AGRINFO

GUIDANCE

Use of antimicrobials in farmed animals in the food supply chain

PREPARING FOR NEW EU RULES FROM SEPTEMBER 2026

April 2026

Funded by the European Union

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Publisher: COLEAD, 3 Avenue du Viaduc, Bât B3A, CP 90761, 94550 Chevilly Larue, France
https://colead.link
agrinfo.eu/publications

Citation: AGRINFO (2026) *Use of antimicrobials in farmed animals in the food supply chain – Preparing for new EU rules from September 2026*. Brussels: COLEAD.

Contents

New European Union (EU) requirements on the use of antimicrobials (antibiotics, antivirals, and antiprotozoals) for **farmed animals and animal products intended for human consumption** (including aquaculture) to be exported to the EU enter into application on **3 September 2026**.

They require:

- ✓ the mandatory authorisation and listing of non-EU countries exporting animals and animal products
- ✓ competent authorities in exporting countries to sign a new attestation in the certificates accompanying consignments of these products that enter the EU after 3 September 2026.

If the exporting country is not listed, or certificates with the new attestation do not accompany the goods, animals and animal products will not be allowed on the EU market.

These requirements are different and are in addition to existing EU requirements such as residue control plans.

Guarantees must be provided that the following have not been used throughout the entire life of the food-producing animals, **from their birth to export**.

- Antimicrobials listed as **reserved for treatment of certain infections in humans** in farmed animals.[1]
- Antimicrobials (all chemical types) in food-producing animals as **growth promoters** or to increase yield.

A robust documentary system must be put in place from the very first primary producer to the exporter to avoid any disruption of trade after 3 September 2026.

Certain challenges are expected in the months/years after the Regulation enters into application in relation to long-cycle production products, preserved animal products (long shelf life), animal products sold in bulk with different origins, and derived products.

[1] This includes those producing meat (cattle, sheep and goats, pigs, horses, poultry, rabbits, and farmed game), aquaculture products (fish, crustaceans, bivalve molluscs, echinoderms, tunicates, gastropods), milk/dairy, eggs, casings, and honey; Commission Implementing Regulation 2022/1255 of 19 July 2022.

1. Introduction

As part of its fight against antimicrobial resistance (AMR), the European Union (EU) has introduced restrictions on the use of antimicrobial medicinal products (antibiotics, antivirals, antiprotozoals, and antifungals) in farmed animals that produce food to be exported to the EU (Regulation 2023/905) (see Rules on prohibited antimicrobials in imported animal products).

The new requirements affect all exporting countries to the EU, two-thirds of which are low- and middle-income countries within AGRINFO's scope.

This Guide specifies the requirements in relation to the use of antimicrobials, and highlights key points that must be addressed when implementing the new EU requirements to prevent disruptions to trade on 3 September 2026. The Guide also identifies some of the practical challenges that lower- and middle-income countries may face in meeting the new requirements, and suggests strategies to support compliance. Competent authorities and relevant stakeholders should evaluate, on a case-by-case basis, whether animal-food value chains are adequately prepared for the application of these requirements.

2. Key requirements on the use of antimicrobials

For all farm animals raised for food destined for the EU market, Regulation 2023/905 bans the use of:

- medicinal products containing an antimicrobial that is included in the list of antimicrobials reserved for treatments of certain infections in humans (see list in Annex II of this guide), and
- antimicrobial medicinal products used to promote growth or increase yield, whether or not they appear on the above-mentioned list of antimicrobials reserved for treatments of certain infections in humans.

These requirements apply during the **whole lifetime** of food-producing animals:

- meat (cattle, sheep and goats, pigs, horses, poultry, rabbits, and farmed game)
- aquaculture products (fish, crustaceans, bivalve molluscs, echinoderms, tunicates, and gastropods)
- milk/dairy products
- eggs
- casings
- honey.

To export such products to the EU from **3 September 2026**, countries must:

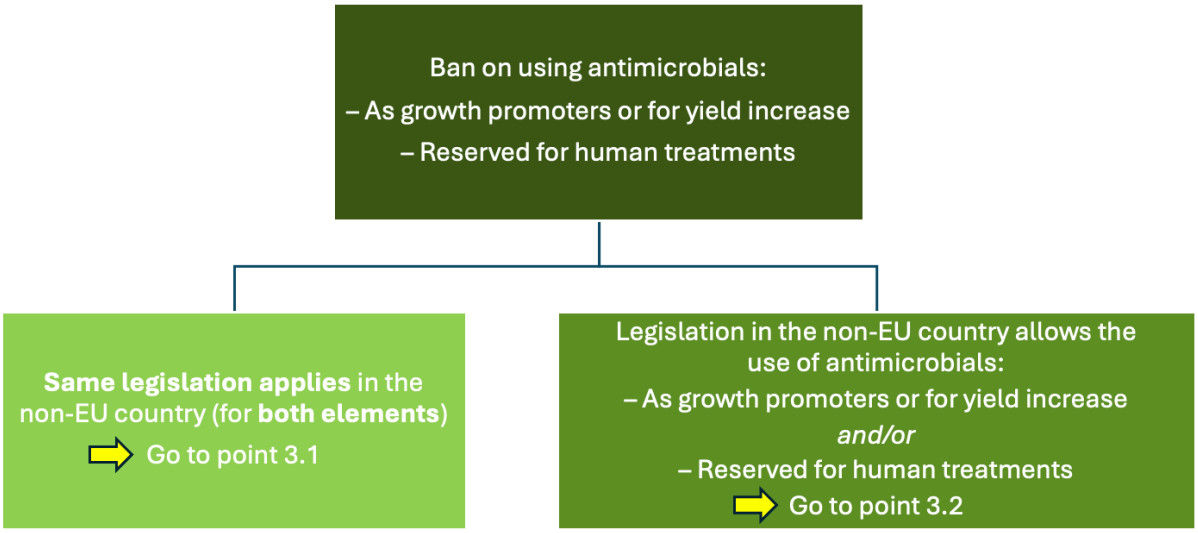
- be included in the **official list** of authorised exporting countries (confirming they are compliant with the new antimicrobial rules – the list is expected to be reviewed before 3 September 2026), *and*
- ensure that the official veterinary authorities sign the **attestation**, part of the updated official certificates, indicating that the farmed animals and food comply with the new requirements.

To sign the certificates, the authorities must be in a position to guarantee that the animal that has produced the food has never received any antimicrobials for the purpose of growth promotion or yield increase, or antimicrobials reserved for treatment of certain infections in humans.

3. Exporting country strategies to comply with antimicrobials rules

Exporting countries have adopted two main approaches to complying with the European rules, which now require different actions by stakeholders to ensure compliance from 3 September 2026.

- They have replicated EU rules on banning the prohibited antimicrobials in national legislation (see section 3.1).
- They permit the use of antimicrobials and put in place a channelling system to ensure that compliant food is traceable from the first primary producer to the export point (see section 3.2).



