

Q&A on SPS control requirements for imported feed from Third Countries (incl. GB)

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Questions	Answers from Irish Department of Agriculture DAFM / 14/01/2021	Answers from DG SANTE
Is a CHED-D required for animal feed products of non-animal origin?	Only high risk feed of non animal origin (1793/2019) and hay and straw are required to be notified through TRACES	Compound not containing products of animal origin are not required to be imported through BCPs. However, certain national authorities may require that compound feed are controlled at import points (ports) according to article 44). (oral communication 4/02/2021)
If an animal feed contains multiple POAO do you have to provide an EHC for each POAO?	Yes, as per EU142/2011 Annex XIV and XV, a health cert is required for each ABP type within the animal feed for import into the EU.	A consignment should be accompanied by a health certificate for imports of the concerned ABP included in the compound feed/premixtures(e.g.: processed animal protein, milk/milk products, rendered fats, etc.). (18/01/2021)
Does premix produced using a POA need to enter through a BCP and carry a health cert?	Yes	

Is a EHC required for compound feed / premixture for food producing animals containing vitamins coated with gelatine?		Gelatine intended for feeding of farmed animals in any form should be subject to BCP controls, including certification in Third Countries. Products imported as pharmaceutical products for the use in veterinary subject to Directive 2001/82/EC(repealed by Regulation (EU) 2019/6) are out of the OCR and animal health checks. (22/01/2021)
What do we do if we can't find an EHC for our product i.e. glucosamine and chondroitin in equine feed?	There are many different certs laid down in EU142/2011 Annex XV and specific requirements laid down in Annex XIV so all permitted animal feeds should be covered. In terms of glucosamine and chondroitin, we would require further detailed information in relation to that to see which cert if any would be applicable.	If no health certificate is foreseen under Annex XV of Regulation (EU) 142/2011, e.g. for glucosamine or chondroitin sulphate, then this is considered as a non-harmonised area and therefore it is up to BCP authorities to control the goods based on other available documents. An absence of certificate is not a case to prohibit imports. (Oral communication 4/02/2021)
REGULATION (EU) 2019/2007 requires SPS controls for compound feed containing products of animal origin but the concept of products of animal origin applies only to goods destined to human consumption. So which compound feed are concerned?		The wording of column 3 of CN 2309, instead of " <i>All, if containing products of animal origin</i> ", should read " <i>All, if containing animal products</i> ". This wording will be corrected. Pending this, the only possible interpretation is still " <i>All, if containing animal products</i> " and such imported consignments must be presented at BCPs for official controls, whatever the controls (13/01/2021)
Would it be possible to have a specific EHC for animal feed containing POAO, similar to the EHC that exists for processed petfood?	POAO is a term used for human consumption products but I presume that the question here relates to ABPs. The certs already laid down in 142/2011 are ingredient specific as ABPs can be imported solely or incorporated into other products such as animal feed or petfood.	For the time being there is no available animal health certificate for imports of compound feeds and premixtures (18/01/2021)

Will Phyto certificates and CHED PP's be required for herbal based equine feed.	No, phytocert required. Dependent on CN code, if falls under 12130000 or 121490 (Hay and Straw) then Veterinary checks at BCP required, Traces, and all that goes with that.	
Do you differentiate between 'animal feed' and 'pet food'? (i.e. petfood not entering the human food chain) or both classed the same?	Petfood packed for the final consumer has sperate certificates. Raw material (Animal by products) being imported for further processing into petfood will come in on animal by product certs. Both are subject to import controls and require Pre-notification to the BCP of entry by CHED generation and document submission to the Imports Portal.	
Does the rule for composite food apply to animal feed (e.g compound feed containing colostrum <50%). Will that require a health certificate?	Composite rules apply only to food for human consumption. There is no derogation on POAO for animal feed. Your product will require certification	
What is the process for composite products produced using processed poao where the site is registered but not approved?	You may be asked by the BCP staff on occasion as to why the premises doesn't have an approval number, it is not always immediately obvious to the staff that a plant uses already processed POAO in their productions and therefore will not have an approval number. As we get more used to the products and sites of establishment coming through the BCP and the Establishments lists on TRACES NT is updated, the process should become smoother	
Can a UK company complete TRACES-NT?	Only an EU Company /addressee can register as "responsible for the load" i.e to generate CHEDs on traes NT.	

Box 1.9 in Ched, which docs are mandatory?	Health certificate reference number is mandatory here, you can enter others, but please enter the Health cert first. It is not mandatory to upload a copy of the health cert or other documents to TRACES, but it can be helpful. These documents will all be uploaded to the Portal.	
If a product is imported into the UK from the EU, when it is re-exported to Ireland, is it regarded as being of UK or EU origin?	From the point of view of importing Product of animal origin and SPS checks, if this product has been unloaded in GB, it becomes GB, and needs re-certifying in GB for exporting to the EU/IE. If it is not unloaded, this is considered transit from EU to EU as such there are no veterinary/phytosanitary certification or pre-notification is required. In this case, the consignment should be in a sealed container and should also be accompanied by a signed declaration from the operator stating that this consignment is in veterinary / phytosanitary transit	
Should the EHC show an expected delivery time at the BCP?	The EHC does not have to but the CHED should, it can be filled in in the pre-notification box of the CHED.	
Ref Traces. Changes required after 'In Progress' can only be done by BCP. How can BCP be contacted? Up to what time before arrival can changes be made?	Correct, once in progress, only the BCP staff can edit the CHED. They are only put into Progress once the Documentary check has been signed off.	

