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**COMMISSION STAFF WORKING DOCUMENT**

**ILLUSTRATIVE GUIDANCE ON IMPORT/TRANSIT CONDITIONS AND  
CONTROLS OF CERTAIN COMPOSITE PRODUCTS, AND PRODUCTS WHICH  
COULD ERRONEOUSLY BE CONSIDERED AS COMPOSITE PRODUCTS,  
ORIGINATING FROM THIRD COUNTRIES**

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## **PURPOSE OF THIS DOCUMENT**

This document is mainly directed at Member States competent authorities, in particular at border inspection posts, and for information of Third Country competent authorities. It aims to give guidance on import and transit conditions and controls of certain composite products containing processed products of animal origin and plant products as well as for products containing different products of animal origin and for products containing unprocessed products of animal origin and plant products.

## **NOTE**

This document is an evolving document and may be updated as necessary to take account of experiences and information from competent authorities, in particular from border inspection posts and from the Food and Veterinary Office (FVO) of the Commission's Directorate General for Health and Food Safety.

*The Court of Justice of the European Union constitutes the judicial authority of the EU and is the institution which interprets European Union law as last resort.*

## ABBREVIATIONS AND DEFINITIONS USED IN THE GUIDANCE DOCUMENT

AH	Animal health
BIP	Border Inspection Post as defined in Council Directive 97/78/EC
CP	Composite product
CVED	Common veterinary entry document for products of animal origin as laid down in Annex III to Commission Regulation (EC) No 136/2004
DG SANTE	Directorate General for Health and Food Safety
EFSA	European Food Safety Authority
EU	European Union
HACCP	Hazard analysis and critical control points
HC	All products for human consumption
MS	Member State
OJ	Official Journal of the European Union
PH	Public health
PPOAO	Processed product of animal origin
RASFF message	Messages used in the Rapid Alert System for Food and Feed of the European Commission
TC	Third Country
TRACES	TRAdE Control and Expert System introduced by Commission Decision 2004/292/EC

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## 1. PURPOSE

The purpose of this guidance document is to achieve a common understanding in the Member States (MS) on the implementation of the import and transit control procedures for consignments of composite products from third countries. The guidance should clarify the import and transit conditions applicable for certain composite products containing processed products of animal origin and plant products as well as for products containing different products of animal origin and for products containing unprocessed products of animal origin and plant products.

This guidance document supplements the information in the following guidance documents:

"Key questions related to import requirements and the EU rules on food hygiene and official food controls<sup>1</sup>" published on:

[http://ec.europa.eu/food/international/trade/interpretation\\_imports.pdf](http://ec.europa.eu/food/international/trade/interpretation_imports.pdf)

"Guidance document on the implementation of certain provisions of Regulation (EC) No 853/2004 on the hygiene of food of animal origin<sup>2</sup>" published on:

[http://ec.europa.eu/food/food/biosafety/hygienelegislation/guide\\_en.htm](http://ec.europa.eu/food/food/biosafety/hygienelegislation/guide_en.htm)

## 2. INTRODUCTION

For food hygiene purposes, food containing both products of plant origin and processed products of animal origin are called “**composite products**”, which are covered in Article 1(2) and 6(4) of Regulation (EC) No 853/2004<sup>3</sup>. They are defined in Article 2(a) of Commission Decision 2007/275/EC<sup>4</sup> 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".

This definition is quite wide and therefore it is necessary to distinguish between composite products, processed products of animal origin (PPAO) and products, which could erroneously be considered as composite products.

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<sup>1</sup> SANCO/1446/2005 Rev. 2015

<sup>2</sup> SANCO/10098/2009 Rev. 2015

<sup>3</sup> Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin, OJ L 139, 30.04.2004, p. 55 and re-published in OJ L 226, 25.6.2004, p. 22.

<sup>4</sup> Commission Decision 2007/275/EC of 17 April 2007 concerning lists of animals and products to be subject to controls at border inspection posts under Council Directives 91/496/EEC and 97/78/EC, OJ L 116, 4.5.2007, p. 9.

## 2.1. Processed products of animal origin versus composite products

Annex I to this guidance document gives an overview of the scope of Regulations (EC) No 852/2004<sup>5</sup> and 853/2004. This overview is not exhaustive and therefore purely indicative and it might be subject to review in function of experience gained with the rules.

Regulation (EC) No 853/2004 does not apply to the production of food containing both products of plant origin and **processed** products of animal origin, unless expressly indicated to the contrary. Such exclusion from the scope is based upon the reason that the risk posed by the ingredient of animal origin can be controlled by implementing the rules of Regulation (EC) No 852/2004 without there being a need to apply more detailed specific requirements. However, Article 1(2) of Regulation (EC) No 853/2004 clearly spells out that the **processed products of animal origin** used to prepare **composite products** shall be obtained and handled in accordance with the requirements of Regulation (EC) No 853/2004 e.g.

- Milk powder used to prepare ice cream must have been obtained in accordance with Regulation (EC) No 853/2004; however, the manufacture of ice creams falls under Regulation (EC) No 852/2004
- Processed products of animal origin, such as meat, dairy and/or fishery products, used to prepare a pizza must have been obtained in accordance with Regulation (EC) No 853/2004, but the manufacture of the pizza falls under Regulation (EC) No 852/2004
- Meat and/or dairy products used to prepare ready-to-eat meals composed of such processed products and vegetables must have been obtained in accordance with Regulation (EC) No 853/2004, but the manufacture of these ready-to-eat meals falls under Regulation (EC) No 852/2004
- Egg products used to prepare mayonnaise must have been obtained in accordance with Regulation (EC) No 853/2004; however, the manufacture of mayonnaise falls under Regulation (EC) No 852/2004.

Such composite products are prepared in a registered establishment, but the products of animal origin used for the production of the composite product must originate from an approved establishment.

However, the addition of a product of plant origin during the processing according to Article 2(1)(m) of Regulation (EC) No 852/2004 to a processed animal product, e.g. to add special characteristics or when a product of plant origin is necessary for the manufacture of the product of animal origin (Article 2(1)(o) of Regulation (EC) No 852/2004) does not automatically mean that the resulting food falls within the meaning of Article 1(2) of Regulation (EC) No 853/2004 or within the definition of composite products, e.g.:

- Cheeses to which herbs are added or yogurts to which fruit is added remain dairy products, and their manufacture must be performed under Regulation (EC) No 853/2004;
- Sausages to which garlic or soya is added remain meat products, and their manufacture must be performed under Regulation (EC) No 853/2004;

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<sup>5</sup> Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, OJ L 139, 30.4.2004, p. 1 and re-published in OJ L 226, 25.6.2004, p. 3.



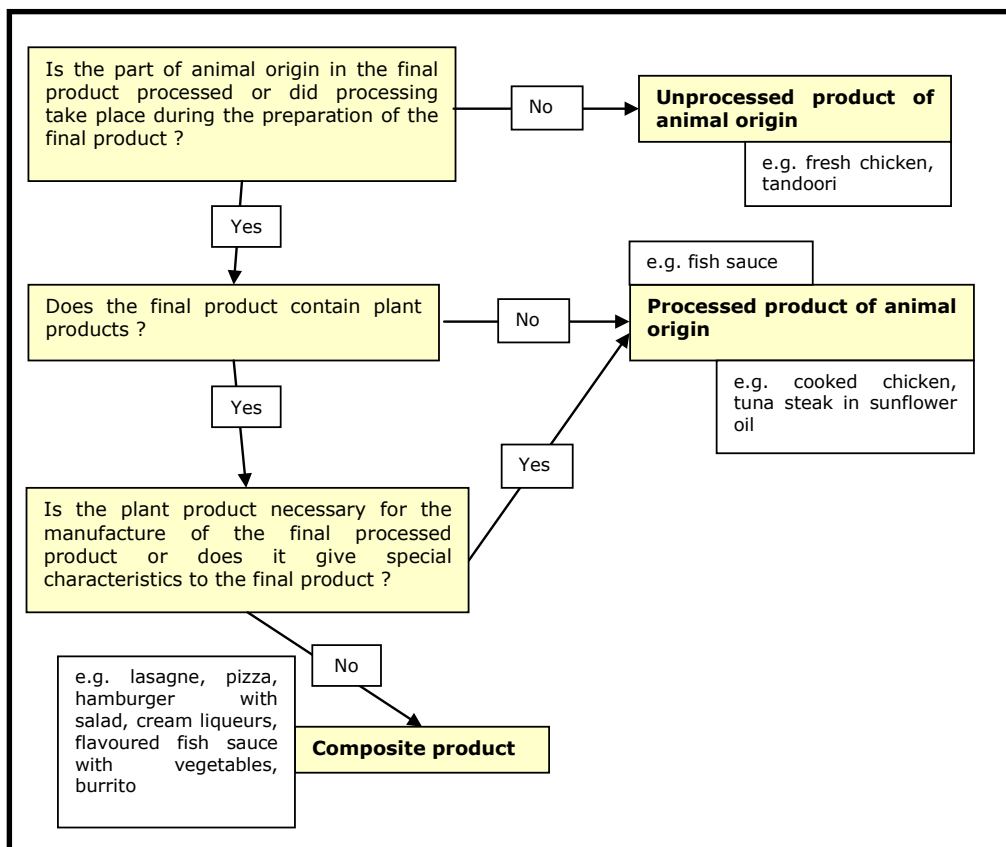
- Dairy ice cream, which is processed involving a heat treatment and to which fruits or other plant ingredients are added, remains a dairy product and must be processed under Regulation (EC) No 853/2004.