3.1 Exporting country's national legislation replicates EU antimicrobial bans

When the exporting country has legal requirements replicating EU rules, it is important to check:

- ☐ The date of application of the relevant national legislation: food-producing animals must have been born after the date national legislation started to apply
- ☐ Whether a system of official controls is in place
- ☐ Regarding the country of origin of the food-producing animals: were the animals moved from one or more countries? Has/have the country/ies of origin provided guarantees concerning the non-use of the prohibited antimicrobials?
- ☐ For animal products collected from several sources or traded in bulk: are the origins traceable and the guarantees provided? When a country is sourcing raw material from another country, operators must receive written guarantees from the sourcing country concerning the non-use of the prohibited antimicrobials.

Where the exporting country has legal requirements replicating EU rules *–in relation to both growth promoters/yield increase, and antimicrobials reserved for human treatments* – and has put in place effective controls and traceability systems, it can be assumed that all food produced since the legal requirements came

into application complies with EU requirements. In this case, no specific information needs to accompany the product. However, if the product is from animals **born before** the national legislation entered into application, the exporting country will need to provide guarantees that the animals have not been treated with the prohibited antimicrobials at any point in their lifetime before that application date. If, for example, the exporting country had national legislation in place since 1 January 2025, further guarantees will be required to demonstrate compliance for products from animals born before 1 January 2025 (see section 2). This may well be the case for certain beef, dairy products, casings, dried or canned products.

3.1.1 Date of application vs date of birth of the food-producing animals

Documenting the treatment of animals prior to the application of national antimicrobials legislation is particularly relevant for products that have a long cycle (dairy products, beef, casings) and for products with a long shelf-life (vacuum, frozen, processed). To be able to export such products to the EU after 3 September 2026, guarantees must be provided in relation to the food-producing animals **from their birth**. This can potentially mean a period of **2 years or more** prior to export. These guarantees are outlined in section 3.2.

3.1.2 Official controls

In addition to legislation banning the use of certain antimicrobials, exporting countries must have in place measures that ensure effective implementation of the legislation by operators along the entire food chain. In practice, this mainly concerns operators at the farm level, and potentially later steps in the supply chain where antimicrobials may be used.

Competent authorities, veterinarians, farmers, and exporters must be trained to comply with the new rules.

It is important to note that these controls are **not the same** as those foreseen for the control of residues of pharmacologically active substances, pesticides, and contaminants.

- Control plans for **residues** of pharmacologically active substances, pesticides, and contaminants are put in place for food safety reasons. They allow non-EU countries to be authorised in Regulation 2021/405 Annex -I, and the control plans must be updated every year by 31 March. The controls are performed by sampling analysis in laboratories.
- Controls of use of **antimicrobials** are not intended to ensure food safety, but rather to combat antimicrobial resistance. These controls can be based on documentary checks (e.g. the traceability of the treatments given to the food-producing animals) and other checks that national competent authorities may find relevant.

From 3 September 2026 onwards, the European Commission may start to conduct audits in non-EU countries to ensure compliance with the EU requirements.

3.2 Exporting country's national legislation does not replicate EU bans on using antimicrobials as growth promoters/for yield increase; or those reserved for human treatments

Where an exporting country does not have legislation that replicates EU requirements fully, it must put in place a robust control system covering the lifetime of the food-producing animals, from the farm to the exporter.

This entails:

- training and controls of official authorities, veterinarians, farmers, and food chain operators up to the exporter
- identifying medicines and medicated feed containing antimicrobials
- segregating production lines to exclude non-compliant animals/products
- feed and treatment records on farm, including veterinarian prescriptions for antimicrobials
- an information system that can trace products through to export, such as digitalisation, certification
- a check on the readiness of products for 3 September 2026 (depending on when systems were ready and on production cycles).

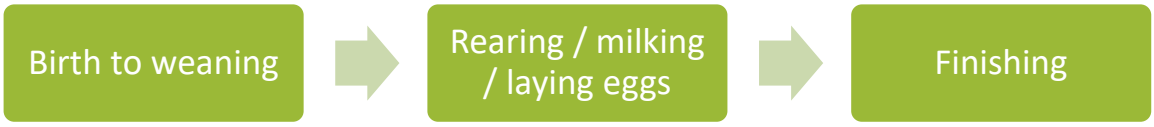
If the exporting country's legislation does not prohibit the use of antimicrobials in the same way as EU legislation, operators in that country will have to take additional steps to demonstrate that animals and animal products are compliant. To maintain exports to the EU, these steps must be accessible and affordable to all operators, including smallholders.

3.2.1 Identification of farms producing for the EU market

Farms that intend to supply the EU market must be identified. Unlike other establishments producing products of animal origin intended for human consumption, farms do not need to be approved for the EU market.[1] However, they do need to be registered by their domestic authorities and must comply with national rules.

Farms are not always part of integrated systems, which means that the decision to export to the EU may be taken by other operators further along the supply chain (wholesalers, processors). Information systems must be extensive enough to account for such scenarios.

In many cases, animals are moved between farms during their lifetime. These movements typically depend on factors such as the specialisation of individual farms, the optimisation of feed or land resources, and trade considerations. A typical cycle of production is:



To ensure compliance with the requirement to ensure that animals have not been treated throughout their whole life, each of these steps must be identified and traced.

[1] One exception is the case of Brazilian beef farms for the last 90 days before slaughter.

3.2.2 Identifying banned substances

Assess and identify

Farmers and their veterinarians must assess whether the use of antimicrobials complies with EU requirements, and must identify any necessary changes to ensure compliance.

Farmers may be familiar with the trade names of veterinary products, but not necessarily the active substances that they contain.

To ensure that any animals treated with prohibited antimicrobials will not enter a supply chain destined for the EU market, farmers and veterinarians must identify **products** containing:

- antimicrobials that can be used for growth promotion or to increase yield (this may be indicated on the packaging or in the instructions for the product)
- products containing antimicrobials reserved for treatments of certain infections in humans.

When antimicrobials are given via feed, the feed must be clearly labelled, ideally with visible markings on the packaging and, as a minimum, in the provided instructions for use.

A good solution is to create a national register of veterinary medicines and medicated feed for farmed animals, to be managed by the national competent authorities in cooperation with medicinal product feed manufacturers.

Where antimicrobials reserved for treatment of certain infections in humans are administered to animals in the exporting country, alternative treatments for animals should be sought.

Document

Farmers must document all veterinary medicines administered to animals at every stage and maintain accurate **records**.

Requiring veterinary **prescriptions** for medicines and medicated feed could enhance awareness of the implications of using products that may act as growth promoters or increase yield.

An **information leaflet** of a medicine that does not state any growth promotion effect may serve as evidence of compliance.

