VETERINARY CERTIFICATE FOR THE EXPORT OF FINISHED FOOD PRODUCTS CONTAINING MATERIAL OF ANIMAL ORIGIN TO THE RUSSIAN FEDERATION – 6411EHC OR 6431EHC

NOTES FOR THE GUIDANCE OF THE EXPORTER AND CERTIFYING OFFICIAL VETERINARIAN

**Associated Documents:**

- **Either:**
  - 6411EHC (for direct export to Russia)
  - 6431EHC (for export to Russia via an establishment within an EU Member State)

- **and**
  - 618NDC, 6411SCH

**For products containing pork:**

- 6411SUP

To check if additional monitoring for microbiological and chemico-toxicological criteria is required for the finished food product intended for export (and guidance on the sampling frequency), consult the following:

- 6416NFE (for products containing meat);
- and/or
- 6409NFE (for products containing milk).

**IMPORTANT NOTE:**

The certificate is based on an EU-Russia agreed model certificate which reflects the requirements laid down in the legislation of the Russian Federation. As a result, the wording and the details cannot be amended. However, the following guidance has been prepared on the basis of information from the EU Council and European Commission, and bilateral correspondence with the Russian Federation. Provided the guidance notes below are followed or relied upon, the certificate may be signed.

Unless otherwise stated, any reference to ‘certificate’ shall mean both the 6411EHC and 6431EHC.

1. **CERTIFICATION BY AN OFFICIAL VETERINARIAN**

   This certificate may be signed by a Local Veterinary Inspector appointed by the Department for Environment, Food and Rural Affairs (Defra), Scottish Government, Welsh Government, or an Authorised Veterinary Inspector (AVI) appointed by the Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA), who is an Official Veterinarian (OV) on the appropriate panel for export purposes. OVs/AVIs should sign and stamp the health certificate with the OV/AVI stamp in any colour OTHER THAN BLACK.

   The Russian authorities may require bespoke approval of the manufacturing establishment of origin and/or countersignature of the certificate by a Russian veterinary inspector prior to despatch. The import permit should be consulted to establish what is required.

   A certified copy of the completed certificate must be sent to the issuing office within seven days of issue.

   The OV/AVI should keep a copy for his/her own records.

2. **SCOPE**

   The certificate (6411EHC) can be used for the final export to Russia of products derived from animals resident in the UK, or products obtained from other Member States (MSs) provided they were derived from animals resident in those Member States. In the latter case, the products MUST have been accompanied by a pre-export certificate similar to the certificate being issued for this final export, AND the details in the table above section 4.1 completed (or the 6411SCH completed, see paragraph 10 below for details). The certificate is for the export of a food product which is packaged for the final consumer (i.e. finished)
containing ingredients of animal origin, and for 'composite products', defined as foodstuffs intended for human consumption which contain both processed products of animal origin and products of plant origin. The EU has proposed to the Russian Federation that some composite products should be exempt from veterinary certification – please see draft guidance at Annex 1. If it is intended to export 'exempt' products, exporters are advised to study the import permit carefully to ensure no veterinary certification is required.

3. FINISHED FOOD PRODUCTS CONTAINING PORK / PORK PRODUCTS (6411SUP)
If the animal product to be exported contains any pork ingredient, 6411SUP must be certified in addition to 6411EHC. This annex/supplementary certificate provides options for the inactivation of the African Swine Fever (ASF) virus.

All non-applicable options must be deleted to leave only the treatment/s applied.

Compliance with the treatment/s option may be certified on the basis of:
- knowledge of the production process operating in the establishment;
- checks on company records of processing, quality control etc. for the batches certified;
- HACCP plans

4. This guidance can also be used for signing a pre-export certificate, containing similar requirements (6431EHC), for the despatch of products meeting the Russian requirements to other MSs, for ultimate export to Russia.

General information (Sections 1-3 refer)

5. Country of transit (Section 1.4): This refers to the third country of transit, NOT to EU MSs through which the consignment will pass.

6. Certificate No: (Section 1.5): This MUST consist of the prefix ‘GB’ (ISO Country Code for the UK), followed by a unique number in CENTAUR format i.e. year/AHDO number/sequential number. The prefix ‘GB’ is pre-printed on the certificate. The unique number MUST be printed on the certificate; if this number is entered in manuscript, the certificate will be INVALIDATED.

