Composite products – Frequently Asked Questions

1. What is a composite product

“Composite Products” are defined in Article 2(a) of Commission Decision 2007/275/EC as “a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin and includes those where the processing of primary product is an integral part of the production of the final product”. For this guidance, the composites product of animal origin must be processed before being mixed with that of plant origin.

2. How are processed products defined?

These are defined in Article 2 of Regulation (EC) No 852/2004 and Point 7 of Annex I of Regulation (EC) No 853/2004 and include

- ‘primary products’ means products of primary production including products of the soil, of stock farming, of hunting and fishing
- ‘processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes
- ‘meat products’ means processed products resulting from the processing of meat or from the further processing of such processed products, so that the cut surface shows that the product no longer has the characteristics of fresh meat.
- ‘Dairy products’ means processed products resulting from the processing of raw milk or from the further processing of such processed products.
- ‘Egg products’ means processed products resulting from the processing of eggs, or of various components or mixtures of eggs, or from the further processing of such processed products.
- ‘Processed fishery products’ means processed products resulting from the processing of fishery products or from the further processing of such processed products.

Definitions of other processed products, such as rendered fats, greaves, gelatine, collagen and treated stomachs, bladders and intestines, can be found in Annex I of Regulation (EC) No 853/2004.

3. Where is the legislation laid down?

The composite products legislation is laid down in

- Commission Decision 2007/275/EC (as amended)
- Regulation (EU) No 28/2012 (as amended).
4. Has the European Commission published any guidance on composite products?


5. What rules apply to composite products containing meat products (including extracts, concentrates and powders) and/or dairy products?

- If it contains any meat product it will be subject to veterinary checks and will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed (but note the questions on country of origin below including approved residue plans);

- If it contains half or more processed dairy product it will be subject to veterinary checks and will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed (but note the questions on country of origin below including approved residue plans);

- If it contains less than half its substance of processed dairy product and does not meet the requirements of Article 6 of Commission Decision 2007/275/EC, it will be subject to veterinary checks and will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed (but note the questions on country of origin below including approved residue plans);

- If it contains less than half of processed dairy product and meets the requirements of Article 6 of Decision 2007/275/EC, it does not need to be veterinary checked and does not need to be accompanied by a health certificate. The composite product must be shelf stable at ambient temperature or it must have undergone a complete cooking or heat treatment process throughout its substance so that any raw product is denatured (this means the whole product must have been cooked/heat treated) and comply with the other requirements of Article 6 below.

Please also see the table in the Annex below.

6. Are products containing honey a composite product?

If a foodstuff contains only honey as the animal origin product, it would not be considered a composite. This is because the product of animal origin needs to be processed, which does not relate to the actions undertaken on honey, including heating to remove from the barrel.
Processing of honey could include ‘ultra-sonication’, homogenisation’, ‘ultrafiltration’ and pasteurisation.

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

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

i. shelf-stable at ambient temperature or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance, so that any raw product is denatured;

ii. clearly identified as intended for human consumption;

iii. securely packaged or sealed in clean containers;

iv. accompanied by a commercial document and labelled in an official language of a Member State, so that document and labelling together give information on the nature, quantity and number of packages of the composite products, the country of origin, the manufacturer, and the ingredient;

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

The product must meet all the requirements of Article 6.1 and the requirement of Article 6.2 to be exempt from veterinary checks.

Although not a requirement of Article 6 of Commission Decision 2007/275/EC, the Product of Animal Origin (POAO) must also come from a country with an approved Residue Plan (see residue question).

8. What happens if random checks that are carried out at the BIP on products declared as meeting all the requirements of Article 6 reveal that they do not in fact comply with all the requirements of Article 6 of Commission Decision 2007/275/EC?

