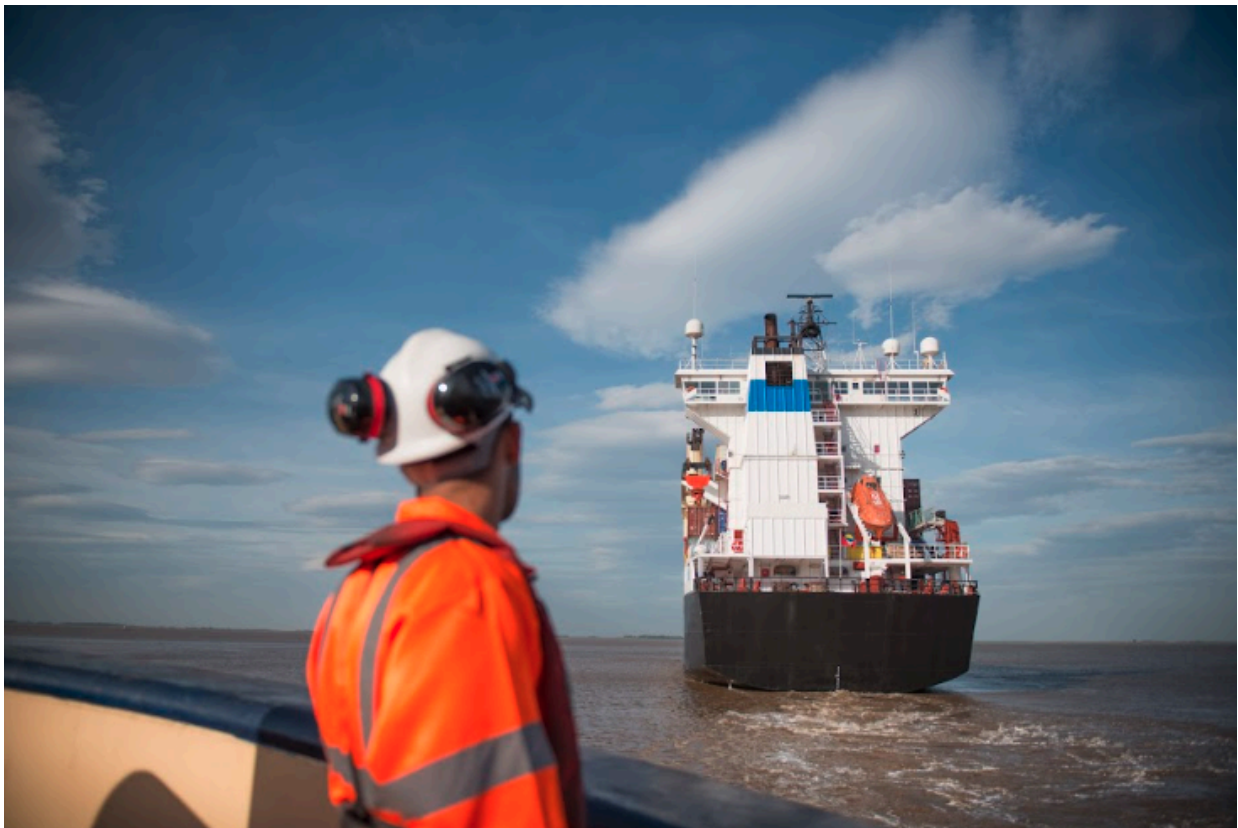




Borders Bulletin

18 June, 2024



Message from Cabinet Office

✉ Dear Stakeholders,

As always, we thank you for your hard work in recent months to ensure that your business has been ready to implement the Border Target Operating Model (BTOM) requirements.

In this edition of the Borders Bulletin, you will find important operational Border Target Operating Model information and guidance from Defra and other recent updates.

Updates inside

- **Preparing your load for inspection and getting it right at Sevington**
- **High-risk food and feed not of animal origin (HRFNAO) – definition and processing**
- **Frozen fish fingers risk categorisation**
- **Histamine Canned Fish - Update**
- **New Export Health certificates are required for certain Products of Animal Origin (POAO) for export to EU /movement to Ireland**
- **Use of Verifiable PDF Health Certificates**
- **How to avoid ‘no match’**
- **Multiple EHCs on one CHED - compliance**
- **Paying your SPS charges**
- **Resources to help you comply with new BTOM rules**
- **Continuous and/or deliberate non-compliance**
- **Helplines**

Preparing your load for inspection and getting it right at Sevington

You can do several things to help reduce the amount of time your goods will spend at a Border Control Post (BCP).

