



Animal &
Plant Health
Agency

APHA Briefing Note 02/2021

Guidance updates for certification of ABP and POAO exports to the EU and movement to Northern Ireland.

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Purpose

To provide Official Veterinarians (OVs) with information to be aware of in relation to the certification of Products of Animal Origin (POAO) for export to the EU or movement to Northern Ireland. This Briefing Note is updated as new information becomes available. Yellow highlight indicates content that has been amended in the text from previous versions.

OVs are also asked to note the change in contact arrangements for raising capacity concerns relating to provision of EHC services from April 2021. Please see 'Further Information'.

We have also added a schedule of changes to EHC Online in the "Further Information" section of this note, for information.

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v12.1 Animal Health Regulations

- New EU Animal Health Regulation (AHR) and composite rules now apply. As of 21 April 2021, five new EHCs and one private attestation can be used for exports of specific products of animal origin to the EU. This includes two new composite product EHCs and the private attestation document for products exempt from certification. The EHCs are on [EHC online](#) and the [private attestation on form finder](#).
- If your composite product already requires an EHC, you will be able to carry on using the current EHC until August or choose to use the new documentation. If your product does not currently require an EHC, you must follow the new rules. For live animals, germinal products and other products of animal origin you will be able to continue using existing EHCs until August 2021.
- The remaining new EHCs for live animals, germinal products and products of animal origin will be phased in over the coming months.
- Further guidance can be found in [OV Briefing Note 10/21](#).

v12.2 Heat treatment for shelf-stable composites containing dairy

- The European Commission has confirmed it is amending the AHR to allow businesses to use a private attestation to export shelf-stable composite products containing dairy (but not meat) that has not undergone UHT or sterilisation, so long as the dairy product originates and is processed in a third country listed for the export of dairy to the EU, such as GB. As the legislative amendments are not in place by 21 April 2021, when the new Regulation has entered into force, the Commission has agreed an interim arrangement. There is further information in [the guidance](#).

v12.3 Use of schedules

- Information should only be included in a schedule if it is not possible to fit the information within the space provided into the main body of the certificate.
- The schedule must be clearly legible when printed.
- The information provided in the schedule should clearly reference the section of the certificate that it applies to and must match the information that is required in the certificate. Wherever possible this should be provided in the same format as in the certificate (i.e. a table with the same column headers in the same order).

- Only the information required in the certificate should be included in the schedule (e.g. OV's should not include commercial information such as prices or copies of other supporting documentation such as supporting attestations or laboratory results unless specifically instructed to include these).
- OV's must follow the guidance on [APHA Vet Gateway](#) and in the Notes for Guidance for the relevant certificate when using schedules.

v12.4 Cancel and replace (C&R) export health certificates (EHC)

- We are aware that, instead of applying to APHA for C&R EHCs, some certifying officers are creating new certificate and replacing the new certificate number with the old certificate number. This is not allowed.
- As established by The World Organisation for Animal Health (OIE), replacement certificates can only be issued by the Competent Authority, in this case the Centre for International Trade Carlisle (CITC). C&R EHCs not issued by a Veterinary Competent Authority are not considered legitimate and any consignment they accompany might be refused entry by the destination country.
- A request for a C&R to be issued must be done by submitting a completed application for the issue of a C&R EHC ([ET135](#)) to CITC. C&R EHCs are not issued automatically, and other possible solutions will be explored first. C&R certificates will only be issued where the situation requires (e.g. where there has been an error that has been detected after the consignment has left) and after consultation with an APHA Veterinarian in the CITC.
- Additional guidance for Certifiers can be found on the [Certification Procedures page](#) in the Exports guidance on the APHA Vet Gateway. Guidance for Certifiers registered to use the Export Health Certificates (EHC) Online service can be found on the EHC Online page of the APHA Vet Gateway, which includes a [Certifiers Quick Reference Guide for Cancellation and Replacement of an Export Health Certificate](#).
- Any queries relating to C&R EHCs should be sent to export@apha.gov.uk.

v12.5 Exports of raw milk direct from GB farms to the EU

- If exporting raw milk direct from the farm to the EU (e.g. for further processing), the production holdings only need to be registered, and not approved.
- However, if handling the product prior to dispatch (e.g. in a collection centre), the establishment must be approved and listed. The derogation from approval (in Annex III of Regulation (EC) No 853/2004) refers to primary *production*, rather than primary *products*.

v12.6 Treatments for meat – EHC 8254

- For [certificate 8254](#) (meat products, treated stomachs, bladders and intestines) - Table II.1.1 column (B) requires that the treatment specified in Annex II to decision

2007/777/EC is declared. Annex I, point 2 (a) (ii) of the same Regulation reads that *'the products have undergone at least the specific treatment set out in Annex II'*.

- The Commission has confirmed that the treatment code to be entered in column (B) is the treatment code for each meat constituent of the meat product (e.g. treatment code 'D') as referred to in Annex II to Decision 2007/777/EC. Please note for future reference, Regulation (EU) 2020/2235 provides for a specific certificate for meat products processed in countries authorised for entry into the EU for fresh meat, and therefore authorised to enter meat products not subject to a specific risk mitigating treatment (Chapter 25). There is also another certificate for meat products subject to a specific risk mitigating treatment (Chapter 26). These new EHCs will be available for certification to the EU from 21 August 2021.

v12.7 Country of origin for meat – EHC 8254

- For [certificate 8254](#) (meat products, treated stomachs, bladders and intestines) – Table II.1.1 column (C) asks for the ISO of the country of origin. The Commission has confirmed that you should add the country of origin for *each meat constituent* used to produce the final meat product.