In general, a composite product can originate from an establishment registered by the competent authority and the label does not need to bear the identification mark of the establishment. However,

- an approved establishment manufacturing both products of animal origin and other products, e.g. composite products, may apply the identification mark required for products of animal origin also on the other products (composite products) (point B.7 of Section I of Annex II to Regulation (EC) No 853/2004).
- **in case where production of the final composite products includes processing of the primary animal product as defined in Article 2(1)(m) of Regulation (EC) No 852/2004, the identification mark must be applied, as in this case the composite product must originate from an approved establishment.**

The following decision tree should help to differentiate composite products from products of animal origin:

**Picture 1: Decision tree to define if a product containing ingredients of animal origin must be considered as a composite product**



A non-exhaustive list with examples of PPOAO is detailed in Annex II to this guidance document.

## 2.2. Products which could erroneously be considered as composite products

### 2.2.1. *Products of unprocessed animal products and plant products*

A non-processed product of animal origin associated with a product of plant origin remains a non-processed product of animal origin, for example:

- Skewer containing fresh meat and vegetables
- Preparations of fresh fishery products (e.g. fish fillets) with food of plant origin
- Glass of honey with nuts.

Such products need to originate from the approved third country or part thereof authorised for the introduction into the EU of the relevant animal product. They need to originate from an approved establishment and a third country with an approved residue control plan for both product types. They need to be accompanied by the model health certificate for the animal product used.

### 2.2.2. *Combinations of products of animal origin*

Food products which contain different products of animal origin, independently on whether they are unprocessed or processed, **are not considered to be composite products** if no products of plant origin are included.

If a major part of a product of animal origin is processed with small quantities of other products of animal origin, which are necessary for technological reasons, the final product shall originate from an approved establishment and a third country authorised for the introduction into the EU of that major part of product of animal origin, for example:

- Fish ball with very small amount of egg white used as thickener
- Skewers with meat marinated in yoghurt, milk, oil and spices
- Surimi to which very small amount of egg white is added for technological reasons.

If several products of animal origin are mixed or assembled without technological reasons of processing, the final product needs to originate from a third country authorised for the introduction into the EU of each animal product used in the mixed/assembled product. The final product needs to originate from an approved establishment for each product type and shall be accompanied by the relevant model health certificates applicable for each product of animal origin used in the mixed/assembled product, for example:

- Steak presented in a package with a piece of butter
- Whole fish, ready to cook, presented with a meat stuffing
- Sushi decorated with egg products.

### **3. IMPORT CONDITIONS OF COMPOSITE PRODUCTS**

#### **3.1. Animal health conditions for import of composite products**

Products of animal origin from third countries must comply with requirements that prevent the introduction of animal diseases into the EU. These requirements are listed in Council Directive 2002/99/EC<sup>6</sup> and one of them is that products of animal origin have to originate from listed third countries. In addition, for meat and dairy products, certain treatments have been established, which are proportionate to the animal health risk of the third country concerned and which are laid down in the two third country lists (Decision 2007/777/EC<sup>7</sup> for meat products and Regulation (EU) No 605/2010<sup>8</sup> for dairy products). For more information, see:

[http://ec.europa.eu/food/animal/animalproducts/index\\_en.htm](http://ec.europa.eu/food/animal/animalproducts/index_en.htm)

There are specific derogations in relation to the fulfilment of the animal health requirements for consignments of animal products moved in transit through the EU territory between Russia and Russia (Kaliningrad) and from Bosnia and Herzegovina to the Croatian port of Ploče.

For certain products of animal origin there are no animal health requirements laid down, as they are not considered to present a risk to animal health (please see details in Chapter 4 of this guidance document).

#### **3.2. Public health conditions for import of composite products**

All products of animal origin from third countries intended to be imported into the EU must comply with the EU food hygiene requirements. This principle is also applicable for composite products, including those addressed in Articles 4 to 6 of and Annex II to Decision 2007/275/EC.

##### *3.2.1. Basic food hygiene requirements*

The requirements with regard to the hygiene for composite products are contained in Articles 3 to 6 of Regulation (EC) No 852/2004, which means that the following rules need to be respected by food business operators in third countries:

- A general obligation on the operator to monitor the food safety of products and processes under his responsibility (Article 3 of Regulation (EC) No 852/2004),
- General hygiene provisions for primary production (Article 4(1) of, and Part A of Annex I to, Regulation (EC) No 852/2004),

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<sup>6</sup> Council Directive 2002/99/EC of 16 December 2002 laying down the animal health rules governing the production, processing, distribution and introduction of products of animal origin for human consumption, OJ L 18, 23.1.2003, p. 11.

<sup>7</sup> Commission Decision 2007/777/EC of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC, OJ L 312, 30.11.2007, p. 49.

<sup>8</sup> Commission Regulation (EU) No 605/2010 of 2 July 2010 laying down animal and public health and veterinary certification conditions for the introduction into the European Union of raw milk and dairy products intended for human consumption, OJ L 175, 10.7.2010, p. 1.

- Detailed requirements after primary production (Article 4(2) of and Annex II to Regulation (EC) No 852/2004),
- Microbiological requirements as laid down in Article 4(3) of Regulation (EC) No 852/2004 and Commission Regulation (EC) No 2073/2005<sup>9</sup>,
- Procedures based on the Hazard analysis and critical control point (HACCP) principles (Article 5 of Regulation (EC) No 852/2004) ,
- Registration or approval of establishments (Article 6 of Regulation (EC) No 852/2004). The approval of establishments is necessary if products of animal origin are processed in the same establishment producing the composite products, please see details in Chapter 2.1 of this guidance document.

### 3.2.2. *Other food hygiene requirements*

In accordance with Article 6(4) of Regulation (EC) No 853/2004, food business operators established in the EU and importing composite products (food containing both products of plant origin and processed products of animal origin) must ensure that the processed components of animal origin contained in such food **satisfy the requirements for products of animal origin included in Article 6(1) to (3)**, i.e.

- The components come from a third country that appears on an EU list, and satisfy the product specific requirements applicable upon import in the EU,
- The establishment<sup>10</sup> (or the production area for molluscs) from which the components of animal origin used for producing the composite product have been dispatched, obtained or prepared, appears on an EU list of establishments from which imports are permitted,
- According to Council Directive 96/23/EC<sup>11</sup>, animal products, also when used as components of animal origin for the production of composite products, have to originate from a third country with an approved residue control plan for the specific component as laid down in Annex I to Commission Decision 2011/163/EU<sup>12</sup>,
- The importing food business operator must be able to demonstrate that the above is respected (e.g. appropriate documentation or certification, which

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<sup>9</sup> Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs, OJ L 338, 22.12.2005, p. 1.

