



## Importing Products of Animal Origin (POAO) for Human Consumption from the European Union into Great Britain

**Frequently Asked Questions** 

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### **Products of Animal Origin (POAO)**

#### What is a product of animal origin?

Products of animal origin (POAO) are animal products for human consumption.

This includes (but is not limited to) the following food groups:

- meat, including fresh meat, meat products, minced meat, meat preparations, poultry meat, rabbit farmed game meat and wild game meat
- eggs and egg products
- milk and milk products
- honey, gelatine and gelatine products

#### What changes are coming into force for POAO in January 2022 and July 2022?

From 1 January 2022, the importer in Great Britain (or a representative acting on their behalf) must pre-notify the authorities about <u>imports of ABP</u> using the <u>IPAFFS</u> system.

From 1 July 2022, goods must be accompanied by a certified Export Health Certificate (EHC). Goods must also come in through a point of entry with a <u>Border Control Post</u> (BCP) that is designated to receive those goods.

#### Where will I get an EHC?

<u>Export Health Certificates</u> are issued by the competent authority in the exporting country, based on the requirements outlined in the model health certificates on <u>gov.uk</u>. The EHC is issued to the exporter based in the European Union (EU), who then provides the importer with an electronic copy to upload onto the notification in IPAFFS before the consignment arrives into Great Britain. It is the responsibility of the GB importer (or a representative acting on their behalf) to pre-notify authorities using IPAFFS.

For commodity-specific advice, please refer to the Import Information Notes (INN) on the Animal and Plant Health Agency's (APHA) <u>Vet Gateway</u>.

#### Is there a list of POAO subject to veterinary checks?

Check if the CN code for your product is listed in <u>Regulation 2019/2007</u> to find out if your POAO commodity is subject to official controls at Border Control Posts (BCPs). Note that this list is not exhaustive.

Please refer to the <u>model health certificates</u> or <u>Import Information Notes</u> (IINs) for guidance on whether a POAO commodity is permitted to be exported into GB and what veterinary checks are required. You can also get advice from the competent authority in the EU Member State from which you will be exporting.





### What should I do if an export health certificate is not available for my POAO commodity?

If no export health certificate is available for the commodity, or you cannot meet the conditions of the export health certificate, check if there is a <u>general licence or authorisation</u>. If there is no general licence available, complete the <u>IV58 form</u> and send this to <u>imports@apha.gov.uk</u>

As part of the application, you will need to include the:

- Ingredient list, including percentage breakdown
- Origin of the POAO content and final product
- Flow diagram of the process to develop the final product (including heat treatment/processing applied to POAO)

#### What are the requirements for POAO samples?

Sanitary and Phytosanitary (SPS) import requirements apply to samples.

- If the sample is being taste tested, it is a product of animal origin (POAO) for human consumption.
- If the sample is not being taste tested, it may be an animal by-product (ABP) not for human consumption.

EHCs are issued by the competent authority in the exporting country, based on the requirements outlined in the model health certificates on <u>gov.uk</u>. The EHC is issued to the exporter based in the EU, who then provides the importer with an electronic copy to upload onto the notification in IPAFFS before the consignment arrives into Great Britain. It is the responsibility of the GB importer (or their representative) to pre-notify authorities using IPAFFS.

In some cases, imports of trade samples may be permitted to come in under an authorisation with specific import conditions which limits what can be done with the trade sample, for example; being only taste tested by employees of the import company, of no more than a certain weight and having to be destroyed after the analysis is complete. You will need to contact <u>APHA</u>, who will assess this on a case-by-case basis.

#### What are POAO under safeguard measures?

Import requirements, including EHCs, are already in place for a small number of POAO <u>subject</u> to safeguard measures.

Emergency safeguard action can be taken at very short notice to prohibit or restrict the importation of certain products from certain countries following an outbreak of disease or a public health issue (such as avian or swine flu). Information on the latest updates concerning disease outbreaks which may affect imports into the UK can be found on <u>gov.uk</u>





POAO <u>subject to safeguard measures</u> are already required to be pre-notified in advance of arrival using IPAFFS and all goods must be accompanied by an EHC.

The GB importer will also need to supply the EU exporter/Official Veterinarian (OV) with the unique notification number (UNN) that is produced when the importer notifies APHA.