v12.8 Transits of chilled meat preparations – EHC 8256

- For [certificate 8256](#) (meat preparations intended for transit through or storage in the EU/NI), the Commission has confirmed that there is no public health requirement for the products to be frozen for transit and/or storage in the EU territory and that Part II.1 of the certificate can be deleted, where the EU is not the final destination of the meat preparation.

v12.9 Lab Reports – EHC 8299

- We are aware of certain BCPs requesting original copies of laboratory reports issued by APHA to accompany consignments using [EHC 8299](#) (blood products not for human consumption to be used in feed) to be attached to the EHC as a schedule, signed and stamped by the Certifying Officer.
- The Commission has confirmed that it is the responsibility of the consignor to provide the laboratory analysis report. Footnote (7) clarifies that it is the responsibility of the operator responsible for the load to present the analysis report to the BCP. To avoid rejections, OVs should see a copy of the test report before they sign the certificate, but are not required to sign and stamp such report. However, as indicated in footnote 7, exporters must present the test report alongside the EHC at the BCP of entry. existence of this analysis report must be ascertained at the time of issuance of the certificate.

v12.10 Scallops – Sensory examination at BCPs

- We are aware of certain BCPs rejecting consignments on the basis that the scallops can give off an unpleasant odour due to the presence of sand and mud, rather than the quality of the commodity itself.
- The Commission has confirmed that sensory examination of smell, colour, consistency or taste of goods are acceptable forms of physical checks, and that this examination is under the full competence of the official inspectors at BCPs. This might lead, on a case by case basis, to decisions of rejection of the consignment if the conclusions are not satisfactory.
- The Commission has advised that the selection of consignments for physical checks are carried out randomly based on frequencies established in Regulation (EU) 2019/2129. However, even if the consignment is not initially selected, official inspectors may decide on their own to extend official controls to physical checks in the event of suspicion of non-compliance (Art. 65.1 OCR), like a strong odour emanating from the consignment.

Items from previous versions (new content highlighted in yellow)

11.1 Frozen bovine meat – text missing in notes for completion of EHC 8261 (last updated 26/03/2021)

- We have been made aware that the English language version of the notes for completion for [certificate 8261](#) (fresh meat, including frozen minced meat, of domestic bovine animals) is missing a sentence, which requires the certifier to indicate the date of freezing where applicable.
- The Notes for Part I on page 6, Box reference I.28, should read: '*Treatment type*: If appropriate, indicate “deboned”; “bone in”; “matured” and/or “minced”. If frozen, indicate the date (mm/yy) of freezing of the cuts/pieces’.
- This will be corrected on EHC Online. Until then, you should include the date of freezing in box I.28 in the ‘Treatment type’ column.

v10.1 Composites exempt from certification (last updated 18/03/2021)

- We are aware of some BCPs rejecting consignments of composite products classed as cakes, breads and biscuits, exported without an Export Health Certificate, that we understand to be exempt from the need for an EHC, on the basis that these products need to be less than 20% POAO to be exempt from certification
- The Commission has confirmed that composite products are excluded from official controls at BCPs (and therefore do not require an EHC) so long as they meet *at least one* of the following conditions:

- (a) Contains less than 50% of products of animal origin, and comply with the specific requirements laid down in Article 6(1)(a) of Commission Decision 2007/275 (EC);
- (b) Or if they are listed in Annex II to Decision 2007/275

- As such, there is no additional requirement for cakes, breads and biscuits that come under the CN codes listed in Annex II to be less than 20% POAO to benefit from the exemption.
- Please note that, in any case, the processed products of animal origin included in composite products must comply with the rules of Regulation 853/2004 (third country of origin authorised to export the processed product of animal origin included in the composite product, approved processing establishment) and compliance with Decision 2011/163/EU on residues. These import requirements on composite products will change as from 21 April 2021.

v10.2 Movements from ambient storage (last updated 18/03/2021)

- Ambient storage facilities are exempt from requiring approval and therefore do not have to be listed in TRACES. We are aware this has led to some issues for exporters of shelf-stable products from ambient storage facilities into the EU, with some BCPs requesting that Box I.11 needs to be completed with an 'Approval Number' of the establishment of dispatch.
- The Commission have confirmed that in such cases, because an approval number is not required by European Union legislation, the corresponding area can be left empty in the certificate.

v10.3 Products containing multiple, unprocessed POAO elements (last updated 18/03/2021)

- For products containing multiple raw meat and dairy components (e.g. chicken breast with dairy based sauce), the Commission have confirmed that if several products of animal origin are mixed or assembled without technological reasons of processing, the final product must be accompanied by the relevant EHC applicable for each product of animal origin used in the mixed or assembled product.

v10.4 Export of hides for further processing into products for human consumption (last updated 18/03/2021)

- We are aware of certain exporters experiencing problems exporting bovine hides for processing, specifically to produce gelatine for human consumption (using EHC [8278](#)), due to the absence of an option to enter 'human consumption' on the CHED.