3.2.3 Segregation of compliant vs non-compliant production

If a farm has used antimicrobials prohibited in the EU, it must have a system in place to segregate any treated animals from those not treated, which are compliant for the EU supply chain. This can be a challenge in smallholdings, in particular in relation to dairy cows (as milk from all cows is generally mixed).

3.2.4 Certification/declaration

Information on antimicrobial use must accompany the animals, and then the products from these animals, from the first primary producer up to certification of the product for export to the EU by an official veterinarian in the exporting country.

Solutions to ensure compliance can be applied at the farm level or at the product level.

- **Certification:** One strategy for avoiding possible mistakes is to establish a system specifically dedicated to EU exports, in conjunction with an "antimicrobial-free" certification process. Some certification bodies are developing such certifications for antibiotics.[2]

[2] For example, QIMA, CSQA.

- **Declaration/attestation:** At the product level, one option could be to ask the primary producer(s) to make a declaration/attestation, similar to the existing food chain information[3] system in the meat sector, but adapted to all animal products. This could take the form of a declaration (dated and signed) certifying that no antimicrobials reserved for treatments of certain infections in humans, or antimicrobials that could be used as growth promoters or to increase yield, were administered to the animal during the period it was on the farm. This declaration could be digitalised, or attached to the commercial documentation that accompanies the animals and goods, and submitted to the official veterinarian, who would then sign the attestation in the official EU certificate accompanying goods exported to the EU.

3.2.5 Considerations of use in practice

The fight against antimicrobial resistance is an established international goal.[4] Many countries already prohibit the use in farmed animals of those antimicrobials that are reserved for treatment of certain infections in humans in the EU; or, in practice, these antimicrobials are simply not used in livestock. If this prohibition is in force and compliance can be demonstrated, whether across all species or for specific ones, there would be no need to implement a detailed traceability system. This is the case, for example, where a national compulsory register of veterinary medicines exists, and no applications have been made to market medicines containing prohibited antimicrobials.

Since 2015, the World Organisation for Animal Health (WOAH) has been collecting data on the quantities and justifications for antimicrobial use in animals. This includes information on countries with legislation on growth promoters. This information is available in the ANIMUSE database under the National data section.[5]

3.2.6 Official controls

Competent official authorities must ensure the validity of farm certifications/declarations and the effectiveness of any segregation system in place to avoid mixing compliant with non-compliant food.

As all animal product establishments in the supply chain after the farm must be EU-approved, this approval process offers an opportunity to check compliance with antimicrobial requirements (see List of non-EU country establishments – explained).

From 3 September 2026 onwards, the European Commission may start to conduct audits in non-EU countries.

[3] Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin.
[4] WHO: Improving infection prevention and control to prevent the spread of antimicrobial resistance; FAO: Antimicrobial resistance.
[5] WOAH: List of Antimicrobial Agents of Veterinary Importance for cattle, poultry, pigs, aquatic animals.

4. Challenges when animals or animal products are moved between countries

When animals or their products are moved between non-EU countries, these non-EU countries must also:

- be listed in Regulation 2024/2598
- provide written guarantees to the last country in the chain before export confirming that antimicrobials reserved for treatment of certain infections in humans, as well as those used for growth promotion/yield increase purposes, have not been used in the production of the imported consignments.

There are three possible situations to which these requirements apply.

- **Live animals moved between non-EU countries**
  If the food-producing animals are moved between countries, it must be ensured that the country(ies) of provenance or destination apply either the same EU requirements (and the animals were born after the entry into application), or have a certification/declaration system to provide guarantees. Meeting requirements only in the country in which the animal is raised first or last is not sufficient.
- **Mix of animal products from several countries of origin to form batches**
  If animal products from several countries of origin are mixed (e.g. milk/dairy products, minced meat/meat preparations, honey blends, casings, liquid or dried eggs), the products must be sourced only from countries where the legislation replicates the EU rules (section 3.1), or that have provided guarantees of compliance via a robust traceability system.
- **Animal products processed in other countries and intended to be reimported**
  Products from countries complying with EU requirements may lose their origin when they are processed in other countries. This also includes products from EU food-producing animals that may lose their EU origin when they are processed in non-EU countries. For example, over 80% of EU casings are moved to non-EU countries to be calibrated and processed. Even if the casings originate in the EU and comply with EU requirements, the country in which the casings are processed must also demonstrate compliance in order for the casings to be re-exported to the EU.

5. Challenges affecting each sector

As each animal product sector is organised differently, any systems designed to comply with EU requirements must take into account the specific complexities of that sector. For each type of commodity, this section describes the relevant model certificates, the exporting countries concerned (in AGRINFO's scope), and an overview of the production cycles and of the structure of the supply chain.

5.1 Meat

Scope

The antimicrobial attestation has been added in the following model certificates (to be signed from 3 September 2026).

- For **food**:
  - Fresh meat: BOV (beef), OVI (sheep meat/lamb), POR (pork), EQU (horsemeat), RUF (other ruminants), SUF (farmed game of wild breeds of pigs and Tayassuidae), RUM-MSM (mechanically separated meat of domestic ruminants), SUI-MSM (mechanically separated meat of domestic pigs), POU (poultry meat), RAT (ratite meat), RM (rabbit meat)
  - Meat preparations: MP-PREP
  - Meat products: MPNT (not required to undergo a specific risk-mitigating treatment) and MPST (required to undergo a specific risk-mitigating treatment)
  - PAO (other products of animal origin derived from domestic ungulates, poultry, rabbits, or fishery products).
- For **live animals**: BOV-X, BOV-Y, OV/CAP-X, OV/CAP-Y, SUI-X, SUI-Y, CAM-CER, EQUI-X, EQUI-Y, BPP, BPR, SP, SR, POU-LT20.

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries within AGRINFO scope 2019–2025 (value)
Beef	Argentina, Bosnia and Herzegovina, Brazil, Botswana, Eswatini, Montenegro, North Macedonia, Namibia, Paraguay, Serbia, Ukraine	57% chilled 73% frozen
Sheep and goat	Albania, Argentina, Bosnia and Herzegovina, Montenegro, North Macedonia, Namibia, Serbia	1.5% chilled 6% frozen
Pork	Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia, Ukraine	10% frozen
Horse	Argentina, Brazil, Serbia	63%
Farmed game	Argentina, South Africa	
Poultry	Argentina, Bosnia and Herzegovina, Brazil, China, Morocco, Moldova, Montenegro, North Macedonia, Serbia, Thailand, Türkiye, Ukraine	92%
Rabbits	Argentina, China, Serbia	96%