Place goods that have high inspection rates at the back of the load, immediately in front of the doors, so they can be accessed quickly and easily. If we need to remove other pallets of goods, to access goods for inspection, this may result in a delay.

If your driver is sent to Sevington Inland Border Facility, they will need to tell the staff at the front booths that they are carrying import goods and are there for a Defra/Border Control Post (BCP) Sanitary and Phytosanitary (SPS) check and present the Goods Movement Reference (GMR) to the staff at the front booths. Where possible, drivers should also carry and present the CHED reference number. Staff will then direct you to the Border Control Post (BCP) part of the site, to enable a Sanitary and Phytosanitary (SPS) check on the goods to take place. Doing this will avoid the delay associated with incorrectly being directed to the HMRC part of the site, before being redirected to the BCP.

To find out which plants and plant products are more likely to be stopped for inspection, visit our Plant Health [Portal](#).

HRFNAO – definition and processing

Any high risk food and feed not of animal origin (HRFNAO) imported into the EU, cleared for free circulation in the EU and re-exported to Great Britain is considered high-risk. This includes, but is not limited to peanuts, dried grapes and herbs such as coriander and basil. For a more complete list of HRFNAO products please see [Implementing regulation - 2021/608 - EN - EUR-Lex \(europa.eu\)](#).

HRFNAO that is imported into the EU remains a product of the country of origin unless it is processed in the EU. In terms of food law ‘processing’ means any action that substantially alters the initial product. Processing includes: heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes. Examples of ‘unprocessed products’ include (but are not limited to): divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.

You can watch a short [presentation](#) on importing HRFNAO or [read the Import high-risk food and feed of non-animal origin from the EU to Great Britain on GOV.UK](#) and the Food Standards Agency [guidance on Importing high-risk food and feed of non-animal origin into](#) GB.

Frozen fish fingers risk categorisation

We have received questions about the risk categorisation of frozen fish fingers. They are considered low-risk if made with wild caught fish. Please note this is not a change to any risk categorisations.

The BTOM risk category list by commodity code states that CN1604199190 is fillets of other fish species - raw, merely coated with batter or breadcrumbs, whether or not pre-fried in oil, frozen. Wild caught fish is defined by the following risk categorisation. A wild caught fishery product will be in the low BTOM risk category if it meets all the following criteria:

- it is not live or would be unable to survive if returned to the environment (‘not viable’)
- it comes from an approved establishment and is identified accordingly
- it has not been subject to processing, as defined in Article 2 of Retained EU Regulation 852/2004 – for example, by heating, curing, smoking, maturing, drying, marinating, extraction, extrusion or a combination of these
- it is accompanied by the required illegal, unreported and unregulated (IUU) documents, for example, a valid catch certificate and proof of storage and processing, where applicable
- it is not fish that is associated with histamine (that is, species of the families Scombridae, Clupeidae, Engraulidae, Coryfenidae, Pomatomidae or Scombrosidae)



Histamine Canned Fish - Update

As you will be aware, for all products in the BTOM medium-risk category we expect importers to provide an Export Health Certificate (EHC), alongside their prenotification.

Last week Defra communicated a three-month period (until 15 August 2024) of flexibility for importers of EU origin shelf-stable fishery products associated with histamine. Entry of these goods will be permitted without an EHC if traders are unable to obtain a certificate (usual commercial documents will still be required).

We are now offering a similar flexibility (until 15 August 2024) to these products originating from non-EU countries that have been imported into the EU then re-exported to GB. Exporters must include the original EHC, which clearly states the country of origin (i.e. not the EU), within their commercial documentation to use this easement. This flexibility does not apply to non-EU imports direct to GB.

This is not a change to the risk categorisation, but as we are providing clarity traders have requested on the classification of these goods, we are implementing this temporary easement to support businesses.