If random checks on those products declared as Article 6 composite products reveal that they do not comply with the requirements for exemption from standard veterinary checks, the OVS may then undertake full veterinary checks for which a charge will be levied in accordance with Article 28 of Regulation (EC) No 882/2004 on Official Food and Feed Controls.
9. Do composite products have to comply with the requirements in Commission Decision 2011/163/EC as amended on the approval of Residue Plans submitted by Third countries (make sure you look at the latest version)?

The composite product does not have to come from a country with an approved residue plan. However, the POAO ingredient(s), except wild caught fish, contained in the composite product must come from a country with an approved residue plan. The requirement for the plan applies to all POAO, regardless of the volume/percentage contained in the finished product.

It should be noted that gelatine and collagen can be imported from a country without such a plan. Residues of veterinary medicines are considered not to survive the production process of gelatine and collagen.

Food Business Operators should ensure that the processed product of animal origin ingredients in composite products come from a country with an approved residue plan and that they have appropriate documentary evidence to support this claim.

10. What conditions apply for a composite product containing meat products from two different countries with each country having different minimum heat treatment requirements in accordance with Commission Decision 2007/777/EC?

Products containing meat products from two different countries with different minimum heat treatment requirements will not be able to be imported unless the meat product is from an EU country. If a composite product contains meat products from two different countries, both countries, including the one from which the composite product is manufactured, must be listed in Commission Decision 2007/777/EC for treatment A for that type of meat product.

11. Do composite products have to be subjected to veterinary checks if they contain half or more processed products of animal origin?

Yes as per Article 3 of Decision 2007/275/EC as amended.

12. What rules apply to composite products that contain half or more processed POAO where there is more than one type of POAO?

This will depend on the circumstances. Please see the Annex below for more detailed information. In summary:

- If the composite product contains any processed meat product it will be subjected to vet checks even if the total amount of POAO is less than half;
- If the total POAO (e.g. dairy, egg, fishery products) when added up comprises more than half, it will be subjected to veterinary checks regardless of the type of processed POAO;

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• If the total POAO is less than half, contains no meat product and meets the requirements of Article 6 of Commission Decision 2007/275/EC it will not be subject to vet checks at the port.

13. **Does the composite product have to come from an EU approved establishment?**

• Where the processed POAO and the final composite product are produced in the same establishment, then that establishment would have to be EU approved.
• Where the processed POAO and the final product are manufactured in different establishments, the processed POAO must come from an approved establishment when required by EU legislation (see below). However, the final composite product does not necessarily have to be manufactured in an approved establishment;

The following POAO must come from an approved establishment:

• Any meat product;
• Processed dairy product if it comprises half or more of the composite product;
• Processed dairy product if it comprises less than half of the composite product and where the composite product does not meet the requirements of Article 6 of Commission Decision 2007/275/EC;
• Processed fishery products or processed egg products where that POAO comprises half or more of the composite product.
• Any other processed product of animal origin (other than those POAOs mentioned above) where the POAO makes up half or more of the substance of the composite product;
• The following diagram is an extract from Commission Regulation (EU) No 28/2012 as amended and indicates when the POAO has to come from an approved country and approved establishment:
14. Does the composite product have to come from an approved country?

Composite products containing meat products have to come from a country approved to export that type of meat product to the EU;

Composite products containing half or more of their substance of any one processed POAO other than meat products have to come from a country approved to export that type of POAO to the EU;

Composite products containing no meat products and less than half of their substance of processed milk where the composite products do not meet the requirements of Article 6 of Commission Decision 2007/275/EC must come from a country approved to export milk to the EU.

15. Does the processed product of animal origin have to come from the same country as the composite product?

- For composite products containing any processed meat product, the meat product must come from:
  - The same country in which the composite product is manufactured;
  - An EU country;
  - Another country with a similar high health status* (see below)

- For composite products containing processed dairy products where the dairy ingredients comprise half or more of their substance of dairy products or where the composite product is not shelf stable at ambient...
temperature and/or does not meet the requirements of Article 6 of Commission Decision 2007/275/EC the dairy products must come from:

- The same country in which the composite product is manufactured; or
- An EU country; or
- Another country with a similar high health status** (See below)

Please see Table 1 of the European Commission’s guidance for further information.

