



Importing Animal By-Products from the European Union into Great Britain

Frequently Asked Questions

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Animal By-Products (ABP)

What is an Animal By-Product?

Animal by-products are products that are of animal origin but that are not for human consumption.

What changes are coming into force for ABP in January and July 2022?

From 1 January 2022, the importer in Great Britain (or a representative acting on their behalf) must pre-notify the authorities about [imports of ABP](#) using the [IPAFFS](#) system.

From 1 July 2022, goods must be accompanied by a certified Export Health Certificate (EHC). Goods must also come in through a point of entry with a [Border Control Post](#) (BCP) that is designated to receive those goods.

Note that import requirements, including EHCs, are already in place for [a small number of high risk animal by-products](#).

Do we have to be registered on Traces NT to import goods from the EU to GB?

No. Traces is an EU system. Importers must register for and submit a pre-notification via IPAFFS in order to be able to import ABP from the EU.

Is there a list of ABP subject to veterinary checks?

Check if the CN code for your product is listed in Regulation 2019/2007 to find out if your ABP commodity is subject to official controls at a BCP. Note that this list is not exhaustive. Please refer to [the model health certificates](#) or Import Information Notes (IINs) for guidance on whether an ABP commodity is permitted to be exported into GB and what veterinary checks are required.

You can also get advice from the competent authority in the EU Member State from which you will be exporting.

Are samples of ABP subject to Sanitary and Phytosanitary (SPS) import controls?

SPS import requirements will apply to samples, whether intended for human consumption or not. There are some cases in which the import of some trade samples can be permitted under an authorisation/licence. This authorisation sets conditions which will limit what can be done with the sample, e.g., a product for human consumption being taste tested by employees of the importing company only.

If you wish to import samples, you should contact the [Animal and Plant Health Agency](#) (APHA), who can provide details and clarification on any authorisations or licence you may require.



Is a UNN required for imports of ABP?

No. A UNN will not be required on the Export Health Certificate for ABP.

IPAFFS

What is IPAFFS?

IPAFFS is the import of products, animals, food and feed system (IPAFFS) and is the system used to pre-notify the authorities about arrival of imports of live animals, animal products and high-risk food and feed not of animal origin.

It is the responsibility of the GB importer (or a representative acting on their behalf) to register for IPAFFS to pre-notify the relevant authority of the goods' arrival.

Can a customs agent submit the IPAFFS declaration on the importer's behalf?

Yes. You can employ an agent to act on your behalf to submit notifications on your behalf.

How do I register to use IPAFFS?

You will need to set up a Government Gateway account and then to register for the IPAFFS system. We have [a guide and a video](#) showing how to register for IPAFFS and we are running webinars on how to submit a notification – see gov.uk for dates and recordings.

Can we try out IPAFFS?

There is a link to a training environment on our [microsite](#). Note that you will need to register for a Government Gateway account to access the training environment.

Is there a time limit for uploading the EHC into IPAFFS?

The importer will need to upload the Export Health Certificate to IPAFFS prior to the consignment's arrival in Great Britain, and no later than the required pre-notification time. Note that this will not need to be done until EHCs are required, from 1 July 2022.

Is it just the EHC that needs to be uploaded or also accompanying documentation?

You must upload a copy of the EHC, but there are no restrictions against also uploading accompanying documentation.

What happens if the IPAFFS administrator leaves the company?

We recommend that more than one person is set as the administrator for the company, but if you do find you have no one assigned, please contact the Animal and Plant Health Agency at imports@apha.gov.uk to resolve the issue.



Will there be a CSV capability for bulk upload in IPAFFS?

Currently, there is no CSV capacity bulk upload for products of animal origin. We are exploring delivering advanced capabilities in the future.

Can you notify more than 24 hours in advance?

Yes. There's no limit on how far in advance you can raise a notification, only a minimum required time.

Can goods go through any port between 1 January and 1 July, not just those specified for a particular type of product only?

Yes: until 30 June 2021, you can continue to arrive at any point of entry. From 1 July 2022 you must bring those goods in via an established point of entry with an appropriately designated Border Control Post.

Do we need to pre-notify if we have a specific import licence (e.g., under IAPO or SAPO)?

Yes. All imports of ABP products must be pre-notified on IPAFFS.

