

## EXPORT OF NON-STERILISED PET FOOD TO THE REPUBLIC OF KOREA - 6389EHC

### NOTES FOR THE GUIDANCE OF THE OFFICIAL VETERINARIAN AND EXPORTER

Associated Document: 6389EHC

#### IMPORTANT

These notes provide guidance to Official Veterinarians (OVs) and exporters. The NFG should have been issued to you together with export certificate 6389EHC. The NFG should not be read as a standalone document but in conjunction with certificate 6389EHC. 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 OF THE CERTIFICATE

Export health certificate 6389EHC may be used for the export of **non-sterilised** processed pet food from the United Kingdom to the Republic of South Korea.

In accordance with **paragraph IV 2** the pet food may be made using meat of either UK or non-UK origin. However, in accordance with **paragraph IV 3** of the certificate, the pet food cannot contain any ruminant-derived protein, other than milk protein.

In accordance with **paragraph IV 7**, the exported pet food must have been produced in a pet food manufacturing plant located in the UK.

**Note:** Defra has been advised by the British Embassy in Seoul that **the South Korean authorities have complained about the quality of some of the completed 6389EHC certificates** they have been receiving.

An illegible or poorly presented certificate can be sufficient cause for a consignment to be detained or for trade restrictions to be imposed.

With this in mind, **exporters and Official Veterinarians are reminded that:**

- Certificates must be **accurate** and **legible**. If the information cannot be entered electronically, then block capitals should be used.
- If there is insufficient space to enter all the necessary information, **additional schedules or supporting documentation should be used**. These should **cross-refer** appropriately, be **securely attached** to the certificate and **fan-stamped**.
- All non-applicable deletable clauses should be struck through with a single horizontal black line, and initialed by the certifying officer.

#### 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 should sign and stamp the health certificate with the OV stamp in any colour **OTHER THAN BLACK**.

#### **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](mailto: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**

Authorised Private Veterinary Practitioners (aPVPs) certifying DAERA Export Certification On-Line (DECOL) produced EHCs 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. Paragraph I(a) - Identification of the product(s)**

The species and country of origin must be given for any ingredients of animal origin used in the manufacture of the consignment.

#### **4. Paragraph II(a) - Address of the processing plant**

As required by paragraph IV 7 of the certificate, the pet food processing plant must be located in the UK.

#### **5. Paragraph II(b) - Approval number**

Establishments handling unprocessed animal by-products or manufacturing products derived from unprocessed animal by-products

must be approved in accordance with the **Animal By-Products (Enforcement) (England) Regulations 2013** (as amended) or with parallel legislation in force in Scotland, Wales and Northern Ireland.

These statutory instruments currently enforce and implement the principles and controls laid down under **Regulation (EC) 1069/2009** (as amended).

Alternatively, establishments producing pet food or animal feedingstuffs from processed ingredients of animal origin require approval in accordance with the **Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015** (as amended) or with parallel legislation in force in Scotland, Wales and Northern Ireland.

These statutory instruments currently enforce and implement the principles and controls laid down under **Regulation (EC) 183/2005** laying down requirements for feed hygiene.

The approval number may be confirmed on sight of a valid approval or registration document or by reference to the responsible local APHA or DAERA office.

#### 6. **Paragraph IV - 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 facility. This should be supported as necessary by physical inspection and examination of relevant documentation and/or records including commercial documentation, veterinary statements and valid declarations.

- (a) **Paragraph IV 1 - Low risk material from healthy animals, the meat from which has been passed as fit for human consumption.** This paragraph relates to animal materials obtained from slaughtered animals and used in the manufacture of the pet food.

The raw (unprocessed) animal materials must be Category 3 material as referred to in Article 10(a) to(m) of Regulation (EC) No 1069/2009 (as amended), **and** obtained from slaughtered animals which passed both ante- and post-mortem inspection.

In England, the **Animal By-Products (Enforcement) (England) Regulations 2013** (as amended) enforces and implements the principles and controls laid down under **Regulation (EC) 1069/2009** (as amended). Equivalent legislation is in force in Scotland, Wales and Northern Ireland.

Additionally, certifying OVs are reminded that the abovementioned Category 3 material will not necessarily have come from animals whose meat was passed as being fit for human consumption. For example, Article 10(b) of Regulation (EC) No 1069/2009 (as amended) only requires that the material was obtained from animals which were considered fit to be slaughtered for human consumption following ante-mortem inspection; it does not specify that post-mortem inspection was been carried out or passed.

**The certifying OV must therefore make due inquiry** to verify that the Category 3 materials obtained from slaughtered animals

were passed as being fit for human consumption. In the case of animal materials derived from animals slaughtered outside the UK, the certifying OV should examine the documentation accompanying the animal material into the UK.

(b) **Paragraph IV 2 (a), (b) and (c) - Country of Origin**

The paragraph should be completed according to the country of origin of the animal ingredients used in the manufacture of the pet food.