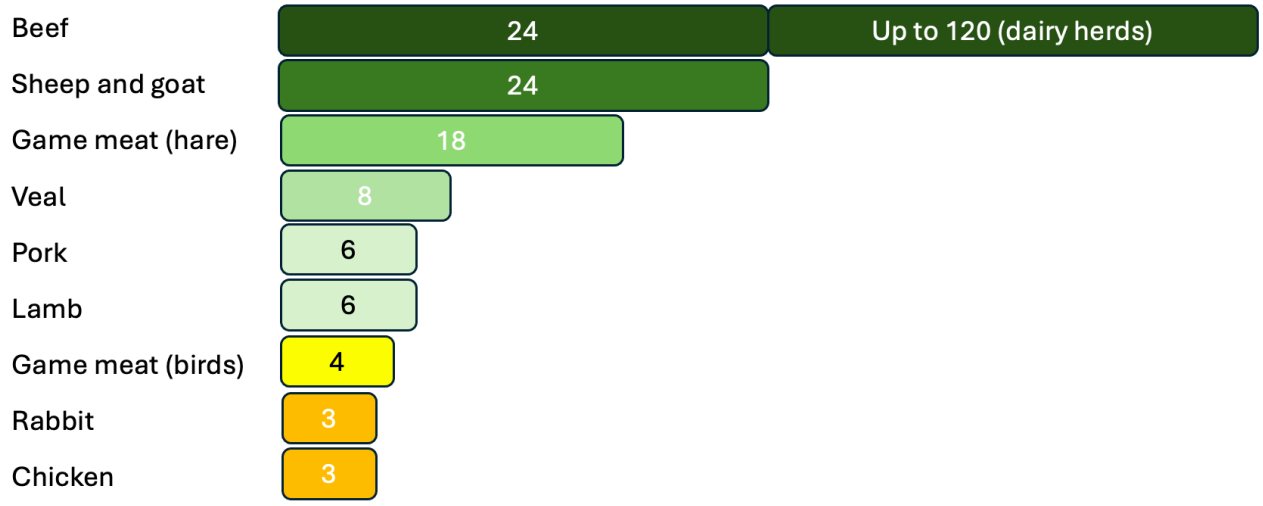
Production cycles

The cycle of meat production varies significantly by type, ranging from a few weeks for fresh poultry meat to several years for beef (typically 24–30 months) or preserved products such as frozen, processed, vacuum-packed, or canned meat.

Production systems differ depending on the species, the age of slaughter, and the target market. Meat may be sourced from young animals (e.g. veal, lamb, or broilers) and also older animals, including dairy cows or breeding stock.

Meat can be sold in various forms, including: fresh (chilled or vacuum packed), frozen, prepared, or further processed (e.g. dried, cured, cooked, or canned).

Figure 1 Examples of production cycles (in months)



Meat chain

Before reaching the slaughterhouse, animals are often moved between farms (depending on their production specialisation) or traded by livestock dealers. All operators handling live animals must maintain records of any treatments administered and pass this information to the next link in the supply chain.

Under current requirements, **food chain** information[6] regarding veterinary medicines must be shared only between the operator sending animals to the slaughterhouse and the slaughterhouse itself. For **antimicrobial uses**, this is different. The information from all farms involved must accompany the meat consignment, given that products such as minced meat, meat preparations, and batches of cuts may be produced from multiple animals and farms.

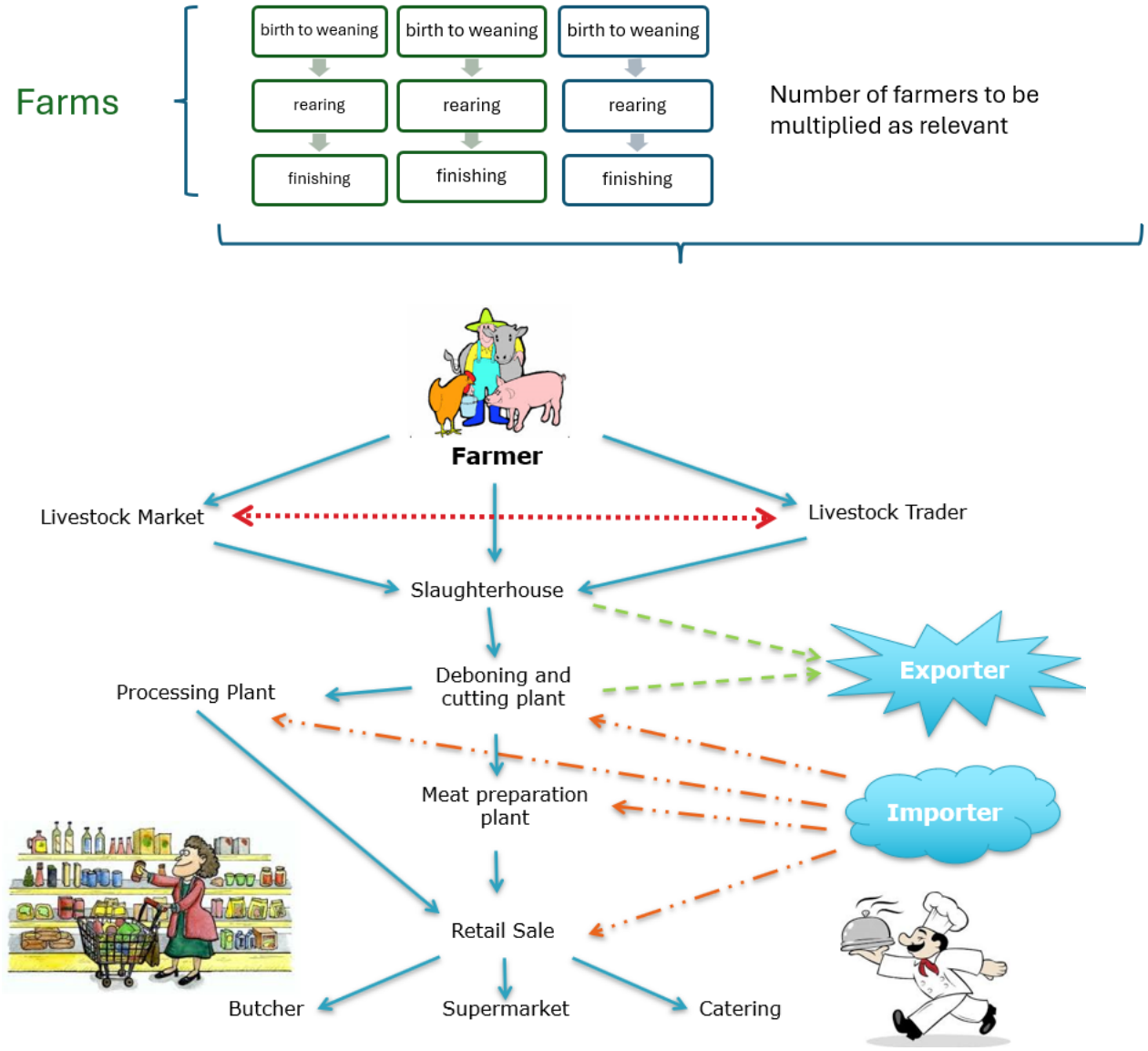
As shown in Figure 2, exports/imports can take place at any step of the chain.