Where the composite product contains half or more egg products or fishery products, those processed POAO must come from an approved country.

For the fishery products, the country of origin must meet the requirements on illegal, unreported and unregulated (IUU) fishing requirements.

Where the composite products contain half or more of other processed POAO the same rules apply as if you were importing the pure product.

In all cases other than gelatine and collagen the processed POAO must also be from a country with an approved residue plan (Commission Decision 2011/163/EC).

16. What conditions apply for a composite product containing meat product from one country and dairy products from another country?

The composite product must come from:

- a country approved to export meat products to the EU (Commission Decision 2007/777/EC – Meat Products)*; and

- the dairy ingredients can only come from an EU country or a third country in Column A or B of Regulation (EU) No 605/2010 (Milk and Milk Products)**.

* meat products can only come from an ‘A treatment’ country (Decision 2007/777/EC) and go to another ‘A treatment’ country to be used in the manufacture of a composite product;

** dairy products can only come from one ‘column A’ or ‘column B’ country (Regulation (EU) No 605/2010) and go to another third country in which the composite product is produced and is also authorised under the same conditions i.e. ‘Column A’ to ‘Column A’ and ‘Column B’ to ‘Column B’.

Please note that if the composite product is a ‘Column C’ country, the dairy ingredients can only come from that country or the EU.

In all cases, the processed POAO must also be from a country with an approved residue plan.
17. If the composite product is not shelf stable at ambient temperature, is it subject to veterinary checks?

Composite products containing

- any amount of processed meat product must be veterinary checked.

- less than half of any other processed POAO and which meet all of the other requirements of Article 6 of Commission Decision 2007/275/EC, including the requirement that the product has undergone a complete cooking or heat treatment process throughout its substance so that any raw product is denatured (this means the whole composite product must have been cooked/heat treated), are not subject to veterinary checks.

Any dairy product must come from an approved country and be treated/processed in accordance with Article 3 or 4 of Regulation (EU) No 605/2010 as appropriate.

18. What products are listed in Annex II of Commission Decision 2007/275/EC?

<table>
<thead>
<tr>
<th>CN codes</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1704, 1806 20, 1806 31, 1806 32, 1806 90 11, 1806 90 19, 1806 90 31, 1806 90 39, 1806 90 50</td>
<td>Confectionery (including sweets) and chocolate, containing less than 50 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision.</td>
</tr>
<tr>
<td>1902 19, 1902 30, 1902 40</td>
<td>Pasta and noodles not mixed or filled with processed meat product; containing less than 50 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision.</td>
</tr>
<tr>
<td>1905 10, 1905 20, 1905 31, 1905 32, 1905 40, 1905 40 10, 1905 90 10, 1905 90 20, 1905 90 30, 1905 90 45, 1905 90 55, 1905 90 60, ex 1905 90 90</td>
<td>Bread, cakes, biscuits, waffles and wafers, rusk, toasted bread and similar toasted products; containing less than 20 % of processed dairy and egg products and treated as provided for in Article 6(1)(a) of this Decision. 1905 90 covers only dry and brittle products.</td>
</tr>
<tr>
<td>ex 2001 90 65, ex 2005 70 00 ex 1604</td>
<td>Olives stuffed with less than 20 % fish Olives stuffed with more than 20 % fish</td>
</tr>
<tr>
<td>ex 2104 10 and ex 2104 20</td>
<td>Soup stocks and flavourings packaged for the final consumer, containing less than 50 % of fish oils, fish powders or fish extracts and treated as provided for in Article 6(1)(a) of this Decision.</td>
</tr>
<tr>
<td>ex 2106 10, ex 2106 90</td>
<td>Food supplements packaged for the final consumer, containing small amounts (in total less than 20 %) of processed animal products (including glucosamine, chondroitin and/or chitosan) other than meat products.</td>
</tr>
</tbody>
</table>
The products listed in Annex II of Commission Decision 2007/275/EC as amended are exempt from veterinary checks

19. Are there any exceptions to the list of products in Annex II of Decision 2007/275/EC that need to be veterinary checked?

