

DAFM TRADER NOTICE VETIC- 01/2021

Subject: Important information regarding the export of composite products to GB from 1st October 2021, and through GB to the EU (via land-bridge) from 1st October 2021

To: All Food Business Operators intending to export composite products to GB from 1st Oct 2021 and through GB to the EU (via land-bridge) from 1st Oct 2021

From October 1st 2021, many agricultural and food products being exported from Ireland into Great Britain (GB) or transiting through GB by land-bridge to the EU will require an Export Health Certificate (EHC), including composite products.

This document is part of a series of guidance notes and resources provided to food business organisations and traders by the Department of Agriculture, Food and the Marine.

For further information on the resources available visit [Gov.ie – Agriculture and Brexit](https://www.gov.ie/en/agriculture-and-brexit/).

In this document you'll find information about;

1. Identifying a composite product Page 2
2. Which composite products require an Export Health Certificate Page 6
3. Composite products that do not require export health certification i.e. Derogated Products
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4. Further guidelines on how to apply for an EHC where applicable and how to complete the
required documentation. Page 16

Disclaimer:

Exporters should be aware that import conditions for composite products to GB may be amended due to changes in policy or legislation by GB, sometimes at very short notice. While every effort will be made to ensure this document is up to date it may not reflect current GB import conditions.

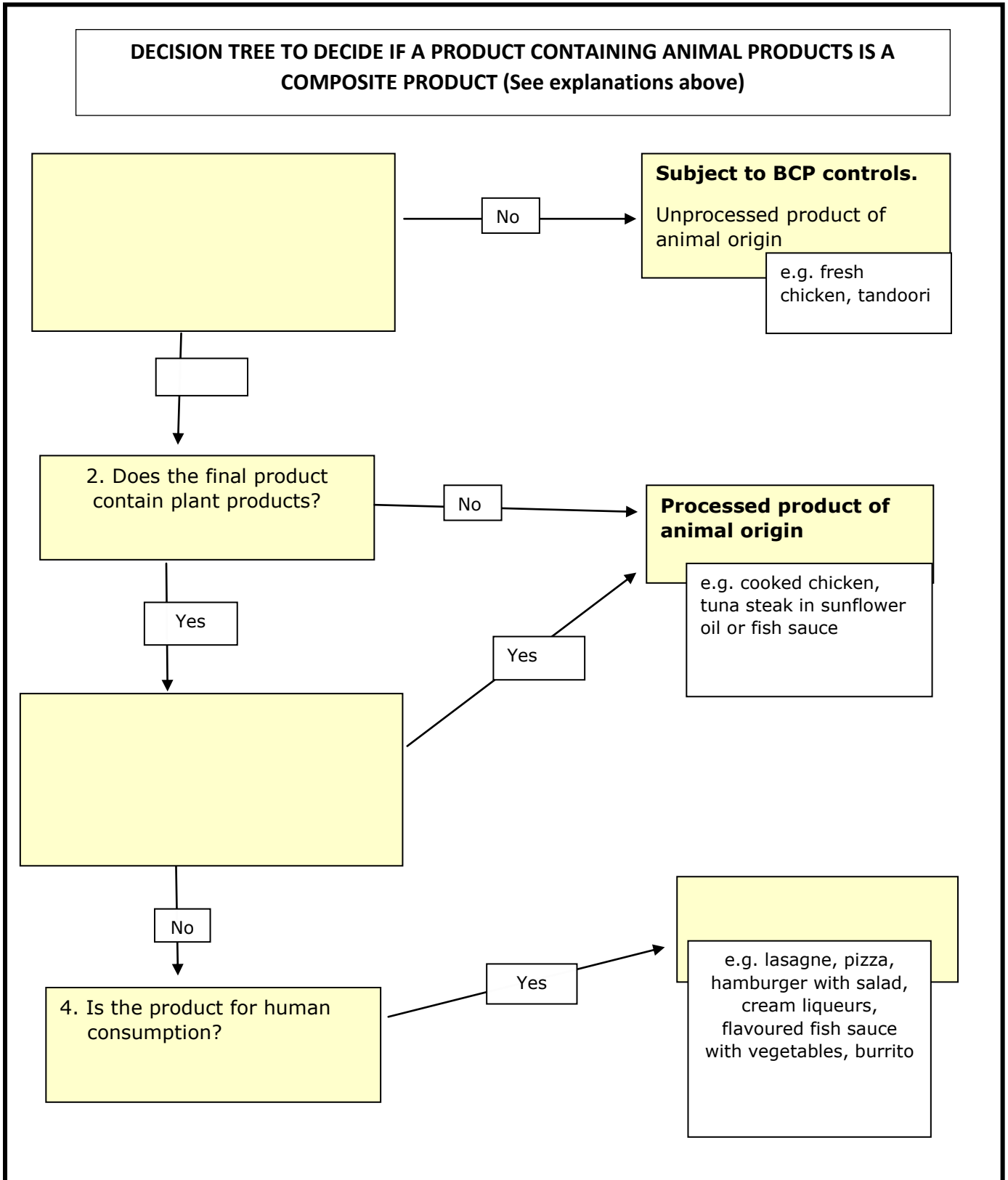
To ensure compliance with current import conditions we strongly suggest that exporters obtain full details of the current requirements from the veterinary authorities in GB in advance of exporting a consignment.