The exporter must add the UNN to the Export Health Certificate. If the safeguard measure is in place due to a new or emerging disease outbreak, and the commodity code is not available in IPAFFS, there may be <u>other steps traders need to take to pre-notify.</u>

#### What is the UNN?

The IMP number is the UNN generated by IPAFFS. This must be provided to the EU exporter to add onto the EHC if importing POAO under safeguard measures.

#### Is a UNN required for all POAO?

No. A UNN will not be required on the EHC for POAO unless it is subject to additional safeguard measures. The vast majority of POAO does not require a UNN on the EHC.

For POAO under safeguard measures, the GB importer should supply the EU exporter/Official Veterinarian (OV) with the unique notification number (UNN) that is produced when the importer notifies APHA about the import. The exporter must add the UNN to the EHC.

#### How do I know if my product is subject to additional safeguard measures?

Guidance is available on <u>gov.uk</u> outlining the safeguard measures and where they apply. Depending on where you are importing from and what commodities, it is clear whether additional safeguard measures apply.

More information can also be found in the commodity-specific Import Information Notes (INNs).

#### **Export Health Certificates (EHCs)**

#### What is an Export Health Certificate?

An <u>EHC</u> is a document that confirms certain information, health standards and regulations have been met, so live animals and animal products can be imported into Great Britain (GB).

EHCs need to be completed by the exporting country and signed by a certifying officer (usually an official veterinarian) or competent certifier, recognised by the exporting country as having the correct qualifications to certify the product in question.

At present, most POAO does not need an EHC until 1 July 2022.





#### Why do I need an EHC?

An EHC ensures that our high biosecurity and food safety standards are met.

A completed EHC is needed for each consignment of animals or animal products imported to GB. If a GB trader imports a consignment which includes a mix of products, they'll need to make sure the exporter arranges an EHC for each product type.

#### Who is responsible for arranging EHCs?

For products coming in from the EU into Great Britain it is the exporters in EU countries' responsibility to obtain the relevant EHC from the relevant competent authority in the EU Member State.

#### What is a consignment?

Consignment is defined in the Official Controls Regulations (OCR):

(37) 'consignment' means a number of animals or quantity of goods covered by the same official certificate, official attestation or any other document, conveyed by the same means of transport and coming from the same territory or third country, and, except for goods subject to the rules referred to in point (g) of Article 1(2), being of the same type, class or description.

#### Can an EHC cover multiple products?

The facility to group various product lines onto a single EHC is decided by the specific conditions of the relevant EHC. For example, multiple commodity codes can be added to one EHC, as far as the definition of the products falls within the scope of the certificate. This can be found in the guidance notes and only if each meets the same attestations on the certificate.

For example, it may be possible to consolidate a number of batches of product into a single consignment, which a single EHC would cover. This could cover, for example, multiple product lines of the same commodity type (e.g. composite products) from the same supplier.

#### What are the process steps for EHCs?

- The exporter contacts the competent authority to arrange for a certifying officer to be allocated to inspect the goods to be imported to GB.
- The certifying officer(s) reviews consignment and if it meets the conditions, issues the EHC.
- The EU exporter must obtain the EHC from the competent authority and send an electronic copy to the GB importer.
- The importer must upload an electronic copy of the EHC on IPAFFS.
- The original certified EHC must travel with the consignment.





#### How long is an EHC valid for?

There are situations where a shelf stable Product of Animal Origin that has been certified already in the exporting country may be stored in a warehouse for more than 10 days before being exported. Usually, the EHC for these products is still valid and the products can be imported after 10 days without the need for re-certification.

For all other products, including products stored in ambient temperatures, the EHC is usually valid for 10 days. If the products are not shipped within 10 days, the exporter is advised to seek advice from the competent authority that issued the EHC.

#### What Export Health Certificate is required for my commodity?

Export Health Certificates are issued by the relevant Member State in line with the requirements laid out in the <u>model certificates</u>. The EU exporter should contact the competent authority in their country to determine which Export Health Certificate is required for their commodity and what the requirements of exporting these products into Great Britain.

### Is an EHC required for each consignment or would it be possible to have an EHC covering an annual validity period for several consignments?

You must obtain an EHC for each consignment. An EHC can only be used once, for its group of products.

### We import POAO from the EU to be processed in GB, and then export the goods back to the EU. Does the processor have to re-issue a health certificate?

The POAO product would need a new export health certificate for either journey, issued by the competent authority in each exporting country.

