

# Movement of SPS products

Duncan Lawson  
DEFRA

**Overview:** Import controls for GB are being introduced in a phased approach in order to give businesses impacted by COVID-19 time to adjust whilst maintaining effective biosecurity controls.

These stages include:

**Sanitary and phytosanitary (SPS) controls, including the requirements for:**

- **Importer pre-notifications (GB importer action)**
  - **Health certification (such as an Export Health Certificate or Phytosanitary Certificate)**
  - **Documentary, identity and physical checks at the border or inland**
  - **Entry via a point of entry with an appropriate Border Control Post (BCP) with relevant checking facilities**
- 
- **Live animals**
  - **Animal products**
  - **Fish and shellfish and their products**
  - **Plants and plant products**
  - **High-risk food and feed not of animal origin**

## Export of Products of Animal Origin (POAO) under safeguard measures

- **The GB importer must:** Pre-notify in advance of arrival using **IPAFFS** and provide the EU exporter with the unique notification number (UNN).
- **You must:** Add the **UNN onto the health certificate** and provide the GB importer with an electronic copy of the health certificate
- **The GB importer must:** Upload an electronic copy of the health certificate on to **IPAFFS**.
- **You must:** Ensure the original health certificate travels with the consignment.
- **Safeguard measures:** Action can be taken at **very short notice** to prohibit or restrict imports of certain products from certain countries following an outbreak of disease or a public health issue.

If measures are introduced because of a new or emerging disease, there may be additional steps you will need to follow to pre-notify - **outlined on [Gov.uk](https://www.gov.uk)**

## Export of live animals

- **The GB importer must:** Pre-notify arrival using **IPAFFS** at least one day in advance and supply the EU exporter/Official Veterinarian (OV) with the Unique Notification Number (UNN)
- **You must:** Add the **UNN onto the health certificate** and provide the GB importer with an electronic copy of the health certificate
- **The GB importer must:** Upload an electronic copy of the health certificate on to **IPAFFS**
- **You must:** Ensure the original health certificate travels with the consignment
- **Physical checks:** Will be carried out at destination

## Export of high priority plants

- **Phytosanitary certificates** are required for imports of high-priority plants and plant products.
- **You must:** Ensure the phytosanitary certificate, where possible, travels with the consignment
- **Documentary, identity and physical checks** of high-priority plants and plant products are carried out at places of destination.
- The list of high-priority plants and plant products can be found on [Gov.uk](https://www.gov.uk).

## 1 October 2021

- **POAO and (ABP):** Requirement for Export Health Certificates, documentary checks and pre-notifications using IPAFFS introduced
- You must provide an electronic copy of the Export Health Certificate to the GB importer, to upload onto the notification in IPAFFS
- **HRFNAO:** Requirement for pre-notifications using IPAFFS introduced

## 1 January 2022

- **POAO and ABP:** Goods required to enter via a point of entry with an authorised BCP in order to undergo documentary, identity and physical checks as required
- **HRFNAO:** Goods required to enter via an established point of entry with an authorised BCP in order to undergo documentary, identity and physical checks as required
- **High-priority plants and plant products:** Identity and physical checks move to BCPs
- **Regulated plants and plant products:** Pre-notifications required, requirement for phytosanitary certificates and documentary checks introduced

## 1 March 2022

- **Live animals:** Live animal BCPs will be operational by this point
- **All regulated plants and plant products:** Identity and physical checks conducted at BCPs

What are the new phases for delivery of SPS import controls on POAO?

## October 2021:

- POAO (animal products for human consumption) must be accompanied by an export health certificates (issued by the competent authority in the EU country) and pre-notified using IPAFFS before arrival at the border
- Certain composite products are exempt from SPS controls at the border under Article 6 of [Decision 2007/275](#).
- The EU exporter must:
  - Ensure that **the original health certificate** accompanies the consignment.
  - Provide a copy of the health certificate to the GB importer to upload a copy onto IPAFFS.
- The requirements already in place for POAO under safeguard measures will continue.

