



## Notice to Importers 2940 issued on 31 December 2020 by Import Controls policy and licencing team, Department for International Trade.

### CERTIFICATES OF FREE SALE (CFS) FOR EXPORTERS

#### This notice explains the process for applying for a Certificate of Free Sale

1. Certificates of Free Sale (CFS) are part of the product registration process that is required before you can place goods on the market in many countries. A CFS confirms to a country that the goods listed on the CFS schedule meet UK product safety legislation requirements to be sold in the UK. For instance, in relation to goods that come into contact with humans or animals, a CFS indicates that such goods are safe to be sold because they are already sold on the UK market which has high product safety standards. A CFS avoids having your product range retested for product safety in every export market.
2. A number of Departments and Agencies issue CFS for different products:
  - The Health and Safety Executive (HSE) can issue CFS for products falling to the Control of Pesticide Regulations (COPR) & Biocidal Products Regulations (BPR) – although there are some circumstances where DIT may issue a CFS for products containing biocides if HSE are unable to). There are different types of documents which HSE can issue, including “export only” statements which will contain information that has not been verified by HSE. Certificates for Plant Protection products (sometimes referred to as agricultural pesticide products) can be obtained from the HSE York office ([PARM@hse.gov.uk](mailto:PARM@hse.gov.uk)). If you require further information please send an e-mail to the following e-mail addresses: [pa.copr@hse.gov.uk](mailto:pa.copr@hse.gov.uk) - for COPR products/actives; [pa.biocides@hse.gov.uk](mailto:pa.biocides@hse.gov.uk) – for BPR products/actives. <http://www.hse.gov.uk/biocides/certificates-of-freesale.htm>
  - Defra issue CFS for products ingested by humans or animals e.g. food and drink, animal feed: [trader@rpa.gov.uk](mailto:trader@rpa.gov.uk).
  - Medicines and Healthcare products Regulatory Agency (MHRA) issue CFS for medical devices. To apply the manufacturer, legal manufacturer, or authorised representative must be based in the UK and the medical devices you’re exporting must be CE marked to show compliance with the Medical Device Regulations (although there are circumstances where DIT may issue a CFS for a medical product if it does not fall within the legal definition of a medical device): <https://www.gov.uk/guidance/export-medical-devices-special-rules>. Contact the MHRA if you need help at: [device.cfs@mhra.gov.uk](mailto:device.cfs@mhra.gov.uk).
3. DIT’s Import Licensing Branch (ILB) is responsible for the issue of CFS for all other products coming into contact with humans or animals. These cover a range of product safety legislation. CFS are applied for at [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk) and issued digitally. The exporter prints the document for use overseas.

#### Applying for a DIT CFS

4. Open an account at [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk). From your account, make an exporter access request. Once approved you will be able to request CFS. An agent can do this for you but you must open an account first so the agent can be linked to your account. Your agent must also open an account and request to act as your agent. Advice on how to fill in the application form can be found on the registration page at [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk).

### **Printing a hard copy of the CFS**

5. The certificate is issued on [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk) and once issued you can access it via the responses link within the case. Please ensure that you validate the digital signature on the certificate, it will show a green tick once validated, before printing the certificate on plain white paper. Please see this Notice's annex for guides on validating the digital signature. There is also a supplementary validating guide on the log on screen of [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk).

### **FCDO Legalisation Service**

6. Many overseas countries require confirmation that the CFS we issue has been issued by a Government Department. This is done by the FCDO Legalisation Service. Information on this service can be found at <https://www.gov.uk/get-document-legalised>. Please note that the FCDO legalisation team require that the certificate is first notarised before being sent to them for legalisation.
7. All previous EU product safety legislation has been introduced into UK law as retained EU law under the EU (Withdrawal) Act 2018 and any necessary fixes made via a statutory instrument under the Act. CFS now only refer to UK product safety legislation if you are based in GB while Northern Ireland traders will list UK and/or EU legislation as a result of the impact of the Northern Ireland Protocol. They will also only refer to goods sold on the UK market. We can no longer issue CFS for companies based outside the UK. CFS applications can only be submitted if you are based in the UK. CFS are not time limited. A letter explaining to overseas product safety authorities that the UK has left the EU but retains all EU product safety legislation in UK law will be issued with each application. Please email [enquiries.ilb@trade.gov.uk](mailto:enquiries.ilb@trade.gov.uk) if you are having issues with CFS acceptance overseas.

