

No:

EXPORT OF SALTED SHEEPSKINS FOR EXCLUSIVE USE IN TANNERIES IN THE REPUBLIC OF ARGENTINA

NOTES FOR THE GUIDANCE OF THE CERTIFYING OFFICIAL VETERINARIAN

Associated Documents: 2803EHC and 618NDC

IMPORTANT

These notes provide guidance to Official Veterinarians (OV) and exporters. The NFG should have been issued to you together with export certificate 2803EHC. The NFG should not be read as a standalone document but in conjunction with certificate 2803EHC. We strongly suggest that exporters obtain full details of the importing country's requirements from the veterinary authorities in the country concerned, or their representatives in the UK, in advance of each consignment

1. Scope

Export health certificate **2803EHC** may be used for the export of salted sheepskins from the UK to a tannery in Argentina (see paragraph 4 below).

Because the wording of the certificate does not allow for the exclusion of UK origin skins, each consignment **must** contain at least one sheepskin obtained from an animal which was born and kept since birth in the UK.

However, providing that the relevant requirements of the certificate can be met, each consignment **may additionally** contain sheepskins taken either from animals slaughtered outside the UK and/or from animals born outside the UK but slaughtered in the UK.

2. Certification by an Official Veterinarian (OV)

This certificate may be signed by an OV appointed by the Department for Environment, Food and Rural Affairs, the Scottish Government, Welsh Government or the Department of Agriculture, Environment and Rural Affairs (DAERA) Northern Ireland, who is on the appropriate panel for export purposes or who holds the appropriate Official Controls Qualification (Veterinary) (OCQ(V)) authorisation.

OVs must sign and stamp the health certificate with the OV stamp in any ink colour **OTHER THAN BLACK**.

Foreign text: The Official Veterinarian should note that the foreign text in the certificate is an official translation of the English text and the Official Veterinarian is accordingly authorized to complete the export health certificate, even if they are unable to read and understand the meaning of the foreign text. Any spaces in the foreign text must be left blank and English wording must not be entered. However, if the Official Veterinarian is able to read and write the foreign text and if facilities are available to enter the foreign text in type, the Official Veterinarian can enter the information where appropriate.

Certified Copy Requirements - England, Wales and Scotland

Guidance concerning return of certified copies of EHCs has changed and only specific certified copies are required to be returned to the APHA. Certifying OVs must return a certified copy of EHCs only for

the following EHC types:

- if the exported commodity is cattle, pigs, sheep, goats or camelids;
- if the certificate was applied for manually and the application documents have been emailed to APHA and not applied for via the Exports Health Certificates Online (EHCO) system.

Certified copies should be emailed on the day of signature to the Centre for International Trade Carlisle (CITC) at the following address: certifiedcopies@apha.gov.uk.

For certificates that have been issued to the Certifying OV via the EHCO system, the Certifying OV must complete the certifier portal with the status of the certificate and the date of signature.

A copy of all EHCs and supporting documentation certified must be retained for two years.

Certifying OVs are not required to return certified copies of other EHCs issued, however CITC may request certified copies of EHCs and supporting documentation in order to complete Quality Assurance checks or if an issue arises with the consignment after certification.

DAERA Export Health Certificates: Provision of certified copies

aPVPs certifying DECOL produced Export Health Certificates must return a legible, scanned copy of the final EHC to the relevant DAERA Processing Office within 1 working day of signing.

Good quality photographic copies will be accepted by the department, where obtaining a scanned copy is not feasible - for example, where 'on site' certification is undertaken and scanning facilities are not available.

For record purposes, a copy of the final Export Health Certificate and associated Support documents should be retained by the aPVP for a period of 2 years from the date of certification.

The Department will carry out periodic audits of all aspects of export certification to ensure that a high standard of certification is being maintained.

3. Production facility official control number

Paragraph II(a) refers. The approval or registration number of the production establishment should be entered as the official control number in this paragraph.

