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Brussels, 05 January 2026

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WORKING DOCUMENT

From:	European Commission
To:	Trade Policy Committee (Deputies)
Subject:	Sanitary market access to Brazil: Brazil reaction to the changes in the identification and health marking of products of animal origin in the EU, and responsibilities in the EU related to the registration of products of animal origin



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR TRADE AND ECONOMIC SECURITY

Directorate D – The Americas, Agriculture and Food Safety
Agriculture, Food and Sanitary and Phytosanitary Matters

Brussels, 5 January 2026
TRADE.D.3/ [redacted] /ir (2025)14331076

SENSITIVE*

NOTE FOR THE ATTENTION OF THE TRADE POLICY COMMITTEE

SUBJECT: *Sanitary market access to Brazil: Brazil reaction to the changes in the identification and health marking of products of animal origin in the EU, and responsibilities in the EU related to the registration of products of animal origin*

ORIGIN: European Commission, DG Trade and DG Sante

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COPIED TO: Potsdam group Roosendaal group

OBJECTIVE: *For information*

REMARKS:

In the previous note sent on 3 December 2025 to the TPC, Potsdam and Roosendaal (ref. WK 16797/2025), the Commission informed Member States about the October 2025 Brazilian officials visit to the EU on the registration of products of animal origin. As a result of the visit, a presentation about the organization of the Brazil service responsible for the registration of products and guidance documents are available in the MADB's "Import Requirements" sub-section (available to Member States and EU and national business organizations).

In this note, the Commission would like to:

- 1) Share with Member States a clarifying reply letter that Brazil has sent to the Commission on 18 December 2025 about the changes in the EU of the *identification and health marking of products of animal origin imported from the EU* (the clarifications are useful because several Member States have

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already decided to switch to the new identification/markings, ahead of the 2028 implementation date). Also, the letter is accessible in the MADB's sub-section "Import requirements".

- 2) Remind Member States that, after the approvals and the permanent pre-listing to products of animal origin, communicated by Brazil in November 2025 (as mentioned in the note to the TPC, Potsdam and Roosendaal of 21 November 2025, ref. WK 15993/2025), the ***relevant Member States can immediately send to Brazil their updated lists of establishments, including in them the establishments that comply with the applicable Brazil import requirements – without having to be audited in advance by Brazil.***
- 3) Bring to the attention of Member States the fact that ***Brazil may audit Member States in the future*** to verify the compliance with the Brazil import requirements, namely those included in the bilateral health certificates agreed between Brazil and Member States. During the audits, among any of their import requirements, Brazil may verify the requirement related to the ***registration of products with the Department of Inspection of Animal-Origin Products (DIPOA) of the Ministry of Agriculture, Livestock, and Supply (MAPA) of Brazil.***

The Commission understands that, even if the responsibility to register products of animal origin falls under the remit of the businesses (only businesses have access to the Brazil online product registration platform PGA-SIGSIF), during such audits to Member States, Brazil may require the competent authorities to demonstrate what type of controls they have put in place to be able to sign the certificates.

MARKET ACCESS DATABASE (MADB)

This note, the previous notes to the TPC, Potsdam and Roosendaal, and the letter received from Brazil on 18 December 2025 are available in the respective subsections of the MADB, at <https://madb2.tradenet.ec.europa.eu/>².

Enclosure: Letter from Brazil of 18 December 2025 on the identification and health marking of products of animal origin from the EU

⁽¹⁾ In the "MADB/SPS User Guide" (available at the bottom of all the SPS sections of the MADB), Member States will find details on: **a)** how to obtain a new account (login/password); **b)** contact lists, **c)** guidance how to complete the "SPS matrices" and "audits"; **d)** how to subscribe to receive automatic notifications of new entries; and **e)** the types of SPS documents, their intended uses and access (read, modify) permissions. Member States officials wishing to gain or regain access to the MADB are invited to send a request to TRADE-SERVICE-DESK@ec.europa.eu.



MINISTÉRIO DA AGRICULTURA E PECUÁRIA
SECRETARIA DE COMÉRCIO E RELAÇÕES INTERNACIONAIS
COORDENAÇÃO-GERAL DE GESTÃO DOS ADIDOS AGRÍCOLAS
ADIDO UE

Letter 108/2025/BRU/CGAAG/SCRI-MAPA

Brussels, 18 December 2025.

To:

[REDACTED]

Bilateral International relations (SANTE.A.5)
DG-SANTE

C.c.

[REDACTED]

Bilateral International relations (SANTE.A.5)

[REDACTED]

Agriculture, Food & Sanitary & Phytosanitary Matters (TRADE.D.3)

Subject: Identification and health marking of products of animal origin from the EU.

Dear Colleagues,

In the opportunity to transmit my respects, I refer to the changes in EU requirements regarding the identification and health marking of products of animal origin from the EU communicated by this Directorate-General through letter Ref. Ares(2024)8398571, dated November 26, 2024.

2. In response to this correspondence, I would like to inform you that the technical department of the Brazilian Ministry of Agriculture and Livestock (MAPA) considers that there will be no impact on imports, even though, until December 31, 2028, there may be different abbreviations on similar animal products originating from the same EU Member State.

3. Nevertheless, the technical department of MAPA emphasizes that European exporting establishments must update the registration of their products, ensuring compatibility between the label presented on the product at the time of import and the sketch entered in the PGA-SIGSIF system, in accordance with Brazilian legislation, specifically Portaria SDA No. 558, of March 30, 2022, transcribed below in free translation:

"SDA ORDINANCE No. 558, OF MARCH 30, 2022 - which approves the procedures for registration, alteration, audit, and cancellation of registration of edible animal products manufactured by establishments registered with the Department of Inspection of Animal Products, of the Secretariat of Agricultural Defense, and by

Art. 11. The information contained in the product registration process must correspond to the procedures performed by the establishment.

Art. 12. No changes to the formulation, manufacturing process, or label may be made without first updating the information contained in the registration in the computerized system provided for in this Ordinance.

Sole paragraph. Establishments must keep their records up to date, including the attached documentation, in accordance with current regulations."

Please do not hesitate to contact us should you have any queries.

Receive my best regards,

[Redacted signature]

Mission of Brazil to the European Union



Documento assinado eletronicamente por [Redacted],
Adido(a) Agrícola, em 18/12/2025, às 09:24, conforme horário oficial de Brasília,
com fundamento no art. 4º, § 3º, do [Decreto nº 10.543, de 13 de novembro de 2020](#).

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https://sei.agro.gov.br/sei/controlador_externo.php?acao=documento_conferir&id_orgao_acesso_externo=0, informando o código verificador **49156377** e o código CRC **4FB558FB**.