## January 2022:

- POAO will require pre-notification using IPAFFS and must be accompanied by an export health certificate unless an exempt composite product under Article 6 of [Decision 2007/275](#).
- POAO must arrive at an established point of entry with an appropriate Border Control Post (BCP).

# Composite Products

**Overview:** Composite products are food containing both **processed** Products of Animal Origin (POAO) and products of plant origin.

Composite products must follow the phased requirements of POAO and these goods must be pre-notified and accompanied by a Export Health Certificate from October 2021 unless otherwise exempt.

## Some goods are exempt if they:

- contain <50% processed animal product;
- contain no meat product; and
- meet the requirements in Article 6 of Decision 2007/275.



# Animal By-Products (ABPs)

What are the new phases for delivery of SPS import controls on ABPs?

## October 2021:

- ABP not for human consumption must be accompanied by a Export Health Certificate, official declaration or other official documentation depending on the commodity being imported.
- For ABP, pre-notification using IPAFFS before arrival at the border will be required.
- The EU exporter must:
  - Ensure that **the original** Export Health Certificate accompanies the consignment.
  - Provide a copy of the Export Health Certificate to the GB importer to upload a copy onto IPAFFS.
- The requirements already in place for high-risk ABP under safeguard measures will continue.

## January 2022:

- ABP must be accompanied by a GB health certificate or other official documentation, depending on the ABP commodity being imported.
- Further guidance on commodity-specific requirements can be found in the Import Information Notes: [APHA Vet Gateway: Import Information Notes \(defra.gov.uk\)](https://www.defra.gov.uk/apha/vet/gateway/import-information-notes)
- ABP will need to arrive at an established point of entry with an appropriate Border Control Post (BCP).
- For ABP products, pre-notification will be required.

# Animal By-Products (ABPs)

What are the new phases for delivery of SPS import controls on ABPs?

## January 2022:

- Importers will need to check if the CN (Combined Nomenclature) code for their product is listed in Regulation 2019/2007 in order to determine whether their commodity must be imported via a point of entry with an appropriate BCP.
- Goods will be subject to documentary, ID and physical checks on a risk basis.

What are the new phases for delivery of SPS import controls on live animals and germinal products?

## October 2021:

- The requirements already in place for live animals and germinal products will continue.

## January 2022:

- Germinal products must continue to be accompanied by a GB health certificate and pre-notified in IPAFFS before arrival at the border.
- There are new requirements for germinal products to enter via an established point of entry with an appropriate Border Control Post (BCP).

## March 2022:

- Live animals must also enter via an established point of entry with an appropriate BCP for documentary, identity and physical checks.
- High-risk live animals imported from the EU to GB will continue to be checked at 100%.

## What are the new phases for delivery of SPS import controls on plants?

### From 1 January 2022:

- Physical and identity checks of high-priority plants and plant products will move from Places of Destination to Border Control Posts.
- The requirement for pre-notification and phytosanitary certificates will be extended to all regulated plants and plant products (i.e. not just those which are ‘high-priority’).

### From March 2022:

- The UK’s Border Operating Model will be fully operationalised with physical and identity checks on all regulated plants and plant products being carried out at Border Control Posts.

