

Remote Export Certification Guidance

(for low risk products)

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Executive Summary

The standard procedure for export certification is for the Official Veterinarian (OV) to attend in-person to conduct a physical inspection of the consignment prior to certification.

In limited or exceptional circumstances remote certification (where the certifier is not present to physically inspect the consignment in-person prior to certification) may be suitable.

Remote certification must only be performed in scenarios where high certification standards can be maintained.

This document builds on the existing [Royal College of Veterinary Surgeons \(RCVS\) guidance](#) and provides a decision tree outlining the framework for the use of remote certification.

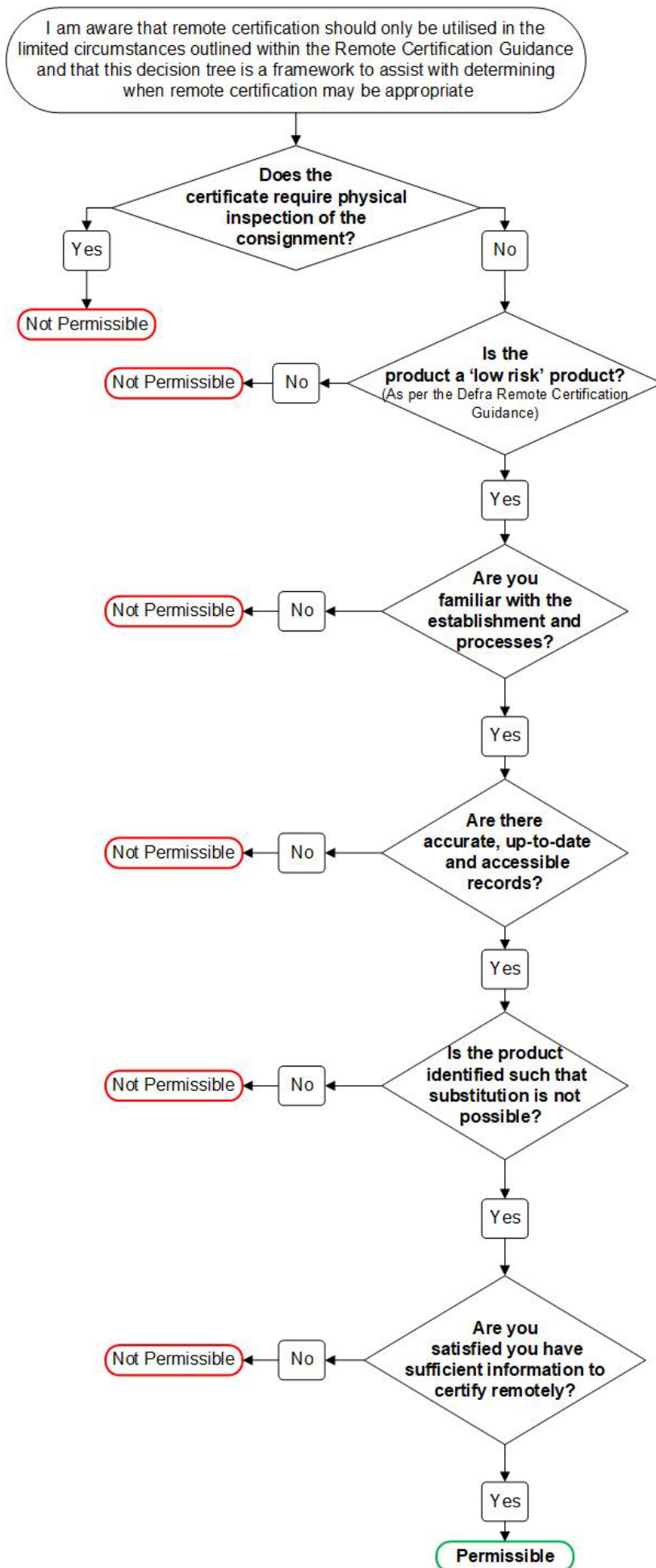
Decision Tree

This decision tree and accompanying guidance is provided as a framework for OVs to utilise when considering, on a case-by-case basis, whether to certify remotely (remote certification), or to attend the premises in person.

Where commodity specific guidance on remote certification is provided by RCVS or the Competent Authority (e.g. via official Notes for Guidance) this guidance must be followed and may supersede the generic guidance in this document.

Remote certification is not suitable in circumstances where the decision tree indicates this is not permissible.

Live terrestrial animals, germinal products and fresh meat are not suitable for remote certification.



Guidance to accompany the decision tree

Does the certificate require physical inspection of the consignment?

You must check the relevant certificate and notes for guidance to assess if a physical inspection of the consignment at the point of certification is mandated.

Is the product a 'low risk' product?

