No: .....

EXPORT OF LIVE AQUATIC ANIMALS FOR HUMAN CONSUMPTION TO THE PEOPLE'S REPUBLIC OF CHINA – 8962EHC

NOTES FOR THE GUIDANCE OF AUTHORISED INSPECTORS AND EXPORTERS

1. ******IMPORTANT**** GENERAL PROCEDURES**

These notes provide guidance for certifying OVs and FCCOs – hereafter, jointly referred to as Authorised Inspectors.

This NFG must not be read as a standalone document but in conjunction with export health certificate 8962EHC. Exporters are strongly advised to obtain full details of the import requirements from importers in China, or their representatives in the UK, in advance of each consignment.
Completion of export health certificate 8962EHC can be carried out at the place of production/processing or at another place, such as at the airport/port of export from the UK.

Production establishments must be UK establishments approved under Regulation (EC) 853/2004 to handle fresh or wild caught or aqua cultured live aquatic animals, [and can include factory vessels approved by a UK Authority].

SPECIFICALLY, AND ONLY WITH REFERENCE TO CRABS:
Crabs for export to China **must only be sourced from** catch areas which do not exceed the fail/tolerance limit for cadmium; these areas are agreed and decided by DEFRA.
The exporter must provide evidence of this to the Authorised Inspector (see paragraph 10.1 for more information on this).

Exporters should seek membership of the SAGB Crab Monitoring Group via the link below:

Membership - The Shellfish Association of Great Britain

This will enable access to the SAGB Test Result Database.

Defra will use membership of and the results of the SAGB Crab Monitoring Group to facilitate establishment approval with GACC.

Exporters who are not part of the SAGB Crab Monitoring Group will be required to carry out heavy metal testing including cadmium testing at their own expense and they will need to show the certifying official the results as evidence that they fall within tolerance parameters.

REGISTRATION WITH GACC
Exporters, their agents, and their consignees, should note that they must be registered with the General Administration of Customs China (GACC) before any exports take place.
Exporters, their agents and their consignees may check the status of their approval by GACC at the link to the Quarantine Registration List.

Confirmation of 'Registration status' will be reflected as "Normal" for all relevant establishments.

Further details of the process may be obtained from the Centre for International Trade at exports@apha.gov.uk.

Exporters should note that it is their responsibility to ensure that they have not only applied but have been listed as approved to export by GACC prior to doing so. Exports carried out before approval by GACC is confirmed are likely to be stopped by Chinese Customs and destroyed.

2. **SCOPE OF THE CERTIFICATE**

Export health certificate 8962EHC must be used for the export of live aquatic animals for human consumption to The People's Republic of China only.

8962EHC can be used for the export of live aquatic animals, including live fish for human consumption; however, 8962EHC must **NOT** be used for the export of live aquatic animals for propagation.

For the export of dead/non-live fishery products for human consumption, use 7208EHC.

For the purposes of 8962EHC:

'*Live aquatic animals and their products*' means all wild caught or farmed aqua-cultured seawater and freshwater animals including live echinoderms, live tunicates and live marine gastropods; this includes all edible live forms and live products of such animals. In addition, this includes amphibian spp. whether wild or farmed and includes all edible live products of such animals.

'*Fresh live aquatic animal products*' are defined as products such as spawn or live eggs.

The meaning of '*Live aquatic animals*' and '*Live aquatic animal products*' **excludes** all aquatic mammals and aquatic reptiles, and all edible forms and products of such animals, whether wild caught or farmed.

The meaning of all '*wild caught*' seawater and fresh live aquatic animals and live aquatic animal products **includes** those animals and products caught in UK **or** other waters.

The meaning of '*farmed*'/ '*aqua-cultured*' seawater and fresh water live aquatic animals and live aquatic animal products **excludes** all edible live forms and live products of such animals which are **not** farmed or aqua cultured in the UK.

