

NOTES FOR THE GUIDANCE OF THE CERTIFYING OFFICIAL VETERINARIAN AND EXPORTER

In relation to 8917EHC titled:

EXPORT OF DEER SKINS TO THE PEOPLE'S REPUBLIC OF CHINA

Associated Documents: 8917EHC and 618NDC.

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 8917EHC. 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 only be used for the export from the United Kingdom to the People's Republic of China of deer skins which were:

- (a) **Either**
obtained from farmed deer born and reared in the United Kingdom;

Or
obtained from legally hunted wild deer.
- AND**
- (b) frozen, or salted, or dried as described in **paragraph IV 2 of the certificate**, or subjected to another process permitted under **paragraph IV 2 of the certificate**.
- AND**
- (c) in the case of skin from wild deer, subjected to an insecticide treatments required **under paragraph IV 3 of the certificate** and transported in containers fumigated as required **under paragraph IV 15 of the certificate**.
- AND**
- (d) produced in a UK establishment specifically registered by the General Administration of Customs of the People's Republic of China (GACC) with respect to deer skins - see **paragraph 3** below.

2. Import Permit

Prior to making arrangements to export deer skins to the People's Republic of China, exporters are advised to ensure that the necessary import permit and any other relevant import documentation is available.

Applications for import permits are usually made by the Chinese customer or the local import company in China and tend to be specific to the UK exporter.

3. GACC Registration of Deer Skin Establishments

An establishment producing the deer skins for export to the People's Republic of China (the "deer skin establishment") **must be specifically registered by the General Administration of Customs of the People's Republic of China (GACC)**

Registration with GACC is also a requirement for cold stores storing frozen deer skins for export to China.

This GACC-registration requirement is in addition to compliance with the domestic requirements applicable to the deer skin establishment in the UK.

Deer skin establishments which are eligible to export to China are only those included in the current list of registered establishments maintained by GACC. At the time of writing, this list is published at: <https://scintl.chinaport.gov.cn/aprwebserver/pages/apr/public/html/companyList.html>

Details of the UK establishments registered to export deer skins to China can be viewed by choosing the following options at the above website, and then clicking the "Query" button:

Option	Value
国家或地区 Country/Region	[GBR]英国 United Kingdom of Great Britain and Northern Ireland (the)
产品类型 Product type (English)	非食用动物产品 (含肥料等) Non-edible animal products (including fertilizers)
产品种类 Product category (English)	皮张类 Animal skin

A deer skin establishment **cannot be considered to be registered for export to China until it appears in this list**, even if Defra has submitted its details to GACC.

Note that GACC's list includes a "产品名称 Product name" column for each establishment, and for registered UK deer skin establishments this is typically completed with the phrase "Deer skins", but other similar terms may also be used.

If the deer skin establishment is not currently registered, they must contact APHA's Centre for International Trade at Carlisle or DAERA, as appropriate, who will guide them through the process.

4. CERTIFICATION BY AN OFFICIAL VETERINARIAN (OV)

This certificate may be signed by an OV appointed by the Department for Environment, Food and Rural Affairs, the Scottish Government, Welsh Government or the Department of Agriculture, Environment and Rural Affairs (DAERA) Northern Ireland, who is on the appropriate panel for export purposes or who holds the appropriate Official Controls Qualification (Veterinary) (OCQ(V)) authorisation.

The health certificate must be signed and stamped with OV stamp in any ink colour **OTHER THAN BLACK**.

Certified Copy Requirements - England, Wales and Scotland

Guidance concerning return of certified copies of EHCs has changed and only specific certified copies are required to be returned to the APHA. Certifying OVs must return a certified copy of EHCs only for the following EHC types:

- if the exported commodity is cattle, pigs, sheep, goats or camelids;
- if the certificate was applied for manually and the application documents have been emailed to APHA and not applied for via the Exports Health Certificates Online (EHCO) system.

Certified copies should be emailed on the day of signature to the Centre for International Trade Carlisle (CITC) at the following address: certifiedcopies@apha.gov.uk.

For certificates that have been issued to the Certifying OV via the EHCO system, the Certifying OV must complete the certifier portal with the status of the certificate and the date of signature.

