

# High risk food of non-animal origin

Some foods of non-animal origin are considered high risk food of non-animal origin (HRFNAO) because they pose health risks associated with the country of origin.

If you are moving goods under the NI Retail Movement Scheme please see [Northern Ireland Retail Movement Scheme: how to register and seal consignments on GOV.UK](#). The following guidance relates only to movements to NI that fall outside of the NI Retail Movement Scheme.

Products may be considered high risk if they contain, for example, contaminants such as [mycotoxins](#), [pesticides](#), [salmonella](#). When imported or moved into Northern Ireland (NI) from outside the EU, including from Great Britain (GB), food defined as high risk will be subject to either:

- temporary increased controls
- emergency measures

You can find an overview of all country specific requirements and the hazardous contaminant associated with each foodstuff on the [Foodstuffs with current restrictions](#) page.

Examples of HRFNAO include:

- groundnuts such as peanuts in shell from Bolivia or Madagascar
- dried grapes (raisins) from Turkey
- herbs such as coriander and basil from Vietnam

If you are moving HRFNAO into NI from outside the EU, it is your responsibility to think about the foods you trade, where they originate from and whether they are imported into GB prior to onward movement to NI (either as part of the consignment originally imported into GB or the full consignment). You can check your traded goods against those foods for which further restrictions apply, as set out on the [restrictions page](#). You can get more information from the Point of Entry (POE) you will be bringing your food consignment into, or the district council in the area your business is located.

FSA terminology explainer: What is a 'consignment'?

A consignment means a quantity of goods covered by the same official certificate, official attestation, or any other document, conveyed by the same means of transport and coming from the same country.

You also need to consider whether the ingredients in the foods you are moving are considered high risk. Certain food consisting of two or more ingredients may still be subject to HRFNAO requirements. Examples of such foods include confectionery, chocolate, bread, pastries, cakes and biscuits, that contain one or more HRFNAO ingredients listed in Annex II associated with a risk of aflatoxins. A list of affected foods can be found in [Table 2 of Annex II](#). If the high-risk ingredients are in excess of 20% of the final product, the food will be subject to import checks.

There are currently no HRFNAO which originate from GB. However, high-risk foods not of animal origin imported into GB and then transported to NI will be subject to controls in NI.

The legislative requirements in this legislation also apply to high risk feed. High risk feed movements are overseen by DAERA and you can find more information on [DAERA's animal feed](#)

[page.](#)

## **Movement of HRFNAO from GB and non-EU countries into NI**

Movements of HRFNAO to NI must meet the following conditions:

1. Businesses engaged in the activity of importing food need to [register as a food business](#) with their district councils and inform the district council that they are engaged in the activity of moving HRFNAO into NI. You can also [update your details](#) if you are already registered as a food business but have not indicated that you are engaged in the activity of importing food.
2. Ensure all food for human consumption moved into NI complies with EU food safety regulations and related requirements.
3. Enter Northern Ireland through a Point of Entry (POE) authorised to accept HRFNAO. You can find a [list of NI POE's on DAERA's website \(PDF\)](#).
4. District council staff conduct HRFNAO checks in NI at the POE.
5. Pre-notify the district council staff at the POE when your HRFNAO will arrive in NI using a Common Health Entry Document (CHED-D) on TRACES NT. This must be done at least 24 hours prior to the intended arrival of your consignment. TRACES NT is an online platform used to move certain products including food of animal origin and certain food of non-animal origin. You can find further information on using the platform in the DAERA guidance on registering on TRACES NT
6. Include the correct documentation with your CHED-D on TRACES NT:
  - for HRFNAO listed in Annex I the correct documentation, this includes commercial documentation (such as invoices and packaging lists that supports the information declared in Part I of the CHED).
  - for HRFNAO listed in Annex II, this includes an export health certificate (EHC) relevant to each consignment. The EHC is signed by an authorised officer of the local authority in GB from where the food is despatched. Defra have provided guidance on EHCs.

