Exporting cell-cultivated products from GB to non-EU countries

Summary

Cell-cultivated products (CCPs) made from animal cells are considered to be Products of Animal Origin (POAO) for regulatory purposes, consistent with published FSS and Food Standards Agency (FSA) guidance, although this classification is not explicitly specified in legislation.

This guidance explains the steps you should take to export cell-cultivated product POAO from GB to non-EU countries. It signposts further information to help you through the process. We recommend that you also read the full step-by-step guide on exports from UK

This guidance describes the process for exporting cell-cultivated products (CCPs) derived from animal cells from Great Britain (England, Scotland and Wales). References to the UK are used where relevant requirements apply across all UK nations. As different regulatory requirements may apply in Northern Ireland under the Windsor Framework, if you are a business intending to export CCPs from Northern Ireland you should seek advice on the requirements that apply to your circumstances.

CCPs do not currently benefit from internationally recognised sanitary and phytosanitary classifications or established export certification arrangements. Consequently, unlike many traditional animal-derived products, there are no standard export certificate templates specifically for CCPs. While this process map draws on the requirements that typically apply to Products of Animal Origin (POAO), CCP export applications are likely to be assessed on a case-by-case basis and may require engagement with destination country competent authorities to determine the applicable import, certification and market access requirements.

The process map relates to CCPs exported from GB for placement on the market in non-EU jurisdictions. Depending on the destination country's regulatory framework, placement on the market may require a novel food authorisation or another form of pre-market approval.

Regulatory classification

Cell-cultivated products are not defined as 'meat'. For regulatory purposes, FSS and the FSA considers CCPs derived from animal cells to fall within the scope of Products of Animal Origin (POAO), although Regulation (EC) 853/2004 does not explicitly classify them as such.

FSS and the FSA published this position in December 2025, in Cell-cultivated products: guidance on classification and HACCP principles. It applies to products regulated in Great Britain. Countries you export to may apply different classifications for their own import controls and market access.

When you harvest cell-cultivated biomass (cells harvested from the bioreactor), you process it. This means cell-cultivated products count as processed POAO or composite products. FSS and the FSA published this position in July 2026, in Cell-cultivated products: food business hygiene requirements.

Legislation

The main UK regulations that apply are:

- Regulation (EU) 2015/2283 - Novel Foods
- Regulation (EC) 853/2004 - Hygiene of Foodstuffs of Animal Origin
- Regulation (EC) 852/2004 - General Hygiene of Foodstuffs
- Regulation (EC) 178/2002 - General Food Law
- Regulation (EU) 2017/625 - Official Controls
- Trade in Animals and Related Products ("TARP") Regulations 2011 (SI No.1197/2011)
- Trade in Animals and Related Products (Scotland) Regulations 2012 (SSI 2012 No.177)
- Trade in Animals and Related Products (Wales) Regulations 2011 (SI No. 2011/2379)

Process map: exporting cell-cultivated POAO from Great Britain (GB) to non-EU countries

This process map outlines the steps you should take to export cell-cultivated products produced in Great Britain (England, Scotland and Wales) to other countries. Different requirements may apply if you're exporting from Northern Ireland under the Windsor Framework, and different requirements apply depending on whether you're exporting to EU, Northern Ireland or non-EU countries.

Import requirements for cell-cultivated products are evolving internationally and vary between countries. You should always check current requirements with the competent authority in your destination country before you export.

This document is intended to provide an indicative overview of potential export requirements and processes. It is not a substitute for the relevant legislation, official guidance issued by competent authorities, or independent legal advice. In the event of any inconsistency between this document and applicable legislation or destination-country requirements, the legislation and destination-country requirements shall take precedence.

Export pathways for these products are still being developed and tested, so some steps may change as we gain experience and export systems become established. Following this process does not guarantee that you'll be able to export, that certification will be available, or that your destination country will approve the import of your product. Export requirements depend on the laws and import conditions of your destination country, and on decisions made by the relevant competent authorities.

As the export pathways for CCPs are tested, feedback from industry on this guidance will help us to refine and update it where necessary. Please contact exported.food@food.gov.uk if you have any information you feel would be useful to add to the process map.

STEP 1: CHECK DESTINATION COUNTRY ELIGIBILITY AND MARKET ACCESS

You and the importer at your destination country must work together to check whether you can import cell-cultivated products into that country.

Confirm that your destination country accepts cell-cultivated products. Compliance with UK law does not create a right to export. In GB, we classify cell-cultivated products as POAO, which aligns to current EU classification. Other countries may classify cell-cultivated products differently.

