Department for Environment, Food and Rural Affairs

Export of raw pet food for direct sale or animal by-products to be fed to fur animals intended for dispatch to or for transit through the European Union (EU) or Northern Ireland (NI)

November 2025

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No: 8306 NFG

For export of raw pet food for direct sale or animal by-products to be fed to fur animals intended for dispatch to or for transit through the European Union or Northern Ireland.

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

1. APPLICABLE LEGISLATION

<u>Council Regulation (EC) No 1069/2009</u> and <u>Commission (EU) Regulation 142/2011</u> (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 raw pet food for direct sale or animal by-products to be fed to fur animals 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 8306 veterinary certificate maybe used for the export of raw pet food for direct sale or animal by-products to be fed to fur animals 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.

Raw pet food is defined as pet food containing certain Category 3 material which has not undergone any preserving process other that chilling or freezing

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.

A fur animal is defined in Annex I of Regulation (EU) No 142/2011 as being an animal kept of reared for the production of fur and not used for human consumption.

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 Member States (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 Heath 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 pages of the schedule (if any) at the bottom.

As per general guidance for certifiers on APHA's Official Veterinarian Training, any hand written 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 1. 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.

Instruction: Official Veterinarian Training

We advise that individual stamping and initialling of diagonal lines drawn through blank boxes in Part 1 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 1 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 the EHCO guidance for Certifiers in the link below.

Using export health certificate (EHC) online: certifier guidance - GOV.UK

UK approved establishments will be uploaded to <u>Europa</u> 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

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 products being consigned.

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

II and II.1 The OV signing the export health certificate must have read and understood Regulations (EC) No 1069/2009, in particular Article 10, and Commission Regulation (EU) No 142/2011, in particular Chapter II of Annex XIII and 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.

The starting material used must be a Category 3 ABP. Category 3 materials are low risk materials; includes parts of animals that have been passed fit for human consumption in a slaughterhouse, but which are not intended for consumption, either because they are not parts of animals that we normally eat or for commercial reasons.

The correct sub-category or sub-categories of ABP under II.2, II.3. must be selected, and the other sub-categories deleted as instructed. Familiarity with the sourcing arrangement of the raw material by the establishment is necessary to ensure the correct sub-category or sub-categories is/are selected. This might be supported by a suitably worded statement from the slaughterhouses or animal facility as appropriate.

II.2 Starting/source material

II.2 (a) This subparagraph requires that the ABPs are derived from animals in Third Countries listed for the import into the EU of the relevant category of meat. The list of third countries (territories, zones or compartments) from which the meat products can be imported, the codes and the veterinary certification requirements are detailed in the Commission Regulations (EU) No 206/2010 (ungulates), 798/2008 (poultry) & 119/2009 (lagomorphs):

- The first point refers meat derived from ungulates; i.e. ruminants and pigs.
- The second point refers meat derived from poultry.
- The third point refers to imported meat derived from wild leporidae, wild land mammals other than ungulates and leporidae, and farmed rabbits.

 Non applicable options must be deleted.
- II.2 (b) & (c) These subparagraphs might be certified on the basis of the approval or registration of the slaughterhouse in line with the guidance provided in Section 7 "GB Approved Establishments" and disease freedom detail through the process described in Section 4 "Notifiable Disease Clearance".
- II.2 (d) This subparagraph refers to feed for fur animals derived from aquatic animals (bivalve molluscs, echinoderms, tunicates, marine gastropods and fishery products.) and must be deleted if not applicable. If applicable option (c) must be deleted.

II.3. Source materials

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 written declarations-confirming source material content.

The correct subcategories of ABP must be selected in relation to the intended purpose and the others deleted as instructed.

- II.3.2 relates specifically to feed for fur animals only. Suggestion to delete II.3.2 if not for fur animal feeding.
- II.4 The OV should have due familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the establishments. This should be supported by physical inspection and relevant documentation such as written declaration from the plant operators that the conditions have been met.

This paragraph may be certified on the basis of the approval or registration of the premises involved in the processing, manufacturing, handling, labelling and storage of the product. Refer to Section "UK Approved Establishments". The OV may ask to see the Approval Document.

II.5 The consignment must be packaged in leak proof boxes or containers, labelled as with the label appropriate to the intended purpose (2 options detailed in the statement) and with the name and address of the destination establishment. The boxes or containers must be officially sealed.

The OV must establish that the conditions in relation to hygiene, the leak proof nature and labelling of the packaging containers are met through knowledge of procedures in place at

the establishment, visual inspection and supported by inspection of records and valid declarations by the plant operator.

II.6 (a) This can be established and certified through the procedures detailed at GB APPROVED ESTABLISHMENTS TO EXPORT TO THE EU.

II.6 (b) Bacteriological testing for raw pet food

This may be signed on the basis that the processing establishment is approved in accordance with Council Regulation EC 1069/2009, familiarity with the processing establishment's routine testing/monitoring regime and in particular on sight of satisfactory laboratory test results relating to a batch of the specific consignment being exported and checking of relevant records. The consignment should remain identified and accessible to the OV/CSO until these results are available and the certificate is signed.

II.7 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

Commission Implementing Decision (EU) 2025/2208 amended the Annex to Decision 2007/453/EC as regards the BSE status of the region of England and Wales, and the region of Scotland in the United Kingdom, listing them as regions with a negligible BSE risk.

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

Bovine, caprine or ovine species material only

Commission Implementing Decision (EU) 2025/2208 amended the Annex to Decision 2007/453/EC as regards the BSE status of the region of England and Wales, and the region of Scotland in the United Kingdom, listing them as regions with a negligible BSE risk.

