

EXPORT OF FRESH MEAT AND MEAT BY-PRODUCTS TO THE UNITED STATES OF AMERICA
1631EHC

NOTES FOR THE GUIDANCE OF EXPORTERS AND OFFICIAL VETERINARIANS

IMPORTANT

These notes provide guidance to Official Veterinarians (OVs) and exporters and should have been issued to you together with export certificate 1631EHC. These Notes for Guidance (NFG) are not intended to operate as a standalone document but in conjunction with certificate 1631EHC.

Exporters are strongly advised to verify the requirements of the importing country by contacting the veterinary authorities, or their representatives in the UK, in advance of each consignment.

OVs should further note that the US authorities are exacting in their requirements for the completion and issue of the certificate 1631EHC. Failure to comply in full with the instructions contained in these notes may result in rejection of a consignment.

1. SCOPE OF THE CERTIFICATE

The title of 1631EHC permits export to the USA of pig meat, pig meat products and bovine meat and bovine meat products.

The [UK Import Library](https://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/eligible-countries-and-products/eligibility-chart-united-kingdom) on the FSIS website reflects the current list of eligible products.

<https://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/eligible-countries-and-products/eligibility-chart-united-kingdom>

It is a mandatory requirement that each exporter provides the correct entry for each of the following; Process Category, Product Category and Product Group. The FBO seeking to export must include these details in the initial application, submitted to CIT in Carlisle. See paragraph 3 for examples.

Exports may take place only from premises/establishments specifically authorised by the Department as eligible to export to the US.

A copy certificate - 1631COP - is also required to be completed. OVs should note that the certificates issued to them have been printed with ORIGINAL or COPY on the top of the first page. One original certificate and one signed copy bearing the same serial number must be issued for each consignment.

2. CERTIFICATION BY AN OFFICIAL VETERINARIAN (OV)

In Great Britain, this certificate may be signed by a Veterinary Officer of the Department or by an authorised Official Veterinarian (OV) appointed to the appropriate panel for export purposes by the Department for Environment, Food and Rural Affairs (Defra), the Scottish Government or the Welsh Government, or who holds the appropriate Official Controls Qualification (Veterinary) (OCQ(V)) authorisation.

In Northern Ireland, this certificate may be signed by A VETERINARY OFFICER OF THE DEPARTMENT OR an Authorised Veterinary Inspector (AVI) appointed as an OV to the appropriate export panel for export purposes by the Department of Agriculture, Environment and Rural Affairs (DAERA).

OVs must stamp the health certificate with the OV stamp in any ink colour **OTHER THAN BLACK**. The veterinary signature on the certificate must be in blue ink. Correction fluid **MUST NOT** be used anywhere on the certificate. No alterations may be made to the text on the certificate.

Under date of signature at the foot of the certificate, OVs should enter the place/city where the certificate was signed to meet US import requirements.

A certified copy of the completed certificate must be sent to the Animal Plant and Health Agency (APHA) Centre for International Trade at Carlisle within seven days of signing, or in the case of Northern Ireland to DAERA, Dundonald House, Belfast.

The OV should keep a copy for his/her own records.

3. NEW US IMPORT REQUIREMENTS

Paragraphs I(a) and II(b) refer. The US Department of Agriculture's Food Safety and Inspection Service (FSIS) recently published new import requirements which have resulted in two amendments to the previous certificate, as follows:

- the process category, product category and product group must be included on the export health certificate for each of the products listed on the certificate;
- in cases where source materials originate from outside the UK, FSIS now requires details of the source country and establishment on the certificate - see paragraph 4 below;

FSIS have also introduced measures to prevent export of products from premises/establishments while they are delisted and therefore ineligible to export to the US. An additional certificate mentioning the production (slaughter/processing) dates will be required as per [Directive 9900.1](#).

To improve on identification, traceability and certification of the product to USA and avoid potential queries by US officials at the point of entry, the table at **Section II (c)** of the certificates should include the production dates as per the example below:

(c) *Final processing/producing establishment in the United Kingdom*

Lot	Name, address and establishment number of final processing/producing establishment
1	NAME - ADDRESS - APPROVAL NUMBER OF FINAL PROCESSING/PRODUCING ESTABLISHMENT PRODUCTION DATE: DD/MM/YYYY TO DD/MM/YYYY

This will allow USA officials to confirm that the country, the establishments involved in the chain of production of the meat and the product itself was eligible for export to USA at the time of production.