7. Country of origin (Section 1.6): This is the country of origin of the raw material used in the product which must be an EU Member State. If the final certificate is being issued solely on the basis of pre-export certificates from other EU Member States, the country of origin will NOT be UK (the certifying MS, which goes at Section 1.7 and has been pre-printed).

8. Point of crossing the border of the Russian Federation (Section 1.10): The OV must ask the exporter for this information.

9. Establishment details (Section 3.1) and Administrative-territorial unit (Section 3.2): This refers to approval by the Food Standards Agency (FSA) under GB legislation which implements EU law. The Administrative-territorial unit is the AHDO responsible for the area in which the establishment of despatch is located. However, for the purposes of regionalisation, the administrative territory is the County.

Veterinary certification (Section 4 refers)

10. Pre-export certificate details: As explained above, the table above section 4.1. must be completed if the products were derived from animals resident in another MS or products derived from
establishments located in other MSs. If more than two pre-export certificates are used, “See attached schedule” should be entered in the table and document 6411SCH should be completed. Note that for any continuation documents (i.e. the 6411SCH) the importing authorities will be expecting these to include all security features of the original certificate (e.g. watermarked paper).

11. Sections 4.1, 4.2, 4.4, 4.6 and 4.8: This can be signed on the basis of the following:

These may be certified on the basis of oval marks which demonstrate compliance with EU Regulations (EC) 853/2004 and 854/2004. All ingredients making up the product MUST be traceable throughout the supply chain. In the UK, the EU Regulations are implemented by the Food Hygiene Regulations 2006. In addition to this general principle, the following should also be taken into account when signing the certificate:

- Ensure that any starting material of animal origin used in the product meets the specific food hygiene Regulations, which for meat, milk, shellfish etc. can be established by the EU oval mark.
- Ensure that the finished product meets the requirements of the Food Hygiene Regulations 2006. For meat products, milk-based products and shellfish etc, this can be ascertained by the EU oval mark (but see below for the additional monitoring necessary to comply with the Russian microbiological and chemico-toxicological requirements).
- Approval and supervision of milk/meat/products establishments can be delegated by the ‘Competent Veterinary Service’ to a service which has competence in this area, when EU legislation provides for such a delegation of competence. In the case of Great Britain, this has been delegated to the FSA. According to the information obtained from the EU, the establishments supplying meat/milk/fish intended to be used in the finished food product do not have to be listed on the Rosselkhoznadzor website, but all ingredients in the finished food product must be traceable to source.

12. Section 4.3:

- From 1 July 2011, bovine meat placed on the EU market (i.e. from animals tested for BSE if over 72 months old, with negative results) is acceptable for use in the finished food products on this basis. Russia will accept such meat as long as no BSE case has been confirmed in an animal younger than 5 years during the previous 3 years (the default position). If this position changes, this guidance notes will be updated to make it clear that finished food products containing beef should not be certified as the other option – for bovine animals to be tested if 48 months or over (with negative results) – will not be practical to implement just for exports to Russia.

- “derived from animals that originate from premises free of BSE and scrapie” should be interpreted as ‘at the time of movement for slaughter, the herd/flock was not under any BSE or scrapie related restrictions’. The UK does not put the whole herd under restrictions because of BSE, hence for BSE no additional checks are necessary. In the case of scrapie, flocks will be put under movement restrictions when scrapie is confirmed, for genotyping; the resistant genotypes may, however, be slaughtered for human consumption. Thus, additional checks will be necessary to ensure that the meat is not derived from animals which are from holdings still under restrictions while genotyping is carried out. A support certificate to this effect from the slaughter house and flock of origin may be required.
• “do not belong to birth cohorts of BSE positive animals” means ‘not born in the same herd as the affected bovine animal, and within 12 months preceding or following the birth of the affected animal’. The UK has begun to cull such cohorts since meat from animals over thirty months old (OTM) was allowed into the human food chain from November 2005, subject to a negative BSE test.

12. Section 4.6: This requires products to originate from establishments or cold stores in administrative territories free from the former OIE list A diseases mentioned in the bullet points underneath, at the time of manufacture of the product. This can be certified on behalf of the Department provided written authority to do so on form 618NDC has been obtained from the issuing office within 10 days of shipment.

