

# EU COMPOSITE PRODUCTS REGULATIONS

GAIN INSIGHT TO THE NEW REQUIREMENTS FOR THE COMPOSITE  
PRODUCTS EXEMPTED FROM BORDER CONTROLS







# Contents



## ESSENTIAL POINTS TO COVER

There has been a world of changes over the past year; we understand it's hard to stay on top of everything. Our webinars and whitepapers are designed to help keep you on top of the most important news, especially around customs compliance and border controls.

In this document, we'll take a look at the changes around Composite Products, what potential issues there might be, details of key date changes and what it all means.

As always, our team are available to talk to should you have any more questions.

# WHAT WILL CHANGE?



## **NEW REQUIREMENTS FOR THE COMPOSITE PRODUCTS EXEMPTED FROM BORDER CONTROLS**

Exempted 'composite products' (food containing both products of plant origin and processed products of animal origin) need to be shelf-stable, not containing processed meat and listed in the enclosed annex + meet the requirements of Article 3(1) (a) to (d).



## **NEW DOCUMENTATION FOR COMPOSITE PRODUCTS EXEMPTED FROM BORDER CONTROLS**

Products meeting the above requirements (e.g. confectionery) will still be exempted from border controls but they will need to be accompanied by a private attestation.



IMPORTANT - The transition concerns ONLY certification requirements.  
IT DOES NOT AFFECT THE APPLICATION of Articles 12, 13 and 14 of Regulation (EU) 2019/625 for composite products.

Effect of the transition established by Article 35 of Commission Regulation (EU) 2235/2020 on the imports of composite products into the EU after 21 April 2021 and until 20 October 2021.

Before 21st April 2021		After 21st April 2021		What certification during transition until 20th October 2021?		
Composite Product	Was a certificate required?	Categorisation	What is required?	Does the transition apply?	Why?	What is accepted?
Containing more than 50% of processed product of animal origin	Yes (1)	Non shelf stable	The new certificate (2)	Yes	A certificate was required before 21st April 2021	The old certificate (1) shall be accepted until 20th October 2021, provided it was signed for before 21st August. The new certificate (2) is accepted.
		Shelf-stable containing meat products (except gelatine, collagen and highly refined products	The new certificate (2)	Yes	A certificate was required before 21st April 2021	The old certificate (1) shall be accepted until 20th October 2021, provided it was signed for before 21st August. The new certificate (2) is accepted.
		Shelf-stable but not containing meat products (except gelatine, collagen and highly refined products	The new private attestation (3)	Yes	A certificate was required before 21st April 2021	The old certificate (1) shall be accepted until 20th October 2021, provided it was signed for before 21st August. The new private attestation (3) is accepted.
Containing any quantity of meat	Yes (1)	Non shelf-stable or shelf-stable containing meat products (except gelatine, collagen and highly refined products	The new certificate (2)	Yes	A certificate was required before 21st April 2021	The old certificate (1) shall be accepted until 20th October 2021, provided it was signed for before 21st August. The new certificate (2) is accepted.
Non shelf-stable containing any quantity of milk	Yes (1)	Non shelf-stable	The new certificate (2)	Yes	A certificate was required before 21st April 2021	The old certificate (1) shall be accepted until 20th October 2021, provided it was signed for before 21st August. The new certificate (2) is accepted.
Without meat and containing less than 50% of processed product of animal origin (4)	No	Non shelf-stable	The new certificate (2)	No	No certificate was required before 21st April 2021	Only the new certificate (2) is accepted to accompany the composite products
	No	Shelf-stable but not containing meat products (except gelatine, collagen and highly refined products	The new private attestation (3)	No	No certificate was required before 21st April 2021	Only the new private attestation (3) is accepted to accompany the composite products

(1) As established by Commission Regulation (EU) No 28/2012 of 11 January 2012 laying down requirements for the certification for imports into and transit through the Union of certain composite products and amending Decision 2007/275/EC and Regulation (EC) No 1162/2009 (OJ L 12, 14.1.2012, p. 1-13)

(2) Model animal health/official certificate for the entry into the Union of not shelf-stable composite products and shelf-stable composite products, containing any quantity of meat products, except gelatine, collagen and highly refined products, and intended for human consumption (Model COMP), as established in Chapter 50 of Annex III of Regulation (EU) 2020/2235

(3) Model private attestation by the operator entering shelf-stable composite products into the Union in accordance with Article 14 of Regulation (EU) 2019/625, as established in Annex V of Regulation (EU) 2020/2235

(4) Excluding non-shelf-stable composite products containing any quantity of milk

# Your key action points

- Ensure all your colleagues in supply chain and customs roles are aware of the change
- Attestations must be signed by the Importer or your Broker
- Engage with your local import health authority and clarify what this means regarding your import requirements?
- Speak to and obtain feedback from your BCPs - how they will apply controls for attestations?
- Formal guidance will be issued by EU by end of month. [Link to full regulation here.](#)
- Prepare yourself for worst-case scenario as there is not much time.
- This is an EU regulation change. UK will continue to apply the current rules.
- IMPORTANT NOTE: This applies to all your 3rd country supplying markets – i.e. not just the UK.

# Potential Issues

What are the potential issues?

- General concerns that national customs are not prepared enough to deal with this new regulation. With Brexit, national customs officers are already dealing with a surge of imports of products with animal ingredients from outside the EU. We noticed that in many instances they were not properly informed and therefore requested the wrong documents. This led to delays and blockage. This might be even worse with the new regulation.
- The need to provide a private attestation for composite products exempted from border controls: while exempted products don't need to be accompanied by a certificate currently, they will need in future to be accompanied by the private attestation model. Although it's a self-declaration attestation, the level of details required is quite high (we might need to obtain information from suppliers).
- An evolving list of composite products: the list of composite products exempted from border controls (in annex) is not containing all the products that were exempted in the past. Despite meeting the conditions, these products (because they are not listed) might be subject to border controls until the Commission updates the list (which takes several months). It is unclear how these products will be treated until then (which documents will be required).







# Frequently Asked Questions

## **What is the difference between a non shelf-stable and a shelf-stable composite product?**

A non shelf-stable composite product needs to be transported or stored under controlled temperature. It is not the case for shelf-stable composite products which can be kept at ambient temperature.

## **What percentage of a processed product of animal origin makes a food subject to the rules applicable to composite products?**

What makes foodstuff subject to the rules applicable to the composite products is the fact that it is made by both products of vegetable origin and processed products of animal origin. The percentage of processed product of animal origin included in the composite product is irrelevant

## **What is the main change to the rules applicable to the import of composite products into the EU from 21 April 2021 onwards?**

Import requirements are no longer based on the percentage of the processed products of animal origin in the composite product but rather on the animal health or public health risk linked to those ingredients of animal origin and on the need to tra

**VIEW A FULL LIST OF QUESTIONS AND ANSWERS [HERE](#).**

# Still have questions? Ask our experts.

We have a dedicated Customs Solutions team who are available to answer any of your questions around Composite Products and more. Get in touch now for tailored support that matches your business requirements.

**[hello@unsworth.uk](mailto:hello@unsworth.uk)**



**JAMES HERBERT**  
**Customs Solutions Advisor**



**CHARLES HOGG**  
**Commercial Director**



**ANTONS GORDEJEVS**  
**Export Commercial Manager**