Chapter 3 Imported and Exported Meat and Animals

This chapter details the controls on meat approved establishments exporting meat and meat products and import controls on meat products.

Sections

1. Introduction

In this section

1.1 Legislation

1.1.1 Applicable regulations

- Assimilated Regulation (EC) 852/2004
- Assimilated Regulation (EC) 853/2004
- Assimilated Regulation (EC) 2073/2005
- The Hygiene (Wales) Regulations 2006 (as amended)
- The Food Safety and Hygiene (England) Regulations 2013 (as amended)
- Assimilated Regulation (EU) 2017/625
- Assimilated Regulation (EU) 2019/625
- Assimilated Regulation (EU) 2019/626
- Assimilated Regulation (EU) 2019/628
- Assimilated Regulation (EC) 999/2001
- The TSE (England) Regulations 2018
- The TSE (Wales) Regulations 2018
- Regulation (EC) 99/2002
- Regulation (EC) 1760/2000
- Regulation (EC) 178/2002
- The General Food Regulations 2004

- The Official Controls (Animals, Feed and Food) (England) Regulations 2006
- The Official Controls (Animals, Feed and Food) (Wales) Regulations 2007
- The Trade in Animals and Related Products Regulations 2011
- The Trade in Animals and Related Products (Wales) Regulations 2011
- Assimilated Regulation (EC) 1069/2009
- Assimilated Regulation (EC) 142/2011
- The Animal By-Products (Enforcement) (Wales) Regulations 2014
- The Animal By-Products (Enforcement) (England) Regulations 2013
- The Cattle Identification Regulations (England) / (Wales) 2007 (as amended)
- The Disease Control (England) / (Wales) Order 2003 (as amended).

1.2 FBO responsibilities

1.2.1 Duties of the FBO

It is the Food Business Operator's (FBO) duty to ensure that imported meat and meat products, and meat and meat products for export entering the establishment comply with all relevant legislation.

FBOs must have appropriate food safety management systems in place to ensure that imported carcases and carcases for export meet requirements for removal of specified risk material (SRM).

1.2.2 Notification of imported beef

The FBO must contact their Inspection Team Leader (ITL) 72 hours in advance of an imported beef delivery from countries with a controlled or undetermined BSE risk containing vertebral column (VC).

The ITL will arrange appropriate FSA verification of the process and controls in place, as required.

2. Imports

In this section

2.1 Imports from MS

2.1.1 Background

Within the Single Market, trade in animal products and live animals between Member States (MS) is subject to harmonised EU rules.

All MS must operate a system of intensified checks at the point of origin, to ensure that only those consignments complying with EU rules may enter intra-EU trade.

Single market rules dictate that there are no routine animal or public health checks at ports of entry from other EU MS, but random and non-discriminatory spot checks at the place of destination are permitted.

Most products of animal origin consigned to the UK from other MS must originate in an approved establishment and be accompanied by an official health certificate or commercial document (depending on the product). The certificate or document would contain information on the origin and destination of the products and may include public or animal health attestations.

2.1.2 Reason for checks

The OV carries out random verification that the meat complies with the EU rules. These checks are to ensure that fresh meat, poultry meat and other animal products comply with animal and veterinary public health conditions relating to trade. For example, checks are made on health marking or identification marking and accompanying documentation.

Regulation: Regulation (EC) No. 853/2004, Article 5

Random checks should be made to ensure:

- SRM controls have been fully complied with
- the meat is properly health marked or identification marked
- accompanying documentation is correct and has been completed accurately
- hygiene rules have not been breached
- any seals on packaging are intact
- the consignment has not come from a restricted region subject to specific animal health controls

Note: The FSA is no longer required to carry out 100% checks on compliance with SRM removal requirements. However, the OV must verify that the FBO has robust systems in place to ensure that meat entering the food chain is free from SRM.

2.1.3 Action post check

If the initial checks on health marking or identification marking and documentation raise suspicion that rules have been breached, the OV is to use professional judgement on what further action is appropriate.

2.2 Consignments returned from MS

2.2.1 Meat returned from MS

Consignments of meat and other animal products which originated in GB can be rejected by a competent authority of another MS for failure to comply with the regulations. For example, meat incorrectly or inadequately health marked or identification marked.

These consignments may only be returned to GB if authorisation is granted by the following authorities:

England:

- Defra Imports and EU Trade Team
  Nobel House
  Area 46
  17 Smith Square
  London
  SW1P 3JR

  020 7238 6000
  ITAP@defra.gsi.gov.uk

Wales:

- James Gibbs
  Exotic Animal Diseases Branch
  Office of the Chief Veterinary Officer
  Department for Environment and Sustainable Development
  Welsh Government
  Cathays Park
  Cardiff
  CF10 3NQ

  02920 823831
  james.gibbs@wales.gsi.gov.uk

2.2.2 FSA OV action

The licence from the competent authority of the MS will provide the reason for return. Upon receipt at the GB plant, the OV should establish whether the meat:

- poses a risk to human or animal health
- fails to comply with the relevant regulations, or
- needs to be placed under restrictions, for example pending further decisions for salmonella cases

If the OV suspects that the returned meat or animal products are unsatisfactory, then action should be taken.

2.3 Third country imports

2.3.1 Background

Each import consignment must:

- come from a country approved to export that type of product to the EU
- be accompanied by animal health and public health certification
- come from EU-approved premises
- enter the EU through a Border Control Post (BCP) where veterinary checks must be carried out

Remember that general EU regulations will also apply. Link to lists of third country Product Establishments:

2.3.2 Border Control Posts (BCPs)

BCPs operate under the responsibility of a Portal OV. The designation for a Portal OV is different to the designation of OV by the FSA. Portal OVs are appointed by a local authority (LA), or Port Health Authority and designated by Defra after completion of a specific Defra led training course.

2.3.3 Checks on third country imports

The table below outlines the checks on third country imports.

Step	Details
1	Meat, and other products of animal origin, from third countries outside the EU are checked at an authorised BCP on the EU's external border. This could be a BCP in GB or elsewhere within the EU.
2	After satisfactory inspection at the BCP, the Portal OV issues a certificate confirming that veterinary checks have been carried out. The certificate is known as a Common Health Entry Document (CHED). **Reference**: See Annex 1 in this chapter.
3	The original health certificates issued by the originating country are retained at the BCP and an authenticated copy is given to the transporter.
4	CHED travels with the consignment to the first approved establishment whilst under customs bond. There is no need for the authenticated copy of the CHED to accompany the load.
5	From the first approved establishment, the meat then travels with commercial documents only.
6	The FSA OV at any subsequent approved establishment will make random checks on consignments and accompanying paperwork. These checks include: EU rules on the origin of the product (authorised country and establishment) • health marking, or • identification marking • documentation • transport • wrapping and packaging.

2.3.4 Legislation relating to inspection and checking of imports

Regulations:

- Regulation (EC) 999/2001 Annex IX, Chapter C, (as amended)
- Regulation (EU) 2017/625, Articles 43 to 57.3, Article 65, Article 66.6
- The Trade in Animals and Related Products Regulations 2011, Regulations 15, 19 and 20
- The Trade in Animals and Related Products (Wales) Regulations 2011, Regulations 15, 19 and 20

2.3.5 Documentation missing

All third country meat, regardless of the point of entry, should arrive at the first point of destination accompanied by a CHED.

If documentation for a consignment selected for checking is missing, contact Operations at York.

2.3.6 UK meat returned from third country

UK meat and animal products returned from outside the EU are subject to the conditions laid down in:

- the Trade in Animals and Related Products Regulations 2011, Regulation 27 (in England)
- the Trade in Animals and Related Products (Wales) Regulations 2011, Regulation 27

Re-import will only be permitted if there is evidence that the product has not lost its EU status. The normal requirements are:

- the consignment is returned with the original export health certificate
- a statement giving the reasons why the consignment is being returned
- a guarantee that the conditions governing storage and transport have been observed and that the product has not been handled
- in the case of products in a sealed container, a certificate from the carrier stating that the contents have not been handled or unloaded
- in the case of products not in a sealed container, a declaration that it has not undergone any handling other than, in the case only of packaged products, loading and unloading of unopened packages

The OV should check to see that all such consignments are accompanied by a CHED and the necessary third country guarantees, and that EU requirements concerning marking are still met.

2.4 Additional duties for imported beef

2.4.1 Overview of OV responsibilities

The OV must carry out random inspection of consignments of imported meat in the cutting premises to verify FBO compliance with SRM controls to ensure that imported beef is free from SRM (spinal cord).

2.4.2 Verification checks

The FSA is no longer required to carry out 100% checks on compliance with SRM removal requirements. However, the OV must verify that the FBO has robust systems in place to ensure that meat entering the food chain is free from SRM.

The level of checks will depend on the meat being imported. Random unannounced verification inspections should be carried out by an authorised officer (AO), with further intelligence based inspections as appropriate (taking into account status of the country of origin).

Full checks on the FBO's procedures must be carried out as part of the audit process (see chapter 4 on 'Audit, HACCP and verifying operator's own checks'). As part of the audit, the OV must verify that the FBO has robust systems in place to ensure that meat entering the food chain is free from SRM.

2.4.3 TSE Regulations

Imported animals and animal products must meet the requirements of Regulation (EC) 999/2001 (as amended) which lays down rules designed to prevent, control and eradicate certain Transmissible Spongiform Encephalopathies (TSEs).

