

**Caribbean Poultry Association, Trinidad and Tobago**  
**Poultry & Poultry Products Standards**  
**Comments Form Norman Boucher – CFIA**  
**February 12, 2003**

**CROSQ Poultry Standards:**

If possible, grading (quality) and inspection (health and safety) programs should be regulated separately. I noted that the document was inspired from the AMS/USDA Poultry Grading Regulations. The US and Canadian Poultry Grading Programs are considered equivalent and have been harmonized for trade purposes. In North America, the grading is performed by plant employees and the government is responsible for ensuring that the grading accuracy of the industry is acceptable by conducting regional and national audits. Like in the US, our grading regulations called Livestock and Poultry Carcass Grading Regulations (LPCGR) have been made under an act and this piece of legislation seems to be missing in the CROSQ document. An act is required in order to have the authority for establishing standards, taking samples and monitoring, putting product under detention, etc..

Two fundamental definitions are also missing with respect to "grader" and "grader designation". To ensure that the products are graded in a reasonable manner, at a minimum, your government/agency graders should be certified using a solid written and practical test. Ideally, plant graders would also be certified using a more basic written and practical test. This would facilitate the implementation, understanding and grading accuracy of your program during the introduction period and the following months.

2.31 poultry ...goose and guinea are missing and not in line with 2.32

2.34 should read necks and backs

2.36 pullet...should revoke this term. Normally used for live young laying birds before they reach their sexual maturity.

2.46 age factor not consistent with 2.51

6.0 sampling... FYI contrarily to the USA, in Canada we try to avoid putting our sampling plans and tolerances in our Regulations because it is so simple to amend a policy in a manual rather than amending a Regulation. A grading manual will be required inevitably to further explain the section of the regulations ( grades, monitoring, plant rating/audits, detentions, certification for exports and labeling). USDA and CFIA have very different monitoring systems for poultry grading. USDA has resident graders in most plants and conducts hourly grade checks. CFIA has a Frequency of Inspection Level (FOIL) system based on plant grading accuracy and the corresponding ratings ( AAA to F ) determine the required number of either weekly or monthly verifications.

#### 7.2 Commercial Grades

FYI, in Canada we also have three grade names and they are Canada A, Canada Utility and Canada C (all must be shown inside the outline of a maple leaf). Our last grade, Canada C is no longer use because in 1995 we introduced a voluntary grading program that was 100% cost recovered. Our second grade, Canada Utility, is very popular especially for heavier chickens and all turkey sizes because of the financial savings at retail. The term "utility" is well perceived by our consumers and our processors can easily sell top quality carcasses with minor aesthetic defects.

7.6.4 typo...should read the carcass or part

#### 9.2 label information

Giblets, kidneys - the possible presence of these organs inside the body cavity is not addressed. The terms "With Giblets" and "May contain Kidneys" should be required on the labels.

Basting, a definition is required if you do it. Canada allows a maximum of 3 % either butter, margarine, vegetable oil and the label should say "Graded before basting" when the product has been basted.

Minimum height of letters on label. This should be regulated at least for your grade names.

Other comments on CROSQ Document:

Over grading...7.8.1 takes care of over grading in your C grade by preventing that the grades A and B be allowed in your grade C. Over grading by packing grade A birds in your B grade category has not been prevented. The purpose of establishing a grading program is to provide an orderly marketing of graded poultry products. If a processor voluntarily decides to pack grade A birds in grade B containers, this processor will soon create an unfair market system.

National trade marks

A national trade mark or legend will have to be created and made available to plants where grading will be performed. The application, use, marketing and possession of similar trade marks, or legends or any combination that resembles those trade marks need to be prohibited.

Superiority to established grade names

No label should be marked with any word or words declaring or implying that the processed poultry is superior in quality to the grade marked on the label. (e.g. if your top grade is "Caribbean A", nobody should be allowed to say "Best Caribbean A Chickens" or "Best A Chickens on the island"...however a processor called Sunrise Poultry could say "Best Sunrise Poultry Caribbean A Chickens". Again, this superiority clause should be regulated.

