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Composite Products Guidelines Subject to Veterinary Controls in Turkey

Report Categories:

Policy and Program Announcements

Dairy and Products

Agricultural Situation

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Report Highlights:

Within the scope of Turkey's harmonization period to be an EU Member, Turkey published an implementing regulation **concerning lists of animals and products to be subject to veterinary controls at introduction into the country** to harmonize with the EU Commission Decision 2007/275/EU (GAIN report dated 4/22/2016 No: TR6020 [here](#)). Recently, Turkey's Ministry of Food, Agriculture and Livestock (MinFAL) announced the revised guidelines regarding controls of certain **composite products** and products which could be considered as composite products in line with EU implementation. The guideline will be distributed to custom control points- *veterinary border inspection posts (VBIP)* - in Turkey. This instruction will enter in force on August 15, 2016.

General Information:

After publishing the implementing regulation on concerning lists of animals and products to be subject to veterinary controls at introduction into the country, veterinary border inspection posts (VBIP) (*or province directorates which have authorization to conduct veterinary controls at the borders if there is no VBIP in the region*) have been struggling with veterinary controls of animal products on which products should be considered as composite products, or subjected to veterinary health certificate. With this new guideline, MinFAL aimed to clarify and reduce confusion for veterinary controls for those products by veterinary staff working at borders.

This document should help clarify the situation for U.S. products exported to Turkey and give guidance on export conditions of certain composite products containing processed products of animal origin and plant products as well as for products containing different products of animal origin and for products containing unprocessed products of animal origin and plant products.

Definition of Composite Product

Turkey defines composite product as a foodstuff intended for human consumption that contains both processed products of animal origin and products of plant origin and includes those where the processing of primary product is an integral part of the production of the final product.

Also it is defined that the below combinations *are not considered as composite products*;

1. A non-processed product of animal origin associated with a product of plant origin and placed on the market as such (e.g. skewer containing fresh meat/fish and vegetables)
2. Products not intended for human consumption (e.g. canned tuna fish with corn for pet food)
3. Products of processed animal origin if no products of plant origin are included. (e.g. aquaculture products as fish sauce obtained from fermentation of a mixture of fish, salt and water. Dairy product as yogurt drink obtained milk powder and sugar. They do not contain any plant ingredient required to be composite products.)

