agriculture

Department:
Agriculture
REPUBLIC OF SOUTH AFRICA

Notice No. VPN/57/2024-11

SUBJECT: EXPORT OF SHELF-STABLE COMPOSITE PRODUCTS THAT DO NOT CONTAIN MEAT PRODUCTS TO THE EUROPEAN UNION (EU) – PROCEDURES TO BE TAKEN TO CONFIRM EXPORT COMPLIANCE OF COMPOSITE EDIBLE PRODUCTS THAT ARE MANUFACTURED USING PROCESSED PRODUCTS OF ANIMAL ORIGIN EXCLUDING MEAT AND MEAT PRODUCTS.

INDEX

THIS VETERINARY PROCEDURAL NOTICE IS APPLICABLE WITH IMMEDIATE EFFECT.

Dr. Mphane Molefe.....
National Executive Officer (Meat Safety Act)
Date: 19/11/2024

Dr. M Maja.....
Director: Animal Health
Date: 26 November

1. DEFINITIONS

1.1 **Batch** – means a unit of production produced in a single plant using uniform production parameters such as the origin of the materials or a number of such units, when produced in continuous order in a single plant and stored together as a shipping unit.

1.2 **Composite edible product** – A foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin and includes those where the processing of primary product is an integral part of the production of the final product.

1.3 **Food for human consumption** – means any substance or product whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans.

1.4 **Fully EU Compliant system** – a system where an establishment that is approved to export composite food products to the EU and where all the products of animal origin used for food manufacturing in the establishment are derived only from EU member countries or EU approved third countries with approved EU chemical residue plans for that particular product of animal origin.

1.5 **Product of animal origin** – This refers to the primary product of animal origin used in the manufacturing of a composite edible/food product to form an integral part of the production and final product. For the purposes of this VPN the product of animal origin, such as milk or egg powder, must be processed.

1.6 **State Veterinarian** – A registered veterinarian employed by the government who has been authorized by the Competent Veterinary Authority to perform official functions.

2. PURPOSE OF THE VETERINARY PROCEDURAL NOTICE

2.1. The purpose of this Veterinary Procedural Notice (VPN) is to prescribe the procedures, checks and control measures that must be implemented and followed by:

- the food business operator (FBO),
- the official veterinarian that is responsible to confirm compliance of the composite food product exported to the EU,
- the provincial veterinary services, and
- the National Veterinary Services.

2.2. In order to render the necessary assurance to the EU pertaining to approval to export composite food products in terms of Article 6 of Commission Delegated Regulation 2022/2292.

3. BACKGROUND

3.1 A composite product is a food containing both processed products of animal origin and products of plant origin.

3.2 The European Union (EU) has legislation to control pharmacologically active substances, pesticide and contaminant residues in food for human consumption. This is governed by regulation (EU) 2017/625, Article 19 thereof and any delegated regulations that may be adopted according to Article 144 to supplement that regulation, in particular, Regulation (EU) 2022/2292.

3.3 In order to export food for human consumption to the EU, a non-member state ("third country") must have legislation in place to control residues in food for human consumption that is equivalent to Regulation (EU) 2017/625, in particular Article 19thereof and Regulation (EU) 2022/2292.

3.4 To prove equivalence, a third country must submit a residue control plan that is approved by the EU. National Chemical Residue Control Plans (NCRCP) must be submitted to the EU on an annual basis. If the NCRCP is approved by the EU, the country is published on an official EU list of compliant countries (Annex 1 of Regulation (EU) 2021/405). A separate NCRCP must be submitted by the third country and approved by the EU for each individual animal product e.g., red meat, poultry meat, dairy products, honey, hens eggs, etc., that is contained in the composite product. If a third country does not have an approved EU residue plan for a specific individual animal product, any composite food that includes the specific animal product as part of its composition, irrespective of the volume, may not be exported to the EU.

