

EXPORT OF CATTLE HIDES AND SKINS TO THE PEOPLE'S REPUBLIC OF CHINA - 6268EHC

NOTES FOR THE GUIDANCE OF THE CERTIFYING OFFICIAL VETERINARIAN

Associated documents: 6268EHC and 618NDC

IMPORTANT

These notes provide guidance to Official Veterinarians (OV) and exporters. The NFG should have been issued to the Official Veterinarian together with export certificate 6268EHC. The NFG should not be read as a standalone document but in conjunction with certificate 6268EHC. 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 OF THE CERTIFICATE

Export health certificate 6268EHC may be used for the export of cattle hides and skins to The People's Republic of China which were exported from a UK establishment which, at the time of export, is specially registered by the General Administration of Customs of the People's Republic of China (GACC) - see **paragraph 3 below**.

2. CERTIFICATION BY AN OFFICIAL VETERINARIAN (OV)

In the past, the Chinese authorities have expressed concerns over poorly presented examples of export health certificate **6268EHC**, particularly in relation to handwritten entries and amendments made by certifying OVs. Extra care should therefore be taken when completing this certificate.

Any insertions must be typed and the ONLY permitted handwritten entry is the signature of the OV. Any authorised deletions that cannot be typed or entered electronically must be made using a ruler and a fine black pen. Diagonal deletions MUST NOT be used. Each line to be deleted must be ruled out providing an effect similar to that of typewritten deletions. OV stamp 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 using an inked rubber stamp in any ink colour OTHER THAN BLACK.

Because of these procedural requirements, the APHA Centre for International Trade at Carlisle, together with Official Veterinarians, Defra and Industry have developed two possible procedures for issuing the final signed 6268EHC for GB exports.

Provided appropriate checks and inspections are carried out with respect to the procedure being followed, the final 6268EHC can be signed by the Official Veterinarian in accordance with the ten principles of certification as stated by RCVS and adopted by the Federation of Veterinarians of Europe.

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

THE TWO OPTIONS ARE AS FOLLOWS:

OPTION A: (Preferred option)

- Exporter requests the electronic 6268EHC and EXA07 Application Form from APHA Carlisle and electronically completes all the details known to them and emails the part-completed form to the OV.
- OV completes the remaining details.
- Both fully completed forms are emailed back to APHA Carlisle.
- The final certificate is printed by APHA Carlisle and sent to the OV for signature

OPTION B:

- Exporter completes an electronic EXA07 Application Form requesting either a single or block of 6268EHC to be issued to their nominated OV.
- Certificate(s) issued to OV who completes them using a typewriter and stamps as detailed above.

Further details of all of these procedures can be obtained from APHA Carlisle.

For NI exports, DAERA should be consulted on the preferred method of application and issuing the final certificate.

6268EHC 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.

OVs must sign and stamp the health certificate with the OV stamp in any ink colour **OTHER THAN BLACK**.

Foreign text: The Official Veterinarian should note that the foreign text in 6268EHC is an official translation of the English text and the Official Veterinarian is accordingly authorised to complete the export health certificate, even if they are unable to read and understand the meaning of the foreign text.

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

aPVPs certifying DECOL produced Export Health Certificates 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.

3. GACC Registration of Cattle Hide Establishments

Establishments involved in processing cattle hides for export to the People's Republic of China, **must** be specifically registered by the General Administration of Customs of the People's Republic of China (GACC).

This GACC-registration requirement is in addition to compliance with the domestic requirements applicable to cattle hides in the UK.

The UK cattle hide establishments eligible for 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 successfully registered to export 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
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 cattle hides and skins 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 this dictates what the establishment is permitted to send to China.

The establishment's UK registration number, as it appears in GACC's online list of registered establishments, must be entered at **paragraph II (b)** in addition to its name and address.

DEFINITIONS

For the purpose of this certificate:

- a) non-processed cattle hides and skins means cattle hides and skins that have been dried or salted, and does not include raw cattle hides or skins.

Where non-processed cattle hides and skins are being exported, the plant of origin at paragraph II (a) of 6268EHC shall be the slaughterhouse at which the animals were slaughtered and skinned or the warehouse where the hides were stored prior to despatch.

- b) Processed cattle hides and skins refers specifically to tanned, wet-blue or pickled hides and skins.

Where processed cattle hides and skins are being exported, the plant of origin at paragraph II (a) shall be the processing plant where the treatment at paragraph IV 5 was completed.

4. INSPECTION OF PRODUCTS FOR EXPORT

The onus is on the Official Veterinarian to ensure that the consignment identification details are correct. This includes reference to the container number(s) and seal number(s).

The Official Veterinarian can certify the processing of the consignment based on his/her knowledge of the working of the plant and the management systems thereof and on the basis of a risk-based inspection regime. The Official Veterinarian must therefore be fully familiar with the procedures used by the producer and exporter for procurement, processing, storage and transportation of the product for export.