New Export Health certificates required for certain Products of Animal Origin (POAO) for export to EU /movement to Ireland

Purpose

This article is to notify traders of the publication on 31 May 2024 of new Export Health Certificates (EHC) for Products of Animal Origin (POAO) intended for human consumption, for export to the European Union (EU), movement to Northern Ireland or transit through the EU to a third country; and to advise traders of the transitional period.

From **31 May 2024**, Defra's amended EHCs will be published on EHC Online (EHCO) and traders can begin to use the new POAO EHCs for export from GB.

A list of the EHCs to be published on 31 May 2024 in Annex I can be found below.

Key Timelines:

- From **31 May 2024** – traders can use the new POAO EHCs for export from GB.
- Between **15 June 2024 and 15 September 2024**, the existing/old EHCs can continue to be used, where the certificate has been issued no later than the **15 June 2024**. This authorisation is applicable for entry into the EU or for transit through the EU to a third country.

If certifiers hold blocks of the old EHCs, they must have been issued before **15 June 2024** or they will not be accepted by EU Border Control Posts. Any certificates not signed before this date will need to be cancelled on EHCO.

Further Information

APHA's Centre for International Trade – Carlisle, email: exports@apha.gov.uk Telephone: 03000 300 201

WM	Fresh meat intended for human consumption, excluding offal, minced meat and mechanically separated meat, of wild land mammals other than ungulates and leporidae	8379
RM	Fresh meat intended for human consumption, excluding minced meat and mechanically separated meat, of farmed rabbits	8380
MP-PREP	Meat preparations intended for human consumption	8383
MPNT	Meat products intended for human consumption, including rendered animal fats and greaves, meat extracts and treated stomachs, bladders and intestines, others than casings, that are not required to undergo a specific risk-mitigating treatment	8384
MPST	Meat products intended for human consumption, including rendered animal fats and greaves, meat extracts and treated stomachs, bladders and intestines, others than casings, that are required to undergo a specific risk-mitigating treatment	8385
CAS	Casings intended for human consumption	8393
FISH-CRUST-HC	Live fish, live crustaceans and products of animal origin from those animals intended for human consumption	8361
EU-FISH	Fishery products intended for human consumption caught by vessels flying the flag of a Member State and transferred in third countries with or without storage	8362
FISH/MOL-CAP	Fishery products derived from bivalve molluscs intended for human consumption entering the Union directly from a reefer, freezer or factory vessel flying the flag of a third country as provided for in Article 21 (2) of Delegated Regulation (EU) 2022/2292	8363
MOL-HC	Live bivalve molluscs, echinoderms, tunicates, marine gastropods and products of animal origin from those animals intended for human consumption	8364
MILK-RM	Raw milk intended for human consumption	8469
MILK-RMP/NT	Dairy products intended for human consumption derived from raw milk or dairy products therefrom, or both, that are not required to undergo a specific risk-mitigating treatment	8467
DAIRY-PRODUCTS-PT	Dairy products intended for human consumption that are required to undergo a pasteurisation treatment	8468
COLOSTRUM	Colostrum intended for human consumption	8357
COLOSTRUM-BP	Colostrum-based products intended for human consumption	8358
FRG	Chilled, frozen or prepared frogs' legs intended for human consumption	8394

SNS	Snails intended for human consumption	8395
GEL	Gelatine intended for human consumption	8390
COL	Collagen intended for human consumption	8396
RCG	Raw materials for the production of gelatine and collagen intended for human consumption	8397
TCG	Treated raw materials for the production of gelatine and collagen intended for human consumption	8398
HON	Honey and other apiculture products intended for human consumption	8391
HRP	Highly refined products as described in Section XVI of Annex III to Regulation (EC) No 853/2004, intended for human consumption	8399
REP	Reptile meat intended for human consumption	8381
INS	Insects intended for human consumption	8400
PAO	Other products of animal origin derived from domestic ungulates, poultry, rabbits or fishery products intended for human consumption and not covered by Articles 8 to 26 of Implementing Regulation (EU) 2020/2235	8392
COMP	Non-shelf-stable composite products and shelf-stable composite products, containing any quantity of meat products, except gelatine, collagen and highly refined products, any quantity of colostrum-based products, and intended for human consumption	8350
TRANSIT-COMP	Transit through the Union to a third country either by immediate transit or after storage in the Union of non-shelf-stable composite products and shelf-stable composite products, containing any quantity of meat products, any quantity of colostrum-based products, and intended for human consumption	8351
STORAGE-TC PAO	Products of animal origin and certain goods that originate in the Union, are moved to a third country or territory and moved back to the Union after unloading, storage and reloading in that third country or territory	8461
Private Attestation	Private attestation	8352

Use of Verifiable PDF Health Certificates

As of 31st January 2024, verifiable PDF's can be used for live animals and POAO imports from EU and EFTA countries where the PDF health certificate can be electronically verified.