3.5 In terms of Article 8 of Commission Delegated Regulation (EU) 2022/2292) and Article 2(a), par.4 of Reg. (EU) 2021/405, a derogation is possible, provided that the animal products used to manufacture the composite food product are sourced from either EU member countries or third countries with approved residue plans for the particular individual animal products. In the case of third countries, this means that the third country where the animal product originates from must be listed in Commission Implementing Regulation (EU) 2021/405, with EU approval for that particular product. The same articles referenced above indicates the process to be followed to gain EU approval to make use of this derogation.

3.6 For the veterinary authority of a third country to render the necessary assurances to the EU in terms of the above derogation, it is essential that certain procedures, checks and control measures be put in place in order to confirm compliance of any food product exported to the EU in terms of said derogation.

3.7 Article 3 of Delegated Regulation (EU) 2021/630 however grants a derogation from border controls of certain composite products on condition that:

- It contains no meat products other than gelatine, collagen or highly refined products as referred to in Section XVI of Annex III to regulation (EC) No 853/2004;
- Any dairy, or egg product contained in the composite product may only be derived from a country listed in Annexes XVII, XVIII and XIX of Regulation (EU) 2021/404 and must have been treated in accordance with Article 163(1) of Regulation (EU) 2020/692;
- The final composite product is shelf-stable at ambient temperatures;
- It is clearly identified as being for human consumption; Are securely packaged or sealed
- It is labelled in an official language of the member state and the consignment is accompanied by a private attestation provided by the importing food business operator in accordance with the model laid down in Annex V of Regulation (EU) 2020/2235 (as amended).

3.8 The export certification required for the export of composite food products to the EU is described in Delegated Regulation (EU) 2022/2292 and in particular Articles 21 and 22 thereof. The model health certificate for not shelf-stable composite products can be found in Chapter 50 of Annex III of Commission Regulation 2020/2235 (as amended).

3.9 Over and above the compliance with the EU residue controls a product of animal origin used in the manufacturing of a composite food product must also originate from a country that complies fully to export to the EU in terms of animal health and public health requirements and the animal product must also be sourced from food establishments approved and listed by the EU for direct importation into the EU. To this extent it is necessary for any such product of animal origin (See 'product of animal origin' in definitions) to be imported into South Africa with an original, fully completed and compliant prescribed/relevant EU export certificate (for that particular food product), the same as is prescribed in terms of the EU legislation to accompany the products for introduction into the EU directly. This certificate must be issued in addition to the import certificate required to be completed for importation into South Africa. (Refer to detailed requirements and terms in paragraph 5.4 hereunder).

4. SCOPE OF THE VETERINARY PROCEDURAL NOTICE

4.1 This VPN is applicable to all FBOs intending to export ambient shelf-stable composite food products which contain processed products of animal origin, excluding meat and meat products, for which South Africa does not have an approved EU NRCP.

5. OBLIGATIONS OF FOOD BUSINESS OPERATORS

5.1 The Food Business Operator (FBO) must apply to the provincial veterinary services to request an audit for approval in terms of this VPN. The application form in Annex I must be used for this purpose.

5.2 Where the FBO plans to import products of animal origin directly into South Africa, it is the responsibility of the FBO to apply for an import permit from DALRRD, to import any products of animal origin that will be used in the manufacture of a composite food product that will be exported to the EU.

5.3 Only products of animal origin that originate from EU countries or from third countries that are approved in terms of the latest amended list published by the EU in Annex 1 of Regulation (EU) 2021/405 in terms of Commission Implementing Regulation (EU) 2022/2293 for that specific animal product are permissible to be used in the manufacturing of a composite food product to be exported to the EU from South Africa, as final product. Products of animal origin produced in countries other than the EU, must have been produced in an established approved and listed by the EU. It is not possible to use dairy products from countries other than the EU in composite products that are not shelf-stable as South Africa is not listed in Part 1 of Annex XVII of Regulation (EU) 2021/404

5.4 The products of animal origin that are imported as such must be accompanied by an original EU veterinary health certificate, which is:

- issued by the veterinary authorities in the country of origin,
- identifying the consignment in terms of traceability (e.g. Batch numbers) and linking it to the certificate,
- certifying the type of product,
- indicating the origin of the product (only from an EU approved establishment, approved in accordance with Article 126 of Regulation (EU) 625 of 2017), or
- from countries listed by the EU to export that particular product directly to the EU (Use of EU prescribed/relevant certificate only) and the product must comply with the EU requirements in terms of chemical residues as entailed in Regulation (EU) 2017/625, in particular Articles 19&150 thereof and any delegated regulations that may be adopted according to Article 144 to supplement that regulation
  The particular country must be listed in Regulations 2021/404 and 2021/405 for that specific product of animal origin. South Africa must have the listing marked with an "O" for the specific product of animal origin to be used in the composite product.

5.5 The FBO must keep a detailed list of potential food products that will be exported to the EU. This list must be kept on the approved electronic system and each potential product must be approved for the EU by the

state veterinarian that performs the annual audit of the establishment. The list must include the following information:

- Product name
- Product code where applicable
- Size of retail units
- List of all the products of animal origin that is used in the manufacture of the composite food product

5.6 It is the responsibility of the FBO to ensure and prove to the state veterinarian that the products of animal origin had not come into contact with any other animal products of a lesser standard. For this purpose, impervious packing material and/or storage separated by space (clearly demarcated) will be regarded as sufficient.

5.7 In the case of temperature controlled products of animal origin, it is the responsibility of the FBO to ensure that the product arrives at the manufacturing establishment at the prescribed storage temperature and that records of temperature checks are kept and readily available for auditors or when requested .

5.8 The FBO must inform the state veterinarian responsible for checks at the manufacturing establishment of any EU approved products of animal origin that arrives at the establishment. Annual audits must be performed to verify the consignments that arrive at the establishment. Where temperature controlled product is received the notification to the State Veterinarian will be such that the official will have an opportunity to be present when the product is off-loaded and when the temperature checks are performed and recorded by the FBO.

5.9 All EU compliant products of animal origin that are received at the manufacturing establishment must be recorded in a traceability register that has the same outcomes and intention of Annex II.

5.10 Once received the FBO must clearly identify any EU compliant products of animal origin that are intended to be used in the manufacture of final composite food products that will be eligible for export to the EU. Over and above the batch traceability identification (that links the product to the corresponding health certificate issued at place of origin), the EU compliant product of animal origin must be clearly identified as such, so as to preclude the inadvertent use of non-EU approved products of animal origin in a final food product that is eligible for export to the EU.

5.11 The FBO must ensure, by providing appropriate procedures, checks and records, that there is no possibility of cross contamination during manufacture of EU compliant composite food products, from products of a lesser standard. This may occur where the same production line or equipment is used for manufacture of EU compliant food products immediately after the manufacture of products that are not compliant to

be exported to the EU, without proper cleaning and disinfection in between.

5.12 The FBO must keep manufacturing and traceability logs for each batch of EU compliant composite food product manufactured at the establishment. This is done by recoding the manufacture of the products on the electronic system. Records kept for this purpose must comply with the outcomes and intention of Annex III.

5.13 Whenever a consignment of composite food products requiring a veterinary health certificate is ready for export to the EU the FBO must apply to the state veterinarian to verify and sign off Annex III. Application must be made timely to ensure the availability of the official. For any export of a composite product an inspection application must be submitted.

