



Information Notice to Trade

Origin Guidelines for Export Health Certification

The Sea-Fisheries Protection Authority has issued this Information Notice in relation to technical requirements for Irish companies trading with Third Countries in an evolving third country regulatory environment.

For consignments of fish, fishery products and molluscan shellfish to be exported to third countries outside the EU they need to be accompanied by an export health certificate and certificate of origin.

In order for the SFPA to be able to issue these certificates the products within the consignment must be of Irish origin.

Customs legislation (Article 60 of [Regulation \(EU\) No. 952/2013](#)) allows for product to be deemed Irish if:

1. The goods were wholly obtained in Ireland (Caught by Irish flagged vessels)

Or

2. If Ireland is the territory in which they underwent their last substantial processing or working.

1. The goods were wholly obtained in Ireland (Caught by Irish flagged vessels)

Fishery Products caught by Irish flagged vessels can be certified for export using the relevant Export Health Certificate and Certificate of Origin template by the SFPA as long as the application comes from an SFPA approved establishment.

2. If Ireland is the territory in which they underwent their last substantial processing or working.

Under Article 2 of [Regulation \(EU\) 852/2004](#):

“processing’ means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes”

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“Processing” in this context also includes products that have undergone an operation affecting their anatomical wholeness for example, gutting, heading, slicing, filleting or chopping.

This means that any products that are derived from fish caught by third country vessels but subjected to any of the above processes in Ireland can then be said to be product of Irish origin under the regulations and therefore can be issued with Export Health Certificates and Certificates of Origin by the SFPA.

China

In the case of exports to China, the above applies to exports of fishery products.

However, an attestation in the Chinese live aquatic animals certificate (shown below) dictates that the species in these consignments must have been farmed or caught under the supervision of the signing competent authority.

IV. HEALTH ATTESTATION

The undersigned official inspector hereby certifies the aquatic animals described above that:

(1) Are wild caught or from an official registered cultured farm or package establishment.

(2) have been farmed, or caught, packed, identified, stored and transported under sanitary conditions and under supervision by the competent authority.

(3) were inspected by the Irish competent authority and are not considered to contain any pathogenic bacteria, harmful substances or foreign substances according to the relevant EC regulations.

(4) have had no use of the prohibited drugs such as crystal violet, malachite green, uritrate, chloromycetin and hormone. Other drug residues and residues of heavy metal such as arsenic, mercury and lead should not exceed Chinese limitation standard for these aquatic animals. The national competent authority for seafood safety certifies that the animals come from a catch area as specified in this certificate and as listed in a national monitoring programme designed to assess Cadmium levels as prescribed by the Chinese Standard.

(5) The pathogenic microorganisms such as *Escherichia Coli* (O157), *Salmonella*, *Listeria Monocytogenes*, *Vibrio parahaemolyticus* and *Vibrio cholerae* (O1,O139) are not found by testing before export for these aquatic animals.

(6) No clinical symptoms of zoonosis or parasitic diseases have been found before export for these aquatic animals.

(7) The live aquatic animals described above meet veterinary and sanitary requirements and are fit for human consumption.

No such attestation is present on the fishery products certificate.

Therefore, for exports to China:

- 1. For fishery products and live aquatic animals caught by Irish flagged vessels or harvested by FBOs under SFPA remit - the Chinese specific certificate of origin and Chinese specific EHC can be issued by the SFPA.*

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2. *Fishery products derived from fish caught by third country vessels but processed in Ireland as laid out above – The Chinese specific certificate of origin and Chinese specific EHC for fishery products can be issued.*
3. *Live Aquatic Animals caught by third country vessels or harvested by FBOs under the supervision of a competent authority other than the SFPA – Chinese specific certificate of origin and Chinese specific live aquatic animals certificate **can not** be issued by the SFPA.*

Queries regarding this information notice may be addressed to SFPATradeandAudit@sfpa.ie

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