



Animal &  
Plant Health  
Agency

## APHA Briefing Note 51/25

# Notification of new requirements for Exports of Fishery products, Dairy, Collagen and Gelatin for Human Consumption to Türkiye

Date issued: 31 December 2025

### Purpose

1. To inform certifiers (Official Veterinarians and Food Competent Certifying Officers) of updated measures for the registration of exporting establishments of (non-live) fishery products, dairy, collagen and gelatin for human consumption from Great Britain (GB) to Türkiye.

### Background

2. Defra have very recently become aware of additional registration requirements for exports to Türkiye from TRACES-NT listed GB establishments of (non-live) fishery products, dairy, collagen and gelatin for human consumption that will be enforced as of **1 January 2026**. A request for an extension to this deadline has been denied.
3. The following Export Health Certificates (EHC) to Türkiye for (non-live) fishery products, dairy, collagen and gelatin for human consumption have therefore, been placed on hold and are not currently available:
  - 6993EHC - Export of dairy, egg or gelatin based products
  - 7539EHC - Export of dairy products not on certificate 7540 for human consumption
  - 7540EHC - Export of dairy products from cows, sheep, goats and buffaloes
  - 7756EHC - Export of fish products for human consumption
  - 8025EHC – Export of collagen intended for human consumption.

4. Exports of these products certified on or after 1 January 2026 will be rejected from establishments not listed on TROIS (Approved Establishment System of the Republic of Turkey).
5. To enable future exports, the registration process requires that for GB sites listed on TRACES-NT, establishments must be listed on an Annex 2 Establishment Approval List, and an Annex 3 Checklist must be completed by exporters. The checklist must be endorsed by the certifier. Example copies of the Annex 2 Establishment Approval List and Annex 3 Checklist are attached as Appendices 1 and 2 below.
6. Defra are working with colleagues in the British Embassy in Türkiye to seek clarification from the authorities on parts of the approval process and will provide further guidance as soon as possible.
7. Provided there are no issues with the Annex 2 Establishment Approval List and Annex 3 Checklist submissions, Defra have been informed that registration on TROIS will be completed within five to seven days of the exporter submitting the required documents. Once sites are registered, Defra can make the EHCs listed above available again to enable trade for approved exporters to recommence.

## Action

8. Certifiers should be aware of the new registration requirement that requires a checklist endorsed by an OV or Official Inspector, and that active exporters to Türkiye could approach you about this process.
9. Certifiers must not certify the above listed EHCs on or after 1 January 2026 whilst they are on hold.

## Further Information

All queries regarding the information above should be directed to [exports@apha.gov.uk](mailto:exports@apha.gov.uk) in the first instance.

## Appendix 1

### Annex 2

#### EK-2/ANNEX-2

İhracat Talebinde Bulunan AB Onaylı İşletmelere İlişkin Tablo/Table regarding EU-Approved Establishments Requesting Export

ÜLKE İSMİ/Country Name:

Sıra/Num ber	İşletme Adı/Name of Establish ment	İşletme Adresi/Establis hment Address	İşletme Onay Numarası/ Approval Number of Establish ment	İşletmenin AB Onay Numarası/ EU Approval Number of Establish ment	Ürün Sınıfı / Product Categor y <sup>*(1)</sup>

\*Balıkçılık ve Su Ürünleri, Süt Ürünleri, Kolajen-Jelatin /Fishery and Aquaculture Products, Dairy Products, Collagen-Gelatin.

(1)Ürün sınıfının kolajen-jelatin olması durumunda hayvan türünü belirtiniz./If the product class is collagen-gelatin, please specify the animal species.

