An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine

Department of Agriculture, Food and the Marine

Trader Notice: ABP No. 3/2018

To: **Operators of approved category 3 rendering plants**

Subject: **The export of processed animal protein derived from ruminants, and of processed animal protein derived from both ruminants and non-ruminants**

Note: **Trader Notice ABP No. 2/2016 is withdrawn**

Ruminant Material

Legislative Background – Commission Regulation (EU) 2017/893 amending Annexes I and IV to Regulation (EC) No 999/2001 of the European Parliament and of the Council and Annexes X, XIV and XV to Commission Regulation (EU) No 142/2011 as regards the provisions on processed animal protein

Regulation (EU) 2017/893 ended the ban on the export of processed animal protein (PAP) derived from ruminants from 1 July 2017 subject to the certain conditions that reduce the burden for trade and bring more proportionality compared to the current BSE epidemiological situation. These conditions are aimed at ensuring that the exported products do not contain meat-and-bone meal, the export of which is not authorised by Article 43(3) of Regulation (EC) No 1069/2009.

Conditions

1. The processing plant must be approved for the processing of category 3 material and in accordance with Article 45 of that Regulation, it must be subject to regular official controls, including, where the processing plant is also approved for the processing of category 1 and/or 2 material, as regards the permanent marking of category 1 and 2 material required by that Regulation.

2. The PAP must be transported in sealed containers, directly from the processing plant of production or PAP store to the point of exit from the EU, which must be a border inspection post (BIP), listed in Annex I to Commission Decision 2009/821/EC.

3. Before leaving the EU, the operator responsible for arranging the transport of the PAP must inform the competent authority at the BIP of exit of the arrival of the consignment.

4. The consignment must be accompanied by a commercial document issued from the integrated computerised veterinary system (TRACES) introduced by Commission Decision 2004/292/EC. Refer to point 6 of Chapter III of Annex VIII to Regulation (EU) No. 142/2011 (refer to Appendix 1).

5. The BIP of exit must be indicated on the commercial document.

6. When the consignment arrives at the BIP of exit, the competent authority there must verify the seal of each of the containers.

7. The competent authority at the BIP of exit must inform, via TRACES, the competent authority responsible for the establishment of origin of the arrival of the consignment and, where applicable, of the outcome of the verification of the seal and of any corrective action taken.

8. The competent authority responsible for the establishment of origin must carry out regular official controls and verify that, for each consignment of PAP of ruminant origin intended for export, the confirmation of the control carried out at the BIP of exit was received from the competent authority through TRACES.

DAFM Controls

9. Containers must be sealed at the processing plant by operator under the control of a Department of Agriculture, Food and the Marine (DAFM) official.

10. The DAFM official will carry out risk-based checks to check the integrity of the seal and compare the seal number to that recorded on the commercial document. A record of the seal number and check must be kept for three years.

11. The ruminant PAP must be dispatched directly from the processing plant to either a PAP store under control of the operator and supervised by DAFM, or directly to the Irish port of departure.

12. PAP stores must be under the direct control of DAFM and under the control of the operator.

13. PAP stores must be sealed by a DAFM official using a DAFM seal when not in use.

14. A DAFM official will supervise the loading and unloading of PAP at the store, check the integrity of the seal and verify the number against the commercial document for all incoming and outgoing consignments.

15. Each quarter a DAFM official will take a random sample of PAP from the store and test it for GTH.

16. The responsibility for clearance at the BIP should lie with the person/company in control of the transport and they will advise the Rotterdam BIP at least one day before its arrival by:

    i. Completing the RN1 form (refer to Appendix 2)

    ii. Emailing the completed RN1 form to BIP of exit (currently j.g.vankleef@nvwa.nl at Rotterdam BIP)

    iii. Copying the email to:
        - the DAFM official responsible for the plant
        - DAFM HQ at ABPSAT@agriculture.gov.ie

    iv. Completing a TRACES message under the supervision of DAFM in line with line with the legal requirements below:
        - The consignment must be accompanied by a duly completed commercial document produced according to the model set out in point 6 of Chapter III of Annex VIII to Regulation (EU) No 142/2011 and issued from TRACES.

- On that commercial document, Rotterdam must be indicated as the BIP of exit in box 1.28.

Note: Whether a health certificate is required depends on the requirements of the third country of destination.

Non-ruminant Material

Legislative Background – Commission Regulation (EU) 2017/893
Under Regulation (EU) 2017/893 the export of PAP derived from non-ruminants, or compound feed containing such protein, is subject to the conditions set out below:

17. PAP derived from non-ruminants must be produced in processing plants which fulfil the requirements of point (c) of Section D of Chapter IV of Annex IV to Regulation (EC) No 999/2001.

