

PART I: CLARIFICATIONS FROM NOTE NO.2

(1) Sequential sealing

Thank you for confirming that an official certificate can be corrected, even by hand, provided that the modification is accompanied with the signature (or initials) and the stamp of the correcting officer. Where this results in the certificate bearing a series of successive corrections, we agree that there is a risk details on the certificate will become obliterated/unreadable.

To avoid such a risk, we have drafted a 'Non-Manipulation Certificate' which would be completed as more consignments are added to the means of transport (see Appendix). This will obviate the need for successive corrections on the certificate. If you would rather the actual seal number as applied to the means of transport when it arrives at the BCP is on each of these certificates, we could instruct an Official Veterinarian at the final pick-up point to amend the seal number on all the certificates based on the non-manipulation certificate, so there is just one correction pertaining to the seal number on the certificates.

DG SANTE answer:

This solution is welcome. We agree on the following procedure:

- Using this "non-manipulation certificate", in order to provide a precise traceability on the successive replacement of the seals put on the truck doors, and
- On the final pick-up and after putting the final seal on the truck doors, to amend this seal number on the previous certificates once and for all.

(3) Consignor versus point of dispatch

In your previous response you confirmed that the "consignor" entered in box I.1 and "place of dispatch" in box I.1.1 can be different. Is it a requirement that the details of the "consignor" must be from a non-EU country? We have example of an EU based company exporting from a subsidiary in GB and using their EU address in box I.1 and their GB subsidiary address as place of despatch.

DG SANTE answer:

According to the "notes for completion" in Annex II of Regulation (EU) 2019/628, the consignor must be located in the exporting third country.

"Box I.1. Consignor/Exporter: the name and address (street, city and region, province or state, as appropriate) of the natural or legal person dispatching the consignment that must be located in the third country, except for the re-entry of consignments originating from the European Union."

(4) Scope for multiple products with different commodity codes to be included in the same EHC

Further to the principle that various goods can be certified via the same certificate, is it permissible to have two batches of product with the same commodity code, one of which is frozen and the other is chilled, and which are both listed on the same EHC?

DG SANTE answer:

This is not possible as only one transport condition can be ticked in box I.18.

In addition, we remind you that a chilled product cannot be transported at a negative temperature and that a frozen product cannot be transported at a positive temperature.

(10) Hides on Ice

Thank you for your clarification previously on unprocessed animal by-products despatched from a food approved premises. However, as the products are being exported/imported as an animal by-product (ABP), does the food approved premises' name and address have to be listed separately in TRACES NT for food approved establishments and also under animal by-products establishments? Some BCPs seem to think so.

Our interpretation is that a single entry on TRACES NT can be used, with separate activities added to the approved establishment; i.e. if the ABP is handled and dispatched directly from a slaughterhouse.

DG SANTE answer:

When fresh hides and skins come directly from a slaughterhouse, the listing of this establishment as a slaughterhouse approved for HC is sufficient. There is no need for listing in addition this establishment in the lists for ABP.

PART II: FURTHER ISSUES

1. Language used in EHCs

Our understanding is that, in addition to English, EHCs published under Reg 2019/628 must be provided in the language of the point of entry into the European Union only. There is no requirement to provide the EHC in the language of the onward destination. Is this correct? Or does the EHC also need to match the language of the destination country?

DG SANTE answer:

We agree that official certificates must be drawn up in one or more of the official languages of the EU understood by the certifying officer and by the border control post.

2. Transit of mechanically separated meat of poultry

Please can you confirm if the transit of mechanically separated meat of poultry through the European Union is permitted? We understand that Commission Regulation (EC) No 798/2008 includes a model veterinary certificate for transit of this commodity. Regarding II.1.2 of this model certificate, can you confirm which relevant animal health conditions should be certified, considering that a model certificate for direct import of mechanically separated meat of poultry into the European Union is not currently available?

DG SANTE answer:

As the model certificate for import of mechanically separated meat of poultry is currently not available in Regulation (EC) No 798/2008, the model certificate for transit of mechanically separated meat of poultry cannot be used. Therefore we consider that the transit of mechanically separated meat of poultry is not permitted through the EU.

In addition, with the implementation of the AHL and of the new model certificates as from 21.04.2021, it will be even clearer that the transit of mechanically separated meat of poultry through the EU is not allowed.

3. Aquaculture products

The POAO Fishery Products certificate requires the type of origin of the products to be declared in box I.25, i.e. whether the fish are of 'wild' or aquaculture' origin. There is a consignment stuck in Rotterdam - reported to us with the reason that the officials expect the premises of production listed in I.25 to be a recognised aquaculture premises on TRACES NT because this box was annotated as 'aquaculture'. The premises listed in I.25 is in fact approved as a food establishment and we understand that no additional approval or TRACES listing is necessary. Dutch officials appear to say that this premises needs specific TRACES recognition as an 'aquaculture' products establishment.

GB premises that are approved under Reg 853/2004, and which also happen to be aquaculture registered premises, are listed in TRACES as food approved establishments with an approval number but not as aquaculture registered.

DG SANTE answer:

We confirm that the establishments which produce aquaculture products (i.e. fishery products of farmed origin) must be identified in TRACES with the additional remark 'Aq'. Therefore export of aquaculture products into the Union can only be allowed if they come from establishments listed for fishery products with the "Aq" remark.

Appendix 1: DRAFT certificate of non-manipulation of consignments

DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS
SCOTTISH GOVERNMENT



Manipulation certificate no: _____

CERTIFICATE OF NON-MANIPULATION OF CONSIGNMENTS ALREADY ON A MEANS OF TRANSPORT AS NEW CONSIGNMENTS ARE ADDED AS PART OF A MULTIPLE PICK-UP

MEANS OF TRANSPORT (vehicle registration/trailer/container number): _____

I, the undersigned Certifying Officer/s, hereby certify that:

- a) the above means of transport was sealed with the seal numbers specified in column 1 of the table below and it/they matched those mentioned on health certificate/s referenced in column 2;
- b) the seal/s was/were intact when it/they was/were removed under official supervision to load the consignment described in health certificate/s referenced in column 3;
- c) the means of transport was then sealed under official supervision with the seal number/s mentioned on the health certificate/s referenced in column 3 and specified in column 4;
- d) the contents already on the means of transport has not been tampered with during this process.

Column 1	Column 2	Column 3	Column 4	Certifying Officer's Stamp, Signature and Date
Seal number/s that were removed	Certificate number/s with seal number/s in column 1	Seal number/s which replaced those in column 1	Certificate number/s with seal numbers in column 3	