

## **APHIS VS List of Low Risk and Exempted Animal Origin Ingredients and Products**

**Introduction:** Use this list as a guide for commodities or animal ingredients that do not require an APHIS Veterinary Services (VS) import permit but can enter the United States utilizing specific documentation, as required by APHIS VS. These documents must clearly correspond to the incoming shipment by means of an invoice number, or shipping marks or lot number or other identification method. All applicable APHIS VS requirements for all animal origin ingredients must be met. All documents submitted with each shipment should either be in English or include an English translation.

- ❖ If you have a product consisting of multiple animal origin materials listed in Sections A and B below, you may import the product without an APHIS VS import permit provided each shipment is accompanied by the appropriate combination of documents and certificates.
  - Products with multiple animal origin ingredients may require an APHIS VS import permit if the appropriate documentation cannot be obtained.

**\*\*\*[EMAIL US](#) or contact us at 301 851 3300, option 1 with questions regarding the importation of animal products into the United States.**

Sections in this document:

- A. [APHIS Guidelines for Importation](#) (read section A before looking at sections B, C, D)
- B. [Commodities NOT Requiring Government Certification](#)
- C. [Commodities Requiring Government Certification](#)
- D. [Guidance on Required Certifications](#)

### **A. APHIS Import Guidelines are available [HERE](#)**

- Please ensure the commodity you wish to import is not addressed by these guidelines before proceeding to review sections B, C, and D.
- These guidelines describe some commodities that do not require a VS import permit as part of the conditions of entry.
- Certain commodities covered by these guidelines require government certification, but others may require a manufacturer's/producer's statement.
- Please ensure your commodity meets all the requirements of the guideline prior to importation.

## **B. Commodities NOT Requiring Government Certification**

The following products do not require government certification or VS import permit as part of the APHIS VS conditions of entry and can be imported as unrestricted products. Such products are still subject to inspection by US Customs and Border Protection (CBP) and must be accompanied by an official certificate of origin, bill of lading, invoice, label OR document on official letterhead prepared by the manufacturer, shipper, OR seller confirming: material type, species of origin, intended use (when required), and country of origin (when required).

\*Note: this list does not include those commodities addressed by the Guidelines in A above.

### B1. Rabbit/hare, kangaroo, rhino, elephant, bear, and/or rodent material, EXCEPT:

- rendered meals, digests, hydrolyzed proteins, and similar materials
- rabbit/hare or rodent serum shipments greater than 1 Liter
  - APHIS import guideline #1103 addresses research material from laboratory animals ([see the link in A above](#)).
- materials derived from animals that have been inoculated with, or exposed to, any exotic livestock or poultry disease agents, OR originate from facilities where work with exotic disease agents affecting livestock or avian species is conducted

### B2. Gelatin for Industrial Use (Not for animal or human consumption)

- Technical gelatin or animal glue
- Photographic Film

\*note: You may wish to include documentation declaring the intended use.

### B3. Inedible Avian schmaltz and schmaltz derivatives (Avian fats)

### B4. Gut strings for instruments and racquets, finished suture material derived from intestines and packed in liquid

### B5. Certain products for human consumption containing milk or milk products as the only animal origin ingredient:

\*Commodities not listed here may qualify for importation under [C1](#)

- Butter and butter oil (exempted by regulation-[9 CFR 94.16](#))
- Solid cheese (hard/soft) and pasteurized processed cheese [not including cheese with liquid and not including cheese containing meat] (exempted by regulation-[9 CFR 94.16](#))
- Milk/milk products originating and exported from Canada (will require proof of origin of the animal product)
- Fully finished food products containing milk/milk product and animal-origin vitamins or gelatin that meet the requirements of APHIS import guideline #1122 ([see the link in A above](#)).
- Dry milk as a fixative/binder.

(continued) B5. Certain products for human consumption containing milk or milk products as the only animal origin ingredient:

- Shelf stable concentrated liquid milk product (containing no sugar) in commercially labeled, hermetically sealed containers meeting the requirements of [9 CFR 94.16 \(b\)\(1\)](#)
- Cultured milk products, including dried forms (such as but not limited to yogurt, kefir, and sour cream, etc.)
- Formulations containing dry milk products as the only animal origin ingredient, commercially labeled and presented in final finished packaging requiring no further manipulation of the product (includes all products that contain dry milk powder or dry milk products to include the following as a partial, not all-inclusive list: baking mixes, cocoa mixes, drink mixes, etc.)
- Alcoholic beverages containing milk (e.g., chocolate liquor)

B6. Certain products for animal consumption containing milk or milk products as the only animal origin ingredient:

