# Trans-shipment (aka Forwarding/Re-export) Requirements for animal products and by-products legally imported into the United States from a third country and exported to Canada

This document provides guidance on Canadian Food Inspection Agency (CFIA) import requirements for animal products and by-products originating in a third country, legally imported into the United States (US), and then re-exported to Canada. This scenario is considered a **trans-shipment** by the CFIA, where:

**Trans-shipment** means a movement of commodities from the **country of origin** to a country of destination (in this case Canada) where the goods pass through an intermediate country (in this case the US). The shipment legally enters the intermediate country, and a portion of the original cargo is then shipped from the intermediate country to the country of destination.

## Country of origin means:

- the country in which the animal product or animal by-product was taken from an animal, or
- for an animal product or animal by-product (other than meat) that has undergone processing that would prevent the introduction of any diseases of concern, the country in which the product or by-product underwent that processing

Products that are repackaged in the United States, but do not undergo any further processing that would change the animal health status of the product, must meet the same requirements as products that are trans-shipped.

The <u>Automated Import Reference System (AIRS)</u> is an electronic database of import conditions for food, plant, and animal commodities regulated by the CFIA. However, the import conditions in AIRS apply only to direct shipments of commodities from the country of origin to Canada unless otherwise specified.

The requirements for trans-shipment below do not apply to animal products and by-products that undergo processing in the United States sufficient to change the animal health status of the product. For commodities that have undergone such processing, the **country of origin** is the United States and import requirements for product from the United States apply.

In addition, the requirements below do not apply to shipments of edible meat for human consumption.

# Determination of import requirements by commodity type

Locate the commodity of interest in the <u>Automated Import Reference System (AIRS)</u> and determine if it is eligible for export to Canada directly from the country of origin.

#### **Ineligible commodities**

If the product is listed as "refuse entry" for direct export from the country of origin to Canada, then it is not eligible for trans-shipment through the United States to Canada

#### **Eligible commodities**

a) **Commodities requiring a CFIA import permit when trans-shipped through the US** Rendered materials, commodities with multiple animal origin ingredients, commodities posing a higher risk of transmission of foreign animal diseases, commodities that do not meet the requirements in part b) below, and commodities that are not listed as safe commodities for Bovine Spongiform Encephalopathy (BSE) by the WOAH require an import permit for entry into Canada. This process allows CFIA to carry out a risk assessment and determine whether import is permitted. If the application for an import permit is successful, the conditions to be certified by USDA will be listed in the import permit. The import permit must be issued before the shipment is presented for entry into Canada. Please refer to the CFIA <u>Centre of Administration</u> <u>for Permissions</u> for further information on applying for an import permit.

An import permit is required for trans-shipment of the following commodities:

- Rendered materials (processed animal proteins) and fertilizers containing rendered ingredients
- Pet food, treats, and chews
- Raw inedible products
- Bovine skulls
- Animal origin laboratory samples including blood products and tissue samples
- Raw manure

Based on the requirements of the Canadian import permit, it is the responsibility of the U.S. importer and exporter to coordinate with the exporter from the country of origin to request supplementary export certification, if necessary.

USDA APHIS may only endorse attestations that appear on official government documentation from the country of origin. If the government documentation for imported products for further export to Canada does not contain statements that meet the requirements of the Canadian import permit, USDA APHIS cannot endorse the corresponding <u>APHIS VS Form VS 16-4 export certificate</u>.

# b) Commodities not requiring a CFIA import permit when trans-shipped through the US

Single ingredient commodities that pose a low risk of transmission of foreign animal diseases do not require an import permit for entry into Canada, provided that the zoosanitary certificate issued by the **country of origin** for entry of the shipment into the US contains all information required in AIRS as if the commodity were imported directly to Canada. In order to enter Canada, the shipment must be presented with an APHIS VS Form 16-4 issued by the USDA certifying the standard conditions for trans-shipment listed in Appendix A, along with a copy of the zoosanitary certificate issued by the **country of origin** for entry into the US.

An import permit is not required for trans-shipment of the following commodities through the US:

- Milk and milk products
- Eggs and egg products

- Integumentary tissues (hides and skins, feathers, hooves, horns, antlers)
- Fertilizers containing processed manure but no rendered materials.

APHIS VS Form 16-4 with instructions are available on the <u>main IRegs</u> product export page. The individual certificates are below:

<u>VS Form 16-4</u> (pdf 130kb)

VS Form 16-4A (pdf 99kb)

Combined VS form 16-4 and VS form 16-4A - (pdf 192kb)

## c) Commodities with no requirements when trans-shipped through the US

For commodities where no zoosanitary certificate is required when that commodity is exported directly from the country of origin to Canada, no zoosanitary certificate endorsed by USDA-APHIS is required for trans-shipment through the US. For example, avian origin gelatin may be imported directly into Canada from any country with no zoosanitary certificate. As a result, no zoosanitary certificate from USDA-APHIS is required for entry into Canada when this commodity is trans-shipped through the US.

## Appendix A: USDA certification requirements for commodities not requiring a CFIA import permit

Each shipment must be accompanied by an ORIGINAL zoosanitary export certificate (VS 16-4) endorsed by a full-time, salaried veterinarian of the United States Department of Agriculture (USDA) that certifies the following:

1-The products for export to Canada originating from \_\_\_\_\_\_ were legally imported into the USA (citing the required import documents such as import permit or zoosanitary certificate number)

2-The products were not changed or processed in any way while in the USA (activities like packaging do not constitute processing)

3-The products for export to Canada were not cross-contaminated with any animal product or byproduct of lesser zoosanitary status while in the USA.