These certificates must be created directly in either TRACES or an equivalent EU / EFTA Member State's National SPS Export System. The PDF certificate downloaded from TRACES or other approved EU/EFTA country systems must be uploaded to IPAFFS. A list of nations we are accepting Verifiable PDF

certificates from is available at [Countries Great Britain will accept validated PDF GB health certificates from - GOV.UK \(www.gov.uk\)](#).

If the exporter creates a GB health certificate as a verifiable PDF using TRACES or another EU/EFTA Member State system, they will not need to send the original (paper) health certificate with the consignment.

They must send the official, verifiable PDF certificate to the importer once it has been signed by the competent authority. The importer is responsible for creating the IPAFFS notification and uploading the verifiable PDF.

Please be aware that the **easement period** for sending scanned copies of health certificates, including original paper certificates and verifiable PDF's **is temporary**. Upon its expiry, if a trader uploads a scanned copy of a health certificate, they will be required to present the original paper certificate or verifiable PDF to the Border Control Post (BCP) on arrival. A Part II CHED will not be generated until all relevant checks on the original document presented at the BCP have been undertaken. **To avoid unnecessary administrative burden and allow for a smoother flow through the BCP, traders are strongly encouraged to adopt verifiable PDF health certificates today.**

If a paper certificate is used it must bear the signature and stamp of the certifying officer. Verifiable PDF certificates must bear a valid digital signature. You must also check attestations are completed in accordance with the model certificate 'notes for completion' and all non-applicable attestations are correctly deleted or omitted from the certificate.

Deletions carried out by hand must be initialled and stamped. If completed electronically as a verifiable PDF the signature and stamp per page is sufficient.



How to avoid 'no match'

To help you avoid delays to your consignments Defra and HMRC have produced a [step-by-step video](#) and technical information sheets on how to [prevent](#) and [resolve](#) a 'no 'match' in the Customs Declaration Service (CDS). Defra and HMRC cross-check information provided by importers in their Part I CHED and customs declaration to ensure the CHED reference and commodity code are consistent. Any mismatches between this data will result in consignments being directed to a BCP for further checks.

Multiple EHCs on one CHED - compliance

In most instances, traders will need to have a separate Common Health Entry Document (CHED) and Export Health Certificate (EHC) for each commodity that they are importing. By complying with this, traders will avoid experiencing unnecessary delays and costs.

For [compound products](#), each medium risk POAO element of a compound product must have its own health certificate. Composite products from the EU may need to be accompanied by a health certificate, [please review guidance on GOV.UK](#).

Multiple low risk products can be included on one CHED, but only if they meet all the requirements listed below:

- have the same country of origin and the same country of consignment
- are travelling on the same transport to the same place of destination and
- are covered by the same commercial documentation

Paying your SPS charges

You should always pay your documentary, identity and physical inspection charges on time.

PHA's and the Animal and Plant Health Agency (APHA) will be following up on late payments, and there may be further penalties if they are not paid. Importers are encouraged to establish the applicable SPS charges as soon as possible. Each PHA or Local Authority (LA) will have their own method of payment so please visit the relevant PHA/LA website or contact them direct to ensure you are ready to make the payment. Payments to APHA will be invoiced weekly to the person responsible for the load, notified on IPAFFS.

Resources to help you comply

Contact points for urgent BTOM queries

Any urgent BTOM/import queries for plants and plant products across England & Wales should be directed to the Animal & Plant Health Agency (APHA), initially by email: phsi-importers@apha.gov.uk

Alternatively, you can contact them by telephone: +44 (0) 3000 200 301

Any urgent BTOM/import queries for animal products should be directed to the Port Health Authority (PHA) at your nominated Border Control Post (BCP).