18. Compound feed containing PAP derived from non-ruminants must be produced in compound feed establishments which:

    i. Produce in accordance with point (c) of Section D of Chapter IV of Annex IV to Regulation (EC) No 999/2001; or

    ii. Source the PAP used in compound feed destined for export in processing plants that comply with point 18 and, either:
        - are dedicated exclusively to the production of compound feed for export from the EU and are authorised for that purpose by the competent authority, or
        - are dedicated exclusively to the production of compound feed for export from the EU and to the production of compound feed for aquaculture animals to be placed on the market in the EU, and authorised for that purpose by the competent authority.

    iii. Compound feed containing PAP derived from non-ruminants must be packaged and labelled in accordance with EU legislation or with the legal requirements of the importing country. Where the compound feed containing PAP derived from non-ruminants is not labelled in accordance with EU legislation, the following words must be indicated on the labelling: 'contains non-ruminant PAP'.

    iv. Bulk PAP derived from non-ruminants and bulk compound feed containing such protein, and intended for export from the EU, must be transported in vehicles and containers and stored in storage facilities which are not used, respectively, for the transport or storage of feed for placing on market and intended for feeding to ruminants or non-ruminant farmed animals other than aquaculture animals. Records detailing the type of products that were transported or stored must be kept available to the competent authority for a period of at least two years.

    By way of derogation, vehicles, containers and storage facilities which have been previously used for the transport or storage of bulk PAP derived from non-ruminants and bulk compound feed containing such protein, and intended for export from the EU, may be subsequently used for the transport or storage of feed for placing on the market and intended for feeding to ruminants or non-ruminant farmed animals other than aquaculture animals, provided that they are cleaned beforehand in order to avoid cross-contamination, in accordance with a documented procedure which has been given prior authorisation by the competent authority. Whenever such a procedure is used, a documented record of

such use must be kept available to the competent authority for a period of at least two years.

Storage plants storing bulk PAP derived from non-ruminants and bulk compound feed containing such protein under the conditions set out in the paragraph above must be authorised by the competent authority based on verification of their compliance with the requirements listed in that paragraph.

19. By way of derogation to the above, the conditions do not apply to:

i. Petfood which contains PAP derived from non-ruminants and which has been processed in petfood establishments approved in accordance with Article 24 of Regulation (EC) No 1069/2009 and which is packaged and labelled in accordance with EU legislation.

ii. Fishmeal, provided that it is produced in accordance with Regulation (EU) 2017/893.

iii. PAP derived from farmed insects, provided that it is produced in accordance with Regulation (EU) 2017/893.

iv. Compound feed containing no other PAP than fishmeal and PAP derived from farmed insects, provided that it is produced in accordance with Regulation (EU) 2017/893.

v. PAP derived from non-ruminants destined for the manufacturing of petfood or of organic fertilisers and soil improvers in the third country of destination, provided that, before export, the exporter ensures that each consignment of PAP is analysed in accordance with the method of analysis set out in point 2.2 of Annex VI to Regulation (EC) No 152/2009 in order to verify the absence of constituents of ruminant origin.

Issued by Milk and Meat Hygiene/ABP/TSE Division
12 December, 2018.

Appendix 1 Commercial Document

Commercial document

For the transport of animal by-products and derived products not intended for human consumption in accordance with Regulation (EC) No 1069/2009 within the European Union

EUROPEAN UNION — **Commercial document**

Part I: Details of dispatched consignment

I.1. Consignor
Name
Address
Postcode

I.2. Document reference No | I.2.a. Local reference No

I.3. Central competent authority

I.4. Local competent authority

I.5. Consignee
Name
Address
Postcode
Tel.

I.6.

I.7.

I.8. Country of origin ISO code | I.9. Region of origin Code

I.10. Country of destination ISO code | I.11. Region of destination Code

I.12. Place of origin
Establishment ☐
Name | Approval number
Address
Postcode

I.13. Place of destiantion
Establishment ☐ Other ☐
Name | Approval number
Address
Postcode

I.14. Place of loading

I.15. Date of departure

I.16. Means of transport
Aeroplane ☐ Ship ☐ Railway wagon ☐
Road vehicle ☐ Other ☐
Identification

I.17. Transporter
Name | Approval number
Address
Postcode | Member State

I.18. Description of commodity

I.19. Commodity code (CN code)

I.20. Quantity

I.21. Temperature of product
Ambient ☐ Chilled ☐ Frozen ☐ Controlled temperature ☐

I.22. Number of packages

I.23. Seal/Container No

I.24. Type of packaging

I.25. Commodities certified for:
Animal feedingstuff ☐ Technical use ☐

I.26.