Points of attention:

- ☐ Several farms involved: all farms must comply and transmit the information
- ☐ Long production cycle of some species (in particular dairy herds and reproductive animals)
- ☐ Products of different origins may be mixed (e.g. minced meat, meat preparations)
- ☐ Long shelf life of some products (e.g. frozen, dried, cured, cooked, canned).

[6] Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin.

Figure 2 Overview of the meat chain



Source: Vinci, C. and Naassens, P. (2016) UECBV Activities in Animal Welfare, European Livestock and Meat Trades Union. Second Stakeholder Consultation Meeting, OIE Animal Welfare, Brussels, 7 June.

5.2 Milk and dairy products

Scope

The antimicrobial attestation has been added in the following model certificates (to be signed from 3 September 2026): MILK-RM (raw milk), MILK-RMP/NT (dairy products derived from raw milk), DAIRY-PRODUCTS-PT (dairy products with a pasteurisation treatment), DAIRY-PRODUCTS-ST dairy products with a risk-mitigating treatment), COLOSTRUM and COLOSTRUM-BP (colostrum-based products), PAO (other products of animal origin derived from domestic ungulates, poultry, rabbits, or fishery products).

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries within AGRINFO scope 2019–2025 (value)
Milk and dairy products	Argentina, Bosnia and Herzegovina, Moldova, Montenegro, North Macedonia, Serbia, Türkiye, Ukraine	Collectively, these imports represent about 10%

Production cycle

Milking cows undergo a life cycle of birth, weaning, and rearing. Calves are separated from their mothers after birth and raised on farms. After weaning at 6–8 weeks, they are moved to group housing and reared until approximately 15 months of age, preparing them to calve at around 24 months. They are then integrated into the milking herd, bred, managed through a continuous cycle of lactation and dry periods, and bred accordingly. Cows may be around 70 months of age (5–6 years) after three calvings, while some breeds can produce milk until they reach 120 months of age.

Milk/dairy chain

During milking, the milk of the entire farm herd is pooled together and then collected by trucks.

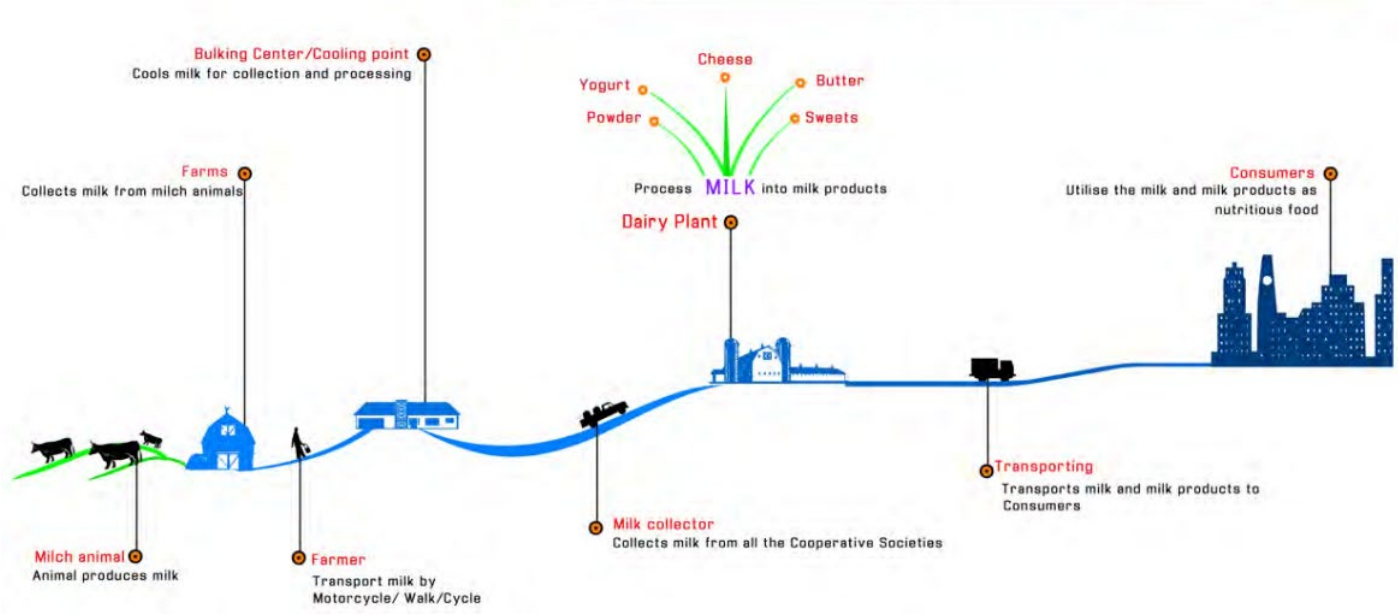
From this point forward, the milk is mixed with that from other farms throughout most stages of the dairy chain, resulting in a **disconnection from individual animals** from the farm level onwards. This mixing process complicates traceability and compliance documentation.

Notably, the country of origin for dairy products is designated as the country where the products are processed, rather than the source of the milk itself.

Points of attention:

- Several farms involved: all farms must comply and transmit the information
- Long production cycle of the animals producing milk
- Sold in bulk – several origins mixed
- Some dairy products can have a shelf life of several months/years (e.g. dry milk, cheeses, frozen)
- Dairy certificate is also used for products derived from milk, covering more than CN code 04, such as 1517, 1702, 1806, 2105, 2106, 2202 99, 2835, 3501, 3502, 3504.

Figure 3 Overview of the milk and dairy chain



Source: FAO (2014) Dairy Products Toolkit. Rome: Food and Agriculture Organization of the United Nations.

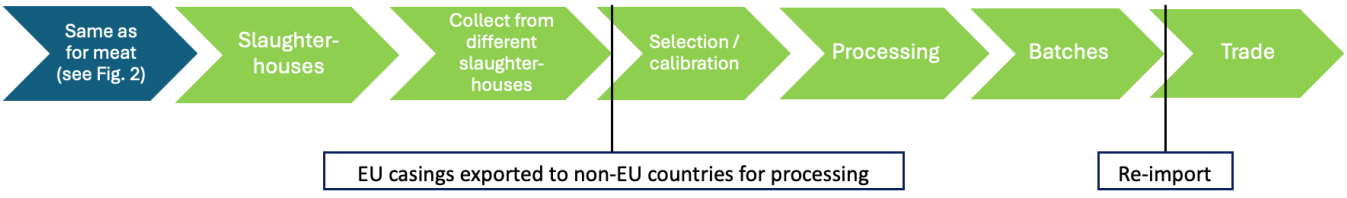
5.3 Casings

Scope

The antimicrobial attestation has been added in the model certificate for casings: CAS (to be signed from 3 September 2026).