See also paragraph 4 below.

A fuller description of the new FSIS categories (first bullet point refers) is at **Annex 1** to these notes.

Process Category, Product Category, Product Group and Kind of Products

Paragraph I(a) refers. The categories of commodities currently exported to the USA are pork cuts, primals and subprimals. A summary of the descriptions that should be used for these commodities in paragraph 1(a) is as follows:

Process Category	Product Category	Product Group	Kind of Products	Species
Raw Product - Intact	Raw Intact Pork	Cuts	Pork ribs	Pork
Raw Product - Intact	Raw Intact Pork	Primals and Subprimals	Larger pork cuts	Pork
Raw - Non intact	Non-intact beef	Bench trim from Non-intact; Formed steaks; Non-intact cuts; Trimmings from non-intact	Precursor trim	Beef, Veal
Raw - Intact	Raw intact beef	Cuts; edible offal; primals and subprimals	Strip loin Rib eye Cube roll	Beef, Veal

In the case of export of other commodities, exporters and OVs are advised to contact CIT in Carlisle for further advice on their categorisation.

[Directive 9900.1](#) also requires each lot to be separately identified by its own shipping/identification mark to facilitate Port of Entry (POE) re-inspection.

NB. The description of type of product in paragraph I(a) must precisely match the description on the packaging labels.

4. APPROVAL OF ESTABLISHMENTS TO EXPORT TO THE UNITED STATES

All establishments in the supply chain, i.e. slaughterhouse, cutting premises and cold store must be approved for export to the US. Under no circumstances should meat be exported from plants which are not specifically approved to do so.

In the case of UK establishments, OVs must confirm premises/ establishment approval by sight of the relevant documents of approval or by reference to the Centre for International Trade at Carlisle. USDA FSIS also maintains a list of foreign establishments which are eligible including dates when they were delisted and relisted:

<http://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/importing-products/eligible-countries-products-foreign-establishments/eligible-foreign-establishments>

This list must be consulted to ensure only US eligible product is processed at the UK establishment if intended for export to the US.

5. REGIONS REGARDED BY US REGULATIONS AS FREE FROM EPIZOOTIC DISEASE

Paragraph IV (a) refers; it may be certified if the meat has been produced in an establishment that is approved to export to the states and is compliant with domestic and US requirements. 9 CFR §327.2 can

be found in this link:

https://www.govregs.com/regulations/expand/title9_chapterIII_part327_section327.2#title9_chapterIII_part327_section327.2

Paragraphs IV(b), IV(c), IV(d), IV (e) and IV(f) refer to countries listed in Article 94.1(a)(2), Article 94.9(a), Article 94.10(a), and Article 94.12(a) of the United States Code of Federal Regulations (CFR).

The current health statuses of countries/regions as recognised by USDA, as per CFR articles, can be found at:

<https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/animal-and-animal-product-import-information/animal-health-status-of-regions>

6. ORIGIN OF ANIMALS FROM WHICH THE EXPORTED MEAT IS DERIVED

In case the United Kingdom is regionalised following a disease outbreak, paragraphs IV (b), (c), (d) and (e) may be signed on the basis of familiarity with the procurement arrangements and examination of company records of the plant. Where possible, this may be cross referenced to Animal Transport Certificates which hauliers are required to keep under Article 8(1) of The Welfare of Animals (Transport)(England) Order 2006 and parallel national legislation in Scotland, Wales and Northern Ireland.

The United Kingdom is listed in Article 94.1(a)(2) as free of foot and mouth disease and in Article 94.12(a) as a country free of swine vesicular disease. Company records must be checked to confirm that the meat has never been in a country/region which is not listed in article 94.1(a)(2) [See Note 5 above].

7. MEANS OF CONVEYANCE AND SEALING

Paragraph IV(e) refers to the 'means of conveyance that will bring the article to the United States'. This should be interpreted as meaning the container in which the products are transported. To ensure that the meat products are transported 'in a manner to preclude them being commingled or otherwise [come] in contact with meat or other animal products that do not comply with the conditions contained in this certificate', the officially/commercially accepted method is to seal the container with a numbered seal. There is no longer a requirement to note the seal number on the certificate, so it is advisable to mention it in any accompanying commercial document e.g. waybill. If one wants to note the seal number (and the container number) on the certificate as well (even though not officially required), then the best place to do so is at paragraph III(d).

