



AUSSENWIRTSCHAFT AUSTRIA

Export of food and agricultural products post-Brexit

AußenwirtschaftsCenter London E london@wko.at T +44 20 7584 4411

OUR EXPERTS AND TIMETABLE



Quick facts and trade patterns post-Brexit



Current legal situation, risk categorisation and certification



An importer's perspective post-Brexit and practical approach to BTOM

Michael Müller AC London

E london@wko.at

Andreas Wunsch

Austrian Federal Ministry for Social Affairs, Health, Care and Consumer Protection

E andreas.wunsch@ gesundheitsministerium.gv.at

Tom Campbell-Smart
Brand Organic

E tom@brandorganic.co.uk



The UK Food & Beverage Sector

- F&B industry is the UK's biggest manufacturing sector by turnover (EUR 129 bn)
- Food accounts for 11 % annual household budgets (20 % when including out-of-home consumption)
- Only 54 % of food consumed originates in the UK
- UK relies heavily on imports, 30 % come from the EU
- Number of FDI projects in F&B industry has decreased from an average of 150 projects per year 2016-2017 to 100 projects per year 2022-23
- Cost of Living Crisis: dining out suffers, high demand for premium categories in retail
- Special dietary demands on the rise (7.5 mn people are vegetarian or vegan in the UK)
- Alcoholic beverages: steady growth of alcohol-free versions/low alcohol beverages



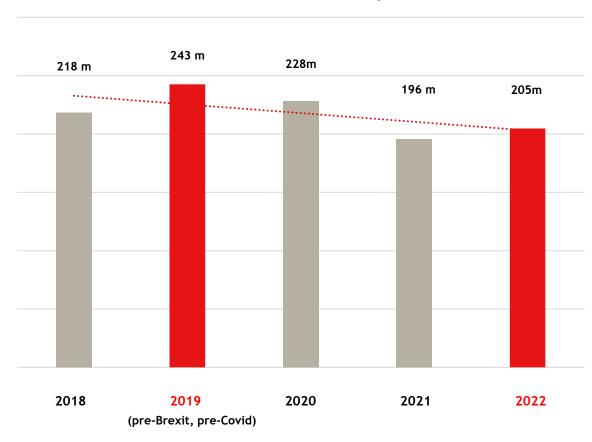
Trade Patterns Post-Brexit

- Overall F&B imports to the UK have fallen by 1 % since Brexit (2019: 63.6 bn | 2022: 63 bn)
 - In contrast overall exports have risen by 14,9 % (2019: EUR 423 bn | 2022: EUR 486 bn)
 - Imports from the EU -4.4 % (2019: 46.1 bn | 2022: 44.1 bn)
 - Imports from non-EU +7.4 % (2019: 17.5 bn | 2022: 18.9 bn)
- Animal feed imports to the UK have risen +5.5 % (2019: 3.6 bn | 2022: 3.8 bn)
 - Imports from the EU +8,6 % (2019: 2.1 bn | 2022: 2.3 bn)
- The UK is the EU's largest export destination for agricultural goods and f&b and the 2nd largest origin of EU imports (Brazil ranks 1st)
- New UK trade deals (e.g. Australia, New Zealand) have not yet shown any impact on trade patterns.
- Some EU exporters have reorganized supply chains.
- Latest results: 2022 UK food, feed and beverage international trade:
 - Exports 2022: EUR 28.7 billion (+13 % compared to 2021) | main destinations: Ireland, France, USA, Netherlands
 - EU 15.9 bn (+11.5 % compared to 2021)
 - Imports 2022: EUR 66.8 billion (+5,4 % compared to 2021) | main sources: Netherlands, France, Ireland, Belgium
 - EU 46.4 bn (+8.3 % compared to 2021)
 - Highest UK export value: whisky, totaling EUR 7.4 bn
 - Highest UK value category for imports: Fresh fruit & vegetables, EUR 7.6 bn

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AUSTRIA-UK FOOD, FEED AND DRINK EXPORTS

Austrian food, feed & drink exports to the UK



Comparing 2019 (pre-Brexit, pre-Covid) to 2022:

Biggest gains

- ✓ Preparations for animal feed EUR 33.3 m -> 39.4 m | +6.1 m
- ✓ Cheese and curd cheese EUR 10.2 m -> 14.3 m | +4.1 m
- \checkmark Corn: EUR 2.4 m -> 3.7 m | +1.3 m
- √ Chocolate: EUR 8.7 m -> 9.8 m | +1.1 m