Exporters should note that the information given in this document relates only to animal health and public health conditions for export of composite products to GB or for transit through GB to the EU. It does not give guidance on other conditions that may need to be met.

While every effort is made to provide accurate and complete information it cannot be guaranteed that there are no errors or that it is completely accurate.

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Figure 1.1 Decision tree to identify composite products



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1. Definition of composite products

Composite Products are defined in Article 2(a) of Commission Decision 2007/275/EC <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02007D0275-20191214&qid=1621589712259> as “a foodstuff intended for **human consumption** that contains both **processed** products of animal origin and products of plant origin and **includes** those where the processing of primary product is an integral part of the production of the final product”. [Additional emphasis provided as an aid]

1.1 Identifying composite products

Please see figure 1.1 for decision tree (page 2 of this document)

Composite products must be for human consumption.

Composite products must contain both

- Products of animal origin which have been processed, and
- Products of plant origin which may or may not have been processed

Composite products may contain processed products of animal origin (PPOAO) along with unprocessed products of plant origin e.g. a cooked-chicken salad sandwich is a composite product.

Examples of composite products containing meat requiring export health certification

- Meat pie (containing cooked meat)
- Chicken curry (pieces of cooked chicken combined with vegetables in a sauce)
- Pot noodle containing meat powder

Examples of composite products containing dairy products requiring export health certification

- Pizza containing uncooked pasteurised cheese, because it is not shelf-stable (requires refrigeration), and the final product is not cooked.
- Gateau with a layer of pasteurised cream because it is not shelf-stable (requires refrigeration) and final product with cream in place has not been cooked.

Examples of fishery products requiring composite product export health certification

- Canned tuna salad (contains tuna combined with vegetables to make a salad)
- Prawn spring roll containing half or more cooked prawn

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What are processed products of animal origin (PPOAO)

Processing means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes

PPOAO include:

- Meat products (ham, salami, etc.)
- Processed fishery products (smoked fish, marinated fish etc)
- Dairy products (heat treated milk, cheese, yoghurt, etc.)
- Egg products (egg powder etc.)
- Rendered animal fat
- Greaves, Gelatine, Collagen
- Treated intestines, stomachs and bladders etc.

PPOAO also include:

- Combinations of processed products, e.g. cheese with ham
- Products that have undergone several processing operations, e.g. cheese from pasteurised milk.

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1.2 Excluding products which are not composite products

Composite Products cannot contain unprocessed product of animal origin, e.g. a BBQ skewer containing fresh meat and vegetables is a fresh meat product, not a composite product.

