

**Veterinary Services Memorandum 594.1**  
**Export Certification of Animal Products**  
**Converted Adobe Version**

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The scan of the actual signed memorandum is available at:

[http://inside.aphis.usda.gov/vs/downloads/memos/594\\_1.pdf](http://inside.aphis.usda.gov/vs/downloads/memos/594_1.pdf)



## VETERINARY SERVICES MEMORANDUM NO. 594.1

United States  
Department of  
Agriculture

Animal and Plant  
Health Inspection  
Service

Veterinary Services

Washington, DC  
20250

**TO:** Veterinary Services Management Team (VSMT)

**FROM:** John R. Clifford  
Deputy Administrator  
Veterinary Services

**SUBJECT:** Export Certification of Animal Products

### I. PURPOSE

This memorandum provides Animal and Plant Health Inspection Service (APHIS) Veterinary Services (VS) personnel information about export certification of animal products.

### II. CANCELLATION

This memorandum cancels VS Memorandum No. 594.1, dated November 20, 2003.

### III. POLICY

Title 9, *Code of Federal Regulations* (9 CFR), part 156, establishes authority for reimbursable inspection and certification of animal products, and 9 CFR part 130 establishes user fees for endorsing export certificates and conducting inspections related to export. Hourly user fees should be charged for export-related inspections.

Under policies detailed below, VS verifies and endorses export certificates on a fee-for-service basis to meet the requirements of the importing country related to the mitigation of risk of introducing animal diseases.

### IV. REQUIRED TRAINING

The National Center for Import and Export (NCIE) has produced Web-based instruction related to product certification by VS personnel.

The Web-based training courses “Export Certification of Animal Products I” and “Export Certification of Animal Products II: Export of Animal By-Products to the European Union” provide detailed guidance for VS personnel to use when performing tasks related to the certification of products.

Completion of this training by the appropriate VS personnel increases their understanding and allows for consistency in the approval and verification processes of certificates issued



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by VS for product exports. VS staff who conduct export activities, including personnel in the following positions, must complete the current version of these courses before conducting activities related to the certification of products:

- Export document examiners (export clerks)
- Veterinary medical officers (VMOs) who conduct facility inspections for animal product exports
- VMOs who endorse export certificates for products
- Area Veterinarians in Charge (AVIC)
- Individuals who may temporarily serve in the above positions

The preceding courses are revised periodically. Once updated versions of the courses are announced, the above personnel must complete the new version as directed. The information in these courses supplements and further explains the content of this memorandum.

### **V. OTHER FEDERAL AGENCIES AUTHORIZED TO PROVIDE EXPORT CERTIFICATION FOR VARIOUS TYPES OF ANIMAL PRODUCTS**

Generally, VS does not endorse certificates for commodities certified by another Federal agency. These Federal agencies are indicated below.

If VS personnel have questions or concerns about endorsing a particular certificate, they should contact the Regional Import Export Coordinator (IEC) or NCIE products staff for guidance before taking further action.

#### **A. Dairy Products Exported for Human Consumption**

The USDA's Agricultural Marketing Service (AMS) and the U.S. Food and Drug Administration (FDA) both have authority for the certification of dairy products exported for human consumption. AMS is the main public health authority responsible for endorsing export certificates. VS personnel may be involved in endorsing export certificates for these products if:

1. The importing country requires VS certification; and/or
2. Certification includes animal health concerns such as:
  - a. The clinical health of the source animals;
  - b. The disease status of the United States or region of origin; or
  - c. Mitigations to prevent the transmission of animal diseases, e.g., heat treatment.

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VS personnel must check the International Regulation Retrieval System (IREGS) to determine if information has been provided regarding which agency is signing the export certificate. (IREGS is discussed in Section VI-D of this memorandum.)

If the IREGS does not indicate that VS certification is required for dairy products exported for human consumption, exporters will be referred to AMS for assistance. If after consulting with AMS, the exporter still requests endorsement by VS of a certificate for dairy products intended for human consumption, VS endorses if the certificate is consistent with all VS policies.

The contact information for AMS Dairy Standardization Branch is:

Dairy Standardization Branch  
Agricultural Marketing Service  
U.S. Department of Agriculture  
P.O. Box 96456  
Washington, DC 20009  
Phone: 202-720-3171 Fax: 202-720-2643

### A. Meat and Meat Products Exported for Human Consumption

USDA's Food Safety and Inspection Service (FSIS) is responsible for export certification of most meat and meat products exported for human consumption.

VS officials may not sign export certificates for quantities of meat greater than 50 pounds.

In some cases, VS may endorse certificates for meat products that are not covered by FSIS certification. If a product contains greater than 2 percent meat, the product is likely under FSIS certification. In these cases, VS may not issue certification unless the exporter provides documentation from FSIS that the product does not fall under FSIS certification responsibilities.

FDA may certify meat products that are outside of FSIS certification responsibilities.

When the following exceptions apply, VS may endorse export certificates for meat or meat products exported for human consumption:

1. Passenger baggage meat and meat products: VS may endorse VS Form 16-4, Export Certificate for Animal Products, when an international traveler has less than 50 pounds of meat or meat products in his or her baggage. No additional

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declarations may be included on VS Form 16-4, and the traveler must be advised in advance to check with the competent authority in the country of destination to determine if the meat will be allowed entry with no documentation other than VS Form 16-4 with no additional declarations.

2. Products not regulated by FSIS: VS may endorse certificates for meat and meat products confirmed to not be covered by FSIS certification responsibilities, if the certificates are consistent with all VS policies.