13. Section 4.7 (6431EHC)/ 4.8 (6411EHC):

The criteria are generally stricter than those of the EU and depends on the type of product. This means that additional monitoring for microbiological (especially for ready-to-eat products) and chemico-toxicological criteria will be required. Guidance on the sampling frequency and links to the specific criteria for specific products (where they exist) can be found in 6416NFE for meat/products and 6409NFE for milk/products. These guidance documents must be consulted first to establish if specific criteria exist for the finished product intended for export. In the absence of such criteria, the following guidance must be followed which is based on EU legislation:

Microbiological: Foodstuffs of animal origin may present intrinsic hazards, due to microbiological contamination. To protect consumers from microbiological risks in food products, Community legislation sets out numerous hygienic measures (such as HACCP based principles, meat inspections, etc). In particular, microbiological criteria have been laid down for specific foodstuffs - Regulation (EC) No 2073/2005 on the microbiological criteria for foodstuffs refers - which the Regulation mentioned above addresses. These criteria are applicable at the site of food production as well as in the framework of Intra-Community trade. Microbiological criteria are tools that can be used in assessing the safety and quality of foods. Due to reasons related to sampling, methodology and uneven distribution of micro-organisms microbiological testing of finished food products done alone is however insufficient to guarantee the safety of a foodstuff tested. The safety of the foodstuffs must principally be ensured by a more preventative approach, such as product and process design and the application of Good Hygiene and Manufacturing Practices (GHP, GMP) and the Hazard Analysis Critical Control Point (HACCP) principles. If the manufacturing plant has such a HACCP plan, then community rules will be met.

Chemical-toxicological: Council Directive 96/23/EC is implemented by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997 and a programme referred to as the National Surveillance Scheme (NSS).

Radiological: Current EU limits for radionuclides in food only apply to agricultural imports from third countries contaminated by the Chernobyl accident (EC Regulation 737/90 and amendments). This establishes a limit for Cs-134 + Cs-137 of 600 Bq/kg. However, the EU has recommended that milk and mixed diets are monitored in the Member State of origin. In support of this recommendation, the FSA monitors milk at several dairies across the UK and complete meals from large consumption areas such as canteens or restaurants. The FSA, in association with the environment agencies, publishes an annual report - Radioactivity in Food and the Environment - which summarises the results of such monitoring and any additional monitoring carried out on the basis of risk e.g. around the nuclear sites. The results of these monitoring in 2003 demonstrate that even the most exposed members of the public received radiation doses from consumption of food and exposure to environmental radioactivity due to
discharges and direct radiation that were below the statutory United Kingdom annual dose limit to members of the public of 1 mSv (millisievert) i.e. below European Union limits and within Government targets.

Current Codex guideline levels for radionuclides (in internationally traded food) only apply following accidental nuclear contamination.

14. DISCLAIMER
This certificate is provided on the basis of information available at the time and may not necessarily comply fully with the requirements of the importing country. It is the exporter’s responsibility to check the certificate against any relevant import permit or any advice provided by the competent authority in the importing country. If these do not match, the exporter should contact the Centre for International Trade – Carlisle, via the link below:

ANNEX 1

VETERINARY CERTIFICATION OF COMPOSITE PRODUCTS

In order to clarify veterinary certification of exports of composite products from the EU to Russia, the Parties have agreed as follows:

1. “Composite product” means a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin.

2. Composite products exported from the EU to the Russian Federation have to be accompanied by the “Veterinary certificate for finished food products”.

3. By way of derogation from paragraph 2, composite products not containing any meat product but containing less than half of their substance of any other product of animal origin are exempted from veterinary certification provided they are:
   
   (a) shelf-stable at ambient temperature, or by their appearance and characterisation have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance, so that any raw product is denatured;
   
   (b) clearly identified as intended for human consumption;
   
   (c) securely packaged or sealed in clean containers; and
   
   (d) accompanied by a document and labelled, so that the document and labelling together give information on the nature, quantity and number of packages of the composite product, the country of origin, the manufacturer, and the ingredient.

4. As a further derogation from paragraph 2, the following composite products are exempted from veterinary certification:

   (a) Biscuits
   (b) Bread
   (c) Cakes (excluding any fresh cream content)
   (d) Chocolate
   (e) Confectionery (including sweets)
   (f) Unfilled gelatine capsules
   (g) Health foods and supplements containing small amounts of animal product, and those including glucosamine, chondroitin, or chitosan
   (h) Meat extracts and meat concentrates
   (i) Mayonnaise made from pasteurised eggs
   (j) Olives filled with products of animal origin other than meat products
   (k) Pasta and noodles not mixed or filled with meat product
   (l) Soup stocks and flavourings containing meat extracts, meat concentrates, fish powders or fish extracts or animal fats