Department
for Environment
Food & Rural Affairs

Groupage Export Facilitation Scheme (GEFS)

Guidance for the use of the Groupage Export Facilitation Scheme to facilitate groupage exports from Great Britain to the EU and EEA/EFTA countries (transit or direct export) and movement of products to or through Northern Ireland

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Contents

Notes on using this guidance

This guidance document is intended to be used by exporters, manufacturers, Official Veterinarians (OVs) and Food Competent Certifying Officers (FCCOs) issuing Support Attestations and Certifying Officers (COs).

All references to OVs apply also to FCCOs where the scheme is used to facilitate the export of products that can be certified by an FCCO[1].

The guidance should be read as a whole. All sections apply to the implementation and operation of the Groupage Export Facilitation Scheme (GEFS). It must be read alongside the other legislation and guidance (EU and GB) related to Export Health Certification, including (but not restricted to) the notes for guidance for the relevant Export Health Certificates (EHCs).

It does not specify or set out any financial charges that arise from the operation of the scheme.

Exporters, manufacturers, OVs, FCCOs and COs using this scheme must ensure that they apply the rules set out in the latest published version of this guidance.

[1] Fishery products (EHC8362), honey and other apiculture products (EHC8391), and in some situations, live fish, live crustaceans, products of animal origin from those animals and certain fishery products (EHC8361), live bivalve molluscs, echinoderms, tunicates, marine gastropods and products from these animals (EHC8364) and composites (EHC8350).

Terms used in this guidance

ABP	Animal by-product as defined in Regulation (EC) No 1069/2009.
Batch Declaration	A schedule containing batch-specific information that must be completed by an authorised representative of the manufacturer and accompany the products of that batch to the exporting premises.
CO	Certifying Officer, who is issuing the EHC. There may be more than one, but this guidance will refer to the singular throughout.
Competent authority	A government agency or other organisation legally authorised to make decisions, regulate, or exercise powers in the area of food and feed law and animal health and welfare animal or public health, e.g., Defra, APHA, FSA, FSS or a local authority.
Compliance visit	An in-person or virtual veterinary audit conducted by an OV (or in some instances, an FCCO) to assess the manufacturer's compliance with the requirements of the GEFS, Support Attestation and relevant EHCs.
Consignment	Goods being exported that are covered by the same EHC, conveyed by the same means of transport and come from the same territory (i.e., Great Britain) being of the same type, class or description.
EHCs	Export Health Certificates
EHCO	Export Health Certificates Online, the system through which EHCs are issued.
Exporter	The company or trader listed as the exporter on the EHC.
Exporting premises	The location at which the products are certified for export. This could be a part of the manufacturing establishment or a separate location (e.g., an export depot or consolidation hub.)
FCCO	Food Competent Certifying Officer
Final consumer	The ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity.
Great Britain	England, Wales and Scotland only. The GEFS does not apply to exports from the Crown Dependencies.
Manufacturer	The manufacturer of the products for export, at the point at which they are packaged for the final consumer, including

	manufacturing establishments owned and operated by the exporter.
Manufacturer Declaration	The first part of the Support Attestation, completed by an authorised representative of the manufacturer, detailing the products covered and relevant health information.
OV	Official Veterinarian. All references to OVs in this guidance also apply to FCCOs where the consignment may be certified for export by an FCCO.
OV [or FCCO] Declaration	The second part of the Support Attestation, completed by an OV (or in some instances, an FCCO), validating the information contained in the Manufacturer Declaration based on the findings of their compliance visit.
POAO	Products of animal origin, as defined in Regulation (EC) No 853/2004.
Product identifier	A point of data that can be used to identify a specific product, such as the universal product code/bar code.
Production	For the purposes of GEFS, the product is “produced” when it is fully prepared and packaged for sale to the final consumer, even if it is then placed into long-term storage (e.g., frozen).
Signature	A wet signature on the physical document or a digital signature on an electronic document. A digital signature should be used only where there are sufficient controls and security to avoid unauthorised access to and use of the OV’s electronic identity.
Supplier	An establishment that directly supplies POAO or ABP ingredients to the manufacturer, e.g. slaughterhouse, processing establishment etc.
Supply chain	The network of establishments from which the manufacturer directly sources the POAO or ABP ingredients needed to produce their end product.
Support Attestation (SA)	A two-part document that must be completed by an authorised representative of the manufacturer and the OV (or in some instances, an FCCO) conducting the compliance visit in order for the scheme to be used for the following 30 days. All references to “Support Attestations” in this guidance refer specifically to GEFS Support Attestations.
Transit	Movement from one country to a second country, passing through the territory of a third country.

Unique reference number (URN)	An alphanumerical code assigned to a Support Attestation, used to refer to that specific Support Attestation and included in all subsequent documentation relevant to that Support Attestation, e.g., Batch Declarations. Each Support Attestation must have its own URN and each URN must only be used once.

What is the GEFS?

1. The Groupage Export Facilitation Scheme (GEFS) facilitates the health certification of products intended for groupage export to, or transit through, the European Union (EU) or movement to Northern Ireland by using time-limited Support Attestations.

2. The scheme does not remove or change the requirement for each consignment of products exported to be accompanied by its own Export Health Certificate (EHC) but is designed to facilitate the process for Certifying Officers (COs) to obtain some of the relevant information needed to complete the EHC.

3. A diagram illustrating an example of the scheme's operation is provided in Annex I.

4. The GEFS is intended to provide COs and competent authorities with a sufficient level of confidence in the accuracy of the Support Attestations used within this guidance and their operation under this guidance.

5. The scheme only covers exports or movements from Great Britain using relevant Support Attestations from manufacturers in the UK.

6. The scheme is administered by Defra in Great Britain.

7. The scheme will be reviewed regularly. In the event of closure of the GEFS, six months' notice will be given to members.

What does the scheme cover?

8. The scheme applies to groupage exports of specific categories of products to, or for transit through, the EU and Northern Ireland, produced using animal content only from a defined and traceable network of known GB manufacturers and packaged for sale to the final consumer.

9. Annex II contains a decision tree to help exporters assess if their products are in scope of the scheme. Further guidance is also provided below.

Groupage

10. The GEFS facilitates groupage export, which is an export where:

    - multiple products of the same commodity type (e.g., composite products) are grouped under a single EHC to export as a single consignment.

    - multiple quantities of the same commodity type (e.g., fish products), potentially from several sources, are grouped into the same container. It may be possible

to export these as a single consignment covered by a single EHC or as a mixed load (containing several consignments covered by several EHCs).

- multiple different commodity types (e.g., dairy products and meat products) are grouped in a single container but covered by different EHCs.

Categories of products

11. The GEFS only covers specific categories of products of animal origin (POAO) for human consumption, as detailed below:

- casings
- collagen
- colostrum-based products
- composite products[2]
- dairy products
- eggs/egg products
- fish/fishery products
- frogs' legs
- gelatine
- highly refined products
- honey/apiculture products
- insects
- live bivalve molluscs (considered POAO, not live animals)
- meat products[3]

[2] See GOV.UK guidance: Export or move composite food products. Note that not all composite products require Export Health Certification.

[3] "Meat products" means processed products resulting from the processing of meat or from the further processing of such processed products, so that the cut surface shows that the product no longer has the characteristics of fresh meat. This definition also includes products such as gelatine and collagen which are meat products but require a different EU export certificate to the "meat product" certificate.

