Department
for Environment
Food & Rural Affairs

Composite Products Decision Tree

Summary

The decision tree is a quick and easy way for exporters to determine whether their product is classed as a composite product.

Exporters should be aware that the decision tree is not an end to end guide for the entire export process. This is for deciding the use of **EHCs only**. It provides a summary of the health requirements that composite products will need to meet the requirements of the current EU health certificate for direct exports to the EU.

How to use

Start at Number 1. If you want to know what a composite product is, follow the **blue diamond-shaped boxes** and the questions will help you to determine your export. If the flowchart shows that you are exporting a **non-composite product**, follow the relevant GOV.UK Guidance.

If you already know that your export is classed as a composite product, follow the **yellow diamond-shaped boxes** to find out the next health requirements to export.

If you are still unsure as to whether your product qualifies as a composite or not, then contact the relevant BCP of entry to confirm requirements for their product.

Page 3 contains additional information on **[1.7]** plant products and page 4 explains **[10]** and the products not subject to veterinary inspection at a Border Control Post in more depth.

Annex A

- Definition of composite product from EU Regulation (pg 2-3)
- **[2.1]** Link to Annex II Decision 2007/777/EC (link)
- **[3.2] [10.3]** Link to extract of Article 6 of EU Commission decision 2007/275 (link)
- **[5.1]** Link to GOV.UK guidance for information on exporting fish (link)
- Contact details for BCPs in EU in case further clarification is required (link)
- Link to GOV.UK Guidance on exporting composite products (link)
- Link to GOV.UK Guidance on exporting live animals and animal products (link)

Department for Environment Food & Rural Affairs

Decision Tree for Export of Composite Products
Stage 1 – Before Travel

Start

1. Are you exporting a composite product?
- I Don't Know
- Yes

1.1 Are you exporting a foodstuff intended for human consumption?
- No: 1.2 **This is not a composite product.** It may be an animal by product (e.g. dog food).
- Yes

1.3 Are all of the products of animal origin in the product processed?
- No: 1.4 **This is not a composite product.** It is a product of animal origin (POAO) (e.g. fresh chicken, tandoori) or a plant product.
- Yes

1.5 Does the product contain plant products?
- No: 1.6 **This is not a composite product** because it may be a compound product requiring different certificates for different components(e.g. salmon, butter)
- Yes

1.7 Does the plant product do anything other than facilitate processing or add special characteristics?*
- No: 1.8 **This is not a composite product** because:
  - processing of the animal product involves adding plant product (e.g. oil) as part of the processing.
  - it may be a dairy product (cheeses to which herbs are added or yogurts to which fruit is added), or a meat product (sausages to which garlic or soya is added), for example.
- Yes

1.9 **This is a composite product** (e.g. lasagne, pizza, cream liqueurs, chicken burrito).

Link to definition of composites from EU regulations (1). https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32007D0275
Go to page 3

Consult Gov.UK Guidance

If exporters are still unsure, contact the BCP of entry to confirm import requirements for their products

Key:
- I want to know what a composite product is
- I want to know what I need to do to export a composite product

Note: An exporter must follow decision tree from beginning to end to understand full export requirements for their product.

2. Does product contain processed meat product?
- No
- Yes

2.1
- Country of origin of the meat must be the UK, an EU Member State or "treatment A" third country/region as set out in Annex II Decision 2007/777/EC.
- The composite product can be assembled at a registered rather than an approved establishment.
- The country of origin for the meat content must have residue plan for the product concerned.
- **EHC required, the issue of which will be subject to veterinary checks at BCP.**
- Meat product content must have undergone EU heat treatment criteria for country of origin of the meat type concerned.

2.2 Is it bovine, ovine or caprine meat?
- Yes

2.3 Must meet BSE and Specified Risk Material requirements as stipulated in EHC.

3. Does product contain processed milk and / or dairy?
- No
- Yes

3.1 Does product Contain 50% or more than 50% milk and / or dairy?
- No
- Yes

3.2 Does product meet Article 6 of EU Commission decision 2007/275?
- I Don't Know

Link to extract of Article 6 of EU Commission decision 2007/275.

3.3
- Country of origin of the dairy must be the UK, an EU Member State or a 'Column A or Column B' country (as listed in Annex I, Regulation (EU) No 605/2010.
- Dairy / milk component must come from an approved third country and an approved establishment.
- The composite product can be assembled at a registered rather than an approved establishment.
- The country of origin for dairy / milk component must have residue plan for the product concerned.
- **EHC required, the issue of which will be subject to veterinary checks at BCP.**
- Dairy / milk component must have undergone EU heat treatment criteria for country of origin of the dairy / milk component concerned.

3.4
- Dairy / milk component must come from appropriately listed country of origin.
- Country of POAO origin must have residue plan.
- Dairy product content must undergo relevant EU heat treatment criteria for country of origin of the dairy product.
- Commercial document required.

4. Does product contain 50% or more than 50%of fish, egg, and / or other processed POAO?
- No
- Yes

5. Does product contain processed fishery product?
- No
- Yes

5.1
- Must come from appropriately listed country of origin.
- Processed POAO must come from an approved third country and an approved establishment.
- The composite product can be assembled at a registered rather than an approved establishment.
- Country of POAO origin must have residue plan.
- **EHC required, the issue of which will be subject to veterinary checks at BCP.**
- A catch certificate and other IUU supporting documents may be required. Check **gov.uk/Brexit-export-fish** for more information.

