



**11th July 2024 meeting of the
PAFF COMMITTEE
SECTIONS ANIMAL HEALTH AND WELFARE/CONTROLS AND IMPORT CONDITIONS**

a prolongation of the deadline for submission of the evidence

**Information on collection, transport
and
use of wool**

Agenda point AHW.A.06



Purpose of the presentation

- A thematic compilation of the most relevant ABP rules for wool
- Technical assistance from Commission to Member States
- On a material (wool) where:
 - Baseline rules are relatively simple
 - But national considerations, alternatives and derogations are possible
 - Considerations, alternatives, derogations mainly affect domestic markets, also the EU one
 - Past outbreaks of sheep pox and goat pox also complicated the baseline in certain regions
 - Wool industry representatives indicated burden and possibly diverging views

Categorisation of wool

- **Definition of animal by-products laid down in Article 3(1) of Regulation (EC) No 1069/2009:**

‘1. ‘animal by-products’ means entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen;’

- **Wool is category 3 material referred to in Article 10(h):**

*‘blood, placenta, **wool**, feathers, hair, horns, hoof cuts and raw milk originating from live animals that did not show any signs of disease communicable through that product to humans or animals;’*

Possible disposal and use of wool

Article 14 of Regulation (EC) No 1069/2009:

- The most common is use of wool for the production textile; or
- Used in the manufacturing of feed (lanolin=>Vitamin D3)
- Used in the manufacturing of organic fertilisers or soil improvers;
- Composting/transformation into biogas;
- Used in the manufacturing of pharmaceutical products or cosmetics;
- Used in production of certain technical products (e.g., insulation)
- Disposed as waste by incineration; co-incineration; buried in an authorised landfill

Registration of establishments where wool is generated

- Wool is always generated at an establishment keeping live sheep subject to Regulation (EU) 2016/426 (Animal Health Law).
- Some ABP establishments or plants are exempted from registration in accordance with Article 23(4) of Regulation (EC) No 1069/2009, for the purpose of that Regulation:

‘4. By way of derogation from paragraph 1, no notification with a view to registration shall be required for activities with respect to which establishments generating animal by-products have already been approved or registered in accordance with Regulation (EC) No 852/2004 or Regulation (EC) No 853/2004; and for activities with respect to which establishments or plants have already been approved in accordance with Article 24 of this Regulation.

The same derogation shall apply for the activities involving the generation of animal by-products on site only, which are carried out on farms or other premises where animals are kept, bred or taken care of.’

Transport of wool and possible national alternative system

Commercial documents referred to in Article 21(3) of Regulation (EC) No 1069/2009 exempted for registration for the purpose of that Regulation:

‘3. Commercial documents and health certificates accompanying animal by-products or derived products during transport shall at least include information on the origin, the destination and the quantity of such products, and a description of the animal by-products or derived products and their marking, when such marking is required by this Regulation.

*However, for animal by-products and derived products transported within the territory of a Member State, the competent authority of the Member State concerned may authorize transmission of the information referred to in the first subparagraph **by way of an alternative system.**’*

Baseline treatments of wool and possible alternatives

Definition of ‘untreated wool’ set out in Annex I, point 31 to Regulation (EU) No 142/2011:

‘31. ‘untreated wool’ means wool, other than wool which has:

(a) undergone factory washing;

(b) been obtained from tanning;

*(c) been treated by **another method** that ensures that no unacceptable risks remain;*

(d) been produced from animals other than those of the porcine species, and has undergone factory-washing which consisting of the immersion of the wool in series of baths of water, soap and sodium hydroxide or potassium hydroxide;

...’

Treatments of wool continued: another specific alternative

Definition of ‘untreated wool’ set out in Annex I, point 31 to Regulation (EU) No 142/2011:

‘31. ‘untreated wool’ means wool, other than wool which has:

...

*(e) been produced from animals other than those of the porcine species, is intended for being **dispatched directly to a plant producing derived products from wool for the textile industry and has undergone at least one of the following treatments:***

(i) chemical depilation by means of slaked lime or sodium sulphide;

(ii) fumigation in formaldehyde in a hermetically sealed chamber for at least 24 hours;

(iii) industrial scouring which consists of the immersion of wool in a water-soluble detergent held at 60–70 °C;

(iv) storage, which may include the journey time, at 37 °C for eight days, 18 °C for 28 days or 4 °C for 120 days’

Processing of wool - End point in the manufacturing chain 1.

