

Voluntary Report – Voluntary - Public Distribution

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Report Name: Canada Reimplements Temporary Import Requirements for US Romaine Lettuce

Country: Canada

Post: Ottawa

Report Category: Sanitary/Phytosanitary/Food Safety, Vegetables

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Report Highlights:

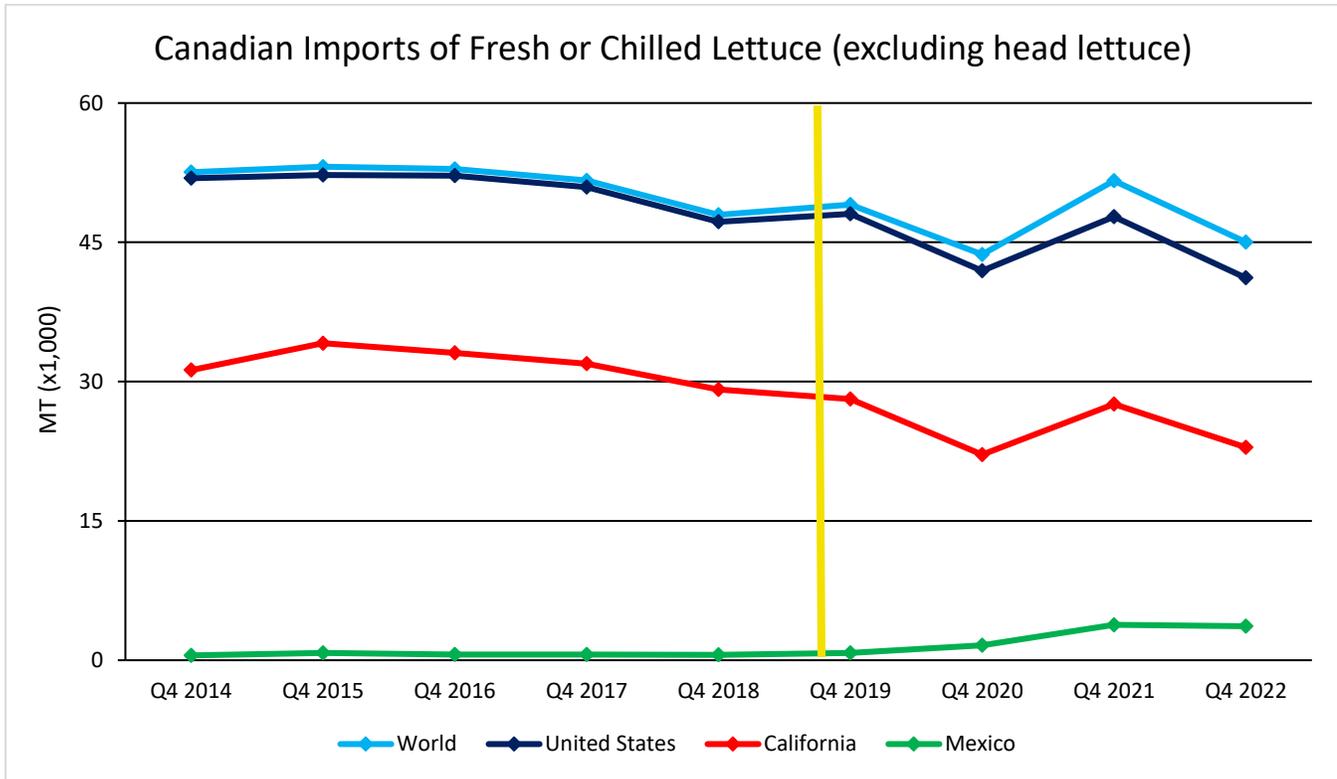
Canada will once again implement additional temporary import requirements for U.S. origin romaine lettuce for Fall 2023. The additional requirements will be in effect from September 28, 2023 to December 20, 2023. As with previous years' requirements, Canada will require imported romaine lettuce and/or salad mixes containing romaine lettuce originating from the Salinas Valley counties of Santa Clara, Santa Cruz, Monterey, or San Benito to have a negative test for E. coli O157:H7 or a Proof of Origin for romaine and/or salad mixes from other U.S. growing regions.