Products of animal origin without products of plant origin are not composite products, whether they are processed or unprocessed, e.g. raw steak with butter will require a fresh meat cert, not a composite product cert.

PPOAO containing a product of plant origin are not composite products if;

- The product of plant origin is used only to add special characteristics (flavour, sweetness, colour, texture) to the PPOA
- Or, when the product of plant origin is necessary for the manufacture of the PPOAO.

Examples of products which are not composite products:

- Dairy products: Yogurts with fruit, cheeses with herbs, or breaded cheese will require a dairy product certificate
- Fishery products: Canned fish fillet in oil, cooked mussels with garlic butter, fried battered fish will require a fishery product certificate
- Meat preparations: Chicken goujons, sausages with herbs or garlic will require a meat preparation certificate.
- Animal by-products: are not composite products (e.g. pet food is not a composite product).

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2. Composite products that require export health certification for entry to G.B., and for transit through GB to EU using the land-bridge, from 1st October 2021.

2.1 Composite products containing only meat products (including extracts, concentrates and powders)

Relevant export health certificates (EHC) for composite products

GBHC088E – for export to GB

GBHC089E – for transit through GB for export to the EU or storage

Composite product containing any processed meat product must be accompanied by the appropriate export health certificate (EHC) (Certificate GBHC088E for GB for transit to the EU or GBHC089E for storage) with all relevant sections completed for the meat products.

Examples of composite products containing meat requiring export health certification

- Meat pie (containing cooked meat)
- Chicken curry (pieces of cooked chicken combined with vegetables in a sauce)
- Pot noodle containing meat powder

2.1.1 Procedures for applying for export health certification for composite products containing only meat products (including extracts, concentrates and powders)

For a composite product containing meat products the food business operator (FBO) must provide the certifying officer with the following:

- a) If imported directly from a Third Country (i.e. non-EU country)
 - A copy of original Health Certificate (HC)
 - An original of the Common Health Entry Document (CHED)
- b) If imported from a Third Country and received from another EU establishment:
 - A commercial document detailing the species, country, treatment and approved establishment of origin that corresponds to the label and identification mark on the container/wrapping/packaging.
 - A copy of the HC and CHED should be available for verification
- c) For meat products processed in the EU, in addition to the commercial document,
 - an intra community health certificate may be sought.
- d) For meat products processed on site before or during incorporation into composite products,
 - treatment will be verified on site.

For meat products containing meat of bovine, ovine or caprine origin it is necessary to provide the country of origin of the meat contained in the meat product to facilitate BSE regional certification.

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The meat product(s) in the composite product(s) must come from a species and region listed in accordance with Decision 2007/777/EC Annex II. as 'treatment A'. This includes Ireland, G.B. and listed EU and Third Countries

Note: There are regions of EU countries from which certain processed products of animal origin cannot be used in the manufacture of composite products in Ireland. Check at the link [Annex II for EU countries](#).

Example of the information required for Meat products			
Species	Treatment A	Origin (country, region)	Approved Establishment No.
BOV	A	IE	IE123EC

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2.2 Composite products containing only milk/dairy products.

Relevant export health certificates (EHC) for composite products

GBHC088E – for export to GB

GBHC089E – for transit through GB for export to the EU or storage

Composite products containing milk/dairy products which require export health certification, must be accompanied by the appropriate export health certificate (EHC) (Certificate GBHC088E for GB or GBHC089E for transit to the EU or storage) with all relevant sections completed for the milk/dairy product.

Examples of composite products containing dairy products requiring export health certification

- Pizza containing uncooked pasteurised cheese, because it is not shelf-stable (requires refrigeration), and the final product is not cooked.
- Gateau with a layer of pasteurised cream because it is not shelf-stable (requires refrigeration) and final product with cream in place has not been cooked.

