



Agricultural Marketing Service  
U.S. DEPARTMENT OF AGRICULTURE



# Frequently Asked Questions European Union Export Verification Program (EU-EVP)

AMS Dairy Program Grading Branch

February 2026

## General EU-EVP Requirements

### 1. What is the purpose of the European Union (EU) Export Verification Program (EVP)?

In most cases, U.S. dairy requirements typically align with those of other countries, allowing the use of simplified export certificates for most markets. Special EVPs are generally unnecessary for demonstrating the safety of U.S. dairy products in these cases.

The EU and some other countries mandate export certificates with specific attestations to confirm dairy products meet unique requirements for entry into their markets. The EU-EVP has been developed to ensure U.S. dairy products comply with these unique requirements and to facilitate continued market access for U.S. dairy exports. The EU-EVP has been developed with industry input and designed in a manner to minimize the burden to the U.S. dairy industry while still meeting market requirements.

### 2. What are the differences between U.S. and EU requirements?

The differences between U.S. and EU requirements relate to:

- Specific animal health requirements. The U.S. can demonstrate meeting the EU requirements by ensuring all dairy farms supplying raw milk to processors are properly credentialed and under the purview of an appropriate animal health monitoring program.
- Raw milk quality test requirements for Somatic Cell Count (SCC) and, in some cases, bacterial Standard Plate Counts (SPC).
- Prohibited use of certain antimicrobials in food producing animals.

### 3. What countries require the EU-EVP?

27 EU member countries including: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden. European Free Trade Association countries are also covered including Iceland, Liechtenstein, Norway, and Switzerland. Additionally, Turkey and the United Kingdom have requirements similar to the EU and are covered by this program.

### 4. What products are impacted by the EU-EVP program?

Dairy products and non-shelf stable composite products containing a dairy ingredient destined to the countries identified above are impacted. A composite product is defined as a food containing products of both animal origin and plant origin.

### 5. What facilities within the U.S. dairy industry supply chain are impacted by the EU-EVP?

All dairy products or ingredient processing facilities within the supply chain are impacted by the EU-EVP requirements. Each facility within the supply chain must demonstrate the dairy products/ingredients included in each product exported to these

countries that were manufactured using dairy products/ingredients derived from milk sources meeting the EU requirements.

## 6. What is a Certificate of Conformance (CoC)?

A CoC is a document stating a product meets a required standard, or specification. In this case, the EU-EVP CoC attests the dairy product/ingredients used in the food product(s) covered by the issued certificate, meet EU requirements.

## 7. What are the essential elements of a CoC for the EU-EVP?

EU-EVP CoCs include the following statements regarding the raw milk and dairy ingredients used to produce the exported product.

- a) Raw milk used to manufacture the dairy product/ingredient was supplied by credentialed (permitted/licensed) farms regulated either under the requirements of the Grade 'A' Pasteurized Milk Ordinance (PMO), the USDAAMS Milk for Manufacturing Purposes and its Production and Processing Recommended Requirements, or comparable state regulations.
- b) Raw milk meets the SCC and bacterial SPC test requirements. (Not applicable for EU Transit Certificates.)
- c) Source animals from which raw milk was obtained to produce the dairy products and/or dairy ingredients have not been administered any of the EU prohibited antimicrobials. (Not applicable for Turkey or the United Kingdom.)

## 8. What are the EU-EVP requirements for transit certificates?

For commercial shipments transiting the EU to third countries, the following statements apply:

- *Public Health Attestation Exemptions:* Transit consignments must meet EU animal health attestations but are exempt from EU public health attestations. This means requirements for SCC, bacterial SPC, and the new Antimicrobial Resistance (AMR) attestations do not apply.
- *Dairy Supply Chain Verification:* Despite the SCC/bacterial SPC exemption, exporters must still maintain a CoC to demonstrate the raw milk was sourced from permitted/licensed farms regulated under the Grade 'A' Pasteurized Milk Ordinance (PMO), USDAAMS Milk for Manufacturing Purposes requirements, or comparable state regulations.
- *Plant Verification:* Manufacturing plants supplying dairy ingredients must be either on the EU approved facilities list for [Raw milk, dairy products, colostrum and colostrum-based products](#) or verified to be in good regulatory standing.
- *Audit and Record Retention:* EU transit shipments are subject to USDA EU-EVP audits. Records verifying the farm source must be maintained for at least 12 months after shipment, though retention is not required beyond three years.