To receive information on FSIS import and export responsibilities, exporters may contact the FSIS Policy Development Division in Omaha, Nebraska, at 402-344-5000 or by fax at 402-221-7483. This office previously was known as the FSIS Technical Service Center. The FSIS export library is available at <http://www.fsis.usda.gov>.

To receive information on FDA export certificates for food products exported for human consumption, exporters may contact FDA at 301-436-2776 or visit the FDA Web site at <http://www.fda.gov>.

### B. Egg Products Exported for Human Consumption

FSIS is responsible for export certification of egg products (dried, frozen, or liquid eggs, with or without added ingredients). However, there are many exceptions.

FSIS is not responsible for export certification of some products that contain only a small percentage of egg. These products that do not fall under FSIS jurisdiction are under FDA jurisdiction.

VS may endorse certificates for egg products exported for human consumption if the products are not covered by FSIS certification responsibilities and if the certificate is consistent with all VS policies. Exporters must present evidence that the product is not covered by FSIS.

### C. Intestinal Casings and Rendered Animal-origin Fat

FSIS is responsible for certification of intestinal casings and rendered animal-origin fat (e.g., tallow and lard) exported for human consumption.

VS may not endorse certificates for intestinal casings or animal-origin rendered fats exported for human consumption. All export certificates for rendered fats

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intended for other purposes must include the word “inedible” in the product description on the certificate for VS to endorse.

**D. Aquaculture and Fish-origin Products**

The National Oceanic and Atmospheric Administration (NOAA), U.S. Department of Commerce, certifies fishmeal, fish oil, and certain other seafood products intended for human consumption. The FDA also certifies some seafood products, such as blocks of frozen fish.

Unless the IREGS indicates that a country requires a VS certificate for fishmeal or fish oil, exporters of fishmeal or fish oil should be referred to NOAA, regardless of the intended use of the fishmeal or fish oil.

Unless the IREGS indicates that a country requires VS certification for other fish-origin products exported for human consumption, exporters should be referred to NOAA and the FDA Office of Seafood for assistance.

If after consulting with NOAA and FDA, the exporter still requests endorsement by VS of a certificate for fish-origin materials, VS may endorse if the certificate is consistent with all VS policies.

Exception: VS may never endorse certificates for commercial shipments of fishmeal or fish oil to the European Union (EU).

Contact information for NOAA is:

National Marine Fisheries Service  
c/o Fish Meal Program Manager  
National Oceanic and Atmospheric Administration  
P.O. Drawer 1207  
Pascagoula, MS 39567  
Phone: 228-769-7402 Fax: 228-762-7144

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Contact information for the FDA Office of Seafood is:

Office of Seafood  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
Harvey W. Wiley Federal Building  
5100 Paint Branch Parkway, Room HFS-325  
College Park, MD 20740-3835  
Phone: 301-436-2300 Fax: 301-436-2601

E. Table (Shell) Eggs

AMS signs export certificates for table (shell) eggs exported for human consumption. Exporters wishing to export table eggs should be referred to:

USDA, Agricultural Marketing Service  
Poultry Division–Grading Branch  
P.O. Box 96456  
South Agriculture Building  
Washington, DC 20090-6456  
Phone: 202-720-4411 Fax: 202-690-3165

In some cases, VS has limited involvement in providing additional documentation related to the export of table eggs. These exceptions are listed on the IREGS.

F. Veterinary Biologics

The VS Center for Veterinary Biologics (CVB) endorses certificates for the export of certain veterinary biologics (vaccines, bacterins, antisera, diagnostic kits, and other products of biological origin produced under CVB approval). VS Memorandum No. 800.52 provides guidance regarding certificate endorsement by CVB.

Contact information for CVB is:

Center for Veterinary Biologics Inspection and Compliance  
Export Manager  
510 South 17th Street, Suite 104  
Ames, IA 50010-8197  
Phone: 515-232-5785

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VS Area Offices may not endorse export certificates for products licensed by CVB.

### VI. RESOURCES

Many resources are available to address questions or concerns related to the export of animal products.

#### A. VS Area Offices

VS Area Offices serve as the primary VS point of contact for exporters of animal products. VS field personnel use the information in this and other VS memorandums, online courses, and other resources listed in this section to address questions and concerns of U.S. exporters. VS Area Offices also serve as the primary VS contact with local and State government officials.

VS Area Offices are not the appropriate contacts for the following entities. If contacted by one of these entities regarding U.S. animal products, VS Area Offices must refer the entity as noted below:

1. APHIS International Services (IS) personnel: Refer to NCIE.
2. USDA Foreign Agricultural Service (FAS) personnel: Refer to NCIE.
3. Officials of foreign governments: Refer to NCIE.
4. Private importers in foreign countries: Advise the importers to ask their U.S. supplier to address their concerns.
5. Press or congressional officials: Follow Legislative and Public Affairs guidance.

When contacted by other U.S. government authorities on issues related to the export of animal products, VS Area Offices should check with their Regional IECs, NCIE, or both if they are unsure whether NCIE should handle the issue.

#### B. Regional Import Export Coordinator

The Western and Eastern Regions have Regional IECs. When VS personnel have questions or concerns related to product export that are not fully addressed by the other resources, the IEC may be able to assist.

IEC contact information is listed below.

