

## Trade Samples

The European Union (EU) defines as “trade samples” as:

**animal by-products or derived products intended for particular studies or analyses authorized by the competent authority in accordance with Article 17(1) of Regulation (EC) No 1069/2009 with a view to carrying out a production process, including the processing of animal by-products or derived products, the development of feedingstuff, pet food or derived products, or the testing of machinery or equipment.**

The EU does not consider “display items” or “research and diagnostic samples” to be “trade samples.” For information, including definitions of “[Display Items](#)” and “[Research and Diagnostic Samples](#)” please go back and select the pertinent articles.

### **I. Requirements to export “trade samples” (as defined by the EU) for DISPATCH to the EU:**

1. The importer in the EU must contact the Ministry of Animal Health in the importing EU country and obtain from them an import permit to import the trade sample. The EU authority will explain to the importer their relevant obligations. While this import permit does not become part of the export certificate, it should accompany the shipment. [\*There is an exception regarding France explained below.]
2. After the importer has obtained this approval, the Regulation (EU) 142/2011 “CHAPTER 8 Health certificate For animal by-products to be used ~~for purposes outside the feed chain or for trade sample, intended for dispatch to or for transit through~~ the European Union” is required.
  - a. Unlike other Regulation (EU) 142/2011 certificates, this certificate (when used for trade samples) **does not require APHIS inspection and approval of the producer/exporter** in most cases. If the APHIS office has any reason to doubt the content of the certificate, inspection would still be required.
  - b. The certificate must be prepared as indicated on this website for “trade samples.”
  - c. In section I.11 of the certificate, **no** “approval number” is listed.
  - d. In section I.28, instead of the approval number of the manufacturing facility in the U.S., the approval number of the importing facility in the EU is listed. (This number should correspond with the number listed on the “special permission” granted by the Ministry of Animal Health in the importing EU country.)
  - e. The exporter submits a copy of the import permit\* (and English translation) to the APHIS office when they submit the draft certificate for

endorsement). Neither this copy nor the original import permit becomes part of the certificate endorsed by APHIS.

- f. A scan of the label for the material must also be submitted to the APHIS office with the draft certificate. The label may be a label from the outer most packaging of the consignment. It must contain the following exact wording: “TRADE SAMPLE NOT FOR HUMAN CONSUMPTION”.

## II. Requirements to export “trade samples” (as defined by the EU) for TRANSIT of the EU:

1. The person responsible for the material while it is in the EU (the individual who is listed in section I.6 of the certificate) should contact the Ministry of Animal Health in the importing EU country prior to shipment to ensure that the consignment will be allowed transit with the available documentation.
2. The importer in the country of final destination (outside of the EU) must obtain documentation (e.g. an import permit) from the pertinent ministry of the government of the importing country documenting that the material is being allowed import as a trade sample. While this documentation does not become part of the export certificate, it, and relevant translations, must accompany the shipment.
3. After the importer has obtained this approval, the Regulation (EU) 142/2011 “CHAPTER 8 Health certificate For animal by-products to be used ~~for purposes outside the feed chain or for trade sample, intended for dispatch to or for transit through the European Union~~” is required.
  - a. Unlike other Regulation (EU) 142/2011 certificates, this certificate (when used for trade samples) **does not require APHIS inspection and approval of the producer/exporter** in most cases as long as the certificate. If the APHIS office has any reason to doubt the content of the certificate, inspection may still be required.
  - b. Any certification required by the actual importing country (country of final destination) must also be included in the certificate- and may require APHIS verification by inspection (depending on the nature of the certifications).
  - c. The certificate must be prepared as indicated on this website for “trade samples.”
  - d. Section I.5 of the certificate, the name and address of the EU border inspection post through which the consignment is expected to leave the EU is listed (instead of the consignee of the shipment).
  - e. In section I.11 of the certificate, **no** “approval number” is listed.
  - f. In section I.28, **no** approval number is listed.
  - g. The exporter submits a copy of the import permission (and English translation) from the country of final destination to the APHIS office when they submit the draft certificate for endorsement. Neither this copy nor the

original import permit become part of the certificate endorsed by APHIS. However, this documentation must accompany the consignment along with the certificate.

- h. A scan of the label for the material must also be submitted to the APHIS office with the draft certificate. The label may be a label from the outer most packaging of the consignment. It must contain the following exact wording: “TRADE SAMPLE NOT FOR HUMAN CONSUMPTION”.

Note: The Chapter 8 certificate uses the terms “trade samples” and “products for the particular technological studies or analyses” interchangeably. This can cause some confusion, but EU authorities have verified the terms have the same meaning.

**\*Exception regarding France: France does not issue import permits for trade samples. In lieu of the import permit, the exporter should obtain from the French importer one of the following documents (and an English translation). The document should demonstrate that the facility is approved to handle materials similar to those being exported as trade samples (or specifically for testing of samples). The approval number of the importing facility in France should be taken from that document:**

- 1. Approval Notification**
- 2. Authorization Notification**
- 3. Prefect Ruling**

**One of these documents is provided to the facility by the French government when the facility is first approved, so the document may not be dated recently.**