3. **CERTIFICATION BY AN AUTHORISED INSPECTOR**

8962EHC must be signed by an Authorised Inspector namely, a Food Competent Certifying Officer (FCCO) (that can be an Environmental Health Officer or a Food Safety Officer) or an Official Veterinarian (OV), designated by the APHA on behalf of the Department for Environment, Food and Rural Affairs, the Scottish Government or the Welsh Government. OVs must hold the Official Controls Qualification (Veterinary) Products (OCQ(V)PX) authorisation.

In NI, a Veterinary Certifying Officer or FCCO, appointed or designated, respectively, by the Department of Agriculture, Environment and Rural Affairs, Northern Ireland (DAERA) may issue this certificate.

COs should sign and stamp the health certificate with their official personal stamp in any colour **OTHER THAN** that in which the certificate is printed, using a permanent ink.

In GB, a copy (paper or electronic; must be legible) of the completed

certificate and any supporting documentation, must be kept for the minimum required time (usually three years) and may be requested for audit and other purposes.

In NI, copies of certificates are stored on the official database.

See also, paragraph 4 relating to the provision of specimen stamps to China.

4. ELIGIBILITY OF FARMS/ESTABLISHMENTS/AQUACULTURE FARMS FOR EXPORT

Note: 'Farmed' / 'aqua cultured' seawater and freshwater live aquatic animals and live aquatic animal products of such animals which are not farmed or aquacultured in the UK **cannot** be exported using 8962EHC.

Paragraph II. of 8962EHC refers:

Establishments wishing to export live aquatic animals and live aquatic animal products to China must be listed by China as approved premises. Establishments involved in the export chain, including aquaculture farms, packaging plants and, where applicable, fishing vessels, must be approved or controlled by the relevant UK competent authority and registered with GACC before export. Edible aquatic animals from establishments that are not registered with GACC are not eligible for export to China under 8962EHC.

The Chinese authorities will expect that the details of the establishments entered onto the certificate are both correct, consistent and in accordance with their own records of approved establishments. Approval codes, and other details, should exactly match the details as listed on the China GACC veterinary authorities' website.

Pre-Registration of Authorised Inspectors with China

Specimen copies of the official stamps and signatures of Authorised Inspectors carrying out the export certification must be provided to China before exports take place.

The details of the premises and the Authorised Inspector's stamps & signatures to be provided must be submitted to APHA Carlisle or DAERA:

APHA Centre for International Trade (CIT)
Eden Bridge House,
Lowther Street,
Carlisle,
CA3 8DX
Tel. 03000 200301
E-mail: LiveAnimalExports.Carlisle@APHA.gsi.gov.uk

DAERA Tel. 028 77442 060
DAERA VS Implementation: vs.implementation@daera-ni.gov.uk

The exporter or Authorised Inspector must submit, a table providing full plant details, including name, address, post code and registration number, as well as a specimen copy/ies of the stamp(s) of the Authorised Inspector's Local Authority.

It is important that specimen copies are provided of all different stamps that may be used. The information provided must be typed and clear.

The specimen stamps must be fully legible and not smudged.

Any numbers or characters in the stamps must be unambiguous – for example a '3' must not be a possible '8'.

The specimen stamps must be in any colour other than black.

It is further advised that Authorised Inspectors consistently render their name on the EHC in exactly the same format as submitted to GACC and use stamp ink of the same colour as in the submission to GACC.

It is the responsibility of the exporter to ensure that the name, address and registration number of the premises are correct in every detail.
The exporter must note that it is important that all the details are consistent with all information of name and address, etc. that will be used on labelling and other paperwork. Discrepancies may cause consignments to be delayed in China or rejected by the Chinese authorities.

Exporters should discuss with Authorised Inspectors how the completed form with electronic copies of stamps will be sent to APHA/DAERA. The Authorised Inspector may wish to send the form to APHA/DAERA themselves to ensure control of the use of their stamps.

It is the responsibility of the exporter to ensure that the completed form has been sent to APHA/DAERA.

APHA and DAERA will send the information on to DEFRA for onward transmission to be registered by the central authority (GACC) in China.