#### Will Export Health Certificates require other documentation?

Any official SPS documents that are required to accompany the EHC, such as any additional attestations or lab results, will be specified on the appropriate EHC.

Other documentation may be required depending on the commodity, such as a catch certificate for marine-caught fish, or for customs purposes.

#### Is there guidance on EU-GB import EHCs on gov.uk?

We publish <u>guidance on completing the export health certificate</u> and commodity-specific information is available on <u>APHA's Vet Gateway</u>. However, detailed Notes for Guidance (NFGs) are produced by the exporting country. Please contact the competent authority in the exporting country to find out more.





#### Can I see an example of an Export Health Certificate?

Yes. You can find model Export Health Certificates on <u>gov.uk</u> alongside other related templates and information. Note that these model certificates are for your information only – they are not valid for download and manual completion.

#### Does the Export Health Certificate require the vehicle registration number?

All fields on the EHC must be completed, be accurate at the time it is issued, and all mandatory fields must be completed, including the vehicle registration number.

However, in line with Annexe II of 2019/628 the certifying officer should record the intended means of transport in I.15 based on information provided by the exporter. If the vehicle registration number changes, the person responsible for the load must inform the Border Control Post (BCP) of the new registration number.

#### If the vehicle registration number changes, do I need a need EHC?

No. A new EHC is not required if the vehicle registration number changes if all information on the EHC is correct at the time of issue and the person responsible for the load informs the Border Control Post (BCP) of the new vehicle registration number.

### If the trailer and truck numbers must be on the EHC, suppliers may not have this in advance (until the lorry turns up) – so can this be added manually to the EHC?

The UK has implemented the same system at the EU currently has for imports from third countries, and as part of that system, the certifying officer is required to verify the means of transport and its identity, which in many cases is the vehicle registration and the trailer number.

If the truck that leaves the premises where the goods are certified is not going to be the means of transport into GB, the first vehicle's details will have to be entered on the certificate and then the representative or the haulier moving the goods should inform the BCP in writing that the details have changed for the vehicle. This is one of a limited number of situations in which information may be presented to the BCP that is different to what is on the EHC without the certificate needing to be reissued or replaced.

#### Does the EHC need to be completed in English? Are EHCs available in local languages?

The EHC will need to be completed in English to allow for documentary checks to take place. It is the responsibility of the Competent Authority of the exporting country to organise translations of the EHCs to support the certification process.

#### What happens if the original signed EHC is lost or destroyed in transit?

The original EHC needs to accompany the consignment to the BCP/destination. If the EHC is lost or destroyed in transit, it could result in potential rejection of the consignment.





### What happens if there is a discrepancy with the quantity loaded onto the vehicle?

All the details and relevant information for the consignment will need to be reflected on the EHC. The Certifying Officer (CO) will check the details are correct at the point of certification.

#### Can a certifying officer in an EU Member State exporting country certify EHCs remotely?

Animal and animal product imports to GB must meet all the requirements set out in our model EHCs and it is up to Member States to comply with these requirements. There is no legislative requirement for certification to take place in person, providing the certifying officer is still able to determine the consignment meets GB import requirements.

#### What are documentary, identity and physical checks?

A documentary check is an examination of official certifications, attestations and other commercial documents that are required to accompany a consignment.

An identity check entails the visual inspection of a consignment to verify that its content and labelling corresponds to the information provided in accompanying documentation.

A physical check entails a check on the goods to verify that they are compliant with the sanitary and phytosanitary import requirements for GB. This includes, as appropriate, checks on the consignment's packaging, means of transport and labelling, temperature sampling, laboratory testing or diagnosis as required.

#### Can the EHC be printed and signed by hand?

Export Health Certificates are issued to the exporter by the relevant competent authority in the EU Member State. The certificate will need to be signed by the certifying officer.

### For unaccompanied containers such as trailers, can the original EHC be posted to the port, or do they need to be placed inside the means of transport?

The original EHC should be presented and given to officials at the border control post (BCP) of inspection. It is for the exporter or the logistics handler on their behalf to ensure the documents are available and presented at the BCP to the officials.





#### What checks are carried out on Products of Animal Origin?

From 1 January 2022, the importer is required to pre-notify the POAO consignments via IPAFFS and checks will be conducted remotely.

From 1 July 2022, POAO will also be subject to documentary, identity and physical checks on a risk basis and the consignment must enter via a point of entry with a BCP that is designated to receive those particular goods.