- The Commission has confirmed that this issue has been verified on TRACES, and that selecting option “human consumption” in CHEDP with CN code 4101 is now possible.
- The Commission have also clarified that technical problems encountered when issuing a CHED in TRACES cannot justify the detention of consignments at the BCP, provided they are compliant with the import requirements of EU legislation.

v10.5 Qualification and title of certifying officers for fishery products EHC origin codes for shellfish (last updated 18/03/2021)

- We are aware of certain BCPs rejecting consignments of fishery products because of the “qualification and title” of the certifying officer on the EHC. The Commission have confirmed that, in the case of fishery products, there is no specific requirement about the “qualification and title” of certifying officers, provided they are designated and authorised by the competent authorities (i.e., a Food Competent Certifying Officer or suitably qualified Official Veterinarian, as authorised by the Animal and Plant Health Agency).
- BCPs are able to check the validity of an OV or FCCO by sending a copy of the signed EHC to exports@apha.gov.uk.

v10.6 Region of origin codes for shellfish (last updated 28/04/2021)

- For Live bivalve molluscs which do require Part I.8 Region of origin to be completed, the harvesting area code to be entered can be found at: [Live bivalve mollusc production areas \(seabed locations\) in Great Britain and the Crown Dependencies approved for export to the EU](#) under heading “SIN (Scotland)/RMP (England and Wales)/Unique Identifier (Crown Dependencies)”. A GBR prefix is not required.
- We are aware of some BCPs challenging the absence of region of origin codes for live king scallops. The Commission has confirmed that *Pectinidae spp* can be harvested outside classified production areas. In this case, it is not required to enter the region of origin code in the certificate.

v9.1 Either/or statements (last updated 11/03/2021)

- Generally, “either/or” statements must be regarded as exclusive, i.e. that only one option must be retained in the statement.
- However, the Commission have clarified that where a single composite product fulfils multiple either/or statements (e.g. because ingredients are subjected to various treatments), they are not exclusive.

- For example, a single composite product certified using the Composite Product EHC might contain both liquid egg and salted egg yolk meaning that the either/or statements are, in this case, not exclusive.

v9.2 Animal by-products for the production of pet food (last updated 11/03/2021)

- EU Regulations provide an Export Health Certificate for [ABP for the manufacture of pet food](#). Point II.1.7 of Part II of this certificate clearly indicates that it can be used for a number of animal by-products, including aquatic animals (except sea mammals) and certain material originating from animals that did not show signs of disease communicable disease to humans or animals, such as hatchery by-products, eggs and egg by-products and day-old chicks killed for commercial reasons.
- Point II 1.3 of Part II of the certificate, under either of the options presented, requires the certifying officer to attest to the slaughter conditions of the animals that have contributed to the ABP. For the products mentioned above, including hatchery waste, this is not relevant or appropriate. However, section II 1.3 cannot be deleted on its entirety and it does not provide options to delete entries that are not applicable while the appropriate attestations being retained.
- The Commission has confirmed that in this case it is acceptable to certify the 'either' statement presented in the certificate in its entirety on the basis that this provides the relevant assurances [a (i) and b(ie)] from the conditions presented. The entire statement should be retained.

v9.3 Poultry meat from GB-hatched poultry (last updated 11/03/2021)

- We are aware of some BCPs demanding contradictory approaches to the certification of Point II.2.3 in [certificate 8296](#), particularly in the case of exports of poultry meat that comes from poultry that has remained in Great Britain since hatching.
- Point II.2.3 in Part II of the certificate contains two pairs of optional statements. The first pair of statements asks for a 'territory' or 'compartment' to be entered., as per Annexe I of Regulation (EC) 798/2008.
- The second pair of statements, as written, could both apply to meat of poultry that has remained in the territory of origin. The Commission have confirmed, however, that either of the options can be selected in this scenario. BCPs should not demand a specific approach.

v8.1 Cleanliness of containers (last updated 04/03/2021)

- We are aware of a number of consignments being rejected due to poor hygiene standards, including the improper use of packaging for movement of products of animal origin. Certifiers are reminded to be attentive to poor hygiene practice and to

raise concerns with food businesses, referring them to [FSA guidance](#) if necessary. Where packaging is not compliant with hygiene standards, products should not be certified for export.

v8.2 Export of composite products from registered establishments (last updated 18/03/2021)

- We are aware of a number of exporters being challenged on the absence of an approval number in Box I.11 of the Composite Product Export Health Certificate.
- The EU Commission have confirmed that establishments manufacturing composite products do not need to be EU listed and therefore approved. This is the case where the establishment of manufacture is not undertaking any processing itself, and is simply assembling a composite product from pre-processed POAO.
- In this scenario, an approval number does not need to be included in Box I.11 or Box I.28 in Part 1 of the EHC, although you may include the registration number of the establishment of dispatch in I.11 if the BCP requests this. If not required to include an approval or registration number, the Commission has confirmed that the box can be left empty in the certificate. The approval numbers of the establishments that have processed the POAO contributing to the composite product should be included in Part 2 of the EHC.

v8.3 Ice cream – composite/dairy status (last updated 04/03/2021)

- We are aware that some exporters have received conflicting advice over whether ice cream products are classed as dairy or composites for the purposes of EHCs.
- The Commission have confirmed that a product's status depends on its composition. "If made of a mixture of dairy products and products of plant origin, it is a composite product. If the product consists of dairy products, it is a dairy product." This response helpfully clarifies that products sold as ice cream can be classed as either composite products or dairy products however we anticipate that BCPs will continue to class many ice creams as dairy product if the products of plant origin are only added to give special characteristics or flavouring to the dairy ice cream (e.g. sugar or vegetable oil). The commission is intending to update its guidance on composite products in due course so further updates will be communicated once this is available.

v8.4 Germinal product exports – bovine semen (last updated 04/03/2021)

- We are aware that some exporters have faced challenges when exporting bovine semen from storage centres. Specifically, certain BCPs have required that Box I.17 on the [relevant EHC](#) contain the reference number for the individual official document(s) or certificate(s) that accompanied the semen from the collection centre to the storage centre.