The list maintained in China is based on information provided to China by DEFRA.

At present, if additional registrations are necessary, transmission of information to China will be made every three months.
Several weeks must be allowed for the information to be received in China and to be sent on to the portal offices of the local authorities in China (China's entry-exit inspection and quarantine administration (CIQ)).

Exporters must note that this process may be subject to delay and that DEFRA cannot guarantee how long registration/approval will take, since it is an internal matter for the Chinese authorities.

The exporter should ask their importer in China to check with the local CIQ office to ensure that the relevant details have been received. It is the responsibility of the exporter to ensure that this has occurred **before** exports take place.

Authorised Inspectors and exporters must note that exports may be at risk if exports commence before China has registered the details of the exporter, the Authorised Inspector, and the AI's specimen stamp & signature.

Farms/establishments wishing to be approved for export to China must be in full compliance with UK hygiene rules. Farms / establishments which are not in compliance with UK hygiene rules must not export. It is the responsibility of the producer, exporter and Authorised Inspector to check on this, and it is the responsibility of the Authorised Inspector to refuse to provide export certification if necessary.

Farms/establishments wishing to be approved for export to China must also be in full compliance with Chinese hygiene regulations. Farms / establishments which are not in compliance with Chinese regulations must not export. It is the particular responsibility of the producer to check on this, and it is the responsibility of the Authorised Inspector to ensure that the producer is aware of this requirement.

IN ADDITION
WITH RESPECT TO THE LEVEL OF CADMIUM IN THE CRABS,

The producer and exporter must ensure that the crabs are sourced from catch areas that are considered by DEFRA as areas that do not exceed the fail/tolerance limit for cadmium and can be used for export of crabs to China .

5. GENERAL CONSIDERATIONS RELATING TO COMPLETION OF THE CERTIFICATE

HANDWRITTEN OR ALTERED VERSIONS OF 8962EHC ARE INVALID.
Any insertions must be typed. The only permitted handwritten entry is the signature of the Authorised Inspector. If necessary, the final date of certification can be entered using an inked rubber stamp in any ink colour **OTHER THAN BLACK.**

The Certificate must be signed and stamped with the Authorised Inspector's stamp in any colour **OTHER THAN BLACK** (it is advised that this be the same colour as that registered with China).

Any authorised deletions that cannot be entered electronically, or typed, 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.

Certificate numbering: Each certificate will be uniquely numbered when it is issued by APHA or DAERA. Local Authority inspectors should note that they don't have to produce another separate numbering system.

Foreign text: The Authorised Inspector should note that the foreign text in 8962EHC is an official translation of the English text, and the Authorised Inspector is accordingly authorised to complete the 8962EHC, even if they are unable to read and understand the meaning of the foreign text.

Each batch of edible aquatic animals exported to China must be accompanied by one original health certificate and two copies. The original certificate must travel with the consignment. Once the certificate has been issued, a certified copy must be sent to APHA Carlisle or DAERA within 7 days of signature. The Authorised Inspector must retain a legible copy and any supporting documentation for audit purposes.

6. GUIDANCE ON CERTIFICATION STANDARDS

6.1. Export health certificate 8962EHC must be completed according to latest guidance from the Authorised Inspector's regulatory body.

6.2. The inspection of the products for export is at the discretion of the Authorised Inspector based on objective evidence, and where appropriate, the policies and procedures of the Local Food Authority. See paragraphs 6.7, 6.8 and 6.9 for detailed guidance on documentary, identity and physical checks.

An audit trail, including information providing the basis for certification, must be kept by the Authorised Inspector in case discrepancies with any consignment are subsequently identified and, also, in case audits are required. See the paragraphs below on certification procedure for further guidance.

6.3. The Authorised Inspector 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.

6.4. **CERTIFICATION PROCEDURE**

Completion of export health certificate 8962EHC can be carried out at the place of production or at another place, such as at the airport/port of export from the UK.

