## Significant variation of the

## "VETERINARY HEALTH CERTIFICATE FOR EXPORTATION OF PROCESSED PETFOOD OTHER THAN CANNED PETFOOD TO THE REPUBLIC OF TÜRKİYE" from the

## "Chapter 3(B) Health Certificate for processed petfood other than canned petfood, intended for dispatch to or for transit through the European Union"

APHIS has identified one major difference in these certificates.

**Issue for exporters of products produced using "*Ingredients heat-treated 90C* *or produced under alternative approval at supplier*" processing option**

In section II.3, the EU's certificate only gives 4 possible "line-outs". The second option is to leave all of the following text (for the EU either all of this text is left, or it is all lined-out):

*or* [was produced as regards ingredients of animal origin using exclusively products which had been:

(a) in the case of animal by-products or derived products from meat or meat products subjected to a heat treatment of at least 90 °C throughout its substance;

(b) in the case of milk and milk based products,

(i) if they are from third countries or parts of third countries listed in column B of Annex I to Commission Regulation (EU) No 605/2010[3] submitted to a pasteurisation treatment sufficient to produce a negative phosphatase test;

(ii) with a pH reduced to less than 6 from third countries or parts of third countries listed in column C of Annex I to Commission Regulation (EU) No 605/2010, first submitted to a pasteurisation treatment sufficient to produce a negative phosphatase test;

(iii) if they are from third countries or parts of third countries listed in column C of Annex I to Regulation (EU) No 605/2010, submitted to a sterilisation process or a double heat treatment where each treatment was sufficient to produce a negative phosphatase test on its own;

(iv) if they are from third countries or parts of third countries listed in column C of Annex I to Regulation (EU) No 605/2010, where there has been an outbreak of foot-and-mouth disease in the last 12 months or where vaccination against foot-and-mouth disease has been carried out in the last 12 months, submitted to

either

- a sterilisation process whereby an Fc value equal or greater than 3 is achieved

or

- an initial heat treatment with a heating effect at least equal to that achieved by a pasteurisation process of at least 72 °C for at least 15 seconds and sufficient to produce a negative reaction to a phosphatase test, followed by

either

- a second heat treatment with a heating effect at least equal to that achieved by the initial heat treatment, and which would be sufficient to produce a negative reaction to a phosphatase test, followed, in the case of dried milk, or dried milk-based products by a drying process

or

- an acidification process such that the pH has been maintained at less than 6 for at least one hour;

(c) in the case of gelatine, produced using a process that ensures that unprocessed Category 3 material is subjected to a treatment with acid or alkali, followed by one or more rinses with subsequent adjustment of the pH and subsequent, if necessary repeated, extraction by heat, followed by purification by means of filtration and sterilisation;

(d) in the case of hydrolysed protein produced using a production process involving appropriate measures to minimise contamination of raw Category 3 material, and, in the case of hydrolysed protein entirely or partly derived from ruminant hides and skins produced in a processing plant dedicated only to hydrolysed protein production, using only material with a molecular weight below 10000 Dalton and a process involving the preparation of raw Category 3 material by brining, liming and intensive washing followed by:

  (i) exposure of the material to a pH of more than 11 for more than three hours at a temperature of more than 80 °C and subsequently by heat treatment at more than 140 °C for 30 minutes at more than 3,6 bar; or

  (ii) exposure of the material to a pH of 1 to 2, followed by a pH of more than 11, followed by heat treatment at 140 °C for 30 minutes at 3 bar;

(e) in the case of egg products submitted to any of the processing methods 1 to 5 or 7, as referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011; or treated in accordance with Chapter II of Section X of Annex III to Regulation (EC) No 853/2004 of the European Parliament and of the Council[(4)];

(f) in the case of collagen submitted to a process ensuring that unprocessed Category 3 material is subjected to a treatment involving washing, pH adjustment using acid or alkali followed by one or more rinses, filtration and extrusion, the use of preservatives other than those permitted by Union legislation being prohibited;

(g) in the case of blood products, produced using any of the processing methods 1 to 5 or 7, as referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011;

(h) in the case of mammalian processed animal protein submitted to any of the processing methods 1 to 5 or 7 and, in the case of porcine blood, submitted to any of the processing methods 1 to 5 or 7 provided that in the case of method 7 a heat treatment throughout its substance at a minimum temperature of 80 °C has been applied;

(i) in the case of non-mammalian processed protein with the exclusion of fishmeal submitted to any of the processing methods 1 to 5 or 7 as referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011;

(j) in the case of fishmeal submitted to any of the processing methods or to a method and parameters which ensure that the products complies with the microbiological standards for derived products set out in Chapter I of Annex X to Regulation (EU) No 142/2011;

(k) in the case of rendered fat, including fish oils, submitted to any of the processing methods 1 to 5 or 7 (and method 6 in the case of fish oil) as referred to in Chapter III of Annex IV to Regulation (EU) No 142/2011 or produced in accordance with Chapter II of Section XII of Annex III to Regulation (EC) No 853/2004; rendered fats from ruminant animals must be purified in such a way that the maximum level of remaining total insoluble impurities does not excess 0,15 % in weight;

(l) in the case of dicalcium phosphate produced by a process that

  (i) ensures that all Category 3 bone-material is finely crushed and degreased with hot water and treated with dilute hydrochloric acid (at a minimum concentration of 4 % and a pH of less than 1,5) over a period of at least two days;

  (ii) following the procedure under (i), applies a treatment of the obtained phosphoric liquor with lime, resulting in a precipitate of dicalcium phosphate at pH 4 to 7; and

  (iii) finally, air dries the precipitate of dicalcium phosphate with inlet temperature of 65 °C to 325 °C and end temperature between 30 °C and 65 °C ;

(m) in the case of tricalcium phosphate produced by a process that ensures

  (i) that all Category 3 bone-material is finely crushed and degreased in counter-flow with hot water (bone chips less than 14 mm);

  (ii) continuous cooking with steam at 145 °C during 30 minutes at 4 bar;

  (iii) separation of the protein broth from the hydroxyapatite (tricalcium phosphate) by centrifugation; and

  (iv) granulation of the tricalcium phosphate after drying in a fluid bed with air at 200 °C ;

(n) in the case of flavouring innards, produced according to a treatment method and parameters, which ensure that the product complies with the microbiological standards referred to under point II.4.]

The Turkish version has significantly different text in section "(b)" (related to dairy ingredients) above, including a requirement, denoted by "(1)" for deletion of certain lines if they are not applicable.

Because of this, products produced using this method, denoted on the "Pet Food (Processed Pet Food Other than Canned) - Chapter 3(B)" EU page as "Ingredients heat-treated 90C or produced under alternative approval at supplier" would need to utilize different line-outs than are demonstrated on the "Pet Food (Processed Pet Food Other than Canned) - Chapter 3(B)" EU page. APHIS is developing guidelines for addressing these scenarios. Pending publication of those guidelines, exporters are encouraged to work closely with their local Veterinary Services service center on the preparation of these certificates.