## Dairy and Composite Product Processor and Applicant Responsibilities

### 9. What unique information must an applicant, or dairy processor, provide on each CoC?

The processor shall maintain sufficient documentation to enable traceability of milk or dairy products covered by the CoC, allowing verification during an audit by tracing at least one step back toward raw milk production. This may include production lot identification codes, production dates, bills of lading or other similar information. It will not detail individual farms.

A food processor's CoC for dairy or composite product(s), at a minimum, should include:

- A clear statement the dairy product(s)/dairy ingredient(s) were produced under a system that results in compliance with EU requirements.
- The dates or lot codes the dairy product(s)/dairy ingredient(s) (covered the CoC) were processed.
- The manufacturing location of the product listed on the CoC.
- The signed and printed signature, email, and phone number of the individual who is authorized to attest to these statements.
- A date when the processor's CoC was signed.
- Confirm the milk used was not treated with listed antimicrobials from EU 2022/1255.

### 10. What if a dairy or composite product processor uses imported dairy ingredients?

Dairy or composite product processors utilizing imported dairy products and dairy ingredients intended to be used to produce products that will be shipped to the EU must:

- Ensure the manufacturing facility is on the EU Third Country Establishment approved facilities list for the country origin for [Raw milk, dairy products, colostrum and colostrum-based products](#), and
- The dairy ingredients meet the EU requirements.

### 11. To reduce any potential complications, could standardized CoCs be implemented across all markets, even though some of the CoC attestations may not be necessary for select situations/countries?

Yes. In certain situations, using standardized CoCs may simplify the process. When the CoC attestation is not applicable to a certain situation or country, records associated with the non-applicable attestation(s) will not be reviewed during an audit. Additionally, processors using uniform CoCs may opt to strike through attestations when they are not applicable.

## Milk Supplier's Responsibilities

### 12. What is a milk supplier?

A milk supplier is the provider of raw milk, or entity with farm records, used in the manufacture of dairy products. Basically, a milk supplier is a representative of a dairy

farm who supplies raw milk to the U.S. dairy industry supply chain. Examples of milk suppliers may include: a cooperative, direct-ship dairy farm, milk shipper (the entity with farm records), proprietary processor with its own raw milk supply, milk marketer, etc.

### **13. What information must a milk supplier provide on each CoC?**

[Refer to Question 7.](#)

### **14. How do the AMR requirements affect raw milk suppliers?**

Raw milk suppliers must maintain an affidavit signed by a responsible company representative indicating the source animals for raw milk supplies have not been administered EU prohibited antimicrobials. Raw milk suppliers must also demonstrate that farms supplying raw milk have received communication indicating these antimicrobials are prohibited from being administered to milk producing animals. The affidavit and communications to farms must be updated annually. New farms entering into an agreement with a milk supplier must be notified immediately.

### **15. What are the responsibilities of the milk supplier when a farm's rolling geometric mean exceeds the maximum EU requirement?**

A milk supplier must notify AMS if a farm's rolling mean exceeds the EU requirement, and the milk is used for products that are certified for export to the EU. If the farm comes back into compliance no further notification is needed. If the farm exceeds the EU requirement for three consecutive months following the notification month (four consecutive high months) then the plant must ask for a derogation or exclude the milk from entering products shipped to the EU.

## **Milk Quality Requirements**

### **16. What are the differences between the U.S. and EU SCC requirements?**

Per the Pasteurized Milk Ordinance (PMO), the regulatory SCC limit for milk marketed in the U.S. is 750,000 cells/ml. Some states set standards that are more stringent than the PMO. The regulatory limit for SCC in the EU is 400,000 cells/ml. Milk with a rolling geometric mean SCC greater than 400,000 cells/mL cannot be certified for export to countries covered by the EU-EVP unless a derogation is requested from AMS.

