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NOTES FOR THE GUIDANCE OF THE OFFICIAL VETERINARIAN AND EXPORTER

In relation to 8625EHC titled:
VETERINARY HEALTH CERTIFICATE FOR PROCESSED ANIMAL PROTEINS AND RENDERED FAT OF PORCINE ORIGIN INTENDED FOR EXPORT TO SOUTH AFRICA FROM UNITED KINGDOM FOR USE IN PETFOOD OR IN AQUATIC FEED

Associated Documents: 8625EHC

IMPORTANT
These notes provide guidance to Official Veterinarians (OV) and exporters. The NFG should not be read as a standalone document but always in conjunction with certificate 8625EHC.**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

This certificate may be used for the export of **processed animal proteins** (**PAP**) or **rendered fats** derived from **Category 3 porcine material of UK origin** and intended for feeding to pets and aquatic animals.

In accordance with **paragraph IV 1** and **paragraph IV 3** of the certificate, the PAP and rendered fats must have been made in a UK rendering establishment from materials obtained from animals slaughtered in the UK.

This certificate may also potentially be used for the export of **compound feeds for feeding to pets and aquatic animals, and which contain PAP derived from Category 3 porcine material,** but exporters must verify that such consignments will be accepted by the importing authority.

For the purposes of this certificate the following definitions laid down in **Regulation (EC) 142/2011** (as amended), shall apply:

> "**'processed animal protein'** means animal protein derived entirely from **Category 3 material**, which have been treated in accordance with Section 1 of Chapter II of Annex X (including blood meal and fishmeal) so as to render them suitable for direct use as feed material or for any other use in feedingstuffs, including petfood, or for use in organic fertilisers or soil improvers;
>
> however, it does not include blood products, milk, milk-based products, milk-derived products, colostrum, colostrum products, centrifuge or separator sludge, gelatine, hydrolysed proteins and dicalcium phosphate, eggs and egg-products, including eggshells, tricalcium phosphate and collagen;".
>
> "**'rendered fats'** means either fats derived from the processing of:
> (a) animal by-products; or
> (b) products for human consumption, which an operator has destined for purposes other than human consumption;"

Similarly, the definition of **Category 3 material** under Article 10 of **Regulation (EC) 1069/2009** (as amended) shall also apply.

The principles and controls laid down under **Regulation (EC) 1069/2009** (as amended) and **Regulation (EC) 142/2011** (as amended) continue to be enforced and implemented by the Animal By-Products (Enforcement) (England) Regulations 2013 (as amended) and equivalent legislation in force in Scotland, Wales and Northern Ireland.

Exporters and certifying Official Veterinarians are therefore reminded that:

- the **export of Category 1 material, Category 2 material** (and any product derived from those materials) from the UK to any countries outside the EU **is prohibited** unless specific export rules have been laid down for the commodity concerned.

  Hence only fats derived from Category 3 material may be exported at this time.

  [Articles 8, 9 and 43(3) of **Regulation (EC) 1069/2009** (as amended) refer]

- **intra-species recycling**, that is, the feeding of animals or fish with PAP derived from the same species, **is prohibited.**

  [Article 11 of **Regulation (EC) 1069/2009** (as amended) refers]

2. CONTROLS ON THE *EXPORT* OF PAP

The export of PAP from the UK to countries outside the EU is controlled by the Transmissible Spongiform Encephalopathies (England) Regulations 2018 (as amended) and equivalent legislation in force in Scotland, Wales and Northern Ireland.

These statutory instruments continue to enforce and implement the principles and controls laid down under **Regulation (EC) 999/2001** (as amended).

PAP derived from non-ruminant terrestrial animals and compound feed containing it may only be exported subject to the **export controls** laid down under **Regulation (EC) 999/2001**, as summarised below:

Either

- the **standard conditions** set out under **Point 3** of Section E of Chapter V of Annex IV to **Regulation (EC) 999/2001** (as amended) are fully complied with.

  See **paragraph A** below.