- meat preparations[4]
- snails

12. The scheme also covers specific categories of animal by-products (ABP), as detailed below:

    - processed pet food

13. The specific model EHCs that can be used to export goods under the GEFS are listed in Annex III.

14. The GEFS **cannot** be used to export any other product. That means the following products are excluded:

    - live animals
    - germinal products
    - fresh meat
    - raw milk
    - animal by-products (including raw pet food but excluding processed pet food)

15. Some of these excluded products may be exported as part of a mixed load, but they must have been separately certified without the use of a Support Attestation.

Destination

16. The GEFS may only be used where products are being directly exported to, or transiting through, the EU and EEA/EFTA countries, including moving products from Great Britain to Northern Ireland where EHCs are required under the Windsor Framework.

17. A direct export occurs where the products enter the EU and are received by the EU for entry onto the EU market.

18. A transit occurs where the products enter and exit the EU, without the products being received by the EU for entry onto the EU market. The GEFS may only be used for the transit of products through the EU where the final destination is an overseas British territory that does not require additional certification.

[4] “Meat preparations” means fresh meat (including meat that has been reduced to fragments) which has had foodstuffs, seasonings or additives added to it or which has undergone processes insufficient to modify the internal muscle fibre structure of the meat and thus to eliminate the characteristics of fresh meat.

19. The GEFS can be used for movements to Northern Ireland where exporters are using the red lane. For products exported using the green lane, exporters should use the Northern Ireland Retail Movement Scheme (NIRMS)[5].

20. The GEFS **cannot** be used for the export of products to, or for transit through, non-EU and non-EEA/EFTA countries, nor for transit through the EU where the final destination is not an overseas British territory.

Defined supply chain

21. The GEFS may only be used where manufacturers source their POAO or ABP ingredients from a known and documented supply chain, verifiable by an OV.

22. The manufacturer must use a thorough and robust onboarding process for all suppliers. A reasonable level of due diligence must be applied that satisfies the OV that the supplier is compliant with the GEFS' conditions, Support Attestation, and export requirements.

23. The GEFS **cannot** be used to certify products from manufacturers outside of the UK. However, the POAO or ABP ingredients used to produce the products may be sourced from outside the UK where they are legally imported.

Packaged for the final consumer

24. Products exported using the GEFS must be fully packaged for sale to the final consumer. This includes products that are subsequently unpackaged or repackaged at the point of sale to the final consumer (e.g., a pork pie exported whole that is sliced and re-packaged at a deli counter for sale to the final consumer).

25. For products undergoing further processing (e.g., cheese undergoing maturation), the Support Attestation should be issued at the point at which they are packaged for sale to the final consumer, provided that the relevant health and traceability details (as required by the EHC) for the products have been sufficiently recorded at the time of manufacture.

26. Where products are (re-)wrapped and/or (re-)packed and prepared for the final consumer in a different establishment to that in which they were manufactured, the Support Attestation should be issued at the wrapping/packing plant. The OV issuing the Support Attestation must take steps to feel sufficiently confident with the whole manufacturing process to certify the attestations, which may include

[5] See GOV.UK guidance: Northern Ireland Retail Movement Scheme: how to register and seal consignments.

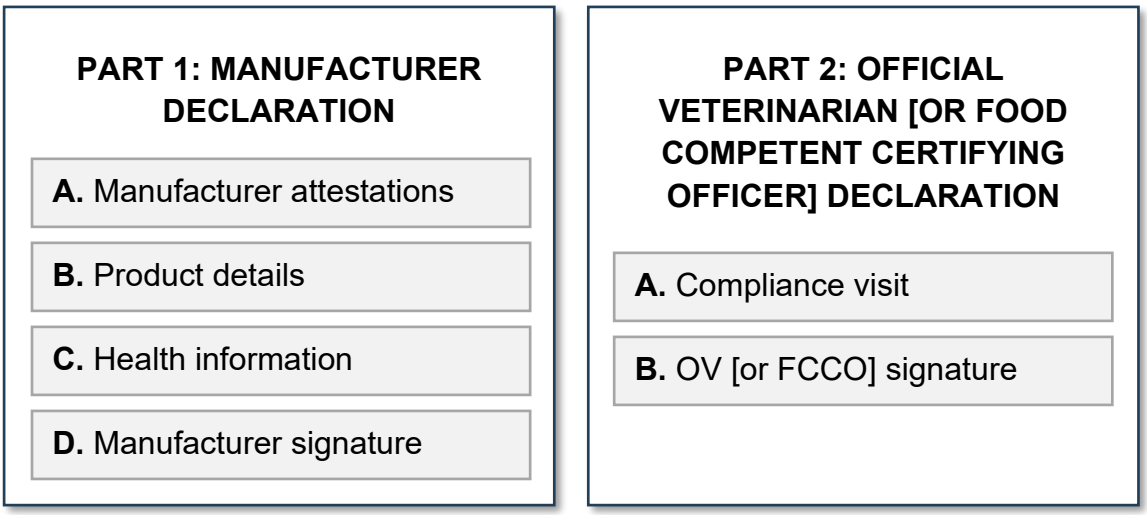
visits to the manufacturing site(s) at appropriate intervals, no less than once per year. Frequency of these visits may be based on factors such as:

- product risk level
- process complexity
- traceability and documentation reliability
- compliance history
- supply volume, and
- any recent changes at the establishment

27. The GEFS **cannot** be used for the export of bulk products for further processing.

How to use the GEFS

28. GEFS members may use time-limited Support Attestations to provide information from manufacturers, who are currently approved under GB legislation[6], to COs at the exporting premises. The structure of a Support Attestation is as follows:



29. Manufacturers must undergo a compliance visit from an OV each time a new Support Attestation is required.

30. The Support Attestation can only be used to provide health and traceability information which is known/verifiable by the OV conducting the compliance visit and issuing the Support Attestation.

31. The Support Attestation templates provided by Defra must be used and are based on the commodities covered and the Support Attestation's issuer as follows:

- SA1: Support Attestation for OVs, covering POAO goods
- SA2: Support Attestation for OVs, covering ABP goods
- SA3: Support Attestation for FCCOs, covering specific POAO goods

32. The Support Attestation templates are issued in PDF format but can be edited to strike through text. Edit functionality must not be used to add to, remove or alter the standardised text. Evidence of editing the standardised text will be deemed a major non-compliance with the scheme's conditions and may result in removal from the GEFS. See paragraphs 141-147 for further details.

[6] Regulation (EU) 853/2004; in the case of composites, registered in line with Regulation EC 852/2004; and in the case of pet food, registered in line with Regulation EC 1069/2009 (assimilated EU law as defined in the European Union (Withdrawal) Act 2018).

33. The Support Attestation templates will be updated by Defra as and when needed to meet changes in the requirements of EHCs. Defra will communicate these changes to GEFS members, OVs and FCCOs.

34. For manufacturers with multiple production sites, it may be possible for one Support Attestation to be issued to cover all sites where the CO is satisfied that:

    - all production sites are operated by the same manufacturer;
    - the OV conducting the compliance visits is able to inspect and gather the required information for all sites;
    - the OV completes an in-person compliance visit to each site at least every three months; and
    - which product was produced at which site is clearly identified on the Batch Declaration.

35. Any products manufactured on the dates covered by the Support Attestation must be accompanied to the exporting premises by a Batch Declaration to confirm the batch-specific information required for certification.

Preparing the Support Attestation

36. The Support Attestation is prepared by the manufacturer and completed in reference to the products they intend to cover using the scheme.

37. A unique reference number (URN) must be assigned to each Support Attestation used. The URN must be assigned to the Support Attestation before it is issued by the OV. The format of the URN should be defined by the exporter.

