

Dairy Export Certification

Turkey Health Certification Program

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1.0 Background

These instructions establish the responsibilities and procedures for obtaining Turkey Health Certificates. The program outlined in these instructions shall be used to demonstrate compliance with Regulation on Specific Hygiene Rules for Food of Animal Origin which outlines the requirements for the export of dairy products from the United States to the Turkey. The major difference between the United States and Turkey milk requirements is the maximum limit on somatic cell and bacterial standard plate counts for the raw milk.

2.0 Products Covered

The requirement to provide an Turkey health certificate is controlled by the importing country or port authority within Turkey. Generally, all dairy products that are readily recognized as a dairy product or require in their standard of identity that they originate from milk, will require an Turkey health certificate. In addition, composite milk products that either utilize a dairy product as a characterizing effect or contain dairy ingredients as an essential part of the product, generally will require certification if exported to the Turkey. Examples of dairy products and composite products that require certification are:

Milk and Cream (not concentrated nor containing added sugar or other sweetening

Milk and Cream added sugar or other sweetening matter)

Buttermilk, curdled milk and ((concentrated or containing cream, yogurt, kephir and other fermented or acidified milk and

Cheese and curd

Butter and other fats and oils derived from milk; dairy spreads.

Casein, caseinates and other casein derivatives; casein glues.

Whey and milk products nesoi, flavored or not

Examples of composite products identified as containing only a minimum part of milk or milk product and that **generally do not require** are:

Milk Chocolate Whiskey Cream

Butter Crackers Breton Crepes

Salad Dressing **Creamed Tomato** Cupcakes

3.0 Dairy Plant Export Reference Lists

All domestic plants producing dairy or related products that manufactured the product in the final package, for export to Turkey must be identified on a "Dairy Plant Export *Reference List*". Below are the acceptable Dairy Plant Export Lists:

•Interstate Milk Shippers (IMS) list, maintained by the Food and Drug

Administration (FDA)

- •FDA maintained European Union (EU) Dairy Plant Reference list (pdf)
- •Dairy Plants Surveyed and Approved for USDA Grading Service, maintained by the Dairy Grading Branch

If a dairy manufacturing plant is not on any of the above lists contact Dairy NFO at <u>DairyNFO@ams.usda.gov</u>.

3.1. Electronic Submissions - New Electronic Registry System

FDA has launched a new electronic system that U.S. manufacturers and processors of milk products can use to request to be included on a list of eligible exporting facilities to facilitate meeting a foreign country's requirements. Some foreign countries use a list to identify U.S. manufacturers and processors that are eligible to ship milk products to their countries.

The FDA Unified Registration and Listing System (FURLS) Export Listing Module (ELM) allows U.S. manufacturers and processors of milk products to apply for inclusion on export lists, update listing information, and reapply for lists as necessary. The FDA will use the information collected through the ELM, the electronic application portal, to review the application and update the lists on a regular basis. The ELM improves the FDA's ability to efficiently process firms' requests to be added to the lists, monitor listed firms, and generate lists for foreign regulatory agencies.

Firms needing additional information can contact the Office of Food Safety at DLM-OFS@fda.hhs.gov.

Dairy plants that supply dairy product(s) or dairy ingredient(s) to an applicant but do not ship dairy product directly to the Turkey are not required to be on a "Dairy Plant Export Reference List" but will be subject to AMS Dairy Programs reviews of records to verify compliance with Turkey somatic cell and bacterial standard plate count requirements.

4.0 Regulation on Specific Hygiene Rules for Food of Animal Origin

The requirements for dairy products imported into the Turkey are detailed in the Regulation on Specific Hygiene Rules for Food of Animal Origin. These comprehensive regulations address many issues relative to milk production and

processing. Countries outside of the Turkey that wish to import dairy products to that market are required to provide certificates that indicate compliance with these regulations.

Milk produced and dairy products manufactured under the United States system provide safeguards at least to the Turkish Regulation on Specific Hygiene Rules for Food of Animal Origin. There are two quality related differences in the two systems:

1) the Turkey somatic cell count and bacterial standard plate count requirements that apply at the farm level and 2) the method for calculating somatic cell count and bacterial standard plate count averages (rolling geometric mean). To certify dairy product shipments to the Turkey, AMS Dairy Programs requires dairy product manufacturers to certify compliance with the somatic cell count and bacterial standard plate count requirements of the Turkish Regulation on Specific Hygiene Rules for Food of Animal Origin. The requirements are as follows:

- The maximum somatic cell count in raw cow's milk for the production of heat-treated milk, milk products and other milk-based products is 400,000 somatic cells per ml.
- The maximum bacterial standard plate count for raw cow's milk for the production of heat-treated milk, milk products and other milk-based products is 100,000 bacteria per ml.

Grade A cow's milk and Grade B cow's milk in the U.S. are regulated at maximum somatic cell counts of 750,000 per ml. Grade A milk in the U.S. is regulated at a bacterial standard plate count of 100,000 or less. The recommended regulatory bacterial standard plant count for Grade B cow's milk in the U.S. is 500,000 per ml or less. Testing of the farm-level milk supply will be necessary to document compliance with the Turkey requirements for shipment of dairy products to the Turkey (both grades of milk for somatic cell count and Grade B milk for bacterial standard plate counts). Plants with a Grade A milk supply that supply ingredients or raw milk are generally exempt from requirements to keep additional records on bacterial standard plate counts to confirm compliance with the Regulation on Specific Hygiene Rules for Food of Animal Origin.

4.1 Minor Ingredients

Minor dairy ingredients making up a composite food may not require an Turkey Health Certificate. The requirement for certification is under the control of the importing country.

5.0 Requesting a Turkey Certificate through eTDE

To request Turkey Health Certificates exporters must register to use the Electronic Trade Document Exchange System (eTDE). eTDE provides a secure environment for sharing trade documentation with governments and businesses across the supply chain.

To work within this security framework, there are a number of actions that new users and companies must take:

- Individuals must obtain level 2 eAuthentication
- Companies must be registered in eTDE
- First time users must go to eTDE www.eTDE.usda.gov and will be directed to a profile page to request party and role association.