Find your PHA contact details at your nominated BCP on this [map](#).

If you need technical help with IPAFFS you should call the Animal and Plant Health Agency (APHA) helpline on 0330 041 6999 or email APHAServiceDesk@apha.gov.uk

Resources to help you comply

Read our extra [summary of common errors](#) and follow these top tips to get it right at the border.

Our detailed guidance has been updated with information on how to comply with your new legal responsibilities for:

- [importing live animals and animal products to Great Britain](#)
- [importing plants and plant products from the EU to Great Britain](#)
- [importing plants and plant products from non-EU countries to Great Britain](#)

Read our [Leaflets](#) to help businesses prepare for a new approach to importing goods to GB under the BTOM.

[Visit our YouTube channel and watch recordings of our previous webinars for traders.](#)

Continuous and/or deliberate non-compliance

It has come to our attention, that some traders and logistics companies are making continuous and/or deliberate errors including:

- mis-declaring goods as low risk when they are medium, or as medium when they are high
- not including a relevant Export Health Certificate (EHC) or Phytosanitary certificate
- including multiple EHCs on one CHED

Continued non-compliance within either the EHC or the CHED is not acceptable and will not be tolerated by Port Health Authorities (PHAs). Deliberate misdeclaration is a criminal offence. PHAs will be actively looking to identify such behaviour.

Where there is repeated non-compliance or evidence of misdeclarations, the appropriate authority will take statutory action. This will result in goods being held at a Border Control Post (BCP) for a physical inspection, which may lead to the consignment being ultimately returned or destroyed at cost to the person responsible for the load.

Animal & Plant Health Agency (APHA) Contact info

When?	Who?	How?
For urgent BTOM/import queries for plants and plant products	Animal & Plant Health Agency (APHA)	Email (priority route): phsi-importers@apha.gov.uk Tel (secondary route): 03000 200 301

**For urgent
BTOM/import
queries for
animals and
animal products**

**Animal & Plant
Health Agency
(APHA)**

**Email (priority route):
imports@apha.gov.uk
Tel (secondary route):
03000 200 301**

Helplines

Here is the list of helplines you may find useful. We have added hyperlinks that will take you to pages that provide extra information such as the opening hours for the helpline all of which have sufficient capacity to support businesses.

- [HMRC Customs & International Trade Helpline](#) - 0300 322 9434
- [HMRC Imports and Exports General Enquiries](#) (including GVMS) - 0300 322 9434
- [New Computerised Transit System](#) - 0300 322 7095
- [DVLA Contact Centre](#) - 0300 790 6802
- [DVSA](#):
 - Vehicle Operator Licensing Enquiries - 0300 123 9000
 - International Road Haulage Permits - 0330 678 1117
- [The Office for Product Safety and Standards](#) - 0121 345 1201
- [MHRA Customer Service Centre](#) - 020 3080 6000
- [National Supply Disruption Centre](#) - 0800 915 9964
- [Rural Payments Agency \(RPA\) Trader team](#) - 0330 041 6500
- [Animal, Plant and Health Agency \(APHA\) & IPAFFS](#)
 - General Enquiries- 0300 100 0313
 - IPAFFS technical - 0330 041 6999
 - PEACH - 0345 607 3224
- [Defra Rural Services](#) - 0300 020 0301
- [Environment Agency England](#) - 03708 506 506
- [Forestry Commission](#) - 0300 067 4000
- [Fish Exports Helpline](#) - 0330 159 1989
- [The Intellectual Property Office](#) - 0300 300 2000
- [Citizen Advice Consumer Helpline](#) - 0808 223 1133
- [Department for Education Helpline](#) - 0370 000 2288
- [Home Office - UK Visas & Immigration Helpline](#) - 0300 790 6268
- [Home Office - EU Settlement Scheme Application Resolution Centre](#) - 0300 123 7379

Import and Export Guidance

- Import/export general enquiries can be made directly to HMRC via:

Telephone - 0300 322 9434

Textphone - 0300 200 3719

You can also [speak to an adviser online](#) about general import and export queries.

DEFRA also provides guidance regarding commodity codes [here](#).

If you would like to contact DEFRA, they have a number of helplines which can be found [here](#).

This Bulletin is provided by Cabinet Office Borders Group.