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I. Introduction

This document provides guidance on selected items found in the European Union (EU) requirements page of the FSIS Export Library. To see the complete list of requirements, please visit the FSIS Export Library EU page. Wording in black is direct instruction from the FSIS Export Library. USMEF guidance is listed in red italics. This document does not contain every EU requirement, but is rather an interpretation aid for some of the requirements we frequently receive questions on. This is not a regulatory document, so as always, USMEF recommends that the exporter double check with FSIS and their importer on any questions or items of concern to minimize delays/retentions at the border.

For more information on the content of this document, please contact USMEF Export Services at 303-623-6328.

- EU Member States (MS)
  - Austria
  - Belgium
  - Bulgaria
  - Cyprus
  - Croatia
  - Czech Republic
  - Denmark
  - Estonia
  - Finland **Has additional requirements, see Finland/Sweden section.*
  - France
  - Germany
  - Greece
  - Hungary
  - Italy
  - Ireland
  - Latvia

- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden **Has additional requirements, see Finland/Sweden section.*

- Non-EU Member Countries that Follow EU or EU Member State Requirements
  - Guadeloupe
  - Iceland
  - Liechtenstein
  - Martinique
  - Monaco
  - Norway
  - Switzerland **Follows EU plant and process requirements, but allows beef from cattle administered hormonal growth implants.*
  - United Kingdom

II. Facility, Equipment, and Procedural Requirements

Non-Commingling at Facilities that Produce EU and Non-EU Member Country Product

- Animals whose meat is intended for export shall be kept separate from animals whose meat is not eligible for export.

Operators must show there is a reasonable method to prevent commingling of EU designated animals and non-EU animals. The facility must be able to show adequate control to keep the animals separate at all times during holding and procedures must be sufficient to show animals are kept separate during unloading and movement into the facility.

- All slaughter, cutting, and packing areas of the establishment shall be cleaned and sanitized before animals whose meat is eligible for export are slaughtered and processed.

It is recommended that EU production is run immediately after pre-operational sanitation and before other production runs. This will minimize the need to clean and sanitize the facility between production runs.

- Personnel shall don clean clothing and wash boots and hands before handling eligible meat.
- Meat intended for export shall not be handled, cut, or otherwise processed in the same room at the same time as meat not eligible for export.

Operators must show sufficient time and separation between the end of EU production and the start of other production. During slaughter, EU rail outs must not commingle with other production. During boning and cutting and variety meat/offal production, there must be sufficient time and space between the EU production and other production. This may be handled in the same manner a grade change is conducted.

It is recommended that there is one complete processing step between EU production and other production. For example, other production should not be on the boning table until the EU product has cleared the packing area.

- The packaging of meat intended for export shall be marked to distinguish it from meat not eligible for export. Meat must be stored in a manner that prevents cross contamination.

EU carcasses and finished product must be properly identified. EU carcasses must be kept on separate rails.

- Records of the origin of the animals from which the meat was produced shall be retained for a period of 6 months after export.

Accommodation for Sick and Suspect Animals

- Wood shall not be used for pens for sick and suspect animals.

- Sick and suspect animals shall not be allowed to come into contact with animals intended for slaughter for export to the EU.

It is recommended that the suspect pens have solid panels so that any animal body fluid cannot come into contact with other animals.

- Pens for sick and suspect animals shall be sited and constructed to preclude contact with animals intended for slaughter for export to the EU, and effluent from such pens shall not flow into adjoining pens or passageways.

It is recommended that suspect pens be constructed with coving or curbs to prevent flow of any effluent into other pens. It is best to have the suspect pen effluent flow directly into drains.

Opening of Stomachs and Intestines

- There must be a separate room for emptying and cleaning stomachs and intestines, unless the processing is done by closed-circuit mechanical equipment which avoids contamination and eliminates odors.

The room must be fully enclosed except for openings to allow product to flow in and out. Systems must be in place to minimize any odors from the stomach opening process to transfer to other parts of the plant. The best practice is to have the stomach opening, washing, scalding, polishing or finishing process contained in one room. The finished product is then dumped into the chiller in an adjacent room through a wall opening. If product is packaged in the same room as the stomach opening, there must be procedures to prevent transfer of odors into other edible areas as boxed product is removed.