<sup>10</sup> For more information, see:

[http://ec.europa.eu/food/food/biosafety/establishments/third\\_country/index\\_en.htm](http://ec.europa.eu/food/food/biosafety/establishments/third_country/index_en.htm)

<sup>11</sup> Council Directive 96/23/EC of 29 April 1996 on measures to monitor certain substances and residues thereof in live animals and animal products and repealing Directives 85/358/EEC and 86/469/EEC and Decisions 89/187/EEC and 91/664/EEC, OJ L 125, 23.5.1996, p. 10.

<sup>12</sup> Commission Decision 2011/163/EU of 16 March 2011 on the approval of plans submitted by third countries in accordance with Article 29 of Council Directive 96/23/EC, OJ L 70, 17.3.2011, p. 40.

does not need to be in line with the formal requirements of Article 14 of Regulation (EC) No 854/2004<sup>13</sup>, or otherwise).

However, these requirements do currently not apply to all composite products since a transitional measure allows current practices regarding the import requirements of composite products containing non-harmonised processed products of animal origin to continue (see below, section 4).

### **3.3. Plant health requirements**

Before they can be introduced into the EU, certain plants, plant products or other objects must comply with phytosanitary requirements.

For more information, see: [http://ec.europa.eu/food/plant/index\\_en.htm](http://ec.europa.eu/food/plant/index_en.htm)

### **3.4. Other health requirements**

Independently from the application of Directives 96/23/EC and 2002/99/EC and Article 6(4) of Regulation (EC) No 853/2004, importers of food containing products of animal origin need to consider also other requirements that need to be complied with:

- Under relevant requirements of EU food law, a number of rules apply that complement or are in addition to food hygiene. These include, in particular, and, where appropriate, requirements concerning:
  - Contaminants
  - Maximum residue levels for pesticides
  - The use of food additives
  - Materials and articles in contact with foodstuffs
  - Food irradiation
  - Novel foods (Regulation (EC) No 258/97<sup>14</sup>)
  - Radioactivity.
- Product specific requirements also exist concerning:
  - Quick frozen foodstuffs
  - Foodstuffs for particular nutritional purposes – this concept will be replaced as of 20 July 2016 with "food for specific groups"<sup>15</sup>
  - Genetically modified organisms (GMOs).

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<sup>13</sup> Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, OJ L 139, 30.04.2004, p. 206 and re-published in OJ L 226, 25.6.2004, p. 83.

<sup>14</sup> Regulation (EC) No 258/97 of the European Parliament and of the Council of 27 January 1997 concerning novel foods and novel food ingredients, OJ L 43, 14.2.1997, p. 1.

<sup>15</sup> Regulation (EU) No 609/2013 of the European Parliament and of the Council of 12 June 2013 on food intended for infants and young children, food for special medical purposes, and total diet replacement for weight control and repealing Council Directive 92/52/EEC, Commission Directives 96/8/EC, 1999/21/EC, 2006/125/EC and 2006/141/EC, Directive 2009/39/EC of the European Parliament and of the Council and Commission Regulations (EC) No 41/2009 and (EC) No 953/2009, OJ L 181, 29.6.2013, p. 35.

For more information, see: [http://ec.europa.eu/food/food/index\\_en.htm](http://ec.europa.eu/food/food/index_en.htm)

### **3.5. Alignment of AH and PH conditions for certain composite products**

In the past, import of certain composite products needed to fulfil only animal health conditions.

However, Regulation (EU) No 28/2012<sup>16</sup>, applicable from 1 March 2012, aligns animal and public health requirements for certain composite products intended to be imported into or transited through the EU and lays down model health certificates for the import and transit of those composite products.

According to Regulation (EU) No 1079/2013<sup>17</sup>, in order to allow existing trade to continue, those composite products not covered by Regulation (EU) No 28/2012 can be imported under the current regime until 31 December 2016.

## **4. IMPORT CONDITIONS OF CERTAIN COMPOSITE PRODUCTS**

### **4.1. Origin of the processed products of animal origin (PPOAO) used for the production of the composite products**

According to Article 6(4) of Regulation (EC) No 853/2004, the PPOAO used to prepare imported composite products must satisfy the requirements of Article 6(1) to (3) of that Regulation. It means, in particular:

- The PPOAO shall originate from a third country or part thereof appearing on an EU list, and satisfy the product specific requirements applicable upon import in the EU,
- The PPOAO shall originate from an establishment (or production area for molluscs), which appears on an EU list of establishments for that PPOAO from which imports are permitted.

However, Regulation (EU) No 1079/2013 provides a transitional period until 31 December 2016 for the application of these public health measures. According to this Regulation, Article 6(4) of Regulation (EC) No 853/2004 is not applicable to composite products other than the following referred in Article 3(1) of Regulation (EU) No 28/2012 which are:

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<sup>16</sup> Commission Regulation (EU) No 28/2012 of 11 January 2012 laying down requirements for the certification for imports into and transit through the Union of certain composite products and amending Decision 2007/275/EC and Regulation (EC) No 1162/2009, OJ L 12, 14.1.2012, p.1.

<sup>17</sup> Regulation (EU) No 1079/2013 of 31 October 2013 laying down transitional measures for the application of Regulations (EC) No 853/2004 and (EC) No 854/2004 of the European Parliament and of the Council, OJ 292, 1.11.2013, p. 10.

- Composite products containing processed meat products, as referred to in Article 4(a) of Decision 2007/275/EC
- Composite products containing processed dairy products and covered by Article 4(b) and (c) of Decision 2007/275/EC
- Composite products containing half or more of their substance of processed fishery or egg products and covered by Article 4(b) of Decision 2007/275/EC.

The requirements for these composite products are laid down in the health certificates provided in the Annexes to Regulation (EU) No 28/2012, which combine the EU public and animal health certification.

In addition, any dairy products contained in any composite products not subject to veterinary checks in BIPs need to originate from a listed third country and must be treated as provided for in Annex I to Regulation (EU) No 605/2010. In accordance with Article 6(2) of Decision 2007/275/EC, this requirement is also applicable for the composite products described in Article 6(1) of and those listed in Annex II to Decision 2007/275/EC.

Consequently, the requirement that composite products containing half or more of their substance of **PPOAO other than processed meat, dairy, fishery or egg products** shall be accompanied by the relevant certificate or by a commercial document is not applicable until 31 December 2016.

This means that for composite products containing for example half or more of their substance processed honey, gelatine or snails only general EU public health rules (as detailed in Chapter 3.2 and 3.4 of this guidance document) are applicable and it is up to Member States to introduce additional national public health rules, such as certification requirements. For the aforementioned PPOAO (e.g. processed honey, gelatine, snails or processed products of animal origin other than meat, dairy, fishery or egg products) contained in composite products, there are no specific animal health conditions as they are considered to present no risk to animal health.

Regardless of the provisions of Regulation (EC) No 853/2004, the components of animal origin used for producing a composite product have to originate from a third country with an approved residue control plan for the specific component, as laid down in Annex I to Decision 2011/163/EU. This requirement is applicable to all PPOAO, including those which are covered by the transitional measures of Regulation (EU) No 1079/2013.

#### **4.2. Origin of composite products**

According to Regulation (EU) No 28/2012 the following composite products intended for import into or transit through the EU shall originate from approved third countries or part thereof authorised for the introduction into the EU of consignment of PPOAO contained in those composite products:

- Composite products containing processed meat products, as referred to in Article 4(a) of Decision 2007/275/EC
- Composite products containing processed dairy products and covered by Article 4(b) and (c) of Decision 2007/275/EC

- Composite products containing half or more of their substance of processed fishery or egg products and covered by Article 4(b) of Decision 2007//275/EC.

The above composite products shall be accompanied at introduction into the EU by the model health certificates laid down in the Annexes to Regulation (EU) No 28/2012.

While the PPOAO contained in the composite product shall originate from approved establishments, the composite product itself may originate from registered establishments which do not need to be listed in accordance with Article 12 of Regulation (EC) No 854/2004. However, if a final composite product is produced from an unprocessed primary animal product (e.g. fish fillets) and processing of that primary product is an integral part of the production of the final composite product (Article 2(a) of Decision 2007/275/EC), this processing has to take place in an approved establishment of the unprocessed animal product in question and, in such cases, the composite product has to originate from such an approved establishment.