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries within AGRINFO scope 2019–2025 (value)
Casings	Albania, Argentina, Brazil, China, Egypt, India, Lebanon, Morocco, Montenegro, North Macedonia, Mongolia, Pakistan, Paraguay, Serbia, Tunisia, Türkiye, Ukraine, Uzbekistan	Collectively, these imports represent about 87%

Production cycle



In the EU, natural casings for sausages are derived from the intestines of cattle, sheep, goats, and pigs sourced from slaughterhouses. Farmers are typically unaware of whether the intestines will be used for casing production. This decision is made by the casing company in agreement with the slaughterhouse.

Intestines are collected from slaughter animals along the slaughter line and then gathered in the gut room. From this point onwards, intestines are mixed and are no longer traceable to specific animals.

To ensure compliance with the requirements regarding the use of antimicrobials, strategies must be implemented to address this issue by:

- developing a robust system well in advance to cover the oldest ages of animals
- ensuring that only intestines from animals originating in authorised countries are mixed.

When casings are selected and calibrated, they are regrouped with other casings to form uniform batches. For economic sustainability, processing establishments need to diversify their casing suppliers. Thus, a system must be implemented to ensure that only casings from compliant origins are included in these batches.

The majority of EU casings are exported to non-EU countries for selection, calibration, and processing before being reimported. During the processing phase, casings are required to be treated with salt for a minimum of 30 days at a temperature of 20°C.

Points of attention:

- ☐ Several farms involved: all farms must comply and transmit the information
- ☐ Long production cycles (in particular dairy herds and reproductive animals): casings are collected after meat production, and they can be obtained from animals of all ages
- ☐ Sold in bulk: casings are mixed from the slaughterhouse onwards, and must be assembled from different origins to form batches of uniform size, properties, and quality
- ☐ Casings (including EU casings) lose their origin when they are exported for processing – they take the origin of the country where they are processed for the last time
- ☐ Long shelf life: after casings are salted, they can be stored for several years.

5.4 Eggs

Scope

The antimicrobial attestation has been added in the model certificate for eggs (to be signed from 3 September 2026): E (fresh eggs), EP (egg products), PAO (other products of animal origin derived from domestic ungulates, poultry, rabbits, or fishery products).

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries within AGRINFO scope 2019–2025 (value)
Eggs	Albania, Argentina, Bosnia and Herzegovina, Brazil, China, India, Moldova, Montenegro, North Macedonia, Mexico, Serbia, Thailand, Türkiye, Ukraine	Collectively, these imports represent about 50%

Production cycle

Birds usually start to lay at around 5 months (20–21 weeks) of age, and continue for about 12 months (52 weeks), with eggs production gradually decreasing as they approach the moulting period.[7]

The typical production cycle lasts approximately 17 months (72 weeks), and it is divided into three distinct phases.

- Phase 1: Small chicks or brooders. This initial phase lasts from 0 to 2 months (0–8 weeks) during which small chicks are kept in facilities (brooder houses) separate from laying birds.
- Phase 2: Growers. This phase lasts about 3 months, from the 9th to the 20th week of age. Growers may either be housed separately from small chicks, or may continue to be reared in brooder-cum-grower houses. During weeks 17 to 20, special care is crucial as their reproductive organs develop.
- Phase 3: Layers. Growers are moved to the layer house at 18 weeks. Birds generally lay for a 12-month period, starting around 21 weeks and continuing until approximately 72 weeks of age.
- Collection: Eggs are gathered manually or with mechanical systems.
- Handling and cleaning: Removing dirt and storing properly to maintain hygiene.
- Grading and sorting: Eggs are assessed by weight, shell quality, and cleanliness.
- Packaging and transport: Eggs are securely packaged and delivered to the buyer or market.

Fresh eggs are marketed and consumed in a short period of time, with markings indicating the method of production, packaging location, and quality grading.

Eggs may have a longer shelf life when frozen, cooked, or dried.

Points of attention:

- ☐ Production cycles of laying hens (5–17 months)
- ☐ Eggs are mixed to form uniform batches (date, size, quality): the age of the laying hens is not a criterion
- ☐ Eggs can be sold in bulk (white, yolk)
- ☐ Longer shelf life of cooked, dried, or preserved eggs.

5.5 Honey

Scope

The antimicrobial attestation has been added in the model certificate for honey: HON (to be signed from 3 September 2026).

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries within AGRINFO scope 2019–2025 (value)
Honey	Armenia, Argentina, Bosnia and Herzegovina, Burkina Faso, Benin, Brazil, Belarus, Cameroon, China, Cuba, Dominican Republic, Ethiopia, Georgia, Guatemala, India, Kazakhstan, Kyrgyzstan, Lebanon, Morocco, Moldova, Montenegro, Madagascar, North Macedonia, Myanmar/Burma, Mexico, Nigeria, Serbia, Rwanda, El Salvador, Togo, Thailand, Türkiye, Tanzania, Ukraine, Uganda, Viet Nam, Wallis and Futuna, Zambia	Collectively, these imports represent about 77%

[7] FAO (2003) Egg Marketing – A Guide for the Production and Sale of Eggs; Fidarfeed (2024) The Egg Production Cycle Explained: From Hen to Market-Ready Egg.

Production cycle

Lifespan:

- Bees: 1–6 months
- Queen bee: 3–5 years.

Most beekeepers harvest their honey once or twice a year.[8]

Honey blends must be produced exclusively from honey that complies with EU requirements, needing verification of the countries of origin and apiaries prior to blending.

The minimum shelf life of honey is primarily determined by its moisture content, generally lasting up to 2 years within the EU.[9]

Honey production is not affected by the ban on using antimicrobials as growth promoters.

However, for antimicrobials reserved for treatments of certain infections in humans, it is important to verify their usage in practice, as there is no reference found in sources such as WOAH.

Figure 4 Honey processing

Source: FAO (2007) Honey Processing Toolkit. Rome: Food and Agriculture Organization of the United Nations.

Points of attention:

- ☐ Small-scale production: fragmented production systems make traceability and certification more difficult
- ☐ Honey blends (different origins possible)
- ☐ Long shelf life.

5.6 Aquaculture

Scope

The antimicrobial attestation has been added in the following model certificates (to be signed from 3 September 2026): EU-FISH, FISH-CRUST-HC, FISH/MOL-CAP, MOL-HC, PAO (other products of animal origin derived from fishery products).

[8] AbeilleMarket (2026) Combien de récoltes de miel par an dans une ruche ? [How many honey harvests are there per year from a beehive?] Article, 7 February.
[9] CARI (2009) Guide de bonnes pratiques apicoles. Louvain-la-Neuve: Centre Apicole de Recherche et d'Information.