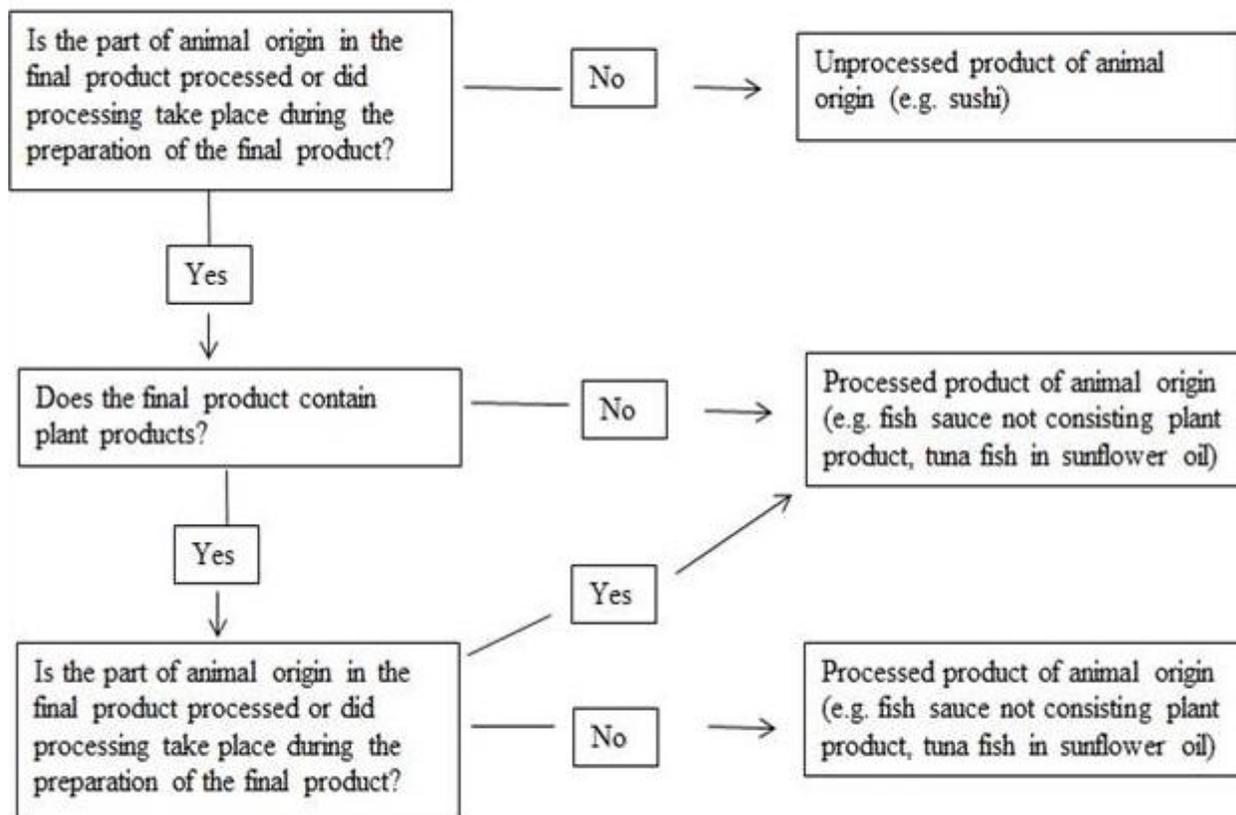
Products of processed animal origin containing plant ingredient

Adding plant ingredient into product of processed animal origin does not always mean that the final product is a composite product. If plant ingredient is necessary for production process of processed animal origin product or plant ingredient in question adds special characteristics to final product; the final product *is not* a composite product but is considered as a product of processed animal origin. For example;

1. Cheeses to which herbs are added or yogurts to which fruit is added remain dairy products.
2. Sausages to which garlic or soya is added remain meat products.
3. Tuna fish to which sunflower oil is added for the purpose of can production technology remains aquaculture product.
4. Surimi to which plant ingredient is added to give specific characteristics remains aquaculture product.

5. Chicken nugget breaded for adding specific characteristics (flavor, texture) remains meat product.
6. Canned beef to which glucose or onion in small quantity is added for adding specific characteristics remains meat product.
7. Milk puddings to which fruit sauces are added for adding specific characteristics (flavor) remains dairy product.
8. Breaded cheese for adding specific characteristics (flavor, texture) remains dairy product.

Decision tree to distinguish composite product from products of animal origin



A non-exhaustive list with examples of processed products of animal origin is detailed in Annex 1 to this report.

Products of unprocessed animal products and plant products

A non-processed product of animal origin associated with a product of plant origin is considered as a non-processed product of animal origin, for example:

1. Skewer containing fresh meat and vegetables,
2. Preparations of fresh fishery products with food of plant origin,
3. Honey with nuts (Honey is not processed and the final product is not processed/ not heated),

4. Uncooked pastry with fresh meat.

Combinations of products of animal origin

Food products which contain different products of animal origin, independently on whether they are unprocessed or processed, are not considered to be composite products if no products of plant origin are included. For example;

1. Fish ball with very small amount of egg white used as thickener,
2. Skewers with meat marinated in yoghurt, milk,
3. Surimi to which very small amount of egg white is added for technological reasons,
4. Steak presented in a package with a piece of butter,
5. Whole fish, ready to cook, presented with a meat stuffing,
6. Sushi decorated with egg products.

Assessment of whether composite products are subjected to veterinary controls or not

The commodities which are not in Annex I of Turkey's implementing regulation on **concerning lists of animals and products to be subject to veterinary controls at introduction into the country** (also see the GAIN report dated 4/22/2016 No: TR6020 or click [here](#)) should not undergo veterinary checks.