> **Suggested format**:
> unique supplier number / sequential number / unique number for OV or FCCO signing / year (e.g., 15435/0000001/m159607/2019)

38. Where a manufacturer provides products to multiple exporters using the GEFS, they may either:

    - prepare separate Support Attestations specific to each exporter; or
    - where the exporters agree in writing, use one Support Attestation to cover all those exporters. The exporters may add an additional reference number to the document to align to their own internal information management systems, but they must keep a record of the URN issued at the manufacturing site.

39. Part 1 of the Support Attestation is known as the Manufacturer Declaration. It comprises of four sections, as follows:

A. Manufacturer attestations

40. The manufacturer's representative completing the Manufacturer Declaration must confirm their understanding of the scheme's requirements in relation to the use of Support Attestations.

B. Product details

41. All relevant establishments, including the slaughterhouses, processing establishments, manufacturer, cold store and exporting premises, must be listed with their addresses and/or approval or registration numbers as directed by the Support Attestation template (Parts 1.B.1, 1.B.2 and 1.B.3).

42. Any and all suppliers and POAO or ABP ingredients listed (Part 1.B.3) may be used in any of the products covered by the Support Attestation. Where multiple suppliers supply POAO or ABP ingredients for a single product, the specific supplier and materials used in each batch must be included within the batch-specific information known as the Batch Declaration. See paragraphs 90-99 for further details.

43. The products to be covered by the Support Attestation (Part 1.B.4) must be sufficiently identified using a product identifier such as a universal product code/bar code.

44. One Support Attestation can be used to cover multiple types of products, even where they will be exported using different EHCs.

45. Additional pages (referred to as schedules) may be added to the Support Attestation to continue the tables listed in Part 1.B where required. These must:

    - include the Support Attestation's URN
    - include page numbering, either as an extension of the Support Attestation's pagination or done separately per schedule
    - be clearly titled, using the headings included in the Part 1.B. tables
    - be signed and stamped by the OV issuing the Support Attestation, and
    - include the date on which it was signed and stamped

C. Health information

46. The Support Attestation can only be used to attest to the requirements of EHCs that can be verified at the time of the compliance visit. It includes requirements

that apply to all commodities covered, with additional sections with requirements for specific commodity types[7].

47. Requirements that cannot be verified, that do not apply to the products (e.g., in the case of an either/or requirement) or that are not relevant to that commodity should be deleted by striking through the text where indicated. Strikethroughs do not need to be signed or stamped by the OV issuing the Support Attestation.

48. The Support Attestation **cannot** be used to declare notifiable disease freedom statements in advance but can be used to provide relevant traceability information when the supply chain is known and defined. Identifying establishments or geographic regions from which products originate will assist the CO in obtaining the necessary disease clearance at the time of export.

49. The Support Attestation **cannot** include future batch-specific information which is not known or cannot be verified by the OV when the Support Attestation is issued. This information must instead be provided on the Batch Declaration that accompanies the products to the exporting premises for certification. See paragraphs 90-99 for further details.

D. Manufacturer signature

50. Part 1 must be fully completed and signed by an individual who has both sufficient knowledge of and responsibility for the relevant parts of the production, transport, and storage processes and who has been authorised in writing by the Managing Director (or equivalent) of the manufacturer to sign on behalf of the manufacturer.

51. A template letter is included in Annex IV for manufacturers to provide this authorisation.

52. The manufacturer must discuss with the OV issuing the Support Attestation the earliest date on which Part 1 may be signed.

Compliance visit

53. The manufacturer must provide the OV with the Support Attestation, with Part 1 completed and signed, prior to or during the compliance visit required for the completion of Part 2.

54. Before signing Part 2 and issuing the Support Attestation, an OV with a Product Exports (PX) qualification must conduct a compliance visit.

[7] There are no additional sections for frogs' legs, insects or snails as there are no additional requirements for these commodity types. Similarly, deleting optional statements may mean there are no further requirements for some commodity types (e.g., gelatine of non-ruminant origin).

55. Suitable evidence that demonstrates that the visit took place must be retained by the OV and manufacturer for at least until the product can be reasonably assumed to have been consumed by the final consumer or 12 months, whichever is longer, for auditing purposes. Such evidence may include, but is not limited to, entry logbook records; secure system access logs; diary appointments from the OV or manufacturer; correspondence to arrange, confirm or follow-up after the visit; and any other documentation that reasonably confirms the visit took place. The OV should discuss what might be appropriate with the manufacturer when arranging the visit.

Initial compliance visit

56. The initial compliance visit must be conducted in-person by the OV issuing the Support Attestation.

Assessment of the supply chain

57. The manufacturer must provide evidence to the OV that they apply a sufficiently robust and documented onboarding process to all suppliers regarding assurances for the POAO or ABP ingredients they will supply, as relevant to certification. The OV must be satisfied that a reasonable level of due diligence is applied before POAO or ABP ingredients from a supplier are accepted.

58. The manufacturer must also demonstrate to the satisfaction of the OV that the process has been applied to all existing suppliers by providing the OV with relevant documentation from the supplier and records made during the onboarding process, which may include but is not limited to:

    - Product information
    - HACCP plan
    - Prerequisite programme
    - Guidance for traceability
    - Incident management process
    - Any relevant Standard Operating Procedures (SOPs) or factory processes
    - Any relevant testing regimes

59. The OV must review the documentation and records provided during the onboarding process to verify that all existing suppliers are compliant with the requirements of the GEFS, Support Attestation and relevant EHC.

60. In addition, the OV may request that a supplier provide any other reasonable documentation as further evidence that the requirements have been met.

61. The OV may also choose to conduct an inspection (in person or virtual) of any supplier's premises (or at least one, in the case of multiple sites) to satisfy themself that any measures outlined in the documentation above have been sufficiently implemented.

62. If, in their professional judgment, the OV is **not** satisfied that:

    - the process is robust,
    - the process has been applied correctly, or
    - a supplier meets the requirements of the GEFS, Support Attestation or the relevant EHC on consideration of the evidence provided,

    then the OV must **not** issue the Support Attestation, either in its entirety or for the specific supplier as the circumstances dictate.

Assessment of the manufacturer

63. The OV must assess and record any requirements relating to the premises or processing that will be certified in the relevant EHC.

64. Suitable forms of evidence which the OV may check during this assessment may include:

    - SOPs, e.g. to define processes and responsibilities required for stable production of the products and verification of these processes
    - Relevant health, traceability and processing records
    - HACCP plans/records
    - contractual agreements
    - invoices

65. The OV must conduct a physical check of at least a representative sample of the products included to verify that:

    - their description matches that declared by the manufacturer;
    - they are fully packaged for the final consumer; and
    - any available identification marking on such products matches that declared in the Support Attestation.

Routine compliance visits

66. After the initial compliance visit, an OV must conduct in-person visits every three months as a minimum. Intervening visits may be conducted virtually if the OV issuing the Support Attestation is able to satisfy the RCVS Code with regards to remote certification.

67. Compliance visits do not need to be conducted by the same OV each time. However, an alternative OV may only conduct a virtual visit if they have conducted at least one in-person visit in the preceding eleven months and the requirements of paragraph 66 are still met.

Assessment of the manufacturer

68. During each compliance visit, the OV must assess and record any requirements relating to the premises or processing that will be certified in the EHC. See paragraph 64 for examples of forms of evidence.

69. During an in-person compliance visit, the OV must conduct a physical check of at least a representative sample of the products. See paragraph 65 for further details.

70. During a virtual compliance visit, the OV may view photographs of or join a video call to view a representative sample of the products to verify the points listed in paragraph 65.