Regulation (EC) 999/2001 applies to production and placing on the market of live animals and products of animal origin, and in certain specific cases to exports.

2.4.4 Definition of SRM in imported beef

SRM in beef imported from countries with a controlled or undetermined BSE risk is defined as:

Definition of Specified risk materials in imported beef

All ages	• tonsils • intestines from the duodenum to the rectum • mesentery
Over 12 months	Skull excluding the mandible and including the brain and eyes, and spinal cord
Over 30 months	VC including the dorsal root ganglia, but excluding: • vertebrae of the tail • spinous and transverse process of the cervical, thoracic and lumbar vertebrae • median sacral crest and wings of the sacrum

Note: Before reporting SRM, remember to check the age of the animals on the documentation. Only the intestines, tonsils and the mesentery in imported beef from animals under twelve months of age are designated as SRM.

2.4.5 Permitted cuts containing SRM vertebral column

It is permitted to import from other MS:

- whole carcases
- half carcases
- half carcases cut into no more than 3 wholesale cuts
- quarter carcases

with the VC remaining, providing that they are sent directly to a licensed cutting plant which holds an additional approval to remove bovine VC.

Reference: See chapter 2.7 on ‘SRM’ for further details on additional approvals to remove bovine VC.

2.4.6 Non-permitted cuts containing SRM vertebral column

Smaller cuts of beef containing VC are not permitted to be imported into GB from countries with a controlled or undetermined BSE risk and are an illegal import of SRM, unless accompanied by a declaration stating they are derived from animals which are under 30 months at the time of slaughter.

Reference: See topic 2.5.16 on ‘Unsatisfactory consignments: SRM’ in this chapter for additional information.

2.4.7 Operator responsibility for beef from countries with a controlled or undetermined BSE risk containing vertebral column

The FBO must contact their ITL 72 hours in advance of an imported beef delivery from countries with a controlled or undetermined BSE risk containing VC.

The ITL will arrange appropriate FSA verification of the process and controls in place.

2.4.8 Commercial document

A commercial document must accompany the load specifically indicating the number of bovine carcases or cuts:

- from which removal of the VC is required
- from which removal of the VC is NOT required

Reference: (EC) 999/2001 (as amended) Annex V, 11 3 (b).

2.4.9 Labelling requirements

Bovine carcases, or parts of carcases, containing VC from countries with a controlled or undetermined BSE risk if over 30 months of age will have a red striped label attached as described in Regulation 1760/2000 and the VC must be removed at a cutting plant which holds an approval for its removal.

EU legislation requires the label to indicate:

- the ID number for the animal (or relevant group of animals)
- the approval number for the slaughterhouse / cutting establishment and / or
- the MS of slaughter, cutting or export

Reference: (EC) 1760/2000, Article 12 requires the label to be attached to the meat, pieces of meat or to the packaging material.

2.5 Unsatisfactory consignments of imported meat

2.5.1 Categories

Unsatisfactory consignments may be classified into the categories listed below:

- Public health:
    - wrapping and packaging
    - contamination / fitness for consumption
    - health marking
    - identification marking and labelling
    - health certificates / commercial documents
    - temperature
    - disease / animal health
    - SRM presence
    - unsatisfactory sampling results.
- Unchecked consignments:
    - that have not been brought into GB through an approved BCP
    - that have been removed from a BCP without a CHED or the authority of the OV at the BCP
    - that were transferred from the BCP to a destination not specified in the CHED.
- Animal health:
    - notifiable disease detected
    - identified as likely to cause a serious hazard to humans or animals
    - an uncertified product comes from an area infected by an epizootic disease
    - documentation fails to certify the consignment is free from disease.

2.5.2 Action

The action taken for the unsatisfactory consignments will depend upon the severity of the problem and instruction given by the FSA.

It is necessary that any unsatisfactory consignments are reported in accordance with this chapter.

2.5.3 Provisions applicable to the wrapping and packaging of foodstuffs

Wrapping and packaging must conform to the requirements of Regulation (EC) 852/2004 Annex 2, Chapter X.

Checks should be made to ensure the integrity of the packaging and that the packaging fully protects the meat from the risk of contamination.

2.5.4 Health marking / identification marking

Imported consignments received in approved establishments must bear the appropriate health mark / identification mark.

Reference: Health marking requirements of Regulation (EC) 853/2004, Articles 5 and 6.1(c)(i), Regulation (EU) 2017/625, Article 18.4, and Commission Implementing Regulation (EU) 2019/627, Article 48 and Annex II. Identification marking requirements of Regulation (EC) 853/2004, Articles 5 and 6.1(c)(i) and Annex II.

2.5.5 Documentation

Consignments received in approved establishments must be accompanied by the appropriate documentation.

Reference: See ‘FSA role: checks on imported fresh meat’ in this chapter for additional information.

2.5.6 Temperature limits

Fresh meat must not be exported from the country of origin, including EU MS, unless it has been chilled to a specified internal temperature, and maintained at that temperature throughout the period of transport. The internal temperature that the meat must not exceed is listed in the tables below:

Type of meat	Part of meat	Maximum temperature (°C)
Fresh meat (red)	Carcases and cuts	+7
Fresh meat (red)	Offal	+3
White meat	Poultry carcase	+4
White meat	Poultry offal	+4
Wild game	Large	+7
Wild game	Small	+4

Type of meat	Maximum temperature for storage and transport (°C)
Mince meat (Fresh)	+2
Mince meat (Frozen)	-18
Meat preparations (Fresh)	+4
Meat preparations (Frozen)	-18
Mechanically separated meat (Fresh)	+2
Mechanically separated meat (Frozen)	-18

2.5.7 Unsatisfactory consignment from MS: public health, legislation

Action may be taken for any import which does not meet animal or public health conditions relating to the legislation.

Regulations:

- Regulations (EC) 852/2004, 853/2004
- Regulation (EU) 2017/625
- Regulation (EC) 2073/2005 (as amended)
- The Food Hygiene (Wales) Regulations 2006
- The Food Safety and Hygiene (England) Regulations 2013
- Regulation (EC) 178/2002, Article 14
- The General Food Regulations 2004
- Regulations (EC) 1069/2009 and 142/2011
- The Animal By-Products (Enforcement) (No 2) (Wales) Regulations 2011
- The Animal By-Products (Enforcement) (England) Regulations 2013

2.5.8 Unsatisfactory consignment from MS: public health, OV action

The OV is to take the action detailed in the following table in the event of an unsatisfactory consignment from a MS due to a public health issue.

Note: Operations will advise the OV in writing, by fax or e-mail, of the action required for any unsatisfactory meat.

Reference: See topic 2.5.16 on ‘Unsatisfactory consignments: SRM’ for additional guidance.

Unsatisfactory consignment from Member States: OV action

Step	Action
1	Serve either: • a Section 9, Food Safety Act 1990 Detention of Food Notice (ENF 11/1) or • a Regulation 9 (5) Food Hygiene (Wales) Regulations 2006 Detention Notice (ENF 11/26 (S)/(W)) or • a Regulation 10(1) Food Safety and Hygiene (England) Regulations 2013 Detention Notice (ENF 11/26 (E) to detain unsatisfactory meat, until an FSA decision is provided. The costs incurred to comply with any Notices issued are borne by the owner or his agent.
2	Copy completed notice to the Corporate Support Unit (CSU) York Transactions Team by email.
3	Complete a form IMP 8/1 Imported meat: Unsatisfactory consignments from MS / third countries, as fully as possible. Email the completed form to the Operations team, then send it by post to Operations, Food Standards Agency, York. **Reference**: See chapter 9 on ‘Forms’ for form IMP 8/1. Operations will inform the relevant technical and policy team.
4	Take photographs of the non-compliant consignment and email or post these to CSU York Transactions Team.
5	Email copies of the commercial documentation, where available, to CSU York Transactions Team.

Step	Action
6	Operations will contact the OV when a decision is made on the action to take, so the OV can require the consignment to be: • destroyed as an animal by-product (ABP), or • used for pet food, or • returned to country of origin, or • released for sale. Where the product must be destroyed as an ABP, request voluntary surrender and oversee staining (where required) and disposal. Where the FBO refuses to dispose of a consignment, the OV should require its disposal in accordance with the ABP (Enforcement) (England) / (Wales) Regulations. A Notice for the Disposal of ABP (ENF 11/12) should be served for its disposal, if required.
7	Confirm to the CSU York Transactions Team when the consignment has been disposed of, released or returned. **Reference**: See point 2.5.17 'Disposal of unsatisfactory consignments' in this section for additional information.

2.5.9 Communication with exporting country

It may be necessary for the FSA or Defra to raise the matter with the exporting country. This will be done by the Chief Veterinary Officer (CVO).

Caution: The OV must not take the matter up directly with the exporting country.

2.5.10 Unsatisfactory consignment from third countries: public health, legislation

Where meat imported from a third country is suspected to be unfit for human consumption, the OV has powers to require destruction or re-export.

Note: The OV should not exercise these powers, but should follow the process below. Operations will advise the OV (in writing, or email) of the action for any unsatisfactory meat.

Reference:

- Regulation (EU) 2017/625, Articles 65 to 72
- The Trade in Animals and Related Products Regulations 2011, Regulation 20
- The Trade in Animals and Related Products (Wales) Regulations 2011, Regulation 20
- Regulation (EU) 2017/625
- Regulations (EC) 1069/2009 and 142/2011
- The Animal By-Products (Enforcement) (No 2) (Wales) Regulations 2011
- The Animal By-Products (Enforcement) (England) Regulations 2013.