5.14 Over and above the specific, detailed controls listed in Par 5.1 to 5.13 above, the FBO will also ensure that the following Food Safety Management System requirements are implemented and maintained at the manufacturing establishment:

- Valid certificate of acceptability issued in terms of the Foodstuffs, Cosmetic and Disinfection Act (Act no. 54 of1972 as amended)
- HACCP (developed in-house or certified by an external party)
- HACCP can form part of an overall Food Safety Management System e.g. FSSC 22 000
- Full product traceability (back traceability from final composite food product to the ingredients used in the manufacture thereof)
- Recall procedures (for any batches of composite food product that was distributed to the next point in the food chain)
- Written procedures to prevent cross contamination of EU compliant food products by products of a lesser standard, including pre-processing storage or preparation, processing, post processing and during storage of the final composite food product
- Cleaning and disinfection programmes
- Supplier quality assurance programmes

6. OBLIGATIONS OF THE PROVINCIAL VETERINARY SERVICES

6.1 The provincial veterinary services (PVS) will receive the application from the FBO to be audited for approval to export composite edible products (excluding meat and meat products) to the EU. (See Par. 5.1 above and Annex I).

6.2 The Provincial Executive Officer (PEO) will assign a state veterinarian to audit the manufacturing establishment and its control measures to ascertain if it complies with the prescriptions entailed in this VPN.

6.3 Where a compliant audit report is received from the state veterinarian, the PVS will recommend the manufacturing establishment to the National Veterinary Services (DALRRD), to be registered as an establishment that has all the necessary controls in place to export EU compliant composite edible products to the EU.

6.4 The PVS will be responsible to carry out an annual audit to confirm continued compliance of the FBO with the requirements of this VPN if an application to renew the registration is received from the FBO.

7. OBLIGATIONS OF THE STATE VETERINARIAN RESPONSIBLE FOR CONTROL AT THE MANUFACTURING ESTABLISHMENT

7.1 The state veterinarian responsible for official controls at the manufacturing establishment must verify the receipt of all EU compliant products of animal origin that arrives at the establishment (refer to par. 5.8 above).

7.2 The state veterinarian is responsible to verify and sign for the correct completion of the Annex II of this VPN.

7.3 The state veterinarian is responsible to verify the correct completion of Annex III of this VPN during annual audits and issue veterinary export certificates for consignments of composite products that are not shelf-stable.

7.4 If the state veterinarian finds that it is not possible to confirm that all the EU export products are manufactured by using only products of animal origin that is EU compliant in terms of par. 5.3, he or she will not sign the Traceability Register (Annex III of this VPN). Signing of the register will only resume after the necessary corrective actions have been carried out by the FBO and confirmed by the state veterinarian.

7.5 It is the responsibility of the state veterinarian to inform the PEO if the FBO no longer complies with the requirements of this VPN, in which case the PEO will immediately order the withdrawal of the registration certificate that was issued by the National Veterinary Services (refer par. 8.2). The PEO will notify the National Veterinary Services of the withdrawal immediately.

8. OBLIGATIONS OF THE NATIONAL VETERINARY SERVICES

8.1 The National Veterinary Services (NVS) will receive the audit report (Annex IV) and recommendation from the PVS (Refer Par. 7.3).

8.2 In case of compliance with the standards and requirements of this VPN the NVS will issue a registration certificate to the FBO to confirm compliance and approval to export composite food products to the EU.

8.3 The registration certificate will be valid for one year, which will require annual application for renewal by the FBO.

8.4 In case of non-compliance of the FBO with the standards and requirements of this VPN the NVS will withdraw the registration contemplated in Par 8.2.

8.5 The NVS will include in the annual National Residue Control Programme (NRCP) to the EU, a request to list South Africa in terms of article 1 of Commission Implementing Regulation (EU) 2022/2293 and article 8 of Commission Delegated Regulation (EU) 2022/2292 for all the products of animal origin that is used for manufacturing of composite food products in South Africa, but for which products South Africa has no EU approved NRCP.

9. REFERENCES

The following had been considered in compiling this VPN:

9.1 Regulation (EU) 2021/405 on the approval of plans submitted by third countries in accordance with Regulation (EU) 2017/625, in particular Article 19 thereof and any delegated regulations that may be adopted according to Article 144 to supplement that regulation.