2.2.1 Procedures for applying for export health certification for composite products containing only milk/dairy products

Milk/dairy products must come from Ireland, GB, EU or a third country listed in ANNEX I 'column A' of Regulation (EU) No 605/2010 as amended. Therefore, no specific treatment is required, however, the raw milk must be treated or processed by one of the methods provided for in the EHC and the relevant treatment must be certified.

For a composite product containing milk/dairy products the FBO must provide the certifying officer with the following:

a) If imported directly from a Third Country

- A copy of Health Certificate (HC)
- An original of the Common Health Entry Document (CHED)

b) If imported from a Third Country and received from another EU establishment:

- A commercial document detailing the species, country, the range of production dates, heat treatment, and approved establishment of origin that corresponds to the label and identification mark on the container/wrapping/packaging.
- A copy of the HC and CHED should be available for verification

c) For milk/dairy products processed in the EU, in addition to the commercial document an intra community health certificate may be sought.

d) For milk/dairy products processed on site before or during incorporation into composite products treatment will be verified on site.

The milk must come from 'cows, ewes, goats or buffaloes' but it is not necessary to identify the species.

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Example of the information required for Milk/dairy products			
Country	Approved Establishment No.	Treatment	Production Dates
IE	IE1290EC	Pasteurised	30/01/2021 & 10/03/2021

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2.3 Composite products containing processed fishery products.

Relevant export health certificates (EHC) for composite products

GBHC088E	– for export to GB
N/A	– for transit through GB for export to the EU or storage

Composite products containing processed fishery products which require export health certification, must be accompanied by the appropriate export health certificate (EHC) GBHC088E for import to GB with all relevant sections completed for the fishery product. Composite product certification is not required for composite products containing fishery products transiting GB via land-bridge.

2.3.1 Procedures for applying for export health certification for composite products containing processed fishery products.

Fishery products must originate from Ireland, GB, EU or a third country listed in listed in Annex I or II of Commission Implementing Regulation (EU) 2019/626 and from an approved establishment. For processed fishery products the FBO must provide the certifying officer with documentation from the approved fishery processing establishment that corresponds to the label and identification mark on the container/wrapping/packaging of the fishery products.

Documentation showing whether the fishery products were aquaculture or wild origin must be available e.g. traceability via the 'lot' number required for a wild-fish landing or to aquaculture production. In the case of imported products, a copy of the catch certificate or indication of farmed origin e.g. IUU-exemption statement is required.

For queries relating to catch certification please contact the Sea Fisheries Protection Authority (SFPA) at www.sfpa.ie.

Example of the information required for Fishery products	
Country	Establishment approval No.
IE	IE1640EC

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2.4 Composite products containing processed egg products

Relevant export health certificates (EHC) for composite products

GBHC088E – for export to GB

GBHC089E – for transit through GB for export to the EU or storage

Composite products containing egg products which require export health certification, must be accompanied by the appropriate export health certificate (EHC) (Certificate GBHC088E for GB or GBHC089E for transit to the EU or storage) with all relevant sections completed for the egg product.

2.4.1 Procedures for applying for export health certification for composite products containing processed egg products.

Eggs used in composite products must originate from egg producer establishment(s) which are free from Highly Pathogenic Avian Influenza (HPAI). If the certifying officer can confirm that there has been no HPAI or Newcastle Disease at or within 10km of the egg producing establishment(s) for at least the 30 days prior to the date of issue of the EHC no further documentation will be required for certification.

Note: information on the location of the establishment(s) that produced the eggs used in the composite produce is necessary to permit export health certification of egg products.

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2.5 Composite products containing more than one type of PPOAO

Relevant export health certificates (EHC) for composite products

GBHC088E – for export to GB

GBHC089E – for transit through GB for export to the EU or storage

Composite products containing any mixture of processed meat, dairy, fishery, and / or egg products, which require export health certification, must be accompanied by the appropriate export health certificate (EHC) (Certificate GBHC088E for GB or GBHC089E for transit to the EU or storage) with all relevant sections completed for each of the products contained.