2.5.11 Unsatisfactory consignment from third country: public health, OV action

The OV is to take the following action in the event of an unsatisfactory consignment from a third country:

Unsatisfactory consignment from third country: Official veterinarian action

Step	Action
1	Serve a detention notice under Regulation (EU) 2017/625, Article 66(6) (Form ENF 11/32).
2	Copy completed notice to the CSU York Transactions Team by email (access contact details in chapter 1 on 'Introduction').

Step	Action
3	Complete a form IMP 8/1 Imported meat: Unsatisfactory consignments from MS / third countries, as fully as possible. Email the completed form to the CSU York Transactions Team, then send it by post to Operations, Food Standards Agency, York. **Reference**: See chapter 9 on 'Forms' for form IMP 8/1. Operations will inform the relevant technical and policy team(s).
4	Operations will notify the OV if further information is required. For example, photographs, copies of commercial documentation.
5	Take relevant photographs wherever possible and email or post these to the CSU York Transactions Team.

6	Operations will contact the OV when a decision is made on the future of the consignment. Operations cascades information to the OV, so that they:
	
	• may order the consignment to be destroyed
	• allow the consignment to be used for purposes other than originally intended
	• allow re-despatch of the consignment outside the community, provided that:
	  ◦ the destination is agreed with the FBO responsible for the consignment **and**
	  ◦ the FBO responsible for the consignment has informed the competent authority (CA) of the third country of origin, or destination of the reasons why the food cannot be placed on the market within the community, **and**
	  ◦ where the third country of destination is not the third country of origin, the CA of the third country of destination has informed the CA of its willingness to accept the consignment.

7	Details of any non-conforming products or illegally imported products from third countries must be entered on an IIT1 form. Contact Operations (contact details as above) for a blank copy of form IIT1 for completion. Completed IIT1 forms should be sent to: England: iit@defra.gov.uk Wales: james.gibbs@wales.gov.uk Also send a copy of the completed IIT1 to CSU York Transactions Team.
8	Confirm to Operations when the consignment has been disposed of, released or returned. **Reference**: See 2.5.17 on 'Disposal of unsatisfactory consignments' in this section for additional information.

2.5.12 Communication with exporting country

It may be necessary for the FSA or Defra to raise the matter with the exporting country. This will be done by the Chief Veterinary Officer (CVO).

Caution: The OV must not take the matter up directly with the exporting country.

2.5.13 UK BCP imports

In the case of meat imported through a UK BCP, the OV should immediately notify Operations who will inform the appropriate body.

Unsatisfactory consignment from third country: Official veterinarian action

Meat imported	Operations contact
Through a UK BCP	APHA official responsible for the BCP
Through another MS BCP	FSA to contact MS

2.5.14 Unchecked consignments

Where evidence exists that consignments may have been:

- imported into GB other than through an authorised BCP
- removed from a BCP without a CHED or the authority of the BCP OV
- transported from a BCP to a destination other than the one specified in the CHED, the OV should follow the steps in the following table:

Unchecked consignments

Step	Action
1	Seize and detain the consignment under The Trade in Animals and Related Products Regulations 2011, to conduct further checks. **Regulation**: • The Trade in Animals and Related Products Regulations 2011, Regulations 13, 19 and 20(6) • The Trade in Animals and Related Products (Wales) Regulations 2011, Regulations 13, 19 and 20(6).
2	Copy completed notice to the CSU York Transactions Team by email (access contact details, Chapter 1, page 1-5).
3	Complete form IMP 8/1 as fully as possible. Email the completed form to Operations (contact details as above), then send it by post to Operations, Food Standards Agency, York. **Reference**: See chapter 9 on 'Forms' for form IMP 8/1. Operations will inform the relevant technical and policy team(s).
4	Operations will notify the OV if further information is required. For example, photographs, copies of commercial documentation.
5	Take relevant photographs wherever possible and email or post these to Operations.
6	Once the OV has clarified whether the product constitutes an unchecked consignment, they should await an FSA policy decision via Operations. Operations cascades the information to the OV, so that the OV may: • allow the consignment to be used as an animal by-product in accordance with Regulation (EC) 1069/2009, provided there is no risk to human or animal health • permit the person in charge of the consignment to re-despatch the product outside the Community from the same BCP, to a destination agreed with the person responsible for the consignment, using the same means of transport, within 60 days, or • if the person responsible for the consignment gives immediate agreement, re-despatch is impossible or the 60 day time limit has elapsed, destroy the product. Where the FBO refuses to deal with the consignment in accordance with the OV's instructions, the OV may formally seize the consignment in accordance with the Trade in Animals and Related Products Regulations 2011 (and equivalent legislation in Wales), and require it to be disposed of, consigned outside the EU, or destroyed under the same conditions as above. An importer whose products are liable for seizure may also have breached Regulation 13 and 16 of TARP 2011 in England and Wales. **Reference**: See chapter 7 on 'Enforcement' for additional information.
7	Details of any non-conforming products or illegally imported products from third countries must be sent to Defra, Scottish Government or Welsh Government, as appropriate. Use the IIT1 form- see page 4-10 of this Chapter for details of where to obtain the form and where to send it once completed.
8	Confirm with Operations when the consignment has been disposed of, released or returned. **Reference**: See 2.5.17 on 'Disposal of unsatisfactory consignments' in this section for additional information.

2.5.15 Unsatisfactory consignments: animal health

A consignment may be considered unsatisfactory:

- if the presence of an agent responsible for a notifiable disease is detected

- if any cause likely to constitute a serious hazard to humans or animals is present
- that uncertified product comes from an area infected by an epizootic disease.

Examples:

- consignments imported from countries or regions that are not permitted due to disease outbreaks
- meat from FMD vaccinating countries.

Defra and APHA take responsibility for all animal health aspects of imports.

OV action:

The OV is to take the following action in the event of an unsatisfactory consignment due to an animal health issue.

Note: Operations will advise the OV in writing, by e-mail, of the action required for any unsatisfactory meat.

Official veterinarian action

Step	Action
1	Detain the meat until further advice is given by APHA via Operations. **Meat from other MS:** Detain under the Food Hygiene (Wales) Regulations 2006, Regulation 23 or 9(5) – form ENF 11/1 or ENF 11/26 / Food Safety and Hygiene (England) Regulations 2013, Regulation 25 or 10(1) – form ENF 11/1 or ENF 11/26 respectively. **Meat from a third country:** Where the meat has entered the UK through the appropriate BCP and following appropriate checks has been released onto the market, non-compliant meat should be detained using domestic powers as set out above.
2	Copy completed notice to the CSU York Transactions Team by email (access contact details in chapter 1 on 'Introduction').
3	Complete form IMP 8/1 as fully as possible. Email the completed form to CSU York Transactions Team (contact details as above), then send it by post to Operations, Food Standards Agency, York. **Reference**: See chapter 9 on 'Forms' for form IMP 8/1.
4	APHA contacts Operations when a decision is made on the future of the consignment. Operations cascades the information to the OV, so that they may release it for human consumption or: **From MS:** require destruction of the consignment as an ABP. If the FBO refuses, serve an ENF 11/12 to require its disposal. **From third countries:** require destruction of the consignment as an ABP, or any other appropriate measures necessary to protect human or animal health. **Reference**: See chapter 7 on 'Enforcement' for additional information and chapter 9 on 'Forms' for the ENF notices.
5	Details of any non-conforming products or illegally imported products from third countries must be sent to Defra, Scottish Government or Welsh Government, as appropriate. Use the IIT1 form: see topic 4.3.2 on 'Unsatisfactory consignment from third country: OV action' in this section for details of where to obtain the form and where to send it once completed.
6	Confirm to Operations when the consignment has been disposed of, released, or re-despatched. **Reference**: See 2.5.17 on 'Disposal of unsatisfactory consignments' in this section for additional information.

2.5.16 Unsatisfactory consignments: SRM

The steps below explain the OV role when SRM is identified.

Note: Operations will advise the OV in writing, by fax or e-mail, of the action required for any unsatisfactory meat.

Reference: See section 2.4 on ‘Additional duties for imported beef’ in this chapter for additional information.

