

Brexit Feed Imports – Summary

Rev 5 (Jan 21 2021)

Members are also reminded to check with brexitcall@agriculture.gov.ie or 076 106 4443 for further clarification

Step 1: EORI number and customs requirements

Register with revenue for an [EORI Number](#) as you will need this number to import goods.

You or your customs agent must complete a customs declaration for all imports. This must be done electronically through [Revenue's Automated Import System \(AIS\)](#), you will need your EORI number. A master reference number MRN will be issued when you make an import declaration.

Step 2: DAFM Registration

Check you have the relevant approval/registration with [DAFM feedstuff section](#), including requirements to register as a third country representative (see pg. 3 below). [Forms and Guidance](#) (old link) new [link](#) . [List of approved business](#).

Step 3: Notification to DAFM Feedstuffs of Imports

Complete an [Import Notification Form](#) and submit to feedimports@agriculture.gov.ie

Ensure suppliers use [ISPM 15](#) compliant pallets if product is presented on wooden pallets.

There are additional requirements for some feed products and feed materials containing products of animal origin and petfood (e.g., lactose, whey, egg products). Check on the latest list here [\(EU\) 2019/2007](#) to establish if any of your products are listed in the Annex (see Q & A pg. 2) and if they are follow step 4 to 8. These steps are also relevant to high-risk products see [Regulation \(EU\) 2019/1793](#)

Step 4: Traces Registration

Register with for Traces. DAFM will do this for you or your customs agent.

Send request to BrexitRegistration@agriculture.gov.ie or visit [DAFM](#)

The Trade Control and Expert System (TRACES) is the EU Commission's online platform for sanitary and phytosanitary certification required for importation of animals, animal products, food and feed of non-animal origin and plants into the EU, and the intra-EU trade and EU exports of animals and certain animal products.

Step 5: Supplier Check

Check on TRACES [link](#) that the product is arriving from an approved third country & approved establishment.

Step 6: Documentation

Acquire copies of the commercial documents and health certificate for the consignment you are importing. Original health certificates travel with the consignment.

Step 7: CVED-P Completion

Complete and submit a Common Veterinary Entry Document ([CVED-P](#)) at least 24 hours before arrival of the consignment to Ireland. One veterinary health cert is required with each CVED-P.

Step 8: DAFM imports portal

Submit documents through [DAFM imports portal](#) at least 24 hours before arrival of the consignment to Ireland.

The following will be required

1. MRN (master reference number) which you will get when you have made your import declaration
2. Copy of CVED-P as submitted to TRACES
3. Copy of Original Veterinary Health Certificate (scanned in colour)
4. Copy of Commercial invoice and relevant documents, packaging list etc

Arrival in Ireland must be through a Border Inspection Port . Product may/may not be selected for inspection.

- Dublin Port BCP can be contacted at (01) 615 7792 or BCP.DubPort@agriculture.gov.ie
- Rosslare Euro Port BCP can be contacted at (053) 911 4157 or RosslareBCP@agriculture.gov.ie
- Dublin Airport BCP can be contacted at (01) 615 7650 or BCP.DublinAirport@agriculture.gov.ie

The following are some useful DAFM videos

[Importing animals and animal products after Brexit Nov 2020](#) > [How to create a CHED and how to use TRACES - step-by-step guides Dec2020](#) > [A practical guide to documents and pre-notification you need to import animal products post-Brexit](#) > [What sanitary and phytosanitary \(SPS\) documents you need to import post-Brexit - a practical guide](#) > [Rules of origin](#)

[A complete set of webinars is available here https://www.youtube.com/c/DepartmentofAgricultureFoodandtheMarine/videos](https://www.youtube.com/c/DepartmentofAgricultureFoodandtheMarine/videos)

Q&A with DAFM (provided by DAFM 06.01.2021)

Note: we are awaiting confirmation on an import workshop with DAFM to provide us with further clarification

Products of animal origin

Scenario: An Irish FBO is importing from a third country, the following animal feed products into IE defined in (EC) 767/2009 Article 3 (h) & (J)

1. Premix
2. Compound feed
3. Complementary feed

All contain products of animal origin such as, glucosamine, chondroitin, egg albumin, lactose, whey, gelatine coating on vitamins.

Question 1: Please clarify if (EU)142/2011 derogates compound and complementary feed from the requirements of registering in TRACES, entering through a BCP and carrying a health cert?

Answer provided by DAFM:

No, Regulation (EU) 142/2011 does not derogate compound and complementary feed (containing an animal by-product) imported from a third country from the requirements to register in TRACES, enter through a BCP and be accompanied by the appropriate certificate.

Question 2: Does for example a premix produced using a POA need to enter through a BCP and carry a health cert?