*This document is for information purposes only and has no force in law. Please note that where legal advice is required, importers should make their own arrangements.*

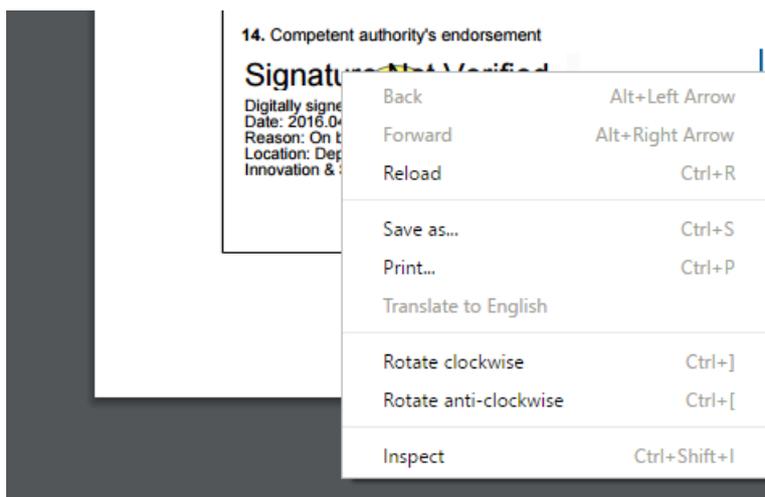
## Annex

Please use these guides in conjunction with the 'how to validate a digital signature' guide that can be found on the log on screen of [www.ilb.trade.gov.uk](http://www.ilb.trade.gov.uk).

### a) Validating on Windows devices

We have tested validating signatures from our side using the latest version of Adobe Reader, following the instructions on the 'How to validate a digital signature', the signature validates without any problems.

Please make sure the document is not opening in an Adobe Browser plugin (which is the default option in most cases, e.g. see the screenshot below).



This is what the options will look like if you are in the Adobe Browser plugin, as you can see the normal options are not present. Instead you only have print/rotate/save as etc.

The issued certificate should have a 'valid' green tick on it. If you see a yellow question mark this means that your computer does not recognise our validation programme (and doesn't let you see the green tick). As long as you are using adobe8 or higher and **opening the document within Adobe Reader rather than the browser**, the instructions below usually resolve the problem.

- Right-Click on the question mark
- At next screen click either "validate signature" or "show signature properties" (both take you to the same screen)
- At next screen click "Show signers certificate"
- At next screen click "Trust"
- At next screen click "add to trusted certificates".
- Click OK as many times as necessary until you are back to the certificates which should now show a green tick.

You should only need to do this once on each laptop/pc that you use to receive and view the ILB electronic documents.

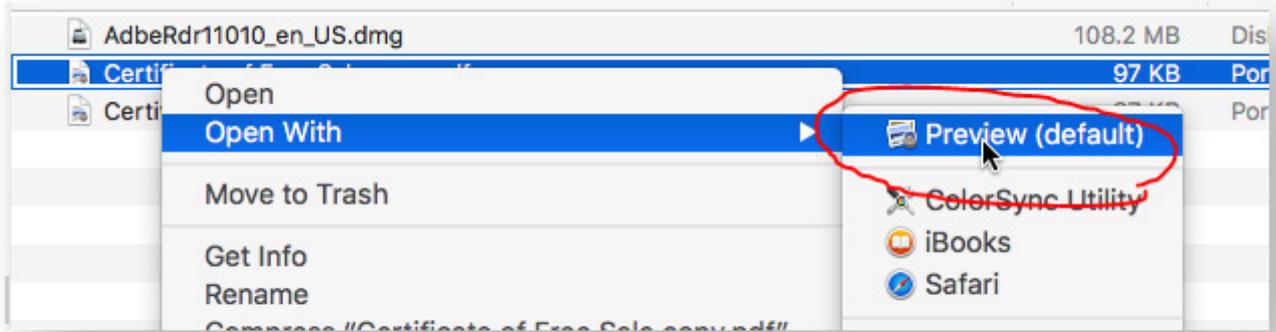
**If this hasn't resolved your issue the chances are that you are opening in a browser plugin. You will need to save the PDF to your computer and open the file in Adobe Reader.**

