



Department
for Environment
Food & Rural Affairs

Frequently Asked Questions

Revised GEFS guidance

Membership

If a company is not a member of GEFS as a manufacturer, can they issue Support Attestations to a customer who is a member?

Yes. Membership is restricted to exporters only. Exporters may allow their manufacturers to use Support Attestations to facilitate the export of those goods.

How long would a member have to not use GEFS before their membership lapses?

If the member does not apply for any EHCs using the GEFS for five months, they will be contacted via email to confirm whether their membership is still required. If the member confirms their intention to make imminent use of the scheme (i.e., within the following two months), they will retain their membership. However, if they still do not use the GEFS during that time, their membership will be deemed to lapse and they will be removed from the scheme.

Scope

EHC 8351 does not appear in Annex III. Is this a deliberate omission?

EHC 8351 may be used for exports using GEFS and will be included when the guidance is updated. This EHC can be used for the transit of products through the EU where the final destination is an overseas British territory that does not require additional certification.

Can the GEFS be used for EHCs for goods destined for Northern Cyprus, transiting through the EU?

The GEFS is designed to facilitate to export of goods intended for EU BCPs, but not the rest of world. We have therefore clarified the use of the GEFS for transits in the guidance: it can be used only for goods transiting the EU before entering an overseas British territory. As North Cyprus is not considered the EU for import/export purposes, unfortunately GEFS would not be suitable for these exports and the normal processes for export and certification will apply.

Suppliers and supply chains

What is a “stable supply chain”?

For the purposes of GEFS, a stable supply chain means that there have been no relevant changes (with the exception of changes made specifically to meet new EU requirements) within the preceding 30 calendar days and in at least four of the preceding six months to the first compliance visit. A “relevant change” is a change that impacts information to be certified in the export health certificate, which includes the addition of a new supplier or a change to the processing/heat treatment of a product.

Point 102 of the GEFS guidance states the exporter must ensure the list of manufactures as held by the APHA is always up to date and must contact APHA whenever manufactures need to be updated or removed. Can you clarify what that means?

When a new member joins the GEFS, they submit a list of all manufacturers who will be using Support Attestations to provide goods to the exporter. Point 102 requires the member (i.e., the exporter) to keep this list up to date, by contacting the APHA GEFS team whenever they intend to begin accepting Support Attestations from a new manufacturer or when a manufacturer is removed. This ensures records of all manufacturers making use of the scheme is correct at all times for monitoring purposes.

What happens if the manufacturer is forced to use a new supplier? Can they no longer use GEFS?

Stability is the key principle of the GEFS. That said, we acknowledge that there may be reasons why a change of supplier is unavoidable, and so we have committed to exploring other ways in which assurances could be made to the OV or FCCO issuing the Support Attestation. Further guidance will be provided once agreed.

Can the GEFS be used if a member wants to manufacture a completely new product using ingredients from a new supplier of raw ingredients?

A stable supply chain is the basis for use of the GEFS. In the case of a new product using ingredients from a new supplier of raw ingredients, the supply chain cannot yet be deemed “stable” for the purposes of the scheme. We have however committed to exploring other ways in which assurances for new products and suppliers could be made to the OV or FCCO issuing the Support Attestation and further guidance will be provided once agreed.

Support Attestations

Can you clarify of the definition of “production” with regards to frozen goods that have been produced and stored for long time periods before they are transported for export?

For the purposes of GEFS, the product is “produced” when it is fully prepared and packaged for sale to the final consumer. The "production date" for frozen products is therefore still the date on which the product is produced and packaged, even if it is then placed into long-term storage.

For manufacturers with multiple sites but the same production methods, does a compliance visit need to take place at each site?

There are certain conditions set out in point 35 of the GEFS guidance in relation to multiple production sites. The OV or FCCO is required to inspect evidence relating to each site, which may be done remotely. However, they must still complete an in-person compliance visit to each site at least every three months.

When members are audited by APHA, how can OVs or FCCOs prove that they have carried out compliance visits with manufacturers?

During a member audit, the exporter will be asked to provide evidence of the compliance visit that took place prior to issuing a Support Attestation. This can be pictures of the visitor logbook, emails, a meeting invite, photograph, online calendar appointments, etc. OVs and FCCOs should discuss what might be appropriate with the manufacturer.

Why does the “Relevant establishments” table in Part 1.B.3. not specify which goods each raw ingredient is used in?

Part 1.B.3 outlines all the suppliers and raw materials that may be used in any of the final products. The specific materials used in each batch is then included within the batch-specific information known as the Batch Declaration. This is designed to provide more flexibility in moving between suppliers for each product, as opposed to limiting which supplier can be used for which product at the time of issuing the Support Attestation.