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.

There are two 'either/or' sections under II.7 relating to BSE risk of the country/region of origin of the animals from which the ABP material was derived:

- The first "either" where the pet food or the animals from where the ABP is derived originate from a country or region which is classified as negligible BSE risk in accordance with Decision 2007/453/EC and in which there have been no cases of indigenous BSE cases. This option cannot be selected for ABP derived of GB animals, as there had been cases of indigenous BSE in GB.
- The first 'or' option where the pet food or the animals from where the ABP is derived originate from a country or region which is classified as a negligible BSE risk in accordance with Decision 2007/453/EC and in which there have been cases of indigenous BSE and the animal by products or derived products were derived from animals born after the date from which the ban on the feeding of ruminants with meat and bone-meal and greaves derived from ruminants as defined in the WOAH code. This option can be selected for GB origin derived products as there is a ruminant feed ban implemented in GB under regulation 999/2001.
 - The second 'either' option may be certified if the ABP materials are derived from ruminants other than bovine, ovine or caprine animals. 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.
 - The second 'or' option may be certified if the ABP materials are derived from bovine, ovine or caprine animals. This option offers two further two points:
 - The first "either" point may be certified if the animals from which ABP material was derived were born, continuously reared and slaughtered in GB or in a country or region classified as negligible BSE risk in accordance with Decision 2007/453/EC. Further evidence such as a support health attestation may be required to support certify this option.
 - The "or" point may be certified if the ABP product/material complies with all the following subparagraphs:
 - Sub-subparagraph (a) if the material does not contain the SRM material specified for controlled or undetermined BSE risk status as defined by Commission Regulation (EC) No 999/2001.
 - Sub-subparagraph (b) provided the ABP material or ABP products do not contain mechanically separated meat obtained from bones of bovine, ovine or caprine animals from controlled or undetermined BSE risk status countries or regions, or from countries or regions with negligible risk status where there have been indigenous BSE cases.

 Sub-subparagraph (c) provided the ABP material or ABP products were not obtained from bovine, ovine or caprine animals slaughtered (after stunning) by gas injection or by pithing, if they were not born, continuously reared and slaughtered in a country or region with negligible BSE risk.

Imported material

If imported ABP material can be 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).

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 (<u>ET171 Notifiable disease</u> occurrence list for Great Britain and Northern Ireland) available on the <u>Official Veterinarian Training.</u>
- the UK Status for Non-Notifiable Diseases Relevant to Export Certification (<u>ET152</u>
 <u>UK status for non-notifiable disease relevant to export certification</u>) available on the
 <u>Official Veterinarian Training</u>.

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 lists 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: Al 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 OVs 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 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 Export document section of the APHA Official Veterinarian Training.

6. <u>CONSIGNMENTS OR PARTS OF THE CONSIGNMENT ORIGINATING FROM, NI, EU</u> 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 Northern Ireland 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 into 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

To avoid the restriction 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 the GB as a 'GB approved establishment' for ABP not for human consumption. 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.

8. <u>CERTIFIED COPIES OF EHCS</u>

When completing export certification CO (OVs and Environmental Health Officers (EHO)) must make photocopies of, or scan and save all documents they certify. This includes all documents that:

- are certified with the COs signature and stamp
- form part of any export documentation
- will accompany the consignment, or
- any support documentation (documentation provided by the CO at the premises of origin to enable the CO at the premises of loading to certify the final export certificate).

Examples of export documents required to be saved are:

- EHCs
- Supplementary certificates

Schedules to EHCs.

Where it is impossible to copy documents at the premises immediately after certification then a photocopy of the certificate could be made before travelling to the place of certification, and the certification details transposed onto the copy at the same time as completing the certificate. When a paper copy is made, mark the photocopy as 'Certified Copy' and initial.

COs must retain copies of all export documentation for a period of two years.

Return of export documents to the Centre for International Trade - Carlisle (CITC) are only required for the following live animal export commodities:

- cattle
- pigs
- sheep
- goats
- Camelids

This should be done by scanning and emailing the documents on the same day as certification.

These certified copies are required to enable APHA to provide information to other Competent Authorities on Brucellosis, Tuberculosis or Bovine Spongiform Encephalopathy cases found in herds subsequent to export, to enable the country of destination to take the appropriate notifiable disease action.

For the purposes of completing routine Quality Assurance checks on export certification, CITC may request certified copies of certification from COs.

Please visit APHA <u>Official Veterinarian Training</u> for further information about certification procedures in the OV instruction Export document.

9. <u>LEGAL STATEMENT</u>

References in this guidance to "assimilated EU Regulation" should be interpreted as references to assimilated law, as defined under the European Union (Withdrawal) Act 2018.

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 contact the APHA Carlisle, link below: exporter should in via the https://www.gov.uk/government/organisations/animal-and-plant-health-agency

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Any enquiries regarding this publication should be sent to us at product.exports@apha.gov.uk

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Version 9: Published November 2025

II.7 BSE risk status – Section updated to reflect EU recognition of change to GB's BSE risk status to negligible.

Version 8: Published Sep 2025

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)

References for Vet Gateway replaced by APHA's Official Veterinarian Training.

Legal statement is updated.

Version 7: Published June 2025

II.7 - BSE attestation guidance amended to reflect additional evidence requirements following change to WOAH's published GB BSE risk status.

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

Version 6 Published 16 May 2025

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

Version 5 Published 13 December 2023

II.7, BSE risk status: Is amended to further clarify how to certify GB sourced bovine, ovine and caprine ABP material.