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For feed / and food law enforcement, and port health authorities in England

## POAO from China and interpretation of REUL (Retained EU Law) 2002/994

**Summary:** Further clarification on the interpretation of REUL Decision 2002/994 in respect to Highly Refined Products and collagen.

Dear colleague,

This is further to letter [OVS/2020/06](#), concerning the applicability of [retained Decision 2002/994](#).

We have been made aware of different opinions on whether collagen, products containing collagen or highly refined products (HRPs), can be imported from China.

As background, 'food supplements,' like 'composite products,' covers a very wide selection of goods, without saying anything specific about their ingredients. Decision 2015/1068 amended Decision 2002/994/EC by introducing food supplements to Part I of the Annex, but only where they are highly refined. Such substances would include HRPs, where the processing involved in HRPs breaks everything down to a chemical, but not collagen or other Products of Animal Origin (POAO). As an analogue, HRPs, such as Chondroitin Sulphate, should be considered as not requiring an attestation as per Article 2(2).

In considering import restrictions on collagen, or any other POAO not approved within REUL 2002/994, our advice is that products containing them, i.e., supplements, composites etc., cannot be imported either.

Please contact [imported.food@food.gov.uk](mailto:imported.food@food.gov.uk) if you have any questions.

Yours sincerely,

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