For additional information please review the Turkey Health Certificates – Overview of USDA Online Procedures (pdf) located on the <u>Turkey Dairy Export Certification Program web-site</u>.

6.0 Applicant's Responsibility

The applicant shall apply for and obtain an Turkey Health Certificate for products containing milk and/or milk products destined to the Turkey. The applicant shall ensure that the manufacturing plant that puts the product in the final package for export is included on the "Dairy Plant Export Reference" list (See Section 3.0 "Dairy Plant Export Reference List").

The applicant shall submit the following information to AMS Dairy Programs for issuance of an Turkey Health Certificate:

- Certificate of Conformance on company letterhead signed by a responsible official for the applicant (See <u>Exhibit 1.B.1</u>) or the electronic equivalent.
- Each request for an Turkey Health Certificate shall include enough information to trace back at least one step toward the raw milk production for products covered by the Turkey Health Certificate. This can include production lot identification codes, production dates, bills of lading or any other documentation that provides this information. This information is necessary to certify compliance with "Regulation on Specific Hygiene Rules for Food of Animal Origin" during AMS Dairy Programs review of records.

The Turkey Health Certificate can be requested over the internet at the AMS Dairy Programs website at: https://www.ams.usda.gov/services/imports-exports/dairy-

<u>exports/turkey</u>. If the applicant request the certificate online the requirement for a COC is fulfilled by the check boxes on the bottom of the request.

If the information necessary to facilitate at least one step trace back toward the raw milk production certified is not included, the issuance of an Turkey Health Certificate will be denied until the information is provided.

The applicant requesting an Turkey Health Certificate is solely responsible for maintaining the COC(s) for the dairy products and dairy ingredients used in the product in the final package for export. The COC shall provide information necessary to facilitate at least one step trace back toward raw milk production for verification during the AMS Dairy Programs review of records.

An applicant who fails to maintain adequate records and COCs that substantiate each request for an Turkey Health Certificate, as determined during an AMS Dairy Programs review of records, will immediately be ineligible to receive Turkey Health Certificates. To reestablish eligibility, an AMS Dairy Programs review of records will be conducted to determine if adequate records and COCs are maintained to tie the product in the final package for export to raw milk that is in compliance with Turkey requirements through one step trace back (toward raw milk production). This review shall be completed prior to issuance of any certificates to this applicant.

Applicants are advised that production codes and establishment numbers on product containers and shipping container seal numbers documented on the Turkey Health Certificate maybe required.

8.0 Retention of Records

The applicant shall maintain records that demonstrate compliance with Turkey raw milk requirements to trace back at least one step in the supply chain (toward the raw milk producer) for all dairy products and all applicable dairy ingredients intended for export to the Turkey. The applicant is responsible for the records to trace the final product back to the raw milk. The applicant will be subject to AMS Dairy Programs reviews of records to verify compliance with Turkey somatic cell and bacterial standard plate count requirements

The applicant for the Turkey health certificate, the processors and the milk suppliers involved in the production of the product that was certified for shipment to the Turkey; must maintain records documenting compliance with Turkey somatic cell count and bacterial standard plate count for a minimum of 12 months after the date of shipment or since the last review, whichever is longer. Retention of records shall not be required beyond three years.

If AMS is not able to trace records back to the raw milk that demonstrate compliance with Turkey's "Regulation on Specific Hygiene Rules for Food of Animal Origin" the applicant shall be restricted from receiving future Turkey certificates.

9.0 Responsibility of Processors of Dairy Ingredients and/or Products

The requirements for a processor where the dairy ingredient or composite food requires a Turkey Health Certificate are:

- A. The processor has on file and available for AMS Dairy Programs review of records COCs from their dairy ingredient supplier(s) demonstrating the dairy product(s)/dairy ingredient(s) meet Regulation on Specific Hygiene Rules for Food of Animal Origin for somatic cell and bacterial standard plate count requirements. The processor's COCs (see Exhibit 1.B.2 issued for their product(s) should, at a minimum, include:
 - A clear statement the dairy product(s)/dairy ingredient(s) were produced under a system that results in compliance with the somatic cell and bacterial standard plate count requirements of Regulation on Specific Hygiene Rules for Food of Animal Origin,
 - The dates the dairy product(s)/dairy ingredient(s) (for which the COC is issued) were processed,
 - The location where the documents of compliance can be found,
 - The signature of the individual who is authorized to attest to these statements, and
 - A date when the processor's COC was signed.
- B. If the dairy product(s)/dairy ingredient(s) is/are imported into the United States from another country, the dairy product(s)/dairy ingredient(s) must have an Turkey Health Certificate issued by the sovereign government of the exporting country providing the same assurance as the certificate issued by AMS Dairy Programs (see Exhibit 4, "Turkey Health Certificate"). This includes dairy product(s)/dairy ingredient(s) imported from the Turkey or countries maintaining equivalency agreements with the Turkey.
- C. Records shall be retained that provide (i) a COC that includes enough information to trace back at least one step toward the raw milk production for products covered by the Turkey Health Certificate demonstrating milk used to produce those products complies with the Regulation on Specific Hygiene Rules for Food of Animal Origin, **or** (ii) any other documentation which can demonstrate the

conformance of the somatic cell and bacterial standard plate counts to the Turkey requirements.

10.0 Milk Supplier's Responsibility

AMS Dairy Programs will review the system used by the milk supplier (for example: cooperative, direct shipper, milk shipper (the entity with farm records), proprietary processor, dairy milk marketer, etc.) that supplied milk for processing to verify compliance with somatic cell and bacterial standard plate count requirements of the Regulation on Specific Hygiene Rules for Food of Animal Origin. The milk supplier shall have records of individual farms available to confirm that raw milk meeting the somatic cell and bacterial standard plate count requirements of the Turkey is received at the facilities manufacturing dairy products for shipment to the Turkey. While a number of different compliance systems devised by the milk supplier may result in compliance with the requirements of the Regulation on Specific Hygiene Rules for Food of Animal Origin, AMS Dairy Programs considers the following minimum requirements:

A. The milk supplier shall test all farms whose milk or milk products could be incorporated into product in the final package for export to the Turkey which would require an Turkey Health Certificate. From each farm, at least two samples per month must be analyzed for bacterial standard plate count and one sample per month for somatic cell count. Calculation of bacterial standard plate count means (arithmetic or geometric; hereafter referred to as "mean") will be based on a rolling two-month time period. Calculation of somatic cell count mean will be based on a rolling three-month time period.

