

Brussels, 11th January 2024
UECBV Ref: LB - 28628

EWG Concern on Border Target Operating Model (BTOM)

Introduction :

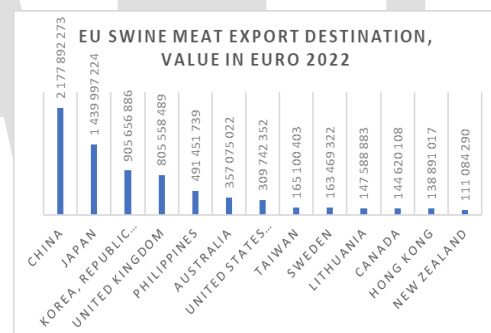
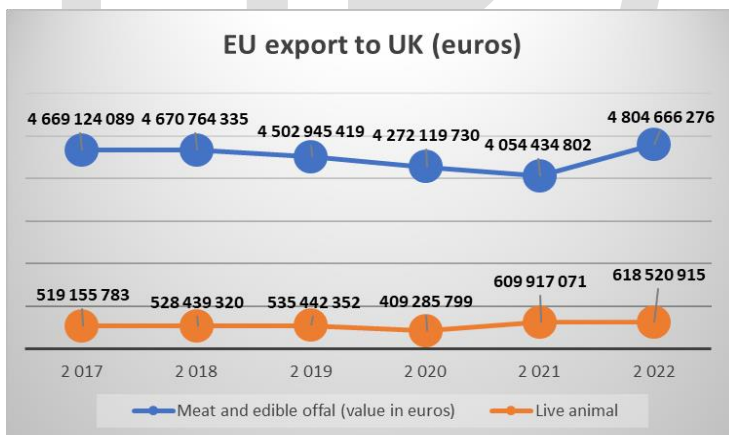
Due to the coming changes with UK, UECBV is raising following issues to be solved and technical question to answered.

State of Play:

After a number of delays, the new BTOM regulation will be implemented on 31 January 2024. Many questions are being asked and exporters are concerned about the difficulties they will encounter from 31 January. This document outlines the concerns of UECBV exporting members.

Table UK-EU trade

The UK is a major trading partner, and its importance is crucial to European meat exports. The UK is the 4th most important destination for pork exports.



It is therefore imperative that this transition is carried out as simple and flexible as possible to avoid any congestion, delays or difficulties in the export of goods.

Problems with health certificates (HC)

- In all the HC for meat, in some part it's needed to provide the code of territory as it appears in a document relating to 'fresh meat of ungulates' published on gov.uk, in accordance with Commission Regulation (EU) No 206/2010 ([Fresh+Meat+of+Ungulates.pdf](#))

establishment under the control of an official veterinarian; of 12 March 2010

AH/A001 Animal requirements (residency)

has been obtained from animals that:

(¹) **EITHER** [have remained in the territory described in AH/T since birth, or for at least the last three months before slaughter;]

(²) **AND/OR** [have been introduced on (dd/mm/yyyy) into the territory described in AH/T from the territory/ies with code(s) that at that date was authorised to import this fresh meat into Great Britain;]

(³) **AND/OR** [have been introduced on (dd/mm/yyyy) into the territory described in AH/T, from Great Britain;]

It is not possible, for the MS Veterinarian Authority, to confirm that at the date the territory was authorized to import this fresh meat, as there is no historic of the UK zoning list. To find the status (according to the UK list) of the area where the pork was reared in the past (let's say the pork is 1 year old, so it requires the status of the area 1 year ago in the UK list) and MS official veterinarian need an historic of the list.

Also these codes don't refer to EU, that means that the official control from member state need to go to this list, go to the link if needed and if these links are update and functional, and find the equivalence for EU code.

The consequence will be, as all the requirements are very fastidious, that official vet will not sign these certificates because these are too binding. Some MS authorities have already exchange with operator, explaining operator will have to limit their export with pigs coming from members state where there no contaminated zones at all, to avoid any confusion and be sure that the certificates will be sign by veterinarian (eg Belgium that will accept only pigs comings from BE, FR, NL and DK – all countries with no contaminated zones).”.