Source of Raw Material

- Cutting and processing plants intending to prepare products for export to the EU must source the raw meat or poultry from EU approved slaughter establishments. The raw material must be eligible for export to the EU and bear the EU health mark. Adequate records supporting control of product transferred to separate processing facilities and cold storage warehouses must be maintained by plant management. Identification and segregation of the raw material must be acceptable to the IIC.

- Raw material may be imported into the United States for the purpose of EU production provided it bears the EU Health Mark, as described above, and has accompanying documentation that identifies the establishment of origin and demonstrates its EU eligibility. The product must also be eligible for importation into the United States. Imported product must be handled exclusively in facilities approved for the European Union, including import and cold storage facilities.

Any domestic or imported raw material from another establishment may only originate and transit through approved slaughter, cutting, and cold storage facilities.

If product is transferred from the slaughter establishment to another cutting/processing establishment and does not bear the tamper proof EU Health Mark, a transfer affidavit must accompany it. See an example of a transfer affidavit here.

Residue Testing

All samples collected under the EU Additional Residue Testing Program will be forwarded to an AMS approved laboratory for screening.

A. All slaughter establishments approved for export of poultry, meat and/or offal to the EU are required to participate in the EU Additional Residue Testing Program.

   The FSIS coordinates the additional residue testing program for products destined to the EU. However, AMS has set up the Laboratory Approval Program for export where they provide information on approved laboratories which conduct the required residue testing. The Official Listing of USDA-Approved Laboratories Export Laboratory Approval Program is available on the AMS Website.

The IIC is responsible for collecting, securing, and freezing the samples. Plant management cannot select or ship the samples. Unless the analysis is for bison, the plant must pay for all samples analyzed for the EU residue program.

Note that only laboratories listed as approved for that specific test in the Approval Details column can be utilized. For example, if a slaughter plant needs to submit an EU test sample under Table 1 (pork, steers/heifers, and wild boar) for a beta agonist analysis, only laboratories listed as approved to test for "Beta agonists" can be utilized. Please note that this may result in sub-samples needing to be sent to multiple labs in case that specific laboratory does not perform all of the requested analyses under the EU residue testing program. Further information and annual sample plans for beef, pork, wild boar, and bison can be found on the EU Export Library page.

Finland and Sweden

- Finland and Sweden require additional microbiological testing of fresh veal, beef, pork, and poultry meat for salmonella prior to export certification. The sampling methods and number of samples to be taken varies with the class of product and the size of the consignment. Specific information regarding sampling methods, number of samples to be taken, and the testing methodology is available from FSIS, Phone (202) 720-0082

- The additional testing is not required if the fresh veal, beef, pork or poultry meat is destined for the manufacture of meat products in Sweden or Finland.

The EU Regulation No 1688/2005 includes the specific requirements for testing products destined for Finland and Sweden. Requirements for testing are in place for both fresh and frozen beef and pork.

*Please note that if you are exporting **cuts** (any primals or sub-primals), you must follow the procedure listed in Annex I, Section A.2. of the aforementioned regulation. This requires you to submit the samples for **destructive** analysis; a swab analysis will result in a possible rejection of the product when entering Finland or Sweden. Swab testing is only allowed if the carcass, half-carcass, or quarter-carcass is being exported itself, which is not the case for U.S. exports to the EU.*

Compliance Oversight by FSIS

- Production modes - Plants must be in an EU production mode whenever producing for EU export. It is not necessary that establishments be in an EU mode when producing for non-EU markets. However, all establishments must provide an EU mode control program to the IIC to assure that all EU requirements are met before beginning EU production. The plant must be in the EU mode during prescreening by FSIS and during any EU review. The key role in assuring compliance with the requirements for export to the EU is with the IIC. If an approved plant is not in compliance with the EU requirements, the IIC should withhold the use of the EU health mark label (See Section XIII.) and notify plant management of the non-compliance through a memorandum of interview (MOI). The EU health mark label should be returned to the secured location until the deficiency has been corrected. Product not bearing the EU health mark label was not produced according to the requirements for export to the EU and is not eligible for export certification to an EU member state.