(Note: At the implementation of these instructions for the European Health Certification Program all farms will be given three months to establish initial means for somatic cell counts and two months to establish initial means for bacterial standard plant counts. Startup farms and farms that transfer between milk suppliers will be given three months to establish a somatic cell count mean and two months to establish a bacterial standard plate count. The old instructions will continue to be used until an initial mean is established for each farm.)

- 1. If a farm's rolling mean for either the somatic cell count or the bacterial standard plate count exceeds the maximum Turkey requirements, the milk supplier must notify AMS Dairy Programs and take appropriate measures to bring the farm into compliance.
- 2. If a farm's SCC mean or SPC mean exceeds the Turkey requirements for three consecutive months after the above notification to AMS Dairy Programs, as

demonstrated in the chart below:

	Data for determining compliance for export of product to Turkey		
Month	Monthly data for rollingthree-month mean for	Result of rolling three-month mean for SCC	Actions
January	Oct, Nov, Dec	>400,000	Milk ok for export in Jan. Notify AMS.
February	Nov, Dec, Jan	>400,000	Milk ok for export in Feb. (1st month)
March	Dec, Jan, Feb	>400,000	Milk ok for export in Mar. (2nd month)
April	Jan, Feb, Mar	>400,000	Milk NOT ok for export in April. Milk supplier must suspend, segregate, discontinue certification or request derogation. (3rd month)

(AMS would expect the Milk Supplier to take steps to request derogation or exclude the milk from Turkey certification when they receive the April numbers (That is in early May). AMS will accept derogations as applying retroactively if the milk supplier makes the request in a reasonable time frame.)

The milk supplier must

- (1) suspend pick up of milk from the farm; **or**
- (2) segregate the products made from that milk from the products that comply with Turkey requirements;

or

(3) discontinue certifying that products made with this milk meet the requirements of the Regulation on Specific Hygiene Rules for Food of Animal Origin;

or

- (4) at the request of the farm, contact AMS Dairy Programs and ask for a derogation (deviation underspecial circumstances) to allow this milk to be accepted into the Turkey export program. A derogation will be granted provided that during processing the milk or milk products are (i) pasteurized **or** (ii) made into raw milk cheese that will be aged at least 60 days before being placed on the market. Corrective actions and out-of-compliance monitoring activities are expected to continue during the derogation period, which is valid for one year. In the event of a farm's continued non-compliance, the derogation must be reapplied for one year following the issuance of the derogation.
- 3. A milk supplier, at the request of the farm, may request from AMS Dairy Programs a

"seasonal derogation"*. A seasonal derogation will be granted to a farm that can demonstrate for a majority (at least 9 months) of the year they are in compliance with the Turkey requirements for somatic cell count; only due to seasonal variations is the farm's somatic cell count escalated for a period of time during the year. The farm must be able to demonstrate through records that this variation is truly seasonal and not the result of poor hygiene or sanitary procedures. All seasonal derogations will be reviewed during the AMS Dairy Programs review of records to verify compliance with Turkey regulations. Seasonal derogations must be renewed every three years.

- B. The milk supplier shall provide (i) a Certificate of Conformance (COC) (see Exhibit 1.B.3) that can be used to link products exported to the Turkey with raw milk somatic cell counts and bacterial standard plate counts of the milk used to produce those products to provide verification of compliance Regulation on Specific Hygiene Rules for Food of Animal Origin **or** (ii) any other documentation which can demonstrate the conformance of the somatic cell and bacterial standard plate counts to the Turkey requirements. At a minimum, this would indicate the timeframe for which the COC covers. As an example, a COC covering raw milk delivered in March would be based on February's compliant three-month rolling mean.
- C. To verify compliance with Turkey requirements Regulation on Specific Hygiene Rules for Food of Animal Origin, AMS Dairy Programs will conduct a review of records. This review will verify COCs provided by the milk supplier demonstrate compliance with Turkey requirements. During the review, at least 10% of the milk supplier's farm records will be reviewed. Farms in the review will consist of only those for which the milk supplier issued a COC.

Through any of the above procedures, the milk supplier will be able to confirm that the somatic cell and bacterial standard plate count means for milk used to make the product in the final package for export to the Turkey meets the requirements of the Turkey.

11.0 Renewing Derogations

The following procedures will be followed for renewing (non-seasonal) derogations. Seasonal derogations cover a period of three years.

11.1 Determining if an Immediate Renewal of Derogation is required

Derogations are valid for a period of one year, and must be renewed if milk quality continues to fall outside of the Turkey requirements. Derogations are applied retroactively if the milk supplier makes the request in a reasonable time frame (see

Program Instructions, "10.0. Milk Supplier's Responsibility" part A.2.).

When the derogation expires, if the farm's rolling mean is in compliance with Turkey requirements for Somatic Cell Count (SCC) which is 400,000 cells/ml or less and Standard Plate Count (SPC) is 100,000 cells/ml or less, then no notification or request for derogation to AMS is required. Monitoring activities and calculation of rolling means will continue as described in Program Instructions "VI. Milk Supplier's Responsibility".

1. Requirements for Derogation Renewal.

- a)For a farm to be eligible for renewal of a derogation, one of the following must occur:
 - (1) Acknowledgement of at least two corrective actions shall be documented for the second derogation
 - (i.e., for the first renewal after the initial derogation).
 - (2)The farm was in full compliance for at least one month since its last derogation. (The rolling mean decreased below 400,000 cells/ml for those farms with a SCC derogation or below 100,000 cells/ml for those farms on SPC derogation.)
 - (3) The current rolling Geometric Mean (GM) is less than the GM for the same months a year earlier, i.e., May, June, and July of 2012 compared with May, June, and July of 2013, where the GM for 2013 is less.

Additionally, the farm must hold an active permit for producing milk issued by the State.

11.2 Corrective Actions

When a farm is out of compliance and operating under a derogation, out of compliance monitoring and progress on the corrective action plan is expected to continue during the derogation period.