8. ADDITIONAL GUIDANCE FOR COMPLETION OF PARAGRAPH IV(f)

Subparagraph IV (f)(ii) refers. The periods described in this subparagraph refer to the periods stated in paragraph IV(f)(i).

Subparagraph IV (f)(v) may be signed on the basis of a written declaration provided by the exporter/agent, on the basis of legal compliance with the requirements below, of the exporter stating **either:**

- a) the equipment and vehicles have only been used for transporting swine that **meet** the requirements of paragraph IV(f)(i)(1) through (f)(i)(3) of certificate 1631EHC; **or**
- b) the equipment and vehicles have been used for transporting swine

that do not meet the requirements and have been cleaned and disinfected.

OVs should keep copies of the declaration for record purposes.

Meat Transport Vehicle: Reg.852/2004 ANNEX II, CHAPTER IV, requires that vehicles used to transport meat/ products are kept cleaned and disinfected and they maintained to adequate hygiene conditions.

Livestock Transport Vehicles: The Transport of Animals (Cleansing and Disinfection) (England) (Wales) (No.3) Orders 2003 (and equivalent Orders in Scotland and N. Ireland). In the case of poultry only, *Regulation (EC) No. 853/2004, Annex III, Section II, Chapter I, Paragraph 3 also applies.*

In general:

1. Conveyances and/or containers used for transporting foodstuffs are to be kept clean and maintained in good repair and condition to protect foodstuffs from contamination and are, where necessary, to be designed and constructed to permit **adequate cleaning and/or disinfection.**

2. Where conveyances and/or containers have been used for transporting anything other than foodstuffs or for transporting different foodstuffs, there is to be **effective cleaning** between loads to avoid the risk of contamination.

Specifically:

1. The cleansing & disinfection of vehicles used to transport meat is satisfactory when carried out on site otherwise the FBO ensures that driver completes FM/AW 27 if C&D is done elsewhere

2. All equipment and vehicles used for collecting and delivery livestock are cleaned, washed and disinfected immediately after use in the approved establishment unless the driver provide assurances (FM/AW 27) that it will C&D somewhere else nearby

9. ADDITIONAL GUIDANCE FOR COMPLETION OF PARAGRAPH IV (g)

Either paragraph (g) (i) or g (ii) must be deleted as applicable. If paragraph (g) (ii) is chosen, either the first four indents or the last three indents must be deleted as applicable.

Paragraph (g) may be certified based on personal knowledge of the plant processes or based on a supporting declaration signed by an Official Veterinarian.

Regardless of the BSE risk status of the country/zone of the origin of the cattle, the US consider the following as SRM and they must be removed as such but can be disposed of according to EU requirements:

- The brain, skull, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), and dorsal root ganglia from cattle 30 months of age and older and
- The distal ileum of the small intestine and the tonsils from all cattle.

10. ** IMPORTANT **** REFERENCES TO APPROVAL NUMBERS FROM 31/08/2019**

The UK has reached an agreement with the USA to update the details of the approval numbers of all UK establishments requiring listing with the USA. **With effect from 31/08/2019** the approval/registration

numbers for establishments listed to export fresh meat and meat by-products to the USA will cease to have references to "UK" or "EC". From that time, approval/registration numbers will include the central unique identifier code ONLY [four numerical digits for abattoirs (under FSA/FSS/DAERA control) - or - five/six alpha-numerical digits for cold stores, dairy and fish establishments (where under local authority approval)].

The format of the approval/registration number including the "UK" prefix and the "EC" suffix shall continue to be used and entered in Sections II(a), II(b) and II(c) of 1631EHC export health certificates signed before and up to 31/08/2019.

The format of the approval/registration number without the "UK" prefix and the "EC" suffix shall be used and entered in Sections II(a), II(b) and II(c) of 1631EHC export health certificates signed after 31/08/2019.

Illustrative examples

Format to be used in export health certificates SIGNED BEFORE 31/08/2019	Format to be used in export health certificates SIGNED AFTER 31/08/2019
UK 2090 EC	2090
UK AB123 EC	AB123

Consignments certified before 31/08/2019 (which must contain UK and EC references in the approval/registration number) will be accepted for export to the USA upon arrival within a transitional period of 6 months after 31/08/2019.

