

Guidelines For Completion of Attestation for Importation of Foods Containing Insignificant Quantity of Meat Products Exempted from the Provisions of Section 9 of the *Meat Inspection Act* Under Section 3.(1)(i) of the *Meat Inspection Regulations 1990*

1. Introduction

This document is intended for Canadian importers as a guide to completion of attached **Attestation – Annex I** and supporting **Calculation for Food with Varied Meat Product Ingredients – Annex II**, which replace previously CFIA issued letters of exemption which expired on November 30, 2013, as well as for new products.

NOTE: The following foods containing insignificant quantity of meat products that do not require attestation process:

- 1. Foods, other than meat products, fried in rendered animal fat:**
 - potato chips, french fries, onion rings fried in animal fat**
 - donuts fried in animal fat**
 - snack foods such as mushrooms, dill pickles, jalapeno poppers fried in animal fat**
 - fish products, such as fish and chips, fried in animal fat**

- 2. Bakery products in which the only meat product is rendered animal fats**
 - cookies and cakes with lard/tallow**
 - breads, buns, pretzels with lard/tallow**
 - candy/confectionary items**
 - plum pudding, mincemeat**

- 3. Dairy-based dip/salad dressings with meat flavouring**
 - salad dressings or dips, such as ranch dressing with bacon flavour**

- 4. Capsules, tablets and retail size containers of liquid and powder-concentrates, containing meat or meat by-products that are intended and labelled for sale as pharmaceuticals or pseudo pharmaceuticals rather than as food products.**

Attestation can be used for foods that:

1. Contain 2% or less of meat products as imported, or
2. Are retail ready, consumer size single use packages that contain more than 2% of meat products as imported however, will be diluted to 2% or less by the consumer as directed by the preparation instructions on the label.

NOTE: Previously CFIA issued letters of exemption for foods with a meat product content over 2% “as imported” and not falling into category 2 above will expire on **September 30, 2014**. These types of foods not covered by previously CFIA issued letters of exemption will have to be imported according to section 9 of the *Meat Inspection Act*.

Annex I - Attestation must be completed for each imported shipment and presented to the National Import Service Centre (NISC) along with other applicable documentation as indicated in Automated Import Reference System (AIRS).

Annex II - Example Calculation for Food with Varied Meat Product Ingredients must be completed for each imported shipment and kept on file and available for CFIA upon request

2. Background

Detailed information concerning import of meat products can be found in:

Meat Inspection Act available at: <http://laws-lois.justice.gc.ca/eng/acts/M-3.2/>

Meat Inspection Regulations 1990 available at: <http://laws-lois.justice.gc.ca/eng/regulations/SOR-90-288/index.html>

Chapter 10 of the Meat Hygiene Manual of Procedures available at:
<http://www.inspection.gc.ca/food/meat-and-poultry-products/manual-of-procedures/chapter-10/eng/1336189502007/1336258079585>.

AIRS available at:

<http://www.inspection.gc.ca/food/imports/airs/eng/1300127512994/1326599324773>

3. Artificial Flavours

Foods that contain only artificial meat flavoring are not considered meat products therefore **no attestation is required** for processing import of such food.

4. Food containing beef

Beef must originate from countries of negligible risk for BSE (**category 1**) to be considered for this exemption.

Meat Inspection Regulations 1990 section 3(1.1) The exemption established in paragraph (1)(i) does not apply to a food that is, that contains or that is derived from specified risk material in any form that originated in a country, or a part of a country, other than a country or part of a country that is designated under section 7 of the [Health of Animals Regulations](#) as posing a negligible risk for Bovine Spongiform Encephalopathy.

Note: Regarding bovine spongiform encephalopathy (BSE), at this time, Canada only accepts the World Organisation for Animal Health (OIE) categorizations of [BSE risk status](#) of member countries.

5. Foods in which the only meat product is rendered animal fat, broth or meat extract or any combination thereof used as a flavoring and not exceed 2% by weight of the product when ready for consumption

For these types of products, i.e. soup mixes, the 2% level is calculated when the product is cooked and ready to serve. To qualify for this exemption, the meat content in the food must only contain meat products that have been “processed” and no longer distinguishable as meat.

Annex II, Example Calculation for Food with Varied Meat Product Ingredients must be completed and kept on file and available for CFIA upon request.

