



Guidance on changes to the rules for movement of Composite Products from GB to NI from 21st April 2021

What is a composite product?

Composite products are foodstuffs containing both products of plant origin and processed products of animal origin.

In accordance with [Regulation \(EC\) No 853/2004](#), the composite products must be manufactured with processed products of animal origin produced in EU-approved establishments located either in EU Member States or in third countries authorised for the entry into the European Union of those processed products of animal origin.

Summary of the changes and when they will apply?

The rules for movement of composite products from GB to NI will change with the introduction of new EU Animal Health Regulations (AHR) on the 21st April 2021.

The new rules introduce new Export Health Certificates (EHC) for some composite products and for other composite products, exempt from EHCs, new documentation will now be required.

Not all changes take immediate effect on 21 April as there are transition arrangements in place. However for other composite products the new rules will apply from 21 April without transition. More information is available [here](#) and within this guide.

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Authorised Traders and Movement of Composite Products.

Businesses on the Authorised Trader list that are moving composite products from GB to NI will not be required to complete new composite EHCs or private attestations until the relevant phase of compliance comes into effect post 01 Oct 2021. In the meantime, STAMNI (Scheme for Temporary Agri-food Movements to Northern Ireland) declarations will meet the requirements for movement of composites.

However, all such goods moved from GB to NI by Authorised Traders must comply with the regulatory requirements for production of composite products.

Details of the changes to the categorisation of composite products and associated requirements

From 21/04/2021 composite products will be categorised as follows:

- Non shelf-stable composite products.
- Shelf-stable composite products that contain any quantity of meat products, except gelatine, collagen and highly refined products.
- Shelf-stable composite products that do not contain meat products, except gelatine, collagen and highly refined products.

The categorisation process is described in the following composite decision tree:

[ia_ic_composite-prods_decision-tree.pdf \(europa.eu\)](#). The documentary requirements for each category are outlined in detail below:

Non Shelf-Stable Composite Products

All non-shelf stable composite products will now require an EHC to be moved to NI from GB.

Traders can choose to use the existing composite product EHC until August 2021 if the product currently requires an EHC. After then the new EHC must be used.

If the product doesn't currently require an EHC but will now need one under AHR, traders must use the new EHC available [here](#).

You must also pre-notify the arrival of your consignment to a NI Point of Entry (POE) by completing a Common Health Entry Document (CHED) on **TRACES NT** and uploading the EHC. You can find advice and guidance on how to do this [here](#).

Shelf-Stable composite products that contain any quantity of meat products, except gelatine, collagen and highly refined products

Those shelf-stable composite products that contain any quantity of meat products (except gelatine, collagen and highly refined products) will continue to need to be accompanied by an EHC. A new EHC will be available from 21 April but as with non-shelf stable composite products traders can continue to use the existing EHC until August 2021 after which time the new EHC must be used.

Pre-notification as outlined above will also be required.

Shelf-stable composite products that do not contain meat products, except gelatine, collagen and highly refined products

Shelf-stable products not containing meat (except gelatine, collagen and highly refined products) will require a new private attestation to accompany the composite product, available [here](#).

This will replace the EHC that had previously been required for those shelf stable composite products containing **more** than 50% processed products of animal origin. Traders can continue to use the existing EHC for such products until August 2021. From August 2021 the new attestation will be required.

For those shelf stable composite products that contain **less** than 50% processed products of animal origin the new private attestation will be required from 21 April.

With regard to the pre-notification requirements for this category of composite products the following applies:

- If the shelf-stable product is not listed as low risk (see below) in accordance with Article 48 (h) of Regulation (EU) 2017/625, it will require pre-notification on **TRACES NT** by creating a CHED P and uploading the private attestation. These products will be subject to controls at the NI Point of Entry (POE). You can find advice and guidance on how to do this [here](#).
- For those low risk shelf stable composites pre-notification on **TRACES NT** is not required however, the private attestation must be sent to: CompositeProducts@daera-ni.gov.uk in advance of arrival. The importer name, date of arrival and trailer number must be included in title of email. These consignments will be subject to risk-based controls at point of destination instead of at the NI POE.

Low risk shelf-stable products

| CN codes (1) | Explanations (2) |
|---|---|
| 1704, ex 1806 20, ex 1806 31 00, ex 1806 32, ex 1806 90 11, ex 1806 90 19, ex 1806 90 31, ex 1806 90 39, ex 1806 90 50, ex 1806 90 90 | Confectionery (including sweets), chocolate and other food preparations containing cocoa that meet the requirements of Article 3(1). |
| ex 1902 19, ex 1902 30, ex 1902 40 | Pasta, noodles and couscous that meet the requirements of Article 3(1). |
| ex 1905 10, ex 1905 20, ex 1905 31, ex 1905 32, ex 1905 40, ex 1905 90 | Bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products that meet the requirements of Article 3(1). |
| ex 2001 90 65, ex 2005 70 00, ex 1604 | Olives stuffed with fish that meet the requirements of Article 3(1). |

| CN codes | Explanations |
|------------|--|
| (1) | (2) |
| 2101 | Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or mate thereof that meet the requirements of Article 3(1). Roasted chicory and other roasted coffee substitutes, and extracts, essences and concentrates thereof that meet the requirements of Article 3(1). |
| ex 2104 | Soup stocks and flavourings packaged for the final consumer that meet the requirements of Article 3(1). |
| ex 2106 | Food supplements packaged for the final consumer, containing processed animal products (including glucosamine, chondroitin or chitosan) that meet the requirements of Article 3(1). |
| ex 2208 70 | Liqueurs and cordials that meet the requirements of Article 3(1). |

Further details on the transition arrangements

In order to smooth the transition, [Article 35 of Commission Implementing Regulation \(EU\) No 2020/2235](#) introduces a period of six months for the imports of composite products during which the old certificate will be accepted to enter the Union.

Where no certificate was required prior to 21 April 2021, then the new relevant certificate or private attestation must be provided from 21 April 2021.

Traders should familiarise themselves with the further information on the import of composites found at: [ia_ic_composite-prods_qandas.pdf \(europa.eu\)](#).

Details of other requirements for composite products containing fish.

Some composite products that contain wild caught fish may also be required to obtain the appropriate Illegal, Unreported and Unregulated (IUU) catch certificates. The relevant CN codes are those that fall under [Chapter 3 and the Tariff headings 1604 and 1605](#).

If the product contains wild caught fish making up more than 20% by weight of its total ingredients, you will need to obtain the appropriate catch certificate.

Farmed aquaculture does not require a catch certificate, even if it falls under the same Tariff Headings highlighted above. Furthermore, other products containing or obtained from fishery products, not classified in Chapter 3 or in Tariff headings 1604 and 1605, are also excluded, for example, products classified in Chapter 15 (fish fats and oil etc).

Further information on catch certificate requirements can be found on the DAERA fisheries webpages [here](#).

Specific guidance for composite products containing High Risk Food Not of Animal Origin (HRFNAO)

In addition to the composite requirements, you also need to consider whether the ingredients in the foods you are moving are a [high risk food not of animal origin](#) compound product. In some cases a product could be both a composite and a compound product and in such circumstances additional requirements may apply.

Compound products are those where the high-risk ingredients are listed in [Annex II](#) and are in excess of 20% of the final product. Compound foods include confectionery, chocolate, bread, pastries, cakes and biscuits. Compound foods require pre-notification on **TRACES NT** using a CHED-D in addition to the documents required under the relevant composite product rules.

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