\*Commodities not listed here may qualify for importation under [C1](#)

- Butter and butter oil (exempted by regulation-[9 CFR 94.16](#))
- Solid cheese (hard/soft) and pasteurized processed cheese [not including cheese with liquid and not including cheese containing meat] (exempted by regulation-[9 CFR 94.16](#))
- Milk/milk products originating and exported from Canada (will require proof of origin of the milk ingredient)

B7. Certain egg products for human consumption:

- Fully baked goods (excluding moon cakes) including the following as a partial, not all-inclusive list: Candy or confectioneries containing milk/milk products and/or egg/egg products and/or vitamin A and/or vitamin D3 ingredients; drink mixes; mayonnaise; dry plain pasta; dry plain noodles; salad dressing; sauces containing eggs; pancake mixes; bread mixes; cake mixes; and shelf-stable products with egg ingredients for human consumption in commercially labeled, hermetically sealed containers.
- Alcoholic beverages containing milk and/or egg (e.g., eggnog, chocolate liquor)

B8. Certain Tallow or Tallow Derivatives:

- Edible tallow listed as an ingredient in a food product ready for human consumption (such as margarine and candies) and food products cooked in tallow (such as French fries and hash browns)
- Products containing bovine tallow derivatives as the only animal origin material (excludes bulk bovine tallow derivatives)
- Ovine tallow derivatives in bulk or in products as the only animal origin material

Quick Links: [APHIS Guidelines for Importation, Commodities NOT Requiring Government Certification, Commodities Requiring Government Certification, Guidance on Required Certifications](#)

#### B9. Certain Trophy/Museum Specimens

- Bones, horns and hoofs for trophies or for consignment to museums as long as the commodities are found to be free from undried pieces of hide, flesh, and sinew when inspected at entry. (subject to inspection at the port of arrival)
- Fully taxidermy-finished trophies (subject to inspection at the port of arrival)
- Unfinished trophies from disease affected regions may be imported without a VS import permit if consigned directly to a USDA Approved Establishment. To learn more about utilizing a USDA Approved Establishment, please visit <https://www.aphis.usda.gov/animalhealth/approvedestablishments>

Note: Trophies are bones (including skulls, antlers, teeth, horns, and hoofs) of an animal carcass that can be used as a remembrance or souvenir of “the hunt,” and are **for personal use only (not for sale/distribution)**;

#### B10. Certain hides/skins and products from hides/skins

- Untanned ruminant hides and skins that are hard dried (flint-dried) skins as verified by inspection at entry (exempted by regulation [9 CFR 95.16](#))
- Porcine flint-dried hides from countries free of African swine fever (see list of affected regions [here](#))
- Leather
- Fully finished/taxidermy-finished hides/furs for display (such as rugs) (subject to inspection at the port of arrival)
- Hides/skins not meeting the requirements above may be imported without a VS import permit if consigned directly to a USDA Approved Establishment. To learn more about utilizing a USDA Approved Establishment, please visit <https://www.aphis.usda.gov/animalhealth/approvedestablishments>

B11. Fully finished manufactured products made with bones or horns (excluding animal consumption items). Examples include, but are not limited to, buttons, tools, weapons (knife handles, pistol grips), and souvenirs. Excludes bulk shipments of bones/horns.

B12. Fully finished manufactured products containing feathers (excluding animal consumption items). Examples: coats, comforters, crafts, and pillows. Does not include bulk feathers.

#### B13. Miscellaneous Products with Animal Origin Ingredients allowed unrestricted entry:

- Cosmetics in retail-ready, final packaging
- Egg protein shampoos
- products containing egg phospholipid, egg lecithin, and/or fish oil/fish oil derivatives
- Food products (e.g., candy, drinks with gelatin, gelatin desserts [Royal and Jell-o], jams, jellies, marshmallows, pudding, and sherbet), that are for human consumption and contain gelatin as the **only** animal-derived material
- Inedible lard and inedible lard derivatives
- Gelatin based Gummy vitamins with or without vitamin D3

Quick Links: [APHIS Guidelines for Importation](#), [Commodities NOT Requiring Government Certification](#), [Commodities Requiring Government Certification](#), [Guidance on Required Certifications](#)

(continued) B13. Miscellaneous Products with Animal Origin Ingredients allowed unrestricted entry:

- Bone ash, bone black, or bone char from **other than** bovine, caprine, or ovine
- Beeswax, royal jelly, honey, or other bee products
  - Importations of LIVE or DEAD bees may be regulated by [APHIS Plant Protection and Quarantine](#)
- Rendered or processed animal proteins for human use are allowed entry without restriction when presented as an ingredient in a finished human food product ready for direct consumer sale. (excludes bulk shipments of processed animal proteins)
  - *Processed animal protein* means meat meal, bone meal, meat and bone meal, blood meal, dried plasma and other blood products, hydrolyzed proteins, hoof meal, horn meal, poultry meal, feather meal, fish meal, and any other similar products.