The following composite products shall be subject to veterinary controls:

1. Composite products containing processed meat product.
2. Composite products containing half or more of their substance of any one processed product of animal origin other than processed meat product.
3. Composite products containing no processed meat product and less than half of their substance of processed milk product where the final products do not meet the requirements defined by specific national legislation.

The legislation refers to "any one processed product of animal origin other than processed meat product" contained in a composite product, which means that there can be more than one processed product of animal origin in a composite product. In this case, all processed product of animal origin ingredients need to be summed up to know if the total amount of contained processed product of animal origin is 50 percent or more in the composite product and therefore the relevant composite product is subject to a veterinary control.

In addition, the legislation provides derogation for composite products which are shelf stable at ambient temperature or have clearly undergone in their manufacture a complete cooking or heat treatment process throughout their substance and are not containing any meat products but containing less than half of their substance of any one processed product of animal origin other than processed meat product. In this case, heat treated throughout the substance should be enough so that any raw product is denatured. Mild heat treatment such as pasteurization is not considered effective method for denaturation.

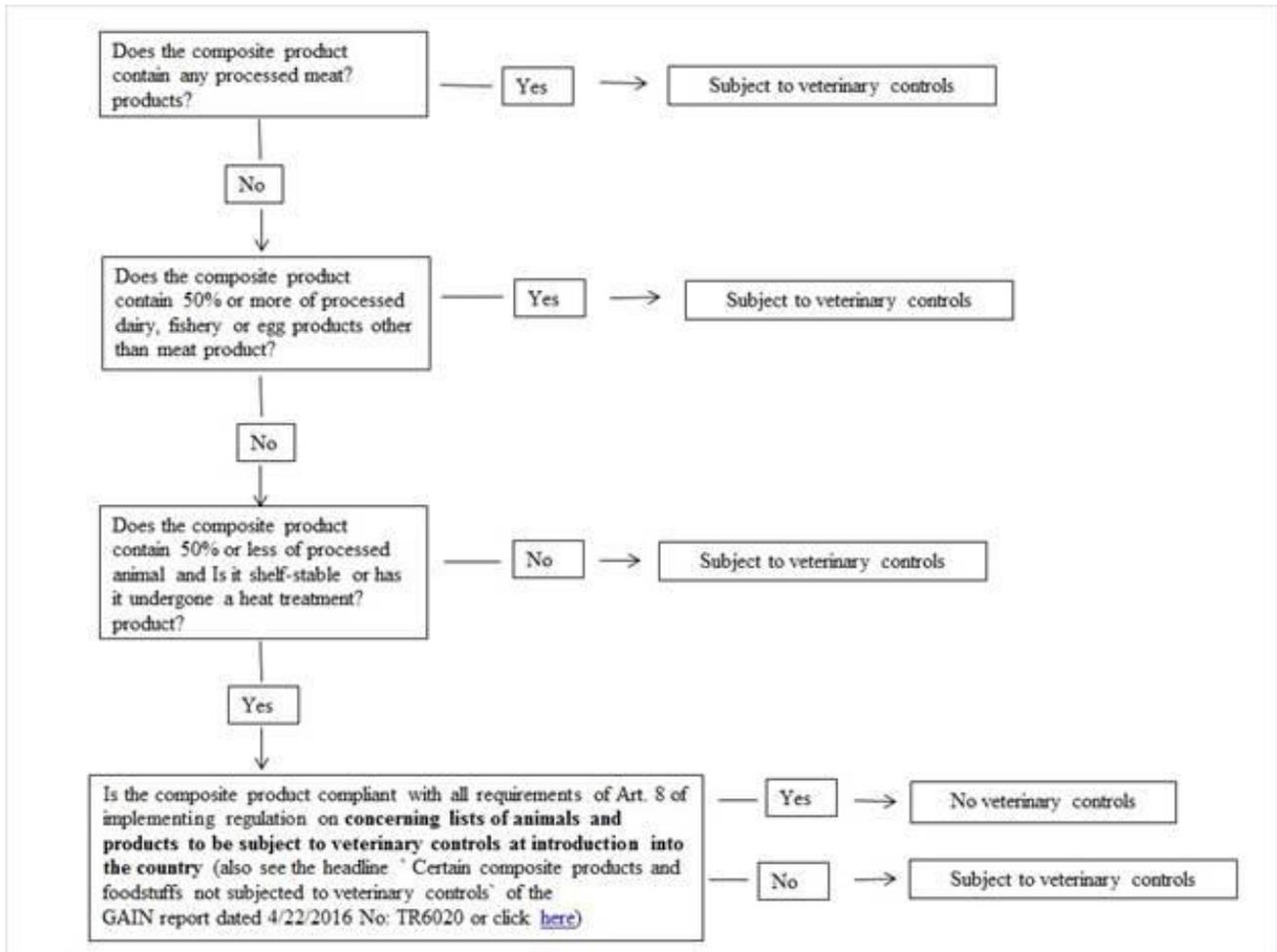
Composite products listed in Annex II of Turkey's implementing regulation on **concerning lists of**