- These official documents accompanying the semen from the collection centre to the storage centre officially link both premises and provide the evidence that the supplying collection centre was/is approved in accordance with 88/407/EEC and not a nationally approved collection centre.
- The Commission have confirmed that this box is mandatory, even where the storage centre and collection centre at which the semen was collected are both in Great Britain.
- Exporters should make arrangements to enable this information to be provided. These individual official document(s) or certificate(s) or officially endorsed copies thereof must be attached to the EHC
- Where the semen was collected and dispatched to the storage centre prior to January 1st 2021, the certificates referenced in Box I.17 of the EHC should follow the format outlined in Annexe D1 and D2 of [Council Directive 88/407/EEC](#).

v8.5 Animal by-product EHCs 8311 and 8345 – either/or statements (last updated 04/03/2021)

- [EHC 8311](#) (export of animal by-products or the manufacture of pet food):
 - statement II.1.9 in Part 2 contains conditions which only apply to raw material derived from animals treated with certain prohibited substances. The statement is not marked as deletable, but our notes for guidance advise certifiers to delete it unless Category 1 material that has undergone the specified treatment in a third country, prior to import into GB, is being exported. We are aware that some BCPs are challenging the deletion of this statement, even where it does not apply to the product being exported.
 - The Commission has confirmed that, in line with the notes for guidance, deletion of point II.1.9 of the model certificate is acceptable, except where the material has been treated with substances prohibited by Directive 96/22/EC.
- [EHC 8345](#) (export of rendered animal fats and greaves for human consumption):
 - section II.2 in part II currently contains three paragraphs, all named II.2.1 which are either/or statements. The EHC does not identify these statements as deletable, however we have advised certifiers to delete the statements that are not applicable to the consignment being certified in the Notes for Guidance. We are aware that some BCPs are challenging the deletion of this statement, even where it does not apply to the product being exported.
 - The Commission has confirmed that this approach is correct and the statements that do not apply should be deleted.

v8.6 Poultry meat EHC 8296 – box I.24 (types of packaging) (last updated 04/03/2021)

- We are aware that some BCPs are challenging the non-completion of box I.24 (types of packaging) in Part 1 of EHCs for meat of poultry. The Commission has confirmed that this box is struck-out in the model certificate, and therefore completion of it cannot be required.

v8.7 Transit of mechanically separated poultry meat (last updated 04/03/2021)

- We are aware that certain exporters have questioned certifiers on the use of the EU Export Health Certificate for the transit of mechanically separated meat of poultry available in Commission Implementing Regulation (EC) 798/2008. The Commission have confirmed that, as the transit certificate requires the consignment to comply with the conditions of the import certificate for mechanically separated meat of poultry, and this certificate has not been made available, they do not consider the transit of this product across the EU to be permissible.

v7.1 Temperature and transport conditions (last updated 17/02/2021)

- The Commission has confirmed that it is not permissible to have two batches of product with the same commodity code, one of which is frozen and the other chilled, and which are both listed on the same EHC. This is because only one transport condition can be ticked in box I.18.

v7.2 Transits of fish to 3rd countries via EU territory (last updated 17/02/2021)

- We have confirmed with the Commission that transit EHCs are not required for transits of eviscerated fish (whether wild caught or aquaculture origin) through EU territory to a third country. Animal health requirements do not apply to wild caught fish or to aquaculture fish which are slaughtered and eviscerated before dispatch.
- However, regardless of their specific transit, all consignments of fish in transit through EU territory must follow the transit controls procedures set out in EU regulations, including presentation to the BCP of entry and to the BCP of exit.
- An EHC may still be required for entry into the final country of destination.

v7.3 Certificate number on page 2 of EHCs (last updated 17/02/2021)

- A number of BCPs have challenged the absence of a certificate reference number on page 2 of GB EHCs. This is a result of current certificates aligning exactly to models set out in Commission Regulations. We have agreed with the Commission that these can be amended to ensure each page of the EHC bears the unique code of the certificate.

- Until these amendments are complete, Certifying Officers should add the reference number by hand on page 2 and any additional added schedules, clearly initialling and stamping the amendments in the margins as required.

v.7.4 EHC languages (last updated 28/04/2021)

- The Commission have confirmed that EHCs for export to the EU need to be drawn up in one or more of the languages of the Official languages of the EU, understood by the Certifying Officer and the Border Control Post.
- It is therefore only necessary to provide an EHC in English and the language of the member state of entry into the EU. A certificate for the member state of destination (if different from the member state of entry) is not a requirement and can be discarded. **Changes will be made to EHC Online in due course to remove the third language of the certificate altogether.**

v6.1 Operator responsible for the consignment in the case of non-transiting goods (last updated 11/02/2021)

- EHC Online currently states that box I.6 (Operator responsible for the consignment of goods) should not be completed for imports into the EU and must only be populated for transit movements. Although optional in EU legislation, for imports it may be useful to complete this information. The text on EHC Online is being amended.

v6.2 Region of origin for exports where goods are not from and/or processed in the UK/GB (last updated 11/02/2021)

- Box I.7 of on EHCs for products of animal origin to the EU are pre-populated with the Country of origin name “UNITED KINGDOM” and ISO “GB”. This is accurate where the goods are produced, manufactured and/or packaged in Great Britain. Where this is not correct, this should be struck through and amended with the correct country of origin and ISO code. This amendment should then be stamped and initialled.

v5.1 Consignment weights (last updated 02/02/2021)

- We are aware that certain BCPs have suggested a specific format for the inclusion of gross and net weight in Part 1 of the certificate. The European Commission have confirmed that certificates must follow the requirements outlined in the relevant EU legislation from which they originate. As such, if the model EHC does not specify a format for gross weight and net weight any format that clearly outlines this information should suffice.
- For fishery products, it is recognised that the consignment weight at the point of completing a catch certificate may differ from the weight at the point of signing the

EHC. The European Commission has confirmed that there is no requirement for the two weights to match. However, the weight on the EHC should be comparable to the weight given on any commercial documentation accompanying the load to the BCP. Otherwise, the BCP may wish to trigger investigations, on suspicion that the weight provided on the certificate is incorrect.