#### **4.3. Triangular trade of composite products listed in Article 3(1) of Regulation (EU) No 28/2012**

Concerning the origin, there are some additional restrictions when the PPOAO and the relevant composite product is not made in the same country (triangular trade). These restrictions are laid down for the meat or dairy products used in the composite products, as the third country lists for those products are based on a certain heat treatments in relation to the animal health risk of the relevant third countries. Therefore, it is necessary to ensure that meat or dairy products from a third country with a high animal health risk are not sent to a third country with a lower animal health risk for the production of composite products. This is also reflected in the health guarantees which have to be attested in the health certificates laid down in the Annexes to Regulation (EU) No 28/2012.

**Table 1: Origin of the composite product listed in Article 3(1) of Regulation (EU) No 28/2012 and origin of the PPOAO used in those composite products**

<b>PPOAO in composite product</b>	<b>Country of origin of composite product</b>	<b>Country of origin of PPOAO contained in composite product</b>
<b>Meat product</b>	TC listed in Decision 2007/777/EC for any heat treatment	Same TC or EU origin
	TC listed in Decision 2007/777/EC as A	Same TC or EU origin or different TC, but listed for A in Decision 2007/777/EC
<b>Dairy product</b>	TC listed in Regulation (EU) No 605/2010 as A, B or C	Same TC or EU origin
	TC listed in Regulation (EU) No 605/2010 as A	Same TC or EU origin or different TC, but listed for A in Regulation (EU) No 605/2010
	TC listed in Regulation (EU) No 605/2010 as B	Same TC or EU origin or different TC, but listed for B in Regulation (EU) No 605/2010
<b>Processed fishery or egg product</b>	TC listed in relevant EU list	Same TC or EU origin or different TC, but listed in relevant EU list

Table 1 provides an overview of the origin of the composite products and the origin of the PPOAO contained in the relevant composite product in case of triangular trade.

In relation to dairy products, the specific animal health situation of third countries listed as acceptable for heat treatment C in Annex I to Regulation (EU) No 605/2010 has to be borne in mind. Triangular trade can only take place between third countries approved for



heat treatment A or third countries approved for heat treatment B to ensure that the trade does not take place between third countries with different animal health status. For that reason, third countries approved for heat treatment C can only accept dairy products from an EU Member State or from their own territory for the production of composite products containing dairy products.

The same is applicable for meat products and triangular trade can only take place between third countries approved for treatment A in Decision 2007/777/EC. All third countries not approved for that treatment can only accept meat products from an EU Member State or from their own territory for the production of composite products containing meat products.

## **5. IMPORT AND TRANSIT CONTROLS AT EU APPROVED BORDER INSPECTION POSTS**

EU legislation prescribes that all consignments of products of animal origin introduced into the territory of the Union must be presented at an EU approved border inspection post (BIP) to undergo mandatory veterinary checks. Council Directive 97/78/EC<sup>18</sup> sets out the veterinary procedures to be followed in order to import into or transit through the EU consignments of products of animal origin. The list of commodities of products of animal origin which should undergo veterinary checks is laid down in Annex I to Commission Decision 2007/275/EC.

Articles 4 to 6 of that Decision contain requirements for veterinary checks in BIPs for certain composite products and derogations from that requirement for other composite products including those listed in Annex II to that Decision. However, those composite products which are derogated from veterinary checks in BIPs, are in any case subject to the official control provisions described in Regulation (EC) No 882/2004<sup>19</sup> and Member States should verify at which stage in the distribution chain such controls are likely to produce the most meaningful result.

## **6. IMPORT CONTROLS OF CERTAIN COMPOSITE PRODUCTS**

Details to the general import procedure are provided in the aforementioned guidance document "Key questions related to import requirements and the EU rules on food hygiene and official food controls".

According to Article 4 of Decision 2007/275/EC, the following composite products are subject to veterinary checks at BIPs:

- Composite products containing processed meat products
- Composite products containing half or more of their substance of any one processed product of animal origin other than processed meat product

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<sup>18</sup> Council Directive 97/78/EC laying down principles governing the organisation of veterinary checks on products entering the Community from third countries, OJ L 24, 30.1.1998, p. 9.

<sup>19</sup> Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules, OJ L 165, 30.4.2004 and re-published in OJ L 191, 28.5.2004, p. 1.

- Composite products containing no processed meat product and less than half of their substance of processed dairy product where the final products do not meet the requirements of Article 6 of that Decision.

Article 4(b) of Decision 2007/275/EC refers to "any one processed product of animal origin other than processed meat product" contained in a composite product, which means that there can be more than one PPOAO in a composite product. In this case, such contents need to be summed up to know if the total amount of contained PPOAO is 50% or more in the composite product and therefore the relevant composite product is subject to a BIP control. For the total amount, all PPOAO other than processed meat products have to be considered.

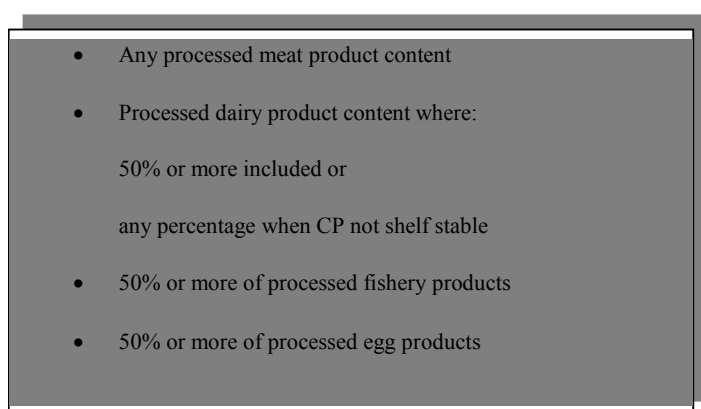
The BIP has to verify, where applicable, that the above composite products originate from a third country or part thereof authorised for the introduction into the Union of consignments of the PPOAO contained in those composite products and that they are accompanied by a health certificate in accordance with the model set out in Annex I or II to Regulation (EU) No 28/2012. For import into the Union, it shall be verified, where applicable, that the PPOAO of these composite products were produced in approved establishments in approved third countries, including the approved residue control plan (see Chapter 4 of this guidance document).

- Where a composite product contains only processed meat, milk, egg or fishery products and was produced in an establishment approved for that product and is accompanied by the relevant model certificate for that product, this could be acceptable as the health attestation in that processed product certificate provides for more health guarantees than the certificate under Regulation (EU) No 28/2012 in case only one type of PPOAO is included in the composite product.
- According to Article 3(1)(c) of Regulation (EU) No 28/2012, processed fishery products contained in composite products do not need to be certified in the model laid down in Annex I to Regulation (EU) No 28/2012, if their content is less than 50% in the composite product. The same reasoning is applicable for processed egg products for the models laid down in both Annexes to the same Regulation.
- However, any processed meat and/or dairy content in a composite product needs to be certified in the models laid down in the Annexes to Regulation (EU) No 28/2012, except in case of shelf stable composite products containing no meat product and less than 50% of dairy product and the final product meets the requirements of Article 6 of Decision 2007/275/EC.

Article 6 of Decision 2007/275/EC provides derogations for certain composite products and for foodstuffs listed in Annex II to that Decision to be exempted from veterinary checks at BIPs. In addition, Article 4(c), in conjunction with Article 6(1)(a) of Decision 2007/275/EC, provides a derogation for composite products which are shelf stable at ambient temperature or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance and are not containing any meat products, but containing less than half of their substance of **dairy product**. Such composite products shall be clearly identified as intended for human consumption, they must be securely packaged or sealed in clean containers and they shall be accompanied by a commercial document and labelled in an official language of a Member State, so that the 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 (Article 6(1)(a)(iv) of Decision 2007/275/EC).