Product	Approved countries (in AGRINFO scope)	Percentage of EU imports from countries
Aquaculture	Albania, Argentina, Armenia, Azerbaijan, Bangladesh, Belize, Bosnia and Herzegovina, Brazil, China, Colombia, Costa Rica, Cuba, Ecuador, Guatemala, Honduras, Indonesia, India, Kenya, Madagascar, Malaysia, Mauritius, Mexico, Moldova, Montenegro, Morocco, Mozambique, Myanmar/Burma, Nicaragua, Nigeria, North Macedonia, Panama, Peru, Philippines, Serbia, South Africa, Sri Lanka, Thailand, Tunisia, Türkiye, Ukraine, Uganda, Venezuela, Viet Nam	73% of EU consumption of aquaculture products comes from imports[10]

Typical aquaculture production cycles

The European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) provides detailed insight into the production cycles for key species in its case studies, as follows.

- **Salmonids (salmon/trout)**: The production cycle spans approximately 3 years.
  - Stage 1 (Freshwater): Eggs are raised in hatcheries to develop smolts, reaching 100–150 g over about 1 year.
  - Stage 2 (Saltwater): Fish are transferred to sea cages, taking 12–24 months to grow to a market size of 4–5 kg.
  - Management: Stocks are graded multiple times (often 4) to ensure uniformity and reduce density.
- **Mediterranean marine fish (seabass/seabream)**:
  - Hatchery: Juveniles are produced in land-based hatcheries and sold at 1.5–2.5 g.
  - Ongrowing: Fish are transferred to sea cages or tanks and grown to a market size of 400–450 g over 18–24 months.
- **Oysters (France/Ireland)**:
  - Hatchery/collection: Spat (juvenile oysters) are either collected or produced in hatcheries.
  - Cultivation: Oysters are grown in cages or bags in intertidal areas, where they are sorted and graded over 1–3 years.
  - Harvest and post-harvest: Once they reach marketable size, oysters undergo purification (depuration), cleaning, grading, and packing.
- **Shrimps**:[11]

  The time required to raise shrimp indoors varies depending on the species, water quality, and growth objectives. Generally, it takes about 3 to 6 months to reach marketable size.[12]
  - Hatchery phase: Eggs hatch into nauplii, and progress through the zoea and mysis stages. During these stages, they feed on algae and *Artemia* until they become post-larvae.
  - Nursery/grow-out phase: post-larvae are stocked in ponds, with densities adjusted according to cultivation intensity (extensive to intensive). The cycle lasts 3–5 months, with water exchange rates gradually increasing up to 12.5% daily to maintain water quality.

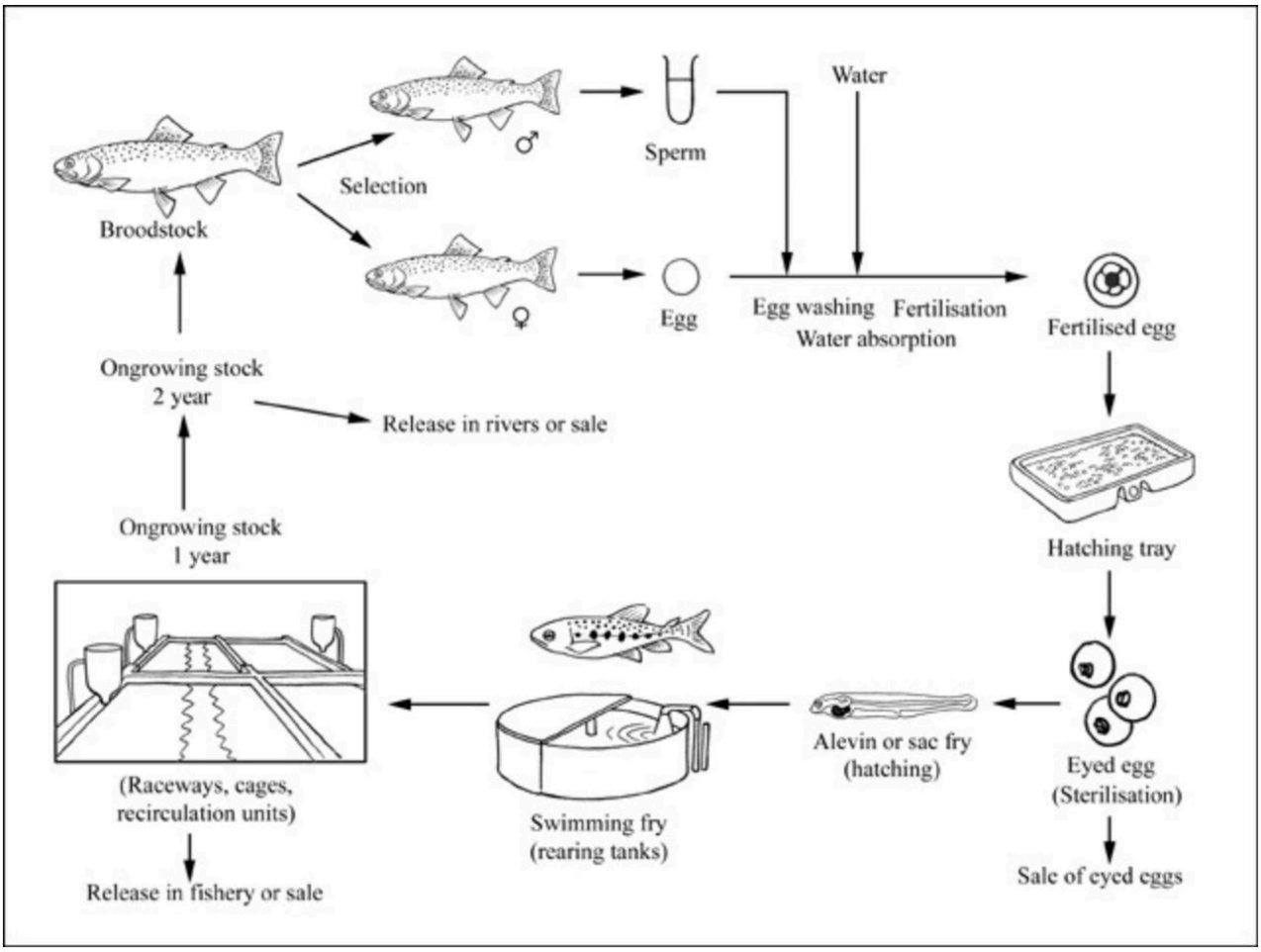
[10] European Parliament: Assessing the impact of seafood imports on EU self-sufficiency.
[11] FAO (2009) Cultured Aquatic Species Fact sheets: *Penaeus vannamei*, *Penaeus monodon*, *Macrobrachium rosenbergii*.
[12] Pangoogroup: Le Guide Complet de l'Élevage de Crevettes en Intérieur; EUMOFA:

- Harvesting: Shrimp are harvested by draining ponds or using net bags, often during spring tide to capture shrimp after moulting.
- Post-harvest: Shrimp are washed, sorted, and often processed by head removal and peeling or frozen, using techniques such as individually quick frozen (IQF).