AMS will charge the milk supplier an administrative fee of 2 hours at the current <u>Federal Register</u> published rate for Dairy Program services for each derogation (seasonal or otherwise) and derogation renewal application.

The following are examples of appropriate corrective actions a farm may conduct to bring their counts into compliance. (List is not comprehensive):

- Develop an action plan to reduce SCC /SPC.
- Review milking equipment condition and sanitation protocols
- Consult with a local veterinarian or extension agent
- Consult with the milk supplier representative or field staff
- Review and update milking routine protocols, as necessary
- For SCC:
 - Review or update a mastitis control program

- Routinely sample individual cow milk for SCC
- Review or update culling program, emphasizing cows with a high SCC or mastitis

To be eligible for subsequent renewals the farm must be able to demonstrate that the corrective actions are improving the milk quality or show that new or additional corrective actions are being implemented. All corrective actions must be disclosed on the "Affidavit for Producer Corrective Action" or a similar form. This documentation will be reviewed during the AMS Dairy Programs review of records to verify compliance with Turkey regulations.

Example: Determining When Renewal of a Derogation is Required

A milk supplier was granted SCC derogations for Farms "A", "B", "C", "D" and "E" in May 2012. These derogations will expire on April 30, 2013. When the April 2013 numbers are received (in early May), the rolling 3-month means for SCC are greater than 400,000. The milk supplier reviews the following data for each farm:

Farm A			
Month	Monthly data for rolling three- month mean for	If result of rolling three- month mean	Actions
May 2013	Feb, Mar, Apr 2013	> 400,000	No immediate renewal
April 2013	Jan, Feb, Mar 2013	< 400,000	of derogation needed.
Mar 2013	Dec 2012, Jan 2013, Feb 2013	< 400,000	Notify AMS that SCC mean
Feb 2013	Nov 2012, Dec 2012, Jan 2013	< 400,000	was out of compliance in May.
	Fa	ırm B	
May 2013	Feb, Mar, Apr 2013	> 400,000	No immediate renewal
April 2013	Jan, Feb, Mar 2013	< 400,000	of derogation needed.
Mar 2013	Dec 2012, Jan 2013, Feb 2013	> 400,000	Notify AMS that SCC mean
Feb 2013	Nov 2012, Dec 2012, Jan 2013	< 400,000	was out of compliance in May.
Farm C			
May 2013	Feb, Mar, Apr 2013	> 400,000	No immediate renewal
April 2013	Jan, Feb, Mar 2013	> 400,000	of derogation needed.
Mar 2013	Dec 2012, Jan 2013, Feb 2013	< 400,000	Notify AMS that SCC mean

Feb 2013	Nov 2012, Dec 2012, Jan 2013	< 400,000	was out of compliance in April. (Note: Going forward, if also high in June and July, a derogation will need to be requested.)
	Fa	arm D	
May 2013	Feb, Mar, Apr 2013	> 400,000	No immediate renewal
April 2013	Jan, Feb, Mar 2013	> 400,000	of derogation needed.
Mar 2013	Dec 2012, Jan 2013, Feb 2013	> 400,000	Notify AMS that SCC mean
Feb 2013	Nov 2012, Dec 2012, Jan 2013	< 400,000	was out of compliance in March. (Note: Going forward, if also high in June, a derogation will need to be requested.)
	E.	arm E	
May 2013		> 400,000	
April 2013	Feb, Mar, Apr 2013 Jan, Feb, Mar 2013	> 400,000	- Immediate renewal
Mar 2013	Dec 2012, Jan 2013, Feb 2013	> 400,000	of derogationneeded.
Feb 2013	Nov 2012, Dec 2012, Jan 2013	> 400,000	Request renewal from AMS.

Appendix A. Calculation of Rolling Geometric Mean (G.M.)

Turkey uses a rolling geometric mean to determine compliance with the somatic cell and bacterial standard plate—count requirements of Regulation on Specific Hygiene Rules for Food of Animal Origin. AMS Dairy Programs certification will recognize rolling geometric means of results from samples of raw milk from individual farms taken once per month over a three- month period for somatic cell count and twice per month over a two-month period for bacterial standard plate—counts.

(Note many calculators have a key labeled "X1/y" which can be used to calculate the geometric mean. "X" equals the result from B below and "y" equals 3. Some computer spreadsheet software programs have a geometric mean calculation function.)

Somatic Cell Count Example Calculations:

- A. Determine the farm's somatic cell count for each of the prior two months and the current month (3 months).
- B. Multiply the three monthly results.
- C. Compute the cube root of the result from B to obtain the geometric mean. Round the result to the nearest thousand.

Monthly Somatic Cell Count	Geometric Mean
Month #1 – 400,000	
Month #2 – 350,000	
Month #3 – 300,000	348,000 for Month #3
Month #4 – 600,000	398,000 for Month #4
Month #5 – 400,000	416,000 for Month #5
Month #6 – 250,000	391,000 for Month #6

$$G.M.(Somatic\ Cell\ Count) = \sqrt[3]{Month1 \times Month2 \times Month3}$$

G.M. = 348.000 for Month#3

Bacterial Standard Plate Count Example Calculations:

(Note many calculators have a key labeled "X1/y" which can be used to calculate the geometric mean. "X" equals the result from B below and "y" equals 4. Some computer spreadsheet software programs have a geometric mean calculation function.)

- A. Determine the farm's bacterial standard plate count average from samples taken from the farm for two separate randomly selected days per month. Obtain two bacterial counts from the current month and two from the prior month for a total of four.
- B. Multiply the four counts.
- C. Compute the fourth root of the result from B to obtain the geometric mean. Round the result to the nearest thousand.

