



Department
for Environment
Food & Rural Affairs

Guidance updates for certification of POAO exports to the EU and movements to Northern Ireland: Food Competent Certifying Officers (FCCOs)

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Purpose

To inform Food Competent Certifying Officers (FCCOs) of information to be aware of in relation to the certification of Products of Animal Origin (POAO) for export to the EU or movement to Northern Ireland. This Technical Note will be updated as new information becomes available. Yellow highlight indicates content has been amended in the text from previous versions.

To remind Local Authorities of contact details issued in December 2020 to use if you are unable to meet requests for EHC services due to a lack of capacity. Please see 'Further Information'.

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Background

- Since 1 January 2021, exports of certain POAO from Great Britain (GB) to the European Union (EU) require an export health certificate (EHC) signed by an officially designated Certifying Officer (CO).
- This guidance document highlights common issues that have arisen from the certification of consignments dispatched from GB to the EU, since the end of the Transition Period, and provides further information to help resolve these issues.

v4.1 Operator responsible for the consignment in the case of non-transiting goods

- EHC Online currently states that box I.6 (Operator responsible for the consignment of goods) should not be completed for imports into the EU and must only be populated for transit movements. Although optional in EU legislation, for imports it may be useful to complete this information. The text on EHC Online is being amended.

v4.2 Region of origin for exports where goods are not from and/or processed in the UK/GB

- Box I.7 of on EHCs for products of animal origin to the EU are pre-populated with the Country of origin name “UNITED KINGDOM” and ISO “GB”. This is accurate where the goods are produced, manufactured and/or packaged in Great Britain. Where this is not correct, this should be struck through and amended with the correct country of origin and ISO code. This amendment should then be stamped and initialled.

Items from previous version (new edits highlighted in yellow)

v3.1 Consignment weights

- We are aware that certain BCPs have suggested a specific format for the inclusion of gross and net weight in Part 1 of the certificate. The European Commission have confirmed that certificates must follow the requirements outlined in the relevant EU legislation from which they originate. As such, if the model EHC does not specify a format for gross weight and net weight any format that clearly outlines this information should suffice.
- For fishery products, it is recognised that the consignment weight at the point of completing a catch certificate may differ from the weight at the point of signing the

EHC. The European Commission has confirmed that there is no requirement for the two weights to match. However, the weight on the EHC should be comparable to the weight given on any commercial documentation accompanying the load to the BCP. Otherwise, the BCP may wish to trigger investigations, on suspicion that the weight provided on the certificate is incorrect.

v3.2 Consignor versus point of dispatch

- The European Commission has confirmed that the address of the 'Consignor' given in Part 1 of the certificate may be different from the address of the place of dispatch given in the same part of the certificate. The former is natural or legal person responsible for dispatching the consignment. This person/organisation may not always operate from, or be based at, the premises from which the consignment is dispatched to the EU.

v3.3 Means of transport

- We are aware of some BCPs insisting that the road vehicle transporting POAO is listed as the means of transport in Part I of the certificate, where a roll-on-roll-off (RoRo) ferry or train are the means of transport for crossing the border. The European Commission has clarified that, in the case of a ferry, the EHC should specify:
 - the number plate of the road vehicle
 - the identification number of the trailer (if applicable)
 - and the name of the scheduled ferry.
- Conversely a number of exporters have been providing details just of the road vehicle and not of the scheduled ferry and consignments have not been held up at BCPs. If a particular BCP is willing to accept this you may wish to continue with this approach.
- In any scenario, you should only select a single option from the different 'means of transport' in I.15, however. If providing the name of the ferry, this should be the 'vessel' option. If you are not able to provide the name of the ferry, you should select 'road vehicle'
- The means of transport selected in I.15 will also affect the place of loading entered into box I.13. If a ferry is indicated as the means of transport, the place of loading should be the point at which the vehicle embarks on to the ferry. If road vehicle is selected, the place of loading will be the point at which the consignment was loaded into the vehicle.

- If the transit details (e.g. scheduled ferry) change after the certificate has been issued, you do not need to request for a replacement EHC. However, the operator responsible for the consignment should advise the competent authority of the Member State of entry. They can do that via an email to the BCP official address, from the person or agent that made the CHED pre-notification declaration.

v3.4 Classified harvesting areas approval numbers for non-filter feeder gastropods (e.g. whelks and winkles) exported on the EHC for live bivalve molluscs fit for human consumption

- We are aware of some BCPs insisting on an approval number being entered into Part I of the EHC for the export of all consignments using the EHC for LBMs fit for human consumption. This is to indicate the harvesting area.
- Certain animals exported using this certificate do not require this information. Specifically, non-filter feeder *Pectinidae*, marine gastropods and *Holothuroideae* are exempt from the need to be harvested from a classified harvesting area. Where these animals have been harvested from unclassified waters, there is no requirement for an approval number to be entered into Part I of the certificate. This has been confirmed by the European Commission.

v2.1 Description of containers

- We are aware some consignments being rejected due to brand names being listed on the EHC in place of descriptions. Do not enter brand names on the description of containers but the physical characteristics of them (e.g. use “plastic pallet boxes” rather than “Dolaf”).

v2.2 Consignee details and place of destination (EHC and CHEDs)

- The EU Commission has confirmed that it is permissible for consignee details (name, address) entered into Part I of the EHC to be different from those of the details of the operator responsible for the consignment. As per Part I of Annex II of 2019/628 the consignee is the natural or legal person for whom the consignment is intended in the Member State of destination whereas the operator responsible for the consignment is the person responsible for the consignment on arrival at the EU BCP.
- The details of the consignee in the certificate do not have to match the details on the CHED. However, the CHED must state the correct address of the

consignee/consignees (if different to that in the certificate) and the place/places of destination. This is for the person responsible for the consignment to ensure it happens rather than the Certifying Officer (CO).