Answer provided by DAFM (Jan 2021): Yes Therefore, if the relevant CN code for the product is listed in Regulation 2019/2007, then it is subject to official controls at the border control post. The specific requirements for import are provided in Chapter I of Annex XIV of 142/2011 with the relevant model certificate set out in Annex XV. Where a compound feed contains more than one type of animal by-product covered by a separate certificate, then a certificate is required for each type of animal by-product. Where no certificate exists for a particular type of animal by-product, import from a third country is not permitted.

Organic Feed

Question 3: What are the extra requirements for importing organic feed from GB / Third Countries.?

Answer provided by DAFM (Jan 2021)

The importer or first consignee must

- a) Register as an organic importer with DAFM at BrexitRegistration@agriculture.gov.ie (see step 2 above)
- b) Be certified as an importer by an Irish Organic Certification Body (OCB)
- c) Register with Traces as the organic feed must come via a BCP (see step 4 above)
- d) Imported products must be accompanied by a Certificate of Inspection (COI) which is signed off by the OCB certifying the relevant operators in GB (third Country).
- e) Prenotification to DAFM (see step 8 above) and notification to your Irish OCB is also required

Question 4: Are UK based Organic Certification Bodies recognised in the EU post Brexit under Regulation 1235/2008 ?

Answer provided by DAFM (Jan 2021)

Yes, the Commission has amended the Regulation with [2196/2020](#) to recognise UK OCBs. The following OCB are listed: Soil Association, Organic Food Federation, Biodynamic Federation, Organic Growers and Farmers Ltd, Organic Farmers and Growers C.I.C and Quality Welsh.

Please contact your relevant organic certification body for further clarification and view the full trader notice [2/2020 Here](#).

Role of a third country representative (provided by DAFM 21.01.2020)

Legislative Basis

- Feed Business Operators wishing to export feed from a Third Country into the European Union must ensure that their feed has been produced in accordance with EU feed legislation.
- Article 3(5) of Regulation (EC) 178 of 2002 defines a feed business as including any undertaking carrying out any operation of production, manufacture, processing, storage, transport or distribution of feed. Furthermore, a feed business operator is defined under Article 3(6) of the same Regulation as the natural or legal persons responsible for ensuring that the requirements of food law are met within the feed business under their control.
- Article 23 of Regulation (EU) 183/2005 sets out the conditions for the importation of feed into the EU from Third Countries whilst Article 33 of the Regulation repeals the previous relevant feed hygiene Directives.
- However, as the provisions of Article 23 have not been completed, Article 24 of Regulation (EU) 183/2005 (*Interim Arrangements*) applies and which sets out a derogation from Article 33 and provides that *'imports shall continue to be authorised under the conditions laid down in Article 6 of Directive 98/51/EC.'*
- Accordingly, Article 6 of Commission Directive 98/51/EC sets out transitional arrangements concerning imports of animal feed from Third Countries, stating *'Member States may only authorise the import from third countries of products [...] from establishments which have a representative established within the Community.'*
- A company wishing to export feed into the EU must have a Third Country representative registered within the EU.

Role

- The primary role of a Third Country Representative is to ensure that establishments located in Third Countries meet, at least, feed production conditions equivalent to those laid down for establishments located in Member States. This equivalency is to ensure that the products deriving from such Third Country feed business operators do not pose risks for human or animal health or the environment.
- In this regard, a Third Country Representative will be required to maintain adequate records that demonstrate that feed being produced and imported from the company they represent, meets **all** EU feed legislation and in particular the feed hygiene requirements set out in Annex I of Regulation 183 of 2005 and the labelling requirements under Regulation 767 of 2009. This will include maintaining details of products being imported, their production, ingredient lists, traceability etc. All labels will only use the official language of the Member State where the product is being placed on the market.
- In addition, the Third Country Representative is required to keep a register of products that the establishments which they represent have put into circulation within the Community.

DAFM Requirements

- It is a requirement of the Department that an application for Third Country Representative status is made on the prescribed form.
- The proposed Third Country Representative entity must be a registered feed business operator based in Ireland. Further information on this process is available here:

<https://www.gov.ie/en/service/8ba4f-approval-and-registration-of-feed-business-operators/>

- A registered and/or approved Third Country Representative operating in the Republic of Ireland must have an active, staffed and physical premises in the State, rather than a simple postal address, and this premises must have full documentation and traceability records including details of the Hazard Analysis and Critical Control Points (HACCP) system of the company represented. This is to ensure that adequate inspection/documentary checks can be carried out to confirm ongoing compliance with EU feed legislation.

- A Third Country Representative will ensure that a product placed on the market in Ireland must have affixed a label that complies with the requirements of Regulation (EU) 767 of 2009 and be in either Irish or English and, for other Member States, the label must be in the official language of the Member State concerned.
- The Third Country Representative will formally declare that the establishment in the Third Country is complying at least with the requirements of EU feed legislation.

If you require further information, please email: Feedenquiries@agriculture.gov.ie