



MARKET ACCESS ADVICE

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European Union (EU) Composite Products

Attention	Industries	Various Industries and Exporters
	DAFF	Central and Regional Offices
Affected Markets	European Union, EU dependencies and countries that adopt EU import regulations (such as Croatia, Macedonia, Albania, Norway, Switzerland, and Iceland)	
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This market access advice updates the market access advice about composite foods intended for export to the European Union (EU) dated 24 September 2012 which is available online under links for market access advice such as www.daff.gov.au/aqis/export/dairy/din/2012/maa-2012-01. The Department of Agriculture, Fisheries and Forestry (DAFF) has developed an English only template that complies with the EU’s composite food regulation, the M492, which is available as a manual certificate. This certificate must be used for composite foods that contain more than 50% processed animal origin products. As previously outlined, composite foods are foods that contain a mixture of plant origin and processed animal origin products (such as products made from meat, dairy, fish, egg, gelatine and honey).

Since the EU composite food regulation was published, the United Kingdom (UK) Department of Environment, Food, and Rural Affairs developed several flowcharts and frequently asked questions (FAQ) to clarify the requirements for composite foods (www.defra.gov.uk/animal-trade/imports-non-eu/iins/animal-products-hc/iin-cp-1/). These flowcharts and FAQ have been modified by DAFF to reflect Australian exports. Annex 1 and 2 of this market access advice includes the modified flowcharts and FAQ.

While these flowcharts and FAQs are useful guides, it is important for exporters to check requirements with their importers prior to export if they intend to export composite foods to countries, other than the UK, that adopt EU requirements. This recommendation reflects DAFF understanding that some border posts may interpret the requirements differently. For example, it has recently come to the attention of DAFF that the Netherlands requirements for a composite food with dairy and fish ingredients differs from the instructions on this certificate and the DEFRA flowcharts in that they expect that if the processed animal origin ingredients make up half or more of a composite food, that sections in the M492 for each ingredient must be completed. It does not matter how much of these ingredients is in the food.

The information provided above is current at the time of writing and is intended for use as guidance only and should not be taken as definitive or exhaustive. The Commonwealth endeavours to keep information current and accurate, however, it may be subject to change without notice. Exporters are encouraged to verify these details with their importers prior to undertaking production/exports. The Commonwealth will not accept liability for any loss resulting from reliance on information contained in this notice.

ANNEX 1: MODIFIED DEFRA FLOWCHARTS

(Adapted from www.defra.gov.uk/animal-trade/files/comp-prod-flowchart.pdf)

FLOW CHART 1: UK requirements for composite foods containing meat

COMPOSITE FOOD CONTAINING MEAT
(Note: It does not matter how much meat is in the food)

REQUIREMENTS

- The meat ingredients must be EU eligible, and processed in an EU approved establishment in either:
 - Australia;
 - an EU country; or
 - another country with a similar health status to Australia.
- If the food contains emu or ostrich meat products, these meat products must have been heat treated to a minimum temperature of 70 °C which must be reached throughout their substance.

VETERINARY CHECKS ON ARRIVAL IN THE UK

- Yes

DOCUMENTATION REQUIRED

- M492 certificate with the meat section completed (section II.2.A).

FLOW CHART 2: UK requirements for composite foods containing dairy

Less than half the weight of the food is dairy?

COMPOSITE FOOD CONTAINING DAIRY

Half or more of the food is dairy?

- Does the composite food meet all of the following requirements?
- shelf-stable at ambient temperature or have clearly undergone in their manufacture a complete heat treatment process throughout their substance so that any raw product is denatured;
 - clearly identified as intended for human consumption;
 - securely packaged or sealed in clean containers;
 - accompanied by a commercial document and labelled in an official EU language, so that that 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.

Yes

No

REQUIREMENTS

The dairy ingredients must have been sourced from a country that is authorised by the EU to export dairy products and heat treated (if required for imports from that country). The ingredients do NOT need to be EU eligible. Note: Dairy products of Australian origin do not need to be heat treated.

VETERINARY CHECKS ON ARRIVAL IN THE UK

- No

DOCUMENTATION REQUIRED

- Commercial documentation (must state country of origin and heat treatment of the dairy ingredients in addition to requirements in box above).

REQUIREMENTS

- The dairy ingredients must be EU eligible and processed in an EU approved establishment in either:
 - Australia;
 - an EU country; or
 - another country with a similar health status to Australia.