Biggest declines

- Mineral water EUR 53.7 m -> EUR 29.9 m | -23.8 m
- Meat and preparations of meat EUR 26.7 m -> EUR 11.8 m | -14.9 m
- Preparations of cereals, flour, starch, milk and bakery products
 EUR 51.7 m -> 45.9 m | -5.8 m
- Edible fruit, citrus fruit peel, melons EUR 7 m -> 3.7 m | -3.3 m

Post-Brexit: Frequent changes of course with new regulations

- Brexit made "the life of an exporter" more difficult
 - Movement of goods more complex and requires thorough preparation
- "Border Target Operating Model" BTOM affected by "politics of Brexit"
 - Multiple postponements of customs controls for EU goods
- On 29 August 2023, the British government announced new deadlines for the introduction of TOM:
 - 31.01.2024: Veterinary certificates and phytosanitary certificates mandatory for high and medium risk products
 - 30.04.2024: Introduction of controls for animal products and plant products with a medium risk at border control posts (BCP)
 - 31.10.2024: Introduction of safety and security declarations for all EU imports
- What's new and what has changed our experts will give you an overview





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WKO-WEBINAR

UK – BTOM upcoming SPS controls in live animals and POAO

23. November 2023 ONLINE



CONTENT

- 1. Introduction
- 2. STATUS QUO
 - a. What needs/needed to be considered so far?
 - b. What's new BTOM?
- 3. TOM milestones and deadlines
- 4. Risk categories
- **5. Export Health Certificates (EHC)**
- 6. Summary

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The entry into force of provisions and deadlines for the **EXPORT of foodstuffs** to the UK per <u>01.01.2021</u>:

- *step by step implementation (last amended 28 August 2023!)
 - **1.** <u>since</u> **1** January 2021: "high risk SPS products" → EHC (+UNN), prenotification and documentary checks at the BCP + registration of the establishment in TRACES!
 - 2. since 1 January* 2022: PRE NOTIFICATION (via IPAFFS) for all products of animal origin (POAO) as well as for animal by products (ABP)
 - 3. from (expected?) 31st of January 2024:
 - a) new "Border Target Operating Model" (TOM) for imports including "Single Trade Window" (= a single gateway for application and management of Trusted Trader status)
 - b) risk categorisation (Low/Medium/High)
 - Accredited Trusted Traders (Accredited Trusted Trader Scheme ATTS)

UNITED KINGDOM (UK) - BTOM

The entry into force of provisions and deadlines for the EXPORT of foodstuffs to the UK per <u>01.01.2024</u>:

*step by step implementation (last amended 28 August 2023!)

a) Timeline of TOM milestones

- From 31 January 2024: Export health certificates (EHC) and phytosanitary certificates are introduced for medium risk animal products (POAO incl. ABP) and plants and plant products imported to GB from the EU.
- ▶ from 30 April 2024: Documentary and risk-based physical and identity checks at the border (BCP's) are introduced for medium risk animal products, plants and plant products imported to GB from the EU.
- from 31 October 2024: Safety and Security declarations are required for EU imports. Alongside this, use of the UK Single Trade Window will remove duplication across pre-arrival datasets where possible.
- ➤ from 31 October 2024: Documentary and risk-based physical and identity checks on medium risk animal products, plants and plant products will be introduced at ports on the West Coast of Great Britain

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- b) TOM Risk categorisation for animals and POAO Low/Medium/High
 - ➤ **LOW risk:** Provision of a <u>pre-notification</u> data set (via IPAFFS) and commercial documentation (importer) will be required, there would be <u>no</u> requirement for <u>health certification</u> or routine physical border checks. (= shelf stable > <u>Examples:</u> UHT milk, composite products, insect protein/feed)



- ► MEDIUM risk: Imports will require <u>pre-notification</u> (via IPAFFS) and <u>EHC</u> and be subjected to documentary checks and risk-based identity and physical checks at the BCP. (<u>Examples:</u> Meat and meat products, chilled raw milk products, eggs and egg products, some ABPs/pet food)
- ➤ HIGH risk: Imports will require <u>pre-notification</u> (via IPAFFS), <u>EHC</u>, documentary checks and a <u>higher degree of physical and identity checks at the BCP</u> with some exceptions, live animals will be subject to 100% identity and physical checks (*Examples: live animals and germinal products, goods under safeguard measures*)

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b) TOM RISK CATEGORISATION for animals and POAO Low/Medium/High

