

Q&As related to: Export Notice 2000-10, Sanitation Requirements for the Export of Meat and Poultry Products to Mexico; and 2001-1, Mexico Reapplication Process

1. If an establishment does not comply with Export Notice 2000-10, is it eligible to export to Mexico?

No, establishments handling exposed meat or poultry products (raw or cooked) are required to comply with Export Notice 2000-10. The FSIS inspector or veterinarian should not sign export certificates for Mexico if the establishment does not comply with these extra sanitation requirements.

2. Does the establishment have to operate with all of the sanitation requirements listed in Export Notice 2000-10 in place even if they are not producing product for Mexico?

No, the establishment can choose to operate in "Mexico Mode," that is, the plant only meets these requirements when producing product for export to Mexico. But, if the plant chooses this option, they must be prepared to link specific production lots back to operation in the Mexico Mode. Production date or other special marking might be used. No container marking is necessary if the plant operates continuously in "Mexico Mode". A production line in a plant operating in "Mexico Mode" would also be acceptable if identity of the product is maintained and product does not pass through any other part of the plant.

3. What is the meaning of "sanitizers" in Export Notice 2000-10?

The requirement is for sterilizers or disinfectant stations.

4. Do 20 PPM sanitizer "dips" for knives, etc. satisfy the requirement for sanitizers?

No these dip stations are a sanitation aid but not equivalent to a 180 degree sterilizer.

5. The term "boning rooms" is referred to in Export Notice 2000-10. Do the sterilizer requirements also apply to poultry cut-up lines?

Yes, the requirements also apply to poultry cut-up lines.

6. What satisfies the requirement for sterilizing knives, etc.?

The intent of the Mexico requirement is for the reasonable availability of a means for disinfecting of such equipment. This is understood to be a 180-degree F. water sterilizer or a food grade chemical sanitizer. If it is desired to use a chemical sanitizer in lieu of a 180-degree sterilizer, then the chemical used must meet FDA regulations 21 CFR

178.1010 which describes food grade sanitizers. Antimicrobial chemicals are only effective as a disinfectant (the performance standard in this case) under certain concentration/duration combinations established by the chemical manufacturer. Plants choosing to use chemical sanitizers should be prepared to support the performance standard (disinfecting) as achieved by the conditions of use.

7. At what interval must knives, etc. be sterilized?

Mexico has not specified any particular interval. Some operators feel that knives, etc. should be sterilized at the beginning of each shift and after breaks. This a good manufacturing practice, but Mexico requires that sterilizers or disinfectant stations be available at all times during production of their product.

8. Is it necessary to place a sanitizer at each workstation?

No, sanitizers or disinfectant stations must be available for use when contamination of work utensils occurs.

9. Are plants supplying raw material to approved establishments required to satisfy these requirements and be on the Mexico eligibility list?

Yes, any plant handling the product must be approved for Mexico. This is a major change for some exporting plants, because previously there was no stipulation for the slaughter or intermediate plant to be approved. The new requirements force this conclusion, and therefore, exporters may be required to satisfy the FSIS official signing the export certificate that all plants handling the product are approved.

10. Can aprons be used to satisfy the requirement to cover street clothes?

Mexico's requirement is that street clothing cannot potentially contact product. The measures taken must assure no contact. If aprons do not completely cover street clothing, then the requirement is not satisfied.

11. Do cold storages need to be approved for Mexico regardless of whether or not they handle exposed product?

Yes

12. Do cold storage establishments and ID warehouses need to be concerned about these new requirements?

Cold storage warehouses need to be concerned about the requirements and comply as needed based on their handling of exposed product. Cold storage warehouses, as the applicant for the export certificate, have a responsibility to satisfy the FSIS certifying official that all prior handling establishments are approved and meet these requirements.

13. What determines whether a recently approved plant needs to be resubmitted during the 60-day reapplication period?

Very recent plant approvals which would have considered the requirements of Export Notice 2000-10 will be automatically included, if approved in 2001. All others must reapply.

14. Can plants that fail to reapply during the 60-day reapplication period be approved?

Yes, provided they meet the requirements, and submit a completed application to the FSIS Technical Service Center (TSC) through their District Office. These applications will be submitted to the Government of Mexico for approval during or after the 60-day period has expired.

15. Are plants still eligible during the 60-day reapplication process?

Yes, previously approved plants will remain eligible until the new plant list is compiled based on the applications received. After the new list is posted and sent to Mexico, plants that failed to reapply will be ineligible even though the plant may have been listed previously.

16. Can new plants apply during this 60-day reapplication period?

Yes, new applications from plants never on the Mexico list before received during the 60-day reapplication period will be submitted for approval according to the established process and will be automatically added to the new list when it is compiled.