v5.2 Consignor versus point of dispatch (last updated 17/02/2021)

- The European Commission has confirmed that the address of the 'Consignor' given in Part 1 of the certificate may be different from the address of the place of dispatch given in the same part of the certificate. The former is a natural or legal person responsible for dispatching the consignment. It is not a requirement that this person/organisation always operate from, or be based at, the premises from which the consignment is dispatched to the EU, though they must be located in the exporting country (i.e. the UK).

v5.3 Means of transport (last updated 18/03/2021)

- We are aware of some BCPs insisting that the road vehicle transporting POAO is listed as the means of transport in Part I of the certificate, where a roll-on-roll-off (RoRo) ferry or train are the means of transport for crossing the border. The European Commission has clarified that, in the case of a ferry, the EHC should specify:
 - The number plate of the road vehicle
 - The identification number of the trailer (if applicable)
 - And the name of the scheduled ferry.
- Conversely a number of exporters have been providing details just of the road vehicle and not of the scheduled ferry and consignments have not been held up at BCPs. If a particular BCP is willing to accept this you may wish to continue with this approach.
- In any scenario, you should only select a single option from the boxes indicating different 'means of transport' in I.15, however. If providing the name of the ferry, this should be the 'vessel' option. If you are not able to provide the name of the ferry, you should select 'road vehicle' or, if the BCP requires ferry details, the name of the line you will use.
- The means of transport selected in I.15 will also affect the place of loading entered into box I.13. If a ferry is indicated as the means of transport, the place of loading should be the point at which the vehicle embarks on to the ferry. If road vehicle is selected, the place of loading will be the point at which the consignment was loaded into the vehicle.

- If the transit details (e.g. scheduled ferry) change after the certificate has been issued, you do not need to request for a replacement EHC. However, the operator responsible for the consignment should advise the competent authority of the Member State of entry. They can do that via an email to the BCP official address, from the person or agent that made the CHED pre-notification declaration.

v5.4 Classified harvesting areas approval numbers for non-filter feeder gastropods (e.g. whelks and winkles) exported on the EHC for live bivalve molluscs fit for human consumption (last updated 02/02/2021)

- We are aware of some BCPs insisting on an approval number being entered into Part I of the EHC for the export of all consignments using the EHC for LBMs fit for human consumption. This is to indicate the harvesting area.
- Certain animals exported using this certificate do not require this information. Specifically, non-filter feeder *Pectinidae*, marine gastropods and *Holothuroideae* are exempt from the need to be harvested from a classified harvesting area. Where these animals have been harvested from unclassified waters, there is no requirement for an approval number to be entered into Part I of the certificate. This has been confirmed by the European Commission.

v5.5 Approval numbers for hides on ice (last updated 17/02/2021)

- We are aware that certain BCPs have required Part I of the EHC for fresh hides exported on ice to include an approval number for a processing plant, where the product originates from a slaughterhouse or from a collection centre listed as a facility for collection of unprocessed Category 3 materials.
- The European Commission have confirmed that when fresh hides and skins come directly from a slaughterhouse, the listing of this establishment as a slaughterhouse approved for human consumption is sufficient. Processed hides and skins must come from an approved, suitably listed, animal-by-products processing plant.

v5.6 Region of origin for exports where GB is regionalised versus not regionalised (last updated 17/02/2021)

- Please check the guidance on completion of Part I and II of the EHC at the bottom of the EHC and in the links provided in the NFG. For completion of box I.8-Region of Origin Code, and relevant statements in Part II of the certificate, if applicable; the territory code should be as listed in the relevant legislation that is provided under the notes at the bottom of the EHC.
- We are aware that a number of Official Vets have questioned whether the inclusion of a region of origin code in Part I and II of the EHC is necessary for commodities

where the EU has not regionalised Great Britain as part of the process of third country listing. For example, ovine or bovine meat.

- Where the relevant EU legislation make a specific region code available, this should be included in the EHC even if a single code applies to the entire of GB. For example, Regulation (EU) 2020/2204 provides listing for GB for the export of certain fresh meat, including ovines and bovines. Column 2 of the relevant table in Part I of Annex II of that regulation specifies a Code of Territory 'GB-0' for all of GB. This code should be included in the region of origin box in Part I of the relevant EHCs.
- The notes for guidance have been updated to reflect this.

v4.1 Supplementary guarantees for in feather wild game exports (last updated 26/01/2021)

- We are aware that certain Official Vets have raised questions regarding the use of the Export Health Certificate for [wild game bird meat](#) to certify in feather game. This certificate contains a statement (II 2.7) that requires the game to be either plucked and eviscerated or, if unplucked and uneviscerated to enter the EU via aeroplane. This statement is only applicable if the third country of origin has been listed with the entry 'VIII' in Column 5 of Part I of Annex I of Regulation (EC) 798/2008.
- The UK has not been listed as requiring this supplementary guarantee, so II 2.7 does not need to be certified and should be struck through. The method of transport for in feather wild game exported to the EU or moved to Northern Ireland from GB is therefore not restricted to aeroplane.

v4.2 Tallow exports (last updated 26/01/2021)

- We are aware of challenges faced by certifiers in completing the Export Health Certificate for [rendered fats not intended for human consumption for certain purposes outside of the feed chain](#) for tallow exports.
- As the vast majority of this trade from Great Britain goes into Rotterdam, we have worked bilaterally with the Dutch authorities to develop specific examples indicating what the authorities at Rotterdam are expecting in terms of certification. These have been made available online by the [Food Chain and Biomass Renewables Association](#).
- The Notes for Guidance will be updated in due course to reflect this additional information where it applicable to all export routes.

