

Export of animal by-products for the manufacture of pet food intended for dispatch to or for transit through the European Union or Northern Ireland

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No: 8311 NFG

For export of animal by-products for the manufacture of pet food intended for dispatch to or for transit through the European Union or Northern Ireland.

NOTES FOR GUIDANCE (NFG) FOR THE CERTIFYING OV, CERTIFICATION SUPPORT OFFICER AND EXPORTER

1. APPLICABLE LEGISLATION:

[Council Regulation \(EC\) No 1069/2009](#) and [Commission \(EU\) Regulation 142/2011](#) (as amended)

Any other EU legislation referenced in the certificate must be complied with and can be accessed on the following link:

<https://eur-lex.europa.eu/homepage.html>

IMPORTANT

These notes provide guidance to Certifying Officers (CO) and exporters. The NFG should have been issued to you together with the relevant export certificate applicable for exports of animal by-products for the manufacturing of pet food intended for dispatch to or transit through the EU or Northern Ireland. The NFG should not be read as a standalone document but in conjunction with the veterinary 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 GB, in advance of each consignment.

[Please note, policies are being reviewed. NFG will be further amended to provide specific guidance. Traders should look at NFGs regularly for any updates]

2. SCOPE OF THE CERTIFICATE

This Model 8311 veterinary certificate may be used for the export of animal by-products (ABP) for the manufacturing of pet food intended for dispatch to or transit through the EU or Northern Ireland, in accordance with the relevant requirements described in Regulation (EU) No 142/2011.

ABPs for the manufacture of pet food may consist of ABPs which:

- a) contain Category 3 material, other than material referred to in Article 10(n), (o) and (p) of Regulation (EC) No 1069/2009; and

- b) may contain imported Category 1 material comprising of animal by-products derived from animals which have been submitted to illegal treatment as defined in Article 1(2)(d) of Directive 96/22/EC or Article 2(b) of Directive 96/23/EC.

Note: The use of those substances referred to above defined as “illegal treatment” is not permitted in GB. Any ABP derived from animals which have been so treated must relate to imported ABP materials.

A pet animal is defined in Article 3.8 of Regulation (EC) No 1069/2009 as being any animal belonging to species normally nourished and kept but not consumed, by humans for purposes other than farming.

This certificate may also be used where the intended use of the raw animal by-product by the premises of destination in the EU member state is not known by the exporter at time of export.

An example is where raw animal by-product from the GB is exported to an EU member state where it will be processed at the premises of final destination in the EU member state but the final use of this product will not be known until after it has been processed and resold.

3. CERTIFICATION BY AN OV

In **England, Scotland and Wales**, this certificate must be signed by a Government Veterinary Officer or by an OV appointed by the Animal and Plant Health Agency (APHA) on behalf of Ministers in Defra, the Scottish Government or the Welsh Government and who hold the appropriate Official Controls Qualification (Veterinary) (OCQ (V)) authorisation.

OVs must sign and stamp, with the OV stamp, the health certificate in ink of a different colour to that of the printing of the EHC. There is no requirement to sign and stamp in a specific colour.

The OV should keep a copy of the signed certificate and any supporting documents for at least three years after signature or receipt/dispatch of the consignment, whichever is later. These can be electronic copies.

EHC in foreign language/s of the EU MSs.

EHC should be in English and the foreign language/s of the Border Control Post (BCP) of entry in the EU, as well as in the language of the EU MS of destination if this a different country from the point of entry to the EU. The required EHC must accompany the consignment.

Listing of the EU MS BCPs can be found here:

https://ec.europa.eu/food/animals/vet-border-control/bip-contacts_en

The foreign language certificate as received from the APHA Centre for International Trade at Carlisle or via the Export Health Certificates on-line system (EHCO) and bearing the same

unique reference number as the English certificate, should be considered an official and accurate translations of the English, as published in EU legislation.