animals and products to be subject to veterinary controls at introduction into the country (also see the GAIN report dated 4/22/2016 No: TR6020 or click [here](#)) do not need to be subject to veterinary checks. However if final composite product not subjected to veterinary controls is treated further with treatment such as adding cream to cake, the product might be under veterinary controls.

Decision tree for composite products subject to veterinary controls or not

The following documents are requested from producers/exporting country while the decision is taken whether product is subjected to veterinary controls or not:

1. Percentage of each product of animal origin
2. Details of production process of composite product (the points that animal ingredients are added to the product, following heat treatment especially heat-time details and work plan flow showing core temperature reached)



Annex 1 –

A non-exhaustive list with examples of processed products of animal origin.

According to the instruction; processed products are obtained by any action substantially changing the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.

Processed products of animal origin include:

- Meat products (e.g. ham, salami)
- Processed fishery products (e.g. smoked fish, marinated fish, surimi etc)
- Dairy products (e.g. heat treated milk, cheese, yoghurt)
- Egg products (e.g. egg powder)
- Rendered animal fat
- Greaves
- Gelatin
- Collagen
- Treated intestines, stomachs and bladders etc.
- Combinations of processed products, e.g. cheese with ham
- Products that have undergone several processing operations, e.g. cheese from pasteurized milk.

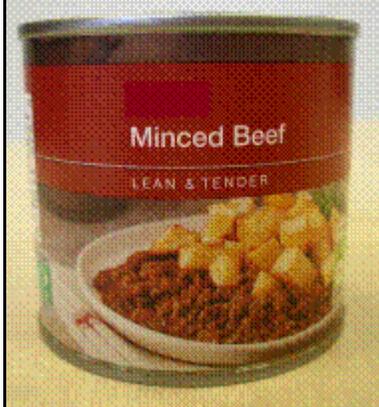
Substances to give special characteristics (e.g. flavor, sweetness, color, texture) or for technical purposes may be added, for example:

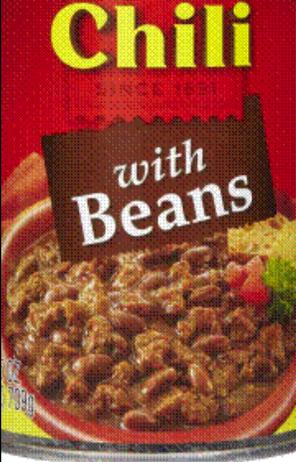
- sausage with garlic
- yoghurt with fruit
- cheese with herbs or breaded cheese
- dairy ice cream with chocolate
- canned fish fillet in oil
- cooked mussels with garlic butter
- surimi with egg parts
- fried battered fish