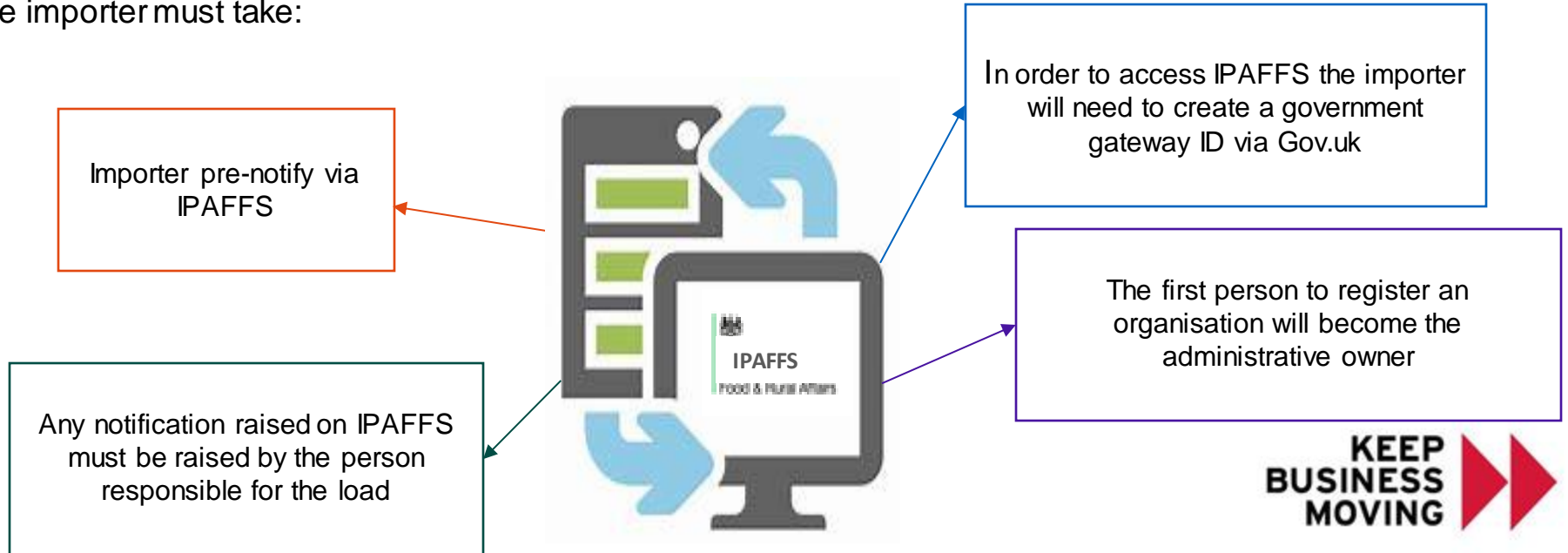


UK Government

# Importer pre-notification process - IPAFFS

**Overview:** From October 2021, POAO for human consumption and some ABP arriving from the EU or EEA countries will need to be pre notified via The Import of Products, Animals, Food and Feed System (IPAFFS)

**IPAFFS:** GB national system for notification of the arrival of SPS goods into Great Britain. Below is the process the importer must take:



**KEEP  
BUSINESS  
MOVING** 

# Pre-notification times

- For movements of live animals, importers need to submit import pre-notifications via the domestic notification system (IPAFFS) at least one working day in advance of the goods' arrival at the point of entry.
- For plants and plant products, importers need to submit import notifications at least four working hours prior to arrival for Roll-On Roll-Off and air movements, or at least one working day prior to arrival by all other modes of transport – along with the phytosanitary certificate.
- Pre-authorisation by Defra/APHA of ABP prior to any imports taking place may also be required.

# Export Health certificates



## General Overview

**From January 2021:** POAO under safeguard measures must be accompanied by an Export Health Certificate.

**From October 2021:** POAO for human consumption and ABP not for human consumption must be accompanied by an Export Health Certificate.

## Certification Steps

1. The **Export Health Certificate** is issued by the competent authority in the EU country.
2. The **EU exporter** is responsible for obtaining the health certificate.
3. The **EU exporter** must provide the importer with an electronic copy of the export health certificate for it to be uploaded to IPAFFS.
4. The **EU exporter** must ensure **the original certificate** travels with the consignment.

## Links to further information:

- Model Export Health Certificates are available [here](#)
- **If there is no GB health certificate for your commodity visit [Gov.uk](#) for an import licence**
- If there is no import licence, you should complete an [IV58 form](#) on gov.uk and email a completed version to [imports@apha.gov.uk](mailto:imports@apha.gov.uk)

# IUU fishing requirements

Since 1 January 2021, imports of most fish from the EU\* have required validated illegal, unreported and unregulated (IUU) documents including:

**Catch certificate(s):** It is the responsibility of the exporter to ensure that a catch certificate, is completed at the point of export.