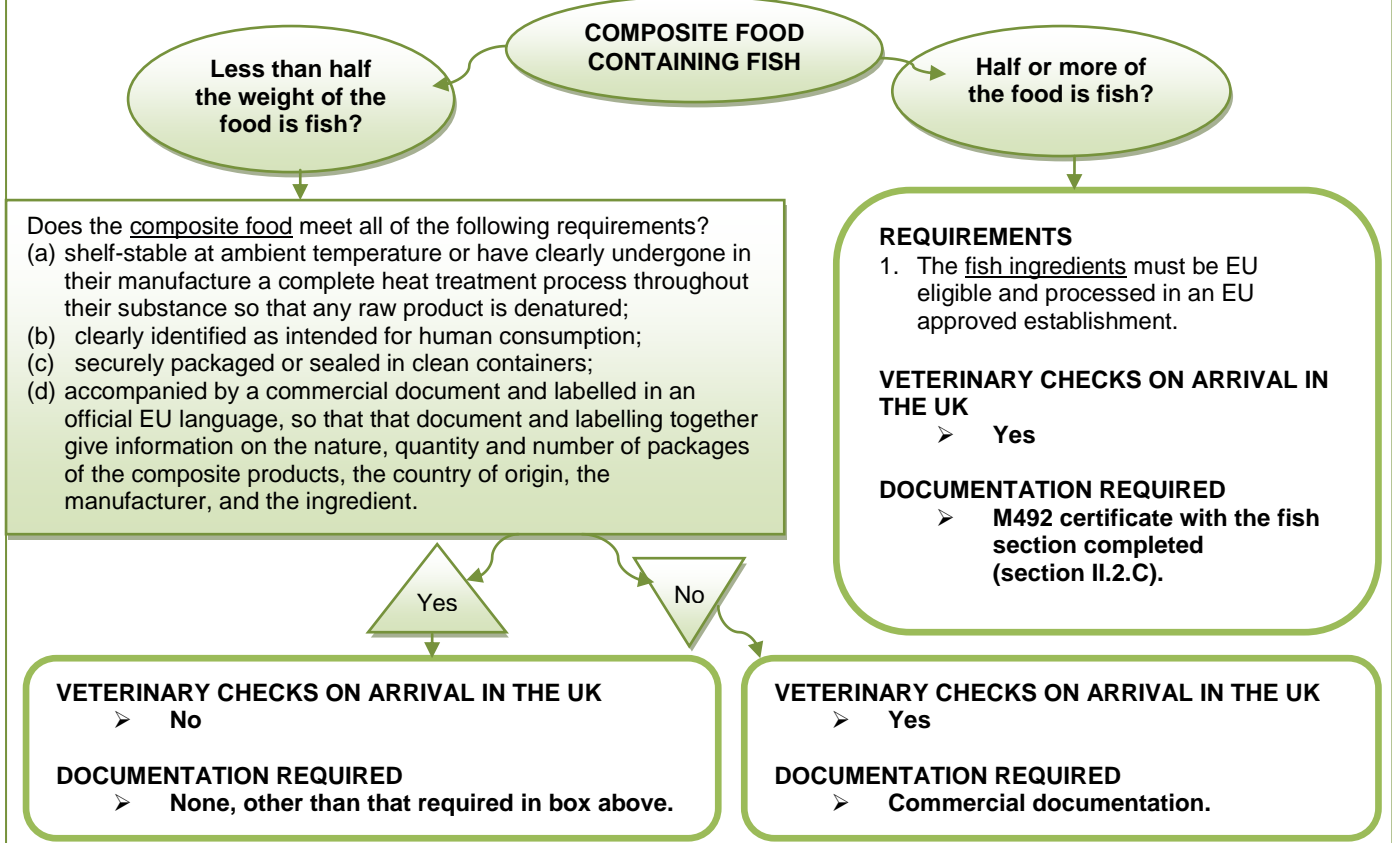
VETERINARY CHECKS ON ARRIVAL IN THE UK

- Yes

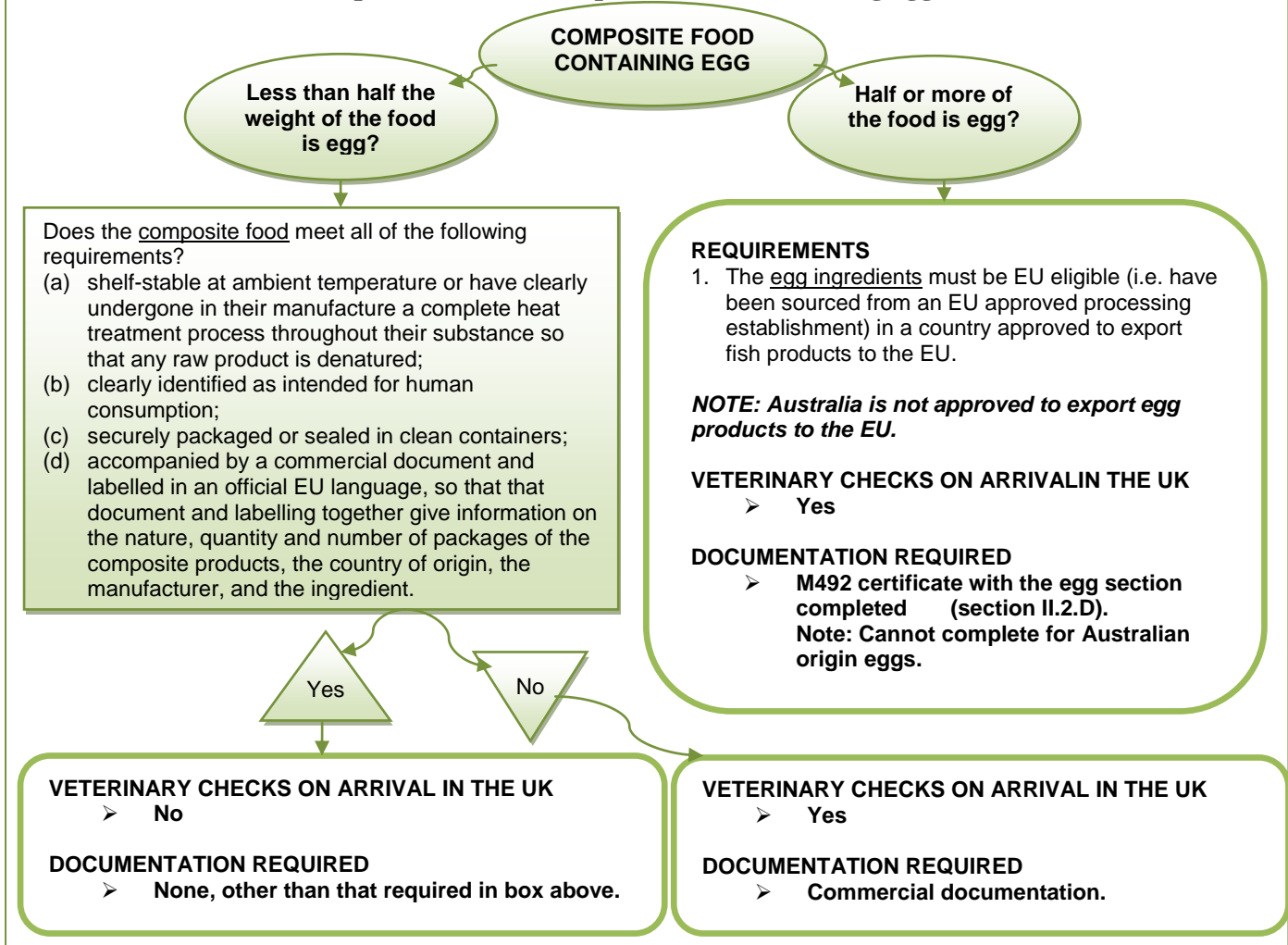
DOCUMENTATION REQUIRED

- M492 certificate with the dairy section completed (section II.2.B).

