



HM Government

Trader readiness

For medical suppliers moving goods containing products of animal origin from the **EU** to **Great Britain** from 1 October 2021

If you have specific questions relating to the movement of products of animal origin, then please contact Defra by emailing spsanimalimportenquiries@defra.gov.uk or post your question on the EU Transition Trader and Industry [Community Forum](#) (you will need to register to post a question).

For the latest information on importing animal products, please see gov.uk guidance for [Importing or moving live animals, animal products and high risk food and feed not of animal origin](#)



What are the key changes from 1 October 2021 for medicines and medical products?

On 1 October 2021 **new sanitary and phytosanitary (SPS) controls will be introduced on imports of animal products** from the EU into Great Britain. This means that most goods containing products of animal origin (POAO) will need to provide **health certification** (such as an Export Health Certificate) and **pre-notification** before they are imported.

Finished medicinal products and CE marked medical devices containing POAO

- If your product contains POAO and is a **finished medicinal product or a CE marked device**, then the product is **exempt from SPS controls**.
- If your product is not classified in this way, then it is subject to the introduction of phased EU-GB SPS import controls from 1 October 2021, and **traders will need to comply with the new processes for importing POAO**.
- The import requirements vary depending on the type and composition of the animal product.
- **From 1 January 2022** POAO, including certain composite products, will be required to enter GB via an established point of entry with a Border Control Post (BCP).
- You can search for relevant GB Health Certificates for your goods [here](#).

From 1 October 2021

Traders importing non-exempt POAO from the EU into GB must:

- **Pre-notify** using **IPAFFS** before the goods arrive;
- Ensure the goods are accompanied by the relevant **GB health certificate**.

This includes composite products, unless they are otherwise exempt.

You must make sure the person you're importing from arranges the appropriate health certificate(s) in their own country. The original certificate (not a copy) must travel with the consignment and they must give you an electronic copy to upload to IPAFFS.



Requirements for non-exempt composite products containing POAO

Composite products are defined as a **foodstuff intended for human consumption that contains both processed products of animal origin (POAO) and products of plant origin**, and includes those where the processing of primary product is an integral part of the production of the final product.

Does my composite product require a health certificate?

- Your product must be accompanied by a GB health certificate from 1 October 2021 if it meets any of the following criteria:
 - ❑ It is a composite product that contains **processed meat product of any quantity**;
 - ❑ It is a composite product that contains **half (50%) or more any other processed products of animal origin in total** (such as gelatine, milk products, egg products, or fishery products). For example, if a product contained 30% processed egg and 25% processed fishery products, the total is 55% and a [composites health certificate](#) would be required;
 - ❑ The product **does not meet the requirements of [Article 6 of Commission Decision 2007/275/EC](#)**, even if it is a composite product which contains no meat and less than half processed dairy products.
- The meat product, milk product, egg product and fishery product content of the composite product must come from an approved country and where appropriate from an approved establishment. Further information on composite products and exemptions can be found [here](#).
- For further guidance, please see the [Animal & Plant Health Agency Import Information Note \(IIN\)](#) which outlines the health certificate requirements to import composite products from third countries.



What are the requirements of Article 6 of Commission Decision 2007/275/EC?

Composite products must meet certain requirements under [Article 6 of Commission Decision 2007/275/EC](#) in order to be exempt from SPS import controls. This includes the requirement for a commercial document to accompany the product.

To meet the requirements of Article 6.1 of Decision 2007/275/EC and be exempt from veterinary checks, composite products must contain less than half of their substance of any processed product of animal origin other than meat product and be:

- i. **shelf-stable at ambient temperature** or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance, so that any raw product is denatured;
- ii. **clearly identified as intended for human consumption;**
- iii. **securely packaged or sealed** in clean containers;
- iv. **accompanied by a commercial document and labelled in English**, so that document and labelling together give information on the nature, quantity and number of packages of the composite products, the country of origin, the manufacturer, and the ingredient;

In addition, Article 6.2 states that any dairy product included in any composite products shall only be derived from, and treated as provided for, countries listed in Annex I to [Regulation \(EU\) No 605/2010](#) as amended (Dairy Products).