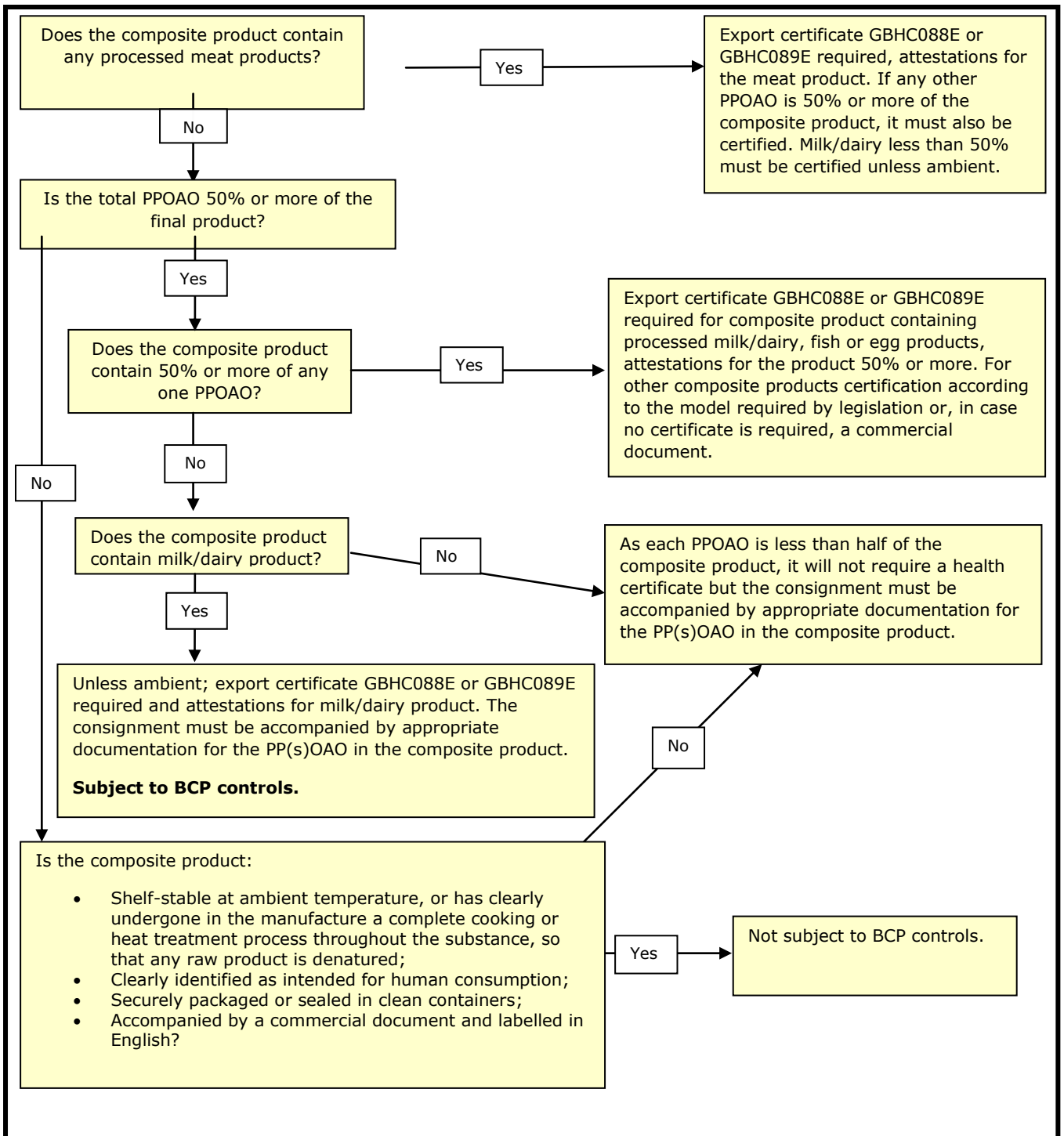
2.5.1 Procedures for applying for export health certification for composite products containing more than one type of PPOAO

For each of the PPOAO contained in the composite product, refer to the guidelines above (2.1 - meat; 2.2- dairy; 2.3 – fishery; 2.4 – eggs). These must be complied with in each case.