## Appendix 2

### Annex-3

#### ESTABLISHMENT-RELATED CHECKLIST

ESTABLISHMENT INFORMATION		
Name of the Establishment:		
Address of the Establishment:		
Establishment Registration/Approval Number:		
MINIMUM TECHNICAL, HYGIENICAL AND INFRASTRUCTURAL REQUIREMENTS WHICH AN ESTABLISHMENT SHOULD HAVE		
PART 1	YES	NO
<b>A- GENERAL CONSIDERATIONS</b>	<input type="checkbox"/>	<input type="checkbox"/>
a) Is the establishment set up in a place that will not lead to the contamination and pollution?	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the establishment clean and in good condition? Does it have a regular maintenance and repairs?	<input type="checkbox"/>	<input type="checkbox"/>
c) Have the necessary arrangements been made for the evacuation of rain and wash water?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Have all connections of the external facade of the building, including corrugated structures, been constructed in a way to prevent the housing of birds, insects and rodents?	<input type="checkbox"/>	<input type="checkbox"/>
d) Has the design and plan of the rooms where the food is prepared, subjected to treatment or processed been designed in a way to enable the practices of good food hygiene including the protection against the contamination during processes and between processes including the rooms where transport vehicles are situated?	<input type="checkbox"/>	<input type="checkbox"/>
e) Does the establishment prevent or minimize the airborne contamination?	<input type="checkbox"/>	<input type="checkbox"/>
f) Has the establishment been constructed in a way to prevent the concentration, drop, dirt and mildew accumulation?	<input type="checkbox"/>	<input type="checkbox"/>
g) Has the establishment been constructed in a way to prevent the contact with toxic substances and not to allow the particles to fall into the food?	<input type="checkbox"/>	<input type="checkbox"/>
ğ) For use in necessary cases, are there separate washing units for food apart from hand-washing units?	<input type="checkbox"/>	<input type="checkbox"/>
h) Have the sinks and other equipment used for washing of food been designed in a way easily cleanable and disinfectable?	<input type="checkbox"/>	<input type="checkbox"/>
ı) Have the toilets been designed not to open directly into the rooms where the food is processed?	<input type="checkbox"/>	<input type="checkbox"/>
i) Does the identification mark exist in accordance with the food legislation?	<input type="checkbox"/>	<input type="checkbox"/>
j) Is the food protected against contamination during all stages of production, processing and distribution?	<input type="checkbox"/>	<input type="checkbox"/>
k) Have necessary measures been taken in the establishment not to use raw materials or components which make the final product inappropriate for human consumption in the production of	<input type="checkbox"/>	<input type="checkbox"/>

manufactured products (parasites, pathogenic microorganisms, toxins, etc.)?		
<b>B - FLOOR-WALL-CEILING STRUCTURE</b>	<b>YES</b>	<b>NO</b>
a) Have the wall surfaces been designed in a form solid, easily cleanable and disinfectable if necessary?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the wall surfaces been made of waterproof, non-absorbent, washable and non-toxic materials?	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the wall have a smooth surface up to a certain height appropriate for operations?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Have the floor surfaces been designed in a form solid, easily cleanable and disinfectable?	<input type="checkbox"/>	<input type="checkbox"/>
d) Have the floor surfaces been made of waterproof, non-absorbent, washable and non-toxic materials?	<input type="checkbox"/>	<input type="checkbox"/>
e) Have the floor surfaces been designed to allow adequate drainage?	<input type="checkbox"/>	<input type="checkbox"/>
f) Have the ceilings or the inner surface of the roof where the ceiling does not exist and construction elements or equipment in the roof or ceiling been constructed in a way to prevent the dirt accumulation, concentration, development of unwanted mold and to prevent the particles to fall into the food?	<input type="checkbox"/>	<input type="checkbox"/>
<b>c- WASTEWAY CHANNELS AND DRAINAGES</b>	<b>YES</b>	<b>NO</b>
a) Has the drainage system been designed to avoid the risk of contamination?	<input type="checkbox"/>	<input type="checkbox"/>
b) In the case that drainage channels are fully or partially open, have these channels been designed in a way to prevent the flow of waste from contaminated areas to clean areas and especially towards or inside the areas where the food is treated which constitutes a high risk to the end consumer?	<input type="checkbox"/>	<input type="checkbox"/>
<b>ç- DOORS AND WINDOWS</b>	<b>YES</b>	<b>NO</b>
a) Have all doors been made of cleanable, disinfectable, smooth and non-absorbent materials?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have windows and other openings been built in such a way to prevent the accumulation of dirt?	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the equipment which can be easily removed with cleaning purposes exist on windows opening to outdoor environment in order to prevent the entry of insects and rodents, where necessary?	<input type="checkbox"/>	<input type="checkbox"/>
d) Does the gates of raw material acceptance and final product exit have a system like the articulated system in order to prevent contamination?	<input type="checkbox"/>	<input type="checkbox"/>
<b>D- VENTILATION / AIR CONDITIONING</b>	<b>YES</b>	<b>NO</b>
a) Have appropriate and adequate natural or mechanical ventilation systems been available?	<input type="checkbox"/>	<input type="checkbox"/>
b) If any, have mechanical ventilation schemes been designed in a way to provide airflow from clean areas to dirty areas and not to direct the air circulation towards the desks?	<input type="checkbox"/>	<input type="checkbox"/>
c) Has the ventilation system been placed in a way to access easily to filters and parts that need to be cleaned and replaced and not to have gap on the edge?	<input type="checkbox"/>	<input type="checkbox"/>
<b>E- LIGHTING SYSTEM</b>	<b>YES</b>	<b>NO</b>