When you're checking this, consider:

- whether cell-cultivated products are permitted for import and sale
- how your destination country classifies cell-cultivated products for import purposes
- whether the destination country has published official import conditions
- whether market access arrangements exist

You can find exporting country guides online.

You can also submit an export enquiry online.

Market access must be established for exports to take place. Businesses may initiate requests for market access, while formal negotiations on import requirements are generally conducted between the competent authorities of the exporting and importing countries.

Where market access for cell-cultivated products has not yet been established, contact the Animal and Plant Health Agency (APHA) Centre for International Trade at Get help with animal and plant health - GOV.UK. They can advise you on whether you need government-to-government engagement to clarify import conditions.

Related guidance:

Get help with your export query - GOV.UK



STEP 2: CONFIRM GB ESTABLISHMENT ELIGIBILITY

You must ensure that your GB-based production establishment complies with applicable Great Britain food law requirements, as well as any requirements imposed by the destination country. In Great Britain, CCP production establishments must be registered with the relevant local authority as food businesses. Destination countries may also require your establishment to be registered, listed or approved for export to their market. These requirements are separate from GB food business registration and vary between jurisdictions.

You should:

- register your food business with the relevant local authority;
- confirm whether any activities carried out at your establishment are subject to additional approval or authorisation requirements;
- check whether your production establishment meets the destination country's export requirements;
- verify those requirements directly with the destination country's competent authority.

Related guidance and legislation:

Cell-cultivated products: food business hygiene requirements.

Regulation (EC) 178/2002, Articles 12 (Food and feed exported from the Community), 17 (Food business operator responsibilities)



STEP 3: CONFIRM PRODUCT ELIGIBILITY AND SPS REQUIREMENTS

Check that your cell-cultivated product meets the destination country's import, marketing, SPS and certification requirements.

Your consignment may be subject to official controls undertaken by the competent authority under Regulation (EU) 2017/625 if these controls are applicable to the product and establishment concerned. In addition, the consignment must comply with any of the requirements of the destination country, which may impose different or additional inspection or documentary requirements.

Check product authorisation requirements

You should contact the destination country's competent authority to confirm:

- what type of food marketing authorisation, novel food approval, GMO approval (if applicable), taste-trial approval or equivalent you need.
- whether your product falls within any commodity-specific import controls the destination country applies

Check product compliance requirements

You should:

- find out the destination country's SPS requirements, as officials will check these at origin or point of dispatch, including your declaration status and any risk flags
- follow any traceability and record-keeping requirements set by the importing country, your product authorisation, import permit or certification requirements
- check for any restrictions or safeguard measures affecting your commodity

Check labelling and market requirements

You should check:

- the destination country's labelling requirements
- any CCP-specific labelling requirements that apply

Prepare supporting evidence

You should:

- have evidence ready for any official assurances, attestations or certification requirements the destination country specifies
- make sure your product meets GB food safety and hygiene legislation, where the importing country requires this

Related legislation:

- Regulation (EU) 2017/625, Article 1.3 (Subject matter and scope)
- Regulation (EC) 178/2002, Articles 12 (Food and feed exported from the Community), 17-19 (Food business operator responsibilities)



STEP 4: EXPORT HEALTH CERTIFICATION (IF REQUIRED BY DESTINATION COUNTRY)

Find out whether the destination country requires an Export Health Certificate (EHC), other official certification, or no government-issued certification. If you need official certification, get the relevant certificate before you export. We issue EHCs under UK export certification arrangements. The specific requirements we certify relate to products made in GB, and these requirements can differ depending on the destination country.

Find out what certification you need

If the destination country requires official certification, contact the importing country's central authority to find out their certification requirements.

If you need an EHC, you should:

- get the specific EHC requirements from the importing country's central authority
- check whether they match any existing certification
- if not, ask APHA to draft a new certification (see 'If no EHC exists yet' below)

If you're moving products within GB before export
You may need supporting health attestations to get the necessary assurances if you move products from your production premises before dispatch**.**

If no EHC exists yet for your product and destination country

Contact APHA through Get help with animal and plant health - GOV.UK with the import requirements and ask for a new EHC. You'll usually need to complete a questionnaire showing the anticipated volume and value of your export trade to the destination. Drafting and agreeing EHCs with import authorities is complex and can take a long time. This process does not always result in your ability to trade, and outcomes are dependent on the country, commodity and import conditions provided.