Does 'country of origin' mean the country you are sending from or the country where the product is produced? What if my product includes ingredients from several countries?

For animal products the country of origin means where the animals originate, or where goods were produced, manufactured and packaged (labelled with the identification mark).

We deliver to GB customers from ROI on a DDP basis and our UK entity (which has an EORI number, etc) acts as the 'Importer of Record'. Can we use the UK entity to complete the IPAFFS entry on behalf of our customers?

In some cases, the importer may use an agent to complete the requirements on behalf of the importer, who will provide the relevant documentation and notifications. The terms of responsibility will be established between the agent and the importer; therefore, it can be the actual importer or the agent that completes IPAFFS.

If the truck and trailer registration numbers are not known when the EHC is completed for IPAFFS pre-notification, can they be added manually to the certificate when the goods are collected?

No, all the requirements must be met for the EHC to be issued. In a scenario where the truck changes en route, you will be able to contact the port health authority and update the IPAFFS pre-notification rather than issue a new certificate.



When raising an entry in IPAFFS, does the registration number that IPAFFS will provide need to go on the EHC?

There is no need to attach the registration number on the EHC unless it is an item that has a specific requirement for a unique notification number and that only applies to the import of live animals and products of animal origin under safeguard measures.

How far in advance do we pre-notify on IPAFFS and when is the latest we can do this?

Pre-notification time is set in legislation, which requires pre-notification to be made at least 24 hours prior to arrival at the port of entry. However, the legislation allows for a derogation, reducing the notification time to no less than four hours prior to arrival, where logistical constraints prevent earlier pre-notification. This derogation can be applied by the competent authority at the Border Control Post (BCP).

From 1 January 2022 businesses will be able to take advantage of the derogation and notify no less than four hours in advance of arrival at the point of entry, without any need to contact the relevant competent authority.

This is a temporary arrangement. From 1 July 2022, importers will be required to contact the competent authority at the point of entry to determine if, and by what degree, a derogation from 24 hours can be applied.

Anyone taking advantage of the derogation between 1 January and 30 June will need to consider that they may not be able to do so from 1 July 2022.

Does the derogation apply to goods from destinations other than the EU?

The derogation applies only to EU to GB imports of POAO, ABP and HRFNAO subject to SPS border controls from 1 January 2022.

This temporary derogation does not apply to rest of world goods transiting the EU which are not cleared for circulation on the EU market where the final destination is Great Britain.

There is no change to existing controls introduced on 1 January 2021, or to controls in place for third countries not subject to the phased introduction of import controls.

The importer (or a representative acting on their behalf) is responsible for ensuring that the pre-notification is raised in time and other requirements (such as provision of an EHC) are met. Once the product has been imported into Great Britain, the importer is liable for the consignment.



ABP categories

I don't know if my product is an ABP – where can I find this information?

If the animal product is not for human consumption, it would be classified as an ABP. To find more detail on each category please visit [here](#).

Is there a list of what ABPs GB considers high risk?

High risk ABPs are those in either Category 1 or Category 2. To find the products listed in each category please visit [here](#).

Is pet food ABP or POAO?

Any product that comes from an animal and that is for human consumption is POAO. Any product from an animal not for human consumption is an ABP – so pet food is an animal by-product.

Are fish meals and fish oils considered as ABP?

It depends on the final use. Fish meal is not for human consumption, so is classified as an ABP. Fish oils, in capsules for human consumption, are classed as products of animal origin (POAO).

If I need to import finished pet food from EU, would it be considered as ABP?

Yes. When a pet food is finished – and can be placed on a supermarket shelf – it has reached an end point from the perspective of ABP controls. However, it would still need an EHC and fall under the ABP regulations in terms of import documentations.

For IVD reagents containing ABP (e.g., bovine serum albumin), are finished CE marked kits in scope? Does the treatment of the material e.g., lyophilisation determine whether products are in scope? Are products from cell cultures classed as ABP, e.g., enzymes, antibodies, antigens and other biologics?

Yes, they would be in scope and would need to have the required licensing and documentation to be imported into GB.



Export Health Certificates

What is an Export Health Certificate?

An EHC is a document that confirms that certain information, health standards and regulations have been met so ABPs can be imported into Great Britain (GB).

EHCs need to be completed by the exporting country and signed by a certifying officer (usually an official veterinarian) or competent certifier, recognised by the exporting country as having the correct qualifications to certify the product in question.