6. Does product contain processed egg product?
- No
- Yes

6.1
- Must come from appropriately listed country of origin.
- Processed POAO must come from an approved third country and an approved establishment.
- The composite product can be assembled at a registered rather than an approved establishment.
- Country of POAO origin must have residue plan.
- **EHC required, the issue of which will be subject to veterinary checks at BCP.**
- Specific requirements in EHC apply (e.g. regarding Avian Influenza and Newcastle Disease).

7. Does product contain more than 50% of other processed POAO (e.g. honey, gelatine or snails)?
- No
- Yes

7.1
- Must come from appropriately listed country of origin.
- **EHC or multiple EHCs required, the issue of which will be subject to veterinary checks at BCP.**
- Honey must come from country with residue plan.

8. Does product contain less than 50% of other processed POAO (e.g. honey, gelatine or snails)?
- No
- Yes

8.1
- Must come from appropriately listed country of origin.
- **EHC or multiple EHCs required, the issue of which will be subject to veterinary checks at BCP.**
- Honey must come from country with residue plan.
- -If a composite product requires a composite certificate and less than half of its content is honey, gelatine or snails, it may not need an additional health certificate for the honey, gelatine or snail component

9. Does product contain meat or processed milk and / or dairy?
- No
- Yes

10. Does product meet Article 6 of EU Commission decision 2007/275?
- I Don't Know

Link to extract of Article 6 of EU Commission decision 2007/275 (2).

10.1
- Must be veterinary checked on entry to EU
- An EHC is not required
- Commercial document required

10.2 This product is not subject to veterinary checks at a BIP / BCP and does not require an EHC.

Go to next stage – UK Border

Note: *If unsure, check page 3

Department for Environment Food & Rural Affairs

Decision Tree for Export of Composite Products
Stage 1 – Before Travel

1.7
Is
plant product
needed for processing
or give special
characteristics?

I Don't Know

The addition of a product of plant origin during the processing of an animal product (e.g. to add special characteristics or when a product of plant origin is necessary for the manufacture of the product of animal origin) does not automatically mean that the resulting food falls within the meaning of a composite product.

For example:

- Cheeses to which herbs are added or yogurts to which fruit is added remain dairy products.
- Sausages to which garlic or soya is added remain meat products.
- Dairy ice cream, which is processed involving a heat treatment and to which fruits or other plant ingredients are added, remains a dairy product.Certain dairy ice creams may be classed as composite products depending upon their ingredients and the processing. If an ice cream is a dairy product, adding a plant product for flavouring does not make it a composite. The Decision Tree reflects the published guidance from the EU. Exporters should consult with their OV and the BCP of entry if they remain unsure whether their product is considered a composite or will need to travel using a different EHC.

If the processing of the animal product involves adding plant product (e.g. oil) as part of the processing or if the plant product is only added to give extra flavour or other "special characteristics" (e.g. herbs and spices added to a processed sausage) then these products do not automatically become composite products and would remain dairy products or meat products, etc.

Department for Environment Food & Rural Affairs

Decision Tree for Export of Composite Products
Stage 1 – Before Travel

10. Does product meet Article 6 of EU Commission decision 2007/275?

I Don't Know

EU requirements 2007/275 include a list of products not subject to veterinary inspection at a Border Control Post.

These products are:

- Less than 50% of any processed product of animal origin; and
- **shelf-stable at ambient temperature** or cooked / have clearly undergone in their manufacture a complete cooking or heating process throughout their substance, so that any raw product is denatured.
- labelled **for human consumption**; and
- **securely packaged or sealed in clean containers**; and
- accompanied by **a commercial document** and labelled in an official EU language, to give information on the nature, quantity and number of packages of the composite products, the country of origin, the manufacturer, and the ingredient.

Or is one of the composite products or foodstuffs listed below:

CN Codes	Explanations
1704, 1806 20, 1806 31, 1806 32, 1806 90 11, 1806 90 19, 1806 90 31, 1806 90 39, 1806 90 50	Confectionery (including sweets) and chocolate, containing less than 50 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision.
1902 19, 1902 30, 1902 40	Pasta and noodles not mixed or filled with processed meat product; containing less than 50 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision.
1905 10, 1905 20, 1905 31, 1905 32, 1905 40, 1905 40 10, 1905 90 10, 1905 90 20, 1905 90 30, 1905 90 45, 1905 90 55, 1905 90 60, ex 1905 90 90;	Bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products; containing less than 20 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision. 1905 90 covers only dry and brittle products.
ex 2001 90 65, ex 2005 70 00 ex 1604	Olives stuffed with less than 20 % fish Olives stuffed with more than 20 % fish
ex 2104 10 and ex 2104 20	Soup stocks and flavourings packaged for the final consumer, containing less than 50 % of fish oils, fish powders or fish extracts and treated as provided for in Article 6(1)(a) of this Decision.
ex 2106 10, ex 2106 90	Food supplements packaged for the final consumer, containing small amounts (in total less than 20 %) of processed animal products (including glucosamine, chondroitin and/or chitosan) other than meat products.

Then the product meets the Article 6 requirements and is not subjected to a veterinary check however, any **milk product** included in any composite products **shall only be derived from, and treated as provided for, countries listed in Annex I** to Commission Regulation (EU) No 605/2010 (or updates to it).