For EU establishments handling untreated skins, the official control number will be that allocated in accordance with the establishment's approval under Regulation (EC) 1069/2009 (as amended). In the case of EU establishments handling skins treated elsewhere, the official control number will be that allocated in accordance with the establishment's registration under Regulation (EC) 1069/2009 (as amended). In England, Regulation (EC) 1069/2009 (as amended) is enforced by the Animal By-Products (Enforcement) (England) Regulations 2013 (as amended). Similar legislation exists in Scotland, Wales and Northern Ireland.

Certifying OV's are advised that, in accordance with Articles 54 and 55 of Regulation (EC) 1069/2009, references to Regulation (EC) 1774/2002 shall be construed as references to Regulation (EC) 1069/2009 and that establishments, plants and users approved or registered in accordance with Regulation (EC) 1774/2002 before 4 March 2011 shall be deemed to be approved or registered, as required, in accordance with Regulation (EC) 1069/2009.

Alternatively, if the sheepskins are salted in the originating EU slaughterhouse, then the official control number will be that allocated in accordance with approval under the EU Hygiene package, including Regulations (EC) 853/2004 on the hygiene of foodstuffs, 854/2004 laying down specific hygiene rules for food of animal origin and 853/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption. In England, the EU Hygiene package is implemented and enforced by the Food Hygiene (England) Regulations 2006 (as amended). Similar legislation exists in Scotland, Wales and Northern Ireland.

However, EU slaughterhouses which salt sheepskins originating from other slaughterhouses or establishments require a salting facility approved in accordance with Regulation (EC) 1069/2009 (as amended) as described above.

4. Consignee

Paragraph III(b) refers: This export health certificate is for the export of sheepskins for "exclusive use in tanneries in the Republic of Argentina". The OV should therefore seek verification, including from the exporter, that the consignment is destined for a tannery and is not intended to be used in any way for human or animal consumption.

5. Health information

Paragraph IV may be certified on the basis of the following specific guidance in conjunction with any necessary evidence resulting from the OV's familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the processing establishment supported as necessary by physical inspection and examination of relevant documentation and/or records including commercial documentation and veterinary statements:

- (a) Paragraphs IV(a) and IV(d) must be certified in all cases. When certifying imported sheepskins or sheepskins obtained from imported animals, these paragraphs should be interpreted within the context of the country of origin and the permitted deletable options.
- (b) **Imported products or animals:** Paragraphs IV(b) and IV(c) refer. For the purposes of this certificate, references to products or animals being imported into the UK from third countries should be interpreted to mean bringing products or animals into the UK from any other country, including other EU member states.
- (c) Paragraphs IV(b) and IV(c) refer. These paragraphs need to be certified if the consignment contains sheepskins obtained from imported animals or imported sheepskins respectively.
- (d) **Disease clearances:** Paragraphs IV(a)1, 2, 3 and 4 refer.

of origin, either paragraphs IV(a)1, 2 and 4 or paragraphs IV(a)1, 3 and 4 must be certified.

1. If the countries of origin are **free** of foot and mouth disease, paragraphs IV(a)1, **2** and 4 must be certified:

- (i) In the case of sheepskins obtained from animals born and raised in the UK, these paragraphs may be signed with respect to the UK on behalf of the Department provided written authority to do so has been obtained from the issuing office of APHA or DAERA on form **618NDC**.

If the UK is not currently free of anthrax, a **618NDC** may still be issued in support of paragraph IV(a)4 if it can be confirmed that the UK farms of origin were not under animal movement restrictions due to the control of anthrax.

- (ii) In the case of sheepskins obtained from imported animals or imported sheepskins, confirmation that the country of origin is free of peste de petits ruminants, sheep pox, goat pox, foot and mouth disease and anthrax may be certified by reference to the website of the World Organisation for Animal Health (still known by its historical acronym, OIE):

<http://www.oie.int/wahid/>

or by reference to supporting veterinary documentation from the competent authority of the country of origin. Supporting evidence confirming regional freedom from foot and mouth disease and farm freedom from anthrax may be relied upon as an alternative to country freedom from these two diseases.

