

UK Meat Trading: Review of Current Situation & Prospects for Trade Facilitation



The International Meat Trade Association

July 2021

Who We Are

The International Meat Trade Association (IMTA) is the leading UK trade association in facilitating the trade in meat, both for exports and imports.

Our trading members (importers and exporters) are predominantly based in the UK, with a few based in the EU-27.

Our associate members come from the wider industries around the meat trading sector, such as customs clearance, transport and insurance and bring specific expertise from across the supply chain to the association.

IMTA's Key Asks on Import and Export—EU and Rest of World

- ⇒ That the UK and EU work together to solve the biggest two-way challenges facing traders on trade to and from the EU— including finding a **workable solution on groupage, resolving prohibitions and restrictions on certain products** e.g. chilled mince, and by **agreeing a New Zealand style veterinary agreement** to reduce rates of SPS checks and allow trade to flow faster.
- ⇒ Increased **use of electronic systems and documents** to avoid unnecessary paperwork, reduce errors and speed trade, both for trade with the EU and the Rest of the World.
- ⇒ A push on obtaining **approval for export of UK meat to new markets**, and reopening of closed markets to increase returns for producers and exporters, and to improve carcase balance.
- ⇒ **Completion of WTO negotiations on quotas** resulting from the UK leaving the EU, and communication on administration of quotas.
- ⇒ More **consultation, advanced warning and communication from government on upcoming changes to the regulatory environment**—to help traders navigate a constantly changing trading and regulatory environment.

WTO - World Trade Organisation



IMTA's Perspectives on Challenges and Opportunities for Traders Now and into the Future



Our Role and What We Do for Members

IMTA believes **two-way trade is essential to deliver carcass balance, food security and consumer choice**. This is why as a trade association we have dedicated a great deal of time to assisting our members to navigate Brexit over the last few years, and why we have been closely monitoring the impact of the Covid-19 pandemic on trade and supply.

Traders' Agility and Outstanding Hurdles

Traders have needed to **be agile and plan for multiple scenarios** along the way in order to keep their business in line with changing policy. All while working to take advantage of **new opportunities** as they arise, like the recent success story of **UK poultry meat market access being granted to Japan**.

This paper summarises the key **outstanding areas which must be addressed** in order to facilitate trade for our members, and supply of food to the UK and other countries. It also reflects on some of the **key impacts we have seen from both Brexit and Covid**.

Our Members' Role in Supplying Food and How they have Risen to the Occasion

The last 12 months have demonstrated the **integral role of a 'meat trader' in facing new challenges** including those that could not have been predicted and adapting and navigating a rapidly evolving trade landscape with Brexit, Covid, **the situation in global shipping and issues with labour supply**.

IMTA members have risen to the occasion in seeking to **keep food supplies moving** to ensure UK consumers have adequate supplies and choice and that **customers in export markets continue to be served**.

Why this Paper and Why Now?

This paper is timely given the **substantial changes in the UK trading sphere**. For food in particular, these changes have included the **conclusion of free trade agreements** with Japan and Australia, as well as the signing of dozens of continuity agreements with countries around the world.

Government is also looking to the future with work on **Border 2025** and certainly the global pandemic has illustrated the urgency of moving to **more digitised trading systems** and away from antiquated paper-based ones.

UK ministers and officials have proved themselves highly adaptable and have engaged well with IMTA, to help us guide our members into the future. We hope that this paper is **a useful guide to policymakers** on the key priorities we see for the coming months.

The Role of the Meat Trader: Adaptability and Constant Change



Ever-Changing Landscape and Importance of Timely Engagement

- For the last few years companies have been inundated with messaging on all things Brexit, be that new customs requirements, need for SPS certification on export to the EU, immigration policy or labelling changes.
- With such substantial, and constant regulatory change, in some senses it's amazing that they still have time to focus on the day job of buying and selling food! The fact that they have kept the country fed through Brexit and the Covid-19 pandemic is a testament to their skills and adaptability.
- Figure 1 demonstrates that trading is a complicated business which requires specialised knowledge.
- A key lesson to come out of the last few years for us as an association is that, in order to avoid disruption to trade, traders need as much time as possible to adapt to changes.
- While sometimes, as with the pandemic, such seismic changes couldn't have been predicted, with Brexit, more notice could have been given to help ease trade.
- For instance, the Trade and Cooperation Agreement (TCA) between the UK and EU was only announced on Christmas Eve 2020, with it coming into force on 1st January 2021.
- With such short notice, the mass confusion we saw in relation to the customs and Rules of Origin arrangements was unsurprising, but could have been avoided with more notice and proactive communication.

