

Importing composite products

A composite product is defined in legislation as a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin.

The definition of composite products includes those products, where the processing of primary product is an integral part of the production of the final product.

General Information

Assimilated [Commission Decision 2007/275/EC](#) and [Regulation No. 28/2012](#) set out import conditions for importing composite products from approved countries.

Import requirements apply to composite products containing any processed meat product, or half or more of their content of other processed products of animal origin such as:

- milk products
- egg products
- fishery products

Requirements include that the composite product must come from a country listed in the legislation as approved for the product of animal origin contained in the composite product and have an approved veterinary residue plan as required by Decision 2011/163/EU, as listed [here](#).

The meat product, milk product, egg product and fishery product content of the composite product must also have come from an approved country and where appropriate from an approved establishment.

The composite product must be accompanied by the relevant official certificate in [Regulation 2019/628](#) if they contain processed meat, milk, egg or fishery product.

Composite products containing any other animal product must be accompanied by the relevant certificate required for the particular animal content or in other cases by a commercial document.

Composite products where less than half their content is processed milk product are also subject to these requirements except where the conditions in Article 6 of Decision 2007/275/EC are met.

Composite products referred to above are subject to veterinary checks at Border Control Posts (BCPs).

A composite product that contains no processed meat product and less than half its substance of other processed product of animal origin is also subject to veterinary checks at BCPs except where they meet the requirements of Article 6 of Decision 2007/275/EC. The milk content must only come from a country approved for dairy products.

Products not subject to checks

Annex II of Decision 2007/275/EC lists some composite products and foodstuffs which are not subject to veterinary checks and these are

- confectionery (including sweets) and chocolate, containing less than 50% of processed dairy and egg products
- pasta and noodles not mixed or filled with processed meat product; containing less than 50% of processed dairy and egg products
- bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products that contain less than 20% of processed dairy and egg products
- olives stuffed with fish
- soup stocks and flavourings packaged for the final consumer, that contain less than 50% of fish oils, fish powders or fish extracts
- food supplements packaged for the final consumer, that contain small amounts (in total less than 20%) of processed animal products other than meat products

Food business operators are reminded that it is their responsibility to ensure any foodstuffs they want to import comply with national rules in place to protect public and animal health. Importers should satisfy themselves that any composite products coming to GB comply with the import conditions as set out in Decision 2007/275/EC and Regulation 28/2012. It is worth remembering that where a safeguard control applies, for instance Indian aquaculture, to the processed products of animal origin, it would also apply to the finished composite product.

Importing composite products from EU and non-EU countries

[Imported composite food from the EU are considered as low risk and subject to different levels of checks at the border](#), which are described on GOV.UK.

For non-EU imported composite foods, these are treated as medium risk and [this guidance describes the controls that will be applied at the border](#).

The above links show the Border Target Operating Model (BTOM) risk categories and inspection percentages for imports of composite products.

Imports will be subject to identity checks and physical checks. The percentage rates of identity and physical checks (the inspection rate) depends on the risk category of the commodity being imported:

- medium risk category commodities will be inspected at a rate between 1% and 30%
- low risk category commodities will not be subject to routine inspection, but they may be subject to non-routine or intelligence-led checks

Products from non-EU countries are considered as low risk if they are shelf stable at ambient temperature and sterilised. The above link provides further guidance on what products would be considered to be shelf-stable.

References to EU legislation in FSA guidance

Directly applicable EU legislation no longer applies in GB. EU legislation retained when the UK exited the EU became assimilated law on 1 January 2024, published on legislation.gov.uk. References to any legislation in FSA guidance with 'EU' or 'EC' in the title (e.g. Regulation (EC) 178/2002) should now be regarded as assimilated law where applicable to GB. References to 'Retained EU Law' or 'REUL' should now be regarded as references to assimilated law.

For businesses moving goods from Great Britain to Northern Ireland, information on [the Windsor Framework](#) is available on GOV.UK.

The Windsor Framework was adopted by the UK and EU on 24 March 2023. The Framework provides a unique set of arrangements to support the flow of agrifood retail products from Great Britain (GB) to Northern Ireland (NI), allowing GB standards for public health in relation to food, marketing and organics to apply for pre-packed retail goods moved via the NI Retail Movement Scheme (NIRMS).