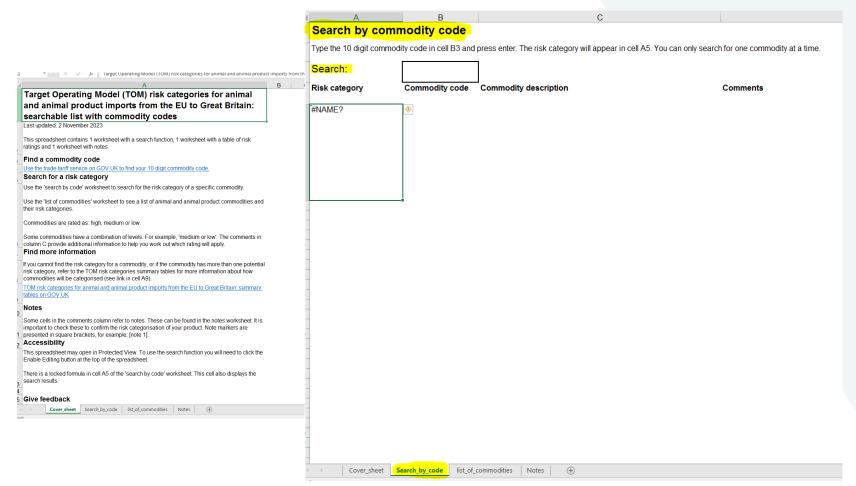
- > "no further changes" regarding risk categories until April 2024> specification for certain goods (composites?)
- > categories in a table format incl. a **look-up tool** designed to help Traders searching & finding the BTOM risk category by CN code.
- Check import risk categories and related rules for animals and animal products imported from the EU to Great Britain, from 31 January 2024 GOV.UK (www.gov.uk)



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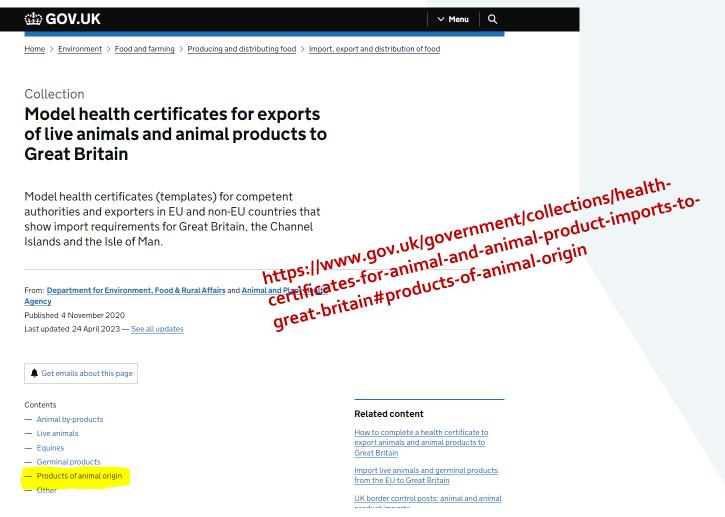
b) TOM Risk categorisation for animals and POAO

Low/Medium/High



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EXPORT HEALTH CERTIFICATES - EXAMPLES



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EXPORT HEALTH CERTIFICATES - EXAMPLES

Products of animal origin Bovine meat: model health certificates 31 October 2023 Form Composites: model health certificates 31 August 2023 Form Dairy and milk: model health certificates 31 August 2023 Form Eggs: model health certificates 31 August 2023 Form Fish products: model health certificates 31 August 2023 Form Gelatine and collagen intended for human consumption: model health 31 August 2023 Form Meat products: model health certificates 31 October 2023 Form Ovine meat: model health certificates 31 August 2023 Form Other animal products: model health certificates 31 August 2023 Form

GBHC127E/SM MP-PROD: Meat products from the EU under safeguard measures PDF, 198 KB, 11 pages This file may not be suitable for users of assistive technology. Request an accessible format. GBHC352 MP-PROD: Meat products PDF, 230 KB, 13 pages This file may not be suitable for users of assistive technology. Request an accessible format. GBHC128X MP-PROD-T/S: Meat products transit or storage from non-EU countries PDF, 124 KB, 4 pages This file may not be suitable for users of assistive technology. Certificates GBHC127X, GBHC352 and GBHC127E/SM Non-EU countries must use certificate GBHC127X from 1 January 2021. Non-EU countries must use certificate GBHC352 from 30 April 2024... EU countries must use certificate GBHC352 from 31 January 2024. EU regions subject to safeguard measures must use GBHC127E/SM from 1 January 2021.