Expertise and Role of the International Meat Trader—Figure 1



For more on the vital role played by the meat trader see our [paper here](#)

The Role of the Meat Trader: Adaptability and Constant Change (cont.)

The Importance of Timely Engagement

- For food supply to run smoothly, traders need more advance warning of changes as contracts are agreed months and months in advance. Proper notice of changes allows supply chains time to adapt. Failing to provide proper notice causes unnecessary confusion, added costs, delays and disruption which is bad for business, enforcement authorities and ultimately customers and consumers.
- Members must now contend with 10+ different trade routes (see Figure 2) and have to work out the rules in relation to customs, rules of origin, quotas (TRQs), Sanitary and Phytosanitary (SPS) rules, labelling and port infrastructure for all of them so they are under immense pressure.
- The predictability of customs and SPS arrangements for import and export is crucial for our sector.
- Figure 1 demonstrates the vital role traders fulfil, therefore government should seek to make trading as facilitative and predictable as possible.
- A positive to come out of the difficult year the trade has gone through is that due to the need to adapt, use of electronic documents instead of paper was permitted temporarily in some areas.
- This proved it is possible, and indeed pref-

erable to work with e-documents.

Government should seek to move urgently to electronic documents as much as possible, for instance for certificates of origin, quota documents and SPS documents. This would help to future proof us against any future, unforeseen events such as the pandemic. Losing this easement where there are already a number of logistical challenges for supply chains could hinder both traders and enforcement in no longer having this flexibility.

Evolved Trade Flows—Figure 2

Pre 1 st January trade flows	Post 1 st January trade flows
Import into UK (or EU)	Import from Rest of World into GB
Export from UK (or EU)	Import from EU into GB
	Export to EU from GB
	Export to Rest of World from GB
	GB to Northern Ireland for GB goods
	NI to GB
	Rest of World into NI
	Rest of World into NI via GB
	Import from EU products from Rest of World
	Export from EU to Rest of World
	Re-export GB-EU in each direction
Note: There are now many other variables involving combinations of GB, NI, EU, RoW product moving in different directions	

Carcase Balance

UK consumers have a preference for certain types of meat, such as chicken breast and steaks. UK production cannot meet total demand for these specific cuts and therefore we import from the EU and further afield to ensure UK consumers have access to sufficient quantities. In turn the parts of the carcass not so popular with the UK consumer such as dark chicken meat and offal are exported to markets which have more of a taste for them. This is essential for carcass balance, reducing waste and adding value to the producer. Traders pay a massively important role in making this happen, by developing relationships with meat plants abroad to source whole containers of these preferred cuts to bring to the UK, and by consolidating full containers of less preferred cuts, such as chicken feet and pig stomachs to send to markets where they are more valued. This is where the expertise outlined in Figure 1 comes in.

The Current State of the Meat Trade

- The EU has historically been the UK's main trading partner for meat on import and export, and due to its geographical proximity and wealthy consumer base, will continue to be, however, since the start of the year the impact of being a third country to the EU has been felt. Meat traders have experienced delays at borders, increased costs, an extreme slow down in trade volumes as can be seen in Table 1. On some of these initial teething issues, trade and government worked together to improve compliance and ease trade. However there are some remaining issues that cannot be unilaterally overcome, and must be negotiated with the EU.

Brexit



- Meat traders have worked extremely hard to adapt to the new global reality. One of the biggest challenges was the sudden closure of food service in the UK and other countries globally last year. Importers with product on the way to the UK had to find alternate outlets or had the costly contractual difficulty of cancelling orders. Conversely UK exporters struggled when restaurants shut in Europe and further afield. With indoor dining now re-opening, members have had to adapt quickly to source product. There is a constant element of risk to contend with, as at any moment rules could change again.