- An EU approved plant will be reviewed periodically to assure that the EU listed plant continues to comply with standards for export of product to the EU. Export Notice 2005-2, April 1, 2005, provides information regarding the EU conformance verification review procedure, including documenting the review on the revised FSIS Form 9100-1 (03/25/2010), EU Conformance Verification Checklist for Meat and Poultry Establishments to be Used in Conjunction with the Export Requirements for the European Union. The new FSIS Form 9100-1 has been revised to reflect the requirements indicated in Section II above. In accordance with Export Notice 2005-2, the Checklist should be completed a minimum of once per year and for plants that produce product for export to the EU on a routine basis, the review should be conducted each calendar quarter that product is produced. The FSIS inspector in charge (IIC) at the establishment should submit a scanned copy of the Checklist to FSIS at importexport@fsis.usda.gov, or by fax at (202) 720-7990. Any change in the status of the establishment, such as alteration of name or discontinuation of operation in the EU mode should also be submitted to the EPS.

The quality manual must include specifics of how the plant will operate in "EU mode." For example, if the establishment uses antimicrobial treatments not approved by the EU, such as peracetic acid, it must detail how it will ensure those cabinets are turned off during EU mode. The plant must run in EU mode during the initial FSIS approval visit and during any audit visits by the EU. The IIC will complete the FSIS form 9100-1 checklist a minimum of once annually to

verify compliance. If the plant produces for the EU routinely, the checklist will be completed once per quarter.

III. Antimicrobial Treatments

With the exception of lactic acid solutions used on bovine or bison carcasses, antimicrobial treatments (for example, hyperchlorination, TSP, citric or ascorbic acids, etc) are not allowed for treatment of red meat or poultry carcasses, parts or viscera. Only the application of water or steam is permitted.

Lactic acid, steam, and hot water are the only approved antimicrobial treatments (AMTs) for the EU.

Lactic Acid

Lactic acid can only be applied to beef, veal, and bison carcasses.

Lactic acid cannot be applied to pork carcasses or parts destined for the EU.

The regulation which allows the use of lactic acid solutions on bovine and bison carcasses, half carcasses, or quarters to reduce microbiological surface contamination at the slaughterhouse destined for export to the EU becomes effective on February 25, 2013. Provided they meet all other export requirements for export to the EU, bovine and bison carcasses, half carcasses, or quarters treated with lactic acid solutions on or after February 25, 2013 can be certified for export by FSIS.

A. Conditions of use of lactic acid to reduce microbiological surface contamination of bovine and bison carcasses, half carcasses or quarters at the slaughterhouse. The EU does not permit the use of lactic acid on cuts or trimmings.*

1. Lactic acid solutions must:

   a. only be applied on entire carcasses or half-carcasses or quarters of meat from domestic bovine animals (including Bison species) at the slaughterhouse.

      Lactic acid cannot be applied to primals, sub-primals, cuts, offals, or trimmings. It can only be applied down to the quarter carcass level.

      *Lactic acid can only be utilized at slaughterhouses. However, as long as it is **not** applied to a product smaller than a quarter carcass, it can be used on both the hot and cold sides of the facility.*

   b. only be applied either by spraying or misting using from 2% to 5% lactic acid solution in potable water at temperatures of up to a maximum of 55°C.

   c. be applied under controlled and verifiable conditions integrated as part of the HACCP plan that include

- verification by periodic monitoring, documenting and recording the lactic acid concentration during treatment; and
- continuous monitoring by instrumental measurements, documenting and recording the temperature of the lactic acid solution during treatment.

d. not be applied to carcasses with visible fecal contamination.

2. The application of lactic acid solutions must not result in any irreversible physical modification of the meat.

3. Establishments utilizing lactic acid within a HACCP-based management system must maintain documentation that validates the antimicrobial efficacy of the lactic acid treatments under their specific processing conditions and verify the lactic acid concentration, temperature of application and other factors affecting the efficacy of lactic acid as a decontaminating agent. The establishments must inform the EU facility receiving the treated carcasses, half-carcasses or quarters of such use. This information should be documented.