a) Has the adequate, natural and / or artificial lighting which will not affect the product, that will not change the natural structure and color of the product been provided?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have all lamps been encapsulated to avoid falling glass fragments in case of breakage? Have all lamps been safeguarded by using damage-resistant covers?	<input type="checkbox"/>	<input type="checkbox"/>
<b>F- REQUIREMENTS RELATED TO EQUIPMENT</b>	<b>YES</b>	<b>NO</b>
a) Has the equipment been arranged so as to allow for adequate cleaning of itself and the surrounding area?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the tools and equipment been designed in a corrosion-resistant, easily cleanable and disinfectable way, and in a way to minimize the risk of contamination?	<input type="checkbox"/>	<input type="checkbox"/>
c) Including surfaces in areas where the food is subjected to the treatment, have all surfaces in contact with food been made of solid, easily cleanable, smooth, corrosion-resistant and non-toxic materials?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Does adequate equipment and a separate area / department exist for the cleaning, disinfection and storage of working tools and equipment, where necessary?	<input type="checkbox"/>	<input type="checkbox"/>
d) Is there appropriate equipment for the washing of food?	<input type="checkbox"/>	<input type="checkbox"/>
e) Has the adequate hot and cold water connection been available in the area where food is washed?	<input type="checkbox"/>	<input type="checkbox"/>
<b>G- TRANSPORT</b>	<b>YES</b>	<b>NO</b>
a) Have the vehicles or containers used for transporting food been clean and maintained well according to the disinfection?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have necessary measures been taken to enable that vehicles and / or vessels within containers are not used for transporting any material other than food?	<input type="checkbox"/>	<input type="checkbox"/>
c) In the event that the food and substances other than food or different food are transported simultaneously and together, is it ensured the separation of the products?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Are vehicles and / or containers effectively cleaned between loading and disinfected when necessary?	<input type="checkbox"/>	<input type="checkbox"/>
d) Is the food placed in vehicles and / or containers in a way to minimize the risk of contamination?	<input type="checkbox"/>	<input type="checkbox"/>
e) Have transport vehicles been designed in a way to to maintain the food at a suitable temperature and to allow for monitoring the said temperature?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Ğ- HEAT TREATMENT</b>	<b>YES</b>	<b>NO</b>
a) Does the heat treatment method applied raise the temperature applied to each side of the product processed within the time period given and does it prevent the contamination of food?	<input type="checkbox"/>	<input type="checkbox"/>
b) Are the related main parameters particularly such as the temperature, the pressure and the closure at the facility being followed and recorded regularly?	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the method used comply with the internationally accepted standards such as pasteurization, ultra high temperature (UHT) or sterilization?	<input type="checkbox"/>	<input type="checkbox"/>
ç) In the case that the food is kept at low temperatures; is the food immediately cooled to the temperature appropriate for health		