#### **IPAFFS**

#### What is IPAFFS?

<u>IPAFFS</u> is the import of products, animals, food and feed system (IPAFFS) and is the new system used to notify the arrival of imports of live animals, animal products and high-risk food and feed not of animal origin.

It is the responsibility of the GB importer (or a representative acting on their behalf) to register for IPAFFS to pre-notify the relevant authority of the goods' arrival.

#### Can a customs agent submit the IPAFF declaration on the importer's behalf?

Yes. You can employ an agent to act on your behalf to submit notifications on your behalf.

#### What information is needed for IPAFFS?

You will need a Government Gateway account, you need to register for the IPAFFS system, and you'll need various company information. We have <u>a guide and a video</u> showing how to register for IPAFFS and we are running webinars on how to submit a notification – see <u>gov.uk</u> for dates and recordings.

#### Is there a test system on IPAFFS that we can use?

There is a link to a training environment on our <u>microsite</u>. Note that you will need to register for a Government Gateway account to access the training environment.

#### Is there a time limit for uploading the EHC into IPAFFS?

The importer will need to upload the export health certificate to IPAFFS prior to the consignment's arrival in Great Britain, and no later than the required pre-notification time. Note that this will not need to be done until EHCs are required, from 1 July 2022.

#### Is it just the EHC that needs to be uploaded or also accompanying documentation?

You must upload a copy of the EHC, but there are no restrictions against also uploading accompanying documentation.





#### What happens if the IPAFFS administrator leaves the company?

We recommend that more than one person is set as the administrator for the company but if you do find you have no one assigned, please contact the Animal and Plant Health Agency <u>imports@apha.gov.uk</u> to resolve the issue.

#### Will there be a CSV capability for bulk upload in IPAFFS?

Currently, there is no CSV capacity bulk upload for products of animal origin. We are exploring delivering advanced capabilities in the future.

## If material containing POAO is exported from GB to the EU and then returned to the UK in its original state, without reworking or any composite changes do we need to declare it in IPAFFS?

Yes, as essentially it becomes an EU import and to return to GB it will have to be exported from the EU back to GB, with the certification necessary for that type of product.

#### Can you notify more than 24 hours in advance?

Yes. There's no limit on how far in advance you can raise a notification, only a minimum required time.

### If your composite product is exempt, due to containing less than 50%, do you still have to do a pre-notification?

Provided that it meets all the requirements to be exempt from border controls, no, it won't need to be pre-notified, as it won't be subject to any SPS border controls.

#### Do you need to upload the proof of exemption into IPAFFS?

No, you won't need to upload the proof of the exemption in all these situations. You should speak to the relevant Port Health Authority in advance, as they are entitled to ask for more information to confirm that goods are exempt and establishing an early dialogue with them will help you in this process.

#### Will physical checks still occur at PODs or will all physical checks be at border points?

The reference of PODs is more for the imports of plants and other fresh produce.

From 1 January to June 2022, there will be no physical or identity checks for POAO. The importer is required only to submit a pre-notification on IPAFFS.

From 1 July 2022, you will need to bring POAO products in through a point of entry that has an appropriately designated BCP for ID and physical checks to be carried out. All goods must be accompanied by a certified Export Health Certificate.





### Can goods go through any port between 1 January and 1 July, not just those specified for a particular type of product only?

Yes, until 30 June 2021, you can continue to arrive at any point of entry. From 1 July 2022 you must bring those goods in via an established point of entry with an appropriately designated Border Control Post (BCP).

# According to the health certificate for composite products from EU countries, meat must come either from GB, the same country as the country of origin, or a third authorised country. What about meat coming from an EU country (other than the country of origin)?

It will be possible to use a meat component coming from another EU country if that EU country has a similar animal health status to the country of manufacture of the composite product.

The meat product component must come from GB, the same country of origin as the country of manufacture of the composite product, or a third country which has a similar animal health status as the country of manufacture of the composite product.

### Is GB planning to ban imports of POAO from countries where there are animal disease outbreaks?

We've always been able to introduce emergency safeguards on imports of products where there are animal disease outbreaks or other public health concerns and we will retain the power to do so, either to prohibit or restrict the importing of certain products from certain countries.

You can find information on the currently in place safeguard measures on <u>gov.uk</u> and that page will be updated if there are any changes in the future.