9.2 Regulation (EU) 2022/1644 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council with specific requirements for the performance of official controls on the use of pharmacologically active substances authorised as veterinary medicinal products or as feed additives and of prohibited or unauthorised pharmacologically active substances and residues thereof.

9.3 Regulation (EU) 2022/1646 on uniform practical arrangements for the performance of official controls as regards the use of pharmacologically active substances authorised as veterinary medicinal products or as feed additives and of prohibited or unauthorised pharmacologically active substances and residues thereof, on specific content of multi-annual national control plans and specific arrangements for their preparation

9.4 Regulation (EC) No 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, in particular Article 2.

9.5 Regulations (EC) 852/2004, 853/2004, 396/2005, 1881/2006 repealed by 2023/915.

9.6 Regulation (EU) 2017/625 laying down specific rules for the organization of official control on products of animal origin intended for human consumption, in particular Article 126.

9.7 Regulation (EU) 2021/630 and 2021/632 concerning lists of animals and products to be subject to controls at border control posts.

9.8 Regulations (EU) 2020/692 and in particular Articles 162 & 163 thereof and Regulation (EU) 2020/2235 laying down requirements for the certification for imports into and in transit through the Union, of composite products.

9.9 Regulation (EU) 2020/692, laying down animal and public health and veterinary certification conditions for the introduction into the European Union of raw milk, dairy products, colostrum and colostrum based products intended for human consumption and Regulation (EU) 2021/404 in particular Annexes XVII and XVII, that list countries from where dairy products may be imported to be used as primary ingredient for the manufacturing of a composite food product destined to be exported to the EU.

ANNEX I: APPLICATION FORM FOR APPROVAL OF A FOOD ESTABLISHMENT TO EXPORT AMBIENT SHELF-STABLE COMPOSITE FOOD PRODUCTS WHICH CONTAIN PROCESSED PRODUCTS OF ANIMAL ORIGIN, EXCLUDING MEAT AND MEAT PRODUCTS, TO THE EUROPEAN UNION

APPLICATION FORM FOR APPROVAL OF A FOOD ESTABLISHMENT TO EXPORT AMBIENT SHELF-STABLE COMPOSITE FOOD PRODUCTS		
1.	Name of Food Business Operator	
2.	Physical address of food manufacturing establishment	
3.	GPS co-ordinates of food manufacturing establishment	
4.	Telephone number	
5.	E-mail address	
6.	Mail address	
7.	Name of the owner or manager responsible for the implementation of the VPN at the food manufacturing establishment	
8.	List of products imported from EU member states or third country with EU approved NCRP.	1.
		2.
		3.
		4.
9.	List of products (In broad different product groups) to be exported to the European Union (EU)	1.
		2.
		3.
		4.

A: DECLARATION BY OWNER/MANAGER OF THE FACILITY

I, _____, (Name of the owner or manager responsible for the implementation of the VPN at the food manufacturing establishment) hereby apply to be audited and registered to export composite edible products without any meat products to the European Union.

To this extent, I undertake to:

1. Comply fully to the requirements of this VPN at all times;
2. To grant full access to the official auditors and state veterinarians in the carrying out of their duties to ensure that that the requirements of this VPN are met at all times;
3. To export to the European Union only products that have been manufactured from products of animal origin that were fully compliant with the European Union regulations, in particular those regulations pertaining to animal health, public health and residue controls; and
4. To maintain the necessary and prescribed records to be able at all times to prove the undertaking in point 3 above.

_____ _____
Signature of the Owner/Manager Date

B: DECLARATION BY STATE VETERINARIAN OF THE AREA

I, _____*(Name)*
of _____*(Department)*
hereby certify that the necessary veterinary control will be provided in the district/municipality where the above-described FBO is located.

A comprehensive inspection report (**ANNEX IV**) is attached to this application and if this is a new registration, all supporting documents are provided.