- For products to be placed on the EU market (i.e. those that are not following transit procedures), the EU have confirmed that the address of the consignee entered into the EHC and CHED must include a named individual and a complete address, located in the EU. This is the case even if the headquarters of the consignee are in the UK or another third country.
- Entering details of the place of destination in part I of the EHC is optional (aside from when products in transit are being stored), however this information is required in the CHED (TRACES importer declaration). It is possible for this information to be different to the address of the consignee.
- Where consignments are split at the BCP, the initial CHED must indicate the BCP as place of destination, and the various, onward places of destination must be declared in the subsequent CHEDs. In this case, the place of destination if entered on the EHC can (and would) differ from the real place of destination that must be mentioned in the CHED.

v2.3 Responsible operators and presence at BCP

- We have asked the Commission whether operators responsible for consignments (e.g. import agents) need to be physically present at the BCP. Article 15 of the OCR stipulates that operators “shall assist and cooperate with the staff of the competent authorities in the accomplishment of their tasks”. The Commission has confirmed that it is up to the local competent authorities to decide which kind of assistance they need. Where BCPs do not have their own workforce to handle the loads, they may request the operator responsible for the consignment or their representative(s) to be physically present at the BCP. Following confirmation from individual authorities, physical presence is required for:
 - Consignments sent to France
 - Unaccompanied consignments sent to the Netherlands

Exporters should confirm the requirements with the importing BCPs.

- Operators responsible for the consignment must be located in the EU territory. If they cannot be physically present at the BCP, the operator must make arrangements to provide assistance at the BCP. In the event of lack of assistance, a consignment may be rejected if this absence prevents the official controls from being properly performed.

v2.4 EHCs for non-EU Countries (excluding Northern Ireland)

- COs are reminded that UK's Chief Veterinary Officer has written to the UK's non-EU trading partners outlining that they can expect to receive goods bearing a variety of health /ID (oval marks) e.g. those being used pre-January 1st 2021 and those allowed post 31st December 2020. COs should consider this when certifying EHCs non-EU countries. Full guidance is available at <https://www.food.gov.uk/business-guidance/guidance-on-health-and-identification-marks-that-apply-from-1-january-2021> and <https://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/eu-exit-health-and-identification-marks>

v2.5 Groupage Export Facilitation Scheme

- COs are reminded that 30 day support attestations issued by a registered vet, Food Competent Certifying Officer, or CSO working for the certifying OV are an acceptable form of evidence for products exported under the Groupage Export Facilitation Scheme (GEFS).
- COs signing EHCs for GEFS members can place reliance on the 30 day support attestation as a form of evidence for the animal health and traceability information it contains, in relation to the products it covers.
- This has been agreed by the Royal College of Veterinary Surgeons and is detailed in the [Groupage Export Facilitation Scheme guidance](#).

v1.1 Stamping and signing (guidance below last updated 03/01/2021)

- When signing a certificate, a Certifying Officer (CO) should ensure that the certificate contains no deletions or alterations, other than those which are indicated on the certificate to be permissible, and any corrections to permitted entries, subject to such changes being initialled and stamped (in the margin) by the CO. Permissible deletions are normally indicated in the 'Notes' section at the end of the certificate, with the instruction 'Keep as appropriate'.
- Where the certificate contains optional or contextual statements, the statements which are not relevant shall be crossed out, **individually initialled and stamped** by the certifying officer, or completely removed from the certificate.
- Permitted paragraphs and sections may be crossed out by applying a 'Z' across the section or paragraph rather than crossing out line by line.