Covid



- The onset of the global pandemic in spring 2020 impacted the global shipping situation. Containers were displaced and the cost of shipping increased dramatically. Closures at ports in Asia meant empty containers could not be returned, resulting in a global imbalance of containers. Delays clearing product at UK ports were also an issue due to staffing issues and social distancing measures reducing port capacity. Shipping costs remain extremely high in spring - summer 2021.

Shipping



- Members have highlighted difficulties recruiting staff so far in 2021. Many EU nationals, who previously worked in food sector and transport roles, returned home due to Brexit and the pandemic. Changes to immigration policy is impacting workers wanting to come from EU; making it difficult to recruit. In particular, there are currently huge difficulties recruiting drivers and hauliers. The UK driver workforce is also ageing and more drivers are retiring than are being trained.

Labour



Northern Ireland

Continuing trade with Northern Ireland has been a particular challenge. There are many schemes for members to familiarise themselves with in order to continue to serve the NI market from GB and Rest of World (see Figure 3). However, government assistance and facilitations to help supply the NI market, are largely geared towards those supplying retail, those supplying the hospitality sector in NI need to be included too. Proving goods stayed in NI under the UK Trader Scheme is a challenge. We urgently need a solution to enable the import under UK tariff rate quotas direct into Northern Ireland as this puts non-EU imports at a disadvantage to those from the EU. Details of a reimbursement scheme of tariffs paid on goods ultimately consumed in NI are needed urgently.

Trading with Northern Ireland Schemes—Figure 3

STAMNI (Scheme for Temporary Agrifood Movements to NI)

TSS (Trader Support Service)

UKTS (UK Trader Scheme)

MAS (Movement Assistant Scheme)

DAS (Digital Assistance Scheme)

P & R Goods GB to NI

Export from the UK to the EU: The Story so Far & Looking Forward

UK Exports of Meat to the EU (tonnes) - Table 1

	Jan-April 2020	Jan-April 2021	% Change
Chilled Beef (CN 0201)	24,790	14,265	-42%
Frozen Beef (CN 0202)	7,196	4,207	-42%
Pigmeat (CN 0203)	37,723	17,053	-55%
Sheepmeat	22,786	17,205	-24%
Red Meat Offal (CN 0206)	19,593	15,362	-22%
Poultrymeat (CN 0207)	118,763	63,637	-46%
Processed meat (CN 0210)	5,614	2,587	-54%
Grand Total	236,464	134,314	-43%

Source: HMRC

Why the Significant Falls Across Every Category?

- ⇒ Change in the UK-EU trade relationship from 1st Jan 2021
- ⇒ Imposition of requirement for Export Health Certificates (EHCs) and veterinary checks
- ⇒ New Rules of Origin requirements
- ⇒ Prohibitions and Restrictions – e.g. export of chilled mince banned
- ⇒ Covid-19 pandemic – restaurants on the continent closed
- ⇒ Change in methodology to the collection of the trade stats– statistics not directly comparable

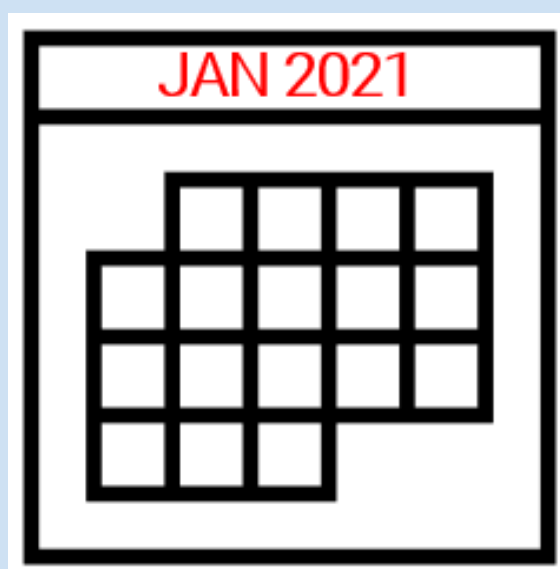
A Rocky Start to the Year

The fall in export is likely partially due to traders, faced with new and unfamiliar systems, holding off trading at the start of the year.

