

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

FSIS DIRECTIVE

9000.6

3/15/11

EXPORT CERTIFICATION OF EGG PRODUCTS FROM OTHER THAN OFFICIAL EGG PRODUCTS PLANTS

I. PURPOSE

This directive provides instructions to Inspection Program Personnel (IPP) for issuing FSIS Form PY-200, Egg Products Inspection and Grading Certificate, to accompany egg products intended for export from FSIS-inspected locations other than the official egg products plant that produced the egg products. This directive also provides IPP with guidance for issuing replacement certificates upon request by the applicant.

KEY POINTS

- *IPP may issue an FSIS Form PY-200 for egg products intended for export at an FSIS-inspected location other than the official egg products plant that produced the egg products*

II. [RESERVED]

III. [RESERVED]

IV. REFERENCES

FSIS Directive 5010.1, Food Safety Related Topics for Discussions During Weekly Meetings, 1/7/10

FSIS Directive 12,600.1, Revision 1, Amendment 2, Voluntary Reimbursable Inspection Services, 7/2/07

9 CFR 590.411

9 CFR 592.95(a)

9 CFR 592.410(b)

V. BACKGROUND

A. IPP may issue FSIS Form PY-200 upon request by an applicant for FSIS inspected and passed egg products. The FSIS Form PY-200 is a multiple purpose form. It is

used to certify the wholesomeness of egg products; to control the movement of egg products between official egg products plants for further processing; to certify that egg products have met voluntary specifications requirements; to submit certification samples for laboratory analysis; to control the movement of egg products to an off-premise freezer; and to certify egg products for export.

B. FSIS is working to harmonize the procedures that IPP use with respect to egg products for export with those used for meat and poultry products for export. IPP should be aware that the applicant can request that they issue an FSIS Form PY-200 for egg products intended for export at FSIS-inspected locations other than the producing egg products plants, and that all FSIS-inspected locations that intend to export egg products must have an examination room of sufficient size to enable IPP to reinspect egg products, have facilities for cleaning and sanitizing all reinspection equipment, and be maintained in a sanitary manner, as required by 9 CFR Part 592.95(a).

VI. DEFINITIONS

Applicant: The person or company requesting an FSIS Form PY-200 for export purposes.

Container reinspection: Visual reinspection of shipping containers of inspected and passed egg products intended for export to detect any change in wholesomeness indicated by the appearance of containers.

Consignee (receiver or buyer): The person or company within the country of destination or member state that will take possession of the exported products upon arrival.

Consignor (shipper or seller): Usually the owner of the egg products intended for export or the person or company that has contracted with the importer to provide the products and all required documentation.

FSIS-inspected location: Any facility that stores egg products produced by official egg products plants, is approved for FSIS identification or certification services, and has an examination room that meets all sanitary requirements.

Official egg products plant: Any plant in which the plant facilities, methods of operation, and sanitary procedures have been found suitable and adequate by the Administrator for the continuous inspection of egg products.

Organoleptic inspection: Visual and sensory (smell) evaluation of inspected and passed egg products intended for export by IPP trained in egg products inspection using established criteria for characterizing the condition of egg products.

In lieu of certificate: A certificate replacing an original certificate.

VII. RESPONSIBILITIES

A. The District Office (DO):

1. Reviews the applicant's request to export egg products from an FSIS-inspected location other than an official egg products plant for completeness and accuracy.
NOTE: The request must be presented on company letterhead;
2. Reviews documentation (e.g., laboratory testing results) accompanying the request to verify that all importing country requirements identified in the Export Library and all FSIS regulatory requirements are met;
3. Notifies the applicant in writing of the decision to accept or reject the request to export; and
4. Notifies and sends copies of all documentation pertaining to the egg product intended for export to the Frontline Supervisor (FLS) for the FSIS-inspected location.

B. The FLS:

1. Assigns IPP to perform a container reinspection;
2. Sends copies of all documentation pertaining to the egg product intended for export to IPP at the FSIS-inspected location; and
3. Instructs IPP to bill the applicant for the voluntary service. IPP are to review FSIS Directive 12,600.1, Revision 1, Amendment 2, for instruction on documenting voluntary services.

C. IPP are to:

1. Verify that the shipping container labels and immediate container labels have all of the required FSIS regulatory labeling information required by 9 CFR 590.411;
2. Verify that the shipping container labels and immediate container labels meet all of the importing country labeling requirements contained in the Export Library;
3. Visually inspect the exterior of the containers on the pallets for signs of temperature abuse or other damage that could indicate poor handling or storage of the egg products; and
4. Request additional information or documentation from the applicant if further information is needed.

NOTE: All application requests and supporting documentation may be sent via fax or e-mail.

VIII. CONTAINER REINSPECTION

A. When a container reinspection reveals that the overall condition of the containers is unacceptable (e.g., leaking, exposed product), IPP are to:

1. Retain the egg products intended for export until the wholesomeness of the egg products can be evaluated by organoleptic inspection;
2. Provide container reinspection information to the applicant by memorandum of interview (MOI). IPP are to review FSIS Directive 5010.1 for instructions on issuing an MOI <http://www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/5010.1.pdf>; and
3. Inform the applicant of his or her right to appeal any inspection decision. The applicant should submit the appeal to the DO as stated in 9 CFR Part 592.410(b). IPP are to inform the applicant that the appeal needs to be submitted on company letterhead.

B. When a container reinspection reveals that there is isolated container damage:

1. IPP may approve requests to remove damaged containers from the export consignment. IPP are only to accept the request if it is presented on company letterhead by the applicant.
2. IPP may approve the egg products for export provided that the applicant removes all damaged containers from the export consignment.
3. The DO may give permission to transport damaged containers of egg products to an official egg products plant to be reworked, provided the egg products are transported under USDA/FSIS seal. The DO is only to consider the request to transport damaged containers to an official egg products plant for rework if made by the applicant on company letterhead.