Bacterial Standard Plate Count Average Values	Geometric Mean
Month $#1$ – Sampling $#1$ (Month 1_1) – $45,000$	
Month #1 – Sampling #2 (Month1 ₂) – 25,000	
Month #2 – Sampling #1 (Month2 ₁) – 20,000	
Month #2 – Sampling #2 (Month2 ₂) – 15,000	24,000 for Month #2
Month #3 – Sampling #1 (Month3 ₁) – 70,000	
Month #3 – Sampling #2 (Month3 ₂) – 50,000	32,000 for Month #3

$$G.M.(Bact.) = \sqrt[4]{Monthl_1 \times Monthl_2 \times Monthl_2 \times Monthl_2}$$

G.M. = 24,100 for Month #2

Exhibit 1.B.1 – Certificate of Conformance - Applicant Turkey Certification

(This Certificate of Conformance must be provided with each request for health certificates issued by the Dairy Grading Branch, Dairy Programs, Agricultural Marketing Service, United States Department of Agriculture, for shipments to Turkey. The Certificate of Conformance shall be provided on company letterhead that includes company name, address, and phone number. This Certificate of Conformance shall be signed and dated for each shipment of product; "blanket certificates" are not acceptable.)

Certificate of Conformance

Applicant Turkey Certification:

I hereby certify that all of the dairy products and/or dairy ingredients used for the production of the products included in the attached request for certification were produced from raw milk meeting the somatic cell (400,000 per ml.) and bacterial standard plate count (100,000 per ml.) requirements of Regulation on Specific Hygiene Rules for Food of Animal Origin.

The signer of this Certificate of Conformance acknowledges sole responsibility for maintaining adequate records to trace the production and Certificates of Conformance for all dairy products or ingredient use in the products presented for certification. Failure to maintain such records will cause ineligibility to receive certifications to the European Union.

Signature and title of individual providing certification

Date

PRODUCT NAME, LOT NUMBERS AND MANUFACTURING DATES COVERED BY THIS CERTIFICATE OF CONFORMANCE ARE LISTED BELOW:

Exhibit 1.B.2 - Certificate of Conformance - Processors of Dairy Ingredients and/or Products

(This Certificate of Conformance must be provided with each consignment of dairy products for which a health certificate for shipment to the Turkey will be requested form the Dairy Grading Branch, AMS. The Certificate of Conformance shall be provided on company letterhead that includes company name, address, and phone number. This Certificate of Conformance shall be signed and dated for each shipment of product; "blanket certificates" are not acceptable.)

Certificate of Conformance

Processors of Dairy Ingredients and/or Products:

I hereby certify that all of the dairy products and/or dairy ingredients used for the production of the products included in the attached consignment were produced from raw milk meeting the somatic cell (400,000 per ml.) and bacterial standard plate count (100,000 per ml.) requirements of Regulation on Specific Hygiene Rules for Food of Animal Origin.

The signer of this Certificate of Conformance acknowledges sole responsibility for maintaining adequate records to trace the production and Certificates of Conformance for all dairy products or ingredient use in the products covered by this certificate. Failure to maintain such records will cause ineligibility to receive certifications to the European Union.

Signature and title of individual providing certification

Date

PRODUCT NAME, LOT NUMBERS AND MANUFACTURING DATES (MONTH) COVERED BY THIS CERTIFICATE OF CONFORMANCE ARE LISTED BELOW:

Exhibit 1.B.3 - Certificate of Conformance - Milk Supplier

(This Certificate of Conformance must be provided by suppliers with each shipment of dairy ingredients used in product manufactured for shipment to the Turkey. The Certificate of Conformance shall be provided on company letterhead that includes company name, address and phone number. This Certificate of Conformance shall be signed and dated by the supplier for each shipment of product; "blanket certificates" are not acceptable. All lot numbers must be traceable to the production records of product certified by Dairy Grading Branch, Dairy Programs, Agricultural Marketing Service, United States Department of Agriculture for shipment to the Turkey.)

Certificate of Conformance

Milk Supplier:

I hereby certify that the milk products included in the attached manifest were produced from raw milk meeting the somatic cell (400,000 per ml.) and bacterial standard plate count (100,000 per ml.) requirements of the Regulation on Specific Hygiene Rules for Food of Animal Origin.

Signature and title of individual providing	
certification	Date

PRODUCT NAME, LOT NUMBERS AND MANUFACTURING DATES COVERED BY THIS CERTIFICATE OF CONFORMANCE ARE LISTED BELOW:

Border Inspection Posts (BIP) in Turkey

Port	Port Code	Туре
Agri	TR AJI	Airport
Ankara	TR ANK	Airport
Antalya	TR AYT1	Ship Port
Antalya	TR AYT	Airport
Ardahan	TR ARD	Airport
Artvin	TR AVN	Airport
Bursa	TR BTZ	Airport
Canakkale	TR CKZ	Ship Port
Edirne	TR EDI	Ship Port
Hatay	TR HAT	Airport
Igdir	TR IGD	Airport
Istanbul	TR IST1	Ship Port
Istanbul	TR IST	Airport
Izmir	TR IZM1	Ship Port
Izmir	TR IZM	Airport
Mersin	TR MER	Ship Port
Mugla	TR MUG	Airport
Sakarya	TR SAK	Airport
Samsun	TR SSX1	Ship Port
Samsun	TR SSX	Airport
Sirnak	TR SNK	Airport
Tekirdag	TR TEK1	Ship Port
Tekirdag	TR TEK	Airport
Trabzon	TR TZX1	Ship Port
Trabzon	TR TZX	Airport
Van	TR VAN	Airport
Yalova	TR YAL	Ship Port
Zonguldak	TR ZON	Ship Port

Harmonized System (HS) code for Dairy Products to Turkey

 * Note: To obtain an AMS Dairy Health Export Certificate the foodstuff must contain at least 10 percent dairy ingredients.