following the heat treatment process or after the final preparation stage, if any heat treatment has not been applied?	<input type="checkbox"/>	<input type="checkbox"/>
d) Is the dissolution of the frozen food performed at appropriate temperatures in a way to minimize the risk of reproduction of pathogenic microorganisms or the formation of toxins in food and not to pose any risk to health?	<input type="checkbox"/>	<input type="checkbox"/>
<b>H- PACKING AND PACKAGING</b>	<b>YES</b>	<b>NO</b>
a) Has the material used for packing and packaging been made of a material which is not a source of contamination?	<input type="checkbox"/>	<input type="checkbox"/>
b) Is there a space where the packing material will be stored in a way not to be exposed to the contamination risk?	<input type="checkbox"/>	<input type="checkbox"/>
c) For cans and glass jars used for packing and packaging transactions, is the integrity of the structure and the cleanliness of the containers ensured?	<input type="checkbox"/>	<input type="checkbox"/>
d) Has the reusable packing and packaging material used for food been designed in a way to be cleaned and disinfected easily where necessary?	<input type="checkbox"/>	<input type="checkbox"/>
<b>I- WASTE</b>	<b>YES</b>	<b>NO</b>
a) Have the food waste, by-products not consumed as food and other waste been disposed of quickly in order to prevent the accumulation of waste in environments where the food is situated?	<input type="checkbox"/>	<input type="checkbox"/>
b) Have the food waste, by-products not consumed as food and other waste been collected and stored in closable containers or by using an alternative system?	<input type="checkbox"/>	<input type="checkbox"/>
c) Have the containers in which the waste is collected been designed in a way to be cleaned and disinfected easily where necessary?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Have the waste stores been designed in a way to be kept clean and to provide protection from animals and insects where necessary?	<input type="checkbox"/>	<input type="checkbox"/>
d) Is all waste removed from the atmosphere in a hygienic manner according to the related legislation and in a way not to harm the environment? (direct or indirect source of contamination must be prevented).	<input type="checkbox"/>	<input type="checkbox"/>
<b>I- UTILITY WATER AND / OR ICE PRODUCTION</b>	<b>YES</b>	<b>NO</b>
a) Has the potable water or clean water been provided in order to eliminate the contamination on the outer surface of the food?	<input type="checkbox"/>	<input type="checkbox"/>
b) Has sufficient quantities of drinking water which is always ready to use been provided?	<input type="checkbox"/>	<input type="checkbox"/>
c) In the case of using clean water for the whole fishery products, have the facilities and procedures been created relating to the supply of clean water to prevent the contamination of food?	<input type="checkbox"/>	<input type="checkbox"/>
ç) When the impotable water is used for fire control, steam production, cooling and other similar purposes, have the necessary measures been taken in order to ensure the circulation of this water in a separate marked system as needed and to prevent the contact of impotable water with the potable water system and to prevent the mixing of impotable water into the potable water?	<input type="checkbox"/>	<input type="checkbox"/>