### **17. How should the monthly milk quality records be established for each farm?**

Sampling Requirements:

- At least one milk sample per farm, per month for SCC, or
- At least two samples per farm per month for bacterial SPC, or
- A milk supplier may use an average from multiple samples taken during the month.

AMS Accepted Test Results:

- Test results used for payment calculations.
- Regulatory test results, as long as the minimum thresholds are met.

Data Processing:

- Calculate the rolling geometric mean for SCC and bacterial SPC (as applicable).
- Trend the results to ensure compliance with EU-EVP requirements.

**18. Will monthly bacterial SPC test results be required for verified Grade ‘A’ milk producers?**

No. The U.S. regulatory SPC requirement for Grade ‘A’ milk is equivalent to the EU regulation of 100,000 bacteria per ml. Bacterial SPC test results are only required for Manufacturing Grade dairy farms. Manufacturing Grade farms are provided for two months to establish an initial two-month rolling geometric mean for SPC.

Manufacturing Grade dairy farms must maintain a monthly rolling geometric mean results for both SCC and bacterial SPC. Milk with a rolling geometric mean for SPC, greater than 100,000 cells/mL, cannot be certified for export to the EU unless a derogation is requested or the milk is segregated from EU production.

**19. Are there any methods for EU-EVP raw milk quality requirements to be met if a dairy producer’s test results exceed the applicable limits?**

Yes. If an individual dairy producer’s test results exceed the EU limits for either SCC or bacterial SPC, the milk supplier may segregate the producer’s milk and ensure it does not enter the supply chain for processing dairy products or ingredients that may be exported to the countries impacted by the EU-EVP. If requested, records must be provided to illustrate the segregation of the milk exceeding the test results.

## Antimicrobial Resistance Requirements (AMR)

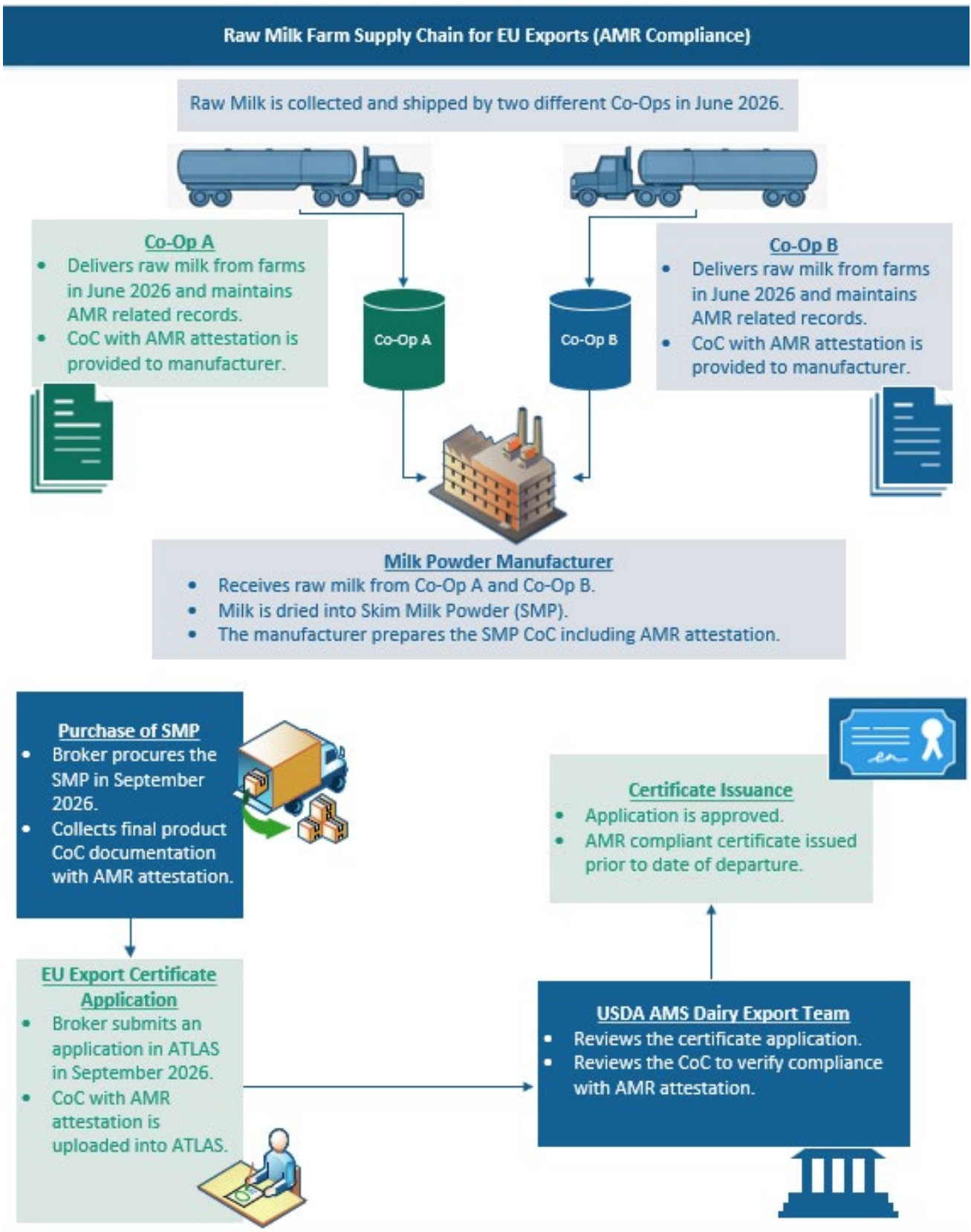
**20. What certificates are impacted by the new AMR requirements?**