Step	Action
1	Inform the FBO of the situation and ensure the entire consignment is unloaded and inspected.
2	**Consignments from other MS:** Detain the product under the Food Hygiene (Wales) Regulations 2006, Regulation 23 or 9(5) / Food Safety and Hygiene (England) Regulations 2013, Regulation 25 or 10(1) – form ENF 11/1 or ENF 11/26 respectively – until the FSA decision is given. **Consignments from third countries:** Detain the product under Regulation 2017/625, Article 66.1 - form ENF 11/32.
3	Copy completed notice to Food Incidents Team and Imported Food Team by email or fax (access contact details in chapter 1 on ‘Introduction’).
4	Complete form IMP 8/1 as fully as possible. Email or fax the completed form to the Food Incidents and Imported Food teams (contact details as above) then send by post to the Food Incidents and Imported Food teams. **Reference**: See chapter 9 on ‘Forms’ for form IMP 8/1.
5	Email or fax copies of commercial documentation, where available, to the Food Incidents and Imported Food teams.
6	Take relevant photographs and email or post to the Food Incidents and Imported Food teams.
7	The Food Incidents Team and / or the Imported Food Team will contact the OV when a decision is made on the future of the consignment. The Food Incidents and Imported Food teams will cascade information to the OV, so that they can: **Consignments from other MS:** • arrange for the removal of the SRM and release the meat for sale, or • arrange for the destruction of the consignment as an ABP, setting out the appropriate method of disposal; serve an ENF 11/12 in the event that the FBO refuses to dispose of the consignment (See chapter 2.8 on ‘Animal by-products’ for additional information) **Consignments from third countries:** • where health conditions permit, require the re-despatch of the product outside of the European Union, from the same BCP to an agreed destination, using the same means of transport, within a maximum time limit of 60 days, or • destroy the product in accordance with Regulation (EC) 1069/2009 and the domestic ABP Regulations.
8	Details of any non-conforming products or illegally imported products from third countries must be sent to Defra, Scottish Government or Welsh Government, as appropriate. Use the IIT1 form: see topic 4.3.2 on ‘Unsatisfactory consignment from third country: OV action’ in this section for details of where to obtain the form and where to send it once completed.
9	Confirm to the Food Incidents and Imported Food teams when the consignment has been disposed of or released. **Reference**: See topic 2.5.17 on ‘Disposal of unsatisfactory consignments’ in this section for additional information.

2.5.17 Disposal of unsatisfactory consignments

Permitted disposal routes:

APHA will be able to advise on the approval status of plants receiving all categories of by-products from approved establishments, or see: Guidance for the ABP industry on GOV.UK

Reference: See chapter 2.8 on ‘Animal by-products’ for additional information.

Despatch

To prevent diversion of unfit consignments back into the human food chain, the OV must supervise the despatch of such consignments to approved rendering sites. The product must be removed from the establishment as detailed in this section, depending on the category of ABP.

Category 3 animal by-product:

It may be possible for disposal at an approved petfood plant as a Category 3 ABP. In such a case the OV is to:

- check the consignment is sent to an approved (registered) plant
- obtain an estimate of the weight of by-product despatched
- obtain confirmation of receipt at the pet food plant

Note: this may require liaison with a LA; contact Operations for assistance in making arrangements

- forward a copy of the receipt by email or post to Operations

2.6 Checks on imported live animals

2.6.1 General conditions and checks applicable to live animals entering GB from EU MS

Importers are required to give at least 24 hours’ notice in writing to the APHA office responsible for the place of destination of the animals of their intention to import from another MS.

The Notice should state:

- name, full postal address and telephone number of the importer
- name, full postal address and telephone number of the place destination
- date and time of arrival at place of destination
- details of the animal(s) being imported including quantity, breed, sex, passport number (if applicable), name (if applicable)
- name and full postal address of the premises of origin where the animal(s) are being imported from
- signature and date

Reference: The Trade in Animals and Related Products Regulations 2011- Part 2 (England and Wales).

The animals must be taken directly to the place of destination which must be the place of destination given on the export health certificate. The appropriate health certificate must accompany the consignment to its place of destination where it must be retained by the consignee for a minimum period of 12 months. The route plan or animal transport certificate must also accompany the consignment.

All consignees must, before the consignment is divided up or subsequently marketed:

- check either that each animal is identified and that they are accompanied by certification in accordance with community or national rules, or

- notify APHA of any irregularity or anomaly in either identification or in certification of the animals, or
- where an irregularity or anomaly in the certification is found, isolate the animals or products in question until a veterinary inspector has authorised their release in writing

2.6.2 General conditions and checks applicable to live animals entering Great Britain from a third country

Note: For background information only – this relates to the work of Portal OVs.

The following conditions apply in respect of animals originating in a third country which are either imported directly into Great Britain or are imported via another MS:

- live animals may only be imported into Great Britain through an approved BCP, which must be approved to handle the category of animal being imported; further information is supplied on Defra's website
- importers must provide one working day's advance notice in writing (email is acceptable) to the APHA official responsible for the BCP, of their intention to import; they must include the information contained in Part 1 of the CHED
- under Regulation (EC) 1/2005 and the Welfare of Animals (Transport) (England) Order 2006 and the Welfare of Animals (Transport) (Wales) Order 2007, importers must comply with the rules of animal welfare during transport
- on arrival, the animal(s) must be conveyed directly to the BCP where they will be subject to documentary and identity checks and, in most cases, to a physical examination
- importers must notify the APHA official responsible for the BCP if, for any reason, the arrival of a consignment is cancelled, postponed or delayed
- the animals will not be permitted to leave the BCP or the HMRC clearance area, except with a CHED provided by the Portal OV, confirming that all the veterinary checks have been carried out; the animals must be taken directly to the place of destination which must be the destination given on the CHED
- on arrival at the destination after leaving the BCP, animals for breeding and production may not be moved from the establishment unless authorised in writing by APHA

2.6.3 General conditions and checks applicable to live animals entering GB from a third country via other MS

The following conditions apply in respect of animals originating in a third country which are imported into Great Britain via another MS and where the veterinary checks at a BCP have been carried out in the MS of entry.

- The animal must, on arrival in Great Britain, be accompanied by a CHED and an authenticated copy of the original health certificate, issued by the Portal OV of the BCP. These documents must be retained by the consignee for at least 12 months and be made available, on request, to an officer of Defra, Scottish Government, Welsh Government or LA.
- Importers must notify APHA, in writing (email is acceptable), at least 24 hours in advance of the expected date of arrival in Great Britain. Details provided must include the nature of the consignment and the anticipated arrival date.

2.6.4 Imported cattle identification

All cattle born or imported (not direct to slaughter) into GB since 1 July 1996 must be registered with British Cattle Movement Service (BCMS) within 15 days of arrival at the holding. They must be moved to the licensed slaughterhouse accompanied by an official GB passport.

For imported animals with BCMS-issued passports, the passport will provide details of the country from which the animal was imported.

Direct to slaughter: MS

All cattle imported from EU MS or from Northern Ireland, Isle of Man or the Channel Islands and sent direct for slaughter must be accompanied by:

- a passport issued by the MS or island authority
- an export health certificate
- a Permit Authorising Movement of Cattle (BT1) issued by DAERA (for cattle from Northern Ireland only)

Direct to slaughter: third countries

Animals imported since 1 July 1996 from third countries, will be accompanied by a GB passport unless they are presented for slaughter within 15 days of import, in which case they will be accompanied by an export health certificate.

FSA action

Chapter 2.5 on ‘Animal identification’ sets out all FSA action required including:

- FSA responsibilities in relation to checking cattle ID
- action to take when cattle are not properly identified

2.6.5 Cattle from EU MS and countries with a controlled or undetermined BSE risk

Cattle imported live from all EU MS and countries with a controlled or undetermined BSE risk are subject to SRM controls when slaughtered in GB. These controls may vary from those for cattle born, reared and slaughtered in the UK and involve the removal of additional SRM from the carcase.

Example: Vertebral column in an approved cutting plant.

Reference:

(EC) 999/2001 (as amended), Annex IX, Chapter B on Imports of bovine animals.

Commission Decision 2007/453/EC for lists of countries or regions by BSE risk category.

2.6.6 Cattle from the Isle of Man and the Channel Islands

Cattle imported live from the Isle of Man and the Channel Islands are subject to the same SRM controls as the UK.

2.6.7 Welfare issues for imported animals

Resting

The animals may be rested prior to slaughter, provided that the health certificate is valid at the date of slaughter.

Legislation

- Regulation (EC) 1/2005 and

- The Welfare of Animals (Transport) (England) Order 2006, or
- The Welfare of Animals (Transport) (Wales) Order 2007 (WATO).

Documentation required during transportation

The person transporting animals must carry with them documentation stating:

- the origin of the animals and their ownership
- the place, date and time of departure
- the intended destination
- the expected duration of the intended journey

which must be made available to the CA on request.

Reference: (EC) 1/2005, Article 4, Paragraph 2.

OV duties

The OV should check that consignments have been transported in accordance with the legislation quoted above.

The OV at the slaughterhouse should carry out checks as part of their animal welfare inspections under Regulation (EU) 2017/625 to ensure that water and feeding intervals, journey times and resting periods comply with Regulation (EC) 1/2005, Annex I, Chapter V.

A model document setting out the journey details that must be recorded is contained in Regulation (EC) 1/2005, Annex II.

Note: Journey time begins when the first arrival is moved. A ‘long journey’ will be any journey exceeding 8 hours.

Additional provisions relating to long journeys are contained in Regulation (EC) 1/2005, Annex I, Chapter VI. Certain derogations from these provisions exist for journeys less than 12 hours.

Reference: WATO, Part 3.

Where the haulier breaches these provisions, the OV should refer such matters to APHA / LA.

Reference: See chapter 2.3 on ‘Animal welfare’ for additional information.

2.6.8 Incorrect certification or identification of imported animals

Confirmation to APHA

All the animals that are imported must be accounted for.

The OV should confirm to APHA that all the animals certified have arrived and have been slaughtered.

Unidentified animals

If the OV identifies that imported animals are accompanied by incorrect certification or cannot be readily identified, the animals must not be slaughtered, and they must immediately notify APHA, who will arrange for the animals to be examined by a VO.

Reference:

(EC) 853/2004, Annex II, Section II, Para 2(a) and Annex III, Section I, Chapter IV, Para 3
The Trade in Animals and Related Products Regulations 2011
The Trade in Animals and Related Products (Wales) Regulations 2011

APHA action

After examination, the APHA VO will either certify that the animals are:

- fit to be slaughtered and used for their intended purpose, or
- by notice in writing served on the person in charge of the animals, require the animals to be slaughtered and destroyed or re-exported (in exceptional circumstances), in each case at the expense of the importer.

