**Dear Sir,**

**Subject:** Request for dispensing with the introduction of integrated veterinary health certificate for import of milk and milk products into India.

We invite your kind attention to the office memorandum dated 31st March 2023 with regard to import of milk and milk products under cover of integrated veterinary health certificates incorporating sanitary requirements stipulated by the Department of animal husbandry and Dairying and also food safety requirements as per the Food safety and standards authority of India’s regulations.

Ever since the above proposal was mooted by the Ministries, based on the representations made by the trade and industry, regarding the difficulties that will be encountered by the importers, periodical extensions have been provided in implementing the above scheme and certification requirements.

As of now the last extension was given up to 30th June 2024. With regard to implementation of the integrated certificate and any further extensions with regard to such implementation we would like to submit the following for your kind consideration.

We are enclosing the import data of milk products for the year 2023 – 2024. The suppliers in respect of these shipments into the country are spread across the world covering United states of America, New Zealand, Australia and several countries in Europe including Germany.

We are constantly in contact with the suppliers from these countries for complying with the requirements stipulated in the integrated certificate to be issued for exporting milk and milk products from those countries. The suppliers have expressed the difficulties in complying with several requirements contained in the new certification stipulated by the Indian government. We also would like to highlight that since only the government authorities in those countries have to take a decision on this, both the shippers as well as we, as importers are in a helpless situation.

We understand that several countries have expressed reservations over some of the requirements stipulated by the Indian government. For example, Germany is a federal state and veterinary certificates are not issued through any centralised setup and there are hundreds of regional certification offices following their independent standards. Such practical issues in implementing the consolidated health certificate will end up in stoppage of shipments from those countries and creating scarcity for such goods in the Indian market. Such a situation will have far-reaching and undesired consequences within the country with resultant shortage of these products in the market and escalation of their prices.

Implementation of the certification requirements separately for health standards and food safety standards will, in fact, facilitate smooth trade and the agencies involved will be able to certify independently these requirements through their officials.

Because of the uncertainty involved the shippers are hesitant to ship goods, though orders have been placed for procurement with the suppliers.

Incidentally we also would like to submit that with regard to products like ‘whey powder’ and goods falling under chapters 17 and 35 of the 1st Schedule to the Customs tariff Act, they are in the nature of products processed down the line across several stages and in such cases many of the stipulations under the health certificate as envisaged now will not be relevant.

Considering the various difficulties and hardships that will be encountered by us, as importers, we request you to kindly dispense with the implementation of the requirement for integrated sanitary certificate for milk products and re-introduce the original scheme of independent certificates by DAHD and FSSAI. Such measures will greatly facilitate a hassle-free trade and at the same time ensure that the consignments comply with health certification requirements stipulated by your department and also food safety requirements stipulated separately by food safety and standards authority of India.

We request you to kindly take into consideration the above submissions in the light of practical difficulties and hardships faced by us and issue favourable orders for facilitating smooth trade and at the same time ensure compliance with the legal requirements stipulated by the Indian government.

Thanking you,