Those that chose not to hold off faced significant issues including: rejections at EU borders due to paperwork being filled out incorrectly, unworkability of groupage as a third country including hauliers refusing to take groupage loads due to the added complexities and lack of understanding of Rules of Origin.

Some delays were so severe that due to diminished shelf-life meat had to be destroyed.

IMTA worked with government in various fora to share members' issues and seek resolutions. Compliance of UK EHCs for the EU is now much higher than at the start of the year.



The issues outlined in Table 2 are outstanding and need urgent resolution.

Export from the UK to the EU: The Story So Far & Looking Forward (cont.)

Priority Hurdles to Overcome on UK Export of Meat to the EU—Table 2

Issue	Suggested Solution
Requirements for paper documents slowing trade down	The EHCO export certificate system needs to allow electronic certificates to be sent to TRACES NT and national systems like the Dutch system.
Increased Costs	Costs related to EHCs for the EU are high for traders—the vet must be paid to produce it, the hauliers to process it and pre-notify the EU of arrival and internal company staff time to oversee everything. Traders must allow for extra time for possible delays and inspections at a Border Control Posts (BCP). All of this has to be paid for—if companies are struggling due to this, government should consider additional support for them. Any support given to meat processors in relation to this should also be open to traders.
Challenges with Groupage	Work with EU to resolve this (more on this on pages 15-16 of this paper).
APHA Resourcing	The volume of EHCs needed is astronomically higher now than before the end of the Transition Period. Across all certificates in the first four months of 2021, APHA issued more than 100,000 certificates to the EU, compared to less than one thousand in the same period of 2020. The demand for corrected and replacement certificates is high. APHA should be allocated more resource to deal with this, on top of Rest of World export and the day-to-day.
Prohibitions and Restrictions; Re-export	The UK is unable to export certain meat preparations and meat products to the EU e.g. chilled mince and sausages and EU or NI origin fresh meat which has come to GB e.g. for cutting. This is proving difficult for companies to adapt to - given our previously highly interlinked supply chains. This needs to be solved in the TCA SPS Committee as a matter of urgency (more on this on page 15 of this paper on two way solutions).

Export from the UK to the Rest of World: The Story So Far & Looking Forward

UK Export to Rest of World (RoW) (ex. EU)

- As can be seen from Table 3, in the first four months of 2021 the UK's overseas exports increased, largely due to increased exports of pigmeat and offal to Asian markets.
- This highlights how important it is to have veterinary access to markets in the rest of the world, as in the same period our exports to the EU fell substantially.
- While Rest of World markets can be highly valuable for products less favoured by UK consumers, market access work is required to open new markets.
- If there is a large surplus of product with no available market, this will bring down returns to producers.
- Markets can suddenly close due to a disease outbreak in the UK or even for politically influenced reasons. Therefore, in order to minimise the risk we need new markets opened all the time, and government resource put into maintaining or re-establishing existing or temporarily closed markets.
- The UKECP and ECUG models are working well, for respectively red meat and poultrymeat market access work.