v3.1 Colour of stamps and signatures (last updated 21/01/2021)

- We have had feedback that some BCPs have insisted blue ink is required when signing and stamping EHCs. This is incorrect. Defra has received confirmation from the EU Commission that stamps and signatures on the original certificate must be

clearly different from the colour of the printed text in the document, but do not need to be a specific colour.

v3.2 Description of containers (last updated 21/01/2021)

- We are aware some consignments being rejected due to brand names being listed on the EHC in place of descriptions. Do not enter brand names on the description of containers but the physical characteristics of them (e.g. use “plastic pallet boxes” rather than “Dolaf”).

v3.3 Consignee details and place of destination (EHC and CHEDs) (last updated 21/01/2021)

- The EU Commission has confirmed that it is permissible for consignee details (name, address) entered into Part I of the EHC to be different from those of the details of the operator responsible for the consignment. As per Part I of Annex II of 2019/628 the consignee is the natural or legal person for whom the consignment is intended in the Member State of destination whereas the operator responsible for the consignment is the person responsible for the consignment on arrival at the EU BCP.
- The details of the consignee in the certificate may not match the details on the CHED. However, the CHED must state the correct address of the consignee/consignees (if different to that in the certificate) and the place/places of destination. This is for the person responsible for the consignment to ensure it happens rather than the Certifying Officer (CO).
- For products to be placed on the EU market (i.e. those that are not following transit procedures), the EU have confirmed that the address of the consignee entered into the EHC and CHED should be a complete address, located in the EU. This is the case even if the headquarters of the consignee are in the UK or another third country.
- Entering details of the place of destination in part I of the EHC is optional (aside from when products in transit are being stored), however this information is required in the CHED. It is possible for this information to be different to the address of the consignee.
- Where consignments are split at the BCP, the initial CHED must indicate the BCP as place of destination, and the various, real places of destinations must be declared in the subsequent CHEDs. In this case, the place of destination if entered on the EHC can (and would) differ from the real place of destination that must be mentioned in the CHED.

v3.4 Responsible operators and presence at BCP (last updated 21/01/2021)

- We have asked the Commission whether operators responsible for consignments (e.g. import agents) need to be physically present at the BCP. Article 15 of the OCR stipulates that operators “shall assist and cooperate with the staff of the competent authorities in the accomplishment of their tasks”. The Commission has confirmed that it is up to the competent authorities to decide which kind of assistance they need. Where BCPs do not have their own workforce to handle the loads, they may request the operator responsible for the consignment or its representative(s) to be physically present at the BCP. Feedback from the French and, in the case of unaccompanied consignments, Dutch Authorities is that physical presence is required. Exporters should check with the importing BCPs whether what the position is.
- Operators responsible for the consignment must be located in the EU territory. If they cannot be physically present at the BCP, the operator must make arrangements to provide assistance at the BCP. In the case where no one could assist at the BCP, it might happen that the consignment is rejected if this absence prevents the official controls from being properly performed.

v3.5 EHCs for non-EU Countries (excluding Northern Ireland) (last updated 21/01/2021)

- COs are reminded that UK’s Chief Veterinary Officer has written to the UK’s non-EU trading partners outlining that they can expect to receive goods bearing a variety of health /ID (oval marks) e.g. those being used pre-January 1st 2021 and those allowed post 31st December 2020. COs should consider this when certifying EHCs non-EU countries. Full guidance is available at <https://www.food.gov.uk/business-guidance/guidance-on-health-and-identification-marks-that-apply-from-1-january-2021> and <https://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/eu-exit-health-and-identification-marks>

v3.6 Trichinella testing (last updated 28/04/2021)

- Defra applied to the EU Commission for listing of GB as a third country to allow us to certify live pigs or pig meat for export as coming from controlled housing without the need for *Trichinella* testing.
- GB has been granted use of a derogation from testing un-weaned piglets under the age of 5 weeks. EU Member States have also voted in favour of our application regarding the ability to certify other pigs or fresh meat from them as coming from controlled housing without the need for trichinella testing. The relevant EU legislation was published on 25 March 2021 and came into effect on 21 April 2021.
- This means the situation for export for live pigs exported to the EU is:
 - *for slaughter* - can be tested for trichinella at the abattoir of destination in the EU

- *for breeding/production* - can be introduced into EU controlled housing or non-controlled housing holdings if from GB controlled housing.
- The position for Northern Ireland (NI) is unchanged from previous guidance:
 - NI does not need to be listed as a third country for the purposes of exporting to the EU and is identified alongside Member States as a country using controlled housing.
 - Consignments of live pigs and pig meat can therefore be certified as coming from controlled housing for export to all Member States.
 - NI is also able to apply the derogation from testing un-weaned piglets under five weeks old.
- In all cases, we advise that exporters contact the importer before preparing the consignment to confirm that they will accept it.

v. 3.7 Groupage Export Facilitation Scheme (last updated 21/01/2021)

- OVs are reminded that 30 day support attestations issued by a registered vet, Food Competent Certifying Officer, or CSO working for the certifying OV are an acceptable form of evidence for products exported under the Groupage Export Facilitation Scheme (GEFS).
- OVs signing EHCs for GEFS members can place reliance on the 30 day support attestation as a form of evidence for the animal health and traceability information it contains, in relation to the products it covers.
- This has been agreed by the Royal College of Veterinary Surgeons and is detailed in the [Groupage Export Facilitation Scheme guidance](#).

v2.1 Certified Copies of EHCs (last updated 19/01/21)