The suggested date of re-registration is _____.
(If this date is not the same as the expiry date of the current registration, please supply supporting reasons)

_____

Name: _____ Official Signature

Designation _____
Address: _____
_____

Official stamp

Email address: _____

ANNEX II: RECEIVING REGISTER FOR EUROPEAN UNION COMPLIANT PRODUCTS OF ANIMAL ORIGIN

Complete one individual Receiving Register for each separate product of animal origin

Receiving Register reference	Date of receipt at the establishment	EU compliant product of animal origin description	Number of units received	Mass of units received	Traceability detail of individual units e.g. Batch numbers	Reference to original EU Certificate linked to the product via direct traceability e.g. batch numbers	Date used in manufacture of EU compliant final composite food product	Quantity and traceability numbers of products used e.g. Batch numbers produced on each date

A. COMPLETED BY THE OWNER/MANAGER OF THE FACILITY

_____ _____

Signature of the Owner/Manager Date

B. VERIFIED BY THE STATE VETERINARIAN

Name: _____ Official Signature

Designation: _____

Address: _____

_____

Official stamp

Email address: _____

ANNEX III: TRACEABILITY REGISTER FOR SHELF-STABLE COMPOSITE FOOD PRODUCTS, WHICH CONTAIN PROCESSED PRODUCTS OF ANIMAL ORIGIN EXCLUDING MEAT AND MEAT PRODUCTS,THAT ARE COMPLIANT TO BE EXPORTED TO THE EUROPEAN UNION

TRACEABILITY REGISTER FOR SHELF-STABLE COMPOSITE FOOD PRODUCTS THAT ARE COMPLIANT TO BE EXPORTED TO THE EUROPEAN UNION

Name of composite edible product prepared for export to the EU	Batch number(s)	Number of smallest retail units	Mass of product to be exported	List of EU compliant products of animal origin used in the manufacture of this composite product	Product of animal origin batch numbers	Receiving Register reference (Annex II)
				1.		

I, the state veterinarian, responsible for controls at the food establishment, ,(Name of FBO), hereby confirm that the above traceability information is correct and that the composite edible product(s) listed above is/are compliant with the VPN.

Signature Date

Official stamp

ANNEX IV: AUDIT PROCEDURE TO CONFIRM THE COMPLIANCE OF COMPOSITE FOOD PRODUCTS WITHOUT MEAT PRODUCTS TO BE EXPORTED TO THE EUROPEAN UNION

Audit of a composite food establishment, to confirm compliance to export to the European Union				
Details of the establishment				
1.	Name of establishment:			
2.	Registration number of establishment			
3.	Physical address			
4.	Telephone number			
5.	E-mail address			
6.	Postal address			
7.	Name/email address of the owner or manager responsible for the implementation of the VPN at the food manufacturing establishment			
8.	Name/email address of official veterinarian responsible to carry out official checks at the establishment			
9.	Date of the audit			
Audit findings				
Complete **sections A and B.**				
Section A (General requirements)				
	Audit criteria	**VPN reference**	**Com-pliant**	**Comments/Corrective actions required**
1.	A valid certificate of acceptability, issued in terms of the Foodstuffs, Cosmetic and Disinfection Act (Act no. 54 of 1972 as amended) is available at the establishment	5.14	Yes/No	
2.	A HACCP study and/or an internationally recognized food safety standard is implemented at the establishment	5.14	Yes/No	
3.	Full product traceability is implemented at the establishment Written procedures are available to explain product traceability	5.14	Yes/No Yes/No	

