

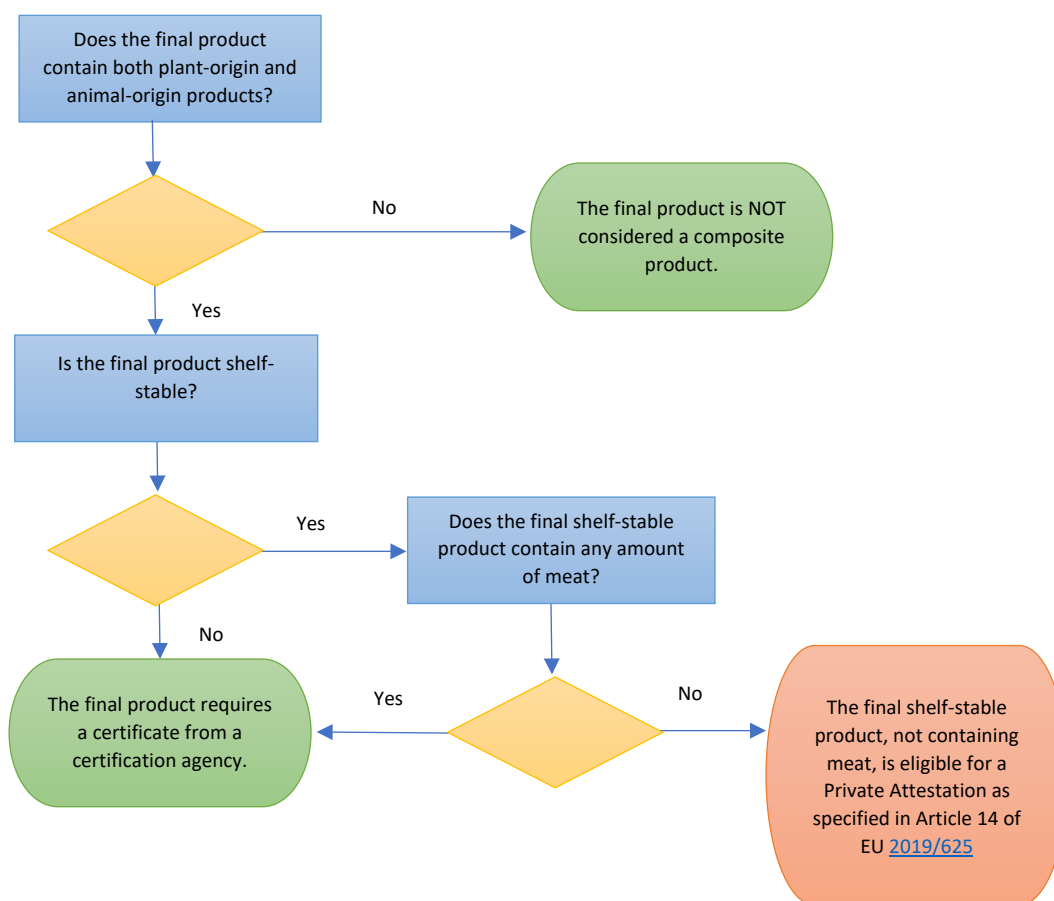
## USDA Agricultural Marketing Service (AMS) Dairy Program Reference Document on European Union (EU) Composite Product Certificates

On January 15, 2022, new EU requirements for exports of composite product foods go into effect. This document is intended to serve as a quick reference for stakeholders to use in determining if a composite product certificate is required for a finished product and/or which certification agency is responsible for issuing the certificate. Additionally, helpful information to prepare stakeholders for requesting EU composite product certificates from AMS is included.

### Background: Does my composite product need a certificate from a certification agency?

The EU defines a composite product as a food product containing both processed products of animal origin (dairy, egg, fishery, or meat<sup>1</sup> products) and products of plant origin. Figure 1 below provides a flow chart to assist in determining if a food product is a composite product and if the composite product requires a certificate issued by a certification agency.

