

# UK BCP Questions for clarification – version 8

## 1. Export of Composite Products

Your previous response confirmed that an establishment dispatching a composite product does not need to be approved and listed if it is simply assembling the composite product from pre-processed POAO. Can you please confirm whether in this situation it is acceptable to insert 'N/A' in the 'Approval Number' part of Box I.11 on the Composite Product EHC or if the 852/2004 Registration Number should be entered?

We note that the EHC indicates the '*approval or registration number if available*' but have seen different requirements applied by different BCPs.

DG SANTE answer:

According to the model certificate provided for in Regulation (EU) No 468/2012, the foot note of Box I.11 "*Place of origin*" reads "*Name, address and registration/approval number if available of the establishments of production of the composite products*".

It means that, in the case where the establishment of production of the composite product does not need to be approved/listed, the registration number is only optional and the corresponding area can be left empty in the certificate.

## 2. Movements from ambient stores

We understand that ambient storage facilities are exempt from requiring approval and therefore do not have to be listed in TRACES (as per Article 6 of Reg (EU) 2019/625).

What does this mean for exports of shelf-stable products (other than composites), which do not appear to have a route to export at present?

We are receiving numerous enquiries from exporters trying to move consignments from such ambient storage facilities into the EU. In some instances, the BCPs are requesting that Box I.11 needs to be fully completed with an 'Approval Number' of the establishment of dispatch, even when this is clearly not possible for an ambient store.

Is it acceptable to provide the local authority registration number in this box? (noting that this does not appear anywhere in TRACES or the online list of UK (GB) approved establishments).

DG SANTE answer:

According to the model certificate provided for in Regulation (EU) 2019/628, the foot note of Box I.11 "*Place of dispatch*" reads "*the name, address and approval number, if required by the European Union legislation, of the holdings or establishments from which the animals or the products come from*".

It means that, in the case where EU legislation does not require this type of establishment to be approved/listed (e.g. ambient store), the registration number is not required and the corresponding area can be left empty in the certificate.

## 3. Qualification and title of certifying officers for fishery products EHC

We are aware of certain BCPs rejecting consignments of fishery products because of the "Qualification and title" of the certifying officer on the EHC. As we use non-veterinary Certifying Officers to certify exports of fishery products, their qualifications may not be exactly the same in all cases. We would welcome confirmation if there is a specific requirement for information entered under this heading.

DG SANTE answer:

According to Art. 88 OCR, competent authorities shall designate the certifying officers who are authorised to sign official certificates. According to the model certificate for fishery products laid down in Regulation (EU) 2019/628, the document must be signed by an official inspector (including official veterinarians). There is no specific requirement about the "qualification and title" of certifying officers, provided they are designated and authorised by the competent authorities.