The list of products in Annex II includes biscuits, bread and cakes. To be exempted from veterinary checks, the products need to be in Annex II and meet the requirements of Article 6(2). These products should be of a basic nature and have been fully baked. Any toppings or fillings must not contain meat product and must meet the Article 6 stability criteria. Thus cakes with fresh cream or whole egg or speciality bread with meat product are not exempted.

Confectionery products include retail-packaged individually-portioned ambient-stable desserts and sweets containing processed dairy products, egg and gelatine. It may not include sweets that are made with high levels of processed or unprocessed dairy products and sugar which may be dairy products.

If cakes are decorated with a non-dairy type topping, ensure that the consignment is accompanied by appropriate documentation to confirm that the cake toppings do not contain dairy ingredients. These products do not need to be subjected to veterinary checks.

You should contact the Food Standards Agency for advice on countries of origin for products containing only fish.

It should be noted that Article 6.2 of Commission Decision 2007/275/EC applies to Annex II products and as such all dairy ingredients must be from a country listed in Annex I of Regulation (EU) No 605/2010 and must have been treated/processed as provided in that Regulation.

20. What are meat concentrate, powders and extracts?

They are meat products and must be imported in accordance with the requirements of Commission Decision 2007/777/EC as amended.

21. If a composite product contains processed meat and dairy ingredients and no other POAO should the references to fish and egg in the certificate be deleted?

Yes. Further, if the composite product contains less than half its substance of dairy ingredients and is shelf stable at ambient temperature, the dairy products part of the health certificate does not need to be completed.

22. Can I import a composite product containing dairy ingredients from a country that is not approved for imports of dairy products?
If the composite product complies with the requirements of Article 6 of Commission Decision 2007/275/EC the composite product can come from a country that is not approved for dairy products. But, in accordance with Article 6.2 of that Decision, the processed dairy ingredients must come from an approved country and has to have had the appropriate treatment as laid down in Regulation (EC) No 605/2010.

It is also acceptable for the dairy ingredients to come from an EU country.

In both cases appropriate documentation must accompany the consignment to satisfy the requirements of Article 6.1 and to confirm the origin and treatment of the dairy ingredients.

Where the product contains more than half dairy products or where it contains less than half its substance of dairy products and does not meet the requirements of Article 6 of Commission Decision 2007/275/EC, the dairy ingredients will have to come from an approved establishment.

The processed POAO must come from a country with an approved residue plan (Commission Decision 2011/163/EC).

23. If the product falls outside the requirements of Article 6, do the dairy ingredients have to come from a country that is approved for imports of dairy products?

Yes, the dairy ingredients do have to come from an approved country.

If a composite product contains dairy ingredients and does not meet the requirements of Article 6 of Decision 2007/275/EC (e.g. it contains half or more of dairy ingredients or it contains less than half its substance of dairy ingredients and it is not shelf stable at ambient temperature), it will need to be

- accompanied by the health certificate provided for in Regulation (EU) No 28/2012 as amended;
- enter through a BIP; and
- be subjected to veterinary checks

In accordance with the requirements of the certificate (last condition of part II.B.2(a)) the country of origin indicated in box I.7 must be listed in Annex I to Regulation (EU) No 605/2010 and the treatment applied must conform with the treatment provided for in that list for that relevant country.

24. Can I import a composite product containing dairy products from a country that is listed in Column C of Regulation (EU) No 605/2010 but does not have any approved establishments?

Yes, provided that either

- the dairy product is from an approved establishment in the EU; or
• if the dairy products is less than half of the composition of the composite product and it meets the requirements of Article 6 of Commission Decision 2007/275/EC.