A copy of all EHCs and supporting documentation certified must be retained for two years.

Certifying OVs are not required to return certified copies of other EHCs issued, however CITC may request certified copies of EHCs and supporting documentation in order to complete Quality Assurance checks or if an issue arises with the consignment after certification.

DAERA Export Health Certificates: provision of certified copies

Authorised Private Veterinary Practitioners (aPVPs) certifying DAERA Export Certification System(DECS) produced EHCs must return a legible, scanned copy of the final EHC to the relevant DAERA Processing Office within 1 working day of signing.

Good quality photographic copies will be accepted by the Department where obtaining a scanned copy is not feasible - for example, where 'on site' certification is undertaken and scanning facilities are not available.

For record purposes, a copy of the final Export Health Certificate and associated Support documents should be retained by the aPVP for a period of 2 years from the date of certification.

The Department will carry out periodic audits of all aspects of export certification to ensure that a high standard of certification is being maintained.

5. NOTES ON COMPLETION OF 8917EHC

Important note to certifying OVs

Certificate entries must be fully typed/printed.

Certifying OVs must note that unauthorised deletions or manuscript amendments to 8917EHC are not permitted.

The only permitted handwritten entry is the signature of the OV.

The OV stamp is to be inserted ONLY on the space provided (next to the OV signature).

If the final date of certification cannot be typed in, this may be entered with a rubber stamp using ink of any colour OTHER THAN BLACK.

Consistency in recording details:

Both the OV and the exporter should note that it is imperative that the details on the EHC, and on all documents accompanying the consignment, match those displayed on GACC's list of registered overseas establishments referred to in **paragraph 3 above**, and published at:

<https://scintl.chinaport.gov.cn/aprwebserver/pages/apr/public/html/companyList.html>

And that consistency is maintained across all accompanying documentation.

OVs and exporters have the final responsibility to ensure that the details on the completed certificate are correct.

Due to the complexity of the conditions, it is recommended that such checks should be carried out sufficiently in advance of the date of export to enable any changes that may be required. The Chinese authorities will expect that the details of the establishments entered onto the certificate are correct and consistent.

6. PARAGRAPHS II(b) and II(c) - PROCESSING ESTABLISHMENT AND COLD STORE

For the purposes of this paragraph, the processing establishment at **paragraph II(b)** is the establishment where the skins were frozen or treated as described in **paragraph IV 2** of the certificate. This could be a slaughterhouse, a game-handling establishment, an animal by-product establishment or a separate cold store.

This corresponds to the GACC-registered deer skin establishment referred to in **paragraph 3 above**.

If the deer skins are frozen as described in **paragraph IV 2** of the certificate, the details of the cold store must be entered into **paragraph II(c)**, and the cold store must be registered by GACC as described in **paragraph 3 above**. It may therefore be necessary for the same details to be entered in both **paragraph II(b) and II(c)** if the cold store is co-located with the deer skin establishment.

For deer skins which have not been frozen, "NOT APPLICABLE" should be entered at **paragraph II(c)**.

The relevant establishment's name, address and UK approval number, **as it appears in GACC's online list** of registered establishments, must be entered at **paragraphs II(b) and II(c)**.

Slaughterhouses, Game-handling establishments and cold stores must be approved in accordance with the **Food Safety and Hygiene (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 the EU Hygiene package, which includes **assimilated Regulations (EC) 852/2004, 853/2004, and 2017/625**.

Animal by-product establishments 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 the **assimilated Regulation (EC) 1069/2009**.

The approval and associated number may be certified on sight of a valid approval document, or by reference to the appropriate enforcement authority responsible for the establishment (for example, FSA, FSS, Local Authority, APHA or DAERA).

7. PART IV - HEALTH INFORMATION

OVs may certify this section 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.

PARAGRAPH IV 1 - Origin of the live animals

This requires that the deer were either born and raised on a UK holding, or they were wild animals legally hunted in the UK.

This may be supported by relevant declarations from a representative of the deer skin establishment or another individual who has the appropriate knowledge and responsibility to confirm this.

