

APHA Briefing Note 07/23

Certification of 'compound products' to France

Date issued: 22 February 2023

Purpose

To clarify the accepted method of linking all component Export Health Certificates (EHCs) when certifying compound products to France. To clarify the Harmonised System (HS) codes and requirement to enter weight of product.

Background

Some products of animal origin exported to the European Union or moved to Northern Ireland require multiple EHCs for a single product. These are sometimes referred to as 'compound products'. These are different from composite products (composite products are food products for human consumption that contain both processed products of animal origin and products of plant origin). For example, a compound product containing raw fish with a knob of butter, will require a fishery product health certificate and a dairy product health certificate.

Article 89 of Regulation (EU) 2017/625 states that official certificates shall:

- bear a unique code section (a)
- allow the easy verification of the links between the certificate, the issuing authority, and the consignment, lot or individual animal or good covered by the certificate section (f)

Certifying Officers (COs) have requested clarity on the HS codes required to certify compound products and the product weights to enter on EHCs for this type of product. This note clarifies the HS code and product weight to be entered.

The actions below are agreed for the exports of compound products to France. It is likely that other EU Member States will follow a similar approach.

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

Action

When certifying multiple EHCs that relate to a compound product:

- The CO should annotate the top of the first page of each EHC with references to the certificate reference numbers of all the other EHCs that relate to the product (for example, by writing "see also [EHC reference number 1], [EHC reference number 2]" ...etc.). This should be inserted in clearly legible text without obscuring any existing text. If there is insufficient space, include this information in a schedule attached to the certificate. Box I.2 on any page should not have more than one EHC reference number.
- The importer should complete Part I of the Common Health Entry Document (CHED) with reference to all the EHCs that relate to the compound product.
- ➤ The EHCs that relate to the compound product should be combined into a single certificate with each page numbered to indicate that it is a particular page in a finite sequence. This may require manual update of the original page numbering by deleting the original page numbering and inserting new numbers in the full sequential order. Corrections should be accompanied by the initials and the stamp of the CO, and these additions must be made in such a way that the certificate remains readable.
- ➤ COs should insert the **HS code of the compound product** on each EHC rather than the HS codes for each individual product of animal origin. The HS code entered on the EHCs must match those used for customs declarations, and therefore needs to correspond to the HS code of the final product.
- COs should enter the combined **net weight** of the mixed/assembled product in box 1.26 of each relevant EHC.

Further Information

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