For the purposes of remote certification low risk products are defined as:

- shelf-stable products which have been subject to a controlled industrial process (e.g., shelf-stable milk powder). This treatment must minimise the animal and public health risks of the product (e.g., through heat treatment)
and/or
- products identified as suitable for remote certification in guidance from the competent authority (e.g., official Notes for Guidance)

A product falling within the above definition of 'low risk' is not automatically suitable for remote certification. You should continue to follow the decision tree.

Are you familiar with the establishment and processes?

You must be personally familiar with the relevant establishment(s) and processes being undertaken prior to agreeing to certify remotely. This must include:

- at least one initial thorough physical inspection of the establishment and relevant processes relating to the export of a representative sample of products
- spot checks (including in-person certification of relevant consignments and physical inspections of the establishment) must be carried out. You should determine the frequency of these spot-checks depending on risks however **the premises must be subject to a physical inspection by an OV at a maximum interval of every three months**. Evidence of the outcome of these checks must be retained for audit purposes
- a repeat physical inspection of the establishment should occur whenever you are made aware of significant changes to the site or processes. A physical inspection must also be undertaken if certification requirements change

In between physical inspections of the establishment, video inspections, photographic evidence and/or other records may be used to confirm that the establishment and processes continue to operate in the manner that you are familiar with. Evidence of these must also be kept for auditing purposes.

Are there accurate, up-to-date, and accessible records?

Accurate records must be available at the point of certification indicating the identity of the consignment in addition to sufficient supporting evidence to confirm compliance with certification requirements.

Records should include (as appropriate):

- records of establishment inspection/approval/registration/listing (as appropriate) from the relevant competent authorities (e.g., Food Standards Agency (FSA), Food Standards Scotland (FSS), Local Authority (LA))

- Hazard Analysis and Critical Control Points (HACCP) records
- any other records you consider appropriate (e.g., operational records, traceability records, relevant third-party accreditations)

Where reliance is placed on the exporter's (or food business operator's) own systems to provide identity information:

- you must be aware of and satisfied with the quality control systems in place to ensure accuracy
- you (or a Certification Support Officer (CSO) operating under your direction) must perform spot checks to confirm accuracy at a frequency you determine. You should keep a record of these spot checks for auditing purposes. This guidance does not change any of the existing policy on deployment of CSOs. CSOs must operate within the APHA policy for authorisation of CSOs.

Is the product identified such that substitution is not possible?

The product should be packaged and/or sealed in such a way that its identity and condition would not be expected to change before the anticipated date of dispatch.

The product should be identified by unique means of marking(s) (e.g., batch code, serial numbers, or shipping marks).

Are you satisfied you have sufficient information to certify remotely?

Whilst exporters may request to have their products certified remotely, the decision whether it is appropriate is the responsibility of the OV. You should assess the scenario in which you are being asked to certify remotely and decide if it appropriate for you to do so, using this guidance to support your decision.

You are under no obligation to certify remotely and if you are not content to certify remotely for any reason you should refuse to do so.

By certifying an official certificate, either remotely or in person, you may become liable for any incorrect information which you have certified.

If you have followed this guidance and are satisfied that a physical inspection of the consignment is not required, then you may choose to certify remotely.

Further guidance on remote certification is available in the [RCVS Code of Professional Conduct for Veterinary Surgeons](#).

You can also contact APHA for further advice if needed or to report any concerns.

Guidance for Official Veterinarians on remote supervision of official seals for EU exports

You must make sure you follow any specific guidance on official sealing provided by the relevant competent authority.

If the certificate or notes for guidance indicate that you (the OV) must personally be present at the time of applying the official seal, then remote supervision or delegation to a CSO is not appropriate.

For EU export of Products of Animal Origin (POAO), an 'official seal' is a seal which is 'affixed to the container, truck or rail wagon under the supervision of the competent authority issuing the certificate' (Implementing Regulation (EU) 2020/2235).

It is typically not a legal requirement for consignments of POAO to be officially sealed but this may be requested by exporters to facilitate checks at the point of entry into the EU.

Where all other requirements for remote certification are met, the supervision of the application of the official seal can be achieved either:

- a) by delegating the supervision to a CSO, provided they operate within the agreed policy on the deployment of CSOs. At minimum, CSOs must verify the identity of a random sample of the products in the consignment, witness the application of the seal and provide photographic or video evidence to the certifying officer of the consignment immediately prior to sealing and of the attached seal (with legible seal number). This guidance does not change any of the existing policy on deployment of CSOs. CSOs may be utilised to support administrative checks, but must operate within the APHA policy for authorisation of CSOs and they may not perform any tasks which require veterinary judgement

and/or

- b) via live video recording, through which you (the OV) must be able to identify a random sample of the goods in the consignment, witness the application of the seal and read the number of the seal applied

and/or

- c) by following guidance issued by the relevant competent authority (e.g., OVs certifying exports in Northern Ireland should follow guidance issued by the Department of Agriculture, Environment and Rural Affairs (DAERA)).



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