Additionally the instruction gives examples of composite products and processed products of animal origin:

Picture	CN code	Product information	Comments
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		1604 14 11	Tuna steak Ingredients: Tuna fish, sunflower and salt.	Not considered as composite product since it is aquaculture product. Subject to veterinary controls.
		1604 15	Mackerel in tomato sauce Ingredients: jack mackerel, tomato sauce, water and salt	Not considered as composite product since it is aquaculture product. Subject to veterinary controls.
		1904 90 10, if fish content is less than 20% 1604 (frozen or not), if fish content is more than 20%	Sushi Ingredients: fish, sushi rice, palm leaves, and others.	Not considered as composite product since it contains raw fish. Subject to veterinary controls.
		1604 20 10	Salmon salad Ingredients: pink salmon, sweet and sour sauce (tomato sauce, water, vinegar, soybean oil, sugar, modified starch, salt), tomato, sweet corn, onion, green pepper, baby corn, flavor,	Composite product, Not subject to veterinary checks as less than 50 % fishery products and shelf-stable

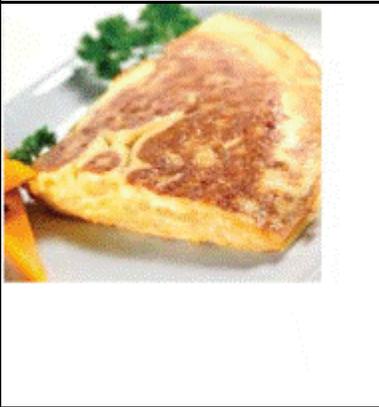
		enhancer (E621), paprika color (E160c)	
	1602 50 31	Canned Beef Ingredients: cooked beef, salt, sugar, water and preservative (Sodium Nitrite – E250)	Meat product, Subject to veterinary checks
	1602 50 95	Canned Minced Beef Ingredients: beef, water, wheat flour, beef extract, salt, corn flour, sugar, natural color (plain caramel), natural onion flavor, maltodextrin and white pepper	Meat product as the plant ingredients just add special characteristics; Subject to veterinary checks
	1902 20	Beef Lasagne Ingredients: cooked minced beef, vegetables and pasta with a béchamel sauce topping containing milk and cheese.	Composite product, Subject to veterinary checks as it contains meat product

	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Canned Chili with beans, Ingredients: water, beef, beans, concentrated crushed tomatoes, corn flour, textured vegetable protein (soy flour, caramel color), salt, chili powder, flavoring, sugar, starch, spices, green chiles, onions, jalapeno peppers.</p>	<p>Composite product, Subject to veterinary checks as produced from raw beef.</p>
	<p>1604</p>	<p>Frozen Fried Fish Balls, Ingredients: fish fillet, water, starch, red curry past, sugar, salt, flavor enhances, lime leave, egg white powder, phosphate</p>	<p>Fishery product as produced from raw fish and plant ingredients add special characteristics. Subject to veterinary checks</p>
	<p>2106 90 98</p>	<p>Paneer Cheese, frozen Ingredients: cheese coated with bread crumbs</p>	<p>Dairy product, as bread crumbs add special characteristics; Subject to veterinary checks</p>
	<p>2106 90 98</p>	<p>Paneer Bhurji Roll, frozen, filled with vegetables. Final product has not been cooked.</p>	<p>Composite product, Subject to veterinary checks, even if it contains less than 50% milk product as cheese is fresh (not shelf stable at ambient</p>

			temperature).
	1602 32	Chicken en croute, cooked and frozen: Ingredients: cooked chicken, puff pastry, mango, sugar, pak choi, palm oil, spices.	Composite product, Subject to veterinary checks as it contains meat.
	1602, if meat content is more than 20% 2106, if meat content is less than 20%	Hamburger with beef burger, cheese, tomato and salad	Composite product, Subject to veterinary checks as it contains meat.
	1605	Breaded King Prawns	Fishery product, as the prawns are raw, Subject to veterinary checks
	1603 00 10	Granulated Chicken Bouillon	Composite product, but not subject to veterinary checks as in Annex II to implementing regulation on concerning lists of animals and products to be subject to veterinary controls at introduction into the country (also see Annex II of the