Points of attention:

- Environmental exposure: open-water systems complicate proof that fish were not exposed to prohibited antimicrobials present in the environment
- Long shelf-life products: this sector includes many products sold frozen or shelf-stable (cans, glass jars, or aluminium/retort packaging).[13]

Figure 5 Production cycle of Oncorhynchus mykiss



Source: FAO (2026) Oncorhynchus mykiss. Cultured Aquatic Species Information Programme. Rome: Food and Agriculture Organization of the United Nations.

[13] EUMOFA: The EU fish market 2022 edition.

Annex I: Checklist examples

A. Legal and regulatory framework

- ☐ Do national laws explicitly prohibit antimicrobials reserved for treatments of certain infections in humans?
- ☐ Do national laws explicitly prohibit antimicrobial uses banned by the EU (growth promotion, yield enhancement)?
- ☐ Is there a national register of medicines and medicated feed with antimicrobials that can be used as growth promoter or to increase yield in farmed animals?
- ☐ Are these prohibitions enforceable and enforced?
- ☐ Are veterinary prescription rules aligned with EU expectations?

B. Competent authority structure and capacity

- ☐ Is there a clearly designated competent authority for certification?
- ☐ Are roles and responsibilities documented and communicated?
- ☐ Are there enough trained inspectors, veterinarians, and certifying officers?
- ☐ Are internal audit systems in place?

C. Traceability and data systems

- ☐ Can animals/products be traced from farm to export?
- ☐ Are treatment records kept at farm level and verified?
- ☐ Are digital systems available for traceability and certification?
- ☐ Can compliant and non-compliant production be segregated?

D. Certification and export controls

- ☐ Can the authority issue the new EU veterinary certificates?
- ☐ Are certifying officers trained on the new requirements?
- ☐ Are verification procedures documented?
- ☐ Are exporters audited regularly?

E. Country listing (Regulation 2024/2598)

- ☐ Is the country already on the list of authorised countries?
- ☐ If not, has an application been prepared?
- ☐ Can the country demonstrate equivalence with EU controls?
- ☐ Is the country prepared for an EU audit?

F. Stakeholder engagement

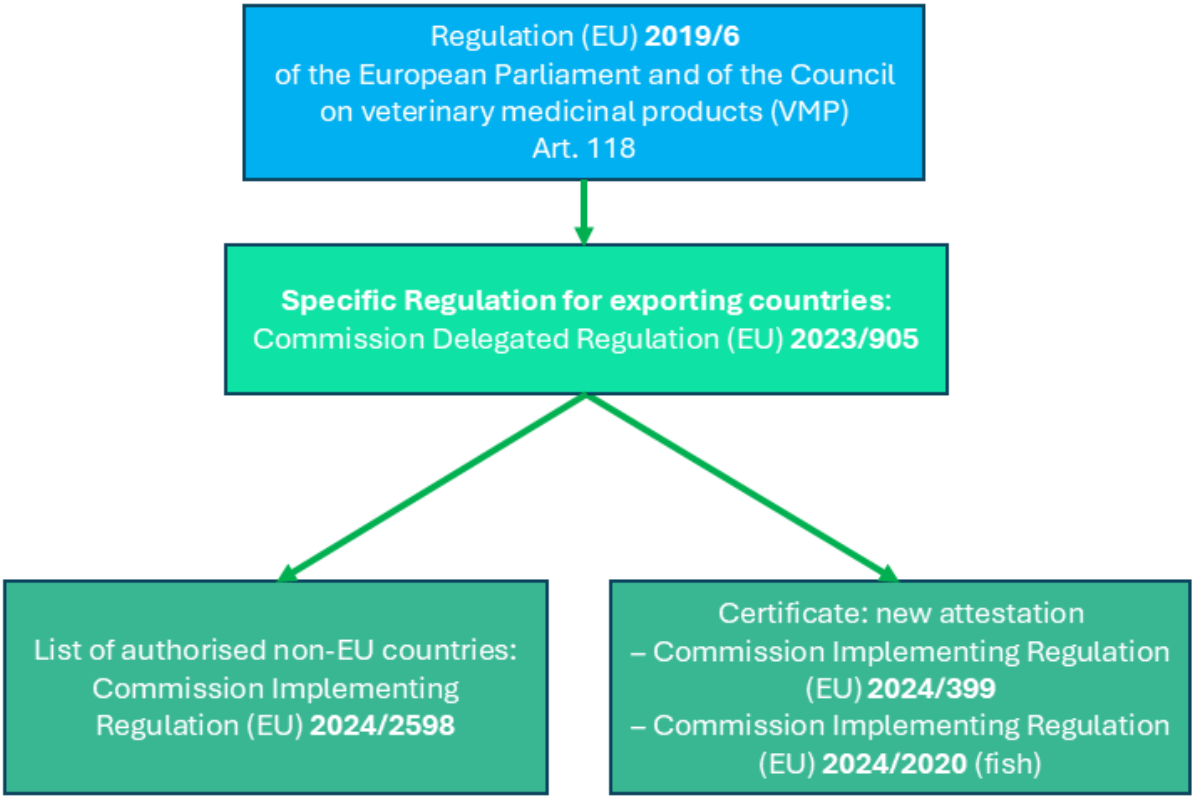
- ☐ Are farmers, their veterinarians, processors, and exporters informed of the new rules?
- ☐ Are training programmes available?
- ☐ Are industry associations involved in compliance planning?
- ☐ Can producers of medicines and medicated feeds improve the indications on the packaging?
- ☐ Do farmers, processors, and exporters have a system in place to collect and transmit the information in a way that it is linked to the food to be exported to the EU?
- ☐ Do farmers, processors, and exporters have a system in place to check that only compliant foods are mixed, and to segregate non-compliant foods?

Annex II: Antimicrobials reserved for the treatment of certain infections in humans

Antibiotics	Antivirals	Antiprotozoals
Carbapenems	Amantadine	Nitazoxanide
Carboxypenicillins	Baloxavir marboxil	
Ceftobiprole	Celgosivir	
Ceftaroline	Favipiravir	
Combinations of cephalosporins with beta-lactamase inhibitors	Galidesivir	
Eravacycline	Lactimidomycin	
Galidesivir	Laninamivir	
Glycopeptides	Methisazone/metisazone	
Glycylcyclines	Molnupiravir	
Lipopeptides	Nitazoxanide	
Monobactams	Oseltamivir	
Omadacycline	Peramivir	
Oxazolidinones	Ribavirin	
Penems	Rimantadine	
Phosphonic acid derivates	Tizoxanide	
Plazomicin	Triazavirin	
Siderophore cephalosporins	Umifenovir	
Ureidopenicillins	Zanamivir	

Source: Implementing Regulation 2022/1255, Annex

Annex III: EU legal requirements on the use of antimicrobials in farmed animals in the food supply chain



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