Or

- the **derogation** provided for under **Point 4(e)** of Section E of Chapter V of Annex IV to **Regulation (EC) 999/2001** is fully complied with.

  See **paragraph B** below.

Note: Compliance with the above **export controls** is required regardless of the requirements of this certificate and independently of any other requirements the authorities in the importing country may have.

OV's and exporters are advised to familiarise themselves with the detailed export controls referred to above, but for convenience the key requirements are outlined below:

A **Standard Conditions for the export of non-ruminant PAP**

Point 3 of Section E of Chapter V of Annex IV to Regulation (EC) 999/2001 (as amended) relates to the complete segregation of ruminant and non-ruminant materials at each stage in the production of the PAP and of compound feeds containing the PAP, supported by regular sampling and analysis to verify the absence of cross-contamination.

As a result, these conditions focus on robust segregation at **slaughterhouses**, **cutting plants**, **rendering establishments** and **compound feed establishments**.

The requirements for each of these establishments are outlined below:

(a) slaughterhouses must:

Either:

(i) be specifically registered by the competent authority as slaughterhouses which do not slaughter ruminant animals;

Or

(ii) be specifically inspected and authorised by the competent authority to also slaughter ruminant animals on the basis that robust and effective measures are in place to prevent cross-contamination between ruminant and non-ruminant by-products, including:

- the use of physically separate lines;
- separate collection, storage, transport and packaging facilities;
- regular sampling and laboratory analysis of non-ruminant animal by-products for the presence of ruminant proteins using a method set out under Regulation (EC) 152/2009.

(b) cutting plants must:

Either

(i) be specifically registered by the competent authority as cutting plants which do not debone or cut up ruminant meat;

Or

(ii) be specifically inspected and authorised by the competent authority to also debone or cut up ruminant meat on the basis that robust and effective measures are in place to prevent cross-contamination between ruminant and non-ruminant by-products, including:

- the use of physically separate lines;

- separate collection, storage, transport and packaging facilities;

- regular sampling and laboratory analysis of non-ruminant animal by-products for the presence of ruminant proteins using a method set out under Regulation (EC) 152/2009.

(c) other establishments must:

Either

(i) be specifically registered by the competent authority as not handling ruminant products;

Or

(ii) be specifically inspected and authorised by the competent authority to also handle ruminant products on the basis that robust and effective measures are in place to prevent cross-contamination between ruminant and non-ruminant by-products, including:

- the use of physically separate lines;
- separate collection, storage, transport and packaging facilities;
- regular sampling and laboratory analysis of non-ruminant animal by-products for the presence of ruminant proteins using a method set out under Regulation (EC) 152/2009.

(d) the **rendering** plant must:

Either

(i) be specifically registered by the competent authority as being dedicated to processing non-ruminant animal by-products and must source their raw materials exclusively from **slaughterhouses**, **cutting plants** and **other establishments** referred to in the abovementioned **paragraphs a.**, **b.** and **c.** respectively;

Or

(ii) be specifically inspected and authorised by the competent authority to also process ruminant animal by-products on site on the basis that robust and effective measures are in place to prevent cross-contamination between PAP of ruminant origin and PAP of non-ruminant origin, including:

- producing PAP of ruminant origin within a closed system that is physically separate from that used for the production of PAP of non-ruminant origin;
- storage and transport of animal by-products of ruminant origin in facilities that are physically separate from those used for animal by-products of non-ruminant origin;
- storage and packaging of PAP of ruminant origin in facilities that are physically separate from those used for finished products of non-ruminant origin;
- regular sampling and laboratory analysis of the PAP of non-ruminant origin using a method set out under Regulation (EC) 152/2009 to verify the absence of PAP of ruminant origin.