If export certification is provided at a place remote from the production plant (such as an airport or port), it is the responsibility of the exporter to liaise, well in advance, with the certifying Authorised Inspector(s) to:

a) inform the Authorised Inspectors of the need for such certification and the expected timings;
and
b) ensure that all necessary documentation is provided for the Authorised Inspectors

Certification is based on satisfaction of the Authorised Inspector that:

- The product meets the conditions of the Health Attestation in Part IV of the Export Health Certificate.
- For exports of live crab to China, the crabs must have been caught/sourced from catch areas which do not exceed the fail/tolerance limit for cadmium and can be used for export of crabs to China (see paragraph 10 of these notes for guidance).
- Any supporting evidence is correct, accurate, and pertains to the specific batch of products intended for export.
- There are no apparent discrepancies between the consignment and the documentation accompanying it (not limited to the requirements of the Export Health Certificate).

A number of checks will be relevant to satisfy the Authorised Inspector of the points above.

When exporters have demonstrated consistent compliance with the export requirements, including traceability regarding the catch area, product labelling and identification, and consistency between consignments and documentation, Authorised Inspectors may use their professional judgement to decide on the need for specific checks if they do not have reasons to consider that they are necessary.

6.5. Before issuing 8962EHC to a particular company for the first time, in all cases, an additional full audit must be carried on the company's traceability systems. If significant concerns are noted, 8962EHC must not be issued. Subsequent audits must be carried out based on the judgement of the Authorised Inspector.

6.6. When carrying out documentary checks, the documents with the consignment must be checked to ensure that the details of the premises of origin are correct, that those premises are approved by the relevant competent authority in UK, and that the documented nature of the product is consistent with the consignment. The documents must contain details of UK approval of the plant, species of the product, exporter and importer details, number of pieces and net weights and identification marks (e.g. batch/package numbers) of the live aquatic animal product being exported and provide means to correlate them to the consignment. The Authorised Inspector will also need to check on the origin of the products (i.e. whether wild caught or farmed and the area(s) of sourcing) from information provided by the FBO.

6.7. The consignment details, for example, the number of boxes and weights, must be in conformity with the products specified on the

documentation and labelling. The Authorised Inspector must verify the number of packages / boxes / containers but in large consignments, an estimate of the number of packages / boxes / containers in the consignment can be carried out.

6.8. The packaging must be new (or clean and sanitised, if re-usable), in good condition, and not broken or visibly contaminated.

Broken packages are not acceptable and must trigger a thorough inspection, if observed.

6.9. Verification of the contents of packages / boxes / containers is at the Authorised Inspector's discretion (see paragraph 6.4) and it is for the Authorised Inspector to decide whether they need to open some, any, or all, of the containers / boxes in a consignment to establish that the contents are as described on the accompanying documentation.

If any containers/boxes in a consignment are opened, this inspection must be carried out in appropriate conditions and using procedures to avoid contamination of the product. If packaging is opened/undone during this inspection, the product must be closed/repackaged as necessary. When checks, specific for export purposes or otherwise, raise concerns that export requirements are not consistently met, Authorised Inspectors must refuse further certification until deficiencies are rectified, or require additional checks and/or inspections to be completed, until they are satisfied that they are no longer required.

If certification is provided at the point of export, LA Inspectors do not also need to inspect the details of the consignment at the place of production.

6.10 **Inconsistent information:** If documentary, identity or physical checks suggest inconsistencies between the information provided and the products for export, the Authorised Inspector must inform the APHA Centre for International Trade at Carlisle or DAERA.

7. CERTIFICATION AT THE PLACE OF PRODUCTION OR ELSEWHERE

7.1. If certification is provided at the place of production, this paragraph can be certified from personal knowledge or by reference to information provided by the food business operator.

7.2 **CERTIFICATION ELSEWHERE**

If certification is to be provided at a place, such as an airport, remote from the place of production, the exporter will need to liaise, well in advance, with the local Environmental Health Office for the place of production and the certifying Authorised Inspector at the place of certification, to inform the certifying Authorised Inspector of the need for such certification, the expected timings, and to ensure that all necessary contact information and required documentation is provided by the exporter. If required by the certifying Authorised Inspector, this may include documentation from the local Environmental Health Office for the plant. If certification is carried out at a place remote from the place of production, the documents sent with the consignment must be in a format acceptable to the certifying officer. It is suggested that documents, such as microbiological records if required, can be provided electronically.