Quick Links: [APHIS Guidelines for Importation](#), [Commodities NOT Requiring Government Certification](#), [Commodities Requiring Government Certification](#), [Guidance on Required Certifications](#)

### **C. Commodities Requiring Government Certification**

The following is an abbreviated list of products for which APHIS VS import permits are commonly requested, but not required. These commodities can enter the United States utilizing an original government certificate endorsed by a full-time salaried veterinary officer from of the national government of the EXPORTING region that clearly corresponds to the applicable CFR regulation and the commodity. Certification must be an *original* document that is specific to the shipment or lot of certified material. An English translation of the certificate must be provided. Note: this list does not include those commodities addressed by the Guidelines in A above.

C1. Milk/Milk products, not listed in sections A or B above, sourced and processed in regions recognized by APHIS as [free of foot-and-mouth disease \(FMD\)](#).

Please [CLICK HERE](#) for detailed certification guidance for milk/milk products

C2. Animal-origin gelatin capsules EMPTY or containing:

- Lactose and lactose derivatives
- Vitamins A or D3 derived from animals
- Fish oil and any other aquatic species material (excluding Tubifex worms, bloodworms (Chironimid sp.), antivenom, hydrosylates, meals [e.g. fish meal], solubles.)
- Bovine tallow or tallow derivatives (e.g. mg stearate or stearic acid)
- Ovine tallow derivatives
- Bovine collagen
- Beeswax or royal jelly (please also contact [APHIS Plant Protection and Quarantine](#))

\*To import animal-origin gelatin capsules containing materials listed in sections A, B, or C, please obtain the appropriate combination of documents for the individual animal materials. For additional information on what documentation is required, please [CLICK HERE](#)

Quick Links: [APHIS Guidelines for Importation, Commodities NOT Requiring Government Certification, Commodities Requiring Government Certification, Guidance on Required Certifications](#)

#### **D. Guidance on Required Certifications:**

The following describes certifications for certain animal products. Please use this guidance to obtain an original government certificate endorsed by a full-time salaried veterinary officer from of the national government of the EXPORTING region.

- Quick links for certification requirements: [gelcaps +/- additional animal material](#), [bovine collagen](#), [bovine tallow](#), [bovine tallow derivatives](#), [bovine gelatin](#), [gelatin \(equine, caprine, ovine, porcine\)](#), [milk/milk products](#),
- Some sections of certification guidance below reference the APHIS-defined Bovine Spongiform Encephalopathy (BSE) risk status of certain countries.
  - Country disease status recognized by APHIS:  
<https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/animal-and-animal-product-import-information/animal-health-status-of-regions>
  - Countries or regions not listed as either negligible or controlled risk are recognized as undetermined risk.

#### **D1. Animal-origin gelatin capsules containing additional animal material**

- You will need to obtain the appropriate combination of certification and documentation for the individual animal origin ingredients.
  - Aquatic species material (including gelatin, fish oil) requires no certification. Please see APHIS import guideline #1104 ([see the link in A above](#))
  - Beeswax or royal jelly ingredients also do not require certification.
  - For those commodities not exempted by [B9 above](#), [pharmaceuticals/nutraceuticals](#) containing tallow derivatives (bovine/ovine) can be imported provided the documentation/certification for all the other animal materials are provided.
  - Certification is required for [bovine collagen](#), [bovine tallow](#), [bovine tallow derivatives](#)
  - Certification is required for gelatin: [bovine gelatin](#), [gelatin \(equine, caprine, ovine, porcine\)](#)
    - Lactose and lactose derivatives *alone* are allowed unrestricted entry ([see guideline #1107 in section A](#)); however, when included in a bovine/ovine/equine/porcine gelatin capsule, we recommend you obtain the required gelatin certification and include a statement in the certificate that identifies the lactose/lactose derivative.
  - Vitamins A or D3 derived from animals may require certification. Please see APHIS import guideline #1122 ([see the link in A above](#))

## D2. Collagen derived from bovine

APHIS Regulation **9CFR 95.7** codifies the importation of this material. You can access the text of this regulation at [https://www.ecfr.gov/cgi-bin/text-idx?SID=8f42d5ca1bf4c8c52dd2376c0850f6f8&mc=true&node=pt9.1.95&rgn=div5#se9.1.95\\_17](https://www.ecfr.gov/cgi-bin/text-idx?SID=8f42d5ca1bf4c8c52dd2376c0850f6f8&mc=true&node=pt9.1.95&rgn=div5#se9.1.95_17)

- a. [for bovine hide/skin derived collagen] Each shipment must be accompanied by an ORIGINAL certificate signed by a full-time, salaried veterinarian of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time, salaried veterinarian of the national government of the exporting region certifying that the collagen is derived from hides and skins of bovine animals, and that the collagen has not been commingled with materials ineligible for entry into the United States.
  