25. Can POAO used in composite products come from an EU country?

Yes, POAO can come from an approved establishment in an EU country, be exported to a Third country and be imported into the EU in a composite product, provided all the other relevant requirements for composite products are met. The consignment must be accompanied by appropriate documentation confirming the origin of the POAO.

26. Is tinned tuna with oil a fishery product or a composite product?

It is a fishery product as the oil it there to add special characteristics.

27. Is tinned tuna with salad a composite product?

Yes if the tuna constitutes half or more of the product, as the processed product, i.e. tinned, is mixed with a product of plant origin. It will need to be veterinary checked and be accompanied by the certificate in Regulation (EU) No 28/2012 as amended with all relevant sections completed.

28. Is pizza a composite product? What conditions apply?

Yes, if it is made with processed POAO. If it is not shelf stable at ambient temperature, it will need to be veterinary checked and be accompanied by the certificate in Regulation (EU) No 28/2012 as amended with all relevant sections completed. This includes vegetarian pizzas (e.g. no meat or fish) which only contain cheese e.g. has cheese sprinkled on top.

29. Is a fruit trifle with pasteurised fresh cream subject to veterinary checks? What conditions apply?

Yes. It is not shelf stable at ambient temperature and would need to be accompanied by the certificate in Regulation (EU) No 28/2012 as amended with all relevant sections completed.

30. What about ice-cream made with powdered milk where the milk has already been processed/heat treated before being used to manufacture the ice-cream?

The ice-cream is not shelf stable at ambient temperature and as such does not meet the requirements of Article 6 of Decision 2007/275/EC. It will therefore have to be veterinary checked and accompanied by the certificate in Regulation (EU) No 28/2012 as amended. The dairy product will have to come from an approved establishment in an approved country under Regulation 605/2010.

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31. Is a meat and pasta bake containing raw/unprocessed meat a composite product?

No. Composite products are those containing *processed* products of animal origin. This is a meat preparation and needs to meet the relevant requirements laid down in Commission Decision 2000/572/EC.

If it contains cheese or other animal products, guarantees in the form of official health certification may be required about the country of origin, processing, establishment of origin etc.

32. What about dried rice pot with a sachet containing meat or dairy ingredients?

If the sachet contains meat powders, extracts or concentrates, it will have to be treated as a meat product.

If the sachet contains half or more of its substance of processed dairy product, the product would be subject to veterinary checks, and the dairy product would have come from either an EU country or an approved country and heat treated in accordance with the requirements of Regulation (EU) No 605/2010. The sachet is treated as a product in its own right regardless of the content of the rice pot.

33. What about products that contain rice or noodles with meat powders, extracts or concentrates mixed in with the rice/noodles?

These would be composite meat products and have to comply with the rules for such products.

34. What about gelatine capsules containing fish oil?

These should be regarded as a fishery product and are subject to veterinary checks. They need to be accompanied by a certificate laid down in Regulation (EC) No 2074/2005 as amended. If the gelatine is derived from bovine, ovine or caprine material, the consignment will need to be accompanied by a certificate confirming that it does not contain Specified Risk Material. General Authorisations IMP/GEN/2016/07 or IMP/GEN/2016/08 apply.

35. What about a sandwich containing processed POAO and uncooked vegetable e.g. tuna and onion sandwich spread which contains 60% tuna and uncooked onion?

This is a composite product containing cooked fish. It does not matter that the onion is not cooked because a composite product consists of processed POAO but the non-POAO material does not have to be processed. It will have to come in with the health certificate in Regulation (EU) No 28/2012 as amended.
36. **What about a product containing cooked meat and vegetable e.g. a meat and potato pie?**

This is a composite product and we would expect it to be accompanied by the health certificate in Regulation (EU) No 28/2012 as amended.

37. **Are chicken nuggets composite products**

This is a meat product and should be accompanied by a meat product certificate in accordance with the requirements of Commission Decision 2007/777/EC.