If you have imported a consignment of HRFNAO into GB, split this consignment and intend to move part of the original consignment to NI you will require new official certification for the consignment destined for NI. This may include a new certificate of analysis (CoA) from an official laboratory (it may take between 3-7 days for a laboratory to provide sampling results). Defra have been preparing for the Official Certification to occur in GB for such a scenario. Food businesses/importers should follow [Exporting or moving high risk food and feed of non-animal origin to the EU or Northern Ireland guidance](#) for details on how to get an official certificate.

If your consignment is part of a groupage consignment, that is a commercial grouping of multiple consignments within a single sealed trailer or container (e.g. a single vehicle collecting multiple distinct consignments from different suppliers, at different locations), then you should be aware of the [DAERA Groupage Guidance](#)

### **Step-by-step guidance**

Our [step-by-step checker on moving food of non-animal origin from GB to NI](#) will guide you through the requirements and the process.

Follow our guidance and video tutorial on how to create and complete a CHED-D for consignments of food and feed of non-animal origin:

- [Guidance on registering for TRACES NT and creating a CHED-D](#)

## Temporary increased controls

There are temporary increased controls for some HRFNAO from certain non-EU countries (including those imported into GB and moved into NI). This is due to a known or emerging risk, or because of widespread non-compliance with food law.?

You can find a list of the food of non-animal origin subject to a temporary increase of controls at points of entries in Annex I of the [relevant legislation](#). This list is reviewed at least twice a year.

For food that has these? [specific import requirements](#) the person responsible for the consignment must include commercial documentation (such as invoices and packaging lists that supports the information declared in Part I of the CHED) in your CHED-D.

## Emergency measures

Emergency measures are in place for a range of food commodities coming into NI if a food is likely to pose a serious risk to human health, animal health or the environment.

Annex II of the relevant legislation lists the foods from certain countries subject to special conditions for the entry into NI due to contamination risk by, for example mycotoxins including aflatoxins, pesticide residues, chemical, microbiological and other contamination e.g. unauthorised dyes, additives. This list is reviewed at least twice a year.

In addition, there are a number of emergency measures under other legislation with import conditions that are specific to each measure:

- **genetically modified (GM) rice from China** - GM rice from China cannot move into NI from GB and can only be imported directly from China into NI or via EU Member States (MSs)
- **food from Japan post Fukushima** - food from certain prefectures in Japan cannot be moved from GB to NI and can only be imported directly from Japan into NI or via EU MSs

You can find more details on common restricted foods from certain countries including China and Japan on the [NI import requirements for restricted food stuff page](#).

For foods with emergency measures you must have:

- Common Health Entry Document (CHED-D)
- Official certificate, also known as an export health certificate
- Certificate of analysis (CoA) (obtained from an official laboratory)
- commercial documentation (such as invoices and packaging lists or bills of lading)

If you want to move products from GB into NI, you can find out how to get the Export Health Certificate and Certificate of analysis in Scotland, Wales and England on the [GOV.UK website](#)

## Point of entry checks for HRFNAO

### Documentary checks

Documentary checks can be carried out, and the products cleared before the food products arrive at the point of entry (POE) into Northern Ireland. To avoid delays it is essential that all necessary documents are complete, accurate and submitted within the notification timelines. You must submit your CHED-D at least 24 hours before the arrival of your consignment to allow POE staff time to raise any errors with importers prior to the arrival of the product at the POE and therefore ensure a swift journey through the POE as possible. All HRFNAO is subject to a documentary check.

### Identity and physical checks

#### Identity check

This is a visual inspection to ensure that documents accompanying the food consignment match the labelling and the content of the consignment.

#### Physical check

A physical check is a check on food which may include checks on:

- the means of transport
- packaging
- labelling
- temperature

Sampling for analysis and laboratory testing may be done and any other check necessary to verify compliance with food law.

Identity and physical checks, including laboratory analysis, are undertaken at a frequency set down in the [relevant legislation](#) for the specific commodity being imported.

Please note that it can take 3-7 days for an official laboratory to provide sampling results for HRFNAO. During this period, the consignment will remain under customs control.