The (sub-) paragraphs / options and how they are numbered and formatted is identical in the English and foreign language editions and to the legislation published by the EU Commission. Therefore, when the same phrases/sentences in the foreign language versions/s as in the English version are struck through, both versions can and must be signed (as opposed to being initialled) by the OV as a genuine and properly authorised translation of the English.

This also applies to any instructions in the guidance notes to strike out certain paragraphs or to certify statements that the country is free of certain notifiable diseases etc.

Signing, stamping and pagination

The foreign language version/s and any schedules (if any) may be stapled to the English version but doing so and then fan stamping the multiple sheets is not enough to create one indivisible single document according to the EU Commission.

Therefore, each page (including schedules) should be individually signed and stamped and bear the reference number of the certificate. The pages comprising the complete document should be sequentially numbered so they are part of a finite sequence which covers the English, foreign language version/s and any schedule pages.

For example, if the certificate consists of four A4 pages printed back to back on two sheets of A4 paper with a schedule that is three A4 pages long, all 11 pages must be stamped and **signed** (as above) and numbered 1/11 to 11/11.

COs will have to make handwritten corrections to page numbering as may be required. E.g. 1/4 to 4/4 (if present) on the foreign language parts in the example given above will need to be crossed out and the 1/11 to 11/11 entered.

The EHC accompanying the consignment will then comprise the original English EHC and any required additional foreign language/s. These should be arranged in order with the English version on the top, followed by the foreign language/s version/s, and finally the page(s) of the schedule (if any) at the bottom.

As per general guidance for certifiers on APHA's Official Veterinarian Training, any handwritten corrections or permitted deletions to a certificate should be stamped and **initialled**. This includes the deletion of optional statements in Part II of the certificate and alterations to content in Part I. The same applies if a pre-populated text in a box in Part I of the EHC needs to be amended. (E.g. if Box I.7 which is pre-populated as 'United Kingdom' 'GB', needs to be amended for triangular trade where third country origin 'Products Of Animal Origin' are being certified in the original third country packaging with the original third country Identification Marks, in which case the country of origin will be the third country in question and not the United Kingdom). Please follow the guidance on corrections in the link below:

http://apha.defra.gov.uk/External_OV_Instructions/Export_Instructions/Certification_Procedures/index.htm

We advise that individual stamping and initialling of diagonal lines drawn through blank boxes in Part I is not necessary. This is to reduce excessive stamping on the certificate. However, we are aware that some BCPs advise otherwise and request stamping and initialling of manually crossed out blank boxes in Part I of the certificate. In such cases OV should conform to the BCPs request to facilitate the clearance of the goods.

You can find further information on Export Health Certificates (EHC) Online Guidance for Certifiers in the link below:

<http://apha.defra.gov.uk/documents/exports/guidance-ehc-certifiers.pdf>

UK approved establishments will be uploaded to [Europa](#) website in due course, until the establishments are in Europa website you can find the list of UK approved establishments in the link below:

<https://www.gov.uk/government/publications/businesses-approved-to-export-to-the-eu>

Please check the guidance on completion of Part I of the EHC at the bottom of the EHC and in the links provided in the NFG. For completion of Box I.8 - Region of Origin Code, if applicable; the territory code should be as listed in the relevant legislation that is provided under the notes at the bottom of the EHC. This is only for species or products affected by regionalisation measures or by the setting up of approved zones in accordance with a European Community Decision. The approved regions or zones must be indicated as described in the Official Journal of the European Union.

PART I: DETAILS OF THE CONSIGNMENT

The certificate requires the consignment to be transported in containers which have been officially sealed.

Please complete all the boxes in Part I of the certificate.

The Harmonised System (HS) Code is a commodity classification system used as a basis for customs tariffs and for international trade statistics.

It is the exporter's responsibility to ensure that the HS code is entered correctly and accurately reflects the product(s) being consigned.

