TO:  Regional Directors  
      Federal-State Supervisors  
      Shell Egg Graders  

FROM:  Roger L. Glasshoff  
        National Supervisor, Shell Eggs  

SUBJECT: Trans-Loading of Shell Eggs Certified for Export

The following instructions have been developed to accommodate a request for trans-loading of shell eggs in compliance with export certification requirements, and to assure that all parties involved understand the trans-loading process, certification procedures, and expenses involved.

**Preparation for Trans-loading - Origin USDA Grader**

1. Upon notification from the egg processor of the proposed trans-loading of an export shipment of shell eggs, provide contact information to plant management for the Federal-State Supervisor responsible for grading activities at the trans-loading location (state) to plant management.

2. Assure that the production lot(s) of shell eggs certified for export are segregated in the cooler and identified in accordance with the labeling requirements for the identified foreign country. **The USDA Graded for Export Stamp will be applied to each shipping case of shell eggs at the time of trans-loading to the final container.**

3. Upon arrival of the transport truck trailer at the egg processing plant, inspect the sanitary condition of the trailer for the transport of human food, and verify that the refrigeration unit will function. Any unsanitary conditions observed will require rejection of the trailer. Similarly, if the refrigeration unit is not functioning, the trailer is unacceptable. The identified trailer may not be loaded until any unacceptable conditions, including the function of the refrigeration unit, are corrected.

**Responsibility - Egg Processing Plant Management**

1. Contact the Federal-State Supervisor responsible for grading activities in the geographical area of the trans-loading location providing approximate date/time and
location of the shipment. When possible, the origin USDA grader shall witness this contact (telephone or record of electronic message).

Failure to notify or provide adequate prior notice to the Federal State supervisor responsible for grading activities in the geographical area of the trans-loading location may result in delays to the shipment of product.

2. Provide the pre-addressed stamped envelope (addressed to the Grader-In-Charge at the origin facility) to the origin USDA grader (company is responsible for postage). Additionally, provide a large plain envelope to convey the certification documents on a pallet of product at the rear of the transport trailer.

3. Inform the transport driver that the shipping seal(s) must not be broken to transfer the product until a USDA representative is present to oversee the trans-loading activities. An ambient transport temperature of 45°F or less must be maintained in accordance with applicable Food and Drug Administration (FDA) regulations. Any violations of the ambient transport temperature will be reported to the FDA.

4. The company is responsible for electronically transmitting the completed Trans-Loading Certification Information Memorandum (Exhibit I) to the applicable Federal-State Supervisor responsible for the grading activities in the geographical area of the trans-loading location. When possible, the origin USDA grader shall witness this transmission (facsimile or record of electronic message).

**Certification of Shipment - Origin USDA Grader**

1. The USDA grader shall be present when the transport truck trailer is loaded to confirm the number of cases of shell eggs on the shipment.

2. Upon verification of the loading of the transport trailer, complete the Trans-loading Certification Information Memorandum (Exhibit I). The completed memorandum is to be provided to plant management to accompany Form PY-210S, Form PY-211, the applicable Disease Free Statements, the required foreign government documents (blue ink required), and the pre-addressed envelope provided by plant management for placement in the large envelope attached to a pallet of product at the rear of the transport trailer. A copy of the Trans-loading Certification Information Memorandum shall be retained in the origin USDA grader’s files (File 3a).

*The Form PY-211 worksheet must document the name and address of the recipient (consignee) in the destination country; the company or USDA shipping seal number(s) applied to the transport truck trailer at the origin egg grading facility; record verification that the refrigeration unit is functioning; and identify the Form PY-210S Certificate Number issued covering the shipment. The information on the Form PY-211 will be used as a record for the issuance of a new certificate at the trans-loading location if the information on the original certificate requires correction, such as the number of shipping cases.*

Page 2
05/22/2012
3. Complete the Form PY-210S, Shell Egg Grading Certificate, with the exception of the seal number(s) used to seal the transport trailer. Leave the seal number(s) for the final transport unit blank on the issued certificate. Caution must be taken when completing the export certificate. Errors (even though initialed with blue ink by the USDA grader), information that is not legible, and/or the failure to complete a field on the document has been cited by foreign government officials at the border inspection point as reasons for refused entry of a shipment.

4. One copy (not the original) of the Form PY-210S issued is to be retained in the origin grader’s files (File 3a). The remainder of the copies of the Form PY-210S issued shall be placed in the envelope as stated in item 2 above.

5. Upon verifying that the envelope including the referenced documents is secured to a pallet of product on the rear of the shipment, the trailer doors shall be closed and sealed with appropriate seals recorded on the Trans-loading Certification Information Memorandum.

**Responsibility – USDA Representative Assigned Trans-loading Activities**

1. Contact the National Billing Office to request assignment of a fee number for the applicant’s request for service (follow Regional Office guidance).