Reference:

The Trade in Animals and Related Products Regulations 2011, Regulations 5 and 15

The Trade in Animals and Related Products (Wales) Regulations 2011, regulations 5 and 15

Disease Control (England) (Wales) Order 2003.

2.6.9 Detained animal arrangements

The various methods of detention available to the OV are detailed in chapter 7 on ‘Enforcement’. To summarise, detention is possible under:

- the Food Hygiene (Wales) Regulations 2006, Regulation 9 (5) / Food Safety and Hygiene (England) Regulations 2013, Regulation 10 (1) for consignments from other MS (form ENF 11/26 – Detention Notice)
- The Trade in Animals and Related Products Regulations 2011 and the equivalent in Wales, Regulation 20(6) for unchecked consignments from third countries (form ENF 11/33 Seizure and Detention Notice)

Protocol

As best practice, the OV and the FBO should agree a detention procedure within the establishment.

3. Exports

In this section

3.1 Introduction

3.1.1 Purpose

For commercial purposes, FBOs may decide to trade their products outside of the UK.

It is the duty of the FBO to ensure compliance with all relevant legislation and/or other requirements regarding production of meat and meat products for export.

Depending on the country of destination and the type of product, the FBO may be required to put additional measures and controls in place regarding production of meat eligible for export.

3.1.2 EU Exports

EU trade is the movement of products to EU countries and Northern Ireland (NI). Meat and other products of animal origin (POAO) can be placed on the EU market provided they:

- have been produced in an approved meat establishment that is also listed as approved to export POAO to the EU (see Businesses approved to export to the EU)
- have been produced in compliance with the requirements of the appropriate EU Export Health Certificate
- have been subject to the official controls in retained Regulation (EU) 2017/625; and
- comply with any exceptional requirements and are not subject to specific restrictions.

Movement of meat and meat products to the EU and NI must be accompanied by an official Export Health Certificate (EHC)

Internal movement of meat and meat products within Great Britain (GB), to be exported to the EU, is generally accompanied by a Support Health Attestation (SHA).

3.1.3 Non EU exports

Meat and products of animal origin intended for export to Non-EU countries must comply with assimilated EU legislation, unless otherwise requested by the authorities of the importing country or established by the laws, regulations, standards, codes of practice and other legal and administrative procedures as may be in force in the importing country.

Any additional specific requirements of the importing country, as agreed between Defra and the importing competent authority, must also be adhered to. The specific requirements differ between countries and type of product. It is the exporter's responsibility to be aware of and comply with any extra requirements.

Such additional requirements may include the specific approval of the establishment ('site-specific approval'), continuous compliance with the requirements of the approval, and certification issued by the CA.

3.1.4 Competent Authorities

In the UK, competent authorities work together to safeguard public, animal and plant health, to promote animal welfare and protect consumers. Their activities are coordinated and they co-operate with each other in order to ensure that there are no gaps in delivery. The UK's system of official controls is described in the UK's Multi Annual National Control Plan (MANCP).

1. Defra is the Central Competent Authority for policy development and policy delivery in relation to exports and is responsible for the negotiations and agreements with the Competent Authorities of the importing countries regarding requirements for UK exporters.

Defra is also responsible for liaising with individual FBOs which are due to be inspected by the importing country representatives and liaising with them to identify any requirements following an inspection. This includes communication to FBOs of any remedial actions required to secure approval and notifying establishments if their approval to export to any country is to be suspended or revoked.

On behalf of Defra, FSA (FSS in Scotland and DAERA in Northern Ireland) assess compliance of establishments with the requirements of the importing country and make formal recommendation to Defra on whether an establishment should be recommended as eligible to export the relevant meat commodity to the specific country. Defra reserves the right to put forward an establishment for listing by the importing country or to de-list establishments for export. There is a Roles and Responsibilities document setting out the roles and responsibilities for the export of products of animal origin amongst Defra, APHA, FSA, FSS and DAERA. FSA has a memorandum of understanding (MOU) setting out the day-to-day working relationship with FSS in Scotland and a Service Level Agreement (SLA) for the provision of official controls services in slaughterhouses and cutting plants with DAERA in Northern Ireland.

2. APHA is an executive agency of Defra and the first point of contact for FBOs in Great Britain wishing to apply for listing as an exporter for a particular country. The APHA Centre for International Trade (CIT) is also responsible for the delivery of Export Health Certification. which must accompany exports of POAO to other countries, issuing export health certificates (EHC) to exporting FBOs for individual consignments.

They are also responsible for appointing qualified certifying OVs (in England, Wales and Scotland) who have completed the required training modules (Official Controls Qualification (Veterinary) OCQ(V)) to inspect export consignments and ensure that the EHC is completed correctly.

APHA contact details can be found online.

A list of practices with qualified OVs to inspect consignments and complete EHCs can be found online.

3. FSA is the central competent authority for food, feed safety and hygiene policy in England, Wales and Northern Ireland, and with regards to exports, is responsible for:

- Verifying that the plant intending to export is compliant with domestic and assimilated legislation.
- Establishing and maintaining a transparent and ongoing programme of export approval inspections and audits of meat establishments and standalone cold stores that require competent authority approval for specific non-EU export requirements.
- Providing conclusions and recommendations on Non-EU export audits to assess continuous compliance with the importing country requirements.
- Notifying Defra when the outcome of a FBO audit (see Chapter 4) provides evidence of unsatisfactory compliance in exporting premises (for example, ‘Improvement Necessary’ or ‘Urgent Improvement Necessary’).
- Notifying Defra when the outcome of an audit against Non-EU export requirements provides evidence of unsatisfactory compliance.
- Notifying Defra of progress on FBOs corrective actions and confirmation when such actions have been completed to a satisfactory level.
- Promoting/providing training to OVs working on behalf of FSA on compliance with export requirements.
- Verifying that OVs working in exporting plants are fully familiar, competent and effective in implementing FSA procedures for verification of export compliance in accordance with the FSA export guidance set out in the MOC.

3.1.5 Inward inspections from Non-EU countries

Importing countries visit the UK to conduct inspections at establishments which export, or wish to export to that country, to assess the controls in place.

In preparation for an inward inspection, Defra will issue a **Core Script** advisory document to assist both FBOs and competent authority officials in approved establishments. Defra holds this document and modifies it depending on the country and commodity concerned. OVs should consult this document and make it available to the FBO when first advised of a potential inward inspection. These visits fall into the following categories:

Systems audit

This involves assessment of UK wide national controls in place for meat hygiene, animal health, disease control, welfare, animal by-products, TSEs, import controls. It involves an in-depth assessment of the competent authority, structures, controls, legislation, and its implementation. It will include visits to competent authority offices, farms, laboratories, border control posts, as well as approved meat establishments. The choice of establishments to be inspected may be pre - selected by the visiting inspection team rather than the Competent Authority.

A successful outcome will result in the competent authority being granted permission to approve establishments for export to that country.

Site-specific premises approval by a Non-EU country

Updated [This involves some/all of the above assessments, but the meat establishments/standalone cold stores visited will be those wishing to obtain approval to export to that country. A successful outcome will result in only those establishments inspected by the importing country being approved for export.]

Study Visit

Updated [This occurs when the UK is seeking to access a new market and the importing country decides to conduct a study tour to focus in detail on certain aspects of the UK control systems. No approvals are given at this stage.]

3.2 Non-EU country approval

3.2.1 Site specific approval

Some non-EU countries require compliance with specific requirements, therefore, a site-specific approval is required.

Updated [It is the exporter’s responsibility to obtain any site-specific approval required by the importing country before export takes place. Approval inspections will vary depending on the importing country and may be carried out by officials from the importing country, or by the FSA Officials, who will recommend the site for approval to Defra.]

The FBOs should register their interest in specific country approval through APHA Centre for International Trade (CIT) in Carlisle (exports@apha.gov.uk or 03000 200 301).

The following countries and commodities require establishments to obtain a site-specific approval prior to export:

Country Site-Specific Approval

Pork	Beef/ Lamb	Poultry
USA	Singapore (beef)	Eurasian Customs Union
South Korea	Japan (beef/lamb)	South Korea
Japan	China (beef)	Japan (heat processed poultry meat)
China	USA (beef /lamb)	-
Australia	-	-
Mexico	-	-

Some of these countries require approval of all sites in the food chain, including stand-alone cold stores, whereas others require approval of the slaughter / cutting sites only (for example, Singapore). Specific APHA issued Notes for Guidance (NFG) should be consulted in each case before certification is issued. These can be found online.

Updated [Standard Operating Procedures (SOPs) are essential where specific approval is required for export. SOPs should meet the requirements of the particular country for the required products to be exported from intake to dispatch and should be reviewed when there is a change or, at least, once a year. SOPs should be authorised, signed and dated by the FBO before production for export commences. FBOs should train their staff on the SOPs and monitor and verify that they are effectively implemented. SOPs should be regularly verified by the FSA.

Required Methods of Operation Procedures (RMOPs) are also required for certain countries such as USA and Canada (in the case of Precursor Material of bovine origin or Finished Raw Ground Beef Product), where specific operational conditions must be met. The RMOP is a formal version of an SOP and needs to be signed by the FBO, the site OV and the FSA representative, which will be either the FVL or FVC.]