Advice regarding the CITES status of the species involved may be obtained by contacting the APHA Centre for International Trade in Bristol, via the details below:

Tel: +44 (0) 117 372 3700

Email: wildlife.licensing@apha.gov.uk

PARAGRAPH IV 1 - No clinical signs of infectious or contagious diseases

This may be certified on the basis of the ante- and post-mortem examinations carried out on the animals from which the deer skins were obtained. It is important to reiterate that this EHC requires the animals to have undergone ante-mortem examination and post-mortem examination.

PARAGRAPH IV 1 - Free from vectors such as mosquitoes, flies, ticks, or gadflies

This requires the deer skins to be "free from vectors such as mosquitoes, flies, ticks, or gadflies".

This may be interpreted to mean that the deer skins are free from obvious signs of infestations by mosquitos, flies, ticks, gadflies, and other animal disease vectors.

This assessment may be made before or after the freezing or treatment described in **paragraph IV 2** of the certificate, however, the deer skin establishment must be confident that the exported deer skins would be capable of passing any reasonable examination which may be carried out in the importing country for signs of these and similar animal disease vectors.

This may be supported by declarations provided by the persons performing the ante- and post-mortem examinations of the animals confirming that "there were no signs of vectors such as mosquitoes, flies, ticks, or gadflies".

PARAGRAPH IV 2 - Processing requirements

It is expected that one of the first three options will be certified in most cases.

The fourth option, the use of an alternative method as outlined in the WOAHA Terrestrial Animal Health Code, is only likely to be necessary in the event of a notifiable disease outbreak in the UK for which the WOAHA Terrestrial Animal Health Code lays down a treatment for the inactivation of the disease pathogen in ruminant hides and skins. In such cases, the details of the treatment must be entered into the space provided.

The processing options which are not to be certified should be neatly struck through.

This paragraph may be certified on the basis of the certifying OV's familiarity with the procedures in place at the deer skin establishment, supported as necessary by relevant processing records, documentation and/or declarations.

PARAGRAPH IV 3 - Insecticide treatment

This insecticide treatment requirement only applies to deer skins obtained from wild animals. However, **this paragraph must not be deleted** if the deer skins were only obtained from farmed animals.

If the suggested treatment with 2% peracetic acid is used, this must be applied before the skins are processed as described in **paragraph IV 2**.

If an alternative insecticide treatment method is used, the exporter is strongly advised to confirm, via their importer, that it is acceptable to the Chinese authorities prior to export.

PARAGRAPH IV 4 - Prevention of cross-contamination, mould, rot and disease vectors

This paragraph may be certified on the basis of the certifying OV's familiarity with the procedures in place at the deer skin establishment, supported as necessary by relevant documentation or declarations.

The deer skin establishment must be confident that the exported deer skins would be capable of passing any reasonable examinations which may be carried out in the importing country.

PARAGRAPH IV 5 - UK notifiable disease freedom

UK freedom from **foot and mouth disease** (FMD) and **peste des petits ruminants** (PPR) may be certified on behalf of the Department provided written authority to do so has been obtained on form **618NDC** from the APHA CIT at Carlisle or via disease clearance procedures in DAERA.

PARAGRAPH IV 6 - Area notifiable disease freedom

For the purposes of this paragraph, the reference to "brucellosis" may be interpreted to mean those strains which can affect ruminant animals, and the reference to "province" may be interpreted to mean "county".

Freedom from **anthrax, Brucella melitensis and Brucella abortus**, in counties from which the animals originated during the **6 months prior to slaughtering/hunting** may be certified on behalf of the Department provided written authority to do so has been obtained on form **618NDC** from the APHA CIT at Carlisle or via disease clearance procedures in DAERA.

PARAGRAPH IV 7 - Not under notifiable animal disease restrictions or monitoring

This may be certified on the basis that the deer did not come from holdings which were under official restrictions or enhanced surveillance due to the outbreak of a notifiable disease which can be transmitted through raw deer skins, in accordance with WOA's Terrestrial Animal Health Code.