d) In the event that recycled water is used for processing or as a component, have the necessary measures been taken against the risk of contamination?	<input type="checkbox"/>	<input type="checkbox"/>
e) When the heat treatment is applied to the food in hermetically sealed containers, have the necessary measures been taken in order to ensure that the water used to cool the containers after heat treatment is not a source of contamination for the food?	<input type="checkbox"/>	<input type="checkbox"/>
f) Is the steam to be in direct contact with the food appropriate for health?	<input type="checkbox"/>	<input type="checkbox"/>
g) Have the necessary measures been taken against the risk of contamination of the food because of the steam to be in direct contact with the food?	<input type="checkbox"/>	<input type="checkbox"/>
ğ) Has the ice which is in direct or indirect contact with food been obtained from the potable water or clean water when it is used to cool the whole fishery products?	<input type="checkbox"/>	<input type="checkbox"/>
h) Has the ice been manufactured and treated in a way to be protected from the contamination and stored properly?	<input type="checkbox"/>	<input type="checkbox"/>
<b>J- PEST CONTROL</b>	<b>YES</b>	<b>NO</b>
a) Has the implementation of the control program against pests and rodents been initiated?	<input type="checkbox"/>	<input type="checkbox"/>
<b>K- SOCIAL AREAS (Staff, dressing-shower-WC-Visitor Preparation Room)</b>	<b>YES</b>	<b>NO</b>
a) Are there sufficient number of flush toilets which are connected to an effective drainage system?	<input type="checkbox"/>	<input type="checkbox"/>
b) Are there sufficient number of wash basins which are placed in an appropriate way and designed for cleaning hands?	<input type="checkbox"/>	<input type="checkbox"/>
c) Are there hot and cold water, hand cleaning materials and hygienic hand drying materials and the wastebin not controlled manually in the wash basins designed for cleaning hands?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Are staff locker and dressing areas large enough?	<input type="checkbox"/>	<input type="checkbox"/>
d)Are showers and toilets in sufficient quantity for the number of staff?	<input type="checkbox"/>	<input type="checkbox"/>
e) Are enough natural / mechanical ventilation schemes available in the staff toilet, showers and dressing rooms?	<input type="checkbox"/>	<input type="checkbox"/>
f) Have staff lockers been designed in a way to allow its arrangement in terms of quality, size and the hygiene?	<input type="checkbox"/>	<input type="checkbox"/>
g) Does the suitable protective clothing to be used by the personnel in working areas exist? (clothing, overall, boots, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
ğ) Does the staff working in areas where the food is subjected to the treatment take care of personal hygiene?	<input type="checkbox"/>	<input type="checkbox"/>
h) Have necessary measures been taken to prevent that the personnel who has a disease that can be carried by the food or who is the carrier of the said disease comes into contact with food or enters the areas where the food is processed?	<input type="checkbox"/>	<input type="checkbox"/>
<b>L- CLEANING AND DISINFECTION IN PRODUCTION AREAS</b>	<b>YES</b>	<b>NO</b>
a) Are cleaning and disinfection materials stored in a separate locked section where the food is not located and the responsible person has been designated?	<input type="checkbox"/>	<input type="checkbox"/>
b) Do chemicals used in the cleaning of equipment and transport containers comply with the principles of good practice?	<input type="checkbox"/>	<input type="checkbox"/>
<b>M- STORAGE ROOMS (Frozen (-18°C) and Cold (0- 4° C) Storage )</b>	<b>YES</b>	<b>NO</b>



a) Are there enough storage capacity for the storage of food at the proper temperature?	<input type="checkbox"/>	<input type="checkbox"/>
b) Are there appropriate cold stores with enough space to allow the storage of raw materials and processed materials separately?	<input type="checkbox"/>	<input type="checkbox"/>
c) Is the temperature of the store monitored regularly and recorded?	<input type="checkbox"/>	<input type="checkbox"/>
ç) Have raw material and component storage rooms been designed in a way to prevent the contamination, spoilage and putrefaction of the product?	<input type="checkbox"/>	<input type="checkbox"/>
d) Have raw materials, components, intermediate products and final products been kept at appropriate temperatures?	<input type="checkbox"/>	<input type="checkbox"/>

**To be filled in by the competent authority of the exporting country.**

I confirm that this establishment complies with the requirements of the Republic of Türkiye.

Name:

Signature, Title, and Official Seal

(Official Veterinarian/Official Inspector)

Date