**Processing Statement:** If fish has been processed in a country that is not the flag state of the original catching vessel, a processing statement must be provided.

**Proof of storage:** If fish has been stored in a country that is not the flag state of the original catching vessel, then proof of storage is required.

▶ These documents must be completed by the exporter, validated by the relevant competent authority, and then sent to the importer.

▶ The importer must then send these to the appropriate port health authority of the port of arrival in advance.

\* These requirements also apply to fish imports from RoW



# IUU fishing requirements

All third country fishing vessels are required to land into appropriately designated ports <https://psc.neafc.org/designated-contacts#GBR> and submit the relevant port state control form if catching in the NEAFC convention area.

Third country fishing vessels landing **fresh fish** into GB, are also required to, in advance of landing:

- **submit a prior notification form;**
- **submit a pre-landing declaration;**
- **send a complete and validated catch certificate; and**
- **adhere to customs formalities**

Third country **food-approved vessels (i.e. factory, freezer, and reefer vessels) landing frozen or processed fish** will also need to:

- **From 1 October: complete a Captain's Certificate and pre-notify on IPAFFS**
- **From 1 Jan '22: land into points of entry with appropriate BCP**

**Full requirements are outlined here:** <https://www.gov.uk/guidance/importing-or-moving-fish-to-the-uk#direct-landings-by-foreign-fishing-vessels-into-the-uk>

# Be prepared...

Actions to take 1<sup>st</sup> October 2021

For POAO and ABP not for human consumption:  
Make sure you provide the importer with an electronic copy of the **health certificate**.  
Make certain the **health certificate travels with** the consignment.

Actions to take 1<sup>st</sup> January 2022  
(Plants)

- Make sure you the **phytosanitary certificate** and where possible travels with the consignment.
- Make sure the importer submits a pre-notification.

For all information and guidance please visit [Gov.uk](https://www.gov.uk)



*“It is very useful to know that the UK will publish non-compliances for plant health interceptions on a weekly basis, although until 2022 this will include high-risk plants (like seeds or plants for planting) but will not include EU fruits and vegetables (F&V). Regarding the additional declarations the UK has published, it seems that those do not affect EU F&V exports, as they are exempted from most import requirements (the UK regulation includes a sentence saying that 'Any third country other than EU Member States'). The situation may be different for plants for planting for which there seems not to be such an exclusion. Could the UK confirm the scope (types of products covered) and timelines for the publication of non-compliances and for the additional declarations?”*

*“Could the UK indicate when it will provide more information on remote documentary checks processes?”*



*“Could the UK indicate, as soon as possible and before 2022, which options for performing plant health controls away from the border on a long term basis, for instance through trusted trader schemes” could be put in place?”*

*“It seems the UK aim is to introduce the capability to use the ePhyto platform 'during 2021'. However, once connected, in principle the UK will have to begin bilateral discussions with NPPOs of all trading partners using ePhyto to agree on launching exchanges with the UK. Therefore, could the UK indicate when it would be ready to start such discussions?”*



*“Identification of the lorry and of the ferry that must be known in advance: This information must be completed when completing the health certificate in the official computer file. This is done some days in advance before the official veterinary comes in the factory for signature.*

*With the BREXIT and the Covid situation, it is frequent that lorries have delays. Transport companies have problems to give the identification of the lorry in advance due to delays in their transport. In addition, it is not seem ideal in our opinion to be obliged to return a lorry for a new health certificate if they miss the ferry.*

*Therefore, could the UK consider accepting that the identification of the lorry is completed on the health certificate, when the lorry arrives in a factory for loading?”*

*“Can UK authorities confirm that compound feed containing products of animal origin are excluded from the scope of the ABP legislation as implemented in the UK?”*