			GAIN report dated 4/22/2016 No: TR6020 or click here)
 <p>Contains two sachets of cod roe seasoning and two packets of dried seaweed Shelf stable</p>	2103 90 90	Sauce Cod Roe: Ingredients of sauce packet: salted cod roe; shortening (canola oil, palm oil), salt, monosodium glutamate, sugar, hydrolysed protein (soybean, wheat, corn, fish), cochineal extract, disodium guanylate, disodium inosinate, lactose (milk)	Composite product, Not subject to veterinary checks, as shelf stable at ambient temperature and less than 50% of processed product of animal origin.
	2105 00	Vanilla flavored ice cream with wafer and hazelnuts Ingredients: water, sugar, milk solids, refined palm kernel oil, glucose syrup, hazelnuts, emulsifier, stabilizers, artificial flavoring, chocolate compound, wafer	Composite product, as it contains less than 50% of processed product of animal origin, not shelf stable. Dairy product and pasteurization is not enough to denature processed animal ingredients in the product.

	2103 90 90	Fish sauce: Can be obtained from fermentation of a mixture of fish and salt (and water).	Not considered as composite product since it is aquaculture product. Subject to veterinary controls.
	2103 90 90	Flavoring containing fish sauce and water	Fishery product, Subject to veterinary checks, It would be a composite product, if also vegetable parts are added. Adding only water does not make it a composite product.
	2106 90 92	Tablets, not packaged for the final consumer Ingredients for each tablet: Glucosamine sulphate (wild fish origin), Chondroitin (poultry origin), consist of plant materials.	Composite product, Subject to veterinary checks
	1602	Marinated and grilled meat skewer Ingredients: meat marinated in yoghurt, milk, salt, spices, olive oil	Meat product, Subject to veterinary checks

	<p>1604, if fish content is more than 20%</p> <p>2106, if fish content is less than 20%</p>	<p>Gefilte fish in a glass with gelatinous clear liquid:</p> <p>Ingredients: water, carp, egg whites, white fish, mullet, sugar, carrots, salt, cottonseed oil, onion, pike, potato starch, carrageenan, pepper, natural flavorings</p>	<p>Fishery product</p> <p>Not considered composite product as it is produced from raw fish and plant ingredients add special characteristics.</p> <p>Subject to veterinary checks</p>
	<p>1901 90</p>	<p>Powder product for omelet</p> <p>Ingredients: milk proteins, egg white powder, egg powder, salt, aromas, herbs, dye, spices, anti-caking</p>	<p>Mixed product of animal origin (dairy product and egg product),</p> <p>Not considered composite product as plant ingredients add special characteristics.</p> <p>- Subject to veterinary checks</p>
	<p>1602, if meat content is more than 20%</p> <p>2106, if meat content is less than 20%</p>	<p>Meat salad</p> <p>Ingredients: meat sausages, eggs, onions, pickles, parsley, dressing (mayonnaise type)</p>	<p>Composite product,</p> <p>Subject to veterinary checks as it contains meat product</p>

	<p>1901, as it contains vanillin</p> <p>0402, if it would not contain vanillin</p>	<p>Dulce de Leche</p> <p>Ingredients: low fat milk (49%), sugar (48%), vanillin (2%), Sodium bicarbonate (Baking Soda 1%) and potassium sorbate as a preservative (less than 1/10 of 1%)</p>	<p>Dairy product, as plant ingredients add special characteristics; Subject to BIP checks,</p>
	<p>2309 10</p>	<p>Tuna with corn,</p> <p>Canned pet food</p>	<p>Pet food, which is an animal-by product and subject to veterinary checks. Composite products cover only food for human consumption and the rules are not relevant to animal-by products.</p>