At present, most ABPs do not need an EHC until 1 July 2022.

Why do I need an EHC?

An EHC ensures that our high biosecurity and food safety standards are met.

A completed EHC is needed for each consignment of ABPs imported to GB. If a GB trader imports a consignment which includes a mix of products, they'll need to make sure the exporter arranges an EHC for each product type.

Who is responsible for arranging EHCs?

For products coming in from the European Union (EU) into Great Britain the exporter in the EU country will obtain the EHC, which will be issued by the relevant competent authority in the EU Member State.

Where will I get an EHC?

Export Health Certificates are issued by the competent authority in the exporting country, based on the requirements outlined in the model health certificates on gov.uk. The EHC is issued to the exporter based in the European Union (EU), who then provides the importer with an electronic copy to upload onto the notification in IPAFFS before the consignment arrives into Great Britain. It is the responsibility of the GB importer (or a representative acting on their behalf) to pre-notify authorities using IPAFFS.

For commodity-specific advice, please refer to the Import Information Notes (INN) on the Animal and Plant Health Agency's (APHA) Vet Gateway.

What should I do if an export health certificate is not available for my ABP commodity?

The scope of the certificate is outlined on the health certificate. If the ABP commodity does not have a harmonised GB health certificate, the importer should check if there is a general licence here. If there is no general licence, the importer should complete the IV58 form at GOV.UK and send this to imports@apha.gov.uk.



As part of the application, you will need to include the:

- Ingredient list, including percentage breakdown
- Origin of the ABP content and final product
- Flow diagram of the process to develop the final product (including heat treatment/processing applied to ABP)

For more information about what you need to do to prepare and the phased change for animal and animal product imports EU-GB please visit [here](#).

Can an EHC cover multiple products?

The facility to group various product lines onto a single EHC is decided by the specific conditions of the relevant EHC. For example, multiple commodity codes can be added to one EHC, as far as the definition of the products falls within the scope of the certificate. This can be found in the guidance notes and only if each meets the same attestations on the certificate.

For example, it may be possible to consolidate a number of batches of product into a single consignment, which a single EHC would cover. This could cover, for example, multiple product lines of the same commodity type (e.g., composite products) from the same supplier.

What is the process for arranging an EHC?

1. The exporter contacts the competent authority to arrange for a certifying officer to inspect the goods to be imported to GB.
2. The certifying officer(s) reviews the consignment and, if it meets the required conditions, issues the EHC.
3. The EU exporter obtains the EHC from the competent authority and sends an electronic copy to the GB importer.
4. The importer uploads an electronic copy of the EHC on IPAFFS.
5. The original certified EHC travels with the consignment.

Is an EHC required for each consignment or would it be possible to have an EHC covering an annual validity period for several consignments?

You must obtain an EHC for each consignment. An EHC can only be used once, for its group of products.



Will Export Health Certificates require other documentation?

Any official SPS documents that are required to accompany the EHC, such as any additional attestations or lab results, will be specified on the appropriate EHC.

Other documentation may be required depending on the commodity, such as a catch certificate for marine-caught fish, or for customs purposes.

Is there guidance on EU-GB import EHCs on gov.uk?

We publish guidance on completing the export health certificate and commodity-specific information is available on APHA's Vet Gateway. However, detailed Notes for Guidance (NFGs) are produced by the exporting country. Please contact the competent authority in the exporting country to find out more.

Can I see an example of an Export Health Certificate?

Yes. You can find [model Export Health Certificates](#) on gov.uk alongside other related templates and information. Note that these model certificates are for your information only – they are not valid for download and manual completion.

Does the Export Health Certificate require the vehicle registration number?

All fields on the EHC must be completed, be accurate at the time it is issued, and all mandatory fields must be completed, including the vehicle registration number.

However, in line with Annexe II of 2019/628 the certifying officer should record the intended means of transport in I.15 based on information provided by the exporter. If the vehicle registration number changes, the person responsible for the load must inform the Border Control Post (BCP) of the new registration number.

If the trailer and truck numbers must be on the EHC, suppliers may not have this in advance (until the lorry turns up) – so can this be added manually to the EHC?

The UK has implemented the same system at the EU currently has for imports from third countries, and as part of that system, the certifying officer is required to verify the means of transport and its identity, which in many cases is the vehicle registration and the trailer number.

