



Animal &
Plant Health
Agency

APHA Briefing Note 16/22

Updated guidance on triangular trade of products of animal origin

Date issued: 6 April 2022, Updated 07 December 2023

Update at paragraph 9.

Purpose

1. To update OVAs with guidance for certifying POAO of Rest of World and EU origin for re-export to the EU and movement to Northern Ireland.

Background

2. Following recent technical discussions with the European Commission, Defra is issuing updated Notes for Guidance with additional information in relation to triangular trade. Triangular trade is when a product is imported from one country into Great Britain and then re-exported to another.
3. The UK Government has updated the guidance to articulate the EU's current interpretation in respect of this type of movement, given the risk of refusal of consignments at EU Border Control Posts (BCPs).
4. The UK will seek to raise this issue at the Trade and Cooperation Agreement's SPS Trade Specialised Committee for an explanation of how this interpretation is consistent with obligations under the TCA.
5. The guidance applies to exports to the EU from GB, but does not apply to movements to Northern Ireland, which can continue as they have done since 1 January 2021 under the existing '[standstill](#)' arrangement, announced on 10th September 2021.

Update on triangular trade

6. Notes for Guidance are being updated to show the EU's position that conditions apply to two specific types of triangular trade involving products of animal origin (POAO):
 - a. To re-export Rest of World (ROW) origin POAO to the EU, the product must undergo further processing in GB for it to be eligible to export to the EU. Rest of World products can still be imported to GB, processed into a new product, and re-exported to the EU if it meets the requirements of the EHCs.

Example: New Zealand lamb, cannot be re-exported to the EU unless it has been subject to a process as defined in the Notes for Guidance – such as heating, drying, marinating, etc. New Zealand origin lamb could be processed into meat preparation or meat product in GB (e.g. cooked lamb) and re-exported to the EU.
 - b. To re-export EU origin POAO that has been imported into GB the product must be either undergo further processing to make it eligible to be exported to EU. Alternatively, the product can be exported to EU using [EHC 8461](#) as long as the product has not undergone any further handling beyond unloading, reloading, storage, and transport; has not been removed from the original packaging and been subject to a process which does not meet the definition of further processing.
7. A small number of EU EHCs contain no animal health attestation for example Honey. If the product originated from ROW it can be re-exported without further processing in GB. It does not affect the use of ROW origin POAO for production on an entirely new composite product in GB.
8. **Processing** is generally defined as any process that substantially alters the initial product **including** heating, smoking, curing, maturing, drying, marinating, extraction, extrusion, or a combination of these processes.

Update 07 December 2023

9. After 15 January 2024, this guidance, which did not previously apply to movements to Northern Ireland, will also apply to POAO consignments leaving Great Britain for movements to Northern Ireland that require an Export Health Certificate. Separate rules apply to products that are eligible to move to Northern Ireland via the [Northern Ireland Retail Movement Scheme](#).

Further Information

- [FAQs for certifiers on AHR](#)
- If you have any questions about the AHR and the new EHCs please contact:
exports@apha.gov.uk