C. When container reinspection finds that the condition of the containers acceptable, IPP may approve the remaining containers of egg products for export.

IX. ISSUING AN FSIS FORM PY-200 FOR EGG PRODUCTS INTENDED FOR EXPORT FROM AN FSIS-INSPECTED LOCATION OTHER THAN AN OFFICIAL EGG PRODUCTS PLANT

A. IPP are to complete an FSIS Form PY-200 for shipments of egg products intended for export from an FSIS-inspected location other than an official egg products plant, along with any additional certificates required by the importing country.

B. If the shipment for export arrived at the FSIS-inspected location accompanied by an FSIS Form PY-200 **for wholesomeness** that was issued by the producing egg products plant, the following statement may be typed in the “Remarks” section of the new FSIS Form PY-200 issued for export at the FSIS-inspected location:

The egg products were inspected on date (dd/mm/yyyy), at plant (insert egg products plant number), and the organoleptic examination was made at the producing egg products plant and documented on the FSIS Form PY-200 number PEB (insert number)_____.

1. A shipment of egg products intended for export may arrive at an FSIS-inspected location accompanied by an FSIS Form PY-200 for wholesomeness when that location has requested that the entire shipment be accompanied by the FSIS Form PY-200. The FSIS-inspected location may then ask for permission to sub-lot the original shipment into smaller lots for export to different countries. If the original shipment is sub-lotted, then the lot represented by the original FSIS Form PY-200 no longer exists. However, the new FSIS Form PY-200 for each sub-lot may bear the statement above.
2. IPP must remember that FSIS-inspected locations that provide multiple types of services may receive shipments of egg products intended for export that are still “in-process” and are therefore not eligible to be distributed in commerce until they have received final inspection in accordance with 9 CFR part 590. One such location is an approved off-premise freezer. Any FSIS Form PY-200s accompanying shipments of egg products intended for export at these locations and under these conditions are not certificates of wholesomeness and may not bear the statement above. The inspector conducting a final inspection in accordance with 9 CFR part 590 is responsible for issuing the FSIS Form PY-200 for the shipment or shipments of egg products intended for export.

C. If the importing country does not require that a Public Health Veterinarian (PHV) sign the FSIS Form PY-200, IPP may sign the certificate.

D. IPP are to review the documentation for meeting the requirements of the importing country as found in the Export Library before signing FSIS Form PY-200.

E. If a PHV’s signature is required by the importing country, IPP are to forward the following documentation to the PHV designated by the FLS to sign export certificates:

1. A copy of the applicant’s letter of request;
2. The FSIS Form PY-200 for export; and
3. Other certificates or documentation required by the importing country.

F. The PHV designated by the FLS is to review the documentation provided by the applicant that is needed to meet the requirements of the importing country that are found in the Export Library.

1. If the PHV finds that all of the documents are present and fully completed, the PHV is to sign and date the FSIS Form PY-200.
2. If the PHV finds that all of the documents are not present or are not fully completed, or the PHV has additional questions, the PHV is to contact IPP at the FSIS-inspected location where the container re-examination was completed.
3. The PHV is to sign FSIS letterhead certification specified in the individual importing country's requirements, which are set out in the Export Library, provided that the PHV finds that the documentation supports the applicant's claim that the importing country requirements have been met.
4. The PHV is to send copies of the applicant's request to export egg products, the FSIS Form PY-200 issued for export, and any additional certification or supporting documentation to the IPP at the FSIS-inspected location where the container reinspection was conducted.

G. IPP at the FSIS-inspected location are to file the following documents in their official FSIS export file:

1. A copy of the applicant's request to export egg products;
2. A copy of the FSIS Form PY-200 issued for export; and
3. Copies of any additional certification or documentation required by the importing country.

H. IPP are to retain the records for the remainder of the calendar year in which the certificate was issued and for an additional 2 years.

X. REPLACEMENT FSIS FORM PY-200 FOR EXPORT

A. An FSIS Form PY-200 that is issued to replace an original FSIS Form PY-200 is a re-certification of the product's condition **at the time of the initial export certification**. A replacement FSIS Form PY-200 may be issued in situations such as, but are not limited to:

1. The original FSIS Form PY-200 did not contain required information;
2. The original FSIS Form PY-200 contains incorrect information;
3. The name of the consignee or exporter has changed; or

4. The original FSIS Form PY-200 has been lost.

B. IPP are not to honor a request to increase the container count or the total net weight of the egg products.

C. IPP are to review requests for a replacement FSIS Form PY-200. IPP are not to issue a replacement PY-200 unless it is accompanied by the original FSIS Form PY-200 issued for the egg products intended for export.

D. In the case that a PY-200 has been lost, IPP are not to issue a replacement certificate unless the exporter provides a letter of assurance to the certifying official stating that the certificate will be returned if found.

D. Egg products are determined to be wholesome at the time of export certification, and appropriate storage and handling procedures are expected to be used to maintain wholesomeness during storage and transportation. When IPP or PHVs issue a replacement FSIS Form PY-200, the "In lieu of" statement is to contain the date of issuance and the certificate number of the certificate being replaced. The final FSIS Form PY-200 needs to include the following statement in the "Remarks" section of the certificate: "Issued in lieu of FSIS Form PY-200 (previously issued certificate number) and "date issued" for the certificate that was previously issued.

XI. DATA ANALYSIS

FSIS is not collecting data in a format that is available for analysis. The Agency intends to collect data that can be reviewed once the Public Health Information System has been implemented.

Refer questions concerning this directive to the OPPD International Policy Division through *askFSIS* at <http://askfsis.custhelp.com>.



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