Update on the UK's new import control requirements - Webinar 18th April 2024

WCDIIIdi 10 April 2024	
Questions	Answers
Transit	
What about transit via Killingholme. Is there going to be a BCP there?	You'll find a list of UK BCPs here - BCP Locations and Map - UK Plant Health Information Portal (defra.gov.uk) Killingholme is on the list.
For applying commercial seals on transits - how will this be applied for groupage?	A commercial seal can be applied to container which includes a number of consignments, however that seal number would need to be included on each IPAFFS notification for each consignment on the container. If you require further information on this you should raise to with UK authorities, in terms of how it will work on IPAFFS and at UK Border Control Posts. Contact details as follows: Telephone: 03000 200 301 email: imports@apha.gov.uk authorities
This is part of the statement issued by the SFPA: For the sake of clarity, this now means that transits of fish, fishery products and molluscan shellfish for human consumption whether they are low or medium risk, do not require transit certification, just IPAFFS prenotification, commercial documentation and confirmation that the consignment has left GB. Will this still apply after 30.04.2024?	Yes, there is no change to the guidance from Jan 31st. The April changes do not impact this. The key element of this statement relates to products 'for human consumption'.
Will the consistency between CHED import notifications and customs declarations as described in BBTP Trader engagement apply to Transits from France to Ireland?	DAFM understanding is that the crosschecking between IPAFFS and UK customs systems will also apply to transit movements.

For Landbridge UK goods entering at Dover / Eurotunnel and exiting Holyhead for a final destination to Dublin - we are being advised that in addition to the CUC charge there is also a minimum APH charge of GBP 109 - is this correct?

You should contact DEFRA/APHA on this matter - APHA - GOV.UK (www.gov.uk) including GVMS – tel. 0300 322 9434

The Common User Charge (CUC) for Sevington BCP, which services Port of Dover and Eurotunnel, applies to all animal products transit consignments moving via these UK exit points. Inspection fees for Sevington BCP will be set by the Port Health Authority running this facility.

Charges in relation to BCPs in other UK privately run ports, will be set by the local Port Health Authority for each specific BCP including any standard charge applicable to all SPS consignments and specific inspection charges for consignments subject to inspection controls at those BCPs.

Any additional fees and charges applicable to inspections carried out can be found on APHA - GOV.UK (www.gov.uk)

Plant And Plant Products

Will these changes impact the flow of hemp-based products (oils, dried plant based powdered biomass containing non controlled parts) from Ireland to the UK?

In terms of requirements for import controls, the UK has information at CN code level, based on the risk category the goods fall under. There are different requirements for each risk category. You should use the CN code for these hemp products to check which UK risk category applies see below links to UK CN code risk category checkers.

Import risk categories for animals and animal products imported from the EU to Great Britain, from 31 January 2024- GOV.UK (www.gov.uk)

TOM risk categorisations - UK Plant Health Information Portal (defra.gov.uk)

Health Certs

Will there be a health cert required for export from Ireland to Belgium through GB?

If the product is classified by UK as a medium or high risk animal product it will require a UK transit health certificate if moving via GB landbridge.

See below links to UK CN code risk category checkers.

Import risk categories for animals and animal products
imported from the EU to Great Britain, from 31 January
2024- GOV.UK (www.gov.uk)

TOM risk categorisations - UK Plant Health Information Portal (defra.gov.uk)

We have had occasions when drums of sauce have been rejected for faulty packaging. In this instance would the Irish importer be responsible for health certification when the cargo is being returned to sender? The details of UK detention and return policy is a matter for UK authorities it is recommended that you contact DEFRA, to seek clarity on UK returns policy. defra.helpline@defra.gov.uk

Landbridge

To reconfirm - if goods are moving Landbridge via the UK, entering Dover and exiting Holyhead - we do not have to email the relevant BCP to confirm load has exited the UK.

Yes, DAFM's understanding based on latest UK guidance available is that transits exiting via West Coast UK Ports including Holyhead do not need to notify or confirm exit via email.

Common User Charge (CUC)

The UK government is suggesting it will provide support to their SMEs for the CUC. Will there be supports put in place for Irish companies to cope with the CUC imposed by the UK government for transiting goods?

DAFM is not aware of any direct UK Government financial supports to traders in respect of Common User Charges. DAFM will continue to monitor impacts of new UK control requirements on Irish traders as they are introduced.

Also - the payment of the CUC - our company has been advised it must have a GB Vat Number - will a GB EORI number be sufficient?

This is a matter that should be raised directly with UK authorities –

Import/export general enquiries <u>Imports and exports:</u> <u>general enquiries - GOV.UK (www.gov.uk)</u> or by calling HMRC 0300 322 9434.

Groupage

We use groupage as our means of transport for medium risk food product via the UK to Europe. When we are completing our Traces Cert, the registration number of the truck on which our goods will be exported is not available. Will this cause an issue when the checks are fully in place at the port? See below latest UK guidance on Groupage can be accessed on link <u>here</u>. See below extract which addressed transport information issue on health certificates.

'Exporting to Great Britain without full transport information

If you are exporting animal products from the EU or EFTA as part of a groupage or mixed load, you may not know the final means of transport information or vehicle identification to complete the health certificate. Therefore, the certifying officer may complete the means of transport in the relevant box and use the word "groupage" as the identification instead

However, the final transport details should be provided correctly as part of the Import of Products, Animals, Food and Feed System (IPAFFS) import declaration before arrival of the consignment in Great Britain.

If the health certificate requires inspection of the means of transport, the certifying officer must add the transport details to the health certificate and cannot use the word "groupage" as identification.'

ABP

We are classified by the UK government as a low-risk product of animal origin (dry pet food). We are looking to send parcels of this product to the UK via a courier

Latest UK Government Guidance states that trade samples are treated the same way as commercial movements of SPSP. If a product falls into the medium risk category the full range of controls requirement apply.

to our customers. These samples being sent are trade samples which are not for the retail market. What are the entry requirements around these samples? We were previously told that the UK classify trade samples as medium risk. However, our product (dry pet food) is classified as low risk.

If you are sending a low-risk product and have confirmed with the UK that it is low-risk, you will not need a health certificate but you would need to complete an IPAFFS prenotification.

DEFRA contact details may be helpful if you require further information -

Telephone: 03000 200 301

email: imports@apha.gov.uk authorities.

Direct To Customer

We use UPS, will they be responsible for making the declaration on the GVMS? We're a low-risk product of animal origin.

UK authorities have not released guidance on Business to consumer parcel consignments.

You should contact DEFRA for further information - Telephone: 03000 200 301

email: <u>imports@apha.gov.uk</u> authorities.

Revenue

We've noticed anything we send to the UK that's liable to VAT is getting pulled by HMRC border force. This is despite us having a deferred UK VAT account. We are a low-risk composite product and import using DDP terms. Has anyone else had experience of this? It seems to have happened since end of March. We are having to pre-lodge cash with our haulier to import goods now.

We've raised this matter with colleagues in Revenue Commissioners who have indicated that they are not aware of other traders experiencing this issue.

You may wish to contact HMRC – tel. 0300 322 9434 or the DEFRA helpline – tel. 03459 33 55 77 or defra.helpline@defra.co.uk for advice on what exactly the reasons are for your consignments being routed for a check.