Documentation of lactic acid use on export documents is not required for plants exporting primals, sub-primals, cuts, ground beef, or trimmings.

Recycled Hot Water

Recycled hot water is only allowed for use in cabinets in slaughterhouses but is approved for both beef and pork. USMEF is still working with USDA on compiling a common interpretation of the requirements for use detailed in the recycled hot water regulation. Until these interpretations are included in this document, please contact Cheyenne McEndaffer (cmcendaffer@usmef.org) with any questions you may have if you are using recycled hot water in your plant.

Use of recycled hot water is only permitted when integrated into the facilities HACCP system and applied consistently with Commission Regulation (EU) 2015/1474.

Note: The EU regulation which allows the use of recycled hot water to remove microbiological surface contamination from carcasses becomes effective September 18, 2015. Provided they meet all other export requirements for export to the EU, the entire carcass or half carcasses of domestic ungulates and farmed game treated with recycled hot water on or after September 18, 2015 can be certified for export by FSIS.

A. Conditions of use of recycled hot water to remove microbiological surface contamination from whole or half carcasses of domestic ungulates and farmed game at the slaughterhouse.
   1. Recycled hot water must:
      a. Be obtained from heating ad recycling potable water in a closed and separated system;
      b. Be submitted to:

- A minimal heating temperature/time regime before its application on carcasses which must ensure compliance with microbiological parameters of the potable water; and
- A renewal regime at the appropriate frequency including, where necessary, skimming of gross particles, filtration and addition of potable water, which must ensure compliance with the chemical parameters of potable water

c. Be only applied on entire carcasses or half carcasses of domestic ungulates and farmed game, under controlled and verified conditions;
d. Not be applied to carcasses with visible fecal contamination;
e. Not result in any irreversible physical modification of the meat;
f. Be performed before the carcasses are placed in the chilling or refrigeration room;

2. Minimum HACCP criteria and control parameters:
   a. Sampling of carcasses for the purpose of assess compliance within the meaning of Regulation (EC) No. 2073/2005 must be carried out before the application of recycled hot water on carcasses;
   b. The minimal heating temperature/time regime applied to recycled water before its application on carcasses must be continuously monitored by instrumental measurements, documented and recorded;
   c. The compliance of the recycled water applied on carcasses with the microbiological and chemical parameters set up for potable water must be verified periodically by testing of water, documented and recorded;
   d. The compliance of the recycled water applied on carcasses with indicator parameter of *Clostridium perfringens* set up for potable water must be verified by periodic monitoring, documented and recorded

Note: The conditions in points (b) and (c) above must be integrated in the procedures based on the HACCP principles including at least the criteria set out in section (2) below.

IV. Plant Approval Process

AMS Export Verification (EV) approval for the EU, either Pork for the European Union (PFEU) or Non-Hormone Treated Cattle (NHTC), is only required for slaughter plants. Further processors/cutting plants (not slaughtering) and cold storages only need EU plant approval through FSIS. No AMS EV is needed at these establishments.

A. Under Council Decision 98/258/EC (the Veterinary Equivalence Agreement):

1. FSIS, Phone (202) 720-0082 or importexport@usda.gov, will provide technical assistance regarding the provisions of the agreement to plant management and FSIS personnel. In addition, U.S. Meat Export Federation (303) 623-6328) and U.S.A. Poultry and Egg Export Council (770) 413-0006 may provide technical assistance to plant management interested in EU approval.

2. Plant management seeking EU approval should complete and submit FSIS Form 9080-3, Establishment Application for Export, to FSIS in PHIS. The IIC will confirm that an establishment complies with the conditions of the Agreement as outlined in the Library of Export Requirements for the European Union and document the review on FSIS Form 9100-1, EU Conformance Verification Checklist for Meat and Poultry Establishments to be Used in Conjunction with the Export Requirements for the European Union. The exporter must upload the completed form and attach it to the 9080-3 request in PHIS.