Note: All the establishments receiving new export approval visit must first be fully approved by the competent authority (FSA or LAs)

3.2.2 Listing of establishments

Updated [Some countries, such as the Republic of South Africa and Canada, only require premises and commodities to be formally listed on the website of the competent authority in those countries before exports can commence. These countries accept domestic equivalence and **do not require site-specific approval**; however, in order to demonstrate compliance with domestic requirements, their last FBO audit outcome must be either ‘Good’ or ‘Generally Satisfactory’ in FSA approved establishments, or compliant in their latest food hygiene inspection in establishments under the Local Authorities (e.g., stand-alone cold stores). The FSA website can be consulted for the most up to date audit categories. A list of the current audit outcomes is available at the following link: Meat Establishment Audits (food.gov.uk)]

It is essential that in all of the above cases, any change to FBO trading name and details is notified to APHA CIT to avoid rejection of consignments on arrival. If FSA becomes aware of a change that has not been notified, the FSA official can notify APHA CIT making sure that the FSA Exports Team is also informed.

The requirement for an establishment to be listed on a country website will be detailed in the associated APHA issued Notes for Guidance for that country and should be consulted in all cases prior to export.

3.2.3 Summary of process for Non-EU country exports approval

Step	Action

1	The FBO contacts APHA Centre for International Trade (CIT) in Carlisle to apply for approval to export to a specific country (exports@apha.gov.uk)
2	APHA CIT Product Exports Team sends the application form to FSA Exports Team, copied to Defra Market Access Team, who log this on their 'Approval Tracker' spreadsheet.
3	The FSA Exports Team checks the most recent FBO audit report (AUD 9/3); establishments with audit outcomes of "Improvement Necessary" and "Urgent Improvement Necessary" are not eligible for approval to export to another country. In case of stand-alone cold stores, the FSA Exports Team checks the levels of compliance in the most recent food hygiene inspection carried out by the Local Authorities.
4	FSA Exports Team writes to the applicant setting out the specific export approval process, requirements and costs, seeking written confirmation that they understand these and wish to continue (which forms the basis of their contract with the FSA to carry out this non-regulatory work).
5	If the establishment confirms they are content to continue, FSA Exports Team forwards this confirmation to FSA Approvals Team asking for them to process the application. FSA Approvals Team will allocate the application to the FVL who will contact the FBO for them to get ready for an export approval assessment.
6	The export approval inspection visit is carried out by the FVL. FVLs and FVCs must be confident with the export requirements as well as colleagues from the SDP (OVs and AMs/TMs working in the plant wishing to export). The approval in slaughterhouses, cutting plants and cold stores will follow the steps described below: 6.1 Slaughterhouses • The FVL will make initial contact with the FBO and the site OV to discuss the approval process and, if necessary, will carry out an advisory visit to discuss the export requirements involving the OV / AMs / TMs from the onset • The FVL will provide the required check-lists and other relevant documents such as Notes for Guidance (NFG) and EHC to the OV for familiarisation • Once the FBO has produced the SOPs (SSOPs, RMOP if required) for export to the particular country and has agreed them with the OV, a trial implementing the new procedures will be carried out by the FBO under the OV's supervision • The OV will keep the FVL / FVC informed of the progress and the FVL / FVC will assist the OV during the process • The FBO will contact the FVL for an approval visit; the FVL will visit the plant and will make a professional judgement based on reality checks carried out on the day of the visit and on the trial carried out with the OV prior to the visit. 6.2 Cutting plants / Cold stores • The FVL will make initial contact with the FBO to discuss the approval process and, if necessary will carry out an advisory visit to discuss the export requirements • If the establishment is under Local Authority (LA) jurisdiction (not approved by FSA), the FVL, with the help of the Exports Team, will contact the relevant LA to ensure that the establishment complies with the domestic and assimilated requirements • Once the FBO has produced the SOPs (SSOPs, RMOP if required) for export to the particular country he/she will carry out a trial to confirm the new procedures can be implemented • The FBO will keep the FVL / FVC informed of the progress during the process • The FBO will contact the FVL for an approval visit; the FVL will visit the plant and will make a professional judgement based on the reality checks
7	Once the FVL is confident that the establishment complies with the domestic, assimilated and export specific requirements, the FVL will send an approval checklist with the recommendation for full approval to the Export Veterinary Leader (EVL).
8	If the establishment does not comply with the requirements, the FVL will recommend refusal of approval informing the FBO, the Exports Team, the Approvals Team and the EVL of this decision via email. The deficiencies found during the visit will be detailed on this email.
9	The EVL will assess the information and, if satisfactory, will forward it along with any other supporting documentation to Defra's Market Access Team copying the FSA Exports Team and the FSA Approvals Team.
10	The EVL will advise Defra that they make the appropriate recommendation to the authorities in the destination country.
11	Defra will send their recommendation to the relevant British Embassy or direct to the relevant authorities in the destination country.
12	Destination country authorities will make their decision on whether to approve the establishment to export, will notify Defra Market Access Team of their decision and will update the list of approved exporting establishments on their website.
13	Defra will notify the establishment and the FSA Exports Team that the destination authorities have agreed to their application for approval to export and they are now listed. FSA Exports Team will inform Approvals Team when they receive this notification
14	The plant will enter the export audit cycle at the frequency required by the importing country.

A flowchart detailing the steps for the export's approval process can be found in Annex 3.

Note: The approvals checklists are based on the domestic and assimilated legal requirements, country specific requirements and a Defra country agreed protocol. These can be provided by the Exports Team. Copies of the export approval checklists can be found in Section 4 - Annexes.

3.2.4 Maintenance of Approval – Audit and Verification Checks

FSA OVs with permanent presence in export approved premises must complete daily and weekly checklists to verify ongoing compliance with the importing country requirements (see Section 4 - Annexes). They should also be able to sign any internal movement documentation.

In addition, these premises are required to be audited against the specific country requirements, regardless of commercial activity, in order to maintain the export approval. The audit frequency is annually, semi-annually or quarterly depending on the non-EU importing country.

3.3 FBO and FSA duties in Non-EU country approved establishments

3.3.1 FBO duties

FBOs that have been approved / listed to export to Non-EU countries need to:

- Comply with the requirements of domestic and assimilated law that apply to approved meat establishments and implement food safety management systems through HACCP-based procedures.
- Comply with the specific requirements of the importing country (these will be different for different countries and commodities) and obtain specific approval and/or listing (as required).
- Notify any changes in trading name or any other relevant details to the FSA Approvals Team and to APHA CIT.
- Complete and implement Standard Operating Procedures (SOPs) and, if required, Sanitary Standard Operating Procedures (SSPOs) for the specific requirements of the importing country.
- Comply with an RMOP (Required Method of Operation) when required by the importing country (for example USA, and meat for grinding to Canada) detailing specific operational conditions that must be met by the establishment (formal version of an SOP).
- When required by the country (for example, USA) carry out a pre-shipment review; prior to shipping the product review the records associated with its production including CCPs, deviations, corrective actions, associated pre-requisites, disposal of defective products, etc. This is a ‘double check’ of the records. The reviewer must sign and date the review form.

3.3.2 FSA duties

In slaughterhouses, where there is a permanent OV presence, the OV must comply with the following requirements:

- complete specific training on the requirements for exports to the specific country
- ensure access to the updated copies of the FBO’s RMOP, SOPs and SSOPs and verify them regularly (as required by the specific country)
- verify the plant HACCP-based procedures
- complete the verification checklists as required for each particular country at the required frequency (see table below and Section 4 - Annexes)
- document issues identified, and corrective actions taken using the appropriate checklists for each particular country

- verify the pre-shipment review (when required by the importing country, for example USA)
- checks on microbiological tests carried out by the FBO including confirmation that they are using an approved lab and the required accredited testing method
- hold and have blank copies of relevant internal movement documentation, export health certificates and notes for guidance of the relevant country export requirements
- sign and retain copies of internal movement documentation.

Forms to be completed by the OV	Countries
Daily verification of FBO controls Form 10 A - Pork checklist Daily/Weekly Form 11 A – Pork checklist Monthly/Quarterly/Annually Form 10 B – Beef & Lamb checklist Daily/Weekly Form 11 B – Beef & Lamb checklist Monthly/Quarterly/Annually	USA, China, South Korea, Singapore, Australia, Japan, Mexico
HACCP- Routine Random Verification Checklist Forms 1, 1A, 2, 3, 4, 9 - Randomly 1 Direct Observation (DO) & 1 Record Keeping (RK) for each CCP at least once a week	USA
Preoperational Sanitation SOP checks Form 8 - 1 DO* & 1 RK** at least once a week	USA
Daily Operational Sanitation SOP checks Form 7- Every exporting day	USA
Random Re-inspection Checks Form 5 - Every commodity, every exporting day	USA
Monthly Random Verification Checklist- Micro testing Form 6 (Form 6A - Pork and Form 6B - Beef & Lamb) - Every time micro testing is carried out by FBO	USA, China, South Korea, Canada (beef plants with N60 sampling)
Pre-shipment Review Every consignment	USA
Exports of meat and offal to Non-EU countries: monitoring Cold Store checklist	USA, China, South Korea, Singapore, Australia, Japan, Mexico Cold Store only

Frequency	Verification Form
DAILY	Form 1A Form 5 Form 7* Form 8** Form 10A – Pork Form 10B – Beef & Lamb
WEEKLY	Form 1 Form 7* Form 8** Form 10 A – Pork Form 10 B – Beef & Lamb Cold store monitoring checklist

Frequency	Verification Form
MONTHLY	Form 6 A – Pork Form 6 B – Beef & Lamb Form 11 A – Pork Form 11 B – Beef & Lamb Cold store monitoring checklist
QUARTERLY	Form 9 Form 11 A – Pork Form 11 B – Beef & Lamb Cold store monitoring checklist
ANNUALLY	Form 11 A – Pork Form 11 B – Beef and lamb Form 3
1. After every CCP critical limit breach 2. Corrective Actions in Response to a Deviation Not Covered by a Specific Corrective Action, or an Unforeseen Hazard	Form 2
After each change in HACCP	Form 3
When conducting a pre-operational inspection to support the OVs recording their findings.	Form 7A
When routine HACCP verification tasks/events or results suggest the plant is not controlling its food safety system	Form 9

Note 1: Form 7 to be completed daily for Operational SSOPs and weekly for Pre-Operational S SOPs when Form 8 is no longer required.

