



MARKET ACCESS ADVICE

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European Union – Composite products

Attention	Industries	Export Establishments Industry bodies – Seafood Industry Licensed exporters
	Department of Agriculture	Central and Regional Offices Fish Inspectors
Affected Markets	European Union	
Further Information	Email: exports@agriculture.gov.au	

The Department of Agriculture (the department) recently received the European Commission Food and Veterinary Office's (FVO) final report following the 2014 audit of Australia's controls over the production of red meat (meat products, minced meat, meat preparations and casings) and wild boar meat. The report indicates that Australia is required to review our certification requirements for composite products in order to meet European Union (EU) requirements.

EU-listed establishments are reminded that the EU defines composite products as foodstuffs intended for human consumption that contains both processed products of animal origin **AND** products of plant origin. Composite products are foodstuffs where the processing of primary product is an integral part of the production of the final product.

[Commission Regulation \(EU\) No 20/2012](#) divides composite products into the following categories:

1. products containing any amount of processed meat products (even if less than 5 per cent)
2. products containing 50 per cent or more dairy; or less than 50 per cent dairy and which are not shelf-stable at room temperature
3. products containing 50 per cent or more of either fish or egg products.

Common types of composite products include (but are not limited to): meat pies, sausage rolls, ice-cream, pastries and patisseries, seafood extender. Attachment 1 provides a checklist for exporters to determine whether products are considered to be composite products for the EU.

The department is currently reviewing certification processes for composite products, and will provide exporters with further information in due course. Exporters are encouraged to contact their Department of Agriculture regional office for further information and/or assistance when exporting these products.

Industry was consulted in the preparation of this Market Access Advice.

Checklist for determining composite products

Question	Yes	No
<p>1. Does the foodstuff contain processed foods of:</p> <ul style="list-style-type: none"> i. Animal origin (e.g. meat, dairy, fish, egg); AND ii. Plant origin (e.g. grains, seeds, vegetables, fruit) <p><i>If the foodstuff contains processed foods of either animal origin or plant origin (but not both), tick 'no' and skip to 'Test' section at the end of this table</i></p>		
<p>2. Does the foodstuff contain any processed meat products (even if it is less than 5%)?</p> <p><i>"Processed meat product" is defined as processed products resulting from the processing of edible parts (including blood) of cattle, sheep or game species, or from the processing of such processed products, so that the cut surface shows that the product no longer has the characteristics of fresh meat.</i></p>		
<p>3. Does the foodstuff contain 50% or more of processed dairy products?</p> <p><i>"Processed dairy products" is defined as processed products resulting from the processing of raw milk or from the further processing of such processed products.</i></p>		
<p>4. Does the foodstuff contain less than 50% dairy products, and require active refrigeration or temperature control (i.e. not shelf-stable)?</p>		
<p>5. Does the foodstuff contain 50% or more of egg products?</p> <p><i>"Processed egg products" is defined as processed products resulting from the processing of eggs, or of various components of mixtures of eggs, or from the further processing of such processed products.</i></p>		
<p>6. Does the foodstuff contain 50% of more of processed fishery products?</p> <p><i>"Processed fishery products" is defined as processed products resulting from the processing of fishery products or from the further processing of such processed products.</i></p>		
<p>TEST: If you answered "yes" to any of the above questions, then the foodstuff is considered to be a composite product and will need to comply with EU requirements for composite products.</p>		

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.