   NOTE: All 9080-3 requests must be submitted through PHIS. IPP will not accept paper forms for review on or after June 29, 2018. The exporter must upload the completed 9100-1 Form and attach it to the 9080-3 request. The request will not be processed if a required 9100-1 Form is not included in the application. Establishments that are not using PHIS must submit a fully completed (not including FSIS signatures) 9080-3 Form with a completed 9100-1 Form attached to the FSIS Proxy for entry into PHIS. Information on sending completed Forms to the FSIS Proxy is available on the FSIS Export Library - Requirements by Country page or by clicking here.

3. Plants that comply with the conditions stated herein will be submitted to the EU for approval. FSIS will certify to the EU that U.S. meat and poultry establishments comply with the appropriate conditions as outlined above. The EU will approve and list the plants in a timely manner. Plants may begin producing for export to the EU under the conditions of the new agreement on the date of EU listing.

4. Farmed Game plants are reviewed by FSIS and determined to meet EU requirements for export. Farmed game plants are recommended to EU through FDA, as the competent authority. Application and review matters are conducted by the IIC in the establishment The IIC will confirm that an establishment

complies with the conditions of the Agreement as outlined in the Library of Export Requirements for the European Union and document the review on FSIS Form 9100-1, EU Conformance Verification Checklist for Meat and Poultry Establishments to be Used in Conjunction with the Export Requirements for the European Union. The exporter must upload the completed form and attach it to the 9080-3 request in PHIS. Plants that comply with the conditions stated herein will be submitted to the EU. For further information on FDA regulations covering farmed game, contact Dr. Jeff Hamer at jeff.hamer@fda.hhs.gov.

5. The EU has the right to audit approved plants to confirm that they comply with the conditions of the agreement.

Approval Steps:

1. *Submit FSIS Form 9080-3 to the IIC*
2. *FSIS may perform an on-site audit to confirm conformity with the requirements*
3. *FSIS must complete the FSIS Form 9100-1 (NHTC and PFEU controls are part of this review, but AMS NHTC or PFEU plant approval is not required prior to completing and submitting the 9080-3 and 9100-1. AMS NHTC or PFEU approval can only be finalized after the plant receives FSIS EU plant approval.)*
4. *The establishment must identify which products and/or processes it will request approval for (see EU approval list)*
5. *Once approved, FSIS will submit the application to the EU. The plant cannot start producing for the EU until the establishment is listed in the approval list mentioned in Point 4, as well as has AMS NHTC or PFEU approval (for slaughterhouses only).*
6. *If a product (i.e. ground beef, MSM, meat preparations) needs to be added after approval has already taken place, the company must add that product and process to the EU mode program and share it with the IIC. FSIS will request that the establishment approval information be updated to include the new product category.*

Plants Eligible for Export

A. Lists of eligible plants for the various product categories are available through the Export Library. Plants must meet all EU requirements in addition to being listed on the appropriate list. Cold storage approval is not species specific. Establishments with cold storage approval are eligible to store product of any species.

   The European Union official website where EU lists are published is available at Establishment Lists - TRACES NT (europa.eu). Scroll to "United States" and click on the list of interest.

For cuts, eligible slaughterhouses, cutting plants, and cold storages will be listed in "Meat of domestic ungulates." Ground beef and other preparations are included in "Minced meat, meat preparations and MSM."

Any cold storage that holds and/or exports product to the EU must be EU approved. Cold storage approval is not specie-specific.

Transit (to non-EU third country, ships' stores, and U.S. military)

Products intended to ship under the transit certificate are eligible from any federally inspected establishment (no EU plant approval is required). However, slaughter plants must be EU Transit EV approved. Further processors and cold storages do not require EU Transit EV approval. More details can be found here: https://www.ams.usda.gov/services/imports-exports/products-transiting-eu

If a slaughter establishment needs to seek EU Transit EV approval, follow the below steps:

1. *New users of AMS programs should complete an LP109 application and send it along with any applicable procedures and an email request for this program to QAD.Auditservice@usda.gov .*
2. *Applicants who already use AMS audit services should just send an email request to add this program along with applicable procedures to QAD.Auditservice@usda.gov .*

Exporters can also source compliant product from slaughter plants approved under the NHTC (beef), PFEU (pork), and/or Bison for Canada and EU EV programs as they automatically qualify for transit eligibility.