- This means that composite products which are shelf stable at ambient temperature or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance and which contain dairy products and any other PPOAO need to be presented for veterinary checks to a BIP, if the total amount of PPOAO content is more than 50% of the composite product.
- The BIP needs to verify if the aforementioned composite products have been produced in accordance with the general public health requirements (Articles 3 to 6 of Regulation (EC) No 852/2004) and if the PPOAO in the composite product is originating from a third country with an EU approved residue control plan, in particular, if the dairy part contained in the composite products originates from a third country appearing on an EU list with the appropriate heat treatment provisions.

**Picture 2: certification of PPOAO content in certificates of Regulation (EU) No 28/2012**



The picture above illustrates which PPOAO content has to be certified in the certificates laid down in Regulation (EU) No 28/2012 for the relevant composite products.

Composite products which are not subject to veterinary checks at BIPs have to be controlled regularly on the basis of **the multi-annual national controls plans** drawn up in accordance with Articles 41 to 43 of Regulation (EC) No 882/2004 and in the light of potential risks, as provided for by Article 15(1) of same Regulation. Member States should decide which competent authority should be responsible for such controls and at which stage of the distribution chain such controls are likely to produce the most meaningful result for composite products originating from third countries. Further details to these controls are laid down in Article 15 and 16 of the above Regulation.

In any case, food business operators have the responsibility to guarantee the compliance of imported consignments and to provide the relevant documented evidence in case of control by the competent authorities in Member States.

If composite products are considered to be **pharmaceutical/medicinal products** or not depends if they fulfil the definition of medicinal products as defined in Article 1(2) of Directive 2001/83/EC<sup>20</sup>.

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<sup>20</sup> Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use, OJ L 311, 28.11.2001, p. 67.

According to the case law of the European Court of Justice, the classification of any given product as a pharmaceutical/medicinal product must be carried out based on a case-by-case analysis taking into account all the characteristic of the product and carried out by the competent national authorities, subject to review by the courts. It should be taken into account that Article 2(2) of Directive 2001/83/EC provides that if a product falls within the definition of a product covered by other Community legislation the provisions of the pharmaceutical/medicinal legislation shall apply. The European Court of Justice has also declared that it cannot be ruled out that, in the present state of harmonisation, differences will exist in the classification of products as between Member States. If the conditions for the recognition as pharmaceutical/medicinal products are fulfilled, composite products do not need to be presented to BIPs.

Where composite products could not be considered as pharmaceutical/medicinal products, as defined in Directive 2001/83/EC, they could be considered as food supplements, where they comply with the definition provided in Article 2 of Directive 2002/46/EC<sup>21</sup> and all the relevant provisions of the EU food law need to be respected. This is also applicable for dietary foods for special medical purposes (Article 1(2)(b) of Commission Directive 1999/21/EC<sup>22</sup>) and foodstuffs for particular nutritional use (Article 1(2) of Directive 2009/39/EC<sup>23</sup>), which will be replaced as of 20 July 2016 with "food for specific groups" (see Chapter 2.5 of the guidance document). In addition, depending on the content of processed animal products in such products, public and animal health conditions need to be complied with and such products have to be presented to the BIP for import/transit controls together with the composite product certificate.

The following table provides an overview of the different composite products and if they are subject to veterinary checks in BIPs or official controls under Article 15 of Regulation (EC) No 882/2004. The table details as well for which composite products and their ingredients animal and public health conditions have been laid down by the EU legislation (see also Chapter 4 of this guidance document).

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<sup>21</sup> Directive (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods, OJ L 404, 30.12.2006, p. 9.

<sup>22</sup> Commission Directive 1999/21/EC of 25 March 1999 on dietary foods for special medical purposes, OJ L 91, 07.04.1999, p. 29.

<sup>23</sup> Directive 2009/39/EC of the European Parliament and of the Council of 6 May 2009 on foodstuffs intended for particular nutritional uses, OJ L 124, 20.05.2009, p. 21.

**Table 2: Official controls of composite products originating from third countries and introduced into the EU**

<b>Composite products containing 50% or more of their substance of any PPOAO (if more than one, to sum up)</b>			
	Meat products		all
	Dairy products		veterinary
	Egg products		checks
	Processed fishery products		in
	Other PPOAO*, honey, gelatine, snails etc.		BIP
AH and PH conditions – certificate of Regulation (EU) No 28/2012			
<b>Composite products containing less than 50% of their substance of any PPOAO (if more than one, to sum up)</b>			
<b>Not shelf stable composite products</b>		<b>Shelf stable composite products (heat treated)</b>	
Meat products	veterinary checks in BIP	Meat products	veterinary checks in BIP
Dairy products#	veterinary checks in BIP	Dairy products	882 controls, listed third country
Egg products*	882 controls	Egg products*	882 controls
Processed fishery products*	882 controls	Processed fishery products*	882 controls
Other PPOAO*, honey, gelatine, snails etc.	882 controls	Other PPOAO*, honey, gelatine, snails etc.	882 controls
For meat and dairy products: AH and PH conditions – certificate of Regulation (EU) No 28/2012		For meat products: AH and PH conditions – certificate of Regulation (EU) No 28/2012 For all other PPOAO, including dairy, egg and processed fishery products: commercial document as in Article 6(1)(a)(iv) of Decision 2007/275/EC	

# *if heat treated throughout the substance so that any raw product is denatured, no veterinary check in BIP, but 882 control is applicable*

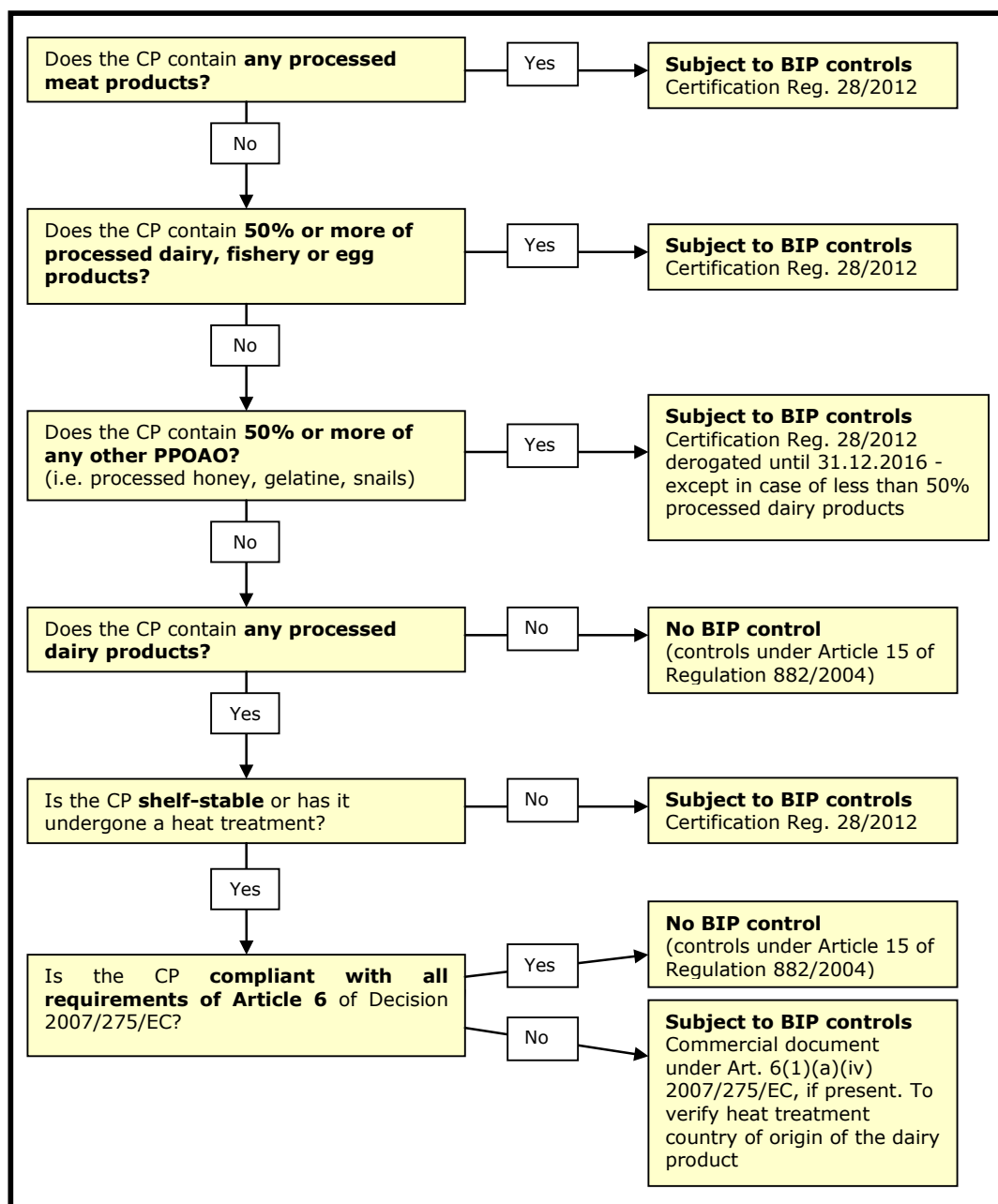
\* *no AH conditions laid down for these PPOAO but general EU PH rules (see Chapter 3.2 and 3.4 of this guidance document) and specific national PH conditions, e.g. certification; applicable until 31 December 2016;*

