

VETERINARY CERTIFICATE FOR ANIMAL FEED OF PLANT ORIGIN EXPORTED TO THE EURASIAN ECONOMIC UNION - 7648EHC

OFFICIAL PRE-EXPORT SUPPORT CERTIFICATE FOR THE MOVEMENT OF ANIMAL FEED OF PLANT ORIGIN BETWEEN MEMBER STATES OF THE EU AND INTENDED FOR EXPORT TO THE EURASIAN ECONOMIC UNION - 8052EHC

NOTES FOR THE GUIDANCE OF THE OFFICIAL VETERINARIAN AND EXPORTER

Associated Documents:

7648EHC (for direct export to the Eurasian Economic Union)

or

8052EHC (for export to the Eurasian Economic Union via an establishment within an EU Member State)

These notes provide guidance to Official Veterinarians (OV) and exporters. The NFG should have been issued to you together with export certificate 7648EHC or official pre-export certificate 8052EHC. The NFG should not be read as a standalone document but in conjunction with the certificate. 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.

IMPORTANT NOTE: Certificates 7648EHC and 8052EHC are based on a model certificate laid down under legislation in force in the Eurasian Economic Union. As a result, the wording and format cannot be amended. Deletions, as appropriate, are allowed only as stated in the certificate. 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 7648EHC and 8052EHC.

1. SCOPE

Certificate 7648EHC may be used for the export from the UK of animal feeds or animal feed materials containing or made using materials of plant origin to the Eurasian Economic Union.

This certificate must NOT be used for products containing or made using any materials of animal origin. Alternative certification should be obtained for these types of products.

The Eurasian Economic Union currently consists of five member countries <http://www.eaeunion.org/?lang=en#about-countries>

The Republic of Armenia
The Republic of Belarus
The Republic of Kazakhstan
The Kyrgyz Republic
The Russian Federation

Although this certificate may be used to accompany consignments to the member countries of the Eurasian Economic Union, information from the European Commission suggests that this certificate is not necessary for consignments of plant-based feedingstuffs destined for the Russian Federation. Exporters wishing to export to the Russian Federation are therefore advised to verify, via their Russian contacts, if this certificate is required for their products.

Pre-export certificate **8052EHC** may be used for the movement of plant-based animal feeds or animal feed materials to an establishment in another EU Member State where the consignment may be manipulated in some way (e.g. further processed, mixed, re-packaged, split or consolidated with additional products) before eventual onward shipment to a member country of the Eurasian Economic Union.

If any of the product present in the consignment originates from another EU Member State, this must have been accompanied into the UK by an official pre-export certificate (similar in content and format to the **8052EHC**) and issued by the competent authority of that EU Member State. The details of any relevant official pre-export certificates must be entered in the table at the beginning of **Section 4** of the **7648EHC** or **8052EHC** (as appropriate).

Imported (i.e. from a country outside the EU) product may be exported to Eurasian Economic Union provided that it fulfils the relevant Eurasian Economic Union import conditions as set out in this certificate.

If there are specific Eurasian Economic Union import conditions that go beyond EU import rules, the imported product must be accompanied by additional certification certifying compliance with those specific Eurasian Economic Union conditions in addition to the usual certification issued in accordance with standard EU import rules for the product.

If additional certification is provided in relation to imported product, no reference should be made to this additional certification in the final export certificate (at **Section 4**) to the Eurasian Economic Union.

Approval of Manufacturing Establishments

Rosselkhoznadzor (Russia's **Federal Service for Veterinary and Phytosanitary Surveillance**) publishes lists of establishments which they have approved to manufacture certain commodities for export to the Russian Federation. This is in addition to the standard approval or registration required under UK legislation.

Rosselkhoznadzor's lists of approved establishments are published on their website at:

http://fsvps.ru/fsvps/importExport?_language=en

Establishments appearing on one or more of the lists published by Rosselkhoznadzor may be considered to also be approved to export the specified commodity to other members of the Eurasian Economic Union.

However, it is not clear if this additional approval is a prerequisite for exports of the products covered by this certificate or if it is required by other member countries of the Eurasian Economic Union.

Exporters are therefore strongly advised to verify, via their contacts in the destination member country of Eurasian Economic Union, whether or not this additional approval is required in relation to their proposed export.

Establishments which have been advised that they must appear on one of Rosselkhoznadzor's lists should contact Animal and Plant Health Agency (APHA) Specialist Service Centre for International Trade, in Carlisle, or DAERA, for further information on how they can apply for approval.

However, it should be noted that Rosselkhoznadzor has declined to add any new UK animal feed or pet food establishments to their lists for several years and that their rejections do not appear to be specifically related to veterinary or sanitary non-compliance.