*“Is the use of aquatic ABP as fishing bait permitted?”*

*“Could the UK indicate if the ABPs certification (starting from 1 October) cover fresh products, ingredients and complete/complementary feed?”*

*“Could the UK indicate if the official certificates required for ABPs and for products containing ABP (starting from 1 October 2021) are required also for premixes or additives containing ABP?”*

*“Knowing that the official certificates for products of non-animal origin (such as feed premixes and additives) are not required, could the UK indicate if certificates for products of non-animal origin will be provided/required in the future?”*







Department  
for Environment  
Food & Rural Affairs

# EU to GB Groupage & Mixed Loads consignments of Animal Products

Policy Options v.6 (intro ext.)

28 June 2021

# Definitions

**Consignment:** A number of animals or quantity of goods covered by the same official certificate, official attestation or any other document, conveyed by the same means of transport and coming from the same territory or third country. Article 3 of OCR 2017/625\*

‘**Groupage**’ is not a legally recognised term but rather a word industry uses to define many different things, including grouping of consignments for export onto a single lorry. Groupage, within this document, is defined as the commercial grouping of multiple consignments within a single sealed trailer or container.

**Mixed consignment:** a single consignment containing a mixture of different products of the same commodity type (single EHC), for example, a consignment of “composite products” containing pizzas, quiches and sandwiches all covered by the same health certificate.

**Mixed load:** a lorry/container containing multiple consignments (multiple EHCs). This includes both multiple consignments of SPS interest and lorries carrying both SPS and non-SPS consignments. However, in practice, importers will likely want to avoid mixing both SPS and non-SPS goods to prevent the SPS checks at the BCP, delaying the non-SPS commodities from clearing import checks.

**Official (veterinary) Seal:** An official seal applies if a seal is affixed to the container, truck or rail wagon under the supervision of the competent authority issuing the certificate.\*\*

\*\*See: <https://www.gov.uk/government/publications/how-to-complete-a-health-certificate-for-imports-to-great-britain/how-to-complete-a-health-certificate-for-imports-to-great-britain> \*See <https://www.legislation.gov.uk/eur/2017/625/contents>

# Context

1. Introduction of SPS import controls on animal products has implications for existing models of EU to GB imports of groupage and mixed load consignments.
2. In conjunction with DAERA, Defra has *developed a number of models for GB to NI groupage*, and we are *exploring options for movements of goods from the EU in to GB*.\*
3. As part of this process, we are looking to *determine which possible models may help to facilitate the movement of these goods in to GB*, while still providing the *biosecurity and public health guarantees* we expect, and that *are compliant with other elements of the wider GB import regime*.
4. We are working closely with *key stakeholders to determine and test suitable options*, where possible, with enough time to communicate the requirements *ahead of the introduction of import controls*.

---

\*<https://www.daera-ni.gov.uk/articles/daera-guidance-collection-and-movement-sps-goods-great-britain-northern-ireland-through-groupage>

# Main models under consideration

- A. Consolidation Hub / Single Lorry Seal
- B. Sequential / Single Lorry Seal
- C. Linear / Multiple Pallet-Level Seals
- D. Hybrid or Other (as per workstream input)