Import Export Coordinator  
Eastern Region  
USDA, APHIS, VS  
Venture II Building, Centennial Campus  
North Carolina State University  
920 Main Campus Drive, Suite 200  
Raleigh, NC 27606  
Phone: 919-855-7250 Fax: 919-855-7277  
VS.ER.Import.Export@aphis.usda.gov

Import Export Coordinator  
Western Region  
USDA, APHIS, VS  
2150 Center Avenue, Bldg B, Mail Stop 3E13  
Fort Collins, CO 80526-8117  
Phone: 970-494-7400 Fax: 970-494-7423

C. National Center for Import and Export Exports Products Team

The NCIE Exports Products Team is responsible for negotiating with foreign governments on technical animal health and product export issues, formulating VS product export policies, administering various programs related to the export of animal products, and interacting with other U.S. and foreign government agencies on issues related to the export of animal products.

Below is the contact information for the NCIE Exports Products Team.

National Center for Import and Export Exports Products Team  
USDA, APHIS, VS  
4700 River Road, Unit 40  
Riverdale, MD 20737-1231  
Phone: 301-734-3278 Fax: 301-734-0571  
exportsproducts@aphis.usda.gov

When shipping or mailing materials, please address as noted at the following Web site: <http://inside.aphis.usda.gov/vs/downloads/products/fedexadd.pdf>.

D. International Animal Product Export Regulations

The IREGS contains information related to animal health certification requirements for animal products certified by VS. The IREGS is available at <http://www.aphis.usda.gov/regulations/vs/iregs/products>.

1. The certification requirements for some products are not listed on the IREGS. If requirements are not listed, VS Area Offices must advise exporters to have the importing party request the import requirements from the pertinent government authority in the country of destination. If necessary, the importing party may contact the local USDA FAS or APHIS IS office serving the country of destination for further assistance verifying import requirements. If VS Area Offices receive requirements inconsistent with information posted on the IREGS, they must forward the documentation to the NCIE Exports Products Team.
2. Countries may change their import requirements without notice. If an exporter claims that certification different than that which is on the IREGs is required for an export, VS personnel should provide details to their Regional IEC with a copy to [exportsproducts@aphis.usda.gov](mailto:exportsproducts@aphis.usda.gov). They should then wait for further advice from the Region or NCIE before endorsing. **Exporters are responsible for verifying that they have met all the import requirements of the receiving country prior to shipment.**
3. The IREGs may also indicate if an importing country has prohibited import of particular commodities. VS Area Offices may not endorse certificates for products the IREGS indicates are prohibited. If an exporter claims that an importer has an exemption to a prohibition listed on the IREGS, the VS Area Office should advise the exporter to have the importer obtain written verification of this exemption from the government of the importing country. The exporter then provides this documentation, including, if necessary, an English translation to the VS Area Office, which forwards it to the Regional IEC with a copy to [exportsproducts@aphis.usda.gov](mailto:exportsproducts@aphis.usda.gov) for further advice.

E. USDA Foreign Agricultural Service

USDA FAS has offices in most U.S. embassies overseas. Exporters and their importing parties may wish to contact these offices for help in determining import requirements or other issues associated with the export of animal products. VS Area Offices may not contact these offices directly. NCIE is the VS contact for USDA FAS regarding issues associated with the export of animal products. A directory of USDA FAS offices may be found at [http://www.fas.usda.gov/scripts/w/fasfield/ovs\\_directory\\_search.asp](http://www.fas.usda.gov/scripts/w/fasfield/ovs_directory_search.asp).

F. APHIS International Services

APHIS IS has offices in many countries. Exporters and their importing parties may wish to contact these offices for assistance in determining import requirements or other issues associated with the export of animal products. VS Area Offices may not contact these offices directly. NCIE is the VS contact for APHIS IS regarding issues associated with the export of animal products. A directory of APHIS IS offices may be found at <http://www.aphis.usda.gov/is/pages/isglobaldirectory.pdf>.

G. Animal Products Export Database

The Animal Products Export Database (APED) is a Lotus Notes database that provides immediate notifications from NCIE to the VS field for issues associated with the export of animal products. The APED is used to alert the VS field of new export requirements, trade bans, or policies.

The documents in the APED may not be shared outside of VS. Any exceptions are noted in the specific APED document.

Notifications of updates to the APED are sent to IECs and VS personnel in the following email groups:

VS Export Documentation  
VS Areas ER  
VS ERMT  
VS ER AVIC  
VS WR AVIC

Individuals involved in the export of animal products may ask their supervisors to request that Regional authorities add them to the appropriate group(s).

Individuals no longer involved in the export of animal products who wish to stop receiving notifications of APED updates may ask their supervisors to request Regional authorities remove them from the above email groups. NCIE cannot add or remove individuals from these email groups.

H. APHIS Intranet Information Dissemination Electronic Access System

The APHIS Intranet Information Dissemination Electronic Access (IDEA) system is an internal network that contains numerous resources including documents related to internal animal product export policies.

The IDEA system is accessed only on computers on the APHIS network at <http://inside.aphis.usda.gov/vs/idea.shtml>.

The section of the IDEA system related to the export of animal products is at [http://inside.aphis.usda.gov/vs/euprod\\_docs.shtml](http://inside.aphis.usda.gov/vs/euprod_docs.shtml).

Links from within the IDEA system may not be forwarded outside of APHIS.

VII. TYPES OF CERTIFICATES ENDORSED BY VS

VS endorses export certificates to meet the animal health requirements of the government of the importing country. VS does not endorse certificates, or certificates containing other statements, for any other purpose. (Exceptions are noted on the IREGS.) VS does not endorse product certificates for domestic commerce.