2. **CERTIFICATION BY AN OFFICIAL VETERINARIAN**

This certificate may be signed by an Official Veterinarian 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 and Official Veterinarian (OV) on the appropriate panel for export purposes, or who holds the appropriate Official Controls Qualification (Veterinary) (OCQ(V)) authorisation.

OVs/AVIs should sign and stamp the health certificate with the OV/AVI stamp in any colour **OTHER THAN BLACK**.

Certificates issued in **Northern Ireland** may be printed on more than one sheet of A4 if they are more than 3 pages long, rather than a single sheet of A3. In these cases, the certifying OV should **fan stamp** the separate A4 sheets forming the certificate in addition to applying the main stamp at the end of the certificate. OVs may want to obtain advice from the issuing office on how to apply fan-stamping for exports to the Eurasian Economic Union.

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.

A certified copy of the completed certificate must be sent to the Animal and Plant Health Agency (APHA) Specialist Service Centre for International Trade, in Carlisle, or to DAERA, within seven days of issue.

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

3. **GENERAL INFORMATION (SECTIONS 1-3 REFER)**

Particular attention should be paid to the accuracy of the information entered onto the certificate as this information can be subject to close scrutiny at the Eurasian Economic Union's borders.

Incorrect references to dates, code numbers, approval numbers or misspelling of names and addresses can be sufficient cause for consignments to be detained or rejected by Eurasian Economic Union officials.

(a) **COUNTRY OF TRANSIT (SECTION 1.4):**

This refers to any *country* of transit, including EU MSs, countries of the Eurasian Economic Union and any Third Countries through which the consignment will pass on its way to the final destination.

- (b) **CERTIFICATE NO: (SECTION 1.5):**
 This MUST consist of the prefix 'GB' (ISO Country Code for the UK), followed by a unique number in the following format i.e. GB/two digits for the year/issuing office identifier number(2 for Carlisle SSC & 3 for DAERA) /five digit sequential number. The prefix 'GB' is pre-printed on the certificate. The unique number MUST also be printed on the certificate; if this number is entered by hand or with a typewriter the certificate will be INVALID.
- (c) **COUNTRY OF ORIGIN OF GOODS (SECTION 1.6):**
 This should be entered (preferably pre-printed) as 'UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND (GB)'
- (d) **CERTIFYING MEMBER STATE IN THE EU (SECTION 1.7):**
 This should be pre-printed in the certificate as 'UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND (GB)'
- (e) **COMPETENT AUTHORITY IN THE EU (SECTION 1.8):**
 This should be pre-printed as 'DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS (DEFRA) OF UK'.
- (f) **ORGANIZATION IN THE EU ISSUING THE CERTIFICATE (SECTION 1.9):**
 This should be pre-printed as either:
 'ANIMAL AND PLANT HEALTH AGENCY' for consignments certified in Great Britain.
 OR
 'DEPARTMENT OF AGRICULTURE, ENVIRONMENT AND RURAL AFFAIRS NORTHERN IRELAND' for consignments certified in Northern Ireland.
- (g) **POINT OF CROSSING THE BORDER OF THE EURASIAN ECONOMIC UNION (SECTION 1.10):**
 The OV must ask the exporter for this information.
- (h) **ORIGIN OF GOODS (SECTION 3.1):**
 Establishments producing animal feeds or animal feed materials must be approved or registered in accordance with Regulation (EC) 183/2005 laying down requirements for feed hygiene. In England, this is enforced by the Feed (Hygiene and Enforcement) (England) Regulations 2005 (as amended). Similar legislation exists in Scotland, Wales and Northern Ireland.

 The appropriate approval or registration number should be entered into this section and this number should reflect the number which is used on product labels or on other paperwork associated with the export.
- (i) **ADMINISTRATIVE-TERRITORIAL UNIT (SECTION 3.2):**
 The Administrative-territorial unit may be interpreted to mean the county in which the manufacturing establishment is located.

4. **VETERINARY CERTIFICATION (SECTION 4 REFERS)**

Taking into consideration the additional guidance below, the health attestation may be certified on the basis of the OV's familiarity with the sourcing, processing, handling and storage arrangements in place at the processing establishment and/or examination of relevant records and documentation.

- (a) **PRE-EXPORT CERTIFICATES:** As explained above, if the product originated from another EU Member State then the table at the beginning of **Section 4** must be completed with the details of the pre-export certificate(s) which accompanied the product into the UK (continuing on a separate sheet of paper if necessary).

If the product is of UK origin or was imported from a third country then the table need not be completed and the blank spaces in the table should be struck through and this amendment stamped and initialled in the usual way.