(e) the **compound feed** establishment must:

Either

(i) be authorised by the competent authority and be dedicated to the production of feed for aquaculture animals;

Or

(ii) be specifically inspected and authorised by the competent authority to also produce feed intended for other farmed animals (other than fur animals) on the basis that robust and effective measures are in place to prevent cross-contamination between the feed for aquaculture animals and the feed for other farmed animals, including:

- the manufacture, storage, transport, packaging and handling of compound feed intended for ruminant animals must be carried out in facilities that are physically separate from those used for compound feed intended for non-ruminant animals;
- the manufacture, storage, transport, packaging and handling of compound feed intended for aquaculture animals must be carried out in facilities that are physically separate from those used for compound feed intended for other non-ruminant animals;
- the keeping of records detailing the purchases and uses of PAP derived from non-ruminant terrestrial animals (other than farmed insects) and the sales of compound feed containing this PAP and making these available to the competent authority for a period of at least five years;

- regular sampling and laboratory analysis of the compound feed intended for farmed animals other than aquaculture animals using a method set out under Regulation (EC) 152/2009 to verify the absence of unauthorised constituents of animal origin.

Or

(iii) be a **home compounder** that:

- is registered by the competent authority as a producer of complete feed from compound feed containing PAP derived from non-ruminant terrestrial animals (other than farmed insects);
- only keeps aquaculture animals;
- only uses compound feed containing PAP derived from non-ruminant terrestrial animals (other than farmed insects) which contains less than 50% crude protein in the manufacture its complete feed;

B **Derogation from the Standard Specific Conditions for the export of non-ruminant PAP**

Point 4(e) of Section E of Chapter V of Annex IV to Regulation (EC) 999/2001 (as amended) allows rendering establishments to make use of a derogation from the requirements set out under **paragraph A(d)** above on the basis that **each consignment** satisfies the following requirements:

(a) the consignment is destined for the manufacture of **pet food** in the country of destination;

And

(b) the consignment has been **analysed in accordance with the polymerase chain reaction (PCR) method** set out under point 2.2 of Annex VI to Regulation (EC) No 152/2009 to verify the absence of constituents of ruminant origin.

The certifying OV is advised to keep records of the evidence used to determine compliance with the requirements of either **paragraph A** or **paragraph B** above.

If the OV has any concerns that the consignment or the establishments involved in its manufacture do not comply with either of the requirements summarised at **paragraph A** or **paragraph B** above, then the certificate should not be signed and the Animal and Plant Health Agency (APHA) Specialist Service Centre for International Trade, in Carlisle, or DAERA should be consulted for advice.

2. Certification by an Official Veterinarian (OV)

This certificate may be signed by an Official Veterinarian authorised on behalf of 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 holds the appropriate Official Controls Qualification (Veterinary) (OCQ(V)) authorisation, or 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**.

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

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

4. COMPLETION OF PART I – DETAILS OF DISPATCHED CONSIGNMENT

Box 1. – Veterinary Import Permit number

The number of the import permit issued by, for example, South Africa's Department of Agriculture, Land Reform and Rural Development, must be entered in the space provided.

Box 2. – Approval Number

This relates to the **rendering establishment** responsible for processing Category 3 animal by-products to produce the PAP and/or rendered fat present in the consignment.

The rendering establishment 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).

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. Note that if the rendering establishment consists of a number of separately approved production lines, the approval number entered must relate to the relevant production line.

In addition, the **rendering establishment** must also satisfy the conditions described under either **paragraph 1A(d)(i)** or **paragraph 1A(d)(ii)** above, unless if the rendering establishment is to make use of the derogation outlined in **paragraph 1B** above.

Box 3. – Certificate Number
A unique number will be pre-printed as part of the certificate issuing process.

Box 4. – Responsible Ministry
This should be completed with "**Defra**".

Box 5 – Certifying Department
This should be completed with either "**APHA**" or "**DAERA**" depending on whether the certificate was issued in Great Britain or Northern Ireland.

Box 8. – Country of Origin
ISO 3166 is the commonly accepted International Standard for country codes.

This should be completed with "**United Kingdom**" and "**GB**" because the consignment must have been made using meat of United Kingdom origin processed in a rendering establishment located in the United Kingdom.

Box 13. – Declared point of entry
The exporter must advise the OV of the point of entry into the destination country and this must be entered in the space provided.