For UK origin ingredients of animal origin, options (b) and (c) should be struck through.

For ingredients of animal origin from countries approved to export meat to The Republic of Korea, the name(s) of the countries should be entered at option (b), and option (a) and (c) should be struck through.

Countries approved to export meat to The Republic of Korea as of February 2020 are as follows:

|  |   |
|--|---|
| <b>Pork:</b>                                     | Netherlands, New Zealand, Denmark, Germany, Mexico, The USA, Brazil (Santa Catarina only), Sweden, Switzerland, Spain, Slovak Republic, Ireland, The UK, Austria, Italy (Processed pork meat only), Chile, Canada, Portugal, France, Finland, Australia |
| <b>Poultry meat (fresh, chilled and frozen):</b> | Netherlands, Denmark, USA, Brazil, Sweden, The UK, Chile, Canada, Thailand, France, Philippines (chicken only), Australia   |
| <b>Poultry meat (heat treated):</b>              | Netherlands, Denmark, USA, Brazil, Sweden, The UK, Japan, China, Chile, Canada, Thailand, Poland, France, Hungary, Australia  |

It is the responsibility of the exporter to seek confirmation from the import authorities that this list is up to date at the time of export.

For ingredients of animal origin from countries **not** approved to export meat to The Republic of Korea, the name(s) of the countries should be entered at option (c), and option (a) and (b) should be struck through.

If the product contains ingredients of animal origin originating from countries **not** approved to export meat to the Republic of Korea, one of the listed heat treatments must be applied. The corresponding box should be ticked.

(c) **Paragraph IV 3 - Absence of ruminant proteins**

The only ruminant-derived proteins which may be present in the consignment are those derived from milk.

(d) **Paragraph IV 4 - Contamination**

This paragraph can be certified on the basis of the certifying officer's familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the facility, and any other evidence or documentation that the certifying officer deems necessary.

(e) **Paragraph IV 5 - retail sale container**

This paragraph can be certified on sight of the finished

product for export and/or any other evidence that the certifying officer deems necessary.

(e) **Paragraph IV 6 - Bacteriological testing**

For the purposes of this paragraph, "satisfactory" means compliance with the following standards:

Salmonellae: absence in 25g, n=5, c=0, m=0, M=0  
Enterobacteriaceae: n=5, c=2, m=10, M=300 in 1g;

where:

**n** = number of units comprising the sample;

**m** = threshold value for the number of bacteria; the result is satisfactory if the number of bacteria in all the sample units does not exceed **m**;

**M** = maximum value for the number of bacteria; the result is considered unsatisfactory if the number of bacteria in one or more sample units is **M** or more;

**c** = number of sample units the bacterial count of which may be between **m** and **M**, the sample still being considered acceptable if the bacterial count of the other sample units is **m** or less.

This paragraph may be certified on the basis that the UK pet food manufacturing establishment is approved in accordance with the **Animal By-Products (Enforcement) (England) Regulations 2013** (as amended) or with parallel legislation in force in Scotland, Wales and Northern Ireland.

Alternatively, this may be certified by reference to laboratory test results from an ISO 17025 accredited laboratory confirming that the pet food for export complies with the abovementioned microbiological standards.

(f) **Paragraph IV 7 - Registration of manufacturing facility**

This paragraph requires the pet food manufacturing establishment to be "registered (permitted) in accordance with United Kingdom regulations and is inspected and overseen by the government of the United Kingdom".

Therefore, depending on the nature of the animal-derived ingredients used, this paragraph may be certified on the basis that the pet food manufacturing establishment is either:

- (i) approved in accordance with the **Animal By-Products (Enforcement) (England) Regulations 2013** (as amended) or with parallel legislation in force in Scotland, Wales and Northern Ireland.

Or

- (ii) approved in accordance with the **Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015** (as amended) or with parallel legislation in force in Scotland, Wales and Northern Ireland.

(g) **Paragraph IV 8 - treatment options for pet food containing poultry**

If the product does NOT contain poultry, *section 9 should be struck through in the usual manner.*

If the product contains poultry meat or derivatives, one of the listed heat treatments must be applied. The corresponding box should be ticked.

(h) **Paragraph IV 9 - treatment options for pet food containing egg or egg products**

If the product does NOT contain egg or egg products, *section 10 should be struck through in the usual manner.*

If the product contains egg or egg products, it must be treated in accordance with Korea's requirements for the relevant egg and egg products. The relevant clause must be certified, and all other clauses struck through.

For raw egg material that does not correspond to the options listed, the treatment temperature and time should be inserted. The exporter should confirm that this method is acceptable to the Korean import authorities.

(i) **Paragraph IV 10 - treatment options for pet food containing milk and/or dairy**

If the product does NOT contain milk ingredients, *section 11 should be struck through in the usual manner.*

If the product contains milk, it must meet the conditions in IV 11.

7. 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.

8. **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](mailto:vs.implementation@daera-ni.gov.uk)