The new AMR requirements are applicable to EU dairy and colostrum product certificates, chapters 34, 36, and 38. AMR requirements do not apply to transit certificates for chapter 34, 35, or 38 products nor do they apply to composite products on EU chapter 50 and 52 certificates. AMR requirements are not applicable to Great Britain or Turkey certificates.

**21. When will raw milk suppliers and dairy processors be required to begin using CoC’s with the AMR attestation?**

EU AMR requirements go into effect on September 3, 2026. Raw milk suppliers and dairy processors should have this documentation in place well in advance of this date to ensure dairy products and ingredients produced prior to this date can meet this requirement on the implementation date. A supply chain example illustrating the need for updated CoCs to be used well in advance of September 3, 2026, is provided below.

Figure 1: Example of dairy industry supply chain and use of the updated CoC with AMR attestation.



All products exported after September 3, 2026 are required to meet the EU AMR requirements regardless of production dates.

**22. Are milk suppliers who supply colostrum for manufacturing required to maintain the AMR affidavit?**

Yes. Milk suppliers representing farms supplying colostrum to produce products exported to the EU are required to maintain the AMR affidavit and annual communication to their patron farms.

**23. Do composite dairy products need to update their CoC with the AMR statement?**

Composite dairy products are not subject to the AMR regulation; however, customers may use the updated CoC containing the AMR statement for dairy ingredients used to produce composite products. If preferred, a CoC without the antimicrobial statement can also be used for dairy ingredients used to produce composite products. For additional information, [See question 11.](#)

**24. Can a milk supplier maintain a single document to cover all farms?**

Yes. A milk supplier may maintain a single AMR affidavit, updated annually, to represent all farms supplying raw milk. The milk supplier must communicate with all farms regarding the EU prohibited antimicrobials to ensure these antimicrobials are not being used in animals supplying milk for dairy products intended for export to the EU.

**25. Do other species farms, in addition to cow farms, need to maintain an AMR statement?**

Yes. All species' (*Bos Taurus*, *Ovis aries*, *Capra hircus*, *Bubalus bubalis*, and *Camelus dromedarius*) milk intended for human consumption and exported to the EU are required to maintain an antimicrobial statement.

**26. How often should the written communication on AMR be provided from a milk supplier to its farms?**

The communication shared with farms should occur immediately when the farm associates with the milk supplier and annually thereafter.

