



Seafood and Meat Export to the EU

CIEH response to EFRA Committee call for evidence

February 2021

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Key points

1. Which seafood and meat exports have been particularly affected by border delays and disruptions since 1 January, and why?

Our members have advised of problems affecting all seafood and meat exports since 1 January. The key reason being that, given that the UK has left the EU, all UK exports of products of animal origin to the EU must now be accompanied by export health certificates (EHCs) to provide assurance that the products meet the health requirements of the destination country.

2. What impact have delays and non-tariff barriers on seafood and meat exports to the EU had on UK businesses?

Businesses have incurred additional costs in obtaining EHCs and sorting out problems with documentation.

Delays have been caused by border control post checks in destination countries. Consignments are inspected and questions raised, which must be answered satisfactorily before the consignments are released. On occasion, further documentation has been required.

The rules for exporting food are complex. There is a lack of knowledge and understanding about how the new export system operates; business report differing advice given by government departments and border control posts. For example, whether one export health certificate can be issued with multiple destinations. This is a complex issue which is about customs duties rather than health issues. Exporting businesses can no longer use “groupage” and this is a significant blow for many businesses and has forced a change in business practice and models. A central point of advice for businesses would be very helpful but it should involve both customs and health as customs rules can determine how the export health certificate should be completed (consignor details).

Currently the issuing of EHCs for products other than fish and fishery products, must be by an official veterinarians (OV). This includes for meat, meat products, meat preparations and dairy products. There is a shortage of suitably qualified OVs available to carry out this work. In England and Wales the OVs that issue EHCs on behalf of APHA (Animal & Plant Health Agency), are employed in the private sector. The requirement for only qualified OVs is largely derived from the EU. In the UK and Ireland environmental health practitioners (EHPs) deliver food official controls. They are highly trained, competent professionals. Food safety and standards form a core part of their academic and practical training. Indeed many of the businesses that have been experiencing problems with exports are regulated by EHPs employed by local authorities. EHPs are familiar with the businesses they regulate, understand their processes and are local.

We support the submission made to this inquiry by Chapmans of Rye (fish producers) and the shared Environmental Health service of Rother & Wealden District Councils in which they propose that qualified EHPs should be authorised to sign all categories of export health certificates. Not just, as is currently the case, EHCs for fish and fishery products. This would potentially significantly increase capacity for EHCs, as well as provide more options for businesses.

3. What steps should the UK Government take to mitigate these issues? What should its short and long-term priorities for action be?

Our members have advised of problems sourcing import agents and that a published list of available agents would be very useful for businesses.

Businesses have reported difficulties in obtaining the services of an OV especially when they are a small/medium size business with an irregular export pattern. It may not be financially viable for OVs to complete this work, especially when there are travel costs involved. We have been advised that local authority EHPs have been approached to provide EHCs for a range of products produced by their local businesses but because of current restrictions requiring the services of OVs, they have not been able to assist even when they have the capacity, skills and knowledge required. This lack of professional support will have a negative impact on local economies. In the past EHPs were temporarily authorised to issue EHCs during the foot and mouth epidemic; this could be repeated as an interim measure, while the matter is negotiated with the EU.

A priority for government should be to increase environmental health workforce capacity.

4. How effective and timely will the Government's proposed £23 million support package for seafood exporters be?

No comment

5. How useful and responsive were the guidance and support provided by the Government to business, before and since 1 January?

No comment

6. What can the UK learn from other countries who export food to the EU?

No comment

7. How ready is the UK to introduce checks on food imports from the EU during 2021, and are there lessons to be learnt from the issues that UK exporters have faced?

Our members, particularly those employed as Port Health Officers have advised that there are workforce shortfalls, with several authorities currently running recruitment campaigns. It is unlikely they will be able to recruit sufficient numbers of suitably qualified officers and this has the potential to lead to delays on imports. The FSA has recognised the workforce pressures and has recently consulted on proposals to reduce the qualification requirements for those delivering food official controls. We have concerns about the potential impact of this direction of travel and are working to build capacity in the workforce through our [ChooseEnvironmentalHealth](#) campaign.