

Webinar - New UK Sanitary and Phytosanitary SPS Import Control Requirements- 6 December 2023

Questions	Answers
IPAFFS	
Will a NI address be sufficient for notifying IPAFFS, up to now a GB address was required?	<p>The questions below would be a matter for the UK authorities.</p> <p>Some contact details below which may be of use.</p> <ul style="list-style-type: none"> - APHA imports telephone: 03000 200 301 - Email: imports@apha.gov.uk <p>Based on current information, as published by DEFRA you must be a registered GB entity to use IPAFFS, this is to ensure there is a GB responsible person for the consignment to follow up with regarding any non-compliances etc. at the BCP. If a business does not have a presence in GB, then a UK based customs agent can be used to complete the pre-notification and other relevant declarations on behalf of the business.</p>
Who is responsible for IPAFFS, the exporter here or the importer in UK?	<p>UK authorities have stated that it must be a registered GB entity which is responsible for making the IPAFFS notification as this means that there is a GB responsible person for the consignment to follow up with regarding any non-compliances etc. at the BCP.</p> <p>If a business does not have a presence in GB, then the Importer based in GB or UK based customs agent can be used to complete the pre-notification and other relevant declarations on behalf of the business.</p>
I attended IPAFFS training and learned that the "place of loading" was required. However, we have 2 manufacturing plants which cannot be noted on IPAFFS as the HS code is the same for both plants. It seems you cannot pre-notify the same HS code on IPAFFS even if there are 2 different places of loading. To note, not groupage load, just 2 collection /loading points.	<p>This question should be raised with the UK.</p> <ul style="list-style-type: none"> -APHA imports telephone: 03000 200 301 -Email: imports@apha.gov.uk
Dairy	
I want to get confirmation if dairy products (e.g., cheese) that are heat treated fall under low risk?	<p>The UK import control requirements varies by risk category. You can check your products risk category via the following: TOM risk</p>

	<p>categories for animal and animal product imports from the EU to Great Britain: summary tables - GOV.UK (www.gov.uk)</p> <p>Based on your question, as the dairy product described is subject to heat treatment your product would fall into the UK low-risk category. You should confirm this with the competent authority team which supervise your food business.</p> <p>As a low-risk product from 31st January 2024 you will need the following:</p> <ul style="list-style-type: none"> - Your UK importer will need to pre-notify the goods on the UKs IPAFFS system. - There is no certification or SPS checks (documentary, ID or physical) required for low-risk Animal & animal products. - Other non SPS checks, such as UK customs checks may apply.
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Fisheries

<p>Are all fishery products subject to EHC or are wild fishery products low risk?</p>	<p>Further clarification is being sought.</p>
<p>We sell oyster to UK customers three times per week, there are approx. 15 consignments to 15 customers per day, do we have to submit a health cert for each consignment?</p>	<p>Yes, one health cert per customer, per consignment will be required.</p>
<p>I understand that the 24-hour advance notification requirement may be reduced to 4 hours for short shelf-life products which I hope fresh fish will come under, is this your understanding?</p> <p>My questions concern the requirement for EHCs for farmed aquaculture products and those scombroid species.</p> <p>As I understand it, I need an EHC for each shipment, but it must be signed by a local vet (French?). We are registered on TRACES and is it possible for Osheamar to set up the EHC as an Exporter from France or do we need a physical presence there?</p>	<p>The UK has stated that IPAFFS pre-notification will be required 24 hours in advance of arrival unless a 4-hour derogation has been pre-agreed with relevant UK Port Health Authority.</p>

