

BIP UPDATE TRAINING 27TH NOVEMBER 2019



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IMPORTS OF ANIMAL BY- PRODUCTS AND DERIVED PRODUCTS NOT INTENDED FOR HUMAN CONSUMPTION

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WHAT IS ABP?



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- ABP is used to define “animal by-products and derived products not intended for human consumption”.
- Amended Regulations on imports of Animal By-Products not for human consumption came into force on 4th March 2011
- These Regulations are Regulation (EC) No 1069/2009 and Regulation (EU) 142/2011(as amended)

RESEARCH AND DIAGNOSTIC SAMPLES

Research and Diagnostic samples (R&D) are defined in Annex I point 38 of Regulation (EU) No 142/2011 as:

‘research and diagnostic samples’ means animal by-products and derived products intended for the following purposes: examination in the context of diagnostic activities or analysis for the promotion of progress in science and technology, in the context of educational or research activities;



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What is needed to import R&D samples?

- Needs to be pre-authorized by APHA before the consignment can be imported;
- Will need any documentation as stated in authorisation
- If not pre-authorized consignments will not be permitted entry to the UK.

• What is NOT considered a R&D sample?

- Any product for taste testing – If samples are to be tasted by a human then not an ABP
- Any ABP or ABP product intended to be given out as samples to companies or general public. These must be imported under harmonised or National Rules.

RESEARCH AND DIAGNOSTIC SAMPLES CONT



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When do R&D samples have to come through a BIP?

- Article 27 point 2 of Regulation (EU) No 142/2011 only requires a R&D sample to go through a BIP if the consignment is imported via a MS, other than the MS of destination. (transits)
- At the BIP, R&D samples are not subject to veterinary checks in accordance with Chapter I of Directive 97/78/EC (as amended).
- the BIP should inform the competent authority of the Member State of destination of the introduction of R&D samples by means of the TRACES system.
- R&D samples imported direct to UK can come through any port/ airport.

So do R&D samples need to be vet checked?

- **NO** - No requirement at Annex VI, Chapter I, Section 1 of Regulation (EU) No 142/2011 to state that R&D samples must be vet checked.
- Any checks carried out should only be done as part of the Annual % checks for imported ABP consignments.

AUTHORISATIONS ISSUED BY APHA



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Why can a CA authorise an import of ABP?

Due to the huge variety of ABP and derived products not all can be captured under harmonised conditions or model health certificates/declarations. Therefore a CA may authorise imports provided there is no risk to human or animal health.

Where does the ABP Regs state this?

Examples are:

- Article 41.3 of Regulation (EC) No 1069/2009
- Article 26 of Regulation (EU) No 142/2011 (certain Cat 1 material such as intestines/ bones/ skulls)
- Annex XIV, Chapter IV, Section 2 of Regulation (EU) No 142/2011 (insects/ aquatic animals not for land farm animals)
- Article 27 & 28 of Regulation (EU) No 142/2011 – R&D samples/ Trade samples/ Display items

Why do we issue authorisations?

- To help facilitate Trade to the UK.

AUTHORISATIONS ISSUED BY APHA cont



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What do we look for when considering an authorisation?

- That the consignment isn't covered by harmonised model EHC/ declaration
- If it is, why can't consignment comply
- Completed application form
- Information on the safe sourcing of the material, including country of origin of the ABP
- Processing Methods – this will include documentation from the manufacturer on processing methods/ heat treatments including temperatures and times
- % of ABP in the final product
- Intended use of the ABP or ABP product

When would we consider issuing an authorisation?

- Where there is no harmonised model cert/ declaration available
- Where the ABP Regs allow us to authorise an import
- When there is a model cert/ declaration but consignment can't comply (e.g. manufacturer isn't ABP approved/ produced at a Food establishment/ personal import)

AUTHORISATIONS ISSUED BY APHA cont



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Examples of authorisations issued in the past

- Various Pet supplements and pet treats.
- Laboratory animal feed
- Specialised feed for reptiles and exotic aquatic animals (coral/ amphibians)
- Frozen rodents/ chicks for feeding to reptiles and birds of prey
- Kangaroo bones for dog treats
- Mussel powder to make recreational fishing baits
- Personal imports of old butterfly / animal bone collections
- Deceased family dogs and pets for cremation or home burial
- Animal intestines for the manufacture of enzymes for pharmaceutical use

CONSIGNMENTS STUCK AT A BIP



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When do ABP Policy Team get involved?

- When we are advised by APHA of a request/ problem at a BIP

If ABP is imported and fails its Vet Checks would we permit the import?