### b) Validating Digital Signatures (MAC OS)

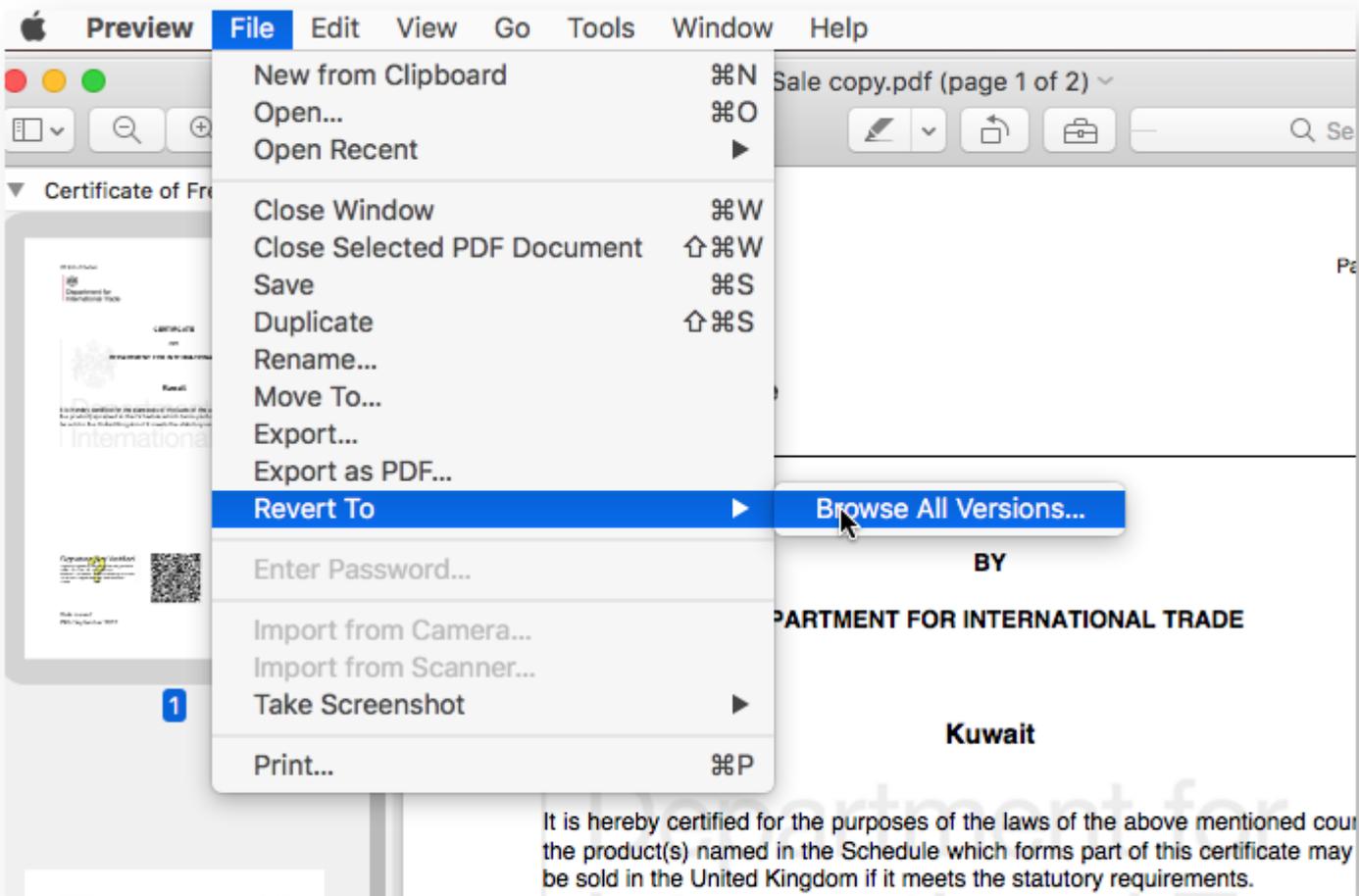
There is a known problem with the preview app and digital signatures on a MAC. If you have viewed the PDF with Preview prior to opening it in Adobe Reader you won't be able to validate the signature.