38. **What about products including supplements such as collagen drinks that contain only collagen and water?**

This is not a composite product (no plant material). It is a collagen product and would have to meet the relevant requirements of Regulation (EC) No 2074/2005 as amended.

Even if it contains sugar, the sugar would generally be there as a sweetener to give special characteristics, rather than plant material to make it a composite product.

39. **What about confectionery that contains high amounts of milk, sugar and other ingredients e.g. nuts and sweets?**

These would generally be regarded as dairy products. The sugar is there as a sweetener and nuts are for flavour. They would have to be imported with the health certificate in Regulation (EU) No 605/2010 (dairy products) and enter through a BIP where they will be subject to veterinary checks.

40. **What about food supplements containing high amounts of meat powders?**

Meat powders are meat products. Most of these products do not contain plant material. Where there is plant material it is usually there as a flavour or thickener.

They should usually be imported in accordance with the requirements of Commission Decision 2007/777/EC (Meat products) or if the competent authority is unable to issue the meat products certificate, the importer may need to apply to APHA for an import authorisation.

41. **What about novelty products such as ready to eat chocolate covered bacon?**

This would be a meat product. The chocolate or any other ingredients e.g. nuts are there for flavour.
### Annex

<table>
<thead>
<tr>
<th>Product</th>
<th>Requirements</th>
<th>Comments</th>
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</thead>
</table>
| Product contains any processed meat product                            | • Enter through a BIP and subject to veterinary checks;  
• will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed. | Note the questions on country of origin in relation to similar health status of meat and dairy products. |
| Product contains half or more processed dairy product                  | • Enter through a BIP and subject to veterinary checks;  
• will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed. |                                                                                               |
| Product contains less than half its substance of processed dairy product and does not meet the requirements of Article 6 of Commission Decision 2007/275/EC | • Enter through a BIP and subject to veterinary checks;  
• will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with all relevant sections completed. |                                                                                               |
| Product contains less than half of processed dairy product and meets the requirements of Article 6 of Decision 2007/275/EC | • Can be imported through any port or airport;  
• it does not need to be veterinary checked;  
• does not need to be accompanied by a health certificate.  
• the product must be shelf stable at ambient temperature or it must have undergone a complete cooking or heat treatment process throughout its substance so that any raw product is denatured (this means the whole product must have been cooked/heat treated) and must meet all of the other requirements of Article 6. | Comply with the other requirements of Article 6.                                               |
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<thead>
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| Product contains processed meat product and processed dairy products where the combined POAO is more than half of the product, but the dairy is less than half | • Enter through a BIP and subject to veterinary checks  
• will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended  
• if it is shelf stable at ambient temperature, only the meat part of the certificate needs to be completed;  
• if it is not shelf stable at ambient temperature both the meat and dairy parts of the certificate will need to be completed | But OK if the dairy part is completed                                                              |
| Product contains processed meat product and processed dairy products where the combined POAO is more than half of the product, but the dairy is half or more | • Enter through a BIP and subject to veterinary checks  
• will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended  
• both the meat and the dairy parts of the certificate need to be completed regardless of the storage requirements (ie even if it is shelf stable at ambient temperature) |                                                                                                                                                        |
| Product contains no meat product, but contains either processed dairy or processed egg or processed fishery products and the total processed POAO is half or more of the product | • Enter through a BIP and subject to veterinary checks  
• If the individual processed POAOs are less than half of the product, it will not need a health certificate but the consignment needs to be accompanied by appropriate documentation for traceability  
• If the product contains more than half of any one processed POAO it must be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended with the relevant parts of the certificate completed  
• If the product contains less than half processed dairy products and it not shelf stable at ambient temperature it will need to be accompanied by the health certificate laid down in Regulation (EU) No 28/2012 as amended |                                                                                                                                                        |
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<td>Any composite product</td>
<td>The processed POAO must come from a country with an approved residue plan as listed in Commission Decision 2011/163/EC as amended.</td>
<td></td>
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