Changes to the supply chain

71. If the manufacturer wishes to introduce a new supplier to their list of GEFS suppliers, they must demonstrate to the satisfaction of the OV that the onboarding process has been applied before the supplier is included in the next Support Attestation. Until then, the supplier must **not** be added to the next Support Attestation and goods produced using their POAO or ABP ingredients must **not** be exported using the GEFS.

72. To be satisfied that the requirements of the GEFS, the Support Attestation and the relevant EHC have been met, the OV must consider all relevant documentation. See paragraphs 58-60 for further details.

73. The OV may also choose to conduct an inspection (in person or virtual) of the new supplier's premises (or at least one, in the case of multiple sites) to satisfy themself that any measures outlined in the documentation provided have been sufficiently implemented.

74. The OV may take reasonable additional steps as they deem necessary in their professional judgment to satisfy themselves that the new supplier and the POAO or ABP ingredients provided meet the requirements of the GEFS, Support Attestation and the relevant EHC. If the OV is not satisfied, they must not include the supplier on the Support Attestation.

75. If the manufacturer makes any revisions to the onboarding process for suppliers, the OV must re-examine the process and be satisfied that it retains a reasonable level of due diligence. If the OV is not satisfied, they must **not** include any new suppliers on the Support Attestation that have been onboarded until the process is rectified.

Issuing the Support Attestation

76. To issue the Support Attestation, the OV must complete Part 2, known as the OV [or FCCO] Declaration. It comprises of two sections, as follows:

A. Compliance visit

77. The OV can only sign and issue the Support Attestation once all relevant evidence has been inspected and they are satisfied that the conditions of the scheme and the requirements of the relevant EHC that can be ascertained at the time of the compliance visit have been met.

78. Where one Support Attestation is issued to cover multiple sites, Part II.A.1 should be completed with a schedule detailing the dates of each compliance visit to each site.

79. Copies of evidence used to support the issue of the Support Attestation (electronic or hard copies) and, if used, any checklists completed must be kept for auditing purposes by the OV in line with other relevant retention policies and made available on request to COs responsible for certifying export consignments (e.g., through an electronic portal).

80. The date of issue is the date on which the OV is content that the requirements have been fully met, which may be after the date on which the compliance visit is conducted if the OV deems further information is required.

81. If, in their professional judgment, the OV is not satisfied that the requirements of the scheme and relevant EHC have been met, they **must not** issue the Support Attestation.

B. OV signature

82. The Support Attestation is an official document, and as such the OV must sign Part 2 in their official capacity as an Official Veterinarian, using their stamp.

83. The OV does not need to sign or stamp each individual page of the Support Attestation. However, where additional schedules are used (i.e., to provide further entries to the tables in Part 1.B.), each additional page should be signed, dated and stamped by the OV as verification that they form part of the Support Attestation.

Duration of the Support Attestation

84. The Support Attestation is time limited to 30 calendar days.

85. The 30-day duration begins on the day the Support Attestation is signed and covers products produced in the period up to and including the expiry date.

86. For continuity of coverage by the scheme, the manufacturer should ensure that another compliance visit takes place immediately and another Support Attestation is issued on the expiration of the previous Support Attestation's 30-day period. For example, if the Support Attestation was signed on 1 April, it would cover all products produced from that date until 30 April, and then another compliance visit and Support Attestation would be required on 1 May to ensure continuity of coverage.

87. Where public holidays or staff absence mean that the next compliance visit and Support Attestation cannot be arranged immediately after 30 days, the manufacturer should:

    - export products without use of the scheme for the duration not covered by a Support Attestation, until the compliance visit and new Support Attestation can be arranged; or

    - schedule the compliance visit and Support Attestation to take place before the expiry of the previous Support Attestation. This would end the previous Support Attestation and begin the new Support Attestation's 30-day period.

88. During the 30-day period covered by a Support Attestation, the manufacturer must immediately inform the exporter, the OV who signed the Support Attestation and, if the product has already been moved to the exporting premises, the veterinary practice, agency or company responsible for certifying the goods of any changes that affect the validity of the Support Attestation. The manufacturer must have a clear process in place (included within their Standard Operating Procedures) to ensure that such notification takes place without delay.

89. Where a Support Attestation requires amending during the 30-days covered (e.g., to correct an error), the OV who signed the Support Attestation must:

    - strike through the incorrect information;

    - insert the correct information; and

    - endorse the correction by adding their initials and stamp as close to the correction as possible without obscuring any text.

Batch Declaration and movement of products

90. Each and every delivery of products moved to the exporting premises during the 30-days covered by the Support Attestation must be accompanied by or electronically linked to:

- the relevant Support Attestation; and
- a commercial document known as a Batch Declaration.

91. The Support Attestation must cover the date on which the products were produced but may not necessarily cover the date on which they are moved to the exporting premises or exported.

92. The Batch Declaration must include the following information, specific to that consignment of products:

- the unique reference number (URN) of the Support Attestation covering the products
- approval numbers of establishments
- batch/lot numbers
- description of the products, including product identifiers
- gross weight
- net weight
- production/pack date

93. Where multiple 'EITHER/AND/OR' options are selected on the Support Attestation or where multiple suppliers supply the same POAO or ABP ingredient, the Batch Declaration must include the specific details for that product or batch.

Example

Support Attestation records multiple suppliers supplying the same ingredient:

POAO raw ingredient (e.g., dairy, honey)	**Establishment type** (e.g., slaughterhouse, processing plant)	**Approval / Registration Number** (if available)
Eggs	*Processing Plant*	*GB 001*
Eggs	*Processing Plant*	*GB 002*

Support Attestation records multiple EITHER/AND/OR options:

*[EGG PRODUCTS

27. *[If relevant, the egg products have been subject to one or more (if multiple products or ingredients) of the risk mitigation treatments for highly pathogenic avian influenza specified below:

EITHER	~~*[liquid egg white treated with 55.6°C for 870 seconds;]~~
AND/OR	*[liquid egg white treated with 56.7°C for 232 seconds;]
AND/OR	~~*[10% salted yolk treated with 62.2°C for 138 seconds;]~~
AND/OR	*[dried egg white treated with 67°C for 20 hours;]

Batch Declaration states per product per batch:

- Which supplier was used, and
- Which EITHER/AND/OR option applies

Product	Supplier(s)	Risk Mitigation Treatment
Egg patty 30g	*GB 001*	*Liquid egg white treated with 56.7°C for 232 seconds*
RTE omelette 100g	*GB 002*	*Dried egg white treated with 67°C for 20 hours*

94. The Batch Declaration may include other relevant information as agreed between the exporter, manufacturer, OV issuing the Support Attestation and CO.

95. The Batch Declaration must also include the following statement:

    For POAO goods (SA1 and SA3)

    "The evidence required to facilitate export of the products in this consignment has been provided in Support Attestation *[insert URN of relevant Support Attestation]*. No changes have been made that affect the validity of the information provided in this Support Attestation, and the provisions of Regulation (EC) 853/2004 and Regulation (EU) 2017/625 have been applied continuously."

    For ABP goods (SA2)

    "The evidence required to facilitate export of the products in this consignment has been provided in Support Attestation *[insert URN of relevant Support Attestation]*. No changes have been made that affect the validity of the information provided in this Support Attestation, and the provisions of Regulation (EC) 1069/2009 and Regulation (EU) 142/2011 have been applied continuously."

96. The Batch Declaration must be signed on the day the products are moved to the exporting premises, and in all cases before the products are presented to the

Certifying Officer for certification, by an individual who has both sufficient knowledge of and responsibility for the relevant parts of the production, transport, and storage processes and who has been authorised in writing by the Managing Director (or equivalent) of the manufacturer.