Please complete all the boxes in Part I of the certificate in accordance with the guidance lay down on Commission Decision 2007/240/EC that can be accessed via this link:

<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32007D0240>

Further information on HS Codes can be found online at:

<https://www.gov.uk/trade-tariff/sections> and <http://madb.europa.eu/madb/euTariffs.htm>

PART II: CERTIFICATION

Animal Health Attestation

The OV signing the export health certificate must have read and understood Regulations (EC) No 1069/2009, in particular Articles 8 and 10, and Commission Regulation (EU) No 142/2011, in particular Chapter II of Annex XIV and must ensure that the products meet the requirements of the certificate.

The following specific guidance in conjunction with the RCVS Principles of Certification may be followed: **The OV must have familiarity with sourcing, procurement, segregation, processing, and handling and storage arrangements in place at the establishment and ensure that the consignment meets the conditions required in the certificate. Where the OV is required to certify conditions outside of their personal knowledge, they must request and be provided with appropriate supporting documentation from another veterinarian (if appropriate) and/or the exporter.**

II.1 Plant approval and consequent supervision may be established as per the procedure detailed at Section 7 - GB APPROVED ESTABLISHMENTS TO EXPORT TO THE EU. The OV should ask to see a copy of the approval document.

II.1.2 The OV must establish that the ABP has been produced in a region of the UK and enter the appropriate code: GB- United Kingdom of Great Britain and Northern Ireland, GG- Guernsey, IM- Isle of man, or JE- Jersey.

One of the conditions must be met:

- *Either- Animals must have either lived in the GB since birth or have at least a 3-month GB residency;
- *or- were killed wild in the GB;
- *or - are derived from the species listed at the statement.

(Note if the second “or” option applies and imported ABP material is used the OV should refer to Section 6 - CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE) for guidance.)

The OVs should develop due familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the establishment. This should be supported by physical inspection and by examination of relevant documentation, or other records, including commercial documentation, veterinary statements, and valid declarations.

II.1.3

- **The “either” option relates to *terrestrial farmed animals. ABP have been obtained or produced from animals which were not slaughtered or killed to eradicate any epizootic disease and;***

II.1.3. (a) (i) and (ii) can be certified on the basis of GB freedom from the specific diseases for the specific time periods. (See Section 4 Notifiable Disease Clearance).

II.1.3.b There are two options.

* “either”- This attestation can be deleted if the ABP are derived from animals of GB origin, at the time of writing this NFG GB is listed to export fresh meat of ungulates to the EU.

If this option needs to be certified as the requirements in the second option below cannot be met, the OV can certify this statement if the animals from which the ABPs were derived have remained on their holding of origin for 40 days prior to moving directly to slaughter. The conditions can be certified through knowledge of sourcing and procurement arrangements in place at the plant as supported by relevant documentation and exporter declaration.

In the case of broiler poultry where animals are slaughtered before 40 days of age then the statement can be signed as long as the birds have remained on the holding of hatching or holding on which the day old chicks are placed.

* “or”- This attestation can be certified if the ABP are derived from animals of GB origin, as GB is listed to export fresh meat of ungulates to the EU, and if the animals have remained on holdings under veterinary supervision. The animals from which the ABP derived must have passed ante-mortem health inspection during the period of 24 hours preceding the time of slaughter and have shown no evidence of the diseases listed in point II.1.3.a.i or ii.

- **The “OR” option relates to ABPs derived from animals captured and killed in the wild only and should be deleted if not applicable. Where applicable:**

II.1.3 (a)(i) & (ii) can be certified based on UK freedom from the specific diseases and time periods. (See Paragraph 4 Notifiable Disease Clearance).

II.1.3 (b) Relevant written declarations should be sought from the exporter, collection centre operator and game handling establishment operator attesting to the requirement. Due familiarity with the sourcing arrangements is necessary.

II.1.4 Establishment disease radius freedom

This can be certified through procedure detailed at Section 4 (Notifiable Disease Clearance)

II.1.5 & II.1.6 The OV must develop due familiarity with sourcing, segregation, handling, packaging, labelling and storage arrangements at the establishment. There is a requirement for the transport containers to be officially sealed. This must be supported by physical inspection and a written declaration from the plant operator.