General

<p>What are the cert requirements for compound animal feed with ingredients of non-animal origin, also what are custom requirements in relation to documents?</p>	<p>Compound animal feed, which has been manufactured from animal by-products or from derived products and placed on the market packaged and labelled in accordance with Article 4 of Regulation (EC) No 767/2009 does not require a health certificate for export to GB, However, there is a requirement for mill replacers or animal by products that are feed materials to be accompanied by a health certificate.</p> <p>Customs requirements are a matter for Revenue to respond to –</p> <ul style="list-style-type: none"> • General Brexit queries: brexitqueries@revenue.ie • Systems queries to: eCustoms@revenue.ie or 01-7383677 • Customs helpline: 01-738 3685 (Available 24/7)
<p>Any update on derogations for personal consignments or B2C online sales? (In BTOM the UK committed to providing an update in autumn 2023)</p>	<p>We are still waiting for further guidance on this from the UK. In the meantime, you can contact:</p> <p>-APHA imports telephone: 03000 200 301 -Email: imports@apha.gov.uk</p>
<p>Are there differences between EU codes and UK code categories.</p>	<p>The HS code is at six-digit level and is decided at World Customs Organisation level, therefore this would be the same for both the EU and the UK. However, at eight-digit level for exports, and ten-digit level for imports, there can be differences between the EU and UK codes. So, it is important to ensure parties are aware of these potential differences.</p>
<p>I understand there will be sample documentary checks carried out from 31/01/2024. From what date will traditional documentary BCP checks be undertaken on Irish goods?</p>	<p>In terms of regular documentary checks, our understanding is they will start when entry to border control posts become a requirement.</p> <p>However, the UK have indicated that they will be performing educational documentary checks, these checks will consist of direct feedback to the trader & collated anonymised feedback which will be made available to all traders. There will be no routine holds unless the goods pose a risk.</p> <p>UK Authorities have not confirmed yet when Border Control Post entry checks for SPS will apply for goods imported from Ireland. They have indicated that this will not commence before 31 October 2024.</p>
<p>Does the physical hard copy of the Health Cert have to travel with the load from ROI to GB?</p>	<p>UK authorities have stated that they will accept Export Health Certificates generated electronically in TRACES for EU product imports. These Health Certificates can be eSigned & eSealed and downloaded from TRACES for uploading by the GB importer to IPAFFS.</p>

	<p>The use of the original downloaded eSigned & eSealed EHCs uploaded to IPAFFS will remove requirement for the physical signed certificate to travel with the consignment.</p> <p>Plant & Plant products will also be issued electronically. The ePhyto system will be used for these products.</p>
<p>There was previously a requirement for product to be sent on ISPM 15 heat treated pallets, is this still a requirement?</p>	<p>Any pallets moving to UK on wood packaging must be ISPM 15 certified, this includes crates or dunnage.</p>
<p>Soda bread and Gluten free bread will count as a low-risk product?</p>	<p>The UK import control requirements varies by risk category. You can check your products risk category via the following: TOM risk categories for animal and animal product imports from the EU to Great Britain: summary tables - GOV.UK (www.gov.uk)</p> <p>Based on the information provided, it looks like this product would fall under the low-risk category. You should confirm this with the competent authority team which supervises your food business.</p>
<p>Do you have contact details for the DAFM competent authority team/supervisory teams?</p>	<p>Please send an email to Brexitcall@agriculture.gov.ie with details of your company, name, location etc. and we can verify who your competent authority is.</p>
<p>Hi, can you confirm if a CHED P /generated through TRACES NT is required for LOW-risk goods?</p>	<p>TRACES is an EU system, that will be used in the application for the issuance of Export Health certificates for exports to GB. The requirement for a Health certificates / the types of health certificates will be determined by your product type & its UK risk categorisation. See below further detail, on UK low risk category products which will not require an export health certificate so consignment details will not be required on TRACES.</p> <p>However, if you are exporting low risk category animal products to GB, each export consignment will need to pre-notified on UK IPAFFS system by GB importer. The exporting food business must be registered on EU TRACES system as an approved exporter as UK IPAFFS system will use TRACES listings to allow notification to be made.</p> <p>The UK import control requirements varies by risk category. You can check your products risk category via the following: TOM risk categories for animal and animal product imports from the EU to Great Britain: summary tables - GOV.UK (www.gov.uk)</p> <p>Animal & Animal products</p>