**27. What antimicrobials are prohibited from use in animals which may supply milk to produce dairy products/ingredients exported to the EU?**

The list below identifies prohibited microbials from EU [Commission Implementing Regulation \(EU\) 2022/1255](#) dated 19 July 2022.

- Antibiotics
  - Carboxypenicillins
  - Phosphonic acid derivatives
  - Ureidopenicillins
  - Glycopeptides
  - Ceftobiprole
  - Lipopeptides
  - Ceftaroline
  - Oxazolidinones
  - Combinations of cephalosporins with beta-lactamase inhibitors
  - Fidaxomicin
  - Siderophore cephalosporins
  - Plazomicin

- Carbapenems
- Glycylcyclines
- Penems
- Eravacycline
- Monobactams
- Omadacycline
- Antivirals
  - Amantadine
  - Nitazoxanide
  - Baloxavir marboxil
  - Oseltamivir
  - Celgosivir
  - Peramivir
  - Favipiravir
  - Ribavirin
  - Galidesivir
  - Rimantadine
  - Lactimidomycin
  - Tizoxanide
  - Laninamivir
  - Triazavirin
  - Methisazone/metisazone
  - Umifenovir
  - Molnupiravir
  - Zanamivir
- Antiprotozoals
  - Nitazoxanide

**28. Is the use of ionophores in the U.S. dairy industry impacted by the new AMR requirements?**

No. The use of ionophores in the U.S. dairy industry is not impacted by the new AMR requirements. The U.S. sought clarification from the EU regarding whether ionophores would be restricted. The EU confirmed that coccidiostats and histomonostats (including ionophores) are considered feed additives for use in animal nutrition under Regulation (EC) No 1831/2003, not veterinary medicinal products. Therefore, ionophores are not included in the list of antimicrobials reserved for human use and their use is not forbidden for imports to the EU from third countries.

## Derogations

**29. What is a notification?**

A notification is required prior to a derogation. A notification is provided to AMS Dairy Program when a farm's SCC or bacterial SPC rolling geometric mean exceeds the EU requirements for the first time.

### 30. What is a derogation?

A derogation is a deviation under special circumstances that allows milk to be accepted by the EU-EVP even if it does not meet standard requirements. A derogation may be granted if the processing of milk or milk products are:

- Pasteurized, or
- Manufactured into raw milk cheese aged at least 60 days before being placed on the market.

Additionally, testing of farm milk samples must continue during the derogation period, and derogations must be renewed annually if the farm's test results still exceed the EU requirements.

### 31. What information is required when requesting a seasonal derogations?

Seasonal derogations can only be requested for SCC levels exceeding the EU requirement.

A seasonal derogation can be granted to a producer who can demonstrate for at least nine months of the year, the farm complies with EU SCC standards. The cause of elevated SCC must be due to seasonal phenomena (e.g. high temperatures, seasonal rains), not to poor sanitary, hygiene, or animal husbandry practices. . Records such as milk payment records, processor data, and Dairy Herd Improvement Association (DHIA) records for the previous 12 months may be used to demonstrate the need for a seasonal derogation. Records should be sent to [DairyAuditServices@usda.gov](mailto:DairyAuditServices@usda.gov) for review. These records must demonstrate elevated SCC results are the result of a seasonal phenomenon. Seasonal derogations must be renewed every three years.

### 32. What information is required when requesting a derogation?

The following information must be provided when requesting a derogation:

- *Billing details:* Applicant AMS account number, email address
- *Contact Information:* name of requester; phone number; e-mail address
- *Milk Information:* the name, city, state, plant number and customer number of milk supplier requesting the derogation; customer reference
- *Farm Information:* name of the farm; city; state; farm operator; state permit number
- *Geometric Mean Count Information:* if the derogation is being requested for the rolling geometric mean for Somatic Cell Count or Bacterial Standard Plate Count; date of noncompliance; rolling geometric mean counts; month and year of noncompliance; comments

### 33. How long is the derogation approval process expected to take?

Derogation requests are reviewed by AMS Dairy Program, and most standard (non-seasonal) derogations reviews are completed within five business days. Seasonal derogation requests may take longer to review.