- A certified copy should only be made for the CO to retain themselves, or
- In the specific case of unattended consignments, by prior agreement with the BCP when the risk of the certificate getting lost is high. In this case the original should be forwarded to the BCP by post or courier and the certified copy accompanies the consignment.
- A certified copy should not be forwarded to the importer for completion of CHED Part 1 or as an electronic copy to the BCP for advance checks as the BCP will expect the EHC that travels with the Consignment is an exact match copy, i.e. not annotated as 'certified copy'. A standard colour or black and white copy of the original EHC is the better format for advancing to the importer and to the BCP for advance checks prior to arrival of the goods with the EHC attached.

v2.2 Composite products (last updated 19/01/21)

- BCPs and BCP officials are under instruction to check products and determine whether products are composite products or not as this has legal context for importation checks and requires specific certification and checks accordingly. In order for BCP officials to make this assessment, they will or may need information on both the ingredients of and the processes that are involved in producing the product. This is usually only the case with new products and when a BCP is familiar with the product and source does not require this on an ongoing basis.

v2.3 Description of Goods Box I.25 (last updated 19/01/21)

- Where you require more than 5 commodities in box I.25, or more information than the any particular box or field of entry allows, the information should be added in a schedule. Please ensure you follow the requirements for adding a schedule as it becomes part of the certificate
- Information on how to create a schedule is available on APHA's Vet Gateway

v2.4 Time of departure (last updated 19/01/21)

- Specific EU BCPs may request that box I.14. includes the time of departure, as well as the date. This is not a requirement for POAO, for which only the date is required. Defra has confirmation on this from the EU commission and expects that BCP officials will be revising their requirements in this regard.

v2.5 Page numbering (last updated 17/02/2021)

- The certificate reference number must be provided on each sheet, the pages must be sequentially numbered to span the languages included and any schedules, and each page must bear the signature and official stamp of the CO, i.e. if four A4 pages are printed back to pack on two sheets of A4 paper, all four pages must be stamped and signed. COs will have to make handwritten corrections to pages numbering as may be required. E.g. 1/4 to 4/4 in the example given above.
- Following dialogue with the Commission, we advise that the original page numbering should be deleted when writing in the full sequential order, with corrections accompanied by the initials and the stamp of the Certifying Officer. These additions must be made so that the certificate remains readable, otherwise it might lead to rejection of the consignment.

v1.1 Cleansing and disinfection of vehicles transporting livestock in relation to animal health attestation for EHCs for meat of porcine, ovine, caprine and bovine origin (last updated 21/01/21)

- The Export Health Certificates (EHCs) for meat of porcine, ovine, caprine and bovine origin relating to cleansing and disinfection of vehicles transporting livestock

contains an animal health attestation which states that “regarding meat obtained from animals which have been transported from their holdings in vehicles, cleansed and disinfected before loading, to an approved slaughterhouse without contact with other animals...”.

- It is a statutory requirement in article 3 part 4 of (The Transport of Animals (Cleansing and Disinfection) (England) (No 3) Order 2003 (as amended) and equivalent legislation in Scotland, Wales and N. Ireland that “No person shall use, or cause or permit the use of, any means of transport to transport any animal to which this regulation applies, unless it has been cleansed and disinfected in accordance with Schedule 2 since it was last used to transport any animal or anything which may give rise to the transmission of a disease affecting animals”. General Licences for movement of livestock (under Disease Control Orders) contain the obligation of compliance with such C&D legal requirements.
- The Notes For Guidance (NFG) for these EHCs will shortly be updated to state that “C&D of means of transport may be certified on the basis of compliance with the legal requirements of The Transport of Animals (Cleansing and Disinfection) (England) (No. 3) Order 2003 (as amended) and equivalent legislation in Scotland, Wales and N. Ireland or additional supporting evidence from farm assurance schemes or declarations on Food Chain Information (e.g. as part of the Food Chain Information provided to the slaughterhouses) from the farms of origin which is then included in the Supporting Health Attestations”

v1.2 Supplementary guarantees on EHCs for meat of bovine, ovine and caprine origin (last updated 14/01/21)

- The EHCs for meat of bovine, ovine and caprine origin contain certain statements relating to residency on a specific holding prior to slaughter and, in the case of bovines TB testing, that are only applicable for countries that are listed with supplementary guarantees in column 5 of Part I of Annex II of Regulation 206/2010. The UK have not been listed as requiring any supplementary guarantees relating to these certificates and therefore these paragraphs can be deleted as explained in the Note for Guidance.
- The UK’s listing as a third country by the EU under 206/2010 was confirmed by Commission Implementing Regulation 2020/2204.
- The Notes for Guidance have been updated to reflect the detail of the UK’s listed status and associated supplementary guarantees.

v1.3 Commodity Codes (last updated 17/02/21)

- The OV should confirm with the exporter that the HS Code used correctly describes the products being consigned. Further information on HS Codes can be found

online at: <https://www.gov.uk/trade-tariff/sections>
<http://madb.europa.eu/madb/euTariffs.htm>

- There is information at the bottom of the majority of EHCs with the example commodity codes of 4 digits. If there is not enough space in Box I.19 to include all the commodity codes, please use a schedule.
- Information on how to create a schedule is available on APHA's Vet Gateway.
- The Commission has confirmed that CN codes (8 digits or more) cannot be required in the official certificate (EHC), as only HS codes (max 6 digits) are required here. In any case, the best accuracy for the classification of the goods is expected in the CHED, not in the certificate.
- Various goods, with various CN codes, can be entered in the same certificate provided that they are all legally covered by the same model and that they all refer to the same information provided by the certificate. However, the various goods must be separated in Box I.25 "Description of goods" with all the specific details for each good.

v1.4 Re-exporting POAO to EU (last updated 21/01/21)