If the truck that leaves the premises where the goods are certified is not going to be the means of transport into GB, the first vehicle's details will have to be entered on the certificate and then the representative or the haulier moving the goods should inform the BCP in writing that the details have changed for the vehicle. This is one of a limited number of situations in which information may be presented to the BCP that is different to what is on the EHC without the certificate needing to be reissued or replaced.



Does the EHC need to be completed in English? Are EHCs available in local languages?

The EHC will need to be completed in English to allow for documentary checks to take place. It is the responsibility of the Competent Authority of the exporting country to organise translations of the EHCs to support the certification process.

What happens if the original signed EHC is lost or destroyed in transit?

The original EHC needs to accompany the consignment to the BCP/destination. If the EHC is lost or destroyed in transit, it could result in potential rejection of the consignment.

What happens if there is a discrepancy with the quantity loaded onto the vehicle?

All the details and relevant information for the consignment will need to be reflected on the EHC. The Certifying Officer (CO) will check the details are correct at the point of certification.

Can a certifying officer in an EU Member State exporting country certify EHCs remotely?

ABP imports to GB must meet all the requirements set out in our model EHCs and it is up to Member States to comply with these requirements. There is no legislative requirement for certification to take place in person, providing the certifying officer is still able to determine the consignment meets GB import requirements.

What are documentary, identity and physical checks?

A documentary check is an examination of official certifications, attestations and other commercial documents that are required to accompany a consignment.

An identity check entails the visual inspection of a consignment to verify that its content and labelling corresponds to the information provided in accompanying documentation.

A physical check entails a check on the goods to verify that they are compliant with the sanitary and phytosanitary import requirements for GB. This includes, as appropriate, checks on the consignment's packaging, means of transport and labelling, temperature sampling, laboratory testing or diagnosis as required.

ABP consignments will be physically checked by opening the container, boxes, and checking the product to ensure no evidence of contamination, mould, or bacterial overgrowth, etc. Goods subject to physical checks will not always be sampled for lab testing. This is performed on a random basis, or if non-compliance is suspected, or the goods are subject to compulsory lab testing due to a history of non-compliance.

Can the EHC be printed and signed by hand?

Export Health Certificates are issued to the exporter by the relevant competent authority in the EU Member State. The certificate will need to be signed by the certifying officer.



What checks are carried out on ABP?

From 1 January 2022, the importer is required to pre-notify the ABP consignments via IPAFFS

From July 2022, ABP will also be subject to documentary, identity and physical checks on a risk basis and the consignment must enter via a point of entry with a BCP that is designated to receive those particular goods.

Do fish oils need special certificates, such as catch certificates, as they are a fish product?

Our EU IUU regulation applies to anything covered under tariff code 03 or 1604/1605. Fish oil comes under 1604 and is therefore not covered. IUU applies to marine caught fish. Fish oils do not require catch certifications. but will require a standard EHC.

What is the correct EHC for fish meal used for fishing bait?

If you are importing the raw ingredients, then you can use the EHC that is relevant for processed animal proteins. Products such as fishing baits are known as 'non-harmonised commodities' and in these cases we would agree a specific certificate for the import of a particular product from a particular country. You would need to contact the [Animal and Plant Health Agency](#) (APHA), to agree on what those conditions are, which would be applied on a case-by-case basis.

Are antibodies for research included as ABP?

Generally speaking, yes. A lot of antibodies are held in a carrier and are included in the regulations for ABP, whether it is being imported for trade or research purposes.

Port Health Authorities and Border Control Posts

What will the rules be for goods exported from the EU but rejected at the GB border?

The UK has implemented import controls in a phased approach which will mean EU SPS goods will not be subject to BCP checks on entry until 1 July 2022. Therefore, if the goods are returned to the EU during this period, it would be dependent on the EU Member State if they will accept this return and if EU legislation permits this.

From 1 July 2022, EU SPS goods rejected at an UK BCP may be re-exported to the EU if the consignment is not rejected due to a serious animal or public health concern. If the consignment is re-exported to the EU, the UK BCP will provide the relevant documentation, where necessary, to the re-entry BCP in the EU. For example, this may include a letter stating the reason for rejection and confirmation that the goods have been under customs or competent authority supervision.