

Voluntary Report – Voluntary - Public Distribution

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Report Name: Canada Announces Details for Fall 2020 Import Requirements for US Romaine Lettuce

Country: Canada

Post: Ottawa

Report Category: Agricultural Situation, Vegetables, Agriculture in the News

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Report Highlights:

On September 13, the Canadian Food Inspection Agency (CFIA) released details for the re-implementation of additional import requirements pertaining to romaine lettuce, and products containing fresh romaine lettuce, from the United States. CFIA has updated the 2020 requirements to include a pre-harvest testing option. The additional import requirements will be in effect from September 30 until December 31, 2021.

Similar to the 2020 requirements, Proof of Origin is required indicating the state and county where the romaine lettuce was harvested, if the romaine lettuce is from outside of the Salinas Valley, California counties of Santa Cruz, Santa Clara, San Benito, or Monterey. If the romaine lettuce, or products containing romaine lettuce, are from the aforementioned four counties, the shipment must be accompanied by [CFIA Form 5961](#). This form attests that sampling was conducted per the temporary Safe Food for Canadians (SFC) licensing conditions. A Certificate of Analysis demonstrating that the product does not contain detectable levels of *E. coli* O157:H7 is also required. These requirements apply to any romaine lettuce, baby romaine lettuce, salad mixes containing romaine lettuce, etc. if the romaine is in a fresh state. If Proof of Origin does not accompany a romaine lettuce shipment to Canada, then an attestation of sampling and Certification of Analysis must be provided regardless of origin. Canada's requirement, that romaine lettuce grown in California must be handled by a certified member of the California (Leafy Greens Marketing Agreement) LGMA and romaine lettuce grown in Arizona must be handled by a certified member of the Arizona LGMA, remain in effect.

The 2020 requirements were in effect October 7, 2020 through December 31, 2020. Canada states that the requirements are being implemented once again as a result of recurrent *E. coli* outbreaks associated with these products in recent years.

The conditions to satisfy the Proof of Origin are:

- must be on the exporter's official company letterhead,
- must include the state and county where the lettuce was harvested,
- and must include the signature of the exporter and date of signing.

For 2021, CFIA is providing two options for a sampling protocol based on whether samples are taken for testing pre-harvest or post-harvest.

- Pre-harvest sampling:
 - Sample must be taken no more than 7 days prior to harvest.
 - A sampling lot is defined as a homogenous romaine lettuce crop subjected to homogenous agricultural conditions with a maximum size of 2 acres.
 - The minimum sampling requirement per sampling lot is 60 individual random sample units of 25g each for a total sample size of 1,500g per sampling lot.
 - This sampling approach is applicable for both field packed romaine and romaine which will undergo further processing prior to export, as long as the documentation on sampling and Certificate of Analysis from testing can be linked between the pre-harvest and post-processing product.
- Post-harvest/Finished-product sampling:
 - Sampling is completed after all processing and handling of the product is completed.
 - A sampling lot is defined as one type of romaine product with a maximum size equivalent to one truckload (20,400kg or 45,000 lbs).
 - The minimum sampling requirement per sampling lot is 60 individual random sample units of 25g each for a total sample size of 1,500g per sampling lot.

Testing for *E. coli* O157:H7 must be completed by an accredited lab that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement (MRA) and conforming to the requirements of ISO/IEC 17025:2017 for specific tests.

CFIA requires the following to be provided on the Certificate of Analysis demonstrating the product is *E. coli* O157:H7 negative:

- the date of sample collection
- the Certificate number
- the laboratory that analyzed the sample
- the client
- a product description
- the methodology
- the sample weight and number of units
- the test result
- the test date

More details on sampling and testing are available on CFIA's [webpage](#). Traceability, preventive controls and preventive control plans, and other Safe Food for Canadians Regulations requirements continue to remain in effect.

Attachments:

No Attachments.