



Composite Products

Importing Animal and Animal Products from the European Union into Great Britain

Version 1.3 – 22.10.21



Composite products

What is a composite product?

Composite products are food for human consumption containing both **processed** products of animal origin and products of plant origin. The products must be a key part of the product (i.e., not there just for flavour) and not contain any raw (unprocessed) animal material.

How can I check whether a food product is a composite?

The composites **product definition** decision tree on our [EU-GB Trader Showcase](#) can help you determine whether your product is classed a composite.

What are the new rules for importing composite products from the EU to GB?

From 1 January 2022, the importer in Great Britain (or a representative acting on their behalf) must pre-notify the authorities about [imports of ABP](#) using the [IPAFFS](#) 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 [Border Control Post](#) (BCP) that is designated to receive those goods.

Are there any exemptions from the above rules?

The product will not require to be pre-notified on IPAFFS or need an EHC if it contains less than 50% processed animal product, contains no meat product and meets all the requirements necessary to be exempt from sanitary and phytosanitary (SPS) controls (as set out in [Article 6](#) and [Annex II of retained EU Decision 2007/275](#)).

However, from 1 July 2022 it will still need to be accompanied by a [commercial document](#) and labelled in English so that the document and the labelling together give information on the nature, quantity and the number of packages of the product, the manufacturer, country of origin and ingredients to prove it qualifies for the exemption.

The composites **exempt or not exempt** decision tree on our [EU-GB Trader Showcase](#) can help you determine whether your product is exempt from SPS controls.

The composites **product import requirements** decision tree on our [EU-GB Trader Showcase](#) takes you through what is needed for different product types.



How far in advance do we pre-notify on IPAFFS and when is the latest we can do this?

Pre-notification time is set in legislation, which requires pre-notification to be made at least 24 hours prior to arrival at the port of entry. However, the legislation allows for a derogation, reducing the notification time to no less than four hours prior to arrival, where logistical constraints prevent earlier pre-notification. This derogation can be applied by the competent authority at the Border Control Post (BCP).

From 1 January 2022 businesses will be able to take advantage of the derogation and notify no less than four hours in advance of arrival at the point of entry, without any need to contact the relevant competent authority.

This is a temporary arrangement. From 1 July 2022, importers will be required to contact the competent authority at the point of entry to determine if, and by what degree, a derogation from 24 hours can be applied.

Anyone taking advantage of the derogation between 1 January and 30 June will need to consider that they may not be able to do so from 1 July 2022.

This applies only to EU to GB imports of POAO, ABP and HRFNAO subject to SPS border controls from 1 January 2022. This temporary derogation does not apply to rest of world goods transiting the EU which are not cleared for circulation on the EU market where the final destination is Great Britain. There is no change to existing controls introduced on 1 January 2021, or to controls in place for third countries not subject to the phased introduction of import controls.

Is there a form for providing information about composite products that don't need SPS checks?

There are no fixed requirements or forms. All documents that provide evidence of the exemption must accompany the consignment and should be easily linked to it. Some Port Health Authorities (PHAs) have their own documentation/forms which can be used. If unsure, contact the appropriate PHA.

To be exempt from SPS controls, should the product(s) conform to all the requirements of Article 6 or just some of them?

The product(s) must comply with all requirements of [Article 6](#) in order to be exempt.

Are there exemptions for products containing small amounts of processed meat?

No. If a composite product contains any amount of meat (regardless of percentage) it will be subject to SPS checks.



For exemptions, what are the approved countries from which dairy products can come? And does this apply only to milk and its derivatives or also egg?

Article 6 provides the derogation for controls and health certifications for products that contain POAO (other than meat) that are less than 50%. However, where products meet the Article 6 requirements the dairy element must still come from an approved country. A list of these countries is in the [Retained EU Regulations 605/2010](#). Eggs within those products do not have to come from an approved country – just physical dairy products.

Will SPS import requirements apply to small trade samples?

SPS import requirements will apply to samples, whether intended for human consumption or not. There are some cases in which the import of some trade samples can be permitted under an authorisation/licence. This authorisation sets conditions which will limit what can be done with the sample, e.g. a product for human consumption being taste tested by employees of the importing company only.

If you wish to import samples, you should contact the [Animal and Plant Health Agency](#) (APHA), who can provide details and clarification on any authorisations or licence you may require. In most cases if a product sample is intended to be used for general human consumption it will need to meet standard SPS requirements in full.

If you obtain an IV58 licence for importing samples, does this mean you do not need an EHC, i.e., do we need both or one and not the other?

It depends on the product. You will have to complete an IV58 application and send it to APHA, who will make an assessment. If accepted, a licence of authorisation will be issued. In some cases, the import conditions on that licence may state you only need, for example, a commercial document. However, in other cases you may need an EHC as well.

Is it correct that composite products do not need to go through specific port of entry from 1 January 2022?

That is correct. Composite products can enter any port of entry until 30 June 2022.

Will border authorities be able to request further information or evidence for the exemption?

If port health authorities are not satisfied, they will be able to request further information from 1 July 2022, when physical and ID checks will be introduced. We would advise you to check in advance with the relevant PHA what additional information they may require.



Will there be charges for goods requiring official controls to enter through BCPs?

There will not be any charges levied by PHAs from 1 January to 30 June 2022. They will be able to levy fees and charges from 1 July 2022 when full controls are introduced. The structure for these fees and charges will be announced in due course.

Please note that for some fish products there will be catch certificate and other IUU regulations requirements and PHAs are required to charge for the checks they carry out on those documents. PHA rates for checking catch certificates and other IUUs are determined by individual local authorities and should be checked with PHAs in advance of arrival.

For some composite products imported into the EU, we have to provide a private attestation (implemented regulation 2020-2235, delegated regulation 2019-625). Will this be required for EU-GB imports?

No. The rules for the export of composite products from GB to EU are different to the rules for export from EU to GB.

What information is needed on an Export Health Certificate?

The requirements differ depending on the product being imported. You can find templates on [gov.uk](https://www.gov.uk) that show what information will be needed.

You can find more information about EHCs on [gov.uk](https://www.gov.uk).

If the goods are non-EU origin but imported into the EU and then imported into the UK, which country will issue the EHC?

If you import a product from outside the EU it is classed as a product of the country of origin. If it is further processed in an EU country, it is the country where the processing took place that will issue the EHC, however, the original country of origin of the product will have to be listed on the EHC.

Which processing sites will need to be listed on the EHC – is it just the final one?

The establishment that must be listed will be the manufacturing plant that made the composite product. Details of approved establishments can be found [online](#). You will then need to refer to part 2 of the EHC for the requirements of the specific components in the product.

If the composite product entering the UK contains meat from the EU, is an EHC required for the meat or just the composite product?

EHCs would not be required for the meat product itself but details of the origins of that meat are required on the EHC.



With reference to the Article 6 condition “clearly identified as intended for human consumption”, what is needed on labelling in order to meet these requirements?

The information on the product must easily identify the goods as for human consumption and leave no room for ambiguity. Note that if a PHA is not satisfied that the labelling meets this requirement, the product could be excluded from exemption.

Is there a checklist of what EU suppliers need in order to raise EHCs?

The process of arranging an EHC will be set by the relevant competent authority in the EU country. Your exporter will need to contact them to obtain guidance. You can find out more about obtaining EHCs on [gov.uk](https://www.gov.uk).