Military Shipments

Documentation for military shipments must have a physical address listed. Port officials cannot deliver product to a P.O. box.

Common questions on Transit EV approval and new transit documentation (as of 1/15/22):

Q1: Will EV-approved product from the slaughter plant need to indicate EV-compliance on the label?

A1: EV compliance has to be on the shipping documentation (going to the next location in the U.S., such as a further processor or cold storage), NOT the label/box itself. It MAY be on the label/box, but is not required. See this excerpt from the AMS procedure:

> **6** Shipping Documentation
>
> **6.1** Identification of conforming product during shipment and delivery must be documented on the shipping documentation (bills of lading, shipping manifests, or letters of guarantee). The shipping documentation must:
>
> **6.1.1** Clearly identify the product and product quantity; and
>
> **6.1.2** Contain the following applicable statement:
>
> **6.1.2.1** "Product Meets EV Program Requirements for EU Transit"

Q2: What about purchasing animals from a sale barn?

A2: To be eligible, the slaughter facility would have to obtain the documentation of origin and affidavit for vet visits from the establishment (farm, ranch, backgrounder, feed lot, etc.) the animals came from prior to the sale barn. If they cannot obtain the documentation, the animals would be ineligible.

Q3: If a plant already receives a signed affidavit annually attesting to some other feed requirements on the plants they work with, would they be able to add a statement that applies to the record keeping and vet visits and have this one affidavit letter act as an umbrella to cover all the shipments from that feedyard? So instead of having one affidavit per shipment of cattle, they'd be getting one for the entire year.

A3: Yes, an affidavit covering all shipments is okay, one is not needed with every shipment, and it can cover multiple points. The key is if to have a procedure to identify non-conforming animals (if they have any) or conforming animals, either way. If all animals shipped from an establishment are conforming and they will not ship any non-conforming animals, a segregation/identification procedure is not necessary, just the affidavit.

Q4: Is there a template of a supplier affidavit?

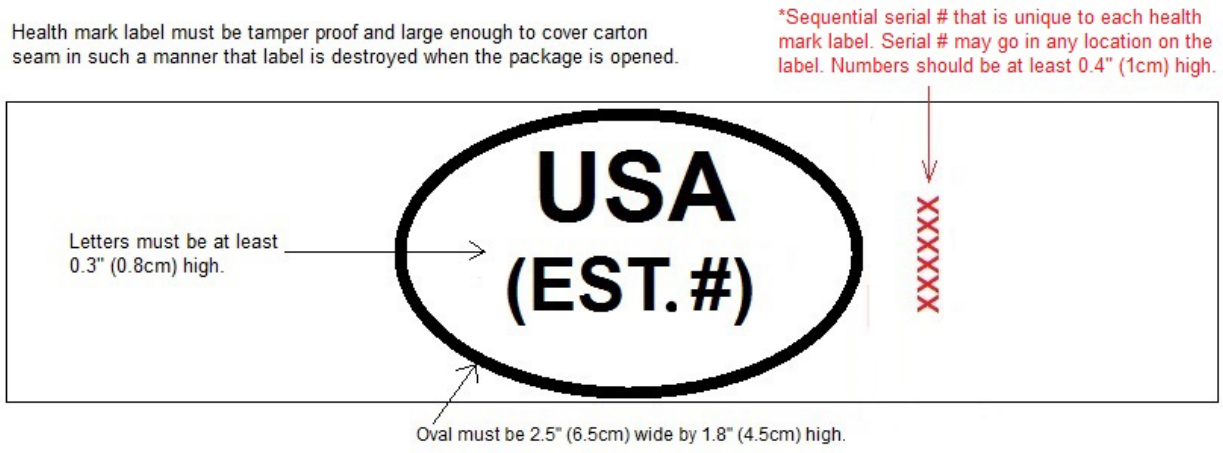
A4: No, AMS did not develop a template as they are leaving that up to each individual plant since they are accepting many different forms of proof and there are already many in place. As long as it addresses vet visits, record keeping and if applicable no direct slaughter imports, they are good.