In practice, this relates to official restrictions or enhanced surveillance as a result of an outbreak of the following diseases:

 Anthrax;
 Brucella melitensis;
 Brucella abortus;
 Foot and mouth disease;
 Tuberculosis;
 Rinderpest;

This may be certified on behalf of the Department provided written authority to do so has been obtained on form **618NDC** from the APHA CIT at Carlisle or via disease clearance procedures in DAERA, confirming that either the UK or the holdings were not under applicable notifiable disease restrictions.

PARAGRAPH IV 8 - Manufactured in approved and supervised establishment

This paragraph requires that the deer skin establishment producing the deer skins for export is suitably approved and supervised and employs a traceability system covering the identified elements.

This may be certified on the basis that the deer skin establishment is approved under applicable domestic legislation, supported as necessary by the certifying OV's knowledge of the deer skin establishment and relevant documentation.

Slaughterhouses, game-handling establishments and cold stores must be approved in accordance with the **Food Safety and Hygiene (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 the EU Hygiene package, which includes **assimilated Regulations (EC) 852/2004, 853/2004, and 2017/625**.

Animal by-product establishments 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 the **assimilated Regulation (EC) 1069/2009**.

The approval and associated number may be certified on sight of a valid approval document, or by reference to the appropriate enforcement authority responsible for the establishment (for example, FSA, FSS, Local Authority, APHA or DAERA).

PARAGRAPH IV 9 - Compliance with veterinary sanitary protocols

This may be certified on the basis that the deer skin establishment is suitably approved and supervised, **as described in the guidance above for paragraph IV 8**, and operates in accordance with the terms of its approval.

PARAGRAPH IV 10 - Packaging and carrying container construction

The packaging and the carrying container (such as shipping container) must be made from new or suitably disinfected materials, and the packaging must comply with UK veterinary and public health requirements, with a particular emphasis on being leakproof and robust enough to make the intended journey.

This may be supported as necessary by physical examination and the OV's knowledge of the procedures in place at the deer skin establishment.

PARAGRAPH IV 11 - Labelling of outer packaging

The outer packaging of the deer skins must be clearly marked with the required information.

PARAGRAPH IV 12 - Packaging hygiene

This paragraph requires the packaging to be free from obvious signs of viable pests and potential sources of contamination.

This may be supported as necessary by physical examination and the OV's knowledge of the procedures in place at the deer skin establishment.

The exporter must be confident that the packaging would be capable of passing any reasonable examinations which may be carried out in the importing country for the presence of pests and general soiling.

PARAGRAPH IV 13 - Leakproof carrying container

This paragraph requires the carrying container, for example the shipping container, to be leakproof.

This may be supported as necessary by physical examination and the OV's knowledge of the procedures in place at the deer skin establishment.

PARAGRAPH IV 14 - Storage and transportation

This paragraph requires that effective measures have been taken to ensure the integrity of the consignment whilst in storage and in transit.

This may be supported as necessary by physical examination and the OV's knowledge of the procedures in place at the deer skin establishment.

The person responsible for the load must be confident that the consignment will be capable of passing any reasonable examinations upon its arrival.

PARAGRAPH IV 15 - Fumigation of containers used for loading

This fumigation requirement only applies to deer skins obtained from wild animals. However, **this paragraph must not be deleted** if the deer skins were only obtained from farmed animals.

Whilst this paragraph mentions the use of sulphuryl fluoride, it also allows for an alternative method of fumigation to be used. If an alternative fumigation treatment method is used, the exporter is strongly advised to confirm, via their importer, that it is acceptable to the Chinese authorities prior to export.

8. SUPPORTING DECLARATIONS

If declarations are relied upon to support the completion of this certificate, these must be signed by someone who has knowledge of and responsibility for the relevant parts of the production process. The managing director (or equivalent) of the company should provide a letter giving the name(s) and job title(s) of those authorised to give the declaration and the basis on which the declaration is made.

The declaration should include a clause indicating that the signatory is aware that making a false declaration is an offence and that he/she accepts full responsibility if any problems arise with the export should there be any dispute relating to the matters being declared.

Where possible, supporting evidence should be called for and put on file.

9. 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 - DAERAttradeexports@daera-ni.gov.uk