## Assumed shared elements between models

### Pre arrival

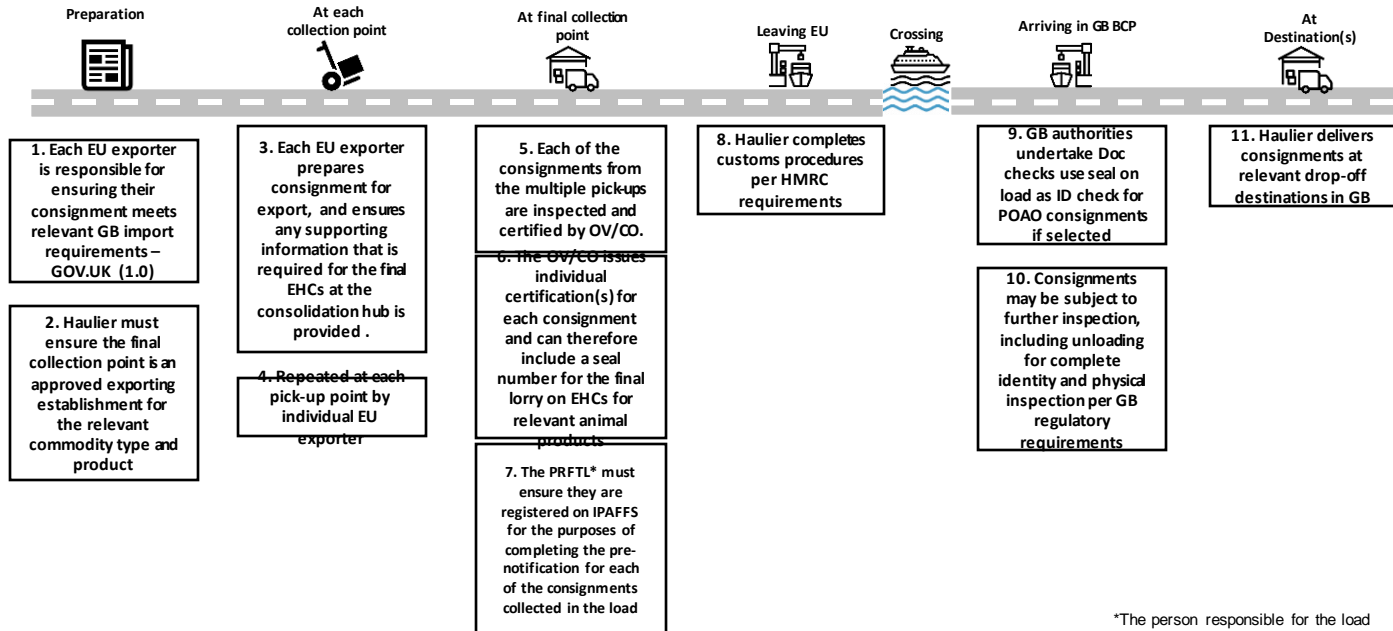
- Sealing of a consignment under official supervision (i.e., by a CO)
- Certification of the individual consignments
- IPAFFS pre-notification, alongside completion of mandatory fields in individual EHCs.

### GB BCP

- Consignments presented to BCP for an identity inspection, or a risk based physical inspection *should* they be selected.