Code	Description
0401	milk and cream, not concentrated or sweetened
0402	milk and cream, concentrated or sweetened
0403	buttermilk, yogurt, kephir etc, flavored etc or not
0404	whey & milk products nesoi, flavored etc. or not
0405	butter and other fats and oils derived from milk
0406	cheese and curd
1702	Other sugars, including chemically pure lactose, maltose, glucose and fructose, in solid form; sugar syrups not containing added flavouring or colouring matter; artificial honey, whether or not mixed with natural honey; caramel
1901	Malt extract; food preparations of flour, groats, meal, starch or malt extract, not containing cocoa or containing less than 40 % by weight of cocoa calculated on a totally defatted basis, not elsewhere specified or included; food preparations of goods of headings 10401 to 0404, not containing cocoa or containing less
2101	Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or maté; roasted chicory and other roasted coffee substitutes, and extracts, essences and concentrates thereof
2102	Yeasts (active or inactive); other single-cell micro-organisms, dead (but not including vaccines of heading No 3002); prepared baking powders:
2105	Ice cream and other edible ice, whether or not containing cocoa
2106	Food preparations not elsewhere specified or included
2835	Phosphinates (hypophosphites), phosphonates (phosphites), phosphates and polyphosphates:
3501	Casein, caseinates and other casein derivatives; casein glues:
3502	Albumins (including concentrates of two or more whey proteins, containing by weight more than 80% whey proteins, calculated on the dry matter), albuminates and other albumin derivates:
3504	Peptones and their derivatives; other protein substances and their derivatives, not elsewhere specified or included; hide powder, whether or not chromed:

EXHIBIT 4 - Health Certificate for Dairy Products to Turkey

Health Certificate for dairy products derived from milk of cows, ewes, goats and buffaloes for human consumption from the United State of America to the Republic of Turkey

	I.1 Consignor / Gönderen	I.2 Certificate reference No / Sertifika referans numarası 1.2.a	
	Name / Adı Address / Adresi	I.3 Central competent authority / Merkezi yetkili otorite	
	Address / Adresi	I.4 Local competent authority / Yerel yetkili otorite	
	Tel No /:		
	I.5 Consignee / Alıcı	1.6	
	Name / Adı		
int	Address / Adresi		
signme	Postcode / <i>Posta kodu</i> Tel No / :		
Part I. Details of dispatched consignment Bölüm 1: Sevkiyata ait detaylar	I.7 Country of Origin ISO code Origin Ülkesi ISO Kodu I.8 Region of Origin Code Kodu	I.9 Country of ISO Code Destination ISO Kodu Varış ülkesi	
pa ait		TURKEY TR	
of dis kiyata	I.11 Place of origin / <i>Orjin Yeri</i> Name / <i>Adı</i> Approval Number / <i>Onay No</i>	1.12	
Details 1: Sev	Address / Adresi		
t. üm			
Par Böl	I.13 Place of loading / Yükleme Yeri	I.14 Date of departure / Çıkış tarihi	
	I.15 Means of transport / Nakliye aracı Aeroplane / Uçak Ship / Gemi	I.16 Entry BIP in TR / TR'ye giriş yeri	
	Aeropiane / Oçuk 🖂 Sinp / Geim 🖂		
	Identification / Kimliği:	1.17	
	Documentation references / Doküman referansları		
	I.18 Description of commodity / Malın Tanımı	I.19 Commodity code (HS code) / Malin Kodu (HS)	
		I.20 Quantity/ MİKTAR	
	I.21 Temperature of product	I.22 Number of packages	
	Ürünün İsisi	Paket sayısı	
	Ambient / <i>Oda sıcaklığı</i> Chilled / <i>Soğutulmuş</i> 🗌	Frozen / Dondurulmuş 🗌	
	1.23 Seal/Container number Mühür/konteyner no	I.24 Type of packaging Paketlemenin türü	
	I.25 Commodities certified for / Mallar:	<u>l</u>	
	Human consumption / insan tüketimi icin onaylidir 🔲 id	cin onaylidir	
	1.26	7 For import or admission into Turkey / Türkiye'ye ithalatı veya girişi için	
	1.28 Identification of the commodities / Malların Tanımı		
		Not	
	Number of Species (Net Scientific weight	
	Manufacturing plant packages nar	me) Net Batch number	
	Üretim tesisi Paket sayısı Türü (Bil	imsel ad) ağırlık Parti numarası	

Part II: Certification Bölüm II: Sertifikasyon

II.1 Animal Health Attestation / Hayvan Sağlığı Beyanı

II.1 I, the undersigned government official, hereby declare that the milk and milk products described above meet the conditions mentioned below:/

Ben, aşağıda imzası olan hükümet yetkilisi, yukarıda belirtilen süt ve süt ürünlerinin aşağıdaki şartları karşıladığını onaylarım:

Has been obtained from animals:/ Aşağıdaki şartları karşılayan hayvanlardan elde edilmiştir:

- (i) under the control of the competent authority for the control of animal health and public health,/ Halk sağlığı ve hayvan sağlığının kontrolu için yetkili otoritenin kontrolü altında olan,
- (ii) which were in a country or part thereof free from foot and mouth disease without vaccination and rinderpest;/ Siğir vebasi ve şap hastalığından (FMD) aşısız ari olan ülkede ya da bir bölgesinde bulunan,
- (iii) belonging to holdings (establishments) which were not under restriction due to foot and mouth disease or rinderpest;/ Siğir vebası veya sap hastalığı nedeniyle kısıtlama altında olmayan isletmelere ait olan,
- (iv) has been derived from animals in a herd free from bovine tuberculosis and brucellosis according to the OIE requirements;/ OIE gerekliliklering göre siğir tüberkulozu ve brusella hastalıklarından ari sürüdeki hayvanlardan elde edilen,
- (v) If the milk was derived from animals not meeting the (iv) above, it must be treated in accordance with one of the following treatments, which are consistant with Article 54 of the Turkish regulation on "Specific Hygiene Rules for Food of Animal Origin":/ Eğer süt yukarıdaki (iv) maddesini karsılamayan hayvanlardan elde edilmişse, "Hayvansal Orijinli Gıdalar icin Spesifik Hijyen Kuralları" hakkındaki Türk mevzuatının 54 üncü maddesi ile uyumlu olan asağıdaki işlemlerden bir tanesine uygun olarak muamele edilmiştir;
 - (1)1. Either, subjected to pasteurisation; / Ya pastörizasyona tabi tutulmuştur;
 - (1)2. Or, subjected to a combination of control measures with equivalent performance as described in CODEX Alimentarius Code of Hygienic Practice for Milk and Milk Products/ Ya da Süt ve Süt Ürünleri Hijyen Uygulamaları Kodunda tanımlanan eşit performanslı kontrol önlemlerinin bir kombinasyonuna tabi tutulmuştur.