Since 2019, the Canadian Food Inspection Agency (CFIA) has implemented additional import requirements during the Fall period for U.S. romaine lettuce. Specific testing requirements for *E. coli* O157:H7 have been implemented since 2020 for romaine lettuce originating from the Salinas Valley counties of Santa Clara, Santa Cruz, Monterey, and San Benito. CFIA is once again implementing requirements for [Fall 2023](#) during the time period of September 28, 2023 to December 20, 2023.

Market Impact

Since 2019, the implementation of additional import requirements for U.S. romaine lettuce during the final quarter of the year has acted as a market disruptor, with Canadian importers and U.S. exporters challenged to implement the new requirements. In November 2019, CFIA issued a notice that imports of romaine lettuce from the United States must not come from lettuce harvested from the counties of Santa Clara, Santa Cruz, Monterey, and San Benito. In October 2020, CFIA's import requirements permitted imports from the counties of Santa Clara, Santa Cruz, Monterey, and San Benito with the completion of a negative *E. coli* O157:H7 test. These additional import requirements resulted in logistical challenges around sampling and diagnostic capacity, consumers and wholesalers reported higher prices, and were periodically challenged to source product. With potential threats to a consistent supply, wholesalers began seeking out additional suppliers.

Prior to 2019, the five-year average of fresh lettuce imports into Canada in Q4 was 51,640 MT, with the U.S. market share reaching 99 percent, 62 percent of which came from California. During the past four years, when additional import requirements were in effect, the average Q4 imports were 47,350 MT. During this time, the U.S. market share was down slightly averaging 94 percent with California dropping to 53 percent market share. The average Q4 volume from Mexico almost quadrupled in the 2019-2022 compared to 2014-2018, increasing from one to five percent. Imports of Mexican romaine to Canada in Q4 may be particularly advantaged if additional import requirements for U.S. origin romaine lettuce continue to be burdensome for importers.



Source: Trade Data Monitor, LLC. Imports are those included in HS 070519. Yellow line denotes CFIA implementation of additional requirements for U.S. romaine lettuce.

Fall 2023 Requirements

During this time, imports to Canada of U.S. romaine lettuce are required to be accompanied by a Proof of Origin confirming that any romaine lettuce and/or salad mixes containing romaine lettuce do not originate from the Salinas Valley counties of Santa Clara, Santa Cruz, Monterey, or San Benito. Should the romaine lettuce and/or salad mixes containing romaine lettuce originating from the Salinas Valley counties of Santa Clara, Santa Cruz, Monterey, or San Benito then CFIA requires testing for *E. coli* O157:H7 to confirm it is not detected in order for product to be import eligible. Importers will have a temporary condition on their Safe Food for Canadians (SFC) license for these [requirements](#).

The requirements remain similar to the 2022 requirements. For imports originating from the counties of Santa Clara, Santa Cruz, Monterey, or San Benito, importers must provide for a protocol in their preventive control plan outlining how they will implement the required sampling and testing. Each shipment must also have the completed attestation declaring that the appropriate sampling and testing was completed and *E. coli* O157:H7 was not detected in the shipment ([Form CFIA/ACIA 5961](#)). The official Certificate of Analysis for testing must also be included with each shipment.

CFIA provides for two approaches to fulfill the sampling requirements:

- 1) Finished-product sampling: sampling and testing is to be conducted before product is imported to Canada but is completed after all post-processing and handling steps are finished. A sampling lot

is defined as 1 type or product of a size no larger than 1 truckload (maximum 20,400 kg/45,000 lbs). Each sampling lot must have a total sample weight of 1,500 g comprised of 60 randomized individual sample units of 25 g.

- 2) Pre-harvest sampling: field sampling may be completed no more than 7 d prior to harvest. A sampling lot is defined as a 2 acre field or less. CFIA requires the field to be a homogenous romaine lettuce crop subjected to homogenous agricultural conditions. A total sample weight of 1,500 g comprised of 60 randomized individual sample units of 25 g must be taken from each sample lot. This option is primarily designed to accommodate field-packed product.

The CFIA [website](#) provides for additional details on sampling requirements and testing requirements, including accepted methodologies and laboratory accreditation requirements, which are required.

Attachments:

No Attachments.