Get more help

General guidance on exporting food from GB is available online

Related guidance and legislation:

- General guidance on export health certificates: guidance on GOV.UK
- Regulation (EU) 2017/625, Title II, Chapter VII, Official Certification (Export certification)

STEP 5: CUSTOMS DECLARATION SYSTEM (CDS)

Submit your export declarations to HM Revenue and Customs (HMRC) through the Customs Declaration System (CDS)

Read the full step-step guide: Export goods from the UK: step by step - GOV.UK

HMRC will check:

- your commodity codes: to get certainty over a commodity code, apply for an Advance Tariff Ruling (ATaR)
- the customs value of your goods
- the duties, rules and restrictions that apply in the destination country

Export procedure

You should:

1. Check that you have a GB Economic Operators Registration and Identification (EORI) number. If you do not have one, apply to HMRC. You'll need to provide your unique taxpayers reference (UTR); VAT number (if registered) and business details. Approval takes up to 5 working days. If you're using a customs agent, they may have their own EORI.
2. Open CDS account through Government Gateway, unless you're using customs agent or customs software with integrated CDS.
3. Provide the following information: your commodity code (HS code), goods description, value and currency, weight and quantity, origin of goods, exporter and importer details, incoterms (such as EXW, FOB, DDP), transport details, and your EHC or other certification required by destination country. Incoterms are agreed between the seller and the buyer of the goods, and set out at which point the risks and costs of export shift from the seller to buyer.
4. Submit your export declaration. CDS will issue a Movement Reference Number (MRN), which is your unique shipment ID. You'll need this for tracking, linking to port systems and proving export.
5. If required, enter your MRN into the Goods Vehicle Movement Service (GVMS) to get a Goods Movement Reference. You'll need this to board a ferry or train.
6. Present your goods for clearance at the point of departure.



STEP 6: TEMPERATURE CONTROL AND TRANSPORT

You must maintain temperature controls during transport. Follow all UK legislative requirements, and check whether the destination country has additional requirements.

You should:

- chill your products to the required internal temperature before export. Further guidance to support CCP businesses on this aspect is being developed and will be published during the sandbox programme.
- maintain this temperature throughout the entire transport period
- use refrigerated transport vehicles or containers that are suitable for your goods
- monitor and record temperatures during transit
- check you meet the destination country's cold chain requirements
- check whether you need to register with the Goods Vehicle Movement Service (GVMS), for example, when moving goods via ports using pre-lodgement models. GVMS links your customs declaration with transit documents and generates a Goods Movement Reference
- check whether the destination country can store your consignment at chilled or frozen temperatures, where this applies

Related legislation:

Regulation (EC) 852/2004, Chapter II, Article 3: temperature controls, general requirements and Article 5 HACCP
The Food Hygiene (Scotland) Regulations 2006 (SSI 2006 No.3), Schedule 4
The Food Hygiene (Wales) Regulations 2006 (SI 2006/31 (W.5)), Schedule 4

STEP 7: LABELLING AND PACKAGING COMPLIANCE

Make sure your labelling meets the destination country requirements.

You should:

- meet UK labelling requirements per Regulation (EU) 1169/2011
- include novel food-specific labelling, if your authorisation requires this
- follow the destination country's requirements on labelling language, format and content
- use packaging that protects the integrity of your product throughout transport

Related guidance and legislation:

FSA Packaging and Labelling Guidance
FSS Packaging and Labelling Business Guidance
Food (Scotland) Act 2015
Regulation (EU) 1169/2011 (Food Information to Consumers)
The Food Information Regulations 2014 (SI 2014/1855) (England), the Food Information (Wales) Regulations 2014 (WSI 2014/2303 (W.227)), and the Food Information (Scotland) Regulations 2014 (SSI 2014/312).

STEP 8: DOCUMENTATION AND TRACEABILITY

You should prepare a complete documentation package. This should include:

- an Export Health Certificate (EHC) or equivalent
- a commercial invoice and packing list
- traceability records, as required under Regulation (EC) 178/2002, Article 18
- HACCP documentation and production records
- temperature monitoring records for cold chain
- any additional documentation the destination country requires

Related legislation:

Regulation (EC) 178/2002, Article 18 (Traceability)
Regulation (EU) 2017/625, Article 87 (Official certificates)

STEP 9: DISPATCH AND DESTINATION COMPLIANCE

When your consignment leaves GB, you should:

- send all required documentation with the consignment
- keep products at the correct temperatures throughout export
- know that the destination country may conduct border inspections and checks

You're responsible for making sure your product meets the importing country's requirements, including the EHC and any other relevant documents.
The importer in destination country is responsible for handling the goods according to that country's marketing, documentary and other import requirements.

You should keep records of export for traceability.

Depending on your arrangements, the food business operator (FBO), freight forwarder or agent is responsible for food safety until the goods reach their final destination.

Once your goods leave GB, the CDS status updates to "departed". You can then download the Export Accompanying Document (EAD).

Related legislation:

Regulation (EC) 178/2002, Article 17 (Food Business Operator Responsibilities)