2. Assure receipt of the Trans-Loading Certification Information Memorandum (Exhibit I). The trans-loading representative shall be provided a copy of the Trans-loading Certification Information Memorandum by the Federal-State Supervisor responsible for the geographical area of the trans-loading location prior to conducting the fee service. Assure the shipping seal(s) information corresponds with that recorded on the Trans-Loading Certification Information Memorandum (Exhibit I) faxed or electronically transmitted to the appropriate Federal-State Supervisor responsible for grading activities in the geographical area of the trans-loading location.

   If the origin shipping seal(s) is broken or missing, but the refrigeration unit is functioning, the USDA representative will verify all the information on the certificate to assure the information remains correct as stated on the PY-210S issued at origin. If the information is consistent with the certificate issued, the trans-loading of the product to an acceptable final transport container may continue.

3. The USDA representative is to verify the refrigeration unit on the final transport container is functioning. If the refrigeration unit is not functioning, the final transport container will be rejected. If an alternate acceptable transport container is not provided, notify the Federal-State Supervisor in the immediate geographical area to contact management at the origin processing plant to determine the disposition of the shipment. All documents must be retained by the USDA representative until the disposition of the shipment is determined.
4. Upon determining that the refrigeration unit is functional, observe the sanitary condition of the transport container (sea vessel or air container) for the shipment of food for human consumption. If the container condition is acceptable and the refrigeration unit is set to provide an ambient temperature of 45 degrees Fahrenheit, proceed with the trans-loading operation.

5. As the competent authority to certify exported shell eggs, the AMS grader is responsible for assuring the information stated on an export certificate is accurate, including the identity and number of cases shipped, the production code, and the export documents specified in the instruction for the declared country of destination. Errors or discrepancies on official documents can result in refused entry by officials at the foreign border inspection point.

Verify the actual number of cases to be transferred to the final transport container. If a discrepancy exists between the origin case count recorded on the shipping certificate issued and that observed at the time of trans-loading, the USDA representative shall contact the Federal-State Supervisor in the geographical area. The Federal-State Supervisor shall contact management at the origin processing plant to determine if another export certificate shall be issued. When another export certificate is issued stating the accurate case count, all copies of the original documents shall be returned to the origin USDA grader. All documents covering an export shipment must reference the certificate issued, including the Disease Free Statements.

When the information on the official documents accompanying the transport trailer corresponds with the USDA representative’s observations, the cases may be stamped (USDA Graded for Export with certificate number) and loaded on the final transport unit.

6. The seal(s) used to secure the doors on the final transport unit will be recorded on the export certificate issued. The seal number(s) must be legibly recorded in blue ink when completing the origin export certificate issued.

7. Complete and sign the export certificate issued, the Disease Free Statements and any required foreign government documents (blue ink required) accompanying the shipment from the origin egg processing plant.

Disposition of the Export Certificate and Accompanying Documents

1. Provide the original of the export certificate and the Disease Free Statements or other official export documents to the applicant or the egg processor’s representative coordinating activities at the point of trans-loading.

2. Place a copy of the completed Form PY-210S, and the amended Form PY-211, when applicable, in the pre-addressed stamped envelope for return to the USDA grader at the origin egg grading facility. The USDA representative completing the trans-loading is to maintain a copy of the issued certificate, Form PY-210S, and Form PY-211, if issued.
3. The USDA representative completing the trans-loading is to remind the applicant or the egg processor's representative that the original of each certificate issued must be presented to the officials at the point of entry to the destination country.

Ultimately, it is the responsibility of the exporter and management at the egg grading facility to take the necessary steps to ensure that the shipment is compliant with all export requirements applicable to the country of destination. The above instructions provide a uniform procedure for this type of fee service. Forward any questions relative to these instructions to this office.

Please provide a copy of this instruction to members of your Regional staff and State Shell Egg Coordinators conducting this type of fee service. The resident USDA shell egg grader shall provide a copy of this memorandum to plant management.

Attachment: Trans-loading Certification Information Memorandum, Exhibit I

File these instructions in E-01b, Exports, in the Supervisors/Resident Graders Shell Egg Index.
**TRANS-LOADING CERTIFICATION INFORMATION MEMORANDUM**

| Name of Federal-State Supervisor responsible for grading activities at the trans-loading location |
| Date/Time of scheduled trans-loading |
| Location of scheduled trans-loading (address) |
| Name and Address of the recipient (consignee) in the destination country |
| Record the company or USDA shipping seal number(s) applied to the transport truck trailer at the origin egg grading facility |
| Is the refrigeration unit functioning (If the refrigeration unit is not functioning, the shipment cannot be certified.) | YES | NO |
| Record the Form PY-210S, Shell Egg Grading Certificate number issued for the respective shipment |
| Signature/Date of USDA Grader |

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