A. VS Form 16-4/VS Form 16-4A

VS Form 16-4 is only available for the certification of animal-origin products for export. Previously, VS Form 16-4 was a preprinted form with sections to be completed before endorsement. Currently, VS Form 16-4 is an electronic form with specific sections the exporter completes before submitting electronically to the endorsing VS Area Office. After reviewing, verifying, and adding certain other details, the VS Area Office prints the electronic form on VS Security Paper. VS Form 16-4A is a continuation page that is only used with VS Form 16-4.

B. Letterhead Certificates

Letterhead certificates are used when an importing country will not accept a VS Form 16-4 or when importing countries require animal health-related certification for non-animal origin products, e.g., grains.

C. Certificates for Registration Purposes

These certificates may be required by the importing authority to grant permission to the importer for import of future shipments. The requirements for these certificates are available on the IDEA system at [http://inside.aphis.usda.gov/vs/downloads/products/registration\\_certs.pdf](http://inside.aphis.usda.gov/vs/downloads/products/registration_certs.pdf).

## VIII. LOGISTICS OF CERTIFICATION

### A. User Fees

Services provided by VS Area Offices related to the certification of products for export are billed to the entity requesting that VS provide the service. User fees are listed in 9 CFR 130.

The APHIS Marketing and Regulatory Programs Business Services-Financial Management Division-User Fees Team maintains a User Fee Operating Procedures Manual that provides additional information related to APHIS user fees. This manual is available on the APHIS Intranet at <http://inside.aphis.usda.gov/vs/publications/ufmanual.pdf>.

For questions on APHIS user fees not covered in the user fee manual, VS personnel should contact the pertinent IEC.

### B. Submission of Certificate by Exporter

The exporter follows these steps when submitting an export certificate to VS for review and possible endorsement:

1. Reviews information available on the IREGS.
2. Ensures the prospective importer has confirmed with the pertinent animal health authority in the importing country that the certificate and all included content are required.
3. Consults with the local VS Area Office on the proper preparation (formatting) and submission of the certificate. The VS Area Office clarifies for the exporter which sections of the export certificate must be left for completion by the VS Area Office and the appropriate procedures for transmitting the certificate and billing information electronically.
4. Whenever possible, submits the certificate electronically to the VS Area Office. Certificates submitted in hard copy will require the VS Area Office to photocopy the certificate onto VS Security Paper before endorsement.

C. Review of the Certificate by the VS Area Office

When a certificate is received from the exporter, the VS Area Office explains to the exporter the review and finalization process, and reminds the exporter they should not ship until they have received the final endorsed certificate.

The VS Area Office reviews the certificate for formatting and content before preparing the certificate for endorsement. If any problems with formatting or content are found, the VS Area Office consults with the exporter on the necessary corrective steps before preparing the certificate for endorsement.

1. Formatting

- a. Page numbering: Each page of a certificate must be numbered following the format “Page X of Y” before endorsement.
- b. Text: No portion of the certificate may be hand written except for the signature and initials where required. The entire certificate must be legible.
- c. Multilingual certificates: Certificates in language(s) other than English must also include the English translation. VS does not verify the translation before endorsement. VS Area Offices that doubt the accuracy of the translation may require the exporter to provide documentation verifying the translation.
- d. Certificates may not contain typographical errors or serious grammatical or spelling errors.
- e. Certificates may not contain areas that have been covered with whiteout or ink blots. All corrections must either be done electronically before printing the certificate, or where electronic versions are not available, by typing a single strikeout text line through the section to be deleted.
- f. If a section on one page of the certificate is continued on another page, “See page X.” must be typed in the initial section (where X is the number of the continuation page). The continuation must start with “YYY continued” where “YYY” is the name of the section that is continued. For example, VS Form 16-4 has a section called “PRODUCT (type of product, quantity, unit of measure, and animal product species of origin).” If the required information will not fit into this section of VS Form 16-4, and the information is included on a VS Form 16-4A that is page 2 of the certificate, “See page 2” should be written in the “PRODUCT” box of VS Form 16-4. The additional information should be added to page 2 of the certificate under the words “PRODUCT (type of product, quantity, unit of measure, and animal product species of origin) continued.”

2. Sections of VS Form 16-4

- a. Port: The port where the consignment is scheduled to depart from the United States must be noted. The port must be located in the United States. "Any U.S. port" may be noted, unless the IREGS for the country of destination specifies otherwise.
- b. Date, Certificate Number, Signature of Endorsing Official, Typed Name, Title of Endorsing Official: The exporter must leave these sections blank.
- c. ADDITIONAL DECLARATION: The exporter must draft this section consistent with information available on the IREGS or where the IREGS does not contain relevant information, based on information the importer confirms is required by the importing country's pertinent animal health ministry. The exporter should be aware that the VS Area Office will require this section to be revised if it does not comply with VS policies.
- d. NAME AND ADDRESS OF EXPORTER: The exporter completes this section with the name and address of the exporting company. In some cases, the exporting company may not be located in the United States. In these cases, this section must indicate from which U.S. State the consignment is shipping.
- e. NAME AND ADDRESS OF CONSIGNEE: The exporter completes this section with the name and address (including country) to which the consignment is being shipped. This address must be outside the continental United States and U.S. territories.
- f. PRODUCT (type of product, quantity, unit of measure, and animal species of origin): The exporter completes this section with only the following information. The VS Area Office may not endorse a certificate that contains additional information in this section.