THE NEW FORMAT APPLICABLE FROM 31/08/2019 MUST BE USED IN ALL DOCUMENTS ASSOCIATED WITH EXPORTS OF FRESH MEAT AND MEAT BY-PRODUCTS TO THE USA, INCLUDING INTERNAL MOVEMENT CERTIFICATES OR SUPPORT HEALTH ATTESTATIONS SIGNED FROM THAT DATE.

The authorities of the USA will expect that the details of the establishments entered onto the certificate are both correct, consistent and in accordance with their own records of approved establishments. Approval codes, and other details, should exactly match the details as listed on the US Department of Agriculture's Food Safety and Inspection Service (FSIS) website https://www.fsis.usda.gov/wps/wcm/connect/5b82df32-6593-4913-a7a6-9d5146547280/United_Kingdom_establishments.pdf?MOD=AJPERES.

The new listing by the USA replaces the previous listings by US Department of Agriculture's Food Safety and Inspection Service (FSIS).

Health/ID marking of products: The USA will accept consignments of product bearing either the current format of oval health/ID marks (with "UK" and "EC") or any other acceptable format prescribed by the UK authorities following the UK's exit from the EU. Some consignments might contain a mix of products which each might bear different health/ID marks. Products will be identified as originating from the final establishment of production by cross-reference with the central unique identifier number of the establishment in the oval mark/stamp of the product.

11. **DISCLAIMER**

This certificate is provided on the basis of information available at the time and may not necessarily comply fully with the requirements of the importing country. It is the exporter's responsibility to check the certificate against any relevant import permit or any advice provided by the competent authority in the importing country.

If these do not match, the exporter should contact the APHA Centre for International Trade at Carlisle, via:

<https://www.gov.uk/government/organisations/animal-and-plant-health-agency/about/access-and-opening>

or, in the case of Northern Ireland, DAERA Belfast.

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FOOD SAFETY AND INSPECTION SERVICE (FSIS) PRODUCT CATEGORISATION

FSIS has developed the following guidance to assist with accurate identification of the meat, poultry, and egg products certified for export to the United States.

Process Category

There are nine process categories identified in 9CFR 417.2(b). Of the nine listed, slaughter is considered an internal process and is not used for imported products. An additional process category that is not contained in 9CFR 417.2(b) is Egg Products.

1. Raw Product - Non-Intact: This process category applies to establishments that further process by using processing steps such as grinding, comminuting, injecting product with solutions, or mechanical tenderization by needling, cubing, pounding devices or other means of creating non-intact product. Examples of finished products in this category include raw products reconstructed into formed entrees, mechanically separated species and advanced meat recovery product. If the establishment produces bench trim or pieces of meat produced from non-intact meat, then the bench trim or pieces are also considered non-intact.

2. Raw Product - Intact: FSIS considers raw products to be intact unless they have undergone any of the processes associated with the Raw Product - Non-Intact process category.

3. Thermally Processed - Commercially Sterile: This process category applies to establishments that use a thermal processing step. Thermally processed, commercially sterile finished products are products in cans or flexible containers such as pouches, or semi-rigid, as in lunch bowls.

4. Not Heat Treated - Shelf Stable: This process category applies to establishments that further process by curing, drying, or fermenting processing step as the sole means by which product achieves food safety. Establishments in this process category may apply a low-level heat treatment as long as the heat treatment is not used as means to achieve food safety. The finished products produced under this Process Categories are shelf stable. FSIS does not require shelf stable products to be frozen or refrigerated for food safety purposes.

5. Heat Treated - Shelf Stable: This process category applies to establishments that further process by using a heat treatment processing step to achieve food safety in combination with curing, drying, or fermenting processing step to achieve food safety. The finished products produced under this process category are shelf stable. FSIS does not require shelf stable products to be frozen or refrigerated for food safety purposes. If the establishment produces using the processing steps applicable under this process category and the product is not shelf stable, then establishment is producing product under the process category Fully Cooked - Not Shelf Stable.

6. Fully Cooked - Not Shelf Stable: This process category applies to establishments that further process products by using primarily a full lethality heat process step (e.g. cooking) to achieve food safety. The finished products that establishments produce under this process category are not shelf stable. FSIS requires the products to be frozen or refrigerated for food safety purposes.