There are a few options for resolution.

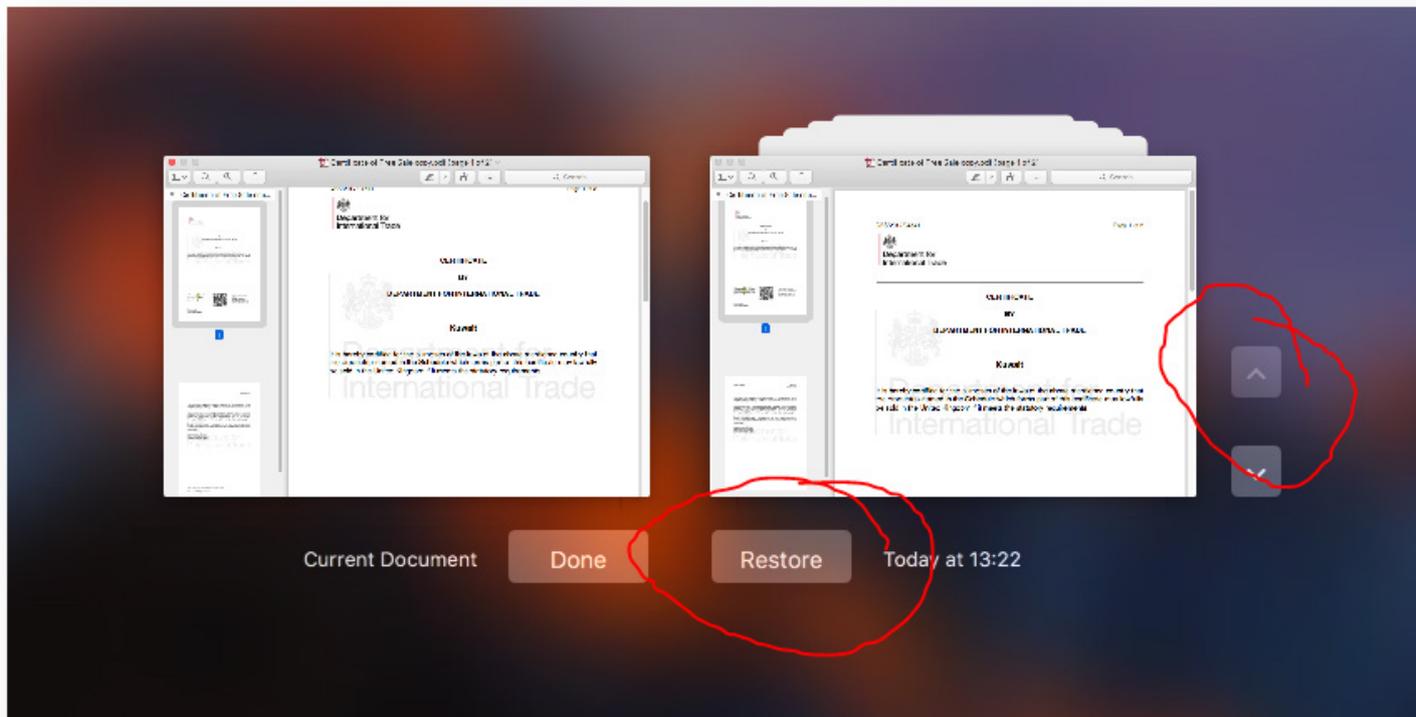
- 1) Download the PDF again, making sure that if it does get opened in Preview you quit out of it without clicking on any element in the PDF at all - this is what causes Preview to break the signature. Then open the file in Adobe Reader and the instructions in [Validate Digital Signatures](#) should work.
- 2) If that doesn't work you can try getting Preview to undo any changes it's made. Force Preview to open the PDF by right clicking and going open with preview



Within Preview, go File, Revert To, Browse All Versions



In the version selector click the up arrow to get to the earliest revision of the file - this should be a version identical to the one downloaded. Then click Restore.



Quit Preview and open the PDF with Adobe. The normal validation instructions should then work.

3) Alternatively use a windows PC. There's no equivalent default preview application in Windows that does anything like what MacOS Preview does.

They might like to consider the following guide <http://osxdaily.com/2012/08/22/turn-off-auto-save-os-x/> to disable auto-save in MacOS.