II.2 Public Health Attestation/ Halk Sağlığı Beyanı

l, the undersigned responsible government official, declare that the milk or milk products described in the First Chapter of the certificate mentioned above are produced according to the conditions mentioned below:/ Ben, aṣaǧida imzası olan sorumlu hukumet yetkilisi, sertifikanin birinci bolumde tanımlanan süt ve süt ürünlerinin aṣaǧidaki ṣartlara uygun olarak üretildiğini beyan ederim:

- (a) was manufactured from raw milk:/ Aşağıdaki şartları karşılayan çiğ sütten üretilmiştir:
 - i) that comes from an establishment registered with the competent authority./ Yetkili otoriteye kayitli bir isletmeden gelmistir.
 - ii) that comes from an establishment checked regularly by the competent authority using standards that meet or exceed the Chapter XII of the "Regulation on specific rules for the organization of official controls on products of animal origin." / "Hayvansal Orijinli Ürünlerde Resmi Kontrollerin Organizasyonu icin Spesifik Kurallar Yönetmeliği"nin Bolum XII kısmını karsılayan ya da daha üstünde standartlar kullanılarak yetkili otorite tarafından duzenli olarak kontrol edilen bir işletmeden gelmistir.
 - iii) which complies with the guarantees on the residues status of raw milk provided by the monitoring plans for the detection of residues or substances submitted in accordance with "Implementing Regulation on the measures with regard to the monitoring of substances and the residues of these in live animals or animal products." / "Canli Hayvanlar ve Hayvansal Ürünlerde Belirli Maddeler ile Bunların Kalıntılarının İzlenmesi için Alınacak Önlemlere Dair Yönetmelik"e uygun olarak kalıntı veya maddelerin tespiti için olan izleme programları tarafından sağlanan çiğ sütün kalıntı statüsüne dair sunulan garantiler karşılanmaktadır.
 - iv) which meets the somatic cell and bacterial standard plate count criteria laid down in Annex I of the "Regulation on Specific Hygeine Rules for Food of Animal Origin" and which was produced, collected, cooled, stored and transported in accordance with the hygiene conditions laid down in Chapter XIII of the same regulations. "Hayvansal Orijinli Ürünlerde Resmi Kontrollerin Organizasyonu için Spesifik Kurallar Yönetmeliği'nin Ek-1'inde belirtilen somatik hücre ve bakteriyel standart plak sayısı kriterlerini karşılamaktadır ve aynı yönetmeliğin Bölüm XIII'ünde yer alan hijyen şartlarına uygun olarak üretilmiş, toplanmış, soğutulmuş, depolanmış ve nakliye edilmiştir.
 - v) which has been produced under conditions guaranteeing compliance with the maximum residue limits for pesticides/contaminants/pharmacologically active substances laid down in the relevant Turkish legislations/Turkish Food Codex/EU legislation./ İlgili AB Mevzuatı/ Türk Gıda Kodeksi/ Türk Mevzuatlarında belirtilen pestisitler/bulaşanlar/ farmakolojik aktif maddeler için maksimum kalıntı limitlerine uygunluğu garanti eden koşullar altında üretilmiştir.
- (b) It comes from an establishment that is subject to requirements that are based on HACCP principles/ HACCP ilkelerine dayalı bir program uygulayan işletmeden gelmektedir.
- (c) Food operators operate under food safety requirements designed to ensure that raw milk and colostrum admitted for use in production meets standards which meet or exceeds the outcomes provided by the hygiene requirements Chapter 13 of "Regulation of Special Hygiene Rules for Animal Food."/ Gıda işletmecileri işletmelerini üretimde kullandıkları çiğ süt ve kolostrumun "Hayvansal Gıdalar İçin Özel Hijyen Kuralları Yönetmeliği"nin Bölüm 13'deki hijyen şartlarını karşıladığını veya daha üstünde olduğunu garanti etmek üzere gıda güvenliği şartları altında işletir.
- (d) If the food business operator (i.e., manufacturer/processor) implements heat treatment on raw milk, colostrum, dairy products, or colostrum-based products, the specific level of heat treatment will be implemented according to requirements that are based on HACCP principles. The requirements are as follows:/ Eğer gıda işletmecisi (örn. üretici/ işleyici) çiğ süt, kolostrum, süt ürünleri veya kolostrum bazlı ürünlerde ısıl işlem uyguluyorsa, HACCP ilkeleri temelinde olan şartlara uygun olarak ısıl işlemin spesifik düzeyi uygulanacaktir. Şartlar asağıdaki gibidir;
 - (1)i) Either Pasteurization; including the combination of short term high temperature applied minimum 72 °C for 15 seconds or long term low temperature applied at least 63 °C for 30 minutes or other time-temperature combinations providing equivalent impact and process that allows products to show negative reaction when they are tested for alkaline phosphatase test right after this implementation / ya pastörizasyon; minimum 72 °C'de 15 saniye uygulanan kısa süreli yuksek ısı kombinasyonu veya en az 63 °C'de 30 dakika uygulanan uzun süreli düşük ısı veya aynı etkiyi sağlayan ısı zaman kombinasyonlarıyla işlem görmeli ve bu uygulamadan sonra alkalin fosfataz testine tabi tutularak negatif reaksiyon göstermelidir.
 - (1)ii) Or Ultra high temperature(UHT); a process guaranteeing microbiological stability of products packed aseptically according to the suitable temperature-time combination which may include short term constant high temperature which should not be lower than 135 °C, showing that the processed product does not have spores having the ability to generate live microorganisms or development when preserved in the room temperature after 30 °C for 15 days or 55 °C for 7 days incubation of closed packages or after the implementation of a different method / ya da Ultra yuksek ısı (UHT); 135 °C den az olmamak kaydıyla kısa süreli sabit yuksek ısıyı da içerebilen uygun ısı -zaman kombinasyonuna uygun olarak aseptik olarak paketlenmis ürünlerin mikrobiyolojik olarak stabilitesini garanti eden bir islem, bu islem işlenmis ürünlerin değişik bir methodun uygulanmasından sonra veya paketlenmiş ürünlerin 15 gün 30 °C veya 7 gün 55 °C'de inkubasyonundan sonra oda ısısında muhafaza edildiğinde canlı mikroorganizmaların üremesi veya qelismesi yeteneğine sahip sporları içermedigini gösterir.