	<ol style="list-style-type: none"> 1. An export Health certificate will be required for High & Medium risk Animal & Animal Products. You will need to contact your supervising competent authority to see what you will need to do in order to apply for a Health Certificate. In the case of DAFM supervised plants you will need to apply on Traces. 2. Low risk Animal & Animal Products will not need a Health Certification. 3. All risk categories (Low, Medium, High) of Animal & Animal products will need to pre-notify their import on IPAFFS. This will need to be done by the UK based importer. <p>Plant and Plant Products</p> <ol style="list-style-type: none"> 1. There will be no requirement for the pre notification of low-risk plant & plant products. 2. There will also be no requirement for a phytosanitary certificate. <p>While there will be no Documentary, ID or physical checks on Low-risk Plant and Plant products, there may be some intelligence led/ surveillance checks on these products.</p>
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Groupage

<p>How is groupage going to be dealt with when health certs come in?</p>	<p>There will be different scenarios depending on each consignment. Groupage will be dealt with on a case-by-case basis, whereby certification may be provided at food business of origin of products (Linear model) or in a consolidation hub premises if products from multiple sources are being mixed to make up consignments to GB. You should clarify with you at actors in your GB supply chain to confirm where certification will take place and also discuss with the competent authority supervising your food business.</p>
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Labelling

<p>With regard to new labelling, and the requirement for FBO address, what if you have old packaging? Can you still use this up? Will there be a period of "grace " to use this up?</p>	<p>This is a new UK requirement from 1 January so should contact UK authorities for details on any grace period available: - APHA imports telephone: 03000 200 301 Email: imports@apha.gov.uk</p>
<p>If you are sending product to GB, do you have to put the importer address on the label if it is being sent to a food business for further processing and it is not going for direct sale?</p>	<p>From 1 January 2024, pre-packaged food or caseins sold in GB must:</p> <ul style="list-style-type: none"> - include a label with a UK address for the Food Business Operator (FBO) whose name the food is marketed under, <li style="text-align: center;"><i>Or</i> - If the FBO is not based in the UK, the address of the importer in the UK.

	<p>- Products sold in NI must have either a NI address or an EU address on its label.</p> <p>The UK have stated that this address needs to be a physical address, The company address cannot be a PO box, email address or phone number.</p> <p>For more information on the this new UK labelling address requirement please see DEFRA Food labelling guidance & the UK Border Target Operating Model</p>
<p>Will the Country of Origin labelling/declaration of origin of primary ingredient reported as EU/non-EU be changed into UK/non-UK, as reported in the retained EU legislation 775/2018 from 2024 for EU products imported into the UK?</p>	<p>From 1 January 2024 UK authorities will apply some new food labelling requirements in respect of:</p> <ul style="list-style-type: none"> a) Requirement for UK Importer address to be applied on pre-packaged food or caseins and b) Requirements related to Country-of-Origin Labelling. <p>Specific country of origin labelling requirements by product are also changing from <u>1 January 2024</u>. UK Government Guidance on these changes is available in links below:</p> <ul style="list-style-type: none"> - Food labelling: country of origin - Food labelling and packaging <p>For further advice on these changes to UK labelling requirements, you should contact your GB trading standards office.</p> <p>If you are exporting food products to GB, you should contact your customers and importer in GB to confirm if any changes apply for your business</p>
<p>As NI is a special case can NI cattle processed in ROI be classed as EU beef? Will it be Origin UK, or it can be stated as born raised in EU?</p>	<p>There is no such regulatory descriptor as “EU Beef”.</p> <p>The beef labelling regulations (Regulation 1760/2000) require the label to contain the following:</p> <ul style="list-style-type: none"> • Batch Number • Slaughtered in...(name of country) • Cutting in(name of Country) • Country of birth, and all countries where rearing took place; if both birth and rearing took place in the country of slaughter, this may be indicated as follows: ‘Origin: [name of country]’; <p>NI born and reared cattle that are slaughtered in Ireland can be described as “EU beef” as a <u>voluntary</u> claim if it can be verified that they were actually born and reared in NI.</p>