If the composite product contains a dairy and/or egg product it must be accompanied by the appropriate export health certificate (EHC) for dairy and/or egg products, unless the composite product is shelf stable and the dairy/egg content is less than half the composite product content (in which case the dairy/egg product does not need to be certified)

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Decision tree to identify Composite Products requiring GB certification from 1st October 2021 and subject to import controls at a Border Control Post (BCP) in GB from 1st January 2022



PPOAO – processed product of animal origin

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3. Composite products that do not require export health certification i.e. Derogated Products

While most composite products do require export health certification (see sections 2.1-2.6), there are some composite products which do not require export health certification.

3.1

Composite products that meet all of the following conditions will not require export health certification for export to or transit through GB.

- A. The product contains no meat or meat products, and;
- B. Less than 50% of the product comes from any one PPOAO (i.e. if there are dairy and/ or egg products contained, each one may not account for more than 49% of the finished composite product, and;
- C. The product fulfils the following conditions/requirements; (either C1 or C2 below)

C1 - For composite products containing milk/dairy products: The milk must be from Ireland, UK, the EU or a third country listed in ANNEX I 'column A' of Regulation (EU) No 605/2010 as amended, and the composite product must meet the requirements of Article 6 of Decision 2007/275/EC. (copy below)

C2 For composite products containing fishery products: Documentation must be available showing whether they were wild origin or aquaculture. For queries relating to catch certification please contact the Sea Fisheries Protection Authority (SFPA) at www.sfpa.ie.

3.2

Composite products that contain both no meat and less than 50% products of animal origin as well as comply with the requirements of Article 6 of Decision 2007/275/EC (see below) will not be subject to official controls at the point of entry At GB or EU. See commercial document template at ANNEX I to assist in fulfilling the requirements of Article 6 of Decision 2007/275/EC.

Article 6 of Decision 2007/275/EC: Derogation for certain composite products and foodstuffs

1. By way of derogation from Article 3, the following composite products or foodstuffs intended for human consumption, not containing any meat products, shall not be subject to veterinary checks:

- (a) composite products containing less than half of their substance of any other processed product provided such products are:
 - (i) shelf-stable at ambient temperature or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance, so that any raw product is denatured.
 - (ii) clearly identified as intended for human consumption
 - (iii) securely packaged or sealed in clean containers

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(iv) accompanied by a commercial document and labelled in English so that that document and labelling together give information on the nature, quantity and number of packages of the composite products, the country of origin, the manufacturer, and the ingredient.

(b) composite products or foodstuffs listed in Annex II [provided later in this table].

2. However, any milk product included in any composite products shall only be derived from, and treated as provided for, countries listed in Annex I to Commission Decision 2004/438/EC (1)

The following products are not subject to official controls in accordance with ANNEX II of Decision 2007/275/EC

CN Codes	Products
1905 10, 1905 20, 1905 31, 1905 32, 1905 40, 1905 40 10, 1905 90 10, 1905 90 20, 1905 90 30, 1905 90 45, 1905 90 55, 1905 90 60, ex 1905 90 90	Bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products; containing less than 20% of processed dairy and egg products and is shelf stable or fully cooked ** 1905 90 covers only dry and brittle products.
1704, 1806 20, 1806 31, 1806 32, 1806 90 11, 1806 90 19, 1806 90 31, 1806 90 39, 1806 90 50	Confectionery (including sweets) and chocolate, containing less than 50% of processed dairy and egg products and is shelf stable or fully cooked **
ex 2106 10, ex 2106 90	Food supplements packaged for the final consumer, containing small amounts (in total less than 20%) of processed animal products (including glucosamine, chondroitin and/or chitosan) other than meat products.
ex 2001 90 65, ex 2005 70 00 ex 1604	Olives stuffed with less than 20% fish Olives stuffed with more than 20% fish
1902 19, 1902 30, 1902 40	Pasta and noodles not mixed or filled with processed meat product; containing less than 50% of processed dairy and egg products and is shelf stable or fully cooked **
ex 2104 10 and ex 2104 20	Soup stocks and flavourings packaged for the final consumer, containing less than 50 % of fish oils, fish powders or fish extracts and is a shelf stable or fully cooked **