Note 2: Form 8 to be completed every day/once per week depending on FBO performance for initial post approval period only until OV has confidence in FBO compliance or when OV has concerns that satisfactory FBO performance is not being maintained.

3.4 Non-EU export audits in approved establishments

3.4.1 Audits by the competent authority

On behalf of Defra, the FSA (FSS/DAERA) ensures an establishment approved for export continues to maintain the terms and conditions of the export approval.

Updated [Audits will be carried out by Export Veterinary Auditors (EVAs) or Veterinary Auditors (VAs), specifically trained on Non-EU exports. The audit report will be submitted to the Approvals Team, who will store it securely and distribute it to the FBO, FSA/LAs and Veterinary Delivery Partners (VDPS) by e-mail.]

A Non-EU exports audit report template can be found in Annex 5.

If the Auditor / OV is informed by the FBO that they would like to surrender their export approval, they should ask the FBO to notify APHA CIT in Carlisle and the FSA Approvals and Exports Teams.

The audit includes operational and systems compliance (as documented in MOC Chapter 4) and includes auditing the OV performance (in plants with permanent OV presence) to ensure that they are carrying out the required checks and completing records at the established frequency required.

Exporting stand-alone cold stores, for which compliance with domestic legislation is under the jurisdiction of LAs, are also subject to FSA export audits at the required frequency agreed by Defra with the importing country.

The length of the audit will depend on the type of establishment. Audit work includes preparatory work, on-site audit and post-audit work. During the on-site visit, the Auditor’s approach involves reality checks and documentation checks of FBO Food Safety Management Systems, including, when applicable, Animal Health and Identification, Animal Welfare, Hygiene Production,

Environmental Hygiene, HACCP based procedures, SRM controls, handling of ABP, etc. It also involves interviews with the relevant FSA officials and observation of official control activities. The evidence gathered is used to assess the effectiveness of the control systems.

The export audit is independent from the FBO audit although both can be carried out together if coincidental in time.

Auditors can access the scheduler through the K2 system to organise the export audits.

For FSA approved establishments newly approved to export to the USA, monthly audits are required during the first 3 months and, once satisfactory standards have been demonstrated, the frequency reduces to quarterly audits.

China and Eurasian Customs Union require quarterly audits whilst South Korea, Singapore, Australia, Japan and Mexico require annual audits, except heat processed poultry meat to Japan, where the audit frequency is twice a year. This frequency must be kept in order to maintain the export approval regardless of commercial activity.

Audit frequency

Monthly	Quarterly	Yearly	Semi-annually
USA (first three months)	USA (after first three audits)	Singapore	Japan (heat processed poultry meat)
-	Eurasian Customs Union	South Korea	-
-	China	Japan	-
-	-	Australia	-
-	-	Mexico	-

3.4.2 Non-compliances

Deficiencies found during the audit should be reported by the FSA auditor as ‘lapse’ or as ‘non-compliance’.

Definition of compliant, non-compliance and lapses:

Compliant - food business is operating in accordance with its food safety management systems, food safety standards and has met the requirements of the EU and importing country regulations.

Lapse - not likely to compromise public health (including food safety) or animal health or welfare or lead to the handling of unsafe or unsuitable food. A lapse is an isolated low risk situation and does not compromise achieving control measures of the food safety program.

Non-compliance - likely to compromise export trade, public health (including food safety) or animal health or welfare or may lead to the production and handling of unsafe or unsuitable food if no remedial action is taken.

Lapses and non-compliances identified during the audit are discussed between the auditor and the FBO during the closing meeting at the end of the audit. The audit report contains a Corrective Action Report (CAR) listing the deficiencies identified.

The FBO must complete the CAR and submit it to the site OV and the auditor within 10 working days of receiving the report. The CAR must address the following for each deficiency:

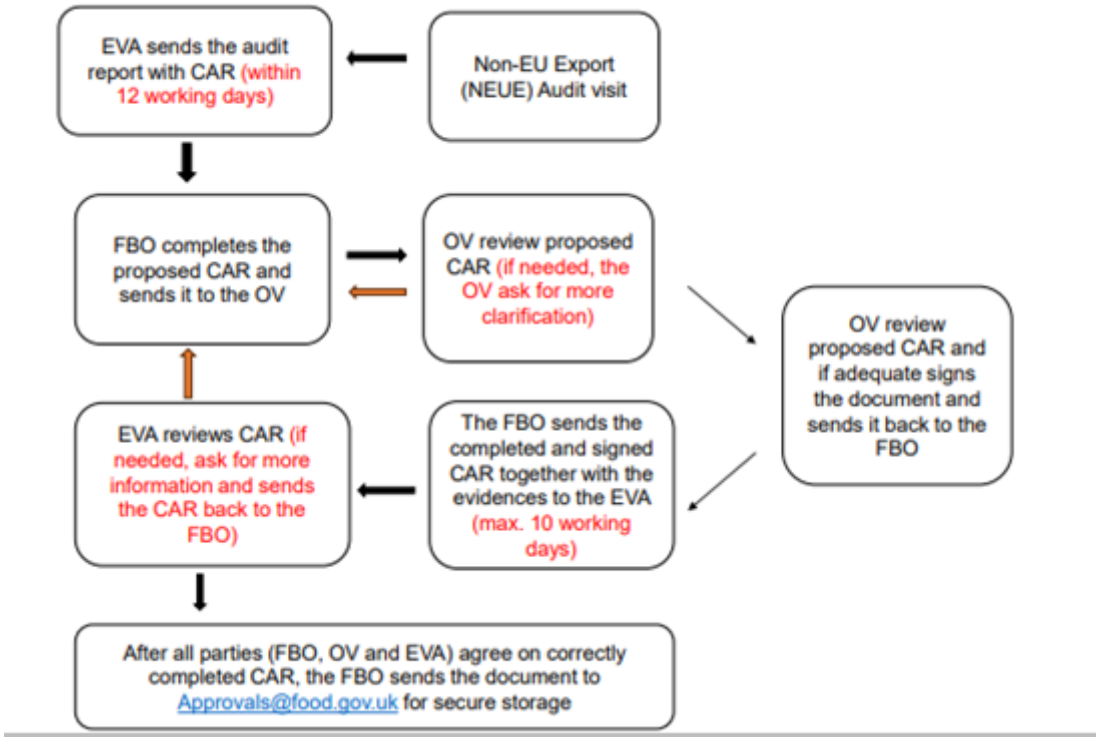
- Immediate action taken to resolve the issue, including if applicable, adequate disposition of product that may be contaminated.
- Root cause of the deficiency.

- Corrective action: measures taken to address the root cause including monitoring and verification procedures put in place to ensure that those measures are effective
- Preventative action
  Where deficiencies cannot be corrected immediately:
  - Long term corrective action planned.
  - Control measures and monitoring procedures in place to deal with hazards introduced in the meantime.
  - Time scales for long term corrective actions.
-

If the FBO does not provide a corrective action report within the agreed 10 days, the auditor will have to contact the FBO in writing, to remind them of the requirement to provide evidence of the corrective actions they intend to implement.

In plants with an on-site FSA OV, the OV is responsible for verifying the corrective actions taken by the FBO and completing the "CA verification" column of the CAR.

In stand-alone cutting plants and cold stores, the responsibility falls with the auditor.



The diagram above defines the submission of the Corrective Action Report (CAR). Steps:

- Non-EU Export (NEUE) Audit visit
- EVA sends the audit report with CAR (within 12 working days)
- FBO completes the proposed CAR and sends it to the OV
- OV review proposed CAR (if needed, the OV ask for more clarification)
- OV review proposed CAR and if adequate signs the document and sends it back to the FBO
- The FBO sends the completed and signed CAR together with the evidence to the EVA (max. 10 working days)
- EVA reviews CAR (if needed, ask for more information and sends the CAR back to the FBO)

- After all parties (FBO, OV and EVA) agree on correctly completed CAR, the FBO sends the document to Approvals@food.gov.uk for secure storage

Breaches of the domestic legislation will lead to the hierarchy of enforcement being followed as per FSA procedures. Since compliance with domestic and assimilated law is a minimum requirement to export, failing to address non-compliances in a timely manner could result in a recommendation to Defra to suspend the export activity and / or de-listing from the importing country approved establishments list (for example when the FBO audit has an outcome of 'Improvement Necessary or 'Urgent Improvement Necessary).