II.1.7 Starting/source material

The starting material must either be Category 3 material and/or limited imported Category 1 material as detailed in the Scope Section 2.

Select the correct categories. Familiarity with the sourcing arrangement of the raw material by the establishment is necessary as supported by physical inspection and by examination of relevant documentation or other records including commercial documents, veterinary statements and valid written exporter declarations to ensure the correct sub-category or sub-categories is/are selected.

The limited Category 1 material derived from animals which have been submitted to certain illegal treatments (the last option on the list) will only apply to such ABP imported into GB. **(The use of these illegal treatments is not permitted in GB).**

If imported ABP material is used the OV should refer to Section 6 - CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE) for guidance.

The correct options in relation to specific starting materials of ABP must be selected, and the other options deleted.

II.1.8 Preservation method

This may be certified on the basis of due familiarity with procedures in place in relation to the freezing or preservation of the ABP and should be supported by physical inspection and relevant documentation e.g. thermographs.

II.1.9 This attestation is only relevant to raw material derived from animals which have been treated with certain substances prohibited by Directive 96/22/EC that require such material to be classed as Category 1 material.

As there is no provision made in EU regulation to mark it as deletable text and it already considers that there will be consignments where this attestation does not apply, we recommend leaving this paragraph intact even if it does not apply for the goods being certified.

If it does apply, the certifier must verify compliance with the conditions stated on lines (a) to (c) of this attestation when issuing the certificate.

If imported Category 1 ABP material is used the OV should refer to Section 6 - CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE) for guidance.

II.2 does not relate to the GB and should be deleted in its entirety.

II.3 BSE risk status

NOTE: THIS ATTESTATION ONLY APPLIES WHERE ABP OR ABP PRODUCTS ARE DERIVED FROM RUMINANTS.

Species material other than ruminants.

This section should be deleted in its entirety.

The OV should obtain a written declaration from the exporter confirming the species of the source materials. The OV must be familiar with the plant sourcing procedures and complete a documentary check of the records.

Ruminant species material other than bovine, caprine or ovine only

In accordance with Commission Decision 2007/453/EC, England, Scotland, and Wales are controlled BSE risk in UK.

BSE status of Member States or third countries or regions thereof according to their BSE risk:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02007D0453-20200702&qid=1607603814945>

If GB sourced ABP material or ABP products are used, only the “**either**” option of the second paragraph (“are derived from ruminants other than bovine, ovine or caprine animals”) should be signed for.

The OV must obtain a written declaration from the exporter confirming the species of the source materials. The OV must be familiar with the plant sourcing procedures and complete a documentary check of the records.

Bovine, caprine or ovine species material only

In accordance with Commission Decision 2007/453/EC, England, Scotland, and Wales are controlled BSE risk in UK. All specified risk material (SRM) associated with controlled BSE risk status as described on Commission Regulation (EC) No 999/2001 must be removed from the product intended for dispatch to the EU or NI as required by EU legislation and UK TSE legislation.

BSE status of Member States or third countries or regions thereof according to their BSE risk: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02007D0453-20200702&qid=1607603814945>

If GB sourced ABP material or ABP products are used, only the last “**or**” subparagraph (“do not contain:”) and respective sub-subparagraphs **(a)** to **(c)** should be signed for.

Sub-subparagraph **(a)** can be signed if the material does not contain SRM material associated with controlled BSE risk status as described on Commission Regulation (EC) No

999/2001. The OV must be familiar with the plant sourcing procedures and complete a documentary check of the records.

Sub-subparagraph **(b)** can be signed provided the GB sourced ABP material or ABP products do not contain mechanically separated meat obtained from bones of bovine, ovine or caprine animals.

Sub-subparagraph **(c)** can be signed provided the GB sourced ABP material or ABP products were not obtained from bovine, ovine or caprine animals slaughtered (after stunning) by gas injection or by pithing.

OVs might have to rely on further supporting documentation such as Support Health Attestations (SHAs) to certify these attestations.