97. A template letter is included in Annex IV for manufacturers to provide this authorisation.

98. One Batch Declaration should be issued for the entire batch produced, intended for export, even if that batch is transported using multiple loads. A new Batch Declaration does not need to be produced per load.

99. Where the batches intended for export are not known at the time of production (e.g., they are selected for export later at a storage depot), manufacturers must issue the Batch Declaration at an appropriate point in their own processes that ensures, when the goods are selected for export, the required information can be entered on the declaration. This is typically done when a batch is produced, but if record-keeping systems are in place that mean this information is recorded contemporaneously and can be retrieved at a later date, the Batch Declaration could be issued once the goods are selected for export at the storage depot.

100. Failure to provide the Batch Declaration, or providing inaccurate Batch Declarations, will result in products being ineligible for export. It will also be considered a major non-compliance with the scheme's conditions, which may result in removal from the GEFS, and should be escalated by the OV to the exporter or Defra. See paragraphs 141-147 for further details.

Certification

101. An original version of the Support Attestation must be supplied to the CO at the exporting premises. This must either be supplied:

- Electronically in any file type, directly from the OV signing it in such a way that document tampering by a third party is not possible (e.g., through direct email to the OV or their practice or via an IT system that the OV deems sufficiently secure); or

- as a paper copy, in which case this must be the original signed document (signed in a colour other than black) and must be 'fan stamped' by the OV to guard against tampering.

102. Use of the scheme does not remove or change the requirement for each consignment of products exported to be accompanied by its own EHC.

103. EHCs are consignment-specific documents, meaning that consignment-specific details must be provided to the CO using a Batch Declaration in addition to the Support Attestation.

104. In determining whether to issue the EHC, the CO will review a range of evidence as required by the EHC and accompanying notes for guidance, including the Support Attestation and Batch Declaration among others.

105. COs should undertake sufficient checks to ensure the accuracy and validity of the Support Attestations provided under the GEFS. These checks may include, but are not limited to:

- physical checks of the products
- physical inspection of the manufacturing site/processing
- random and risk-based spot checks to verify the authenticity of the information provided.

106. Where evidence suggests that a supplier of POAO or ABP to the manufacturer presents an increased risk, inspections of the exported products must be more frequent. Examples of increased risk may include:

- evidence of minor inaccuracies within the attestations
- supply of products considered to pose an increased risk to public or animal health

107. Where the CO identifies minor irregularities or non-compliance within a Support Attestation, they must report this to the exporter and OV who issued the relevant Support Attestation. The inaccurate attestations **must not** be accepted until they have been corrected.

108. An example of a minor irregularity or non-compliance is a minor documentary error, such as a transposition error.

109. Where the CO identifies major irregularities or non-compliance or repeated minor irregularities or non-compliance within a Support Attestation, they must report this to APHA at GEFSteam@apha.gov.uk.

110. Examples of major irregularities or non-compliance may include:

- evidence of deliberate deception or falsification of supporting documentation
- the manufacturer’s failure to immediately inform the CO’s veterinary practice, agency or company of any changes that affect the validity of a Support Attestation

111. Where there is evidence of major irregularities or non-compliance or repeated minor irregularities or non-compliance within Support Attestations, Support Attestations from that manufacturer **must no longer** be accepted as reliable evidence by the CO for the issuance of EHCs. Future Support Attestations provided by that manufacturer may only be accepted for certification purposes

where the CO is fully satisfied that they are accurate. This may involve conducting physical inspection of the manufacturer's premises or obtaining relevant traceability information specific to that consignment by another OV.

112. If, in their professional judgment, the CO is not satisfied that the requirements of the scheme and relevant EHC have been met, they **must not** issue the EHC.

113. The Support Attestation does not need to accompany the EHC or consignment when it is exported.

Membership of the GEFS

114. The GEFS is a membership-based scheme and exporters must apply to APHA and receive approval before using it to facilitate their exports.

Who can join the scheme?

115. Membership of the GEFS is open to exporters who meet the following criteria:

- are based in Great Britain
- are listed as the exporter on the EHCs of their products
- keep a documented list of manufacturers from whom they source all products they intended to export under the GEFS

116. Membership covers only the exports of the legal entity listed. Subsidiaries and other affiliated but separate companies must apply for their own GEFS membership.

117. Manufacturers who supply products to exporters cannot join the GEFS. If they wish to use Support Attestations, they must advise their exporters to join the scheme.

118. Third-party companies that act on behalf of the exporter to manage the logistics of exporting products (e.g., agents, hauliers) are not eligible to join the GEFS. The exporter as listed on the EHC must be a member of the scheme.

Joining the scheme

119. To join the GEFS, exporters must fully complete the application form available on GOV.UK and email it to GEFSteam@apha.gov.uk.

120. As part of their application, exporters must submit their list of manufacturers on the template provided, which must include:

- the address from which the products are procured or delivered and approval/registration number for each manufacturer
- sufficient detail to identify the products supplied by each manufacturer (e.g., full product name)
- the date since which each manufacturer has been providing the products to the exporter

- confirmation that products are fully packaged for the final consumer by the manufacturer

121. The exporter must ensure the list of manufacturers provided to APHA during their initial application is kept up-to-date at all times and must contact APHA whenever manufacturers need to be added or removed.

122. All approved members are listed on the GEFS members list (ET200).

Ongoing monitoring through the auditing process

123. All members are subject to an audit process, which ensures they are complying with the scheme's terms and conditions as laid out in this guidance. The audit process is a data-driven, intelligence-led process, focused on documentary evidence from members, and may occur at any time without warning.

124. All new members to the scheme will receive an audit within the first 6 months of joining.

125. Routine audits are performed at a rate of one per month per every 24 members (rounded down). Members will be selected for audit at random from the list of eligible members.

126. Members will never go more than two years without an audit.

127. During an audit, up to 10 EHCs requested by the member under the GEFS from the preceding three months as recorded on EHCO will be selected for review. The member will be asked to provide evidence demonstrating that they have met the requirements of the scheme for those EHCs within 8 working days. The evidence required will include, but is not limited to:

    - the EHCs
    - the Support Attestations used to issue the EHCs
    - evidence of the compliance visits conducted before issue of the Support Attestations (see paragraph 55 for examples)
    - the Batch Declarations for the products exported

128. An audit will also include confirmation that the manufacturer list held by APHA is still correct.

129. The member will be provided with the overall audit deadline, which will be no less than 10 working days after the evidence deadline, at which time they will receive their audit outcome. Any outstanding questions on the evidence provided must be clarified within this timeframe.

130. An audit may have one of two outcomes:

    - Pass: The evidence provided demonstrates compliance with the scheme's conditions and the member is not audited again for at least twelve months (unless suspected non-compliance is reported).

    - Further Investigation Needed**:** There is evidence of potential non-compliance and further information or documentation is required. See paragraphs 142-147 further details.

131. Failure to respond to an audit request or to provide requested information and/or documentation without reasonable cause will result in immediate expulsion from the scheme.

132. Members must share the outcomes of their audits with their COs, manufacturers and OVs issuing Support Attestations, and in particular any remedial actions required.

133. Where appropriate, recommendations will be made from audit findings to improve the scheme and this guidance. A record of audit findings and outcomes will be shared in a yearly summary of the scheme with the Animal Disease Policy Group[8].

134. The issuance of Support Attestations and EHCs by OVs will be audited by the APHA Quality Assurance team as part of their standard quality assurance measures for OV activities.

