

## Department of Agriculture, Food and the Marine

### Trader Notice MH 06/2023

**To: All Food Business Operators at manufacturing, storing, or distributing Composite Products**

### **Subject: Guidance on Composite Products**

#### **Background**

The UK published its draft [Border Target Operating Model](#) (TOM) in early 2023 and this outlines the import certification requirements for products moving from the EU and elsewhere to the GB mainland.

Live animals, products of animal origin and animal by-products have been classified into three categories based on risk as follows:

1. **High risk:** live animals, live aquatic animals, and germinal products (with published exceptions for animals with additional safeguards or assurances or which present a lower risk) and commodities covered under safeguard measures.
2. **Medium risk:** raw, chilled, frozen meat, meat products, dairy, animal by-products for use in animal feed, fishery products and aquatic animals imported as products of animal origin.
3. **Low risk:** processed, shelf-stable products such as composites and certain canned meat products, processed animal by-products and certain fishery products and aquatic animal products from lower risk countries.

The UK government has indicated since that some dairy products<sup>1</sup> and all composite products are classified as low risk which means that no export health certification is required for these products. However, as the TOM is still in draft format, this is the best information available at this time and may be subject to change at some future date.

#### **Scope**

This Trader Notice is intended to assist FBOs in determining if the products of animal origin (POAO) that they produce are Composite Products. It is important to note that there are still some grey areas.

#### **What are Composite Products (CP)?**

The UK government has retained [Commission Decision 2007/275/EC](#) as the basis of their definition of Composite Products which are defined in Article 2(a) 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”.*

It is important to distinguish Composite Products from:

- **Processed products of animal origin (PPOAO) –**
  - Meat products (ham, salami, etc.)

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<sup>1</sup> Raw dairy products and liquid milk for human consumption will require certification

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

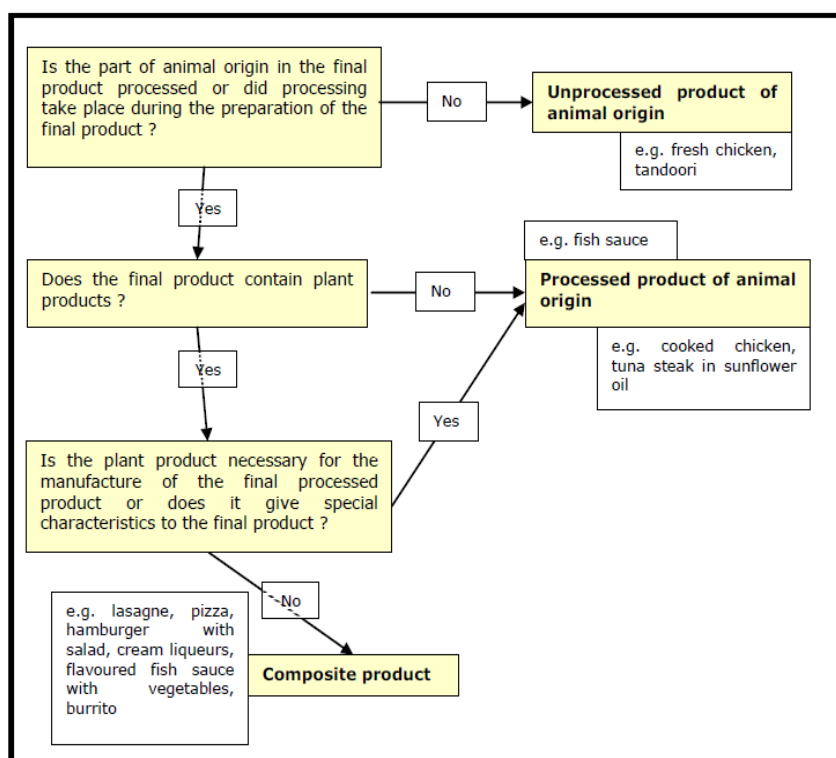
These are manufactured under Regulation 853/2004.

- **Meat Products** – specifically defined as a processed animal product, namely meat that has undergone a process whereby the cut surface no longer has the characteristics of fresh meat. Manufactured under Regulation 853/2004

Composite products combine **plant material** with processed products of animal origin (PPOAO) and may be manufactured in a plant registered only under Regulation 852/2004.

The decision tree below will help to distinguish Composite Products from processed products of animal origin.

**Picture 1: Decision tree to define if a product containing ingredients of animal origin must be considered as a composite product**



### Products which could erroneously be considered as composite products

Processed Products of Animal Origin (PPOAO) containing a product of plant origin are not composite products if:

1. The product of plant origin is used only to add special characteristics (flavour, sweetness, colour, texture) to the PPOA, or,
2. When the product of plant origin is necessary for the manufacture of the PPOAO.

Examples of these products that could be wrongly classified as composite products are:

- Skewers containing fresh meat and vegetables.
- Cheeses to which herbs are added or yogurts to which fruit is added remain dairy products.
- Cooked sausages or puddings to which garlic or soya is added remain meat products.
- Chicken goujons despite being crumbed are meat preparations (raw chicken)
- Canned tuna to which olive oil is added remain fishery products.

#### **Examples of Composite Products** (must have plant material)

Composite products must be intended for human consumption.

Composite products must contain both:

1. Products of animal origin which have been processed, and
2. 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:

- Meat pie (containing cooked meat)
- Chicken en croustade: (cooked chicken that has been wrapped in pastry dough and baked in the oven)
- Canned chilli beef with beans
- Beef burger with cheese tomato and salad
- Chicken curry (pieces of cooked chicken combined with vegetables in a sauce)
- Beef lasagne (cooked minced beef, sauce, and pasta)
- Pot noodle containing meat powder.
- Cooked meat and salad sandwiches/wraps.

Examples of composite products containing dairy products

- Pizza containing pasteurised cheese (+/- meat products)
- Gateau with a layer of pasteurised cream
- Vanilla flavoured ice cream with wafer and hazelnuts
- Cream liqueur

Examples of composite products containing fish:

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

As mentioned previously, there will be grey areas where it is not easy to classify a product as composite, or where a product thought to be a composite product is rejected at the UK border because, in their view, it is not a composite product and needs a health certificate.

If you are having difficulty classifying products even after using the decision tree above, please contact Brexit Call.

Meat Hygiene Division

May 2023