Revenue

<p>Information for the GVMS system is generally entered by hauliers? What information do they need to complete information for GVMS system?</p>	<p>Full details will need to be confirmed with HMRC. From our engagement with them, they have advised the MRN of the UK import/transit declarations will be required in the GVMS.</p>
<p>For customs, would we need information from our dairy supplier if we are sending products with fresh cream?</p>	<p>Full details on the data required in the import declaration will need to be confirmed with HMRC. The UK Government operates an online forum where you can access key information and ask questions directly on: Importing and exporting - Community Forum - GOV.UK (hmrc.gov.uk)</p>
<p>Following on from my question above IPAFFS (2 loading places question) I did contact APHA & was advised to complete 2 pre notifications to advise of both loading places. However, this will render 2 CHED P references which will be required on the CDS import declaration. Would Ray know if CDS will take N853 CHED P twice?</p>	<p>This will need to be confirmed with HMRC – Import/export general enquiries Imports and exports: general enquiries - GOV.UK (www.gov.uk) or by calling 0300 200 3700</p>
<p>How much notice do we have to give UK customs for a shipment. Is there a 4-hr option. We have a low-risk product and wouldn't have cold store capacity for holding stock 24hrs.</p>	<p>The customs import declaration needs to be done in advance of departure from Ireland. It needs to be completed through the GVMS system. If the shipment requires IPAFFS pre-notification, you will need to complete this first before the customs declaration. The reason being that you will need the IPAFFS reference number to complete declaration.</p>

Northern Ireland

<p>Any update on the publication of the additional guidance on QNIG and unfettered access to GB. Where QNIG are moved to GB via ROI port, what if anything is required at the Irish port? How do you evidence that QNIG? Any GB port of entry requirements?</p>	<p>Since January 2021 all goods moving from an Irish Port into GB require customs formalities to be completed. The Revenue requirements are not changing so NI-IE-GB movements will follow the same customs requirements from a Revenue perspective.</p> <p>In majority of cases a transit declaration is used from when moving goods from NI to GB, through an Irish Port. The transit declaration MRN is used to allow the Pre-Boarding Notification to be completed and presented to ferry operators in advance of boarding.</p> <p>In relation to the GB requirements, from the detail provided in the Border Target Operating Model (BTOM), there is a GVMS requirement for QNIG (see page 70). HMRC have advised that from 31 January 2024 vehicles will not be allowed board a ferry for GB without a GVMS completed for all the goods on board. I would encourage you to thoroughly read through the BTOM document, any questions or clarifications on the detail would need to be</p>
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	<p>confirmed with HMRC. It is this aspect of the journey that will change from 31 Jan 2024.</p> <p>Revenue has some further detail at this page: https://www.revenue.ie/en/customs/businesses/brexit/declaration-roles-responsibilities/exporter/uk-import-controls-dates.aspx and also a summary document in further guidance area of that page</p>
<p>QNIG - Qualifying NI Goods. DEFRA have said that QNIG will not require a health cert - either full or transit versions, even if the goods are exporting via an IE port. The one thing that they are saying that differs from what I have seen from DAFM is that, if an NI business dispatches a pallet from NI, and it stops for consolidation in IE, this pallet would lose its QNIG status and would require a Health Cert. Will DAFM vets be able stamp cert in this instance and what information would DAFM require to do this?</p>	<p>DAFM's understanding is that NI Qualifying Goods will not need Health certs, even if departing via Irish Ports.</p> <p>We have no information from UK authorities suggesting that any NIQG exiting via Irish Ports will require export health certification.</p>
<p>In in relation to my question re QNIG - is a transit document required?</p>	<p>Yes, a transit declaration would be required and the MRN would need to be submitted to Revenue's Pre-Boarding notification as well as the UK's GVMS system.</p>
<p>If an animal was born, raised, and killed in NI and sent for further processing / boning to ROI and is then exported to UK as raw meat box product, will this require HC and all documentation same as ROI origin animals?</p>	<p>Yes, it will export health certification if exported to GB, if processing takes place in Ireland the origin of animal will need to be stated on the labelling.</p>