### One of our products is a composite product made in the EU, shelf stable (ambient), and contains meat (less than 50%). From 1 July 2022, will it require a health certificate?

Composite products containing processed meat, regardless of the percentage, must be accompanied by an export health certificate from 1 July 2022 and the meat content must come from an approved establishment. If the meat and final composite products are produced in the same establishment, then that establishment will need approval. But if the composite product is manufactured in a separate establishment to that of the meat, the composite does not have to come from an approved establishment. It's important to understand that the meat content must come from an approved establishment.





### If a POAO product contains a meat ingredient and is ambient shelf stable does it require an EHC?

Any product of animal origin, which contains meat or is a meat product, will be subject to SPS controls at the border, so it will require an export health certificate either as fresh meat, a meat preparation, or a composite product containing meat products.

#### Does pet food fall under POAO?

No. Pet food is classed as an animal by-product because it's not intended for human consumption.

#### Are cured meat and cheese classed as a POAO products?

Yes, those are products of animal origin and are subject to import controls.

#### Can meat products manufactured in Poland be declared as EU origin?

Yes, if the raw meat that is being used meets the import requirements for GB. If the product is produced in Poland, then it is of EU origin and will be covered by the EU-GB model export health certificate.

### What do you consider a cured sausage if the process of curing is 12 days? Is it considered cured or still raw?

The definition of a meat product is when the processing of the fresh meat results in the product losing the appearance of fresh meat. Please refer to the IINs for more information.

#### If we import fish oil for animal feed for production animals, does it sit under animal byproducts or POAO?

Fish oil for pet food is an animal by-product.

#### Will we need an export health certificate for importing pesto containing 10% cheese?

The rule for composite products means that if it meets the conditions to be excluded from veterinary checks, then it won't require an Export Health Certificate. If a composite product doesn't meet those conditions, an <u>EHC for composite products</u> will be required.





## Will the UK look for any site registration requirements now for POAO coming from outside of the UK? If so, what will these be? Will they be same as EU or different in terms of facility approval listing?

The UK will take on board all currently approved food producing premises in the EU. At the point of transfer on 1 July 2022, any premises that need to be food approved premises, according to Regulation 853, and which become approved after that date will have to be specifically notified to the UK authorities to be added to the approved list.

It's important to distinguish between approved premises and registered premises – these are not the same thing. Most POAO-producing premises must be approved but there are some composite-producing premises, which only need to be registered.

### Where do we obtain certification for importing honey and do we need to provide it with each import?

Consignments of honey need to be accompanied by a relevant EHC for honey. Each consignment of honey will need to be accompanied by an EHC.

#### We import milk products from the Netherlands but the country of origin is New Zealand. Do we follow the process as if the goods were of EU origin?

The consignment will need to be accompanied by an EHC issued by the Netherlands authorities. In the template for the certificate for dairy products, there is the possibility to indicate the original country of origin.

#### Does tinned fish need a catch certificate? What about smoked fish?

In general, fish requires a catch certificate. There are some exceptions: if the product is less than 20% fish, if it's from aquaculture or freshwater and/or the species is exempt, as listed in the IUU regulation under annex 1. If a product is eligible and is processed or stored in a state other than the flag state of the catching vessel, a processing statement or evidence of storage is also required.





# We bring in shipments (of cheese) which are consolidated from up to 10 producers for export as a single shipment. Can a single EHC to cover the entire shipment rather than having to have a separate EHC for each farm's produce?

Multiple similar products could be certified on the same certificate if they are all subject to the exact same attestations. If you have two products that need the same EHC, but different attestations within that certificate, you need separate certificates for them.

In the case of cheese, if they are all from the same geographical region and health status, and meet the same attestations, they could go as one consignment under one export health certificate.

#### Do these requirements cover Switzerland?

Yes. The model health certificates detail the subjects subject to the transitional phasing arrangements. This includes Switzerland.

### Do medical products (reagents used for testing patient blood at hospitals) which contain small amounts of animal origin ingredients fall under POAO regulations?

If your product has a license under medicine legislation issued by the Medicines and Healthcare products Regulatory Agency (MRHA) or Veterinary Medicines Directorate (VMD), or a CE mark, then the product is exempt from SPS controls. However, if it does not have a license issued by the MHRA or VMD, nor a CE mark, it is subject to the introduction of SPS import controls.