Model health certificate for certain meat products and treated stomachs,

bladders and intestines (Decision 2007/777) (MP-PROD).

Request an accessible format.

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EXPORT HEALTH CERTIFICATES - EXAMPLES

Model health certificate for certain meat products and treated stomachs, bladders and intestines (MP-PROD)

GBHC352 v1.2 Oct-23 I.2 Certificate reference no. I.3 Central competent aut Address: I.2.a Not in use I.4 Local competent author I.5 Consignee I.6 Not in use Name: Address: I.7 Country of .8 Region of Code I.9 Country of ISO origin origin destination code I.11 Place of origin I.12 Not in use Name: Approval number Address I.13 Place of loading I.14 Date of departure Approval number Address I.15 Means of transport I.16 Entry BCP Aeroplane Ship Railway wagon Road vehicle I.17 Not in use Other Identification: Documentation references:

Meat products for human consumption (MP-PROD) GBHC352

II.a. Certificate reference no. II.b.

(*)(e) the intestines were sourced from a country or region with negligible BSE risk, and are derived from animals that were born, continuously reared and slaughtered in a country with negligible BSE risk and that passed ante and post-mortem inspections, and
(*)(I)(I) If the intestines were sourced from a country where there have

(i) the intestines were sourced into a country where there have been BSE indigenous cases, the animals were born after the date from which the ban on the feeding of ruminants with meatand-bone meal and greaves derived from ruminants has been enforced:

OR (*I(ii) if the intestines were sourced from a country where there have been BSE indigenous cases, the meat products do not contain and are not derived from specified risk material in accordance with GB regulations;]]

(*)[if the product contains material from domestic solipeds, the following must be met:

(*)EITHER [the meat was obtained from domestic solipeds slaughtered in a third country in compliance with GB regulations regarding:

- · period of residence in the third country before slaughter;
- · administration of certain substances; and
- monitoring of certain residues and substances;]

(*) AND/OR [the meat of domestic solipeds used in the products was imported from Great Britain;]]

(*)[PH/D103 Trichinella requirements

the meat products have been obtained from meat from domestic porcine animals which:

(*) EITHER [has been subjected to examination by a digestion method with negative results]

(*)AND/OR [has been subject to a freezing treatment];

(*)AND/OR [is derived from domestic porcine animals either coming from a holding officially recognised as applying controlled housing conditions in accordance with GB regulations or not weaned and less than 5 weeks old!

(*)[PH/D104 Trichinella requirements

the meat products have been obtained from horse meat or wild boar meat which meets the GB regulations in regards trichinella controls;]

(*) Keep as appropriate.

Official Veterinarian

By signing this certificate, I certify that the requirements laid out above and in the accompanying notes for completion have been met.

Name (in capital letters):

Date:

Signature:

Stamp:

Meat products for human consumption (MP-PROD) GBHC352

art III. Notes for completion

These notes for completion must be read and understood by the certifying officer before signing the certificate. Notes are set out in sections that correspond to the sections in the certificate. By signing this certificate, certifiers are verifying that the consignment meets the requirements set out in the certificate and any relevant corresponding notes for completion.

These notes do not need to be printed as part of a paper certificate that accompanies the consignment or in any electronic copy of the certificate.

References to European Union legislation within this certificate are references to direct EU legislation which has been retained in Great Britain (retained EU law as defined in the European Union (Withdrawat) Act 2018) and can be viewed on the UK legislation website (legislation.gov.uk).

References to GB requirements refer to the requirement(s) of Great Britain as set out in the accompanying

References to Great Britain in this certificate include Channel Islands and Isle of Man.

Part I

Box reference I.8:	Region (if appropriate) referred to in a document relating to 'meat products' a published on gov.uk, in accordance with Decision 2007/777/EC. (1)
Box reference I.11:	Place of origin: name and address of the dispatch establishment.
Box reference I.15:	Registration number (railway wagons or container and road vehicle), flight number (aircraft) or name (ship). Separate information is to be provided in the event of unloading and reloading.
Box reference I.19:	Use the appropriate Harmonised System (HS) code under the following headings: 02.10, 16.01, 16.02 and 05.04.
Box reference I.23:	Identification of container/Seal number: only where applicable.
Box reference I.28:	Species: select among species described in AH/P301(A);
	Nature of commodity: choose among the following: meat product, treated stomachs, bladders and intestines;
	Abattoir: approval number of any abattoir or game-handling establishment;
	Cold store: any storage facility;
	Manufacturing plant, approval number