** i.e. have undergone a complete cooking or heat treatment process throughout their substance, so that any raw product is denatured see Article 6(1)(a)(i) of Decision 2007/275/EC above.

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4. Guidelines on how to apply for an EHC and complete the documentation

4.1 Notifying DAFM and Irish authorities

The Department of Agriculture, Food and the Marine (DAFM) is the competent authority for the provision of export health certification for composite products.

Food Business Operators (FBOs) who wish to export composite products directly to GB, or to transit through GB using the land-bridge must review the detailed information available on [Gov.ie – Agriculture and Brexit](#). This information will be updated as necessary, and contains important guidance and resources.

FBOs must register in advance with DAFM as an importer and / or exporter. Further detailed information is available on [Gov.ie – Agriculture and Brexit](#).

After registering with DAFM, FBOs must apply in advance for export health certificates through the appropriate system. Further detailed information is available on [Gov.ie – Agriculture and Brexit](#) and is provided as part of the registration process.

4.2 Notifying GB Authorities

From 1st October 2021, the importer/consignee/person responsible for the load of composite products must pre-notify the GB authorities of the consignment being imported/ transiting on the “Import of products, animals, food and feed system” (IPAFFS) and must forward a copy of the EHC.

<https://www.gov.uk/guidance/import-of-products-animals-food-and-feed-system>

It is planned that from 1st January 2022 official controls on composite products will take place at UK Border Control Posts.

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For further information on the resources available visit [Gov.ie – Agriculture and Brexit](#)

ENDS

ANNEX I
LETTERHEAD OF ESTABLISHMENT OF ORIGIN

Commercial document for composite products not subject to veterinary checks in compliance with Article 4 & 6 of Commission Decision 2007/275/EC

1. The name of the composite product: _____
2. The name of the manufacturer: _____
3. Country of origin: Ireland
4. The CN code: _____
5. Ambient/chilled/ frozen¹
Delete as appropriate

6. Ingredients	Processed milk/dairy product²	% of the final product	Country of origin³	Composite product Treatment¹	Establishment approval number⁴
	Other processed product of animal origin⁵				
	Total products of animal origin⁶				
	Product of plant origin				
	Total products of plant origin⁷				

7.	Number of packages	Gross weight	Net weight

8.	Labelling details⁸

¹ Unless ambient a composite product containing any milk/dairy must have been heat treated throughout its substance so that any raw product is denatured and must come from an approved establishment.

² E.g. pasteurised milk, cheese, lactose, casein, whey etc.

³ Country must be Ireland, UK, EU or a third country listed in ANNEX I 'column A' of Regulation (EU) No 605/2010 as amended.

⁴ Establishment approval number of manufacture of the composite product if not ambient.

⁵ All raw materials must be listed whether of animal or plant origin.

⁶ Total of all products of animal origin must less than 50%

⁷ Total of all plant products must be or more than 50%

⁸ The label must contain the product name; manufacturing address; lot number; expiry date & it must be clear that the product is for human consumption.

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I, the undersigned, declare that the product detailed above contains no meat or products containing or derived from meat and all the information in this document is accurate and correct. I further declare that the product fulfils the requirements for composite products not subject to veterinary export health certification in accordance with Commission Decision 2007/275/EC.

Signed: _____ Date: ____/____/20____

PRINT NAME: _____ Title/Status _____
IN CAPITAL LETTERS