**Figure 1: Determination of a Composite Product**



<sup>1</sup> Collagen, gelatin, and highly-refined products derived from meat are not considered "meat products" for these categories.

If a composite product is shelf-stable and does NOT contain any meat product, the product is eligible to enter the EU market through use of the Private Attestation form provided in Annex V in Article 14 of EU [2019/625](#). Exporters of shelf-stable composite products NOT containing meat may complete the Private Attestation form.

A composite product certificate from a certification agency is required if:

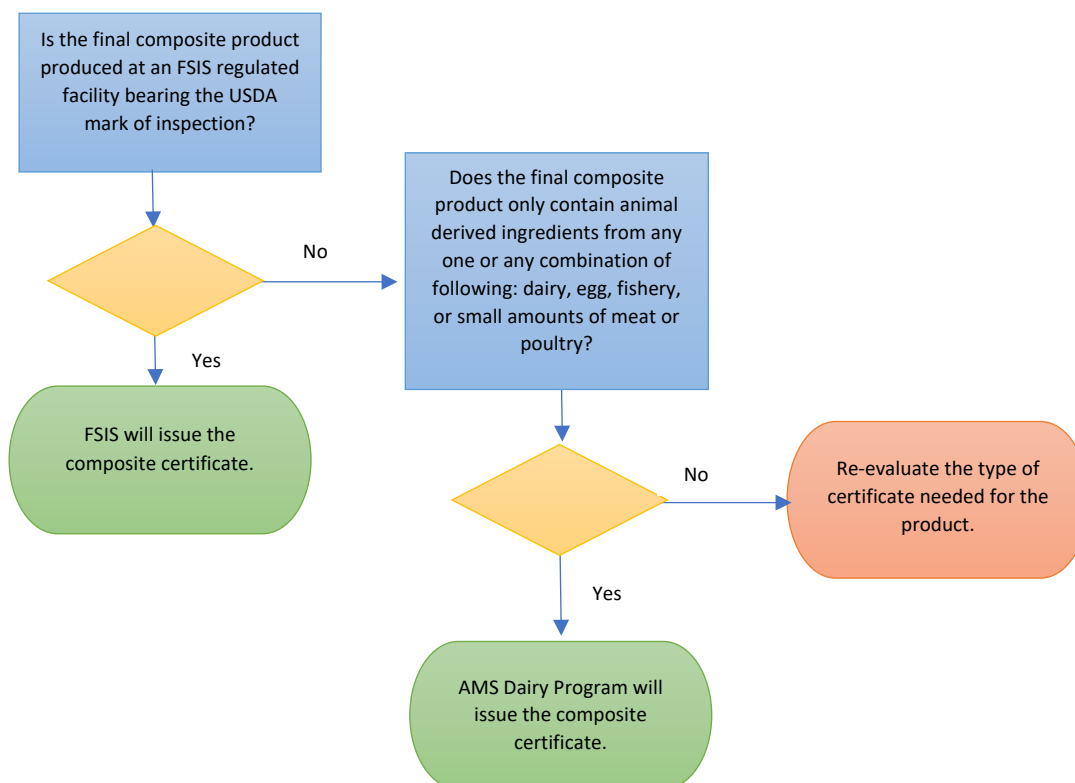
1. A shelf-stable composite product contains meat, or
2. The composite product is NOT shelf stable.

### What agency provides a certificate for my composite product?

The Food Safety and Inspection Service (FSIS) will issue the composite products certificate for composite products containing dairy, egg and meat if the composite product is manufactured in a FSIS regulated facility and bears the [USDA mark of inspection](#). Note: Certain products containing small amounts of meat, poultry, or egg products as an ingredient are exempt from FSIS inspection. As an example, composite products containing 3% or less raw meat, or less than 2% cooked meat or poultry are regulated by the Food and Drug Administration (FDA).

