Importing composite products

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

The EU’s 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

Commission Decision 2007/275/EC and Regulation No. 28/2012 set out import conditions for importing composite products from non-EU 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 third country listed in EU legislation as approved for the product of animal origin contained in the composite product.

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 listed on the European Commission website.

The composite product must be accompanied by the relevant health certificate in Regulation 28/2012 if they contain processed meat, milk, egg or fishery product.

Composite products containing any other animal product must be accompanied by the relevant health 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 EU 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 by the EU for milk.

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 EU and national rules in place to protect public and animal health. Importers should satisfy themselves that any composite products coming to the UK 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.

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