Annex XIII, Chapter VII, point B to Regulation (EU) No 142/2011:

B. End point for wool and hair as relevant for the whole EU market

‘Factory-washed wool and hair, and wool and hair which has been treated by another method which ensures that no unacceptable risks remain, may be placed on the market without restrictions in accordance with this Regulation.

...’

Processing of wool - End point in the manufacturing chain 2.

Annex XIII, Chapter VII, point B to Regulation (EU) No 142/2011:

B. End point for wool and hair as may be relevant only for domestic markets

...

*,Member States may authorize the placing on the market of untreated wool and hair from farms or from establishments or plants which have been registered in accordance with Article 23 of Regulation (EC) No 1069/2009 or approved in accordance with Article 24(1)(i) of the same Regulation **on their territory without restrictions in accordance with this Regulation**, if they are satisfied that no unacceptable risks to public and animal health arise from the wool and from the hair.'*



Possible restrictions for the prevention and control of certain animal diseases

In addition to the baseline, in case of an outbreak of certain listed diseases transmissible to sheep Commission Delegated Regulation (EU) 2020/687 and other specific rules apply.

Manufacturing of organic fertilisers and soil improvers (OF/SI) and possible national derogation

1. General requirements Article 14(d)(iv) and Article 32(1)(a) of Regulation (EC) No 1069/2009: wool may be used in, or as OF/SI.

2. Requirements for certain OF/SI set out in Annex XI, Section 1 point 1(b) to Regulation (EU) No 142/2011:

*‘(b) using processed animal protein, including processed animal protein produced in accordance with point B.1(b)(ii) of Section 1 of Chapter II of Annex X, which has been produced from Category 3 material in accordance with Section 1 of Chapter II of Annex X, or materials which have been subject to **another treatment**, where such materials may be used for organic fertilizers and soil improvers in accordance with this Regulation;’*

Imports of wool from third countries:

1. **Article 25(2) of Regulation (EU) No 142/2011...** *'the importation into and the transit through the Union of the follow shall not be subject to any animal health conditions'*:
 - i. **Treated wool referred to Article 25(2) points (a)** [factory washing], **(c)** [factory washing followed by chemical treatment] and **(d)** [chemical treatment, or fumigation in formaldehyde, or industrial scouring or storage for certain combinations of time and temperature].
 - ii. **Untreated wool** intended for the **textile industry** referred to in **Article 25(2)(e)**, provided wool come from certain third countries from where fresh meat of ruminants may be imported. A consignment must be accompanied by a declaration of importer set out in Annex XV, Chapter 21 to Regulation (EU) No 142/2011.
2. **Untreated wool may be imported from any third country without a certificate, provided that wool is securely enclosed in packaging and sent directly to a plant for processing wool.**

Imports of untreated wool from third countries:

Detailed information for imports of **untreated wool** is set out in Table 2, row 8 of Annex XIV, Chapter II to Regulation (EU) No 124/2001

No	Product	Raw materials (reference to provisions of Regulation (EC) No 1069/2009)	Import and transit conditions	Third countries' lists	Certificates/model documents
8	Untreated wool and hair produced from animals other than those of the porcine species	Category 3 materials referred to in Article 10, points (h) and (n).	<p>(1) The dry untreated wool and hair must be:</p> <ul style="list-style-type: none"> (a) securely enclosed in packaging; and (b) sent directly to a plant producing derived products for uses outside the feed chain or a plant carrying out intermediate operations, under conditions which prevent the spreading of pathogenic agents. <p>(2) The wool and hair are wool and hair as referred to in Article 25(2), point (e).</p>	<p>(1) Any third country.</p> <p>(2) Third country or region thereof</p> <ul style="list-style-type: none"> (a) listed in Part 1 of Annex XIII to Implementing Regulation (EU) 2021/404 and authorised for imports into the Union of fresh meat of ruminants not subject to additional specific conditions; and (b) free of foot and mouth disease and, in the case of wool and hair of sheep and goats, of sheep pox and goat pox in accordance with Part A of Annex IV to Commission Delegated Regulation (EU) 2020/692 (*). 	<p>(1) For imports of untreated wool and hair, no certificate is required.</p> <p>(2) A declaration of the importer in accordance with Chapter 21 of Annex XV is required.</p>



Conclusion and discussion

- Wool is a Category 3 material presenting a low animal and public health risk if obtained from healthy animals.
- The ABP legislation is fit for use and provides for several possibilities to consider, for alternatives and for derogations that may be applied by Member States.
- Factory washing provides a definite EU end point for wool intended for technical uses.