

# HOW TO DEVELOP AN EXPORT CERTIFICATION CONTROL PROGRAM

Exporting is a part of business growth and success. The development and implementation of an Export Certification Control Program (ECCP) plan will ensure that all exported product meets all regulatory requirements of Canada and the foreign country a business is exporting to. The Canadian Food Inspection Agency (CFIA) outlines eight elements of an ECCP plan:

1. Preventive Control Plan (PCP)
2. Exporting Roles and Responsibilities
3. Foreign Country Requirements
4. Product Compliance
5. Certification
6. Eligibility List
7. Inspection and Fees
8. Traceability

This fact sheet will explain each element and help companies develop their ECCP plan.

## 1. Preventive Control Plan (PCP)

As defined by the CFIA, a PCP is a written document demonstrating how food risks are identified and controlled. Some companies may be familiar with the Quality Management Program (QMP) or the Food Safety Enhancement Program (FSEP). These are examples of preventive control plans based on Hazard Analysis and Critical Control Point (HACCP) principles. If companies are requesting export certificates, they must have a PCP developed and implemented. For more information on PCP, please refer to the CFIA [website](#).

## 2. Exporting Roles and Responsibilities

The company will need to designate personnel within the organization responsible for the implementation and maintenance of the ECCP plan and documents. The designated individual(s) will be responsible for ensuring the product meets all requirements of the Safe Food for Canadians Regulations (SFCR) and all requirements of the foreign country. This individual will also be responsible for requesting certificates, providing export information, requesting replacement certificates, and implementing control measures, when applicable.

## 3. Foreign Country Requirements

The company must describe how they have determined the foreign country requirements. This could include:

- a. Requirements are outlined on the foreign country's website for the food commodity or in the **Food Export Requirements Library** on the CFIA website (Note: Exporters should confirm the requirements with the importer, CFIA does not assume any liability for the accuracy of this information).
- b. Requirements are provided by the foreign country's inspection body or their embassy/consulate/trade commission.
- c. Requirements are provided by the importer in the foreign country.
- d. Requirements are identified on the export certificates that are needed.

The foreign country requirements must be provided to CFIA to evaluate against Canadian standards to see if a mutually acceptable certificate can be negotiated if one does not already exist.

## 4. Product Compliance

The ECCP plan needs to describe how the product complies with the foreign country's requirements. If the product meets the SFCR and that is the requirement of the foreign country or equivalent, the company may refer to their PCP (refer to #1 above). It is the company's responsibility to ensure that requirements that exceed or differ from Canadian standards, or for which there is no Canadian standard, are met. A company may be eligible to export a food that does not meet the SFCR if the ECCP plan includes **other specific requirements**. The CFIA will not certify any product that was processed under unsanitary conditions or marketed in a fraudulent manner. Labelling, packaging, grading, standards of identity and net quantity activities must meet the SFCR.

## 5. Certification

The ECCP plan must outline the procedures for requesting certificates and replacement certificates. An export certificate is a type of official assurance that provides the foreign country with confirmation from the Canadian government (i.e., CFIA) that the product meets certain standards and requirements. Not all countries or products require them. If they are required, export certificates accompany the consignment to the destination country and are provided to the appropriate border agency of the destination country to allow the product to enter the country. CFIA will only issue export certificates for product still in Canada. The certificates must be requested before shipping the product; all products must be available for inspection by the CFIA.

There are several types of export certificates. The type of certificate required is determined by the foreign country. Some examples include:

- a. Health or Sanitary Certificate – Government-to-government certificates and include information on the country of origin of the product and ingredients; any treatment or other processes the product has undergone prior to export; the microbiological status of the product; and the product's health status (e.g., presence of certain animal or plant diseases in Canada).
- b. Inspection Certificate – Developed by Canada and attests that the product complies with Canadian standards. Consignments for countries or products with no known requirements may be issued an inspection certificate; however, they

are at commercial risk. Commercial risk means the exporter accepts that the CFIA certificate is given in good faith based on the exporter's written assurance that the product meets Canadian requirements. CFIA is not liable when the exporter accepts commercial risk.

- c. Certificates of Free Sale – Attests that the product originates from a manufacturer licenced to produce food for sale in Canada and/or for export; the product has been produced by a manufacturer in good regulatory standing with a food safety control plan and traceability system, and the product is safe for human consumption.
- d. Radiation Certificate – Government-to-government certificate that attests to the safe level of radiation in the exported food.

Some certificates can be requested online using **My CFIA**. If the certificate is not available online, the company will need to contact their **local inspection office**. When requesting a certificate, you may be required to provide CFIA with the following information:

<ul style="list-style-type: none"> <li>country of import</li> <li>recognized certificate type(s)</li> <li>location of the consignment</li> <li>date the consignment is available for inspection</li> <li>date the certificate is required (date of departure)</li> <li>total units and unit size of each lot in the consignment</li> <li>product description (size, grade, type)</li> <li>scientific name</li> </ul>	<ul style="list-style-type: none"> <li>consignee name and address</li> <li>consignor name and address</li> <li>registered establishments and establishment numbers that conducted activities to the product</li> <li>processing dates</li> <li>net weights</li> <li>product identification marks (production code)</li> <li>container and seal numbers</li> <li>transport information</li> </ul>
--	--

If a company requests a replacement certificate, they need to provide an explanation for the requested replacement. Reasons may include an administration

error, it was lost or damaged, the consignee of the product changed, or there is a change in the quantity of the product certified. The original must be returned to CFIA when possible. If there is a change in the country of destination for a shipment still in Canada, the product must comply with the new foreign country requirements.