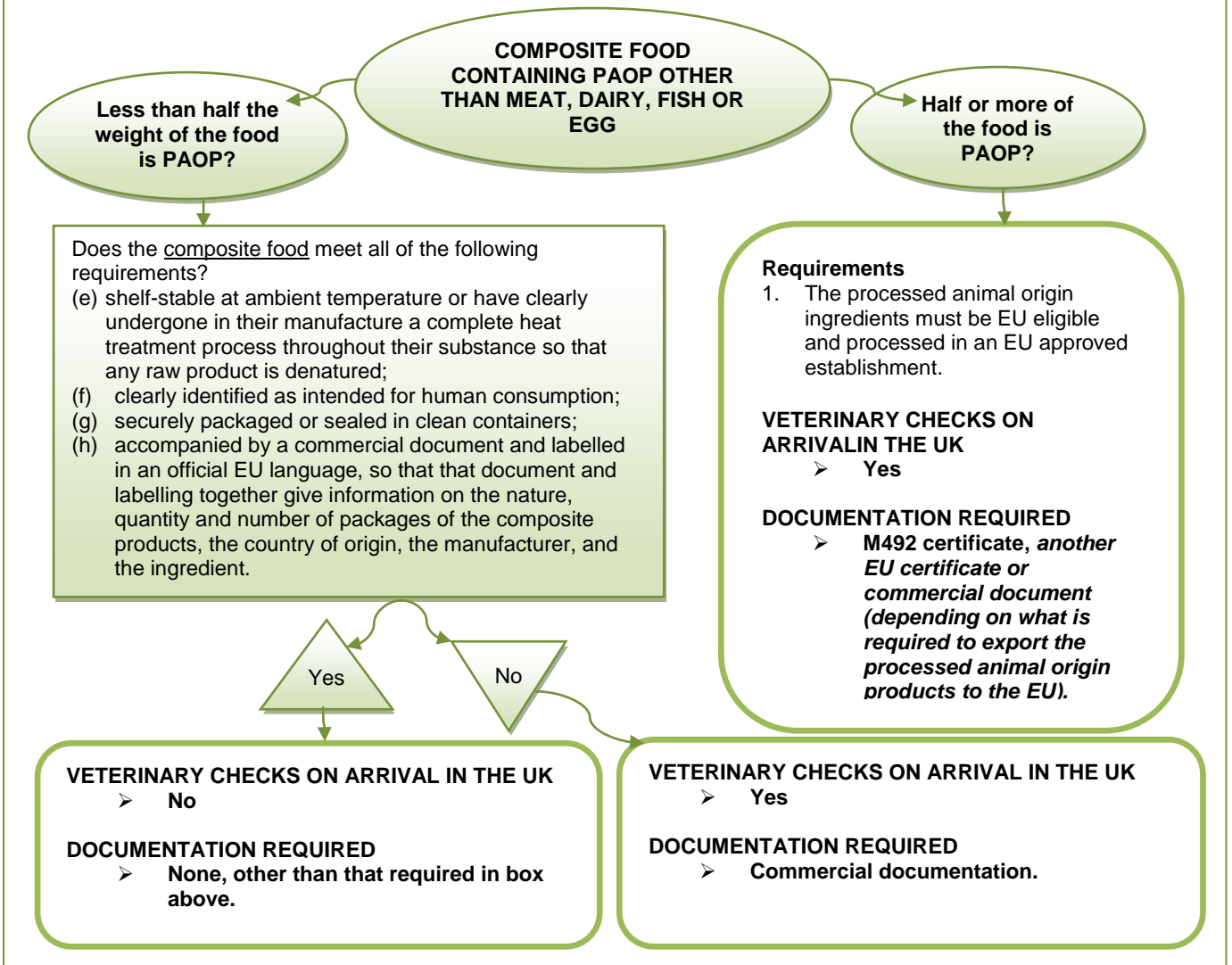
FLOW CHART 3: UK requirements for composite foods containing fish



FLOW CHART 4: UK requirements for composite foods containing egg



FLOW CHART 5: UK requirements for composite foods containing processed animal origin products (POAP) other than meat, dairy, fish and egg (such as honey or gelatine)



ANNEX 2: MODIFIED FAQ ABOUT THE IMPORT OF COMPOSITE FOODS INTO THE UK (Adapted from www.defra.gov.uk/animal-trade/files/comp-products-qanda.pdf)

1. What should I do if there is more than one processed product of animal origin in the composite food?

If the processed animal origin ingredients collectively make up more than half of the food, the food will be subject to veterinary checks on arrival and must be accompanied by the M492 certificate. If the processed animal origin ingredients add up to less than half of the food, a M942 certificate may still be required. Refer to all the flowcharts in Annex 1 and the instructions on this certificate.

2. What products are exempt from the composite product requirements because they are listed in Annex II of Commission Decision 2007/275/EC?

- Biscuits, bread, cakes;
- Chocolate and confectionery (including sweets);
- Unfilled gelatine capsules;
- Food supplements packaged for the final consumer, containing small amounts of animal product, and those including glucosamine, chondroitin, or chitosan;
- Meat extracts and meat concentrates;
- Olives stuffed with fish;
- Pasta and noodles not mixed or filled with meat products; and
- Soup stocks and flavourings packaged for the final consumer, containing meat extracts, meat concentrates, animal fats, or fish oils, powders or extracts.