I.27. Transit through Member States ☐
Member State ISO Code
Member State ISO Code
Member State ISO Code

I.28. Export ☐
Third country ISO Code
Exit point Code

I.29.

I.30.

I.31. Identification of the commodities

Species (scientific name)	Nature of commodity	Category	Treatment type	Approval number of establishments Manufacturing plant	Batch number

▼M3

COUNTRY — **Animal by-products/derived products not intended for human consumption**

II. Health information	II.a. Certificate reference number	II.b.

Part II: Certification

II.1. Declaration by the consignor

I, the undersigned, declare that:

II.1.1. the information in Part I is factually correct;

II.1.2. all precautions have been taken to avoid contamination of the animal by-products or derived products with pathogenic agents and cross-contamination between various categories.

Notes:

Part I:

— Box reference I.9 and I.11: if appropriate.

— Box reference I.12, I.13 and I.17: approval number or registration number. In the case of processed manure indicate in Box I.13 the approval or registration number of plant or holding of destination.

— Box reference I.14: complete if different from 'I.1. Consignor'.

— Box reference I.25: technical use: any use other than for animal consumption.

— Box reference I.31:

Animal species: For Category 3 material and products derived therefrom destined for use as feed material. Select from the following: Aves, Ruminants, Non-Ruminants, *Mammalia, Pesca, Mollusca,* Crustacea, Invertebrates.

Nature of commodity: Enter a commodity chosen from the following list: 'apiculture by-products', 'blood products', 'blood', 'bloodmeal', 'digestion residues', 'digestive tract content', 'dog-chews', 'fishmeal', 'flavouring innards', 'gelatine', 'greaves', 'hides and skins', 'hydrolysed proteins', 'organic fertilisers', 'pet food', 'processed animal protein', 'processed pet food', 'raw pet food', 'rendered fats', 'compost', 'processed manure', 'fish oil', 'milk products', 'centrifuge or separator sludge from milk processing', 'dicalciumphosphate', 'tricalciumphosphate', 'collagen', 'egg products', 'serum of equidae', 'game trophies', 'wool', 'hair', 'pig bristles', 'feathers', 'animal by-products for processing', 'derived products',

Category: Specify Category 1, 2 or 3 materials.

In case of Category 3 material, indicate the point of Article 10 of Regulation (EC) No 1069/2009 that refers to the animal by-product concerned (e.g. Article 10(a), Article 10(b), etc.).

In the case of Category 3 material for use in raw petfood indicate '3a', '3b(i)' or '3b(ii)' depending on whether the animal by-products are referred to in Article 10(a) or in Article 10(b)(i) or (ii) of Regulation (EC) No 1069/2009.

In the case of hides and skins and products derived therefrom, indicate '3b(iii)' or '3(n)' depending on whether the animal by-products or derived products are referred to in Article 10(b)(iii) or in Article 10(n) of Regulation (EC) No 1069/2009.

Where the consignment is made of more than one category, indicate the quantity and if applicable the number of containers per category of materials.

Treatment type: For treated hides and skins indicate the treatment:

'(a)' for dried;

'(b)' for dry-salted or wet-salted for at least 14 days prior to dispatch;

'(c)' for salted for seven days in sea salt with the addition of 2 % sodium carbonate.

For Categories 1 and 2 materials describe the method of processing or transformation. Indicate the relevant processing method (choose a method from 1 to 5 referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011).

For Category 3 materials and derived products from Category 3 material destined for use in feed: if appropriate describe the nature and the methods of the treatment. Indicate the relevant processing method (choose a method from 1 to 7 referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011).

Batch number: Enter batch number or ear tag number, if applicable.

Part II:

— *The signature must be in a different colour to that of the printing.*

Signature

Done at ..... on .....

(place) (date)

.....

(signature of the responsible person/consignor)
(name, in capital letters)

Appendix 2: RN1 Form

Notice of Arrival of Ruminant PAP at Rotterdam BIP

Processing Plant Name	
Processing Plant Address	
Email Address	
Country of Origin	
Date of Departure	
Port of Departure	
Date of Arrival	
Ship	
Pier of Arrival	
Shipping Agent	
Container Numbers	**Seal Numbers**

Notes/Additional Items