- b. [for bovine bone derived collagen] Each shipment is accompanied to the United States by an original certificate signed by a full-time salaried veterinary officer of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time salaried veterinary officer of the national government of the exporting region, representing that the veterinarian issuing the certificate was authorized to do so, stating that:
  - EITHER
  - The collagen is derived from the bones of bovine animals and originates in a region of negligible risk for BSE, and is exported from a region of [include as applicable- [negligible, controlled, or undetermined](#)] risk for BSE
  - OR
  - The collagen is derived from the bones of bovine animals and originates in a region of controlled risk or undetermined risk for BSE, is exported from a region of [include as applicable- [negligible, controlled, or undetermined](#)] risk for BSE, and meets the requirements of (a) through (d) below:
    - (a) The bones from which the collagen was derived were derived from bovines that passed ante-mortem and postmortem inspection
    - (b) The bones from which the collagen was derived did not include the skulls of bovines or the vertebral column of bovines 30 months of age or older
    - (c) The bones were subjected to a process that includes all of the following steps, or to a process at least as effective in reducing BSE infectivity:
      - (i) Degreasing;
      - (ii) Acid demineralization;
      - (iii) Acid or alkaline treatment;
      - (iv) Filtration; and **(continued on next page)**



(Continued from above)

- (v) Sterilization at 138 °C (280.4 °F) or greater for a minimum of 4 seconds; and
- (d) The collagen has not been commingled with materials ineligible for entry into the United States.

### D3. Tallow derived from bovines

APHIS Regulation **9CFR 95.8** codifies the importation of this material. You can access the text of this regulation at [https://www.ecfr.gov/cgi-bin/text-idx?SID=8710a93117caeb252b832f12d827286&mc=true&node=pt9.1.95&rgn=div5#se9.1.95\\_18](https://www.ecfr.gov/cgi-bin/text-idx?SID=8710a93117caeb252b832f12d827286&mc=true&node=pt9.1.95&rgn=div5#se9.1.95_18)

Each shipment is accompanied to the United States by an original certificate signed by a full-time salaried veterinary officer of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time salaried veterinary officer of the national government of the exporting region, representing that the veterinarian issuing the certificate was authorized to do so, stating that:

- a) The tallow is composed of a maximum level of insoluble impurities of 0.15 percent in weight; or
- b) The tallow originates from a region of negligible risk for BSE ([name the region](#)); or
- c) The tallow originates from a region of controlled risk for BSE ([name the region](#)), is derived from bovines that have passed ante-mortem and post-mortem inspections, and has not been prepared using SRMs as defined for regions of controlled risk for BSE in §92.1 of this subchapter.

SRMs from Controlled Risk Regions include the following: a) the distal ileum of the small intestine and the tonsils from bovines of any age, and b) brain, skull, eyes, trigeminal ganglia, spinal cord, dorsal root ganglia, and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) from bovines 30 months of age and older.

#### D4. Derivatives of tallow derived from bovines

APHIS Regulation **9CFR 95.9** codifies the importation of this material. You can access the text of this regulation at [https://www.ecfr.gov/cgi-bin/text-idx?SID=8710a93117caeb252b832f12d827286&mc=true&node=pt9.1.95&rgn=div5#se9.1.95\\_19](https://www.ecfr.gov/cgi-bin/text-idx?SID=8710a93117caeb252b832f12d827286&mc=true&node=pt9.1.95&rgn=div5#se9.1.95_19)

Each shipment is accompanied to the United States by an original certificate signed by a full-time salaried veterinary officer of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time salaried veterinary officer of the national government of the exporting region, representing that the veterinarian issuing the certificate was authorized to do so, stating that:

- a) The commodity meets the definition of tallow derivative in §95.1: any chemical obtained through initial hydrolysis, saponification, or transesterification of tallow; chemical conversion of material obtained by hydrolysis, saponification, or transesterification may be applied to obtain the desired product
- b) The derivative is from tallow composed of a maximum level of insoluble impurities of 0.15 percent in weight; or
- c) The derivative is from tallow that originates from a region of negligible risk for BSE. [\(name the region\)](#); or
- d) The derivative is from tallow that originates from a region of controlled risk for BSE (name the region), is derived from bovines that have passed ante-mortem and post-mortem inspections, and has not been prepared using SRMs as defined for regions of controlled risk for BSE in §92.1 of this subchapter.