Box 14. – Conditions for transport/storage
This must be completed to indicate whether the transport/storage temperature is ambient, chilled or frozen. For chilled or frozen products, the target temperature should also be included.

Box 15. – Identification of container(s)/Seal Number
The relevant container or seal number may be entered here.

Box 16. – Identification of the Consignment
A brief veterinary description of the goods should be entered in preference to commercial branding or trade names.

If there is insufficient space, OVs should use a separate schedule to identify the full consignment. The schedule must, as a minimum, contain the same information as that required under **box 16** of the certificate, and **box 16** must be annotated "See Attached Schedule".

Each page of the schedule must bear a page number and the health certificate reference number from **box 3** and be signed, dated and stamped by the Official Veterinarian.

The schedule must be stapled inside the health certificate and the Official Veterinarian should "fan" and stamp over the pages of the schedule and certificate. The top stapled corner of the schedule and certificate should be folded over and stamped also.

Any blank spaces in the schedule or in **box 16** should be deleted with diagonal lines.

5. **PART II – CERTIFICATION**

The health information may be certified on the basis of the following specific guidance in conjunction with the RCVS Principles of Certification. OVs should develop due familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the establishment. This should be supported as necessary by physical inspection and by examination of relevant documentation or other records including commercial documentation, veterinary statements, laboratory analysis and valid declarations.

II.1 – Healthy animals born, reared and slaughtered in the UK

This may be certified on the basis that the raw animal materials were Category 3 materials obtained from approved UK slaughterhouses slaughtering animals for human consumption. This may be supported as necessary by examination of relevant documentation and production records.

II.2 – Notifiable Disease Freedom

This may be certified on behalf of the Department provided written authority to do so has been obtained from the APHA Specialist Service Centre for International Trade, in Carlisle or DARD on form **618NDC.**

If the UK has not been free from foot and mouth disease for the past 12 months, the manufacturer will need provide the Official Veterinarian with evidence of where in the UK the raw materials originated to enable form **618NDC** to be issued.

II.3 – Plant approval and supervision

This paragraph may be certified on the basis that the **rendering 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, as described above in relation to **Box 2** of the certificate.

II.4 – Suitable for feeding pet animals and aquatic animals

This paragraph may be certified on the basis that the final products were produced in an approved rendering establishment using Category 3 material and that the product can be placed on the UK market for the manufacture of products intended for consumption by pet animals and aquatic animals.

II.5 – Processing parameters

This paragraph should be completed to most accurately reflect how the raw animal material was processed during the manufacture of the final product.

One of the three options, (a), (b) and (c) must be certified. In the case of paragraph (b), only one of the subparagraphs should be certified.

All of the options which are not to be certified must be struck through in their entirety in the usual manner.

II.6. – Microbiological standards

This requires the product, as exported, to be tested for the presence of Salmonella and Enterobacteriaceae in line with the same microbiological standards laid down under Annex X, Chapter I, of Regulation (EU) No 142/2011 (as amended).

However, note that **this paragraph still requires rendered fats to comply with these microbiological standards**, even if those rendered fats were obtained from the processing of animal by-products resulting in processed animal protein satisfying these microbiological standards.

II.7. and II.8 – Exclusion of ruminant or lagomorph origin material

The certifying Official Veterinarian should make due enquiry to verify that the product is not made using any material of ruminant or lagomorph origin, and that the product is made on an approved production line that does not process any material of ruminant or lagomorph origin.

Exporters should be aware that importing authorities are likely to test consignments for the presence of ruminant and lagomorph material. Therefore, **exporters must be confident that their consignment would be capable of passing these very sensitive tests.**

6. SUPPORTING DECLARATIONS

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 and/or declared intended use. 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.

7. DISCLAIMER

This certificate and these notes are 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) – Carlisle, via the link below:

https://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening#customer-service-centres-csc

In Northern Ireland, please contact the DAERA trade administration team:

- e-mail - tradeadminpost@daera-ni.gov.uk
- Phone – 02877442146