V. Labeling

Health Marks

For product destined to the EU (not transit), health mark labels must be applied to each carton of product in such a manner that the health mark label is destroyed when the package is opened. The health mark label must bear the following information:

- The oval mark must be 2.5 inches (6.5cm) wide by 1.8 inches (4.5cm) high.
  - within the oval:
    - in the center - the establishment number.
    - in the upper or lower part - the letters USA.
    - the letters must be at least 0.3 in (0.8 cm) high and the numbers should be at least 0.4 in (1 cm) high.
  - a sequential serial number that is unique to each health mark label for that establishment.





The health mark must be placed so that opening of the box will result in destruction of the label. Health marks must be applied before the product is transferred to a cold storage. A transfer

affidavit can only be used for transfer between slaughter and cutting or processing establishments. A transfer affidavit cannot be used in place of the health mark for transfer to a cold storage.

For two piece boxes, it is acceptable to use two health marks to ensure the tamper proof placement requirement is met. However, it is recommended that the exporter make the importer aware of this process so they can answer any questions the EU inspector may have.

Food Information to Consumers (FIC) Labeling

Information on the EU's FIC labeling (effective as of 12/13/14) can be found at this FAS EU Labeling Requirements page. Meat must be labeled in a language easily understood by the consumers of the MS that the product will be sold in. It is also recommended that the exporter verify with their importer the language requirements of the intended MS(s) of sale.

In regards to the question of having to meet the FIC labeling requirements for bulk packed exported product, please see this excerpt from FAS:

2.1.2 In the case of a 'multipack' package consisting of individually packed items which are sold by producers to wholesalers/retailers, should the mandatory particulars required under Articles 9 and 10 of the FIC Regulation appear on each individually packed item?

This transaction concerns a stage prior to sale to the final consumer where the sale/supply to mass caterers is not involved. In such a case, the mandatory particulars required under Articles 9 and 10 of the FIC Regulation shall appear in one of the following places:

- On the prepackaging [*i.e.* on the 'multipack' package]; or,
- On a label attached thereto; or,
- On the commercial documents referring to the foods, where it can be guaranteed that such documents either accompany the food to which they refer or were sent before or at the same time as delivery. In such cases, however, the following particulars must also appear on the external packaging in which the prepacked foods are presented for marketing:
  - The name of the food;
  - The date of minimum durability or the 'use by' date;
  - Any special storage conditions and/or conditions of use;
  - The name or business name and address of the responsible food business operator.

Therefore, each individually packed item need not to be labelled as such. However, if the wholesaler/retailer decides to sell the individually packed items to the final consumer, he must ensure that the mandatory particulars required under Articles 9 and 10 of the FIC Regulation appear on each one of them, on the basis of the information appearing on the prepackaging or on a label attached thereto or on the accompanying commercial documents.

Beef Labeling

Beef Labeling - Additional labeling information must be present on fresh, chilled, or frozen beef arriving in the EU as of January 1, 2002. The labeling requirement applies to all beef intended for human consumption, with the exception of processed products and offal other than thin skirt and thick skirt. *Bison also fall under this labeling, per Regulation 1760/2000 and Directive 64/432/EC. This was confirmed with FAS/Brussels in 2020.* The beef must be labeled as follows:

- Exporters must display the following information on labels attached to an individual piece or pieces of meat or to their packaging material:
  If the box contains bulk product for further processing or final packaging in the EU or is destined for HRI use, then only a box label is needed. Retail- or consumer-ready packages must be individually labeled, in addition to the box label. Individual package labels can either be inserts or stickers; however, it is recommended that you check with your importer on this as well.
  - A reference number that links the meat with the individual animal from which it originates. In the case of meat derived from a group of animals with a homogeneous background, which enables the accuracy of the information to be checked, the reference number can link the meat with the group of animals rather than an individual animal. For the purposes of this labeling requirement, the size of a group of animals is limited to one day's production. There is no specific requirement for the format of the reference number as long as it provides linkage to the animal or group of animals and the origin premises.
  - The phrase "Slaughtered in the United States: Establishment (FSIS slaughter establishment number).
  - The phrase "Cut in the United States: Establishment (FSIS cutting establishment number).
  - The phrase "Origin: United States" if the animals were born, raised and slaughtered in the United States. In the case of imported animals, the countries of birth and of feeding must be indicated.
    - If the animals were raised in a country other than the United States for less than 30 days, an indication of the other country is not required. (EU implementation of point 4 is January 1, 2002, rather than January 1, 2001.) In the case of bison coming from Canada and slaughtered in the United States, the required labeling would be as follows: "Born and raised: Canada/Slaughtering: USA Est. – No xxx,/Cutting: USA Est- No xxx/Reference-No".
  - Note: Minced meat should indicate: "Prepared in the United States".
  - When the origin of the meat is unknown, exporters must display the following information on cartons and vacuum bags: "Origin: Non EC and slaughtered in the United States".
  - The labeling is mandatory to the retail level in the EU, or to the point of preparation in the case of product used for HRI purposes.

More information on beef labeling can be found at the FAS Trade with EU site and in the EC Regulation 1760/2000 (Articles 11-17).

It is not permitted to mention "non-hormone treated cattle", "NHTC" or any other reference to the non-use of hormones in the production of the beef on the labels for terminology of U.S. beef in the EU marketplace.

Labeling of Frozen Meat

Fresh meat cuts which have undergone a freezing process must bear an indication of the month and year in which it was frozen.

VI. Beef Specific Requirements

High Quality Beef Documentation

The NHTC program does not require cattle to be under 30 months of age (UTM) at the time of slaughter. However, if an exporter intends to ship beef or bison under one of the High Quality Beef (HQB) quotas, the animals must be UTM.

More details on the two HQB quotas are available in the USMEF EU High Quality Beef Quota Documentation Guidance Document and Beef Quotas for NHTC Cattle to the EU Summary Sheet.

Ground (minced) beef with no added ingredients qualifies for import under the zero duty HQB quota, whether chilled or frozen.

Product Categorization

The hanging tender has been reclassified by the EU, so is considered a muscle cut rather than an offal.

VII. Other Requirements

Packing Materials

European Union requires treatment of all packing material made of conifer materials as a preventive measure against pinewood parasites. This includes wood pallets. USDA, APHIS has established a marking procedure for treated pallets. More information is available at APHIS' Wood Packaging Material (WPM) site.

This is also required for product destined for ships' stores.

Product for Personal Consumption and Samples

Products for personal consumption must meet all export requirements found in this document, i.e. be certified from an eligible plant (see EU plants lists) and be accompanied by all required certificates issued by an FSIS veterinarian. Hand carried or mailed items will not be allowed unless they meet these requirements. EU member countries are listed at the beginning of this document).

The EU does not offer exemptions for personal consumption products, e.g. any product hand-carried on a plane or mailed, no matter how small the volume. Thus, any personal consumption product must meet all EU requirements (NHTC or PFEU, come from approved plants, etc.).

If a trade show has set up a special certificate for allowing samples that do not need to conform to all of the EU requirements, it will be listed under that specific country's FSIS Export Library page. If there is no exemption listed for that specific trade show, all samples, for trade shows or customers, must meet all EU requirements, similar to the requirement for personal consumption detailed above.

VIII. Documentation

Approved Establishments

All EU-approved establishments listed on the certificate (abattoir, cutting plant, cold store, etc.) and labels must list the establishment number exactly as listed in the EU approved list. If there is any discrepancy from the EU listing, such as adding or removing beginning zeros or putting the "M" before or after the number, the product may be detained. If your establishment number(s) is listed incorrectly in the EU list, please contact FSIS/DC to request a correction: (202) 720-0082 or importexport@fsis.usda.gov .

Mince (Ground Meat) Shipments

If the ground product (e.g. ground beef or pork), contains less than 1% salt and no added ingredients, you must use the appropriate fresh meat certificate for that species. For example, if you are sending ground beef with no added ingredients, you should use the Fresh Meat of Domestic Bovines *certificate. Sending ground product with added ingredients would necessitate use of the* Meat Preparations *certificate.*