Removal from the scheme

135. APHA reserves the right to remove an exporter's approval to operate under this scheme on the following grounds:

Lapse of membership

136. An exporter's membership of the GEFS will be deemed to have "lapsed" if they no longer make use of the scheme.

137. If the member does not request any EHCs using the GEFS for five months, they will be contacted via email to confirm whether their membership is still required.

138. If the member confirms their intention to make imminent use of the scheme (i.e., within the following two months), they will retain their membership.

[8] The Animal Disease Policy Group (ADPG) in the UK provides strategic recommendations and policy advice on animal disease control. This group, which includes representation from Defra, Devolved Governments, Food Standards Agency (FSA), Food Standards Scotland (FSS) and the Animal and Plant Health Agency (APHA), plays a crucial role in advising government ministers.

139. Their membership of the GEFS will be removed if the member:

- does not respond and does not request any EHCs using the scheme within the following 30 days;
- receives the two-month extension but does not request any EHCs under the scheme in that time; or
- responds to confirm their membership is no longer required.

140. If a lapsed member wishes to rejoin the scheme, they may do so by completing the standard application.

Expulsion for non-compliance

141. A member may be expelled from the scheme where there is evidence of significant and/or repeated breaches of the scheme's requirements. This evidence may be discovered during an audit, ongoing conversations with the exporter, manufacturer, OV or CO, or as a result of whistleblowing.

142. Where non-compliance is suspected, the member will be informed by email and subject to an investigation by APHA. During this time, the member may continue to make use of the scheme.

143. An investigation may include, but is not limited to:

- requests for further information and/or documentation
- interviews with the exporter, manufacturer, certifier and/or other relevant parties
- physical examination of premises

144. Failure to respond to an investigation or to provide requested information and/or documentation without reasonable cause will result in immediate expulsion from the scheme.

145. If non-compliance is discovered, its severity will be assessed by considering:

- the number of times it has occurred
- the extent of non-compliance
- the risk posed, and any potential or actual harm
- any evidence of deliberate action, dishonesty or neglect

146. An investigation may have one of three outcomes:

- Satisfactory: There is no evidence of non-compliance. The member retains their membership of the scheme and is not audited again for at least twelve months (unless suspected non-compliance is reported).

- Improvement required**:** There is evidence of minor non-compliance. The member is issued an improvement notice outlining the necessary improvements required to retain membership of the scheme and must provide evidence of appropriate remedial action; the member is then subject to an audit within 6 months to confirm these improvements have been made.

- Unsatisfactory**:** There is evidence of a severe and/or repeated non-compliance; failure to improve after receiving an improvement notice; or failure to meet investigation requests without reasonable cause, and the member is expelled from the scheme with immediate effect.

147. Members must share the outcome of their investigation with their COs, manufacturers and OVs issuing Support Attestations.

148. Where a member is dissatisfied with the outcome of an investigation, they may appeal in writing to GEFSteam@apha.gov.uk within 14 days of receiving the investigation outcome. The member must set out the grounds for appeal and whether they are appealing against:

    - procedural errors; and/or

    - the decision, including any new information/evidence that has been raised that may change the outcome of the original decision.

    Appeals are assessed by someone senior to the person who conducted the investigation (the “appeal manager”). The appeal manager may, on consideration of the evidence, uphold the original investigation outcome or issue a different outcome. The appeal manager’s decision is final.

149. An expelled member may apply to rejoin the scheme at APHA’s discretion after three months, on the basis of providing evidence to APHA of remedial action taken to guarantee compliance with the scheme’s conditions. Their application will be subject to enhanced scrutiny and the member will receive more frequent audits in their first 18 months of membership.

Summary of roles and responsibilities

150. The requirements of the GEFS can only be met if all parties understand their role in the process and how they must work together with others involved. The guidance below summarises the responsibilities of each party.

151. Failure to meet responsibilities may be identified during an audit, ongoing conversations with the exporter, manufacturer, OV or CO, or as a result of whistleblowing.

The exporter (GEFS member)

152. The exporter must apply and receive membership of the GEFS from APHA before using its provisions.

153. The exporter must maintain accurate records of their manufacturers using Support Attestations, including:

- the registered address and approval/registration number for each manufacturer
- the address from which the products are procured or delivered (if different from the registered address)
- sufficient details of the products from each manufacturer
- the date since which each manufacturer has been providing the products to the exporter
- confirmation that products are fully packaged for the final consumer by the manufacturer

154. The exporter must inform APHA of any changes to the manufacturer list provided during their initial application as soon as possible, including the addition or removal of manufacturers operating under the scheme.

155. The exporter must ensure that their manufacturer list is available on request by the CO and APHA.

156. The exporter must ensure their manufacturers understand the terms of the GEFS and must be satisfied that they have relevant SOPs in place to ensure compliance with the scheme's requirements.

157. Where products have already been moved to the exporting premises for certification, the exporter must contact the veterinary practice, agency or company responsible for certifying the goods immediately if they are notified by a

manufacturer that there is a change affecting the validity of their Support Attestation.

158. The exporter must accurately record on EHCO any EHCs requested using the GEFS by ticking the checkbox in answer to the question “'Will this consignment be part of the Groupage Exports Facilitation Scheme (GEFS)?” in the “Information needed by APHA” section under the heading "Groupage Export Facilitation Scheme". Where a batch of EHCs are requested which will include exports under the GEFS and outside the GEFS, the checkbox should still be ticked.

159. The exporter must respond to all communications by APHA where requested, including audit requests, by the deadline stated.

160. The exporter must share the outcome of any audit or investigation with their COs, manufacturers and OVs issuing Support Attestations.

161. **Failure to meet these responsibilities** may result in expulsion from the scheme. See paragraphs 141-147 for further details.

The manufacturer

162. The manufacture must apply a robust and documented onboarding process to all suppliers of POAO or ABP ingredients. See paragraphs 57-58 for further details.

163. Before issuing a Support Attestation, the manufacturer must discuss and agree with the OV what evidence must be provided to satisfy them that the requirements of the Support Attestation and relevant EHCs are met.

164. The manufacturer must arrange and facilitate access by the OV to the manufacturer’s establishments, relevant records, and inspection locations, for the purposes of conducting compliance visits and maintain records of the visits taking place.

165. The manufacturer must ensure that the Manufacturer Declaration of the Support Attestation (Part 1) is signed on their behalf by an individual with sufficient knowledge on the establishments and processes and with the responsibility and authority (obtained in writing from the Managing Director or equivalent) to sign on behalf of the manufacturer.

166. The manufacturer must discuss in advance with the CO what batch-specific information must be captured in the Batch Declaration (with reference to the relevant EHCs).

167. The manufacturer must send a Batch Declaration with each and every batch of products moved to the exporting premises during the duration of validity of the Support Attestation, signed by an individual who has both sufficient knowledge of and responsibility for the relevant parts of the production, transport, and storage

processes and who has been authorised in writing by the Managing Director (or equivalent) of the manufacturer.

168. The manufacturer must immediately inform the exporter, the OV who signed the Support Attestation and, if the product has already been moved to the exporting premises for certification, the veterinary practice, agency or company responsible for certifying the goods of any changes which affect the validity of the declarations provided in the Support Attestation.

169. The manufacturer must allow the CO to enter the manufacturing premises when they deem it necessary to check the accuracy or validity of the Support Attestation before issuing the EHC.

170. **Failure to meet these responsibilities** may result in one or more of the following:

- The CO no longer accepting Support Attestations from the manufacturer for the purposes of certification, and the manufacturer no longer being able to benefit from the GEFS provisions.
- The exporter being expelled from the scheme for non-compliance.
- Prosecution for fraud, where it is appropriate.