# A. Consolidation Hub / Single Lorry Seal

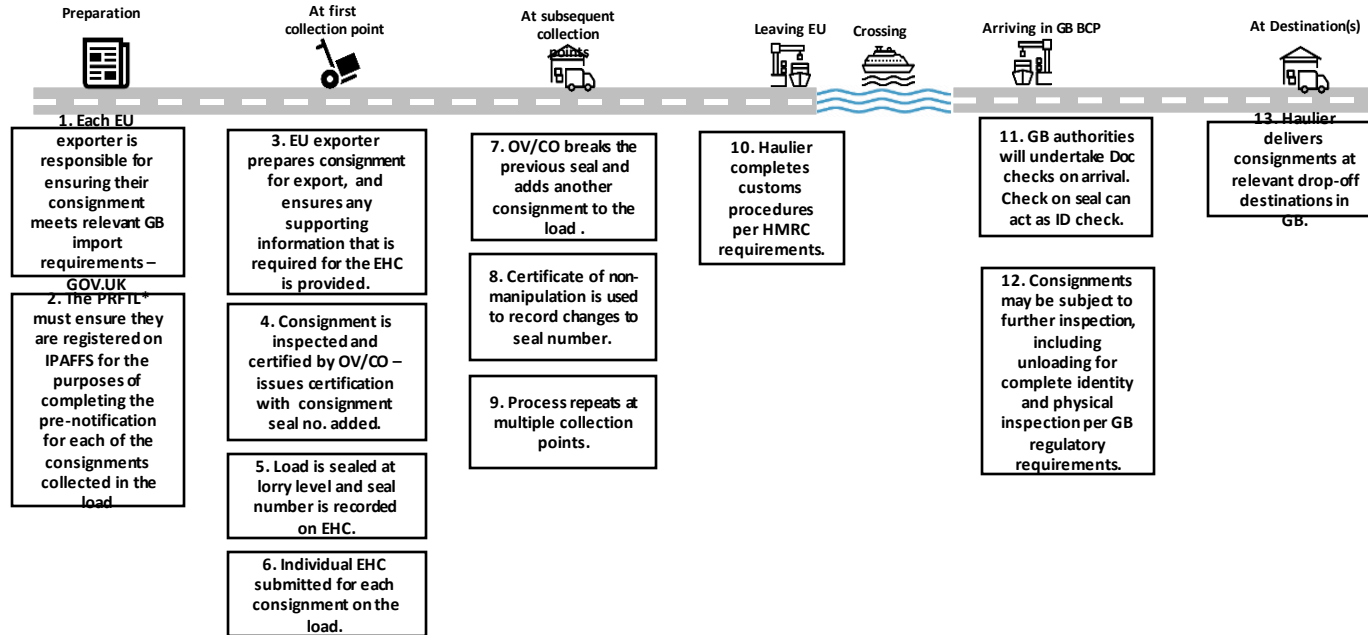
- Different consignments brought together at a single approved premises / “consolidation hub”.
- At final point of collection the certifier issues relevant certification(s) and can therefore include a seal number for the final lorry on EHCs for relevant animal products.



\*The person responsible for the load

# B. Sequential / Single Lorry Seal

- Designed to facilitate pick-ups from multiple sites, with certification at those sites, with a seal applied to the overall load at different pickups, removed and replaced at each pickup.
- Reliant upon certificate of non-manipulation proposed by Defra to EU Commission and accepted for use.



# Annex 1: Certificate of non-manipulation

DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS  
SCOTTISH GOVERNMENT  
WELSH GOVERNMENT



Non-manipulation certificate no: \_\_\_\_\_

CERTIFICATE OF NON-MANIPULATION OF CONSIGNMENTS ALREADY ON A MEANS OF TRANSPORT AS NEW CONSIGNMENTS ARE ADDED AS PART OF A MULTIPLE PICK-UP

MEANS OF TRANSPORT (vehicle registration/trailer/container number): \_\_\_\_\_

I, the undersigned Certifying Officer/s, hereby certify that:

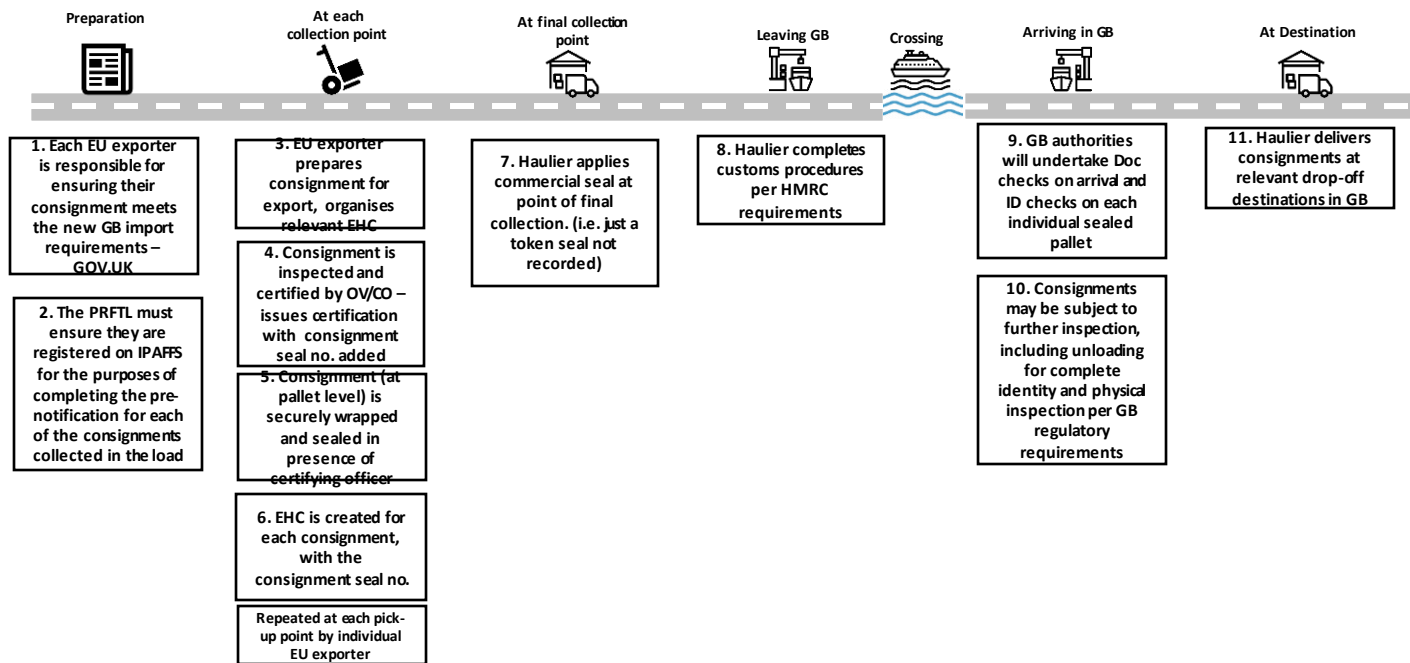
- a) the above means of transport was sealed with the seal numbers specified in column 1 of the table below and if/they matched those mentioned on health certificate/s referenced in column 2;
- b) the seal/s was/were intact when it/they was/were removed under official supervision to load the consignment described in health certificate/s referenced in column 3;
- c) the means of transport was then sealed under official supervision with the seal number/s mentioned on the health certificate/s referenced in column 3 and specified in column 4;
- d) the contents already on the means of transport has not been tampered with during this process.

Column 1 Seal number/s that were removed	Column 2 Certificate number/s with seal number/s in column 1	Column 3 Seal number/s which replaced those in column 1	Column 4 Certificate number/s with seal numbers in column 3	Certifying Officer's Stamp, Signature and Date

- Signed by the Certifying Officer(s)
- Travels with the load and is updated as each consignment is added
- Accompanies the load to the BCP and needs to be reconciled with the seal on the load at the point it arrives in BCP
- Requires a CO to be present at the point each consignment is added to the load so they can witness/undertake the sealing

## C. Linear / Multiple Pallet-Level Seals

- Very similar to model B, aside from the fact that instead of an official seal being applied by the certifying officer to each load at each collection point, is reliant on pallet-level sealing – either by or in the presence of the certifying officer – and then an overall seal being applied by the haulier (as opposed to a certifying officer).



\*The person responsible for the load



## Annex 2: Pallet level seals



- Acceptable forms of pallet level seal would include:
- Strapping with shrink wrap where the straps cross over both ways where possible and seal attached at the cross-over points prevents items being removed or added to the load.
- Wire wrap with shrink wrap fixed with a seal on top
- Sealed reusable large netting (or other cover) over multiple pallets
- It is permissible to seal the consignment within part of the trailer or container, provided that there is only one point of physical entry to the consignment, and the seal is applied to that point of entry.
- For smaller consignments, boxes sealed with security void tape will ensure the integrity of the box is preserved and inform of unauthorised removal.

See also: DAERA Guidance for the Collection and Movement of SPS Goods from Great Britain to Northern Ireland through Groupage  
<https://www.daera-ni.gov.uk/articles/daera-guidance-collection-and-movement-sps-goods-great-britain-northern-ireland-through-groupage>

# Questions and comments welcome