2. If the countries or regions of origin are **not free** of foot and mouth disease, paragraphs IV(a)1, **3** and 4 must be certified:

- (i) In the case of sheepskins obtained from animals born and raised in the UK, paragraphs **IV(a) 1** and **4** may be signed with respect to the UK on behalf of the Department provided written authority to do so has been obtained from the issuing office of APHA or DAERA, on form **618NDC**.

If the UK is not currently free of anthrax, a **618NDC** may still be issued in support of paragraph IV(a)4 if it can be confirmed that the UK farms of origin were not under animal movement restrictions due to the control of anthrax.

- (ii) In the case of sheepskins obtained from imported animals or imported sheepskins, confirmation that the country of origin is free of peste de petits ruminants, sheep pox, goat pox, and anthrax may be certified by reference to the website of the World Organisation for Animal Health (still known by its historical acronym, OIE):

<http://www.oie.int/wahid/>

or by reference to supporting veterinary documentation from the competent authority of the country of origin. Supporting evidence confirming farm freedom from anthrax may be relied upon as an alternative to country freedom from anthrax.

- (iii) Paragraph **IV(a) 3** refers. This paragraph requires that the skins have either been salted as described or have been subjected to an alternative treatment which has been specifically approved by the Argentinean authorities.

Confirmation of the treatment applied to the skins in the consignment may be certified on the basis of the OV's familiarity with the processing arrangements in place at the processing establishment supported, as necessary, by physical inspection and examination of relevant documentation or certification.

If an alternative treatment is used, then this must be a treatment which is included in the OIE's Terrestrial Animal Health Code as a procedure for inactivating the foot and mouth disease virus in raw skins and which has been specifically approved by the Argentinean authorities. These two requirements may be verified by reference to the OIE's Terrestrial Animal Health Code via the website below:

<http://www.oie.int/en/international-standard-setting/overview/>

and on sight of written confirmation from the Argentinean authorities that they have officially approved and accepted the proposed alternative treatment method for use on skins.

(e) **Born and bred clause:**

Paragraph IV(a)5 refers. This paragraph can be certified providing that some of the skins were derived from animals that were born, reared and slaughtered in the UK. This can be certified on the basis of the OV's knowledge of the arrangements for sourcing, procurement, segregation, processing, handling and storage at the processing establishment. This may be supported as necessary by examination of relevant documentation and/or records including commercial documentation.

As indicated at paragraph 1 of these NFG, this certificate (2803EHC) can be used for the export of sheepskins obtained from animals born and kept since birth in the UK and, if required, in combination with sheepskins from:

- (a) animals born outside the UK but slaughtered in the UK;
- (b) animals slaughtered outside the UK.

If the consignment for export also includes skins obtained from imported animals or from animals slaughtered outside the UK, both paragraph IV(a)5 and either paragraph IV(b) or IV(c) need to be certified, as appropriate.

(f) **Authorised facility and ante- and post-mortem inspection for clinical signs of infectious or parasitic diseases:**

Paragraph IV(a)6 refers. The reference to the authorised facility (slaughterhouse) being approved by the veterinary authorities of the UK may be interpreted as meaning a slaughterhouse meeting the requirements of the EU Hygiene package, including Regulations (EC) 852/2004 on the hygiene of foodstuffs, 853/2004 laying down specific hygiene rules for food of animal origin and 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption. This may therefore include slaughterhouses located in the UK, the rest of the EU or countries outside the EU which may legitimately send skins to the UK.

The reference to the absence of clinical signs of infectious diseases can be certified on the basis that the animals were slaughtered in authorised slaughterhouses and were free from the major diseases specified in paragraphs IV(a) (1), IV(a) (2) and IV(a) (4) namely peste des petit ruminants (PPR), sheep pox, goat pox, foot and mouth disease and anthrax. If these diseases were present they would have been detected at ante-mortem or post-mortem inspection of the animals involved.

Absence of clinical signs of parasitic diseases that can be transmitted through the skins can be certified on the basis that animals that are grossly affected by parasitic disease should not be submitted for slaughter and that sheepskins which are grossly parasitised will be rejected for processing. Any residual parasitic infection will be removed by the slaughter process and the processing of the hide.