The OV issuing the Support Attestation

171. The OV must conduct a compliance visit to the manufacturer before issuing the Support Attestation. This visit must ensure that all requirements outlined in Part 2 of the Support Attestation are met.

172. The OV must conduct a compliance visit in-person at least once every three months. Intervening visits may be conducted virtually if the OV issuing the Support Attestation has conducted at least one in-person visit and is able to satisfy the RCVS Code with regards to remote certification.

173. The OV must only issue the Support Attestation if they are satisfied that the conditions of the scheme and the requirements of the relevant EHC that can be ascertained at the time of the compliance visit have been met. Where appropriate, they may alert the relevant competent authority to instances of serious non-compliance with public health requirements.

174. The OV must check the GEFS members list (ET200) to ensure the exporter, as listed on the Support Attestation, is a current member of the scheme before issuing the Support Attestation.

175. If the OV is informed by the manufacturer of any changes affecting the validity of the declarations provided in the Support Attestation and the products have already been moved to the exporting premises for certification, they must immediately

inform the veterinary practice, agency or company responsible for certifying the goods of these changes.

176. **Failure to meet these responsibilities** may result in one or more of the following:

- The member being expelled from the scheme for non-compliance.
- Investigation by the APHA Quality Assurance team as part of their oversight of OV activities.

The CO issuing the EHC

177. The CO must ensure that the exporter, as listed on the EHC, is listed on the GEFS members list (ET200) before accepting the Support Attestation as evidence for certification.

178. The CO must check that the EHC has been requested using the GEFS on EHCO by the exporter and provide feedback to the exporter as necessary. Accidental errors should not impact on the use of Support Attestations for export, but repeated failures to record the use of the GEFS on EHCO may be viewed as non-compliance with the scheme's requirements and should be reported to APHA at GEFSteam@apha.gov.uk.

179. In all cases, the CO must conduct a documentary check for each consignment covered by the EHC. This includes use of:

- Support Attestations
- Batch Declarations
- personal knowledge of the consignment where appropriate
- other commercial documents as appropriate

180. The CO must retain evidence for each manufacturer to support the GEFS audit process in line with APHA guidance on the retention of documents used to certify consignments for export.

181. Where the CO identifies minor irregularities or non-compliance within a Support Attestation, they must report this to the exporter and OV who issued the relevant Support Attestation. See paragraphs 107-108 for further details.

182. Where the CO identifies major irregularities or non-compliance within a Support Attestation, they must report this to APHA at GEFSteam@apha.gov.uk. See paragraphs 109-110 for more details.

183. Where there is evidence of major irregularities or repeated minor irregularities within an attestation, the CO must no longer accept Support Attestations from the

manufacturer as reliable evidence for the issuance of an EHC. See paragraph 111 for further details.

184. **Failure to meet these responsibilities** may result in one or more of the following:

- The member being expelled from the scheme for non-compliance.
- Investigation by the APHA Quality Assurance team as part of their oversight of OV activities.

Conflicts of Interest

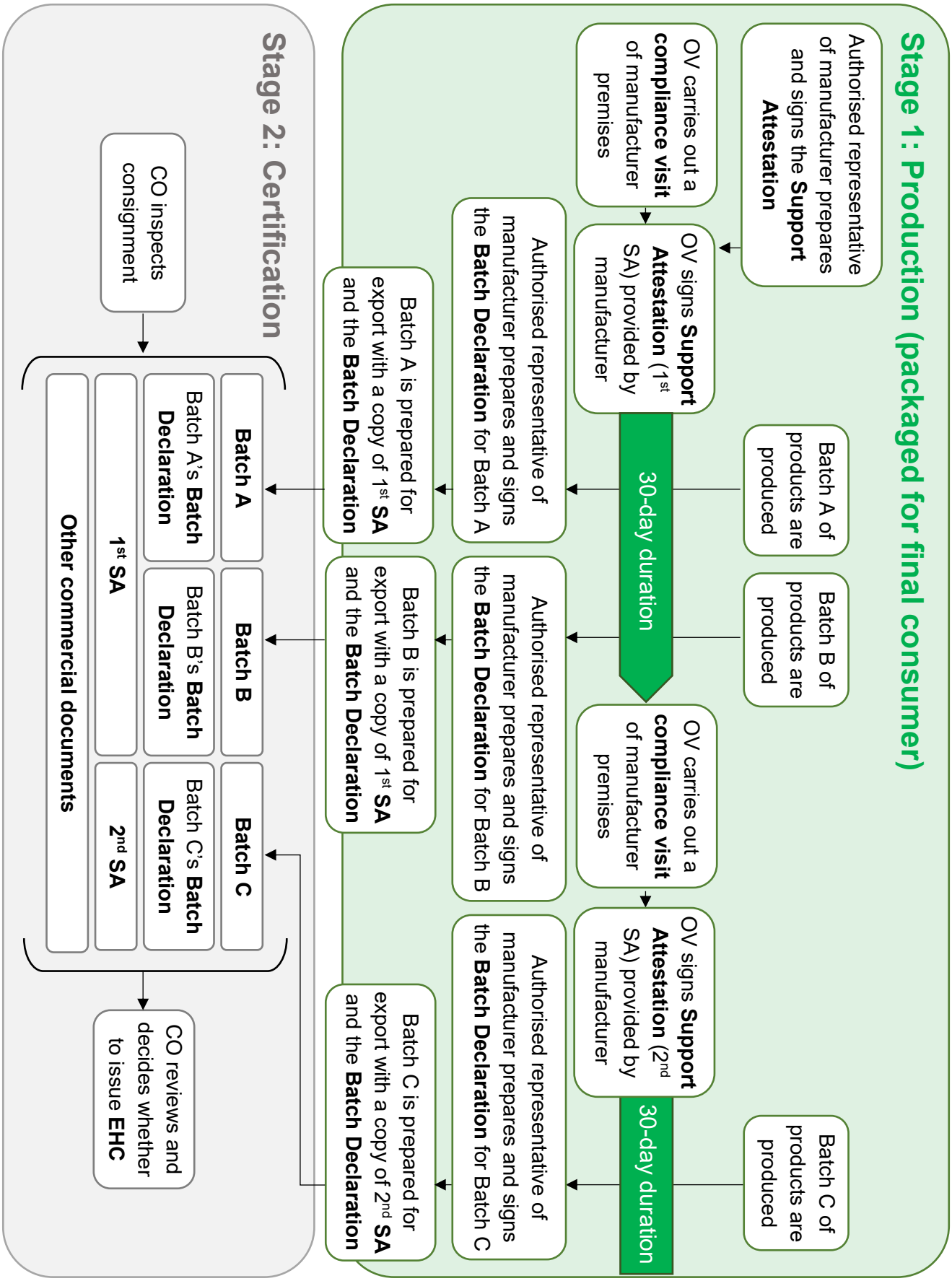
185. This guidance does not define or prescribe any contractual arrangements between OVs, exporters or manufacturers. However, reference should be made to the relevant competent authority guidance and professional codes of conduct that define conflicts of interest, to ensure that attestations remain impartial.