Note: Where the finished products originated from other EU Member States, a valid and relevant official pre-export certificate issued by the competent authority of the EU Member State may be used to support compliance with the conditions of the certificate. However, if there is any manipulation of the material whilst in the UK (mixing, re-packaging, storage etc), then the certifying OV should follow the guidance in these notes to ensure full compliance of the consignment as being dispatched from the UK; this is because the 'integrity' of the consignment is likely to be compromised, and further checks/tests are required.

(b) **Section 4.1**

This paragraph requires the manufacturing establishment to be located within an Administrative-Territorial Unit (ie county) which has not had a confirmed case of the named diseases during the last 12 months.

This paragraph may therefore be signed, with respect to either Administrative-Territorial Unit freedom or UK-wide freedom, on behalf of the Department provided written authority to do so has been obtained from APHA Specialist Service Centre - Exports, in Carlisle or the DAERA issuing office in Northern Ireland, on form **618NDC**.

(c) **Section 4.2**

EU monitoring and controls relating to Fusarium in grain focus on the maximum permitted levels of fumonisins and other mycotoxins produced by Fusarium rather than quantifying the actual level of Fusarium infection(referred to in the EHCs as fusariose).

Therefore the certifying OV may need to rely on documentary evidence such as suitably worded declarations from grain suppliers attesting that the grain they have supplied to the manufacturer did not show signs of infection by the Fusarium fungi (fusariose) exceeding 1% by weight. This may be supported by satisfactory laboratory test results derived from routine or specific mycotoxin monitoring programmes at the supplier and/or manufacturer to support the signing of this paragraph with respect to Fusarium.

In the absence of specific 'set standards' for heavy metals, mycotoxins and pesticides under Eurasian Economic Union legislation, the default position shall be compliance with EU and UK standards.

Council Directive 2002/32/EC sets maximum permitted levels for certain undesirable substances in animal feed such as heavy metals, aflatoxin and pesticides. This is given effect in England by the Animal Feed (England) Regulations 2010 (as

amended). Similar legislation exists in Scotland, Wales and Northern Ireland.

In addition, Commission Recommendations 2006/576/EC and 2013/165/EC establish guidance values for the maximum levels of several mycotoxins in products intended for animal feeding.

Again, the certifying OV may need to rely on documentary evidence such as suitably worded declarations from appropriate signatories, supported as necessary by satisfactory laboratory test results derived from routine or specific programmes monitoring levels of undesirable substances.

It is recommended that the certifying OV consult with the local authority inspector responsible for the manufacturing establishment for more specific guidance on feed hygiene legislation, including implementation, enforcement and confirmation of compliance.

In terms of the total beta activity of the feed, this part of the paragraph may be certified on the basis that the United Kingdom has a comprehensive programme in place to monitor radioactivity in food and the environment (RIFE). The RIFE reports regularly demonstrate that even the most exposed members of the UK public receive radiation doses from consumption of local food and exposure to environmental radioactivity (due to discharges and direct radiation) that were below the statutory EU annual dose limit to members of the public of 1 millisievert per year from artificially-produced radionuclides as set in the Council Directive 96/29/Euratom of 13 May 1996.

(d) Section 4.3

In the absence of any specific Eurasian Economic Union guidance, references to registered and non-registered lines shall be construed to be references to the authorisation status of genetically modified organisms (GMO) in accordance with UK and EU legislation.

This paragraph contains two statements relating to the presence of GMO, however, there is no option to delete as applicable. Therefore no text should be struck through or otherwise altered, regardless of whether one or both statements are being certified.

With regards to feed made without the use of GMO, Regulation (EC) No 1829/2003, on genetically modified food and feed, establishes a threshold for the adventitious or technically unavoidable presence of genetically modified material. This allows for a maximum contamination of feed by *authorised* GMO of 0.9%.

Regulation (EC) No 1829/2003 also provides transitional measures which allow for a maximum contamination of feed by *unauthorised* GMO of 0.5%.

On this basis it is expected that any feed product which is made without the intentional use of GMO and which is freely on sale in the UK and/or EU would satisfy the requirements of this paragraph.

(e) Section 4.4

In the absence of any specific Eurasian Economic Union requirements with respect to packaging materials used for animal feeds and animal feed materials, this paragraph may be certified on the basis of compliance with standard UK and EU practices.

(f) Section 4.5

In the absence of any specific Eurasian Economic Union requirements with respect to the treatment and preparation of the means of transport for animal feeds and animal feed materials, this paragraph may be certified on the basis of compliance with standard UK and EU practices.

5. Where 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.

Where possible, supporting evidence should be called for and put on file.

6. 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 (CIT) - Exports in Carlisle, via the link below:

<https://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening>

In Northern Ireland, contact the DAERA trade administration team:
e-mail- tradeadminpost@daera-ni.gov.uk

Phone - 02877442146