- The UK certificates as they are drafted for the moment require that meat coming from another MS than the exporting one will have to be send with a pre-certificate. Pre-certification, sometimes for very small amounts of products, will be first extremely expensive and an extra administrative burden for the companies (companies even not used with export to third countries), which means they will maybe not deliver anymore to another member states in the purpose of exporting to the UK, and secondly will add another pressure on the amount of certifying agents available. A certificate based on the EU legislation, or at least a recognition of equivalence with the EU legislation could be a solution
- Another concern for meat preparations produced in another member state and certified in in another member state: in the notes of the [UK health certificate for meat preparations](#) there is this requirement:

AH/P603 Product requirements

- (a) By certifying this attestation, you confirm that the product/commodity was obtained only from fresh meat originating in territories approved for import into Great Britain as it appears in the relevant document relating to 'fresh meat of ungulates', 'poultry and poultry products' or 'meat of wild leporidae, of certain wild land mammals and of farmed rabbits' published on GOV.UK^(†), and that it complies with the GB animal health import requirements as laid down in Regulation (EU) No 206/2010, Regulation (EU) 798/2008 and Regulation (EU) 119/2009, as applicable to the specie(s) or category(ies) of product.

Only meat from the concerned exporting third country can be utilised in the manufacture of the meat preparations.

At this moment this interpreted by MS authorities as that only meat preparations produced in the one MS can be exported to the UK. To avoid this restriction due to MS authorities interpretation , this statement should be correct and clearer.

- Regarding importation, the territory list of third countries differs between the UK list and the EU list. This could be a difficulty for trading beef as on small items these lists differ

and it makes it difficult for certifying officers to check everything. To facilitate trade, the lists need to be in line with each other, as a result presenting an import certificate would be sufficient.

Concern with certification and veterinarian capacity

- Fresh meat needs to be kept at a strict temperature during transport, that it is transported in energy-hungry refrigerated containers, and that any delay entails additional costs and may pose a risk to the quality of the food being transported.

Some European countries export only fresh meat, and these orders are very "dynamic" in the sense that processing times are very short (an order may arrive in the morning and the shipment leave in the late afternoon), so it is difficult to request certification well in advance. What's more, in some European countries, exporting companies are concentrated in certain areas, which is likely to exacerbate delays.

We encourage to avoid issue, it is needed to ensure that:

- The number of certifying agents is sufficient and adapted to current export volumes.
- There is no congestion in the systems for issuing certificates, as it is common for many certificates to be requested at the same time (usually at the end of the day).
- Flexibility at veterinary level for certification requests that arise after office hours or at weekends.
- Commission published the required UK health certificates in TRACES-NT, but an exchange and a training for operator are essential.
- Many European countries are experiencing difficulties in terms of veterinary capacity, as well in slaughterhouses for meat inspection as for delivering export certificates. MS need to develop a system for digitally / from distance certification and to allow only a percentage needs a physical visit from an inspector, as it is already the case in some MS.
- Regarding the category risk made by UK, to avoid a risk of increasing delays, UK authority should keep composite products in the low TOM risk category or to be exempt from import controls. In the same line, the UK authority should extend the low risk category to all products of animal origin that have undergone a processing step that ensures they are ready-to-eat .
- Regarding the changes in the categorisation, it should be taken into account that a long transitional period should be considered because producers need to streamline their production and the entire supply chain. Sourcing of goods and requested documents needed for certification need to be implemented into those organisations and production.

In conclusion, the exporting members of the UECBV are all concerned about the difficulties they are likely to encounter from 31 January. To offset the risk of insufficient certification services, whether in terms of staff numbers or availability, we believe it would be appropriate to set up and make available to exporters a remote certification system, to ensure the flexibility of the services and to ensure that they are available to exporters.

UECBV will be open to discuss solution as soon as possible.

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