- Most products of animal origin from the EU will not require a Health Certificate to be imported into Great Britain until April 2021. Products of EU origin that are in GB prior to this date and are being re-exported to the EU will need to be certified with an EHC and the CO will require the relevant health and traceability information. Unless exempted from certification, this product will also need certification if moved to Northern Ireland. There are a number of options for obtaining this information.
- Commercial documentation or PVS attestation from the EU Member States can be accepted if the EU supply chain is stable. This stability can be attested to based on a one-off certificate from an EU vet.
- Where supply chains are not stable (one-off or irregular) then OV's may request a higher level of proof rather than just commercial documentation.
- The NFGs contain information regarding evidence needed for EU (and NI) origin product (imported before April 2021) are sufficiently flexible for OV's to accept appropriate documentation.
- COs should bear in mind that, aside from where the exporter is a supermarket supplier moving product to Northern Ireland, regardless of information received/obtained, EU/NI origin fresh meat cannot be certified back/on to EU/NI as meat. More details in the restricted and prohibited goods section on [GOV.UK](https://www.gov.uk).

v1.5 Signing and stamping (last updated 17/02/21)

- When signing a certificate, an official veterinarian or other CO should ensure that the certificate contains no deletions or alterations, other than those which are indicated on the certificate to be permissible and any corrections to permitted entries, subject to such changes being initialled and stamped (in the margin) by the certifying veterinarian. Permissible deletions are normally indicated in the 'Notes' section at the end of the certificate, with the instruction 'Keep as appropriate'.
- Where the certificate contains optional or contextual statements, the statements which are not relevant shall be crossed out, individually initialled and stamped by the CO, or completely removed from the certificate.
- Permitted paragraphs and sections may be crossed out by applying a 'Z' across the section or paragraph rather than crossing out line by line.
- There is no requirement for a date and time to accompany each stamp. The date is only entered at the required entry field in part I of the certificate, and at the end where the Certifying Officer signs, stamps and dates that action.
- We are aware of some BCPs demanding that all handwritten information in Part 1 of the EHC is initialled and stamped, including handwritten scoring out of otherwise blank boxes. There is no legal requirement in EU legislation that all the hand-written information entered in the certificate must be signed and stamped. It is only in the case of correction, in any part of the certificate, or in the case of statements to be crossed out, that the certifier must add signature (or initials) and stamp. This has been confirmed by the European Commission. The Commission noted however, in the case of a hand-written certificate, it is expected that the same one person completes the document. If not, the BCP might suspect that empty boxes were completed by another person after the certificate has been signed by the official certifier. You should consider checking with the specific BCP regarding their preference when it comes to the stamping and initialling of handwritten scoring out of otherwise blank boxes in Part I of the EHC.
- Clarification from the EU Commission means that all pages (as opposed to sheets of paper) are signed and stamped once individually in place of fan stamping and in addition to any permitted alterations. There is no requirement to fan stamp and the Notes for Guidance may be disregarded in this respect and will be updated as soon as possible.
- OVs are reminded to consult the Notes for Guidance prior to the certification of each EHC. NfG will be updated with this new information in due course.

Further Information

OVs should make sure they are familiar with all relevant guidance and other documents relating to EHCs and that they discuss requirements with exporters

in advance. See <http://apha.defra.gov.uk/official-vets/Guidance/exports/ehc-online.htm>.

In previous versions of this briefing note, you were advised to contact CertificationCapacity@apha.gov.uk should you identify significant gaps between demand for certification and your capacity as a provider.

From 31 March 2021 APHA this mailbox will close, as APHA will no longer be offering surge capacity to support certification of EHCs.

However we are still keen to hear if there are wider OV capacity issues developing in the market. If you would like to raise an issue after that date, please contact the export enquiries team:

Email: exports@APHA.gov.uk

Tel: 03000 200 301 (between 08:30 and 17:00, Monday to Friday)

Schedule of EHC Online Changes (last updated 28/04)

In response to feedback, we are introducing a series of improvements to the EHC Online system. Please note, these changes will only be applied to new applications. Work is underway to design and implement further changes, which aim to reduce errors and the time taken to complete export certification. These will be listed below.

April – Animal By-Product Improvements

- The improvements listed below for fish certificates will be implemented to the following Animal By-product (ABP) EHCs in the EHC Online service during the week of 26 April 2021: 8299 to 8312 inclusive, 8314, 8315 and 8317 to 8333 inclusive.
- In addition, the length of the approval number field has been increased to enable the full ABP establishment approval number to be added in field I.11.

April – Urgent fixes to EHC 8296

- [EHC 8296](#) for poultry meat has been amended due to text misalignment in the foreign language version of the EHC. As part of this fix the improvements listed below have been automatically included.

March – Usability fixes for fish certificates:

- The following improvements will initially cover certificates 8249, 8250, 8270 and 8349 for fish. The key improvements are:

- **Page numbering.** Once Certifiers have accessed the EHC via the 'editable' certificate link, they are now able to insert the total number of pages, including any additional schedule pages directly into the EHC. The number entered will replicate on every page of the certificate pack. If Certifiers do not know the total number of pages in the certificate pack, including additional schedule pages, they will have to add the page numbers manually at time of certification.
- **Blank pages.** Blank pages have been removed from the EHCs, removing the need for Certifiers to score through and number these pages manually.
- **Serial numbers.** The font size of the EHC serial number has been increased. The EHC serial number field has also been added to page two of the fish/fishery product EHCs, listed below. This will automatically populate and will not need to be manually inserted by Certifiers.
- **Country of origin.** 'United Kingdom' and 'GB' that was pre-populated into field I.7 has been removed. Applicants will now be asked a question during the application process in the EHC Online service to populate this data entry field. Certifiers will be able to update or amend field I.7 digitally or manually as required.