**34. What are the conditions under which a derogation or derogation renewal would be denied?**

A derogation request or renewal will not be approved if any aspect of the application could be determinantal to the EU export certificate program. The application will be denied if a notification was not submitted at least three months prior to the derogation request. All renewal derogations require an [Affidavit for Producer Corrective Action](#) which can be accessed at [AMS Dairy Program – EU Dairy and Composite Product Certification Programs](#). A derogation renewal application may be denied if there is no apparent effort to bring the farm into compliance during the previous derogation period.

**35. In addition to being out of compliance with either the SCC or the bacterial SPC requirements, is it possible for a farm to be out of compliance with both requirements?**

Yes. A farm could be out of compliance with either of the requirements or both requirements simultaneously. These requirements are mutually exclusive meaning each derogation applies specifically to its respective parameter (SCC and bacterial SPC). Therefore, a farm could conceivably have two derogations at the same time.

## EU-EVP Audits

**36. Who is responsible for financial charges incurred during an EU-EVP Audit?**

The firm or organization being audited is responsible for audit fee charges.

**37. How will documentation be utilized to trace back to the producer?**

A CoC must accompany each transfer of milk or dairy products/ingredients through the supply chain. Each supplying plant must maintain records proving that each lot meets EU requirements for SCC and/or bacterial SPC. AMS will conduct a review and trace at least one continuous production line from exported products back to the farm milk source.

**38. How long must records be retained for review purposes?**

Records documenting compliance must be kept at a minimum of 12 months or from the last audit, whichever is longer. Records must be accessible during AMS Dairy Program audits. Record retention is not required beyond three years.

**39. What records will be reviewed?**

Records to document compliance with EU requirements include but may not be limited to:

**Broker/Applicant Auditee documents:**

- Applicant's CoC
- Export Certificate(s)

- Export Certificate(s) to verify the dairy manufacturer is listed on the EU export approved facilities list for [Raw milk, dairy products, colostrum and colostrum-based products](#)
- Production records
- Distribution / Shipping records
- Manufacture / Processor CoCs to document traceability one step back towards the raw milk supplier.

**Manufacturer/Processor Auditee documents:**

- Processor of Dairy Ingredients' CoC
- Batch identification procedures
- Production records
- Distribution records / Shipping documents
- CoC(s) from dairy ingredient supplier(s) and/or raw milk supplier(s) tracing one step back towards the raw milk supplier.

**Milk Supplier Auditee documents:**

- Milk Supplier's CoC
- Farm permits/licenses,
- Farm inspection records (to identify permit/license status),
- Other records to verify the farms' permits/licenses
- Producer payment records (test results portions); Laboratory test records
- Batch identification procedures
- Raw milk production records: Totals for the Grade A and Manufacture Grade farms, SCC & SCC milk records, notifications, derogations, rolling mean, geo-metric mean.
- Distribution records / Shipping documents
- Signed AMR affidavit for raw milk suppliers (valid for one year)
- Communication from Milk Supplier to patron farms on AMR Requirements

**40. If a raw milk supplier does not provide CoC with an AMR attestation applicable to or covering each farm supplying raw milk, what happens during an audit?**

If an auditor determines the AMR attestation is not being provided on a CoC or there is insufficient information provided to verify compliance with the attestation, a nonconformance may be assigned. This may impact the ability to export dairy products to the EU when dairy products are produced from milk provided by the raw milk supplier.

## Additional Resources

The official EU Export Certification Program document may be found on the USDA website. [AMS Dairy Program – EU Dairy and Composite Product Certification Programs](#)

## Contacts

For export certificate related questions, please contact:

USDA, AMS, Dairy Program Grading Branch, Export Program

E-mail: [DairyExportsQuestions@usda.gov](mailto:DairyExportsQuestions@usda.gov)

For audit, derogation, or AMR related questions, please contact:

USDA, AMS, Dairy Program Grading Branch

E-mail: [DairyAuditServices@usda.gov](mailto:DairyAuditServices@usda.gov)

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