It is the exporter's responsibility to ensure that communication with the Authorised Inspector occurs. If this does not take place, it is likely that the export may be delayed, and the consignment may then not be exported.

8. PRODUCTION MODE AND CATCHMENT/AQUACULTURE AREA

Table II of 8962EHC refers: For each different product in a consignment, the exporter must declare whether the product was wild caught or cultured, and the area of culture or catch.

Exporter must declare whether the product was wild caught or aquacultured at Table I. For wild caught products, the name and number of the vessel must be included at Table II.

For catch area, the ICES code FAO 27 should be applied together with relevant rectangles in parentheses in order to facilitate transparency and traceability.

'Not applicable' boxes must be crossed through.

9. CONSIGNMENT INFORMATION

Paragraph III refers. The required information is largely self-explanatory. However, for vehicle number, this can be interpreted as airline and flight number, as appropriate.

10. HEALTH INFORMATION

Paragraph IV refers. The following guidance should be read point-by-point against the health attestation in 8962EHC. Authorised Inspectors should only certify where they are satisfied, on the basis of personal knowledge, inspection, official monitoring information, documentary evidence, exporter declarations and/or laboratory results as appropriate, that the relevant requirement is met for the specific consignment.

IV.(i) Origin and production: Wild edible aquatic animals must have been caught legally in UK domestic waters or in international waters by registered UK vessels. Farmed edible aquatic animals must have been cultured in UK domestic waters. The Authorised Inspector should verify this from catch, landing, vessel, aquaculture, production and traceability records. Farmed aquatic animals or live aquatic animal products not farmed or aquacultured in the UK are outside the scope of 8962EHC.

IV.(ii) Veterinary medicines and prohibited substances: For aquacultured animals, this may be certified using the Authorised Inspector's knowledge of the producer, treatment records, medicines records, feed records and, where necessary, a signed producer declaration. For wild-caught animals, the veterinary medicines element should be considered in the context of capture, handling, temporary holding, packaging and transport rather than farm treatment records. Drugs prohibited by either China or the UK must not have been used; restricted or permitted drugs must only have been used in accordance with the relevant requirements.

IV.(iii) Official monitoring: The attestation on effective monitoring of animal diseases, toxic and harmful substances and food-borne pathogenic microorganisms should be supported by the relevant UK monitoring and surveillance systems, including official aquatic animal health

monitoring and applicable food safety surveillance. For live crab exports, the cadmium requirements must also be supported by evidence that the crabs originate from catch areas that do not exceed the agreed fail/tolerance limit and by SAGB Crab Monitoring Group data or exporter-funded testing where applicable.

IV.(iv) Clinical inspection before export: The Authorised Inspector must examine the consignment before certification and should not certify animals showing clinical signs of infectious or parasitic disease, obvious abnormality, or other findings inconsistent with export fitness. The inspection should be close enough to export to give meaningful assurance and should be recorded with the supporting evidence retained for audit.

IV.(v) Separation by catch area, establishment and species: Edible aquatic animals from different fishing areas or registered establishments must be packaged separately. Different species must also be packaged separately. The Authorised Inspector should check that packaging, labels, batch references and supporting records allow each package to be traced to the relevant catch area or registered establishment and species.

IV.(vi) Packaging containers: Packaging containers must be new or sanitised and suitable for maintaining animal survival and welfare during transport. Evidence may include visual inspection, packaging specifications, cleaning or sanitising procedures for reusable containers, and transport arrangements appropriate to the commodity and journey.

