



## **Trader Notice – BCPP 01/2021**

### **Trader Notice on changes to composite product import requirements**

The rules relating to Official Controls and health certification requirements for composite products are changing on 21 April 2021.

The requirements for the entry of composite products into the EU are no longer based on the percentage of ingredients of animal origin, but rather on the risks to animal and public health posed by the composite product.

#### **What is changing?**

##### **A. Changes to Certification**

Certain composite products that currently do not need a health cert to be imported to the EU will now need one. Other composite products that are exempt from certification will require a new document, called a 'private attestation'.

Composite products are now categorised based on risk into;

- Higher risk
  1. Composite products containing meat
  2. Non-shelf stable composite products
- Lower risk
  3. Shelf stable composite products

Composite products falling into the higher risk categories (categories 1&2) must be accompanied by a health certificate. Composite products falling into the lower risk category must be accompanied by a private attestation. A new model composite product health cert and a model private attestation are available in chapter 50 and Annex V respectively of [Commission Regulation \(EU\) 2020/2235](#).

A transition period applies if the composite product needs a health certificate for import to the EU under current EU rules whereby the existing composite product health certificate can continue to be used until August 2021. The new health certificate must be used if the composite product doesn't currently require a health certificate to be imported to the EU but will require a health certificate from April under the new rules. In that case, the option to use the old health certificate is not available.

The transition period does not apply to products which now require a private attestation where there were previously no certification requirements.



## B. Changes to Official Controls:

All composite products, except those in Table 1 below, will require official controls at the Border Control Post (BCP) of entry to the EU.

The importer of consignments of composite products must register with DAFM and on TRACES-NT. Guidance available at: [gov.ie - Trading in animals and animal products \(www.gov.ie\)](http://www.gov.ie)

The necessary documents and logistical information must be submitted 24 hours in advance via the Department's [Imports Portal](#) and a Common Health Entry Document (CHED-P) must be submitted on TRACES-NT.

Table 1: Composite products exempted from controls at the BCP<sup>1</sup>

CN codes (1)	Explanations (2)
1704, ex 1806 20, ex 1806 31 00, ex 1806 32, ex 1806 90 11, ex 1806 90 19, ex 1806 90 31, ex 1806 90 39, ex 1806 90 50, ex 1806 90 90	Confectionery (including sweets), chocolate and other food preparations containing cocoa that meet the requirements of Article 3(1)
ex 1902 19, ex 1902 30, ex 1902 40	Pasta, noodles and couscous that meet the requirements of Article 3(1)
ex 1905 10, ex 1905 20, ex 1905 31, ex 1905 32, ex 1905 40, ex 1905 90	Bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products that meet the requirements of Article 3(1)
ex 2001 90 65, ex 2005 70 00, ex 1604	Olives stuffed with fish that meet the requirements of Article 3(1)
2101	Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or mate thereof that meet the requirements of Article 3(1). Roasted chicory and other roasted coffee substitutes, and extracts, essences and concentrates thereof that meet the requirements of Article 3(1).
ex 2104	Soup stocks and flavourings packaged for the final consumer that meet the requirements of Article 3(1)
ex 2106	Food supplements packaged for the final consumer, containing processed animal products (including glucosamine, chondroitin or chitosan) that meet the requirements of Article 3(1)
ex 2208 70	Liqueurs and cordials that meet the requirements of Article 3(1)

<sup>1</sup> A composite product must be shelf-stable and not contain meat to qualify for an exemption from official controls at the BCP. These exempted products still require a private attestation which must accompany product to the point of placing on the market/warehouse/point of sale. Products containing dairy/egg products must meet the requirements of Article 162 of regulation (EU) 2020/692 [See Appendix]



**Decision Tree:**

The EU Commission have developed a decision tree to guide importers as to the rules applicable to their composite product - available [here](#)

**Further Information:**

Further information is available on the Commission’s website at the following link: [Commission guidance on Composite Products](#)

**Appendix:**

*Table 1: Risk-mitigating heat treatment for Dairy Products must be at least equivalent to those treatments listed in Column B [Annex XXVII of Regulation (EU) 2020/692]*

ANNEX XXVII  
RISK MITIGATING TREATMENTS FOR MILK AND DAIRY PRODUCTS

	A	B
Species of origin of the milk and the dairy products	<i>Bos Taurus, Ovis aries, Capra hircus, Bubalus bubalis and Camelus dromedarius</i>	<i>Other than Bos Taurus, Ovis aries, Capra hircus, Bubalus bubalis and Camelus dromedarius</i>
Animal health status of the third country	1. <i>Third countries not officially free of foot and mouth (FMD) for the preceding 12 months</i> 2. <i>Third countries where vaccination against FMD is practised</i>	Any
Sterilisation process, to achieve an $F_0$ value equal to or greater than 3	Yes	Yes
Ultra-high temperature (UHT) treatment at not less than 135 °C in combination with a suitable holding time	Yes	Yes
High temperature short time pasteurisation treatment (HTST) at 72 °C for 15 seconds applied twice to milk with a pH equal to or greater than 7,0 achieving, where applicable, a negative reaction to a alkaline phosphatase test, applied immediately after the heat treatment	Yes	No
HTST treatment of milk with a pH below 7,0	Yes	No
HTST treatment combined with another physical treatment by either: (i) lowering the pH below 6 for one hour; or (ii) additional heating equal to or greater than 72 °C, combined with desiccation	Yes	No
No: treatment not permitted Yes: acceptable treatment		



*Table 2: Risk-mitigating heat treatment for Egg Products must be at least equivalent to those treatments in Annex XXVIII to Regulation (EU) 2020/692*

ANNEX XXVIII  
RISK MITIGATION TREATMENTS FOR EGG PRODUCTS

**1. TREATMENTS OF EGG PRODUCTS FOR THE INACTIVATION OF HIGHLY PATHOGENIC AVIAN INFLUENZA**

The following treatments are suitable for the inactivation of highly pathogenic avian influenza in the following egg products:

Egg product	Treatment	
	Core temperature (in degrees Celsius (°C))	Duration of treatment (in seconds (s) or hours (hr))
Liquid egg white	55,6 °C	870 s
	56,7 °C	232 s
10 % salted yolk	62,2 °C	138 s
Dried egg white	67 °C	20 hr
	54,4 °C	513 hr
Whole eggs	60 °C	188 s
	completely cooked	
Whole egg blends	60 °C	188 s
	61,1 °C	94 s
	completely cooked	

**2. TREATMENTS OF EGG PRODUCTS FOR THE INACTIVATION OF INFECTION WITH NEWCASTLE DISEASE VIRUS**

The following treatments are suitable for the inactivation of infection with Newcastle disease virus in the following egg products:

Egg product	Treatment	
	Core temperature (in degrees Celsius (°C))	Duration of treatment (in seconds (s) or hours (hr))
Liquid egg white	55 °C	2 278 s
	57 °C	986 s
	59 °C	301 s
10 % salted yolk	55 °C	176 s
Dried egg white	57 °C	50,4 hr
Whole eggs	55 °C	2 521 s
	57 °C	1 596 s
	59 °C	674 s
	completely cooked	