The Agricultural Marketing Service, Dairy Program will issue the composite products certificate for products containing dairy, egg, fishery, or small amounts of meat when composite products are NOT produced in a FSIS regulated facility and do not bear the USDA mark of inspection, regardless of whether dairy is an ingredient in the composite product. Figure 2 below provides a flow chart to assist in determining which agency is appropriate to provide a specific composite product certificate.

**Figure 2: Determination of Certification Agency**



## What information do I need to apply for composite product certificate produced at an FSIS regulated facility?

- All animal-derived ingredients must be sourced from EU listed/approved facilities and the EU approval number must be provided when applying for a certificate.
- All dairy ingredients must be accompanied with a Certificate of Conformance as described in the AMS Dairy Program's Export Verification Program (EVP) for the EU.
- More detailed information is available at [FSIS Export Library \(EU Requirements\)](#).

## What information do I need to apply for a composite product certificate from AMS Dairy Program?

**This section is applicable for the Chapter 50 Composite Product certificate for products intended for consumption within the EU.**

### Composite product manufacturer

Composite product manufacturers are not required to be on an EU approved list; however, composite product manufacturers are required to be registered by the competent authority. If a composite product manufacturer is on an EU list, provide the EU listed number to identify the facility. If a composite product manufacturer is not on the EU list, provide the FDA Establishment Identifier (FEI) number to identify the facility.

The manufacturing facility's identification number on the product packaging must be identical to the manufacturing facility's identification number on the approval list. This will be the identification number for the composite product manufacturer identified on the composite product certificate and it MUST be identical to the identification number on the composite product packaging.

### Animal derived ingredients

Each animal derived ingredient in a composite product is required to be sourced from an EU listed facility. To ensure a facility is EU listed, check the EU's Integrated Management System for Official Controls - Trade Control and Expert System "[\(IMSOC TRACES\) Establishment Lists](#)" website to ensure U.S. facilities are properly listed. Additionally, if a foreign sourced animal derived ingredient is used, check the appropriate country's list to be certain the facility is EU listed. All sources of animal derived products must be EU listed and the EU listed number must be provided, regardless of the country of origin. If multiple facilities provided animal derived ingredients, all facilities must be identified with their EU number. Special Note for any foreign sourced animal derived ingredients: In addition to providing the facility EU number, exporters must also identify the country of origin, facility name, city, region (state), date the number was obtained from the EU facility list website and provide a copy of the EU facility list identifying the ingredient supplier(s).

- Dairy ingredients must be identified with each ingredients' manufacturing facility EU approved establishment number along with the manufacturing date or date range for those dairy ingredients. Additionally, a Certificate of Conformance as described in the AMS Dairy Program's [Export Verification Program](#) must be provided.
- Egg ingredients must be identified with each ingredients' EU approved establishment number. Special note on composite products containing egg products: Composite product manufacturers utilizing egg products as an ingredient must participate in the AMS [Processed Egg and Egg Products Verification Program](#) to be eligible for an EU Composite Product Certificate.

- Fishery product ingredients must be identified with each ingredients' EU approved establishment number.
- Meat or poultry product ingredients must be identified with each ingredients' EU approved establishment number along with the species, treatment and country of origin of the product. Additionally, to ensure the meat or poultry ingredient(s) meet specific EU requirements, a copy of the EU Health Mark for the meat or poultry ingredient(s) and their applicable production codes must be provided. This information will support that the meat or poultry ingredient(s) participate in the applicable EU EVPs such as the Non-Hormone Treated Cattle (NHTC) Program: Beef and Veal, the Pork for the European Union (PFEU) Program, or the Poultry Export Verification (PEV). Details on these programs are provided in the [FSIS Import & Export Library for the European Union](#) in the "Other Requirements" section. Special note for foreign source meat product ingredients: If a foreign sourced meat product is utilized as ingredient in a composite product, first confirm via the [FSIS Import & Export Library](#) that the supplier is eligible to import the meat product into the U.S. Second, referencing the "[IMSOC TRACES Establishment Lists](#)," obtain the EU approved facility identification number and other required information to request a certificate.