Type of Product: The type of product is not generally the brand name of product. For instance, "canned pet food" is a type of product. "Brand X Flavor Y" is not a "type of product."

Quantity: The exporter indicates the number of units in the consignment.

Unit of Measure: The exporter indicates the unit, e.g., 100-kg tote that the quantity modifies. For instance, if a consignment includes fifty 100-kg totes, the quantity and unit of measure together would be "fifty 100-kg totes."

Animal Product Species of Origin: The exporter indicates the animal species from which the product is derived. For example, if pet food contains mutton and beef, the species of origin are "ovine, bovine." When

the only ingredient of ruminant-origin is dairy, the exporter may note this, e.g., “bovine (dairy).”

No additional information may be included in this section. For example, the “type of product” cannot include terms such as “sterilized,” “U.S. origin,” or “foot-and-mouth-disease (FMD)-free.”

- g. **IDENTIFICATION:** The exporter must include sufficient information to identify the shipment, e.g., lot numbers, container numbers, or order numbers.
- h. **CONVEYANCE:** The exporter may include general information regarding the means of transport to the destination country, e.g., “ocean vessel.” However, some countries may require specific identification of the method of conveyance, e.g., flight numbers or ship names.

3. Sections of VS Form 16-4A

- a. **Page Number:** The exporter completes this section as “Page X of Y” where X is the page number, and Y is the total number of pages of the certificate. X should never be “1” as VS Form 16-4 would always be page 1.
- b. **Date, Certificate Number, Initials of Endorsing Official:** The exporter must leave these sections blank.
- c. **Body:** The exporter should type the text that did not fit in the pertinent section of VS Form 16-4. All text should be preceded by “YYY continued” where YYY is the section of VS Form 16-4 in which the text continues.

4. Sections of letterhead certificates: Letterhead certificates vary depending on the commodity and country of destination. The exporter must prepare the certificate consistent with the guidance included on the certificate, and if available, the IREGS.

5. Authority

- a. **Product type:** The VS Area Office confirms that the certificate does not come under another agency’s authority. Please see Section V, Other Federal Agencies Authorized to Provide Export Certification for Various Types of Animal Products, for more information including exceptions.
- b. **Purpose-Animal-origin products:** Declarations are generally limited to the animal health requirements of the government of the importing country.

Declarations may not be included for marketing, financial, or other nonregulatory purposes.

Declarations may also include the animal health requirements of countries other than the country of the consignee in certain circumstances. In cases where these circumstances may apply, exporters work closely with their importers to determine requirements before preparing the certificate.

(1) When the consignment is transiting other countries, declarations may be required to meet the animal health requirements of the country or countries of transit. This is especially common for consignments transiting the EU.

(2) When the consignee will re-export the product or its derivatives to a third country, declarations may be required to meet certain animal health requirements of the country of final destination.

c. Purpose- Non-animal-origin products: VS only endorses letterhead certificates for nonanimal-origin products that contain one or both of the following:

(1) Certification of the disease status of the United States, e.g., FMD has not been detected in the United States; and/or

(2) Certification that the material is not animal origin.

No additional declarations may be included, such as “X ingredient is plant-origin.” The only exceptions are noted on the IREGS.

d. Public Health Declarations: Under certain circumstances, VS may endorse certificates for products intended for human consumption. In these cases, consistent with Section V, Other Federal Agencies Authorized to Provide Export Certification for Various Types of Animal Products, VS may endorse certificates for products intended for human consumption.

Additionally, if a certificate contains references to public health, e.g., “Product is fit for human consumption” or “Product is safe to eat,” VS endorses only if the exporter provides documentation from a competent public health agency verifying the statement. In some cases, detailed on the IREGS, certificates for products exported for human consumption may require endorsement by both VS and AMS.

6. Verification of consistency of declarations with the IREGS: VS Area Offices must check the IREGS to confirm that if the product is listed, the certificate is prepared in full compliance with the IREGS, and that no known trade ban currently prohibits the export. VS personnel may not endorse certificates that contradict the IREGS except when all of the following apply:

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- a. The exporter claims a foreign country will accept documentation different from what is listed on the IREGS.
  - b. VS has not been notified by the foreign government that the alternative documentation will not be accepted. (To determine if VS has been notified by the foreign government that the alternative documentation will not be accepted, the VS Area Office forwards the alternative certificate and a description of the situation to their IEC with a copy to [exportproducts@aphis.usda.gov](mailto:exportproducts@aphis.usda.gov).)
  - c. The exporter has signed a statement acknowledging that:
    - (1) VS has advised that the documentation does not meet VS' understanding of the country's import requirements;
    - (2) The shipment may be refused entry, destroyed, and/or returned to the United States;
    - (3) VS will not likely gain release of the shipment; and
    - (4) If VS signs the export certificate, the exporter is shipping at his or own risk.
7. Verification of accuracy of declarations: The VS Area Office reviews the declarations included on the certificate for consistency with VS policies before endorsement. If the declarations do not comply with these policies, the VS Area Office explains the necessary corrective actions to the exporter and ensures these actions are taken before endorsement.
- a. Declarations that do not require additional verification are:
    - (1) Declarations about the animal health status of the United States, or some part of the United States, that are based upon VS surveillance programs. VS Area Offices consult with their Regional IEC if they have questions.
    - (2) Declarations that refer to VS regulations.
    - (3) General declarations that products were produced under the rules and regulations of the United States. These statements must apply to virtually all similar products in the United States, and there should be no reason to believe the statements are false. These statements may not refer to specific agency rules and regulations. Examples of general statements that may be endorsed without additional verification include declarations that materials are free for sale in the United States, materials were produced under a system of rules and regulations in place in the United States, and materials were legally imported into the United States.
  - b. Declarations that require documentation from the government of the country of origin of ingredients: When a certificate contains declarations that can only be verified in other countries, exporters must present lot-

specific certificates from the government of the country of origin verifying those declarations.

