Composite Products Decision Tree

March 2021
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 exporter process.

This decision tree explains the EU’s process for identifying what certificate a product needs from the 21 April 2021.

The EU’s legislation provides for a phased approach.

- if you export a composite product that currently requires an EHC you will be able to keep using the current EHC until August 2021, or use the new documentation
- if your product does not currently require an EHC, but under the new rules will need one, you will need to use the new composite EHC from 21 April 2021
- composite products that are currently exempt from certification, but under the new rules will need a private attestation, will need to use this document from 21 April 2021

For additional information please read this explanation of the Transitional Arrangements from the EU. You may also like to view the EU’s decision tree and Q&A here.

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, please 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 product or not then please contact the relevant BCP of entry to confirm requirements for the product.

Page 4 contains additional information on the composite products exempt from checks at a BCP.
Decision Tree for Export of Composite Products to EU post 21st April

Stage 1 – Before Travel

1. Are you exporting a composite product?

   Yes
   - 1.1 Are you exporting a foodstuff intended for human consumption?
     - 1.2 This is not a composite product. It may be an animal by product (e.g. dog food).
     - 1.4 This is not a composite product. It may be a plant product.
     - 1.6 This is not a composite product. It may be a product of animal origin (e.g. fresh chicken).

   No
   - 1.3 Does the product contain products of animal origin (POAO)?
     - 1.5 Does all the POAO components processed?
       - 1.7 Does the product contain plant products?
         - Yes
           - 1.9 Does the plant product do anything other than facilitate processing or add special characteristics to the processed POAO?
             - Yes
               - 1.11 This is a composite product (e.g. lasagne, pizza, cream liqueurs, chicken bumbus).
             - No
               - 1.10 This is not a composite product because:
                 - The plant products are only added to facilitate processing of the animal product (e.g. oil added to canned fish), or
                 - To add special characteristics to the animal product (e.g. cheese with added herbs remains a dairy product, cooked sausages with spices remain meat products).
               - 1.10 This is not a composite product.
             - No
               - 1.11 This is a composite product (e.g. lasagne, pizza, cream liqueurs, chicken bumbus).

   No
   - 1.10 This is not a composite product because:
     - The plant products are only added to facilitate processing of the animal product (e.g. oil added to canned fish), or
     - To add special characteristics to the animal product (e.g. cheese with added herbs remains a dairy product, cooked sausages with spices remain meat products).

2. Does product contain processed meat?

   Yes
   - 2.1 Any CP containing meat product is subject to BCP checks and requires an EHC, regardless if it is shelf stable or not.
   - 3.1 Private attestation required and the consignment must be accompanied by a declaration of the exporter of the composite products attesting that the dairy and egg component have undergone at least the heat treatment provided for in point (a) to Article 163 of Delegated Regulation (EU) 2020/692.
   - Check Page 2 for full list of exemptions and requirements.

   No
   - 2.2 Is the product shelf stable?
     - Yes
       - 4.1 Is the product shelf stable?
         - Yes
           - 4.2 If product is not shelf stable and contains processed POAO, then it must be subject to BCP checks on entry to EU and accompanied by an EHC.
         - No
           - 4.3 Subject to BCP checks on entry into EU and requires a private attestation. Exporter declaration required to confirm heat treatment of dairy and/or egg products provided for in point (a) to Article 163 in EU Reg 2020/692.
     - No
       - 3.2 Product will need an EHC for the individual product, e.g. honey, gelatine, collagen or snails. It would not require a composite product EHC.

3. Does product meet requirements that make it exempt from BCP checks?

   Yes
   - 4.1 Is the product shelf stable?
     - Yes
       - 5.1 Product will require an EHC.
     - No
       - 5.2 Product will need a private attestation.

   No
   - 4.2 If product is not shelf stable and contains processed POAO, then it must be subject to BCP checks on entry to EU and accompanied by an EHC.

4. Does product contain processed dairy, egg or fish?

   Yes
   - 5.1 Product will require an EHC.
   - 5.2 Product will need a private attestation.

   No
   - 6.1 Is the product shelf stable?
     - Yes
       - 6.2 Product will need a private attestation.
     - No
       - 7.1 Does the product contain processed meat?
         - Yes
           - 7.2 Product will require an EHC.
         - No
           - 7.3 Is the product shelf stable and contains dairy/egg/fish?
             - Yes
               - 7.4 If shelf stable, private attestation required.
             - No
               - 7.5 If not shelf stable, EHC required.

   No
   - 6.2 Product will need a private attestation.

5. Does product contain only of honey, gelatine, collagen or snails?

   Yes
   - 5.1 Product will require an EHC.
   - 5.2 Product will need a private attestation.

   No
   - 7.1 Does the product contain processed meat?
     - Yes
       - 7.2 Product will require an EHC.
     - No
       - 7.3 Is the product shelf stable and contains dairy/egg/fish?
         - Yes
           - 7.4 If shelf stable, private attestation required.
         - No
           - 7.5 If not shelf stable, EHC required.
Composite Products Subject to Risk-based Border or Destination Checks and Require a Private Attestation

The final shelf-stable composite products not containing processed meat and listed below (includes bread, pasta, olives, sweets) are exempt from BCP checks, provided such products meet all of the following requirements:

- composite products that contain dairy products that have been treated with one of the two treatments referred to in column B of Annex XXVII to Commission Delegated Regulation (EU) 2020/692
- composite products that contain egg products that have been treated with one of the treatments referred to in Annex XXVIII to Commission Delegated Regulation (EU) 2020/692
- they are identified/labelled as intended for human consumption and
- they are securely packaged or sealed.

If the consignment is not subject to BCP checks then the attestation is only needed at the point the consignment is placed on the market.

<table>
<thead>
<tr>
<th>CN codes</th>
<th>Explanations</th>
</tr>
</thead>
<tbody>
<tr>
<td>ex 1704, ex 1806 20, ex 1806 31 00, ex 1806 32, ex 1806 90 11, ex 1806 90 19, ex 1806 90 31, ex 1806 90 39, ex 1806 90 50</td>
<td>Confectionery (including sweets), chocolate and other food preparations containing cocoa that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 1902 19, ex 1902 30, ex 1902 40</td>
<td>Pasta, noodles and couscous that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 1905 10, ex 1905 20, ex 1905 31, ex 1905 32, ex 1905 40, ex 1905 90</td>
<td>Bread, cakes, biscuits, waffles and wafers, risks, toasted bread and similar toasted products that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 2001 90 65, ex 2005 70 00, ex 1604</td>
<td>Olives stuffed with fish that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 2101</td>
<td>Coffee, coffee substitutes, tea or maté extracts,</td>
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<tr>
<td>ex 2104</td>
<td>essences and concentrates and preparations with a basis of these products or with a basis of coffee, tea or maté that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 2106</td>
<td>Soup stocks and flavourings packaged for the final consumer that meet the requirements of Article 3(1)</td>
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<tr>
<td>ex 2208 70</td>
<td>Liqueurs and cordials that meet the requirements of Article 3(1)</td>
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