#### Cold Storage Facilities

If a composite product is shipped from a cold storage facility, the cold storage facility must be on an EU approved facility list. Thus, if a composite product is shipped from a cold storage facility, provide the EU approved cold storage facility number.

#### **What information do I need to apply for a composite product transit certificate from AMS Dairy Program?**

**This section is applicable for the Chapter 52 Composite Product Transit certificate for products transiting through the EU to another country.**

#### Composite product manufacturer

Composite product manufacturers are not required to be on an EU approved list; however, composite product manufacturers are required to be registered by the competent authority. If a composite product manufacturer is on an EU list, provide the EU listed number to identify the facility. If a composite product manufacturer is not on the EU list, provide the FEI number to identify the facility.

The manufacturing facility's identification number on the product packaging must be identical to the manufacturing facility's identification number on the approval list. This will be the identification number for the composite product manufacturer identified on the composite product certificate and it MUST be identical to the identification number on the composite product packaging.

#### Animal derived ingredients

U.S. sourced animal derived ingredients included in composite products transiting through the EU are NOT required to be sourced from an EU listed facility. However, if a facility is not on an EU list, a U.S. regulatory agency identification number must be provided for the facility.

- Dairy ingredients must be identified with each ingredients' facility number. This may be an EU approved establishment number, an Interstate Milk Shipments number, USDA plant number or

FEI number. Along with the manufacturing facility number, the manufacturing date or date range for those dairy ingredients must also be provided. Additionally, a Certificate of Conformance as described in the AMS Dairy Program's [Export Verification Program](#) must be provided.

- Egg ingredients must be identified with each ingredients' facility number. This may be an EU approved establishment number, FEI number or USDA plant number.
- Fishery product ingredients do NOT require information to be included on the Chapter 52 transit certificate.
- Meat or poultry product ingredients must be identified with either each ingredient suppliers' EU listed number or the [FSIS establishment number](#). Additionally, meat or poultry product ingredients from the U.S. must be on the "[Official Listing for Eligible Suppliers for the USDA Export Verification Program for Products Transiting the EU.](#)" Special note on Chapter 52 Composite Product Transit certificates: Because the composite product is not destined for the EU, foreign sourced meat/poultry ingredients are not required to be on EU lists. However, the supplying establishment must be on the relevant [FSIS Eligible Foreign Establishments list](#). Finally, the species, treatment, and country of origin of the product must be identified.

#### **Certification Agency Contact Information:**

USDA, AMS, Dairy Program  
Dairy Grading Branch, Export Team  
Phone: 202-720-3171  
Fax: 844-804-4701  
E-mail: [DairyExportsQuestions@usda.gov](mailto:DairyExportsQuestions@usda.gov)

Food Safety and Inspection Service (FSIS)  
Office of Policy and Program Development (OPPD)  
Import/Export Program Development Staff (IEPDS)  
Phone 202-720-0082  
E-mail: [importexport@usda.gov](mailto:importexport@usda.gov)

#### **Other Agency Contact information:**

For questions about the AMS Dairy Program Certificate of Conformance for dairy ingredients:

USDA, AMS, Dairy Program  
Dairy Grading Branch, Audit Services  
Phone: 559-509-2599  
Fax: 844-804-4701  
E-mail: [DairyAuditServices@usda.gov](mailto:DairyAuditServices@usda.gov)

For questions about the AMS [Processed Egg and Egg Products Verification Program](#):

USDA, AMS, Livestock and Poultry  
Quality Assessment Division, Auditing  
Phone Number: 501-766-4782  
Fax Number: 202-690-2746  
E-mail: [EV.Export@usda.gov](mailto:EV.Export@usda.gov)