In the “Relevant establishments” table in Part 1.B.3. of SA1, why is “farm” listed as an example establishment?

The table in Part 1.B.3. is used to list all establishments that may need to be listed on the final export health certificate when issued. In this case, the farm may need to be listed on EHC 8350 if it is processing eggs. However, the list only provides examples and is not exhaustive. Manufacturers should discuss what establishments should be recorded with the OV or FCCO issuing the Support Attestation and the Certifying Officer.

Can a manufacturer use one Support Attestation to include multiple POAO goods that require different EHCs?

Yes. The goods to be covered should be specified in Part 1.B.4. and the relevant attestations verified in Part 1.C.

What does the unit weight in the “Description of products” table in Part 1.B.4. refer to?

This weight is provided to make it easier for the Certifying Officer to identify the correct products covered by the Support Attestation, for example, in the case of the same product being issued in packs of different size. It should therefore list the size of product as listed on its packaging.

Why does the Support Attestation not include “expected batch codes”?

The Support Attestation can only be used to attest to information that can be verified at the time of the compliance visit. As these are only expected batch codes and do not exist at the time of issuing the Support Attestation, they are not to be included.

What should a manufacturer do if they need more lines than provided in the tables in Part 1.B.?

Additional pages (referred to as schedules on the template) may be added to the Support Attestation to continue the tables where required, though they must be clearly titled and include, as a minimum, the headings included in the Part 1.B. tables.

Where are the new Support Attestations and GEFS guidance?

Information about GEFS, GEFS guidance and Support Attestations can be found on GOV.UK at: [Export groups of products using the Groupage Export Facilitation Scheme \(GEFS\) - GOV.UK](#)

Can you update the Support Attestation PDFs so that it is possible to strike through text?

Yes, we have amended the Support Attestation PDFs so they can be edited to strike through text. Note however that edit functionality should not be used to add to, remove or alter the standardised text. Evidence of editing the standardised text will be deemed a major non-compliance with the scheme’s conditions and may result in removal from the GEFS.

If the guidance applies from 1 August, what happens to existing Support Attestations issued before then with expiry dates that occur after 1 August?

The new template should be used for any new compliance visits conducted from 1 August, but it won’t make any previously signed Support Attestation null and void. A Support Attestation issued prior to 1 August will be accepted in the old format until it expires, at which time the new SA template should then be used.

What happens if a manufacturer/exporter's IT system cannot be updated by 1 August to reflect the updated Support Attestation?

The new guidance will be enforced from 1 August 2025. We do appreciate however that there will be additional challenges for businesses with bespoke IT systems who need to integrate the new template, in which case Defra welcomes a discussion on how to proceed on that specific change in the guidance. However, even if Defra agrees to a delay on the use of the new Support Attestation with a manufacturer/exporter, all other changes in the revised guidance will still apply from 1 August.

Can a manufacturer switch to the new Support Attestation before 1 August?

Yes.

Batch Declarations

Is the Batch Declaration a new requirement?

No, the GEFS has always required the use of a commercial document to confirm batch-specific information to the Certifying Officer and to provide guarantees that the attestations verified by the OV or FCCO who issued the Support Attestation still apply. The only change in the new guidance is that this document has been titled "Batch Declaration".

Is there a template of Batch Declaration available?

No, the guidance does not prescribe what form this needs to take but lists the sort of information and guarantee paragraph that should be included. If a suggested optional template would be welcomed, we will look to provide one in due course.

Does the Batch Declaration have to be issued once for each load?

One Batch Declaration should be issued for each batch produced, intended for export, even if that batch is transported using multiple loads. The Certifying Officer signing the certificate for export must have access to the information in the Batch Declaration relevant to the goods they are certifying.

How should a Batch Declaration be prepared when the batches for export are not known at the time of production? For example, where goods will be moved to a third location (e.g., storage depot) first.

Manufacturers must issue Batch Declarations at an appropriate point in their own processes so that, when goods are selected for export, the required information can be entered on the declaration. This is typically done at the point a batch is produced, as the information on the ingredients and manufacturer processes will be readily available and can be signed off by an authorised person with relevant, timely knowledge. If, however, record-keeping systems are in place that mean this

information is already being recorded contemporaneously, the Batch Declaration could be issued once the goods are selected for export at the storage depot.

Does the Batch Declaration need to be signed by an OV or FCCO?

No, only the Support Attestation must be signed by an OV or FCCO. The Batch Declaration is signed by an individual who has both sufficient knowledge of and responsibility for the relevant parts of the production, transport and storage processes and who has been authorised in writing by the Managing Director (or equivalent) of the manufacturer.