The product must meet all the requirements of Article 6.1 and the requirement of Article 6.2 to be exempt from veterinary checks. Although not a requirement of Article 6 of Commission Decision 2007/275/EC, the Product of Animal Origin (POAO) must also come from a country with an approved Residue Plan.



Does my composite product require a health certificate?

Dairy

- Products containing **less than 50% processed dairy, and which meet the requirements in Article 6 of Decision 2007/275, are exempt from veterinary checks.** The dairy products must have undergone the **relevant treatment** (e.g. pasteurisation, sterilisation) in the country of origin of the dairy product (under regulation 605/2010). The **country of origin** of the dairy must be an approved third country with an approved residue plan.
- If the composite product is **more than 50% processed dairy**, then the product is **not exempt from veterinary checks** and will require a health certificate and pre-notification.

Gelatine

- Guidance on **importing gelatine for human consumption** is available [here](#).
- Composite products that contain gelatine will require a GB health certificate and pre-notification from 1 October 2021 if:
 - The product has more than 50% gelatine;
 - There are any meat-product ingredients;
 - If the product does not meet the requirements in Article 6 of Decision 2007/275.

Gelatine Capsules

- **For information on gelatine capsules for pharmaceutical use, please [contact MHRA](#).**
- Guidance on the import of unfilled gelatine capsules (not for pharmaceutical use) and food supplements not containing POAO encased in gelatine capsules is available [here](#).
- Food supplements containing POAO which are encased in gelatine capsules will need to adhere to the import requirements that apply to the POAO.

Fish

- Processed fishery products containing less than 50% processed fish, and which meet the requirements in Article 6 of Decision 2007/275, are exempt from veterinary checks.
- Non-composite fish products, such as non-processed fish oils, **will require a health certificate and pre-notification** from 1 October 2021.
- Gelatine capsules containing non-processed fish oil, such as cod liver oil supplements, are regarded as a fishery product (not a composite product) and are subject to veterinary checks. Traders should check [guidance](#) for further information on import requirements for fishery products.

Meat

- Composite products containing **any** amount of processed meat product **require veterinary certification and pre-notification** from 1 October 2021.



HM Government

Further information and guidance

Upcoming webinars for importers of POAO

- <https://www.gov.uk/guidance/webinars-for-importers-of-food-and-drink-products-from-the-eu-to-great-britain>

Moving POAO goods from GB to NI

- For POAO goods being exported from GB to NI, Export Health Certificates are not required to accompany goods until 1 October 2021 if you are registered with the Authorised Trader Scheme. Traders are encouraged to continue in their readiness preparations in the interim.

Further guidance

- Importing POAO: <https://www.gov.uk/guidance/importing-or-moving-live-animals-animal-products-and-high-risk-food-and-feed-not-of-animal-origin#importing-abp-and-poao>
- IPAFFS: <https://www.gov.uk/guidance/import-of-products-animals-food-and-feed-system>
- Health certificates for animal product imports to GB: <https://www.gov.uk/government/collections/health-certificates-for-animal-and-animal-product-imports-to-great-britain>
- Staged import controls: <https://www.gov.uk/government/publications/the-border-operating-model>
- Composite products: <https://www.food.gov.uk/business-guidance/importing-composite-products> and <http://apha.defra.gov.uk/documents/bip/iin/cp-1.pdf>
- Composite products FAQ: <https://www.food.gov.uk/sites/default/files/media/document/compositeproductsqanda.pdf>
- POAO transit movements from EU to GB to NI: <https://www.gov.uk/guidance/transiting-animals-and-animal-products-through-great-britain#eu-to-gb-to-eu-transits-from-april-2021>
- Importing food supplements: <https://www.food.gov.uk/business-guidance/importing-food-supplements-and-health-foods>
- Importing research and diagnostic samples containing POAO: <http://apha.defra.gov.uk/documents/bip/iin/abp-30.pdf>
- How to complete a health certificate: <https://www.gov.uk/government/publications/how-to-complete-a-health-certificate-for-imports-to-great-britain/how-to-complete-a-health-certificate-for-imports-to-great-britain>

If you have questions regarding importing POAO, please contact: spsanimalimportenquiries@defra.gov.uk