Imported material:

If imported ABP material has been used then the OV should refer to Section 6 (CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE)) for advice on obtaining the necessary certification to be able to determine the correct subparagraphs to sign. Once obtained then the accompanying certificate or attestation should be consulted to determine which sub paragraph is applicable and the OV should delete any non-relevant sub paragraphs accordingly.

4. NOTIFIABLE DISEASE CLEARANCE

Some export certificates for animals and animal products will include statements that will require the OV to certify that specified areas or the entire country of origin are free from certain diseases.

Where it is possible for the CO (OV or Environmental Health Officer (EHO)) in Great Britain to obtain disease clearance themselves, the Centre for international Trade – Carlisle (CITC) will not issue a 618NDC notifiable disease clearance.

COs must check the following sources of disease information for the United Kingdom immediately prior to certification, to ensure disease freedom statements can be certified:

- the Notifiable Disease Occurrence List for Great Britain ([ET171 Notifiable disease occurrence list for Great Britain and Northern Ireland](#)) available on the [Official Veterinarian Training](#).
- the UK Status for Non-Notifiable Diseases Relevant to Export Certification ([ET152 UK status for non-notifiable disease relevant to export certification](#)) available on the [Official Veterinarian Training](#).

For Great Britain:

In the absence of a specific Notifiable Disease Clearance (618NDC) from CITC: COs may certify that GB has disease free status or region free status for those diseases mentioned in the health certificate, once they have checked the disease list(s) for the last occurrence of the disease, and have ensured it complies with the time frames in the certificate.

In the event of a disease outbreak that affects a CO being able to obtain their own disease clearance, CITC will notify COs to make it clear which disease freedom statements should not be certified and where necessary, will issue a 618NDC notifiable disease clearance if the EHC can continue to be issued for certain regions that retain free status.

In the event of a disease outbreak after the EHC has been issued that affects the disease clearance, COs must not certify the EHC and must contact CITC immediately for advice on whether certification can still take place. If a disease outbreak affects the CO disease clearance procedures for this EHC, a 618NDC will be reinstated by CITC which will be issued with the EHC until a time when CO disease clearance can be reinstated.

For any postcodes in Northern Ireland, COs can obtain clearance using the interactive map provided by DAERA that can be found here: [AI Trade Map](#)

NOTE: This does not apply to Transmissible Spongiform Encephalopathies (TSEs) or Bovine Tuberculosis (TB) freedom statements.

5. COLLECTION OF EVIDENCE

Personnel may be authorised to collect evidence which may be used to support veterinary certification. In GB, the Certification Support Officer (CSO) role has been developed by APHA.

CSOs can be utilised by OV's for gathering evidence relating to this certificate. The CSOs must be authorised by APHA and they must hold the appropriate Official Controls Qualification (Animal Health Professional) (OCQ (AHP)-CSO) qualification.

The OV must direct the CSO as to how and where any necessary evidence relevant to the requirements of the Export Health Certificate (EHC) should be obtained. CSOs may not carry out any functions that require the exercise of veterinary judgement, and are restricted to the execution of administrative checks.

They may only carry out such inspections, factual verification and evidence collection as specified by the directing OV, who remains responsible for the certification of the product. CSOs are not authorised to sign an EHC in their own right or on behalf of an OV.

Any documentary evidence collected by the CSO must be stamped, signed and dated by the CSO, before being submitted by them as supporting evidence to the OV. It is required

that the OV is familiar with the product process and evidence required to start with, before directing the CSO to provide future evidence on an ongoing basis.

Additional guidance and principles of implementation are provided in the OV Instructions Exports [document](#) of the APHA Official Veterinarian Training.

6. CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE)

This section of the guidance applies to exports to the EU and movements from GB to NI but does not apply to movements of retail products to NI under the Northern Ireland Retail Movement Scheme (NIRMS).