(1)iii) For the products with HS code 19.01 and 21.06 one of the following processes / 19.01 ve 21.06 HS kodları için aşağıdaki işlemlerden bir tanesi uygulanacaktır;

- (1)1. A sterilization process with equivalent at least 121 °C for 3 minutes: / En az 121 C°'de 3 dakikaya esdeğer bir sterilizasyon islemi: (1)2. An ultra-high temperature (UHT) treatment at not less than 135 °C in combination with a suitable holding time;/ uygun bir tutma süresi ile 135 °C'den daha düşük olmayan bir 'ultra yüksek ısı' (UHT) işlemi; ⁽¹⁾3. A HTST treatment with a pH below 7.0;/ pH 7 nin altında bir HTST islemi;
- (1)4. A HTST treatment combined with another physical treatment by;/ aṣaḡɪdaki fiziksel işlemlerden biri ile kombine şekilde bir HTST işlemi; lowering the pH below 6 for one hour,/ Bir saat için pH değerinin 6'nın altına düşürülmesi, Either/ ya,

Or/ ya da, additional heating equal to or greater than 72 $^{\circ}$ C, combined with desiccation/ kurutma ile kombine edilmiş 72 $^{\circ}$ C ye esit veya daha fazla ek ısıtma

- (e) The packing of the milk and milk products or colostrum or colostrum based products as well as liquid milk based products was done by closing device that will prevent contamination after final heat treatment after the milking. Products were transported with identification marks that allow the traceability. / Süt ve süt ürünleri veya kolostrum veya kolostrum bazlı ürünler veya likit süt bazlı ürünlerin paketlenmesi, sağımdan sonra ve son ısı işleminden sonra kontaminasyonu önleyecek bir kapatma aleti ile yapılmıştır. Ürünler izlenebilirliği sağlayan tanımlama işaretleri ile
- (f) It meets the relevant criteria laid down in article 57 of "Regulation on Specific hygiene Rules for Food of Animal Origin" and the relevant microbiological criteria laid down in "Regulation on Turkish Food Codex Microbiological Criteria"/ "Hayvansal Gıdalar İçin Özel Hijyen Kuralları Yönetmeliği"nin 57 nci maddesindeki ilgili kriterleri ve "Türk Gıda Kodeksi Mikrobiyolojik Kriterler Yönetmeliği"nde belirtilen ilgili mikrobiyolojik kriterleri karşılamaktadır.
- (g) Products were prepared, packed, held and transported under a system of regulations that ensure good hygienic practice consistent with articles 10-21 of "Regulation on the Hygiene of Foodstuffs" and article 57 of "Regulation on Specific hygeine Rules for Food of Animal Origin"/ Ürünlerin hazırlanması, paketlenmesi, muamelesi ve taşınması "Hayvansal Gıdalar İçin Özel Hijyen Kuralları Yönetmeliği"nin 57 nci maddesi ve "Gıda Hijyeni Yönetmeliği"nin 10-21 nci maddelerine uyumlu olarak iyi hijyen uygulamalarını garanti eden bir mevzuat sistemi dahilinde gerçekleştirilmiştir.
- (h) The loading of the product takes place under a system of regulations that ensure that it is loaded into new containers or into containers that have been adequately sanitized./ Urünün yüklenmesi, ürünün yeni veya uygun olarak sanitize edilmiş konteynırlara yüklendiğini garanti eden bir mevzuat sistemi dahilinde gerçekleşmiştir.

Delete as appropriate/ Uygun şekilde siliniz.

- Box I.7: Provide name and ISO Code of the Country./ Madde I.7.Ülkenin adını ve ISO Kodunu belirtiniz.
- Box I.11: Name, address and approval number of the establishments of dispatch./ Madde I.11: Yükleme yapılan işletmenin adı, adresi ve onay
- Box I.15: Registration number (containers), flight number (aircraft) or name (ship). In the case of transport in containers, the total number of containers and their registration number and where there is a serial number of the seal it must be indicated in box I.23. In case of unloading and reloading, the consignor must inform the entry point of the Republic of Turkey./ Madde I.15: Kayıt numarasını (konteynırlar), uçuş numarasını (uçak) veya adı (gemi). Konteyner içindeki sevkiyatlar için, toplam konteyner sayısı ve kayıt numaraları ile mühürün seri numarası 1.23. maddede belirtilmelidir. Yükleme ve boşaltma olması durumunda, gönderen Türkiye'ye giriş noktası bilgilendirilmelidir.
- Box I.19: use the appropriate Harmonised System (HS) code: 04.01; 04.02;04.03; 04.04; 04.05; 04.06; 17.02; 19.01; 21.02; 21.05; 21.06; 28.35; 35.01; 35.02; 35.04./ Madde I.19: Uygun Kodu (HS) kullanınız: 04.01; 04.02; 04.03; 04.04; 04.05; 04.06; 17.02; 19.01; 21.02; 21.05; 21.06; 28.35; 35.01; 35.02; 35.04
- Box I.20: Indicate total gross weight and total net weight./ Madde I.20: toplam bürüt ve net ağırlığı belirtiniz.
- Box I.23: For containers or boxes, the container number and the seal number should be included./ Madde I.23: Konteynırlar ve kutular için, konteynir numarası ve mühür numarası belirtilmelidir.
- Box I.28: Manufacturing plant: Introduce the approval number of the treatment and/or processing establishment(s)./ Madde I.28: Üretim tesisi: işlendiği ve/veya aşamadan geçtiği işletmenin/işletmelerin onay numarasını belirtiniz.

Part II / Kısım II

The colour of the signature shall be different to that of the printing. The same rule applies to stamps other than those embossed or watermark./ İmza, vazı renginden farklı bir renkte olmalıdır. Avnı kural soğuk damag ve filigran dısındaki mühürler icin de uygulanır.

Responsible Government Official (Designated official signing on behalf of official veterinarian per agreement between competent authorities)/ Sorumlu Hükümet Yetkilisi (Yetkili otoriteler arasindaki anlaşmaya istinaden resmi veteriner hekim adına tayin edilen resmi yetkili)	
Name / İsim (in capital letters / Büyük harflerle)	Qualification and title / Yetkisi ve ünvanı
Date / Tarih	
Stamp / <i>Mühür</i>	
	Signature / İmza