- We are aware of some BCPs demanding that all handwritten information in Part 1 of the EHC is initialled and stamped, including handwritten scoring out of otherwise blank boxes. There is no legal requirement in EU legislation that all the hand-written information entered in the certificate must be signed and stamped. It is only in the case of correction, in any part of the certificate, or in the case of statements to be crossed out, that the certifier must add signature (or initials) and stamp. This has been confirmed by the European Commission. The Commission noted however, in the case of a hand-written certificate, it is expected that the same one person completes the document. If not, the BCP might suspect that empty boxes were completed by another person after the certificate has been signed by the official certifier. You should consider checking with the specific BCP regarding their preference when it comes to the stamping and initialling of handwritten scoring out of otherwise blank boxes in Part I of the EHC.
- Clarification from the European Commission means that all pages (as opposed to sheets of paper) are signed and stamped once individually in place of fan stamping and in addition to the stamping of any permitted alterations. There is no requirement to fan stamp and the Notes for Guidance may be disregarded in this respect and will be updated as soon as possible.
- The certificate reference number must be provided on each sheet, the pages must be sequentially numbered to span the languages included and any schedules, and each page must bear the signature and official stamp of the CO, i.e. if four A4 pages are printed back to back on two sheets of A4 paper, all four pages must be stamped and signed. Certifying Officers will have to make handwritten corrections to pages numbering as may be required E.g. 1/4 to 4/4 in the example given above. We advise that the original page numbering should not be deleted but we are seeking confirmation on this from the EU Commission.
- The colour of the official stamp and the signature must be different to the colour of the printed text of the certificate. We have had feedback that some BCPs have insisted blue ink is required when signing and stamping EHCs. This is incorrect. Defra has received confirmation from the EU Commission that stamps and signatures on the original certificate must be clearly different from the colour of the printed text in the document, but do not need to be a specific colour.
- Certifying Officers are reminded to consult the Notes for Guidance (NfG) prior to the certification of each EHC.

v1.2 Time of departure (guidance below last updated 20/01/2021)

- Specific EU BCPs may request that box I.14. includes the time of departure, as well as the date. This is not a requirement for POAO, for which only the date is required. Defra has confirmation on this from the EU Commission and expects that BCP officials will be revising their requirements in this regard.

v1.3 Commodity Codes (HS Codes) (guidance below last updated 20/01/2021)

- The CO should confirm with the exporter that the HS Code used correctly describes the products being consigned. Further information on HS Codes can be found online at:
<https://www.gov.uk/trade-tariff/sections>
<http://madb.europa.eu/madb/euTariffs.htm>
- There is information at the bottom of the majority of EHCs, in the notes section, with example commodity codes of 4 digits. If there is not enough space in Box I.19 to include all the commodity codes needed, please use a schedule.
- Information on how to create a schedule is available on [APHA's Vet Gateway](#).
- The European Commission has confirmed that CN codes (8 digits or more) cannot be required in the official certificate (EHC), as only HS codes (max 6 digits) are required here. In any case, the best accuracy for the classification of the goods is expected in the CHED, not in the certificate.

v1.4 Description of Goods Box I.25 (guidance below last updated 20/01/2021)

- Where the exporter requires more than 5 species or products to be listed in box I.28, the information should be added in a schedule. Please ensure you follow the requirements for adding a schedule as it becomes part of the certificate.
- Information on how to create a schedule is available on APHA's Vet Gateway

v1.5 Re-exporting POAO to the EU (guidance below last updated 20/01/2021)

- Most products of animal origin from the EU will not require an EHC to be imported into GB until April 2021. During this period, products that are being re-exported to the EU will need to be certified with an EHC and the CO will require the relevant health and traceability information. Unless exempted from certification, this product will also need certification if moved to Northern Ireland. There are a number of options for obtaining this information.
- Commercial documentation or PVS attestation from the EU Member State can be accepted, if the EU supply chain is stable. The stability can be attested to based on a one-off certificate from an EU vet.
- Where supply chains are not stable (one-off or irregular) then COs may request a higher level of proof rather than just commercial documentation.
- The NfGs contain information regarding evidence needed for EU (and NI) origin product (imported before April 2021) are sufficiently flexible for OVVs to accept appropriate documentation.

v1.6 Certified Copies of EHCs (guidance below last updated 26/01/2021)

- A certified copy should only be made:
 - for the CO to retain themselves or to forward to the Centre for International Trade APHA if the notes for guidance require this, or
 - by prior agreement with the BCP, in the specific case of unattended consignments, when the risk of the certificate getting lost is high. In this case the original should be forwarded to the BCP by post or courier and the certified copy accompanies the consignment.
- A certified copy should not be made to forward to the importer for completion of CHED Part 1 or as an electronic copy to the BCP for advance checks as the BCP will expect the EHC that travels with the Consignment is an exact match copy, i.e. not annotated as 'certified copy'. A standard colour or black and white copy of the original EHC is the better format for advancing to the importer and to the BCP for advance checks prior to arrival of the goods with the EHC attached.

v1.7 Composite products (guidance below last updated 20/01/2021)

- BCPs and BCP officials are under instruction to check products and determine whether products are composite products or not as this has legal context for importation checks and requires specific certification and checks accordingly. In order for BCP officials to make this assessment, they will or may need information on both the ingredients of and the processes that are involved in producing the product. This is usually only the case with new products and when a BCP is familiar with the product and source does not require this on an ongoing basis.

Further Information

For further information, please visit the '[Information for Food Competent Certifying Officers \(FCCO\)](#)' heading on the 'Preparing local government for 1 January 2021' Gov.uk page.

You can also contact the Animal and Plant Health Agency's Centre for International Trade (CIT) on 03000 200 301.

If you require advice on matters relating to the certification or attestation of fishery products, you can contact certificationcapacity@apha.gov.uk. Please note – for problems or queries about specific exports you should contact CIT as above.

Should you identify significant gaps between demand for certification and your capacity as a provider, please contact CertificationCapacity@apha.gov.uk. We may be able to offer support on a temporary basis.