An ABP consignment for export from GB can contain animal products that originate from NI, EU and third countries, only if those products have undergone further processing in GB. Processing should be understood in the context of Commission Regulation (EU) No 142/2011 and is different than the definition that applies in the context of products of animal origin for human consumption.

ABP imported to GB, which is only unloaded, stored, and reloaded, or which is only rewrapped in GB, cannot be re-exported to the EU or moved to NI except under the NIRMS or under the customs transit procedure (see below). Guidance on triangular trade can be found here: [Triangular Trade Briefing Note \(ABP\)](#).

To avoid the restrictions applicable to triangular trade, businesses can make use of the customs transit procedure for goods from third countries landed in GB, to move through GB, directly to NI. Consignments being moved under the customs transit procedure are not subject to triangular trade rules. Guidance on the transit procedure can be found in the triangular trade briefing note above.

7. GB APPROVED ESTABLISHMENTS TO EXPORT TO THE EU

The exporting establishment must be authorised and listed by GB as a 'GB approved establishment' for animal by-products not for human consumption (ABP). In March 2025, the EU TRACES team confirmed that slaughterhouses and fishery vessels which are already listed as approved for exports of animal products intended for human consumption do not require an additional ABP-specific listing. A list of approved establishments can be found on the European Commission's list of approved establishments' link below:

https://ec.europa.eu/food/safety/international_affairs/trade/non-eu-countries_en

Please note that the list is updated regularly and ONLY establishments on the list are approved to export to the EU and does not include establishments with pending applications for approval/registration.

If the final product contains animal products from other establishments, or products were previously processed in different establishments in the production chain, then these establishments should also be listed on the EU website as GB approved establishments.

For approved establishments in Northern Ireland the “EC” suffix which is present in the health/ID mark of approved food establishments, should not be included when referring to establishment approval numbers in the certificate. This may also be relevant to certain ABP consignments – e.g. where the ABP is generated at an approved slaughterhouse without separate ABP approval.

8. CERTIFIED COPIES OF EXPORT HEALTH CERTIFICATES

When completing export certification, the CO and, if applicable, FCCO must make photocopies of, or scan and save all documents they certify. OV's must retain copies of certification documents in accordance with RCVS Certification principles:

<https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/certification/>

COs must retain copies of all export documentation for a period of two years. A certified copy of this EHC does not need to be returned to the APHA CITC. For the purposes of completing routine Quality Assurance checks on export certification, CITC may request certified copies of certification from COs.

Further details on Post Certifying Procedures, ‘certified copies’ of certification and the types of documents that should be retained by COs can be found on the OV Instruction Exports [document](#) of the APHA Official Veterinarian Training.

9. LEGAL STATEMENT

The existing EU legislation that the UK complied with prior to the end of the Transition Period has been incorporated into our domestic law as “assimilated EU law” under the European Union (Withdrawal) Act 2018. References in our guidance and certification to such EU instruments should be taken to be references to this “assimilated EU law”. The EU standards that this legislation includes continue to remain in force, without substantive amendment, as part of UK domestic law (apart from corrections to make the EU legislation fully operable).

10. 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 in Carlisle, via the link below: <https://www.gov.uk/government/organisations/animal-and-plant-health-agency>

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Version History:

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II.1.9 - Amendment is made to clarify guidance about material derived from animals which have been treated with certain substances prohibited by Directive 96/22/EC.

Section 6 - CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU MEMBER STATES OR FROM THIRD COUNTRIES (TRIANGULAR TRADE) is amended to align with the [Triangular Trade Briefing Note \(ABP\)](#).

Version 15: Published June 2025

II.3 - Updated to reflect change to WOA's risk status for GB.

NOTIFIABLE DISEASE CLEARANCE – Section amended to include reference to AI map for NI

Version 14 Published 16 May 2025

Section 7 - Updated to clarify point regarding ABP specific TRACES listing for slaughterhouses and fishing vessels.

Version 13 Published 13 December 2023

II.3 - BSE risk status: Is amended to further clarify how to certify GB sourced bovine, ovine and caprine ABP material.