- c. Declarations that require laboratory reports: Any certificate that indicates a product has been tested or is “free” of something may not be endorsed until the test results have been verified. If a “negative” test result is implied or if a declaration indicates that a product is “free” of something, the endorsing official confirms that lot-specific laboratory reports are provided by the exporter to the VS Area Office. These laboratory reports are retained on file in the VS Area Office and do not become part of the certificate unless otherwise indicated in the IREGS. Laboratory reports must clearly support the pertinent declarations included on the certificate and relate to the specific lot of material being certified. Exporters must request their laboratories to provide reports that convey the results in a manner similar to the wording of the pertinent declaration on the certificate.
- d. Declarations based upon affidavits: Certain declarations may be endorsed based upon a notarized affidavit signed by an individual with first-hand knowledge that the declarations are true. For more information on these declarations and requirements for the affidavits, please see attachment 1.
- e. Declarations related to public health: Declarations referencing public health, e.g., “Product is fit for human consumption” or “Product is safe to eat,” must be supported by documentation from a competent public health agency verifying the exact statement. The exporter presents the documentation at least once every 365 days, and the VS Area Office keeps it on file. The documentation does not become part of the certificate.
- f. Declarations that require verification by annual inspection: Declarations not covered in items 6a-6e above are verified by annual VS inspection of the production facility. In some cases, inspection of the suppliers of the production facility is also necessary.
- g. Declarations that may not appear on VS certificates (even in product names and descriptions): Certain terms and references listed below and synonyms may not appear on any portion of a VS certificate, **except as noted on the IREGS**. VS Area Offices who may have exceptions should contact their IEC with a copy to [exportsproducts@aphis.usda.gov](mailto:exportsproducts@aphis.usda.gov) and await further guidance before endorsing.
  - (1) Genetically modified organisms or any reference to biotechnology.
  - (2) Residues, e.g., hormones, dioxins, or antibodies.
  - (3) References to source animals that have not been exposed to or consumed any substances.
  - (4) Specific references to non-VS government regulations.
  - (5) International standards including the World Organization for Animal Health and Codex Alimentarius.

- (6) Regulations of another country, e.g., “The product meets all the requirements of Regulation (EC) 222/9999.”
- (7) General labeling statements, e.g., “product is properly labeled” or “product labeling meets all U.S. requirements.” (**Note:** APHIS *may* certify statements that products are labeled a certain way, e.g., “The product is labeled “NOT FOR HUMAN CONSUMPTION.”)
- (8) “Born and raised” statements: Any statements indicating a product is derived from an animal born and raised in the United States.
- (9) “Approved” facility: APHIS may only endorse statements that export facilities have been approved under the following circumstances:
  - (a) APHIS approved the facility; or
  - (b) The facility can prove with a document from the appropriate government competent authority that the facility has been approved by another government agency.

D. Preparation by the VS Area Office of the Certificate for Endorsement

After verifying the certificate is formatted properly and contains only those declarations consistent with VS policies, the VS Area Office takes the following steps before endorsing.

1. Blank areas: The VS Area Office draws a single diagonal line through any blank areas of the certificate to prevent additional text from being added after endorsement.
2. Certificate number:
  - a. Assigning the certificate number: No two certificates may have the same certificate number. The VS Area Office follows a written standard operating procedure (SOP) for numbering certificates. The SOP produces certificate numbers that:
    - Are specific to the signing office and identify the State where the endorsing office is located. Generally, the numbers begin with the two-letter abbreviation for the State where the office is located. If a State has multiple offices endorsing VS certificates, an additional number or letter is added.
    - Reflect the current fiscal year.
  - b. Applying the certificate number: The VS Area Office types the certificate number onto each page of the certificate. VS Form 16-4 and VS Form 16-4A have a specific location to type the number. For letterhead certificates, the VS Area Office types the certificate number on the upper-right corner of each page, unless the certificate has a specific location for the number.

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Number stamps may be used to apply this number as long as the image produced is legible on the original and any copies.

3. Name and title of endorsing veterinarian: Only VMOs may endorse VS certificates. The VS Area Office types the name and title of the endorsing veterinarian onto at least one page of the certificate. The VS Form 16-4 has specific areas for this text. For letterhead certificates, the VS Area Office types this text below or next to the signature area, unless the page has a specific location for the text. Stamps may be used to apply this text as long as the image produced is fully legible on the original and any copies.
4. Adding information after the VS Area Office receives the certificate: Sometimes, a certificate may require information such as a container or flight number that is not available at the time the exporter transmits the certificate to the VS Area Office. In these cases, the exporter requests that the VS Area Office hold the certificate for endorsement until this information is available. Once the exporter gives the information to the VS Area Office, the VS Area Office types the information onto the certificate.
5. Printing the certificate onto VS security paper: **Blank VS security paper may not leave the VS Area Office.** VS Area Offices do not provide the security paper to exporters to complete before submission.
  - a. Electronic submissions: If a certificate was submitted electronically, the VS Area Office prints it using an office printer that has been loaded with properly oriented VS security paper. The paper is oriented so that the USDA seal is on the bottom of the front page. The back of the paper should be used for multipage certificates. If the office printer is not capable of automatically duplexing, duplexing is accomplished by printing one page at a time and reloading the printer.
  - b. Paper submissions: If an exporter cannot submit the certificate electronically, the VS Area Office photocopies the prepared certificate onto VS security paper. Again, duplexing is required for multipage certificates.