Part II

Animal Health

AH/P100 Product requirements

Treatment is specified in in a document relating to 'meat products' published on GOV.UK, in accordance with Decision 2007/777/EC. $^{(t)}$

AH/P301 Product requirements

Meat products must be as laid down in point 7.1 of Annex 1 to Regulation (EC) No 853/2004 and treated stomachs, bladders and intestines that have undergone one of the treatments referred to in a document relating to "meat products", and "products" and "fresh meat of ungulates" for EU countries and EFTA states in accordance with Decision 2007/777/EC.(1)

or completion of the table:

(A) Insert the code for the relevant species of meat product, treated stomachs, bladders and intestines where:

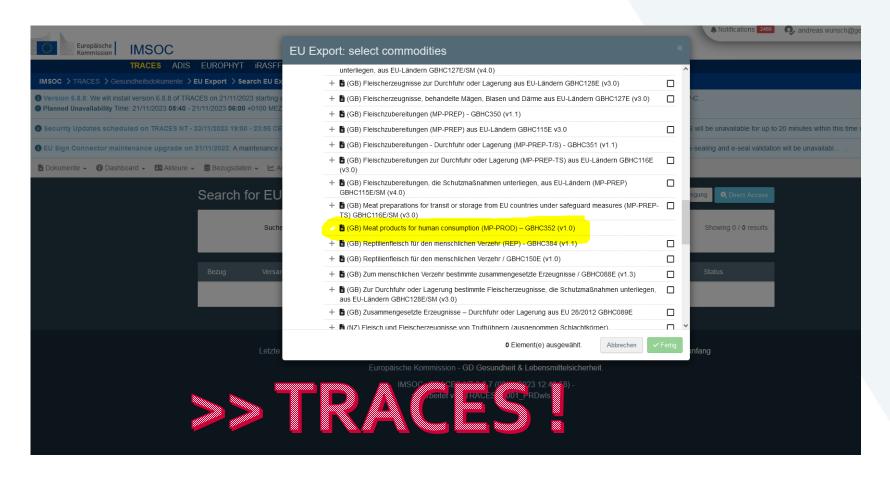
. BOV = domestic bovine animals (Bos Taurus, Bison, Bubalus bubalis and their crossbreds)

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EXPORT HEALTH CERTIFICATES - EXAMPLES



UK – BTOM: SUMMARY - TRENDS - NOTICES - LINKS

(as of August 2023)

> UNTIL 30 January 2024 (?):

- Requirements as stated above will remain valid (Export clearance and EHC ONLY FOR HIGH RISK consignments, TRACES registration and pre notification via IPAFFS), where necessary electronically signed certificates via TRACES or PDF > Importer (to be on the safe side use always a scanned PDF document!)
- no further SPS requirements and
- no further health certificates, consequently ...
- no official veterinary export clearance for exports to the UK (except high risk goods!)
- all establishments: mandatory registration in TRACES NT!
- >> **KVG** informations (<u>VK Großbritannien KVG</u>) are regularly updated!



UK – BTOM: SUMMARY - TRENDS - NOTICES - LINKS

(as of August 2023)

- > FROM 31st January 2024 (?):
 - BTOM >> see above and get prepared!
 - all establishments: mandatory registration in TRACES NT!
 - >> KVG informations (VK Großbritannien KVG) are regularly updated!



THANKS for your attention!



https://www.verbrauchergesundheit.gv.at/handel_export/bvzert/Europa/26022021.html





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An importer's perspective post-Brexit and practical approach to BTOM

Tom Campbell-Smart Brand Organic



brand organic

- > Import agency founded in 2018.
- > Represent 19 brands in the UK market (15 EU).
- > Specialise in importation of branded natural & organic food & drink products.
- > Customers include 15+ wholesalers, Planet Organic, Abel&Cole, Whole Foods Market, WH Smith, Coop and more.
- > Shortlisted for Business of the Year at the International Trade Awards 2023.



Tom Campbell-Smart

- > Operations Director, joined company in 2019.
- > Overseen rapid growth in import calendar as a result of post-Brexit regulatory changes.
- > Strong advocate of organic and the benefit of international trade.

UK Market Overview



1

High Inflation is affecting shopper behaviour.

Food prices have risen 12.2% in last 12 months.

2

Economy not in growth; recession expected.

High interest rates to curb inflation.

