucked shellfish or shellstock from other certified shippers and sell the product without repacking or relabelling to other certified shippers, wholesalers, or retailers. As these reshippers are non-registered establishments, the operation fee for processing shellfish does not apply. As per the definition, the reshipper only reships processed and packaged product from an ICSSL plant therefore they are not required to protect their water against backflow and back siphonage.

This protocol does not apply to federally licensed importers utilizing **common carriers** to move shellfish from the U.S. to Canada.

This protocol is consistent with the controls and requirements as specified in the Canadian Shellfish Sanitation Program (CSSP) and the appropriate sections of the U.S. National Shellfish Sanitation Program Model Ordinance.

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2. AUTHORITY AND REFERENCE DOCUMENTS

- ▶ *Fish Inspection Act*, R.S.C., 1970, C.F-12; Section 6
- ▶ *Fish Inspection Regulations*, C.R.C., 1978, c.802; (FIR)
- ▶ The Canadian Shellfish Sanitation Program - Manual of Operations
- ▶ Facilities Inspection Manual
- ▶ The Canada - United States Bilateral Agreement on Shellfish Regarding Sanitary Practices in the Shellfish Industries and Related Matters
- ▶ National Shellfish Sanitation Program, Model Ordinance (specifically Chapters X and XIV)

3. POLICY

3.1 Shellfish brokers and licensed importers involved in shipping live or raw bivalve molluscs to, from and within the U.S., as defined above, will be assessed by the CFIA and recommended for an RS listing on the ICSSL when the following conditions have been met:

- ▶ the shellfish being transported have been processed in (a) a federally registered Canadian shellfish processing plant listed on the ICSSL or (b) a shellfish processing plant listed on the ICSSL,
- ▶ the shellfish are identified with a tag as outlined in the Canadian Shellfish Sanitation Program Manual of Operations (or the U.S. Shellfish Model Ordinance for product originating from or destined to the U.S.),
- ▶ the shellfish are placed under temperature control until sale to the processor or final consumer,
- ▶ the shellfish shipments comply with all relevant requirements as contained in the Canadian Shellfish Sanitation Program Manual of Operations (or the U. S. Shellfish Model Ordinance for product originating from or destined to the U.S.) and,
- ▶ the requirements of this protocol have been implemented.

3.2 Shellfish brokers and licensed importers must develop and implement a Shellfish Shipment Control Program (SSCP). This SSCP must be submitted for review by the CFIA to verify that it meets the requirements of the protocol as detailed below.

3.3 Once CFIA has determined that the SSCP meets the requirements of the protocol, a CFIA Inspector may conduct

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a review of any aspect of the SSCP at any time.

- 3.4 The CFIA may cancel the eligibility of a participant under this protocol at any time if the company does not meet the conditions outlined in the protocol.

4. PROCEDURES

- 4.1 The SSCP submitted to CFIA for review should document the procedures and controls in place for shellfish transport, and must include the following components:

- a) background information, including company name, location, telephone number, primary contact, type of vehicle to be used to transport product, type of product to be shipped and any additional information related to the shipment of bivalve molluscs;
- b) record-keeping procedures and formats which track all shellfish shipments to, from and within the United States. The requirement for comprehensive records is necessary in order to facilitate recalls and follow-up on reports of illness when required and should, at a minimum, include:

- species;
- form (e.g., live, shucked, IQF);
- source plant (including ICSSL registration number);
- quantity;
- harvest date and location or production code;
- consignee; and
- transport information.

All records must be retained by the reshipper for three years, or for a period of time that exceeds the shelf-life of the product if that is longer than three years. Copies of the forms to be used should be included in the submission (see example Annex B).

- c) control measures to ensure the safe, sanitary transport of the product. This must include, as a minimum, controls for maintaining, cleaning, sanitizing and inspecting the storage area of the transport vehicle, temperature controls, and the monitoring and record keeping associated with these activities.

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- d) the procedure for notifying CFIA when a shipment is rejected or denied over a border by a regulatory authority.
- e) the names of personnel responsible for the development and implementation of the SSCP.
- f) a company representative's signature providing commitment to meeting the conditions of the protocol (see sample in Annex A).

4.2 Instances of non-compliance may result in the broker/dealer being declared ineligible for this program. Recommendations for ineligibility will be forwarded to the Regional Director or designate for review and action. Ineligibility will result in removal of the company from the ICSSL.

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ANNEX A

COMPANY DECLARATION

I, the undersigned, hereby agree to the requirements of this protocol and will maintain the necessary controls and records to ensure compliance.

Company Name: _____

Company Official: _____
Name (please print)

Title: _____

Date: _____

Signature: _____


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ANNEX B

LABELLING EXAMPLE

This tag is an example of a dealer's tag with the minimum required NSSP information in the required order.

Dealer means a person to whom certification is issued for the activities of shellstock shipper, shucker-packer, repacker, reshipper, or depuration processor.

| | | |
|--|--|--|
|  | DEALER NAME _____ CERT. NO. _____ Dealer Address City, State Zip Code | RETAILERS, INFORM YOUR CUSTOMERS Thoroughly cooking foods of animal origin such as beef, eggs, fish, lamb, poultry, or shellfish reduces the risk of foodborne illness. Individuals with certain health conditions may be at higher risk if these foods are consumed raw or undercooked. Consult your physician or public health official for further information. |
| | ORIGINAL SHIPPER'S CERT. NO. IF OTHER THAN ABOVE: _____ | |
| | HARVEST DATE: _____ | |
| | HARVEST LOCATION: _____ | |
| | TYPE OF SHELLFISH: _____ | |
| | QUANTITY OF SHELLFISH: _____ | |
| | THIS TAG IS REQUIRED TO BE ATTACHED UNTIL CONTAINER IS EMPTY AND THEREAFTER KEPT ON FILE FOR 90 DAYS. | |

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**ANNEX B
 SHELLFISH SHIPMENT CONTROL PROGRAM (SSCP) LEDGER - EXAMPLE**

| Shipping Date | Type of Shellfish | Quantity | Packing Info. | Harvest date | Harvest Location | Processor / ICSSL No. | Consignee | Transport Info. |
|---------------|-----------------------|----------|--------------------|------------------------|------------------------------|--|--|--------------------------------------|
| Mar. 3/03 | live manila clams | 300 lb | 6 sacks x 50 lb | Mar. 1/03 | NS 15, Okeover Inlet 15-4 | XYZ Shellfish Co. Shelburne, NS NS 345 SS | Caveat Emptor Seafood Restaurant Buffalo, NY | Yarmouth Transport Ltd. reefer truck |
| Mar. 6/03 | fresh shucked oysters | 50 lb | 5 cs. x 20 x 8 oz | Best before Mar. 20/03 | BC 6.3, Harley Bay | Hank's Prairie Oysters, Fort St. John, BC BC 1945 SP | Shangri-La Casino Las Vegas, NV | Alaska Airlines flight 789 |
| Mar. 6/03 | fresh shucked oysters | 100 lb | 10 cs. x 20 x 8 oz | Best before Mar. 20/03 | BC 6.1, Kitimat Arm | Hank's Prairie Oysters Fort St. John, BC BC 1945 SP | Honest Nat's Discount Seafood Boston, MA | Air Canada flight 2345 |
| Mar. 10/03 | IQF oysters | 200 kg | 10 cs x 2 X 10 kg | Feb. 28/03 | BC 24.9, Lemmen's Inlet 24-9 | Tofino Oyster Co. Tofino, BC BC 234 SP | The Fish Store at Pike Street Seattle, WA | Silverdale Transport Ltd. freezer |