7. Heat Treated but Not Fully Cooked - Not Shelf Stable: This process category applies to an establishment that further processes products that are (1) not ready-to-eat products (NRTE) or (2) raw otherwise processed products that are refrigerated or frozen throughout the product's shelf life. Meat and poultry products are produced using a heat process that meets one of the following criteria:

- (a) The heat processing step is not adequate to achieve food safety. Products may be partially cooked or heated to set batter on a raw product.
- (b) The heat processing step applied to meat or poultry component was adequate to achieve food safety, however product is further processed, assembled or packaged so that cooked meat or poultry products contacts non- ready to-eat product ingredients. In this case, the final product is in a form that is not edible without additional preparing to achieve food safety. An example of this product is pot pie product that contains cooked chicken and raw dough.

NOTE: This category may also include products that receive a full lethality treatment but there is no standard of identity defining them as fully cooked (e.g., hotdogs or barbecue) or a common or usual name that consumers understand to refer to RTE product (e.g. pâtés).

8. Products with Secondary Inhibitors - Not Shelf Stable: This process category applies to establishments that further process by using a curing processing step or a processing step using other ingredients that inhibit bacterial growth.

These products are generally refrigerated or frozen throughout the product's shelf life. Depending on the process and ingredients, these products may or may not meet the definition of RTE as defined in 9 CFR 430.1.

9. Eggs/Egg Products: This process category applies to dried, pasteurized and unpasteurized egg products.

Product Category (with Applicable Species)

The Product Categories are shown in the FSIS Product Categorization table (see below) with the appropriate species indicated for each.

The Species designations FSIS is using for PHIS are:

- for meat: beef, veal, pork, lamb, mutton, and goat;
- for poultry: chicken, turkey, duck, goose, guinea, and squab, including for ratites: emu, ostrich, and rhea;
- for eggs: chicken, turkey, duck, goose and guinea; and
- for egg products: chicken, turkey, duck, goose, and guinea fowl.

For each product, the certification must indicate which species is predominant in the product to assure the appropriate regulations are applied to the product when applicable.

Product Group

The product group defines the product down to a level that FSIS can program appropriate types of inspections (TOI) for examinations and laboratory sampling. Regulatory references are added where applicable for clarification.

While these appear to be self-explanatory, for Raw Product - Intact, cuts are cuts of meat (e.g., steaks, chops, etc.) that are below the Primal and Subprimal level.

The following table is an extract taken from FSIS guidance notes, which cover meat from all species. This table covers only pork products, since only pork products are eligible for export to the US from the UK.

SPENCING

FSIS Product Categorization table*

Process Category	[Finished] Product Category	Product Group	Species
Raw Product - Intact	Raw Intact Pork	<ul style="list-style-type: none"> - Carcass (including halves or quarters) - Primals¹ and sub-primals - Cuts² - Boneless manufacturing trimmings - Edible offal - Other intact 	Pork
Raw Product Non-Intact	Raw ground, comminuted or otherwise non-intact pork	<ul style="list-style-type: none"> - Ground product - Sausage - Other non-intact (includes Partially Defatted Pork Fatty Tissue (PDPFT)) - Advanced meat recovery product (AMR) - mechanically separated 	Pork
Raw Product - Intact	Raw intact beef	<ul style="list-style-type: none"> •Boneless Manufacturing Trimmings •Carcass (including carcass halves or quarters) •Cheek Meat •Cuts •Edible Offal •Head Meat •Heart Meat •Other Intact •Primals and Subprimals •Weasand Meat 	Beef, Veal
Raw Product Non-Intact	Raw ground, comminuted, or otherwise non-intact beef	<ul style="list-style-type: none"> •Advanced Meat Recovery Product (AMR) •Beef Patty Product •Bench Trim from non-intact •Finely Textured Beef •Formed Steaks •Ground Beef •Hamburger •Low Temperature Rendered Product •Non-Intact Cuts •Other Non-Intact •Partially Defatted Beef Fatty Tissue (PDBFT) •Partially Defatted Chopped Beef (PDCB) •Sausage •Trimmings from Non-Intact 	Beef, Veal

* This is NOT the scope of the EHC but the FSIS categorisation of all products. Please refer to the link provided in paragraph 1 of this NFG to check the scope.

Updates of this table should be checked in the FSIS website.

<https://www.fsis.usda.gov/wps/wcm/connect/abbf595d-7fc7-4170-b7be-37f812882388/Product-Categorization.pdf?MOD=AJPERES>

¹ USDA Pork Primals are defined as follows: ham, belly, loin, shoulder, and jowl.

² Includes pork ribs