- We can consider such requests – All depends on whether consignment was imported with model Health cert/ declaration or under National Rules

Fails Vet Checks -Harmonised model certificate/ Declaration

- Will only consider Cat 2 or Cat 3 ABP
- The ABP will be classed as Cat 2 material as per Article 9(e) of Regulation (EC) No 1069/2009
- Very limited use.
- Need details on why consignment failed vet checks (labelling/ wrong EHC)
- An application will need to be completed by importer, including information on intended use, premises of destination and disposal
- We will NOT permit import unless we are satisfied with sourcing/ processing/ treatments/ intended use as Cat 2 material

CONSIGNMENTS STUCK AT A BIP cont

Fails Vet Checks – ABP normally imported with an authorisation issued under National Rules/ General licence

- Could be issue with labelling/ documentation or importer has no authorisation (new importers)
- Application must be completed by importer
- Need to see copies of all documentation the consignment came in with
- Information on why consignment was denied entry to the UK/ failed vet checks
- Importer to supply information/ documentation on sourcing of ABP material/ processing methods used/ Temperature and timings etc
- Consideration given on intended use of the ABP/ ABP product
- We apply the safe source, safe treatment and safe end use test in assessing the risk
- If the consignment meets these requirements a release letter will be created
- APHA to check with BIP prior to issuing release letter.
- We will NOT permit an import unless all documents are received and we are satisfied with sourcing/ processing/ treatments/ intended use
- Can take a while to complete a request due to delays in getting hold of all information needed from the importer/ manufacturer
- Decisions are based on the information provided by the importer/ manufacturer
- If additional evidence comes to light that casts doubt on the veracity of the initial information provided then this needs to be investigated (by operational staff)

WHOLE DRIED INSECTS

What requirements are in ABP Regs to import whole dried insects?

- Annex XIV, Chapter IV, Section 2 of Regulation (EU) No 142/2011 allows a CA to authorise imports of invertebrates (and larvae and egg form) that pose no risk to animal or human health for uses other than feed to farm land animals provided no risk to human/ animal health
- Imports of consignments shall take place in accordance with sanitary certification requirements in accordance with national rules.
- Only applies to whole dried or frozen invertebrates
- If it is insect meal then it is classed as PAP

When would we authorise imports?

- ABP IIN 26 is available for:
 - dried/ frozen whole insects for feeding to wild birds/ pet fish or feed for fur animals only
 - Manufacturing supplements/ food for wild birds/ food for pet fish/ food for fur animals
- Will consider an authorisation for animal species such as reptiles/ amphibians/ exotic aquatic species/ zoo animals/ rodents where they cannot meet the Chapter 3B certification requirements. (i.e not from an approved ABP establishment)

When would we NOT authorise imports?

- Will not authorise for dog or cat food or manufacturing dog or cat food
- Will not authorise for farmed animals kept as pets (e.g. pet chickens kept in gardens or smallholdings)

WHOLE DRIED INSECTS cont

But what if an importer wants to import whole dried insects to manufacture pet food for dogs and cats?

- Must be imported with Chapter 3B model health certificate (processed pet food)
- Certificate includes use of invertebrates
- Will include establishments being ABP approved & ABP being processed to minimum heat treatments to make it safe for intended use.
- No import authorisation will be issued for use as dog and cat food/ manufacturing dog and cat food.

What about importing insects for feeding to pet chickens?

- Farmed animal species kept as pets are **not** considered to be a pet animal and are classed as farmed animals (livestock)
- **Current legislation ONLY permits insects to be fed to aquaculture animals**
- Insects cannot be fed to any other farm animal species even if kept as a pet animal or in a small holding (non-commercial basis).
- There is an unknown risk from feeding insects and this is a precautionary approach which; in the case of chickens; stops the potential spread of disease to commercial flocks.
- No authorisation will be issued for insects for any land farm animal species.

INSECT MEAL

What is insect meal?

- Insect meal is a processed animal protein (PAP) derived from farmed insects
- Harmonised conditions laid down in Regulation (EU) No 142/2011
- Must have been produced in accordance with Section 1 of Chapter II of Annex X and comply with the additional requirements set out in Section 2 of that Chapter.
- Certain farmed insects can be used
- Specific requirements on what those insects can be fed on
- Must come in with a Chapter 1A model certificate
- Can only be imported for the following uses:
 - Animal feedingstuff – **ONLY FOR AQUACULTURE ANIMAL USE** – NOT PERMITTED FOR FEEDING TO ANY LAND FARM ANIMALS
 - Technical use
 - Manufacture of pet food.

Would we authorise insect meal?

- Authorisation will not be issued for 100% insect meal
- Would consider authorising products containing insect meal if it is mixed with other ABP/ plant material for animals other than pet dogs and cats or farm animals (e.g. a processed finished feed in ready to sell packets which contain a mix of fishmeal/ dried insects/ fruit/ vitamins/ eggs/ seaweed etc for feeding to animals such as reptiles and exotic aquatic pets like coral/ clownfish/ amphibians).

ANY OTHER QUESTIONS?