SRMs from Controlled Risk Regions include the following: a) the distal ileum of the small intestine and the tonsils from bovines of any age, and b) brain, skull, eyes, trigeminal ganglia, spinal cord, dorsal root ganglia, and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) from bovines 30 months of age and older.

## D5. Bovine gelatin

APHIS Regulation **9CFR 94.23** codifies the importation of this material. You can access the text of this regulation at [http://www.ecfr.gov/cgi-bin/text-idx?SID=ae0adb38e185404ad152b90574da7c94&mc=true&node=se9.1.94\\_123&rgn=div8](http://www.ecfr.gov/cgi-bin/text-idx?SID=ae0adb38e185404ad152b90574da7c94&mc=true&node=se9.1.94_123&rgn=div8)

- a) [for bovine hide/skin derived gelatin] Each shipment must be accompanied by an ORIGINAL certificate signed by a full-time, salaried veterinarian of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time, salaried veterinarian of the national government of the exporting region certifying that the gelatin is derived from hides and skins of bovine animals, and that the gelatin has not been commingled with materials ineligible for entry into the United States.
- b) [for bovine bone derived gelatin] Each shipment must be accompanied by an ORIGINAL certificate signed by a full-time, salaried veterinarian of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time, salaried veterinarian of the national government of the exporting region certifying that:
- EITHER
- The gelatin is derived from the bones of bovines and originates in a [region of negligible risk for BSE](#), and is exported from a region of [include as applicable- [negligible, controlled, or undetermined](#)] risk for BSE; and the gelatin has not been commingled with materials ineligible for entry into the United States
- OR
- The gelatin is derived from the bones of bovines and originates in a region of [[controlled risk or undetermined risk](#)] for BSE, is exported from a region of [include as applicable- [negligible, controlled, or undetermined](#)] risk for BSE, and meets the requirements of (a) through (d) below:
- (a) The bones from which the gelatin was derived were derived from bovines that passed ante-mortem and postmortem inspection
- (b) The bones from which the gelatin was derived did not include the skulls of bovines or the vertebral column of bovines 30 months of age or older
- (c) The bones were subjected to a process that includes all of the following steps, or to a process at least as effective in reducing BSE infectivity:
- (i) Degreasing;
- (ii) Acid demineralization;
- (iii) Acid or alkaline treatment;
- (iv) Filtration; and **(continued on next page)**

Quick Links: [APHIS Guidelines for Importation, Commodities NOT Requiring Government Certification, Commodities Requiring Government Certification, Guidance on Required Certifications](#)

(Continued from above)

- (v) Sterilization at 138 °C (280.4 °F) or greater for a minimum of 4 seconds; and
- (d) The gelatin has not been commingled with materials ineligible for entry into the United States.

D6. Gelatin (caprine/equine/ovine/porcine):

APHIS Regulation **9CFR 94.26** codifies the importation of this material. You can access the text of this regulation at [https://www.ecfr.gov/cgi-bin/text-idx?SID=3d918c55a28346f12f2a7e89aa761e8e&mc=true&node=se9.1.94\\_126&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=3d918c55a28346f12f2a7e89aa761e8e&mc=true&node=se9.1.94_126&rgn=div8)

Each shipment must be accompanied by an ORIGINAL certificate signed by a full-time, salaried veterinarian of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time, salaried veterinarian of the national government of the exporting region stating the species of animal from which the gelatin was derived.

For ovine/caprine gelatin the certificate must also state that the gelatin was not derived from ovine and caprine that have been in any region listed in [9 CFR 94.24\(a\)](#)

D7. Milk/Milk products\_sourced and processed in regions recognized by APHIS as [free of foot-and-mouth disease \(FMD\)](#).

Each shipment must be accompanied by an ORIGINAL certificate signed by a full-time, salaried veterinarian of the national government of the exporting region, or issued by a veterinarian designated by the national government of the exporting region and endorsed by a full-time, salaried veterinarian of the national government of the exporting region certifying that: The milk/milk product was processed in [name of country], a region listed in 9 CFR § 94.1(a)(2) from milk produced in [name of country], a region listed in 9 CFR § 94.1(a)(2) as free from foot-and-mouth disease (FMD). The milk/ milk product has never been in any region in which FMD exists, except when moving under seal as described in [9 CFR § 94.16\(c\)](#).