### E. Endorsing the Certificate

1. Dating the certificate:
  - a. Assigning the date: The VS Area Office dates the certificate with the date that it is signed. **Exception:** Exporters may request the VS Area Office date the certificate with the date that it arrives at the VS Area Office for

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evaluation. The exporter must make this request in the original transmission of the certificate to the VS Area Office.

- b. Applying the date: The date must be typed on each page of the certificate. VS Form 16-4 and VS Form 16-4A each have a specific location for the date. For letterhead certificates, the VS Area Office types the date onto the upper-right corner of each page below the certificate number, unless the page has a specific location for the date. Date stamps may be used to apply this date as long as the image produced is legible on the original and any copies.
2. Signing and initialing the certificate: The color of the ink used to initial and sign certificates must be different than the color of the ink used to print the certificate and must be visible on both the original and copies of the certificate. A stamp may not be used for either the signature or initials.
    - a. The endorsing veterinarian must be the same official whose name is typed on the certificate.
    - b. Line-outs: The endorsing veterinarian initials any section of the certificate that is lined-out, even if the exporter lined-out the statement before submission. Line-outs include both corrections on all certificates and “delete as appropriate” statements on letterhead certificates.
    - c. The endorsing veterinarian signs the certificate.
    - d. Location of the signature: VS Form 16-4 has a specific location for the signature. Letterhead certificates are signed in locations indicated on the certificate or the IREGS. Where no specific location is indicated, the endorser signs the bottom of the last page of the certificate.
    - e. Initials: The endorser initials each page of the certificate that is not signed. VS Form 16-4A has a specific location for the initials. The endorser initials next to the certificate number on pages of letterhead certificates that do not have specific locations indicated for initials or signature.
    - f. Embossing the certificate: Each VS Area Office has an embosser to crimp certificates. After signing the certificate, the endorser embosses each page of the certificate. Unless otherwise indicated on the certificate or the IREGS, the seal is embossed over the signature on pages that are signed or over the certificate number on pages that are only initialed.
    - g. VS Area Offices should not routinely add ink to the seal image on the certificate. Trading partners have been notified that the seal is a colorless impression in the certificate paper.

**F. Processing the Final Certificate**

1. Office copy: The VS Area Office makes a photocopy of the signed certificate for office records. Office personnel must copy both sides of multipage certificates. The VS Area Office maintains a filing system that allows it to easily retrieve the certificate based upon its number.
2. Exporter original: Only the original certificate is provided to the exporter. The exporter and VS Area Office arrange in advance the method for sending the signed original to the exporter, or when requested in writing by the exporter, an alternate recipient.
3. Exporter copies: The exporter is not provided any copies that are embossed, contain original signatures, or that are on VS security paper. VS Area Offices may, upon request of the exporter, provide one photocopy of the signed certificate. This photocopy is not on VS security paper, is not embossed, and does not bear an original signature. The photocopy should not show the image of the embossment on the original. For information on replacing a lost certificate, please see item G below.
4. Advisory: When the VS Area Office provides the completed certificate to the exporter, the VS Area Office reminds the exporter that countries sometimes change their import requirements without warning, and the exporter is responsible for working with their importer to confirm prior to shipment that the consignment will be allowed entry into the country of destination with the endorsed certificate. The VS Area Office also advises the exporter that no changes may be made to the original certificate after this point.

**G. Replacing Lost Certificates**

When an exporter reports a lost certificate, the VS Area Office photocopies the file copy onto VS security paper, duplexing multipage certificates. The VS Area Office then types on the upper-right-hand corner "THIS IS AN EXACT COPY OF THE ORIGINAL CERTIFICATE NUMBER X ENDORSED ON Y." (X is the certificate number, and Y is the date of the original signature.) If this sentence will not fit on the upper-right corner of each page of the certificate, an alternative location is used. The VS Area Office then signs the first page of the certificate below this statement and initials each additional page. The copy is then embossed in the same manner as the original. The VS Area Office photocopies the copy onto plain paper to retain as a file copy.

#### H. Amending a Previously Endorsed Certificate

Once a certificate has been endorsed and provided to the exporter, no one may alter the certificate. Even if the exporter returns the certificate to the VS Area Office, the certificate may not be altered. Only the VS Area Office that endorsed the initial certificate can amend a previously issued certificate using one of the following options:

1. Certificate reissue: Reissuing the certificate is generally the better option. The VS Area Office follows the steps below to reissue the entire certificate.
  - a. Every effort must be made to have the exporter return the original certificate to the VS Area Office. Once received, the VS Area Office writes “Canceled” across page one of the certificate and attaches it to the file copy. If the AVIC accepts as valid the exporter’s explanation for why it is not possible to return the original certificate within a reasonable amount of time, the certificate may be reissued without receipt of the original. In this case, the VS Area Office writes “Canceled” across page one of the office copy.
  - b. The exporter prepares a new certificate. The VS Area Office verifies the new certificate has the same identifying information for the materials being certified as the original certificate. If the certificate is being amended to change the shipment identification, the exporter must return the original certificate. The VS Area Office reviews the amended certificate under the same standards as the original. With the following exceptions, the reissued certificate is finalized following normal procedures. The reissued certificate is assigned a new number that is identical to the original certificate number plus “REISSUE.” For example, a certificate previously numbered “VA090002” would be reissued as “VA090002REISSUE.” The VS Area Office types the following text below the certificate number on page one of the reissued certificate: “This certificate replaces certificate number [insert number of original certificate] dated [insert date of original certificate.]” If this text does not fit below the certificate number, it is typed in the upper-right-hand corner of the certificate.
2. Certificate addendum: An addendum is a letter signed by the VS Area Office that modifies some portion of the original certificate.
  - a. The VS Area Office works with the exporter to prepare an addendum consistent with attachment 2 of this memorandum.
  - b. The VS Area Office reviews the addendum under the same standards as the original. Extreme care must be taken to not certify unverified

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information. For instance, VS does not sign an addendum that appears to attest to the exact amount of the shipment, **except** when the information appears below the affidavit-line on the addendum.

- c. The addendum receives the same number as the original certificate plus "ADDENDUM." For example, if the original certificate was numbered "VA090023" the addendum is numbered "VA090023ADDENDUM."
- d. The addendum is not addressed to a specific individual or agency. It is addressed "To Whom it May Concern."
- e. The addendum is finalized on VS security paper.
- f. Many countries will not accept a certificate addendum. VS advises exporters to have their importers confirm in advance that an addendum, rather than a reissued certificate, will be accepted.

### IX. FACILITY APPROVALS AND NUMBERS

Some trading partners require VS to assign numbers to approved facilities. In these cases, NCIE has developed guidance on VS procedures for exporting facilities to obtain the pertinent approvals. This guidance is available in other VS memorandums or on the IDEA system.

Only NCIE may assign a facility number related to the certification by VS of animal products for export. Once NCIE assigns a facility a number, the number remains with the specific facility permanently, even if the facility changes ownership or the facility withdraws from participation in the pertinent program. The number does not move with the facility if the facility moves to a new location. The number alone does not convey any approval. When an approval is granted, VS Area Offices notify facility management in writing, providing the details of the approval, including requirements to retain the approval. VS Area Offices also notify the facilities that the number may not be used for any purpose other than for use on the specific export certificates related to the approval.

Attachments

Attachment 1: Affidavit Based Declarations

I. SCOPE

For a declaration on a certificate to be endorsed on the basis of an affidavit, all of the following must be true:

- A. All declarations must appear below one of the following exact lines on the same page of the certificate (exceptions are noted on the IREGS):
  - 1. “This office has on file a notarized affidavit from [insert name of company here] verifying the accuracy of the statements below.”
  - 2. “This office has on file a notarized affidavit from [insert name of manufacturer here], the manufacturer, verifying the accuracy of the statements below.”
- B. The declarations must not include references to the disease status of the United States or any part of the United States.
- C. The declarations must be consistent with the IREGS, if the IREGS has a pertinent entry.

II. SUPPORTING DOCUMENTATION

The VS Area Office verifies the following documentation is present before endorsing an affidavit-based declaration. The VS Area Office maintains copies of all required documentation with the file copy of the certificate.

- A. A notarized affidavit must:
  - 1. Be typed, notarized (signed before a notary public), and dated within the previous 365 days.
  - 2. Contain the exact text of the affidavit-based declarations.
  - 3. Be on company letterhead and signed by an individual in a position of authority (e.g., owner, president, chief executive officer, or quality control manager) within the company who is qualified to verify the information provided.

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4. Contain a description of the individual's position within the company, which demonstrates qualifications to make or verify the statements and infers that the individual has first-hand knowledge that the declaration is true.
  5. State that the individual is authorized to represent the company in this manner.
  6. Contain the following statement above the signature: "I certify that the statements listed above are true to the best of my knowledge and belief."
  7. Contain the typed name and title of the signing individual below the signature.
- B. Exceptions where further documentation is required: Even if declarations appear under an affidavit line, additional documentation is required, consistent with Section VIII.C.7 of VS Memorandum No. 594.1, when declarations related to any of the following items appear on the certificate:
1. Laboratory reports;
  2. Public health statements; or
  3. Declarations that could only be verified outside of the United States. (For example, "The serum was derived from blood collected from clinically healthy animals that were born and raised in New Zealand, a country free of FMD.")
- C. When the exporter is not the manufacturer: If the exporter is not the manufacturer of the product, the affidavit must be signed by the manufacturer. Special procedures must be followed if the exporter wishes to omit the identity of the manufacturer from the export certificate. These procedures are explained on the IDEA system at [http://inside.aphis.usda.gov/vs/downloads/products/affidavit\\_exporter\\_not\\_manufacturer.pdf](http://inside.aphis.usda.gov/vs/downloads/products/affidavit_exporter_not_manufacturer.pdf).

Attachment 2: Example of a Properly Formatted Certificate Addendum (Before Transferring to VS Office Letterhead and VS Security Paper)

VA090023ADDENDUM  
January 30, 2009  
Page 1 of 1

To Whom it May Concern:

This is an addendum to Certificate VA090023 dated January 5, 2009.

Where the Additional Declarations reads, "The products described below were heated to a minimum temperature of 80 degrees Celsius for a minimum of 5 minutes," it should read, "The products described below were heated to a minimum temperature of 90 degrees Celsius for a minimum of 5 minutes."

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Signature of Endorsing Official

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Typed Name

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Title of Endorsing Official