The ECCP plan will also need to describe the procedures relating to the use of export stickers, stamps and seals and products shipped without an export certificate. The plan must describe the measures taken to ensure there were no known certification requirements for a product. If there are no known requirements, then the company may export at their own commercial risk. Meat products and shell or processed egg products must be certified.

## 6. Eligibility List

Companies should outline in their ECCP the foreign country's establishment eligibility requirements and how the company meets the requirements. This may include only sourcing raw material or product from a federally registered or licenced establishment that is on the list of eligible establishments, identifying the establishment on the list of establishments approved to export to the foreign country or by sourcing imported food from an establishment eligible to export to the foreign country.

Exporters must meet all CFIA requirements and/or those of the foreign country to be included on an export approval list. Exporters can submit a request with supporting documentation to CFIA. See the CFIA's **List of Eligible Establishments**. Information is available by country or food product sector.

## 7. Inspections and Fees

The ECCP plan should include the frequency and type of inspection required and the associated fees. For more information, refer to CFIA's **Fees Notice**. The ECCP plan should include how CFIA is notified before certain commodities are shipped and the foreign country's inspection requirements.

## 8. Traceability

The ECCP plan must outline how the company identifies and traces all certificates issued by the CFIA, the food product certified by each certificate and the status of the lots certified (in inventory or exported). Product must be traceable to the first shipping destination. If an export certificate was cancelled and replaced with a new one, the new certificate must be linked to the original certificate that was cancelled for traceability purposes. All documentation and records for exporting must be kept for a minimum of two years as per the Safe Food for Canadians Regulations requirements.

The following information must be maintained for each consignment certified by the CFIA:

<ul style="list-style-type: none"> <li>the country of import</li> <li>the certificate type(s) received</li> <li>the certificate number(s)</li> <li>description of the lots</li> <li>the scientific and common names of the food</li> <li>the method of production</li> <li>the name and registration/licence number of the establishment from which the food was sourced, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>processing/packing date(s)/codes</li> <li>the net weight of each unit</li> <li>the total net weight of the lots</li> <li>the storage conditions of the product</li> <li>the name and address of each person/company (consignee) receiving the food</li> <li>the date the CFIA signed the certificate</li> <li>the date the consignment was exported</li> <li>the mode of transportation and container number (e.g., by air, by ship)</li> </ul>
--	--

The ECCP plan must also reference the company's procedure for receiving, investigating and responding to customer complaints for exported product. This procedure must outline how the company determines if the product poses a hazard to the public and, if it does, how they notify the CFIA. The company must provide CFIA with the following information:

- the date and time the information was received
- the date and time the information was determined to be valid or not
- the date and time the CFIA was notified of the valid information
- the name, address and telephone number of the person who provided the information
- a description of the investigation conducted
- a description of the results of the investigation
- the actions taken by the exporter in response to a confirmed health and safety issue

Once the ECCP plan has been developed to include all eight elements, a company will be able to demonstrate to the CFIA that they have control measures in place to ensure the product destined for export meets all regulatory requirements of Canada and the foreign country.

## For More Information Contact:

**Perennia Food and Agriculture Inc.**

Phone: 902-956-3376

Email: [foodsafety@perennia.ca](mailto:foodsafety@perennia.ca)

## References

CFIA website, Preventive Control Plan - <https://inspection.canada.ca/preventive-controls/preventive-control-plans/eng/1512152894577/1512152952810>

CFIA Food Export Requirements Library – <https://inspection.canada.ca/exporting-food-plants-or-animals/food-exports/requirements/eng/1507329098491/1507329098850>

CFIA's Guide for Preparing an Export Certification Control Program Plan. <https://inspection.canada.ca/exporting-food-plants-or-animals/food-exports/export-certification-control-plan/eng/1527252923495/1527252981753>

My CFIA - <https://inspection.canada.ca/about-cfia/my-cfia/eng/1482204298243/1482204318353>

CFIA Local Inspection Office - Contact a Canadian Food Inspection Agency office by telephone - <https://inspection.canada.ca/about-cfia/contact-a-cfia-office-by-telephone/eng/1313255382836/1313256130232>

CFIA – Food export registers and lists - <https://inspection.canada.ca/exporting-food-plants-or-animals/food-exports/registers-and-lists/eng/1507261903791/1507261904290>

CFIA Fees Notice - <https://inspection.canada.ca/about-cfia/acts-and-regulations/list-of-acts-and-regulations/cfia-fees-notice/eng/1582641645528/1582641871296>