The exporter must cooperate with the Official Veterinarian to establish protocols and procedures which enable the Official Veterinarian to carry out inspections as required and to satisfy themselves that certification of **6268EHC** can be correctly carried out.

Documentary checks, identity checks and, as required, physical inspection must be undertaken as necessary by the certifying Official Veterinarian to enable them to satisfy themselves that they can verify the details given in Section I and paragraphs IV 7. and IV 8. of **6268EHC**.

The Official Veterinarian must exercise reasonable precautions and due diligence when relying on information provided by the exporter or other third parties to ensure that the information is correct and that certification can be carried out.

The inspection of the products for export by the Official Veterinarian is a matter for his/her professional judgement. If the containers/crates of products cannot be examined completely then the Official Veterinarian must decide what proportion of the consignments for export are inspected, either routinely or randomly, to be able to provide certification. An audit trail must be kept in case discrepancies in consignments are subsequently identified and also in case audits are required. Physical inspections must be carried out if discrepancies or other problems are identified and if such problems recur, the frequency of such inspections must be increased.

The Official Veterinarian may wish to carry out their own audits to satisfy

themselves that the consignments for export are correct.

If documentary, identity or physical checks suggest inconsistencies between the information provided and the products for export, the Official Veterinarian must inform the APHA Centre for International Trade at Carlisle or DAERA.

The Official Veterinarian should also contact these offices if they wish to discuss any concerns or questions regarding inspections of consignments or the evidence needed before certificate 6268EHC is signed.

5. SEALING

Paragraph I (f) refers: The seal should be of a type which would be broken or torn if the containers were opened. It is essential that, as with the other documentary details, the seal number(s) recorded on **6268EHC is correct.**

6. SIGNING OF HEALTH INFORMATION (PARAGRAPH IV)

a) **Paragraphs IV 1. & 2.** may be certified on behalf of the Department provided written authority to do so has been obtained from the APHA Centre for International Trade at Carlisle or DAERA on form 618NDC.

b) **Paragraph IV 3.** may be signed on the basis of support documents from the slaughterhouse where the animals from which the cattle hides and skins were obtained were slaughtered. Only cattle hides and skins obtained from animals slaughtered before 8 July 2007 or after 7 August 2008 are eligible for export to China. These dates correspond to the period covered by the trade ban imposed by China on the UK following the outbreak of foot and mouth disease in August 2007. China recognised the UK's FMD-free status on 7 August 2008.

The Administration of Quality, Supervision, Inspection and Quarantine (AQSIQ) in China, have specifically requested that the date of slaughter be inserted in the certificate. We understand this might not always be possible. Therefore, in these cases, we recommend that the wording "before 8 July 2007" or "after 7 August 2008" is inserted in the space provided.

c) **Paragraph IV 4.** may be certified on the basis of the OV's familiarity with the sourcing, procurement, segregation, processing, handling and storage arrangements in place at the exporting establishment, supported as necessary by physical inspection of the premises and examination of relevant documentation and/or records, which could include documentation from the slaughterhouses of origin or a suitably worded declaration from the exporter.

d) **Paragraphs IV 5. or 6.** may be certified on the basis of familiarity of the process and/or appropriate assurances or evidence as deemed necessary by the OV.

e) **Paragraph IV 7 & 8 refer:**
Certification of these paragraphs should be supported as necessary by declarations which are signed by someone who has knowledge of and responsibility for the relevant parts of the commercial 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.

The RCVS Code to Professional Conduct 2012 provides guidance on this and states that "A veterinarian should be asked to certify only those matters which are within his own knowledge, can be ascertained by him personally or are the subject of a supporting certificate from another veterinarian who does have personal knowledge of the matters in question and is authorised to provide such a supporting document. Matters not within the knowledge of a veterinarian and not the subject of such a supporting certificate but known to other persons, eg the farmer, the

breeder or the truck driver, should be the subject of a declaration by those persons only”.

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

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

These declarations may be supported by inspection of the consignment and familiarity with the procedures in the establishments concerned. In order to certify IV 8, the OV should be satisfied that the hides/skins have been obtained, processed, stored and transported in accordance with the requirements, for Category 3 by-products, of Regulations (EC) 1069/2009 and 142/2011 (as amended). In England, this is enforced by the Animal By-Products (Enforcement) (England) Regulations 2011 (as amended). Similar legislation exists in Scotland, Wales and Northern Ireland. The word "obtained" in this context relates to the process of slaughter and subsequent manipulation of the products.

7. 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 Centre for International Trade, Carlisle or DAERA, via the link or e-mail address below:

<https://www.gov.uk/guidance/contact-apha>

DAERA - Email: vs.implementation@daera-ni.gov.uk