Any dairy products contained in any composite products not underlying veterinary checks in BIPs need to originate from a listed third country and must be treated as provided for in Annex I to Regulation (EU) No 605/2010.

The components of animal origin used for producing any composite product have to originate from a third country with an approved residue control plan for the specific animal components, as laid down in Annex I to Decision 2011/163/EU.

A decision tree can be useful to simplify the decision for importers and competent authorities on whether a composite product has to be presented to a BIP for import controls or not. Picture 3 details such a decision tree.

**Picture 3: Decision tree for composite products for human consumption subject to import controls in BIPs and certification**



Any processed meat and/or dairy content (where the dairy content constitutes 50 % or more or is less than 50 % and the composite product is not shelf stable at ambient temperature or heat treated throughout their substance) in a composite product needs to be certified in the models laid down in the Annexes to Regulation (EU) No 28/2012.

## 7. EXAMPLES FOR THE APPLICATION OF THE CONDITIONS AND CONTROLS

Some examples of composite products and PPOAO are detailed in Annex III to this guidance document. However, these examples are drafted taking into account case-by-case basis decisions depending on the products and their ingredients and can therefore not be considered as a general rule.

### 7.1. Composite products listed in Annex II to Decision 2007/275/EC

Composite products listed in Annex II to Decision 2007/275/EC do not need to be presented for veterinary checks to BIPs. However, they have to be produced in accordance with the general public health requirements (Articles 3 to 6 of Regulation (EC) No 852/2004) and the PPOAO in the composite product has to originate from a third country as listed for the relevant animal product in Annex I to Decision 2011/163/EU, with an approved residue control plan.

The EFSA has evaluated the public health risk of these composite products and has presented their opinion in a report published on:

<http://www.efsa.europa.eu/en/efsajournal/pub/2662.htm>

The EFSA opinion presents a review of the quantitative microbiology models and databases that can be used to provide quantitative estimations of the impact of temperature, pH, water activity, processing, duration of storage and their combinations on the survival and growth of the main bacterial pathogens.

Composite products contain several ingredients with different composition. It is concluded that migration and diffusion of moisture and substances among the ingredients may change their physico-chemical parameters, particularly at the interfaces. Therefore, the assessment of the risk posed by composite products needs to consider the combinations of parameters most permissive to survival and growth of pathogens. More information is available on the above website.

### 7.2. Examples of composite products

#### 7.2.1. *Containing meat products*

All composite products containing meat products have to be presented for veterinary checks to BIPs and need to be accompanied by the certificate laid down in Annex I to Regulation (EU) No 28/2012 with the part II.2.A of the Health Information filled in, if they are intended to be imported. For transit part II.1.A of the certificate laid down in Annex II to that Regulation needs to be filled in.

- While a pizza with salami and cheese has to originate from a registered establishment, a pizza with minced meat or unprocessed fishery products which has been heat treated has to originate from an approved establishment. However, both consignments need to be accompanied by the above mentioned composite product certificate.
- A non-heat treated pizza with minced meat or unprocessed fishery products remains a non-processed product of animal origin, so it needs to originate from an approved establishment and to be accompanied by the model health certificate for minced meat or fishery products.

- For composite products containing meat products and processed fishery or egg products, only part II.2.A (part II.1.A for transit) of the Health Information of the above certificates has to be filled in when the content of fishery or egg products is less than 50%. As soon as the content of fishery or egg products is more than 50%, also part II.2.C or II.2.D (part II.1.C for egg products in the case of transit) has to be filled in, in addition to part II.2.A.

#### 7.2.2. *Containing dairy products*

Composite products containing 50% or more of their substance of dairy products and composite products which are not shelf stable and contain less than 50% of their substance of dairy products need to be presented for veterinary checks to BIPs. They need to be accompanied by the certificate laid down in Annex I to Regulation (EU) No 28/2012, with the part II.2.B of the Health Information filled in. In case of transit, part II.1.B of the Health Information in the certificate in Annex II to the same Regulation needs to be filled in.

#### 7.2.3. *Containing any other PPOAO*

Composite products containing 50% or more of their substance of processed fishery or egg products need to be presented for veterinary checks to BIPs. They need to be accompanied by the certificates laid down in the Annexes to Regulation (EU) No 28/2012 with the relevant part (part II.2.C or part II.2.D) of the Health Information filled in.

Composite products containing 50% or more of their substance of any one PPOAO other than processed meat, dairy, fishery or egg products, need to be presented to the BIP for veterinary checks. However, no animal health conditions exist for those and due to the transitional period in Regulation (EU) No 1079/2013, public health conditions are not yet applicable, except national requirements.

In case there are several PPOAO contained in a composite product, those need to be added up and if more than 50% are reached, the composite product has to be presented for veterinary checks to a BIP.

## **8. GENERAL AND SPECIFIC INFORMATION ON IMPORT AND TRANSIT CONTROLS**

General information regarding the import conditions for animal products into the Union is available on the DG SANCO website under:

[http://ec.europa.eu/food/animal/animalproducts/index\\_en.htm](http://ec.europa.eu/food/animal/animalproducts/index_en.htm)

More general and specific information on import controls is available on the DG SANCO website for veterinary border controls under:

[http://ec.europa.eu/food/animal/bips/index\\_en.htm](http://ec.europa.eu/food/animal/bips/index_en.htm)



**Classification in accordance with activities**

<b>Activity</b>	<b>Regulation (EC) No</b>	<b>Risk</b>	<b>Non-exhaustive list of examples</b>
Assembly of food of plant origin with processed food of animal origin further processed together.	853/2004	The risk associated can be controlled by implementing the rules of Regulation (EC) No 853/2004.	<ul style="list-style-type: none"> <li>• Canning food made from processed meat with vegetables</li> <li>• Cooking of pizzas containing processed ingredients of animal origin (such as cheese, processed fish or processed meat)</li> <li>• Producing soup made with meat extract</li> </ul>
Assembly of food of plant origin with processed food of animal origin, and placed on the market as such.	852/2004	The risk associated can be controlled by implementing the rules of Regulation (EC) No 852/2004.	<ul style="list-style-type: none"> <li>• Making sandwiches with ham or cheese</li> <li>• Manufacturing edible ices made from processed milk (heat treated milk, milk powder)</li> <li>• Making bakery products with dairy products</li> <li>• Assembling ready to eat meals composed of processed products of animal origin (e.g. processed meat) and vegetables</li> <li>• Manufacturing confectionery (e.g. chocolate containing processed milk)</li> <li>• Producing mayonnaise made with egg product</li> </ul>

<p>Assembly of food of plant origin with unprocessed food of animal origin further processed together.</p>	<p>853/2004</p>	<p>The risk is identical to the one posed when manufacturing processed food of animal origin, e.g. meat products. This justifies that the rules of Regulation (EC) No 853/2004 should apply. Approval of premises is required by EU rules and an identification mark must be applied to such foods.</p>	<ul style="list-style-type: none"> <li>• Canning products made from vegetables and fresh meat</li> <li>• Ice cream from raw milk</li> </ul> <p><b>See remarks made under Chapter 2.1 of this guidance document</b></p>
<p>Assembly of food of plant origin with unprocessed food of animal origin and placed on the market as such.</p>	<p>853/2004</p>	<p>The risk is identical to the one posed when handling raw products of animal origin, e.g. fresh meat etc. Approval of premises is required by EU rules and an identification mark must be applied to such foods.</p>	<ul style="list-style-type: none"> <li>• Assembling raw meat/fish skewer with vegetables</li> </ul>

### Non-exhaustive list of processed products of animal origin (PPOAO)

Processed products\* are obtained by any action substantially changing the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.