Paragraph IV(a)7 refers. This paragraph can be certified on the basis that the animals were slaughtered and processed in an approved facility as indicated above and that meat, from the group of animals slaughtered and whose skins were removed, has been declared fit for human consumption.

(g) **External parasites:**

Paragraphs IV(a)8 and IV(a)9 refer. With respect to freedom from external parasites at paragraph IV(a)8, this paragraph can be certified on the basis that the skins are not obviously parasitised based on the OV's inspection and information from the exporter.

It is however envisaged that the storage option at Paragraph IV(a)9 would be the more likely option to be certified. The duration of storage after slaughter can be certified on the basis of the OV's knowledge of the processing, handling and storage at the processing establishment, examination of skins in the consignment and supported by checks on records provided by the processor.

(h) **Cleanliness of skins:**

Paragraph IV(a)10 refers. Animals slaughtered in slaughterhouses with the intention of producing meat for human consumption are expected to have met appropriate cleanliness standards prior to slaughter with respect to the presence of soil, dung and bedding material. In addition, the cleanliness of the skins may be verified on the basis physical examination

of skins in the consignment in conjunction with the OV's knowledge of the processing, handling and storage at the processing establishment.

- (i) **Imported skins or skins from imported animals:**
Paragraphs IV(b) and IV(c) refer.

If the consignment does NOT include skins originating from imported animals slaughtered in the UK or skins obtained from animals slaughtered outside the UK, the words 'NOT APPLICABLE' should be entered instead of the country of origin.

If the consignment for export does include skins originating from imported animals slaughtered in the UK or skins obtained from animals slaughtered outside the UK, paragraphs IV(a)1-4 of the certificate as described above must be certified as appropriate.

Certifying OVs are reminded that the country of origin of the animals or of the skins must be a country whose disease status is recognised by the Argentinean authorities, as indicated in the relevant footnote of the certificate. Certification of the disease status of other countries can be provided on the basis of information provided on the OIE's World Animal Health Information Database website at:

<http://www.oie.int/wahid/>

With respect to skins obtained from imported animals, the compliance of a third country with all the requirements specified under paragraphs IV(a)1, 3 and 4 can be certified on the basis that under Council Directive 90/425/EEC (as implemented in England by the Animals and Animal Products (Import and Export) (England) Regulations 2006), sheep imported from EU member states must be free from the diseases specified in these paragraphs. Similar parallel legislation is in place in Scotland, Wales and Northern Ireland.

Council Directive 91/496/EEC sets out similar general conditions for live animals imported into the EU from countries outside the European Union. This Directive is also implemented in England by the Animals and Animal Products (Import and Export) (England) Regulations 2006. Similar parallel legislation is in place in Scotland, Wales and Northern Ireland.

- (j) **Transportation:**
Paragraph IV(d) may be certified on the basis of compliance with the handling and transport requirements laid down under Regulations (EC) 1069/2009 (as amended) and 142/2011 (as amended).

In England, these Regulations are enforced by the Animal By-Products (Enforcement) (England) Regulations 2013 (as amended). Similar legislation exists in Scotland, Wales and Northern Ireland.

6. If declarations are relied upon to support the completion of this certificate, these must be signed by someone who has knowledge of and responsibility for the relevant parts of the production process. The managing director (or equivalent) of the company should provide a

letter giving the name(s) and job title(s) of those authorised to give the declaration and the basis on which the declaration is made.

The declaration should include a clause indicating that the signatory is aware that making a false declaration is an offence and that he/she accepts full responsibility if any problems arise with the export should there be any dispute relating to the matters being declared.

The RCVS Guide to Professional Conduct 2012 states that [Veterinary Surgeons] "must not recklessly confirm what other people have stated". Where possible, supporting evidence for declarations should be called for and put on file.

7. **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 APHA Centre for International Trade, Carlisle or DAERA, via the link or e-mail address below:

<https://www.gov.uk/guidance/contact-apha>

DAERA - Email: vs.implementation@daera-ni.gov.uk