Breaches of the importing country specific requirements will follow a similar enforcement hierarchy and export will cease until compliance can be guaranteed. The ultimate sanction for non-compliance with export requirements would be the recommendation to Defra to remove / suspend the establishment's ability to export (de-listing). It is ultimately Defra's decision to remove/suspend an establishment to export. In some cases (for example USA exports) this will be preceded by a Notice of Intention to De-list (NOID) and an increase in the frequency of audits and inspections.

Approval and audit documents for each establishment will be stored securely by FSA Approvals. Audit reports can be found on the plant files in SharePoint.

3.5 Training for Authorised Officers on non-EU exports

3.5.1 Introduction

This section details the process and the requirements to be fulfilled in order for a veterinarian or inspector to work and / or supervise as an Authorised Officer (AO) in an exporting plant.

Authorised Officers (AOs) working and / or supervising exports in an establishment approved to export to Non-EU countries need to be specifically trained on the country's requirements.

3.5.2 Background

The overall FSA lead in exports to Non-EU countries reside in the Exports Team based in the International and UK Affairs Directorate, and in the Export Veterinary Auditors team (EVA) based in the Operational Delivery Directorate.

The Export and EVA teams lead on the delivery of Non-EU export related matters on behalf of the FSA.

OVs appointed in establishments exporting to Non-EU countries, in addition to the general NOV training programme and OV inductions, receive specific training on export requirements of the specific Non-EU countries their establishment is approved for.

All UK veterinarians are required to complete Continuing Professional Development (CPD) related and suitable to their work.

3.5.3 Specific training on Non-EU exports

New Authorised Officer (AO) training: when an AO starts working at an exporting plant, for example on USA approved premises, their line manager is responsible for ensuring that they are fully trained before they are deployed to work at this establishment. This training is provided by their line manager with the support of the EVA team and experienced AOs. This training will be also required for relief AOs covering exporting establishments in advance of deployment to the site. The training consists of:

- Theoretical training: ahead of attending the plant, the AO is provided with links to all relevant legislation, instructions and updates. Also, relevant available presentations are shown and discussed with the AO.
- Practical training: the AO shadows the resident AO on hygiene inspection and auditing (pre-ops, CCPs, SPSs and SSOPs), Pre-shipment Checks Supervision and Certification Procedures, and Antemortem and Post-mortem Procedures.

Self-learning: AOs involved in export work are encouraged to utilise the available resources to keep up to date with their knowledge:

- Regulations for that specific country (e.g. FSIS directives for exports to the USA), Export Health Certification requirements set out in the Notes for Guidance (NFG) issued by the Animal and Plant Health Agency (APHA) for each specific country, export approval check-lists detailing the most relevant requirements, audit check-lists, etc.
- MOC Chapter 3 which covers all the relevant and updated information regarding exports, including Inward Missions, Approval process, Audit procedures and completion of specific forms
- FSA SharePoint where the most recently updated information on export requirements is available (for example, FSIS requirements and directives, audit reports, USDA forms).

FSA training: this is provided to AOs through training material, updates and cascading of information. The aim of this training is to ensure that all AOs working in exporting plants are trained on the particular requirements of the specific country.

Training and updates are also delivered at the quarterly FSA VA and FVL meetings, where there is a standing item of the agenda dedicated to exports.

The EVAs and the Exports Team work closely together coordinating the dissemination of briefings, updates, instructions, legislation, etc to relevant staff.

AOs working in plants exporting to the USA can receive USDA FSIS updates / digest bulletins by email directly. Relevant communications from FSIS, the US Embassy in London, Defra, APHA, the FSA Exports team and the UK Export Certification Partnership (UKEC) are communicated and cascaded to all the relevant AOs.

The knowledge of the AOs working at the exporting plants is assessed during Non-EU export audits and recorded in the ‘OV performance’ section of the audit report.

This assessment identifies particular training needs, that will result in regular training updates and the indication of any specific technical training required.

3.6 APHA authorisation for certification

3.6.1 Authorisation of OVs

Export health certification is carried out by appointed OVs on behalf of APHA.

The authorisation of OVs to sign Export Health Certificates is different from the authorisation of OVs under The Food Hygiene (Wales) Regulations 2006 / The Food Safety and Hygiene (England) Regulations 2013 to enforce assimilated Regulation (EU) 2017/625.

Training and authorisation of OVs for export purposes must be arranged with APHA and is provided in the UK by a contracted training provider (Improve International).

Note: OVs must not complete export health certificates unless they have completed the required APHA training modules and are authorised to do so. If in doubt, the OV should seek technical

guidance from their line manager or APHA.

3.6.2 Internal movement documents

When the export health certification takes place at an establishment at the end of a chain of movements through different establishments, a certifying OV needs support certification issued by the OVs from previous establishments that have handled the product to ensure that full food chain information is checked.

There are three types of internal movement documents: the Internal Movement Certificate (IMC), the Support Health Attestation (SHA) and the Veterinary declaration. The OV signing internal documents does not need to be appointed by APHA.

Internal Movement Certificate: is a veterinary declaration confirming the meat referred to in the consignment complies with the import conditions of the country of destination. IMCs are agreed by Defra and the importing country for movement of product within the UK in order to facilitate the eventual export health certification [e.g. China – pig meat (7006EHC/IMC); Australia – fresh pig meat intended for further heat treatment (6838EHC/IMC); Canada – fresh beef (7833EHC/IMC)].

Support Health Attestation: a veterinary declaration confirming the meat referred to in the consignment comply with the import conditions of the country of destination, used for any country where IMCs are not applicable (e.g. exports to the EU), for movement of product within the UK in order to facilitate the eventual export health certification.

Veterinary declaration: a veterinary written statement confirming that the meat complies with the export requirements. These declarations typically cover a longer period than IMCs and SHAs and can include more than one consignment. Veterinary declarations can be issued to support the certification process when there is no specific requirement for an IMC or an SHA [e.g. Republic of Congo – meat/meat products (7211EHC)].

3.6.3 Certification

Export Health Certificates (EHC) are issued by APHA. There are specific certificates for different products and destinations.

It is the exporter's responsibility to apply for certificates and ensure that they are available at the time of certification.

Specimen copies of Export Health Certificates and relevant Notes for Guidance (NFG) can be downloaded online. The EHCs are issued directly to the certifying OVs via APHA's online platform.

Alternatively, the exporter can contact APHA.

Follow the link to find a practice with OVs to sign a certificate.

The original certificate shall be completed by the OV who then has to create a copy of each EHC issued. Each copy shall be signed, stamped and the words "Certified Copy" added by the OV.

The original EHC should be presented to the importing authorities for inspection and clearance by the exporter (either electronically or physically), while the Certified Copy must be retained by the OV for their records.

Additional instructions may be found in the Notes For Guidance of each EHC.

Please be aware that there may be frequent changes to NFGs and internal movement documents, so it is of paramount importance that OVs keep their knowledge up to date and check the latest OV Briefing Notes in APHA Vet Gateway website.

4. Annexes

N.B. These pages can only be accessed by FSA staff on FSA devices.

Annex 1: Mode common veterinary document (CHED)

Annex 2: Sample document: IIP1 form

Annex 3: Third country exports approval process

Annex 4a: Cold store third country checklist

Annex 4b: Form 1 HACCP system – verification checklist – FBO monitoring and verification

Annex 4c: Form 1a HACCP system – verification checklist – FBO monitoring and verification

Annex 4d: Form 2 HACCP system – verification checklist – FBO corrective action

Annex 4e: Form 3 HACCP system – verification checklist – FBO reassessment

Annex 4f: Form 4 HACCP system – verification checklist – FBO records keeping

Annex 4g: Form 5 - random re-inspection checks

Annex 4h1: Form 6A - FBO microbiological testing verification checklist (pork and poultry)

Annex 4h2: Form 6B – FBO microbiological testing verification checklist (beef and lamb)

Annex 4i1: Form 7 – daily sanitation SOP checks (SSOPs)

Annex 4i2: Form 7A – verification of the FBO pre-operational checks

Annex 4j: Form 8 – pre-operational sanitation checks (SSOPs)

Annex 4k: Form 9 HACCP system – directed verification checks

Annex 4l1: Form 10A – daily verification of FBO controls for export

Annex 4l2: Form 10B -verification of FBO controls for export (beef and lamb)

Annex 4m: Form 11 – weekly verification of FBO controls for export - **REMOVED**

Annex 5: Third country audit report template

Annex 6: Surrender of third country approval - **REMOVED**

Annex 7a: Third country approval checklist (Australia - Pork)

Annex 7b: Third country approval checklist (Japan – Pork, Beef and lamb)

Annex 7c: Third country approval checklist (Singapore - Beef)

Annex 7d1: Third country approval checklist (USA - Pork)

Annex 7d2: Third country approval checklist (USA – Beef)

Annex 7e: Third country approval checklist (South Korea – Pork & Poultry)

Annex 7f1: Third country approval checklist (South Korea - Pork)

Annex 7f2: Third country approval checklist (South Korea – Poultry)

Annex 7g: Third country approval guidance (South Korea)

Annex 8: UK CCA Verification procedures USDA

Annex 9: RMOP for USDA FSIF certified establishments

Annex 10: RMOP for establishment exporting beef to Canada

Annex 11: E.coli Official Sampling

Annex 12: US intact beef letter

Annex 13: RMOP for USDA FSIS certified establishments (lamb)