**PPOAO include:**

- Meat products (ham, salami, etc.)
- Processed fishery products (smoked fish, marinated fish etc)
- Dairy products (heat treated milk, cheese, yoghurt, etc.)
- Egg products (egg powder etc.)
- Rendered animal fat
- Greaves
- Gelatine
- Collagen
- Treated intestines, stomachs and bladders etc.

**PPOAO also include:**

- Combinations of processed products, e.g. cheese with ham (see Chapter 2.2.2 of this guidance document)
- Products that have undergone several processing operations, e.g. cheese from pasteurised milk.

**Substances to give special characteristics (e.g. flavour, sweetness, colour, texture) or for technical purposes may be added, for example:**

- sausage with garlic
- yoghurt with fruit
- cheese with herbs or breaded cheese
- dairy ice cream with chocolate
- canned fish fillet in oil
- cooked mussels with garlic butter
- surimi with egg parts
- fried battered fish




\* as defined in Article 2(1)(m) of Regulation (EC) No 853/2004





**Remarks:**




**PPOAO** may include certain meat preparations such as marinated and cured meat.  
**PPOAO** need to originate from approved establishments.



## Examples of composite products and PPOAO

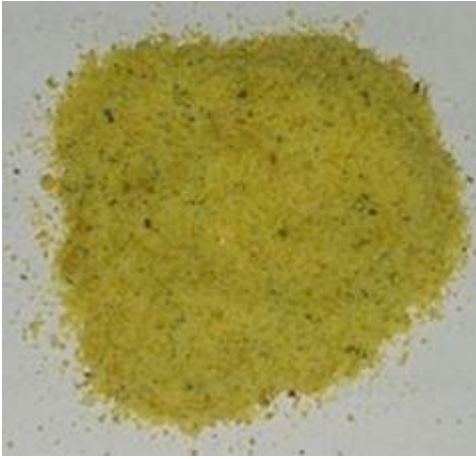


This list of examples is drafted taking into account case-by-case basis decisions, depending on the products and the ingredients of the relevant products and cannot be considered as a general rule.

Picture	CN code*	Product information	Comments
	1604 14 11	Tuna steak in sunflower oil:  Ingredients: skipjack tuna (Katsuwonus pelamis), sunflower oil and salt	Fishery product, subject to BIP checks, fishery product certificate and origin from approved establishment is required.
	1604 15	Mackerel in tomato sauce  Ingredients: jack mackerel, tomato sauce, water and salt	Fishery product, subject to BIP checks, fishery product certificate and origin from approved establishment is required.
	1904 90 10, if fish content is less than 20%  1604 (frozen or not), if fish content is more than 20%	Sushi  Ingredients: fish, sushi rice, palm leaves, and others.	Fishery product as contains or is based on raw fish, subject to BIP checks, fishery product certificate and origin from approved establishment is required.  In case, egg products are added, an additional certificate for egg products has to be provided.




	1604 20 10	<p>Salmon Sweet and Sour salad, 185 gr</p> <p>Ingredients: pink salmon (55gr), sweet and sour sauce (tomato sauce, water, vinegar, soybean oil, sugar, modified starch, salt, vegetable extract), tomato, sweet corn, onion, green bell pepper, baby corn, flavour enhancer (E621), paprika colour (E160c)</p>	<p>Composite product</p> <p>Not subject to BIP checks as less than 50 % fishery products</p> <p>As it is produced from unprocessed fish (Article 2(a) of Decision 2007/275/EC), it must come from an approved establishment and from an approved third country.</p>
	1602 50 31	<p>Corned Beef</p> <p>Ingredients: cooked beef (72%), beef (24%), salt, sugar, water and preservative (Sodium Nitrite – E250)</p>	<p>Meat product, subject to BIP checks, meat product certificate and must originate from approved establishment and approved third country with the required treatment (Decision 2007/777/EC).</p>
	1602 50 95	<p>Canned Minced Beef</p> <p>Ingredients: beef (75%), water, onions, wheat flour, tomato puree, beef extract, salt, corn flour, sugar, natural colour (plain caramel), natural onion flavour, maltodextrin and white pepper</p>	<p>Meat product as the plant ingredients just add special characteristics; subject to BIP checks, meat product certificate and must originate from approved establishment and from approved third country with the required treatment (Decision 2007/777/EC).</p>
	1902 20	<p>Beef Lasagne</p> <p>Ingredients: minced beef, vegetables and pasta with a béchamel sauce topping containing milk and cheese. Final product has been cooked.</p>	<p>Composite product, subject to BIP checks and composite product certificate which must be filled in for meat and dairy content.</p>





	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Canned Chili with beans,</p> <p>Ingredients: water, beef, beans, concentrated crushed tomatoes, 2% or less of corn flour, textured vegetable protein (soy flour, caramel color), salt, chili powder, flavouring, sugar, starch, spices, green chiles, onions, jalapeno peppers. Final product has been cooked.</p>	<p>Composite product, subject to BIP checks, composite product certificate from approved establishment and approved third country with the required treatment (Decision 2007/777/EC) as produced from raw beef.</p>
	<p>1604</p>	<p>Frozen Fried Thai Fish Cake</p> <p>Ingredients: fish fillet (69%), beans (9%), water (7%), tapioca starch (5%), red curry past (5%), sugar (2%), salt (1,5%), flavour enhances (0,9%), kiffir lime leave (0,3%), egg white powder (0,2%), phosphate (0,1%)</p>	<p>Fishery product (similar to cooked surimi) as produced from raw fish and plant ingredients add special characteristics. Subject to BIP checks, origin from approved establishment and fishery product certificate is required.</p> <p>The small amount of egg white powder has a technological function, as it is necessary for the manufacture and does not need to be certified, but the food business operator has to ensure that it comes from an approved establishment and third country.</p>
	<p>2106 90 98</p>	<p>Paneer Poppers, frozen</p> <p>Ingredients: cheese coated with bread crumbs</p> <p>Paneer is fresh cheese similar to curd, but final product has been cooked.</p>	<p>Dairy product, as bread crumbs add special characteristics; subject to BIP checks, approved establishment and dairy certificate depending on heat treatment requirement (B or C) of the third country of origin is required.</p>




	<p>2106 90 98</p>	<p>Paneer Bhurji Roll, frozen, filled with vegetables and paneer (a type of fresh cheese similar to cottage cheese). Final product has not been cooked.</p>	<p>Composite product, subject to BIP checks, even if it contains less than 50% milk product as cheese is fresh (not shelf stable at ambient temperature).</p>
	<p>1602 32</p>	<p>Chicken en croute, frozen: Ingredients: 42% cooked chicken, puff pastry, 9% mango, sugar, 2% pak choi, palm oil, spices.</p> <p>Cooked chicken that has been wrapped in pastry dough and backed in the oven.</p>	<p>Composite product, subject to BIP checks and it can come from registered establishment.</p> <p>If raw chicken has been wrapped with the pastry dough and then backed, the processing establishment needs to be approved.</p>
	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Hamburger with beef burger, cheese, tomato and salad</p>	<p>Composite product, subject to BIP checks, composite product certificate filled in for meat and dairy part.</p> <p>If produced from raw meat, it needs to come from an approved establishment and approved third country with required treatment (Decision 2007/777/EC).</p>
	<p>1605</p>	<p>Breaded King Prawns</p> <p>raw prawns, frozen, battered with bread crumb coating;</p>	<p>Fishery product, as the prawns are raw, subject to BIP checks and certificate for fishery products is required.</p>