3. Are there any exceptions to the list of products in Annex II of Decision 2007/275/EC that need to be veterinary checked on arrival in the UK (and may need certification)?

The list of products in Annex II of Decision 2007/275/EC includes biscuits, bread and cakes. These products should be of a basic nature and have been fully baked. Any toppings or fillings must not contain meat, and must be shelf-stable at ambient temperatures. Thus cakes with fresh cream or whole egg or speciality bread with meat or visible cheese layers are not exempted. If cakes are decorated with a non-dairy type topping, importers must ensure that the consignment is accompanied by appropriate documentation to confirm that the cake toppings do not contain dairy ingredients. The types of confectionery products that are listed in Annex II of Decision 2007/275/EC include retail-packaged individually-portioned ambient-stable desserts and sweets containing processed milk, egg and gelatine. Sweets that are made with high levels of unprocessed milk products are considered to be dairy products.

4. Is tinned tuna with oil a fish product or a composite product?

A fish product.

5. Is tinned tuna with salad a composite product?

Yes. And if the tuna constitutes half or more of the product, it will need to be veterinary checked and be accompanied by the M942 certificate.

6. Is pizza a composite product? What conditions apply?

Yes, if it contains processed POAP, it will need to be veterinary checked and be accompanied by the M492 certificate. This includes vegetarian pizzas (e.g. no meat or fish) which only contain cheese.

7. What about ice-cream made with powdered milk where the milk has already been processed/heat treated before being used to manufacture the ice-cream?

The ice-cream is not shelf stable at ambient temperature. It will therefore have to be veterinary checked and accompanied by the M492 certificate with the dairy section completed (section

II.2.B). The milk product will have to come from an EU approved establishment in an EU approved country.

8. Is a meat and pasta bake containing raw/unprocessed meat a composite product?

No. Composite products are those containing processed products of animal origin. This is a meat preparation and needs to meet the relevant EU requirements of meat preparations (i.e. be processed at an establishment that approved to process meat preparations for export to the EU and be accompanied by the M377A (the meat preparations certificate for exports to the UK).

9. What about dried rice pot with a sachet containing meat or dairy ingredients?

The sachet is treated as a product in its own right regardless of the content of the rice pot. If the sachet contains pieces of meat, it must be treated as a meat product. This would mean that the meat products must meet the relevant requirements of EU meat products (i.e. be processed at an establishment that approved to process meat products for export to the EU and be accompanied by the Z695 (the meat products certificate for the UK). If the sachet just contains meat extract, the product it would be covered by Annex II of Decision 2007/275/EC and is exempt from veterinary checks. If the dairy ingredients in the sachet are half or more of the content, the product would be subject to veterinary checks, and the milk product would have come from either an EU country or an approved country.

10. What about gelatine capsules containing fish oil?

These are regarded by DEFRA as a fish product and are subject to veterinary checks. They need to be accompanied by an EU fish product certificate.

11. What is the definition of a meat concentrate?

It is an extract derived from meat.

12. If a composite product contains processed meat and dairy ingredients and no other POAO should the references to fish and egg in the certificate be deleted?

Yes. Further, if the composite product contains less than half its substance of dairy ingredients and is shelf stable at ambient temperature, the milk products part of the M492 certificate does not need to be completed (section II.2.B).

13. What conditions would apply for a cooked Scotch egg?

It would be a composite product subject to veterinary checks. It would have to be accompanied by the M492 certificate with the meat (Section II.2.A) and egg (Section II.2.D) parts certified.

14. What about a product containing cooked meat and vegetable e.g. a meat and potato pie?

This is a composite product and DEFRA would expect it to be accompanied by the M492 certificate.

15. What about a sandwich containing processed POAO and uncooked vegetable, e.g. tuna and sweet corn sandwich spread which contains 60% tuna and uncooked sweet corn?

The sandwich is a composite product containing cooked fish. It does not matter that the sweet corn is not cooked, because a composite product consists of processed animal origin products but other ingredients do not have to be processed. It will have to come in with the M492 certificate.

16. What is the difference between a meat product and a composite product with meat?

Manufacture of the product is all part of the same process for meat products. Composite products involve the addition of other foodstuffs to processed meat products. For example, a cottage pie is a composite product, as the meat is cooked first and then the meat product is created. The potato is then added before putting in the oven to finish off the cooking process.