IV.(vii) Packing materials, water, ice and bedding: Packing materials, water or ice, and bedding materials must meet safety and hygiene requirements and must not contain pathogenic microorganisms, toxic or harmful substances, or aquatic organisms that could harm animals, plants, human health or the aquatic environment. The Authorised Inspector should seek proportionate evidence, such as source records for water or ice, supplier assurances, cleaning records, bedding specifications and visual checks.

IV.(viii) Labelling: The outer container or packaging must be labelled with the name and scientific name of the edible aquatic animals, fishing area information for wild aquatic animals, name and registration number of the farm or packaging establishment, exporter details and destination as the People’s Republic of China. The exporter is responsible for the accuracy of any Chinese text, but the Authorised Inspector should check that the required information is present and consistent with the certificate and supporting documents.

IV.(ix) Fitness for human consumption: This final attestation should only be certified once the Authorised Inspector is satisfied that the preceding certificate requirements for the points above, and the applicable UK food hygiene and animal health controls have been met. The evidence relied upon should be retained with the certificate record.

Producers and Authorised Inspectors should note that heavy metal controls, including cadmium controls for live crabs, are addressed under IV.(iii) and section 10. The producer remains responsible for appropriate surveillance and evidence, and the Authorised Inspector

should check that relevant evidence is available before certification.

If food business operators do their own end product testing they should inform local authorities when permitted levels are exceeded. If monitoring is carried out by local authorities and the 1881/2006 levels are exceeded, the local authority should inform the FSA/FSS and appropriate follow up action must be taken.

Regulation (EC) 1881/2006 (setting maximum levels for certain contaminants in foodstuffs), sets limits for heavy metals (and other substances such as dioxins and PCBs, polycyclic aromatic hydrocarbons (PAH)) in animals, including crustaceans.

The heavy metals listed are lead, mercury, cadmium and tin.

The products must also comply with Council Directive 96/23/EC, which is implemented in the UK by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997, and a programme referred to as the National Surveillance Scheme (NSS).

If testing under the NSS carried out by the FSA/FSS in E/W/S/NI detects residues of heavy metals (including arsenic) in products supplied for human consumption, this would be traced back and further investigations would then be done. This would include residues detected as a result of monitoring programmes carried out in live fishery products. Such surveys by FSA/FSS may be targeted following data from the monitoring of shellfish waters by the Environment Agencies under Directive 2006/113/EC of the European Parliament and of the Council of 12 December 2006 on the quality required of shellfish waters.

10 SPECIFIC CONTROLS FOR CADMIUM IN CRABS AND EXPORT OF CRABS TO CHINA – TESTING FOR CADMIUM AND AREAS THAT DO NOT EXCEED THE AGREED FAIL/TOLERANCE LIMIT FOR SOURCING/CATCHING CRABS WITH RESPECT TO LEVELS OF CADMIUM

As from January 2016, until agreed otherwise with China, the following controls on testing and source/catch areas will be implemented on live crabs to comply with China's requirements regarding the level of cadmium in live crabs exported from the UK to China for human consumption.

TESTING CRABS FOR CADMIUM AND OFFICIAL CONTROL OF THAT TESTING AND AREA SURVEILLANCE

FBOs are responsible for collecting crabs for sampling and testing and sending them to the laboratory as described in SOP on the export of live brown crabs (C*ancer pagarus*) from the UK to China.

FBOs that are members of the Shellfish Association of Great Britain (SAGB) should provide access to historical sampling data demonstrating that the crabs are from the approved fishery areas. If not, FBOs must ensure that crabs are taken for sampling and testing regularly and on average once every month from all the fishery areas used. The frequency of sampling and testing will be reviewed by DEFRA.

Costs of sampling and testing must be paid for by FBOs.

FBOs must collect and maintain records of all sampling and testing for cadmium that they do, whether this is official or unofficial, and whether routine or otherwise.

Records must be readily available for inspection at any reasonable time by the Local Authority, FSA/FSS/ DEFRA or the relevant Devolved Administration.

Records can be paper-based or electronic, but a backup must be kept. Records must be kept for at least 6 (six) years.