	<p>1603 00 10</p>	<p>Granulated Chicken Bouillon</p> <p>Ingredients: food additives (monosodium glutamate, nucleotide seasonings, food flavour, vitamin B2), salt rice powder, chicken meat, egg, curry powder (contains turmeric), chive, garlic, white dextrin.</p> <p>Shelf stable</p>	<p>No pieces of meat, just granules which dissolve in hot water.</p> <p>Composite product, but not subject to BIP checks as in Annex II to Decision 2007/275/EC. However, general food hygiene requirements such as approved third country approved residue control plan and approved establishment for the chicken meat contained in the bouillon need to be respected.</p>
 <p>Contains two sachets of cod roe seasoning and two packets of dried seaweed</p> <p>Shelf stable</p>	<p>2103 90 90</p>	<p>Sauce Cod Roe:</p> <p>Ingredients of sauce packet: salted cod roe; shortening (canola oil, palm oil), salt, monosodium glutamate, sugar, hydrolysed protein (soybean, wheat, corn, fish), cochineal extract, disodium guanylate, disodium inosinate, lactose (milk)</p>	<p>Composite product, not subject to BIP checks, as shelf stable at ambient temperature and less than 50% of PPOAO.</p> <p>The fish and milk used in the composite product need to come from approved third countries, which also have approved residue control plans, and from approved establishments.</p>
	<p>2106 90 98</p>	<p>Instant drink powder, shelf stable</p> <p>Contains 48% milk solids, sugar, peanut oil, maltodextrin, caramel, mineral mix and other ingredients.</p>	<p>Dairy product, as plant ingredients add special characteristics; subject to BIP checks, origin from approved establishment and approved third country including approved residue control pan and appropriate heat treatment is required.</p>





	2202 90 99	<p>Coffee-Drink:</p> <p>Ingredients: water, sugar, skim milk powder (2%), whole milk powder (3,7%), coffee-extract (0,6%, 6,0 g/l), vanilla extract, E473, E475, E322, E407, increased caffeine contents: 30 mg/100 ml;</p>	<p>Composite product and not subject to BIP checks, as dairy content below 50% and shelf stable at ambient temperature.</p> <p>However, origin of the dairy content from approved third country and approved establishment including approved residue control plan is required.</p>
	2105 00	<p>Vanilla flavoured ice cream with wafer and hazelnuts</p> <p>Ingredients: water, sugar, milk solids, refined palm kernel oil, glucose syrup, hazelnuts, emulsifier, stabilizers, artificial flavouring, chocolate compound, wafer</p>	<p>Composite product, if produced without involving a heat treatment, may origin from registered establishment, subject to BIP checks, as not shelf stable.</p> <p>Dairy product, if processed involving a heat treatment, origin from approved establishment, subject to BIP checks and certificate for dairy products is required.</p> <p>In both cases, dairy content from approved third country and approved establishment including approved residue control plan is required.</p>
	2208 70	<p>Cream liqueurs</p> <p>Ingredients: usually made with fruits, coffee, alcohol, milk, milk powder, egg yolk and/or cream</p> <p>Shelf stable at ambient temperature</p>	<p>Composite product and the dairy part included shall only be derived from, and be treated as provided for in the list of approved third countries for dairy products.</p> <p>Not subject to BIP checks, if less than 50% of animal origin content.</p>

	2103 90 90	Fish sauce: Codex Standard: STAN 302/2011 defines fish sauce as obtained from fermentation of a mixture of fish and salt (and water).	Fishery product with fishery product certificate, subject to BIP checks independent from amount of fish.
	2103 90 90	Flavouring containing e.g. 40% fish sauce and water	Fishery product, subject to BIP checks, fishery product certificate is required.  It would be a composite product, if also vegetable parts are added. Adding only water does not make it a composite product.
	2103 90 90	Oyster sauce  Ingredients: oyster extract, 30% soy sauce, brine and seasonings	Composite product under Annex II to Decision 2007/275/EC and not subject to BIP checks.
	1517 90 99	Food additive, microencapsulated tuna oil powder Ingredients: containing 48% highly refined and deodorized tuna oil, 15% casein, dextrose, dried glucose syrup, sodium ascorbate, lecithin and others.  Shelf stable	Composite product, subject to BIP checks, dairy and fish part of the composite certificate needs to be filled in and third country of origin of the composite product approved for both.

	<p>2106 90 92</p>	<p>Tablets, <u>not packaged for the final consumer</u></p> <p>Ingredients for each tablet: Glucosamine sulphate (wild fish origin): 34.6% of total ingredients</p> <p>Chondroitin (poultry origin): 27.7% of total ingredients</p> <p>~38% of the tablets consist of plant materials.</p>	<p>Composite product, subject to BIP checks, meat and fish part of the composite certificate needs to be filled in and third country of origin of the composite product approved for both.</p> <p>If originating from China, attestation for Chloramphenicol etc. as provided for in Decision 2002/994/EC is required.</p>
	<p>1602</p>	<p>Tandoori-Yakitori-Skewer</p> <p>Ingredients: meat marinated in yoghurt, milk, salt, spices, olive oil, then roasted, charcoal grilled and frozen</p>	<p>Meat product, subject to BIP checks, meat product certificate required and food business operator to ensure milk and yoghurt from approved establishments/third countries.</p>
	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Egg and bacon breakfast burrito:</p> <p>Ingredients: filling with scrambled egg, bacon, cream, cheese, honey</p> <p>Tortilla made of flour, milk powder etc.</p>	<p>If raw eggs are used, PPOAO as the tortilla wrap was not heat treated with the PPOAO. The burrito has to originate from an approved establishment with health certificates for all different animal product ingredients used.</p> <p>If egg products are used, composite product and the burrito may originate from a registered establishment with the composite product certificate filled in for all animal product ingredients used.</p> <p>In both cases subject to BIP checks.</p>

	<p>1604, if fish content is more than 20%</p> <p>2106, if fish content is less than 20%</p>	<p>Gefilte fish in a glass with gelatinous clear liquid:</p> <p>Ingredients: water, carp, egg whites, white fish, mullet, sugar, carrots, salt, cottonseed oil, onion, pike, potato starch, carrageenan, pepper, natural flavourings</p>	<p>Fishery product (similar to cooked surimi), produced from raw fish and plant ingredients add special characteristics. It needs to originate from an approved establishment.</p> <p>Subject to BIP checks with the fishery product certificate. No certificate for egg whites, which have a technological function, as they are necessary for the manufacture, and the food business operator has to ensure they originate from approved sources.</p>
	<p>1901 90</p>	<p>Powder product for omelette</p> <p>Ingredients: milk proteins, egg white powder, egg powder (20%), salt, aromas, herbs (0,5%), dye, spices, anti caking</p> <p>Herbs are added to give special flavour.</p>	<p>Mixed product of animal origin (dairy product and egg product), subject to BIP checks, origin from approved establishment for both product types and health certificate for dairy and for egg products is required.</p>
	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Meat salad</p> <p>Ingredients: meat sausages, eggs, onions, pickles, parsley, dressing (mayonnaise type)</p>	<p>Composite product, subject to BIP checks, meat and egg part of the composite certificate needs to be filled in and third country of origin of the composite product approved for both.</p>

	<p>1901, as it contains vanillin</p> <p>0402, if it would not contain vanillin</p>	<p>Dulce de Leche</p> <p>Ingredients: low fat milk (49%), sugar (48%), vanillin (2%), sodium bicarbonate (Baking Soda 1%) and potassium sorbate as a preservative (less than 1/10 of 1%)</p>	<p>Dairy product, as plant ingredients add special characteristics; subject to BIP checks, origin from approved establishment and approved third country including approved residue control pan and appropriate heat treatment is required.</p>
	<p>2309 10</p>	<p>Tuna with mais, Canned petfood</p>	<p>Pet food, which is an animal-by product and subject to BIP checks. Composite products cover only food for human consumption and the rules are not relevant to animal-by products.</p>

\* the complete CN code cannot be determined in cases the description, ingredient list and production process of the product is incomplete