	A minimum of five traceability sample exercises were carried out with good outcome i.e. where a batch number of a composite food product is used to trace back to the manufacturing date and manufacturing records and where the batch numbers of the products of animal origin that were used in the manufacturing of the composite food batch are available and can be traced back to the Receiving Register and from there, finally, to the applicable Import Health Certificate		Yes/No Yes/No Yes/No Yes/No	Non-compliance regarding this audit criteria necessitates immediate suspension of the registration of the establishment to export composite products to the EU
4.	Recall procedures	5.14	Yes/No	
5.	Cleaning programme	5.14	Yes/No	
6.	Supplier Quality Assurance Programme	5.14	Yes/No	
7.	Review of the export certificates that were received with the products as listed (Annex II) and on file: • All certificates on file have been recorded in the Receiving Register (Annex II) • Only original Import Health Certificates are obtained, in correct format and on file • Products of animal origin originate only from EU approved establishments • Products of animal origin () originate only from EU countries or third countries listed by the EU in terms of the latest version of Annex 1 of Regulation 2021/405 FOR THAT SPECIFIC ANIMAL PRODUCT • Products of animal origin comes from a country listed in Regulation 2021/404 (shelf-stable composite products only) • Products of animal origin originate only from EU countries (non shelf-stable composite products only)	5.4	 Yes/No Yes/No Yes/No Yes/No Yes/No Yes/No	 Non-compliance constitutes a critical finding Non-compliance constitutes a critical finding Non-compliance constitutes a critical finding Non-compliance constitutes a critical finding Non-compliance constitutes a critical finding
8.	A complete list of composite	5.5	Yes/No	

	products that are, or may be, exported to the EU is provided i.e. there are no composite products recorded in the Traceability Register (Annex III) that are not included in the master list of products for export to the EU. The list of composite food products contains the required details as per par. 5.5		 Yes/No	
9.	Receiving records confirm that any temperature controlled products of animal origin arrived at the establishment at the correct temperature	5.7	Yes/No	
10.	All products of animal origin (EU Compliant) that arrives at the establishment are recorded in the Receiving Register (Annex II), all batches of products of animal origin kept in storage at the establishment can be traced back to one of the imported consignments recorded in the Receiving Register and any final product can be traced back to one of the imported consignments recorded in the Receiving Register	5.9	Yes/No Yes/No Yes/No	
11.	A Traceability Register (Annex III) is kept at the establishment All composite food products exported to the EU is recorded in the Traceability Register The Traceability Register is verified and signed off by the State Veterinarian	5.12 5.13 7.3	Yes/No Yes/No Yes/No	Non-compliance regarding this audit criteria necessitates immediate suspension of the registration of the establishment to export composite products to the EU

12.	All composite food products exported to the EU complies with the requirements of Article 3 of Commission Regulation (EU) 2021/630, in particular: • It contains no meat products other than gelatine, collagen or highly refined products as referred to in Section XVI of Annex III to regulation (EC) No 853/2004 • Any milk or egg product contained in the composite product may only be derived from a country listed in Annexes XVII, XVIII and XIX of Regulation (EU) 2021/404 • The final composite product is shelf-stable at ambient temperatures. • It is clearly identified as being for human consumption, • Are securely packaged or sealed, It is labelled in an official language of the member state.	3.7	Yes/No Yes/No Yes/No Yes/No Yes/No	Non-compliance regarding any detail of this audit criteria necessitates immediate suspension of the registration of the establishment to export composite products to the EU

Section B

	Audit criteria	VPN reference	Com-pliant	Comments/Corrective actions required
1.	Inspection of the establishment confirmed that there are no products of animal origin anywhere in the establishment that have not been imported from EU compliant establishments	5.6	Yes/No	Non-compliance regarding this audit criteria necessitates immediate suspension of the registration of the establishment to export composite products to the EU

Summary of audit findings

List of corrective actions to be completed/due dates:

Audit recommendation
The establishment, detailed above, conforms to the VPN requirements for export of composite food products without any meat products, to the EU and is therefore recommended for registration/re-registration in terms of this VPN. **Name of auditor:** **Designation:** **Official stamp** **Signature:** **Date:**

ANNEX V: MODEL PRIVATE ATTESTATION BY THE OPERATOR ENTERING SHELF-STABLE COMPOSITE PRODUCTS INTO THE UNION IN ACCORDANCE WITH ARTICLE 14 OF DELEGATED REGULATION (EU) 2019/625 WITH A DELEGATED REGULATION (EU) 2019/625 (ATTACHED)