SAGB will monitor and control sampling and testing of crabs by individual FBOs and make results of sampling and testing available to the FBOs and LAs involved, and to DEFRA, the Devolved Administrations, and FSA and FSS.

Authorised Inspectors must check records of area testing for cadmium before consignments of crabs are certified for export to China.

Checks can be carried out on a rolling basis providing the Inspector has full awareness of the testing carried out, and of any changes, but the Inspector must record that checks are done and are current.

If DEFRA confirms that testing has shown that cadmium results in crabs from the catch area do not meet the Chinese requirement, and exceed the agreed fail/tolerance limit for cadmium, then APHA/DAERA will inform exporters and LAs involved that these catch areas cannot be used.

In this event LA Authorised Inspectors must not issue export health certificates for these areas until DEFRA has confirmed that the required level of compliance has been achieved, and APHA/DAERA has informed exporters and LAs that these areas can be used again.

DEFRA is responsible for informing GACC of surveillance testing for cadmium, and of non-compliances from areas which exceed the agreed fail/tolerance limit for cadmium, and actions taken.

DEFRA is responsible for informing GACC if exports from a certain area are being resumed.

It is important to note that all results of routine monitoring, surveillance, and exceedance, relate to a fishery area and not just to one exporter.

FBOs and Authorised Inspectors should note that the private testing described above is in addition to surveillance carried out under the National Surveillance Scheme (NSS), which implements the requirements of Council Directive 96/23/EC, which is implemented in the UK by the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) (England and Scotland) Regulations 2015 and equivalent regulations in Northern Ireland (2016) and Wales (2019).

Under the NSS, risk-based surveillance is carried out for cadmium in crabs but, in accordance with Regulation (EC) 1881/2006, only white meat from the appendages is tested.

FSA/FSS/FSS decide on routine official testing for substances such as cadmium in crabs and other food products as required under UK rules. The testing that is carried out is decided on the basis of a risk assessment.

PROCEDURES FOR DEALING WITH CADMIUM TEST RESULTS ABOVE THE MAXIMUM LEVEL OF 3.0MG/KG WET WEIGHT FROM CRABS FROM A SPECIFIC CATCH AREA

DEFRA is responsible for informing GACC of surveillance testing, non-compliances in respect of the failure tolerance limit, actions taken, and if exports are being resumed.

ACTIONS TO ENSURE THAT THE BACKGROUND LEVEL OF CADMIUM IN CRABS FROM THE CATCH AREAS USED FOR EXPORT OF CRABS TO CHINA DO NOT EXCEED THE

FAIL/TOLERANCE LIMIT

DEFRA decides which catch areas do not exceed the fail/tolerance limit for cadmium and can be used for export of crabs to China.

FBOs must ensure that crabs for export to China are not caught from areas that exceed the fail/tolerance limit and must provide information to their Authorised Inspector when checks are made and when consignments are certified for export to China.

SAGB will keep records of these areas and catches, and make this information available to FBOs and LAs involved, and provide reports every three months to DEFRA, FSA/FSS and the Devolved Administrations. If results above 3.0 mg/kg are obtained, SAGB will inform DEFRA. Exporters should join the SAGB Crab Monitoring Group to ensure access to this information.

If Authorised Inspectors identify that crabs are sourced from areas that exceed the fail/tolerance limit, those crabs must not be certified for export to China. In addition, the Authorised Inspector must inform If crabs from areas that exceed the agreed fail/tolerance limit for cadmium are exported to China, DEFRA will inform GACC.

11. DESTINATION OF PRODUCTS AND MEANS OF TRANSPORT:

Paragraph III(a) refers: The Authorised Inspector should ensure that the full details of the means of transport is also included at this paragraph. Accordingly, the means of transport, city of destination and country of destination should be included e.g. "By air freight, flight number BA1234 to Pudong airport, Shanghai, China".

12. COSTS OF EXPORT CERTIFICATION

Authorised Inspectors and exporters must note that charging for this export certification is a matter for them to agree on.

13. 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 must contact the APHA Centre for International Trade in Carlisle or DAERA