6. Foods containing 2% meat product or less, calculated on the basis of the cooked weight of the meat product, i.e. as manufactured

If the food contains meat ingredients, i.e. dehydrated meat, mechanically separated meat, non rendered fat, bacon etc., the calculation for exemption is based on the total content of all the meat ingredients in the food including the fat, extract and broth as manufactured or sold.

All meat ingredients must be included in this calculation including the rendered fats, extracts and broths as outlined in section 5. For example, a dehydrated soup mix containing 1% meat extract, 1% fat and 1% bacon bits would not be exempted as the total meat product ingredients in the soup mix adds up to 3% as manufactured/sold.

7. Labelling requirements.

All products imported to Canada must meet Canada's *Food and Drug Act and Regulations* and labelling requirements regardless of the exempted status from the *Meat Inspection Act*.

More information on the *Food and Drug Act and Regulations* and the CFIA's Guide to Food Labelling and Advertising can be found through the CFIA website at www.inspection.gc.ca .

[ON LETTERHEAD]

Date: _____, 20____.

ATTESTATION

(FOR FOOD IMPORTED WITH AN INSIGNIFICANT QUANTITY OF MEAT)

I, _____, the importer of the products described below, do hereby certify that the information provided on this form is complete, correct and accurately describes the products contained in the shipment.

By signing this attestation, in the case of food products with an insignificant quantity of meat, I affirm that I have read the "**Regulatory requirements for imported food with an insignificant quantity of meat product(s) imported into Canada**", and the products described on this form contain an insignificant quantity of meat as per the guideline.

If food contains beef, I confirm beef originates from a negligible risk country for Bovine Spongiform Encephalopathy (BSE).

I understand CFIA will be conducting spot checks on food products with an insignificant quantity of meat to confirm food products meet requirements of this provision. Records proving compliance shall be made available to the CFIA inspector upon request.

I understand the exemption is from section 9 of the Meat Inspection Act - and that all other applicable legislation, including the Food and Drug and Health of Animals Act and Regulations apply

PRODUCT CODE	PRODUCT DESCRIPTION	END-USE (further processing retail ready/HRI)	UPC CODE FOR RETAIL PRODUCTS

Should you have any questions on this matter, please contact the undersigned (or specify other party showing name, title and contact information).

Sincerely,

NAME:

TITLE:

PHONE NUMBER:

COMPANY NAME:

BUSINESS NUMBER:

TRANSACTION NUMBER:

Calculation for Food with Varied Meat Product Ingredients

Note: other forms of calculations are acceptable as long as calculations are applicable to the “type” of meat ingredient and reflect total meat ingredient content in the final food product.

Product = Instant Noodles 50g package	
Ingredient	Percentage
Noodles	75
Dehydrated vegetables	20
Rendered chicken fat	2
Chicken extract	2
Dried chicken	1
TOTAL	100
Directions: Add the full 50 g package to 200 mL of water	

Calculation for this exemption is based on the total content of all the meat ingredients in the food

Calculate each meat ingredient separately based on the type:

- 1) 200 mL = 200 g
- 2) Rendered chicken fat (one of the 3* so it is diluted)
 2% of 50 g = 1 g of rendered fat in the product.
 Percentage of rendered fat in the final product as consumed = $1 \text{ g} / (50 \text{ g} + 200 \text{ g}) = 0.4\%$
- 3) Chicken extract (one of the 3* so it is diluted):
 Same calculation as rendered fat = 0.4%
- 4) Dried chicken - not one of the 3 highly processed ingredients therefore amount taken as sold with no dilution, this value **stays 1%**
- 5) **Total meat content = 0.4 + 0.4 + 1 = 1.8%** which is less than 2% therefore it is currently considered exempted under section 3.(1)(i) of the MIR.

*Reminder: Rendered Fat, Meat Extract and Meat Broth are the only ingredients that are calculated with dilutions (if any), i.e. as consumed. All other meat ingredients are considered as sold. The calculation for exemption is based on the total content of all the meat ingredients in the food including fat, extract, and broth (e.g. rendered fat + meat extract + broth + bacon + chicken). When a meat product previously exempted is used as ingredient in another meat product, e.g. a flavouring preparation, the meat content of that exempted product must be added into the total content of meat ingredient.

***It is recommended you keep a copy of this declaration on file as proof product exempted under the MIA as presented to CFIA at the time of importation into Canada**