186. OVs must consider and abide by the principles contained in the RCVS principles of certification relating to conflict of interest including that:

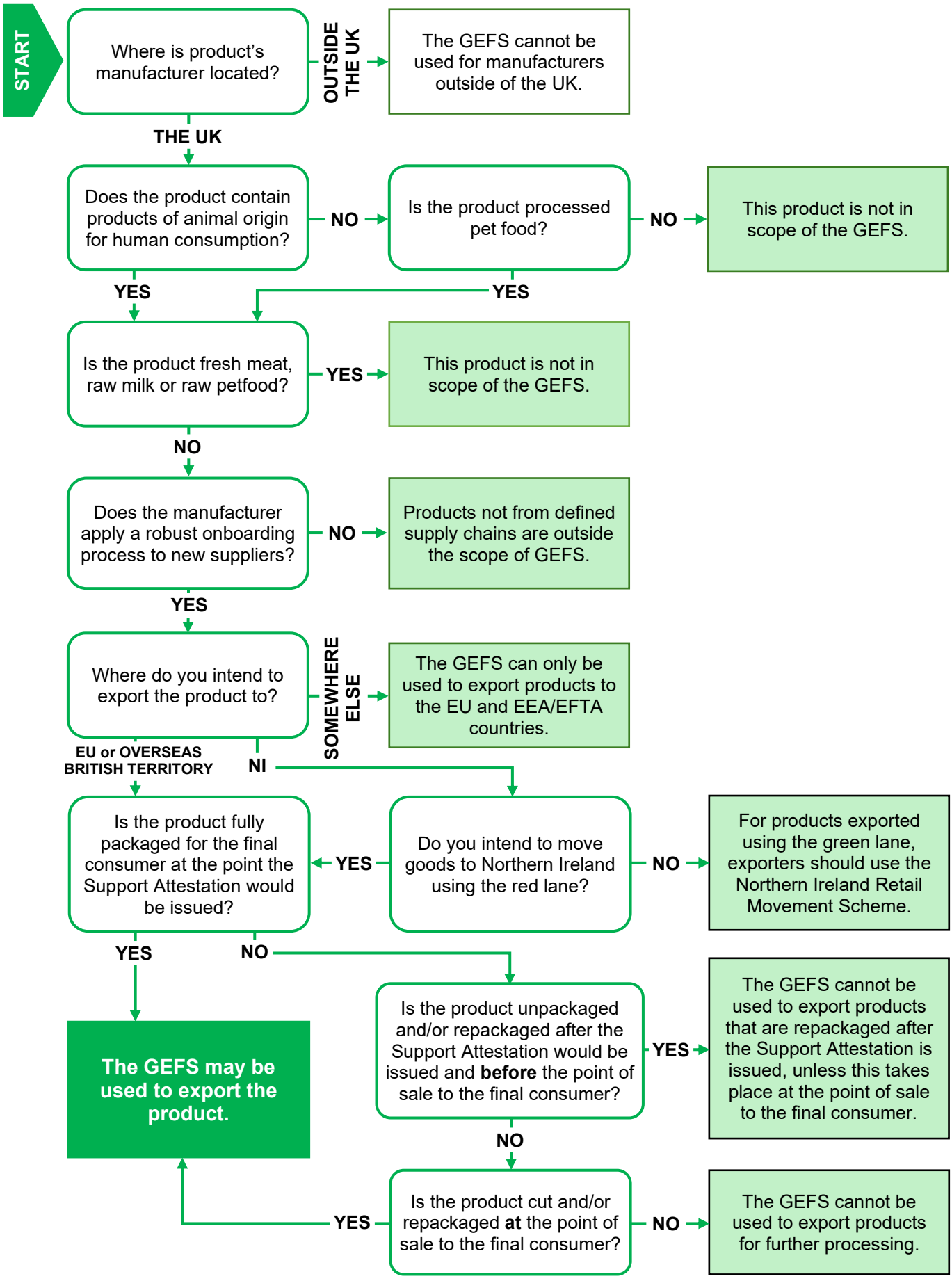
- they must not allow commercial, financial, or other pressures to compromise their impartiality; and
- they must not certify where they own, or part own either a business producing a commodity for export or the commodity to be exported or are a salaried employee of the business.

187. FCCOs should be aware of their obligations under the WOAH relating to conflict of interest.

Annex I: Diagram of example GEFS operation



Annex II: Decision tree for using GEFS



Annex III: EHCs covered by the GEFS

EHC8305 Processed pet food other than canned pet food to, or transit through, the European Union and Northern Ireland

EHC8324 Canned pet food to, or transit through, the European Union and Northern Ireland

EHC8325 Dog chews to the European Union and Northern Ireland

EHC8350 Composite food products intended for human consumption to the European Union and Northern Ireland post 21 April 2021

EHC8351 Composite food products intended for human consumption for transit through, or storage in the European Union or Northern Ireland

EHC8358 Colostrum based products of cows, ewes, goats, buffaloes and dromadaries for human consumption to the European Union and Northern Ireland

EHC8359 Eggs for human consumption to the European Union and Northern Ireland

EHC8360 Egg products to the European Union and Northern Ireland

EHC8361 Live fish, crustaceans, certain fishery products (i.e. Cephalopods) and products from these animals intended for human consumption to the European Union and Northern Ireland: certificate

EHC8362 Fishery products caught by vessels flying the flag of an EU member state or Northern Ireland and transferred in third countries with or without storage

EHC8364 Live bivalve molluscs, echinoderms, tunicates, marine gastropods and products from these animals intended for human consumption to the European Union and Northern Ireland: certificate

EHC8382 Mechanically separated porcine meat to the European Union and Northern Ireland post 21 April 2021

EHC8383 Meat preparations intended for human consumption to the European Union and Northern Ireland

EHC8384 Meat products intended for human consumption, including rendered animal fats and greaves, meat extracts and treated stomachs, bladders and intestines (other than casings), that are not required to undergo a specific risk-mitigating treatment to the European Union and Northern Ireland

EHC8385 Meat products intended for human consumption, including rendered animal fats and greaves, meat extracts and treated stomachs, bladders

and intestines (other than casings), required to undergo a specific risk-mitigating treatment to the European Union and Northern Ireland

EHC8390 Gelatine intended for human consumption to the European Union and Northern Ireland

EHC8391 Honey and other apiculture products intended for human consumption to the European Union and Northern Ireland

EHC8392 Other products of animal origin derived from domestic ungulates, poultry, rabbits or fishery products intended for human consumption not covered by articles 8 to 26 of commission implementing regulation (EU) 2020/2235 to the European Union and Northern Ireland

EHC8393 Animal casings intended for human consumption to the European Union and Northern Ireland

EHC8394 Chilled, frozen or prepared frogs' legs intended for human consumption to the European Union and Northern Ireland

EHC8395 Snails intended for human consumption to the European Union and Northern Ireland

EHC8396 Collagen intended for human consumption to the European Union and Northern Ireland

EHC8399 Highly refined chondroitin sulphate, hyaluronic acid, other hydrolysed cartilage products, chitosan, glucosamine, rennet, isinglass and amino acids intended for human consumption to the European Union and Northern Ireland

EHC8400 Insects intended for human consumption to the European Union and Northern Ireland

EHC8467 Dairy products intended for human consumption made from raw milk or that are not required to undergo a specific risk-mitigating treatment to the European Union and Northern Ireland

EHC8468 Dairy products intended for human consumption that are required to undergo a pasteurisation treatment to the European Union and Northern Ireland

Annex IV: Manufacturer authorisation template

[COMPANY HEADED PAPER]

[Name of company]

[Address of company]

Date: *[date]*

To whom it may concern

I, …….. (*full name*), being …….. (*official position in the company*) of …… (*name of manufacturer*) authorise the following people to provide declarations on behalf of the company as required under the Groupage Export Facilitation Scheme (GEFS):

NAME	SIGNATURE	JOB TITLE

I confirm that the people above have the knowledge of and responsibility for the manufacturing processes and as a signatory are aware that making a false declaration is an offence.

Yours faithfully,

(Signature)

(Name)

(Official position in the company, i.e., Managing Director or equivalent)