3

Brexit has posed logistical challenges and supply chains have been stretched.

Likely this will continue.

4

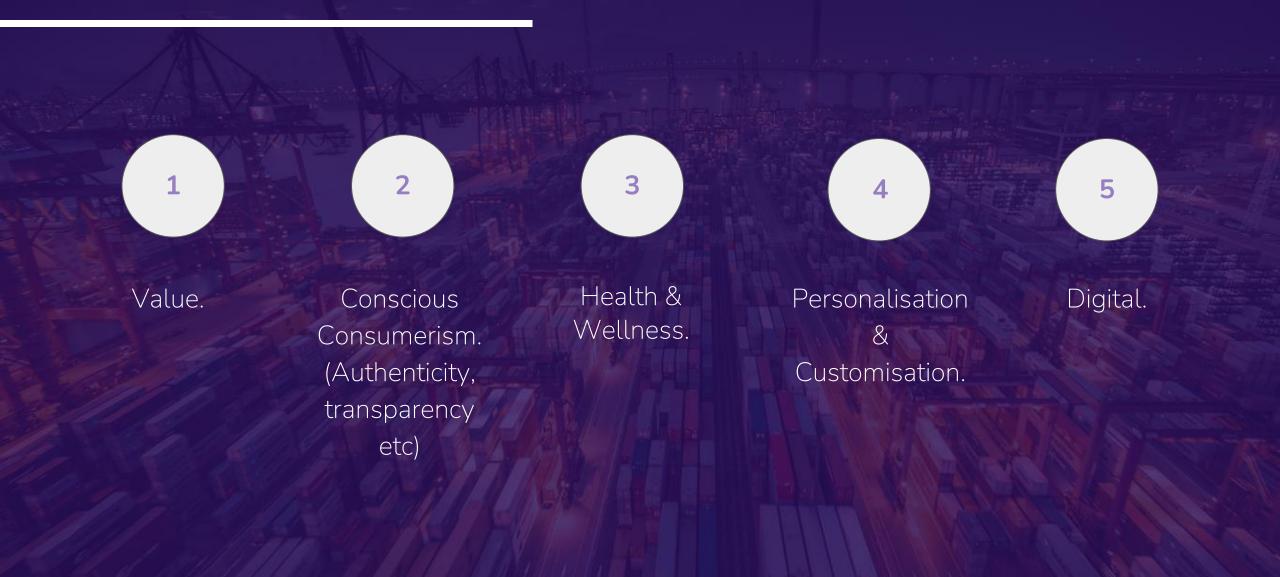
Consumers increasingly shopping for 'Value'.

Discounters have seized considerable market share. 5

Advanced D2C market; growth has slowed since pandemic but still central to many younger consumers in particular

Top Consumer Trends





The Role of an Importer post-Brexit



- > All goods must now be imported.
- > Importer takes full legal responsibility for goods.
- > Liability cannot be passed back to the EU.
- > Importer must be a UK company, with a recognised EORI number, VAT number etc.
- > If importing organic, the importer must hold an organic licence.
- > If importing food & drink, they should be a registered food business.
- > As of 2024, the name and address of this importer must appear on the label if the goods are retail-ready.
- > There are additional costs involved in the supply chain as a result.











Upcoming Changes to Brexit Legislation







All goods (EU & ROW) categorised by risk:

HIGH Risk	MEDIUM Risk	LOW Risk
Pre Notification	Pre Notification	Pre Notification
Certificates Required	Certificates Required	Certificates Not Required
100% Inspected	% Inspected	No Inspections.

Important to understand your risk categories:

Plant-based: https://planthealthportal.defra.gov.uk/trade/imports/target-operating-model-tom/tom-risk-categorisations
POAO: https://www.gov.uk/government/publications/risk-categories-for-animal-and-animal-product-imports-to-great-britain

The FBO Address



You must include a business name and address on the packaging or food label of pre-packed food products. This must be either:

- the name of the business whose name the food is marketed under
- the address of the business that has imported the food

You can continue to use an EU, GB or NI address for the FBO on pre-packaged food or caseins sold in GB until 31 December 2023.

From 1 January 2024, pre-packaged food or caseins sold in GB must include a UK address for the FBO. If the FBO is not in the UK, include the address of your importer, based in the UK.

The address needs to be a physical address where your business can be contacted by mail. You cannot use an email address or phone number.

Source: https://www.gov.uk/guidance/food-labelling-giving-food-information-to-consumers#show-the-name-and-address-of-the-food-business-operato







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