Breast Tags

For your consideration, plastic breast tags are required in Canada for all graded whole birds that are not sold prepackaged or individually wrapped. These breast tags must have on them the grade name, the common name, name and address of the processor, giblets/kidneys declarations if required and are applied with an air gun at the plant. Birds that are sold to restaurants and deli counters for BBQ in groceries do not have to be tagged.

Partially eviscerated Poultry (New York Dress)

Is permitted in Canada and USA but under certain grading conditions, will you allow it?

Trade (Import/Export)

Since you will impose conditions and restrictions on your industry I am sure you will want to require the same on imported graded poultry from foreign countries. (Grading certificates, approved and equivalent grading programs from foreign countries)

Packing

Additional basic requirements should be required for packaging materials such as strong enough to protect the content, clean and free of discolorations and odors, be cleaned and disinfected before reuse

Shrinkable material

If permitted for fresh and frozen product, standards and administrative tolerances will be required to ensure that graded birds will be packaged correctly. The size of the bag and form fitting practices are important aspects to produce a neat and compact consumer pack that will minimize bridging, ballooning, surface desiccation, freezer burn and the accumulation of free liquid/moisture on the carcass surface of the birds.

Opaque Packaging

transparent and/or opaque bags permitted?

Mixing of grades

Can birds of different grade names be packed together?

Statistics (slaughtering and grading volumes)

For administrative and marketing reasons, you may want to regulate the weekly submission of processing reports to a central agency

Mandatory Grading or Voluntary

A decision is required. The draft doesn't specify.

## **CARICOM's COMMENTS**

I agree with most comments made, especially with the adoption of the US or Canadian definitions. I do not understand why for value added products all meat should be derived from grade A birds. Canada has a voluntary poultry grading program since 1995 and our processors would not accept to grade their birds and have them monitored by CFIA in order to send them for deboning (actually they use ungraded birds). Before 1995, our poultry grading program was mandatory for whole birds and all three grades were used for further processing (FFP). What would happen to your good quality carcasses with a flat wing missing if they cannot be graded A and only grade A birds can be used for FFP ? Grading standards can be developed for value added products (e.g. boneless skinless breasts)

page 5 point no. 3.4.2.1 Bleeding

Although it is true that evisceration is the responsibility of a meat inspection program, your grading regulations can set precise conditions or requirements on carcasses before they qualify for grading. Our section 3.(16) and 3.(17) of our Livestock and Poultry Carcass Grading Regulations require that:

- (16) No grader shall grade an eviscerated poultry carcass unless
  - (a) the carcass is from poultry slaughtered in an establishment;
  - (b) the carcass has been inspected under the Meat Inspection Act or under an Act of the legislature of a province that provides for the inspection of processed poultry;
  - (c) the flesh or skin of a chilled carcass is not dried out;
  - (d) the carcass is not discolored from insufficient draining of blood;
  - (e) the carcass has no more than one heart, liver, gizzard and neck packed with it or inserted into it;
  - (f) the breast bone is intact, in the case of a chicken carcass weighing more than 900g
  - (g) the carcass has not been basted or stuffed; and
  - (h) the carcass meets the standards for a grade set out in Part VII.
  
- (17) No grader shall grade a partially eviscerated poultry carcass unless, in addition to meeting the terms and conditions of grading set out in subsection (16),
  - (a) the epidermis is removed from the feet and shanks;
  - (b) the toenails are removed;
  - (c) the head, if present, is wrapped; and
  - (d) the mouth, if present, is clean.

### **Overall Comment**

I think Robert that your group is making excellent progress with the written poultry grading standards for your program. The regulatory piece is shaping up and is certainly the most important part of the program but more work will be required for the preparation of a complete grading manual that will provide guidance to the industry and government officials during their training, certification and on going monitoring activities.

I hope this will be helpful to you.

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