UK Exports to Rest of World—in Tonnes - Table 3

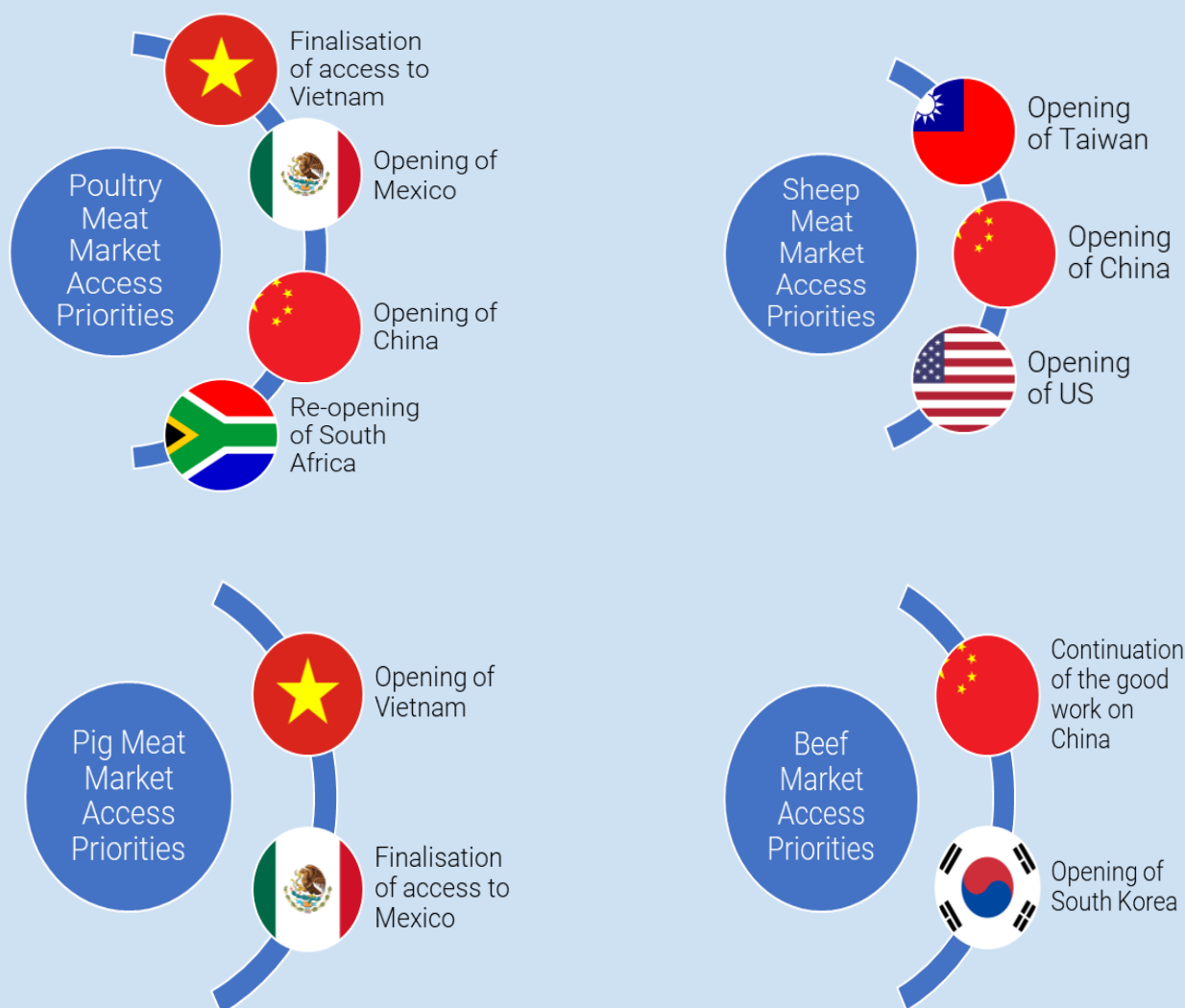
	Jan-April 2020	Jan-April 2021	% Change
Chilled Beef (CN 0201)	4,015	929	-77%
Frozen Beef (CN 0202)	6,235	7,781	+25%
Pigmeat (CN 0203)	43,008	50,983	+19%
Sheepmeat (CN 0204)	2,131	2,603	+22%
Red Meat Offal (CN-0206)	31,462	36,795	+17%
Poultrymeat (CN -0207)	33,209	32,325	-3%
Grand Total	120,059	131,416	+9%

Source: HMRC



Export from the UK to the Rest of World: The Story So Far & Looking Forward (cont.)

IMTA's Priority Markets to Gain or Improve Access to for UK Meat - Figure 4



IMTA Offer of Assistance on Export to both the EU and Rest of World Markets

IMTA is ready to assist government with delivering the solutions to the hurdles outlined on export to the EU on page 8, through organising Working Groups, providing member feedback and liaising with our European Trade Association. We will continue our engagement with UKECP and ECUG to identify and work to access, or maintain access to, rest of world markets.

Suggestions

- ⇒ Where FTA negotiations are ongoing or starting, these should be harnessed to drive forward any pre-existing SPS market access work. The benefits of a reduced tariff on exports under an FTA can only be realised if SPS access is in place.
- ⇒ To seize the opportunities on export—the Defra market access teams should be adequately resourced.
- ⇒ The UK should have additional UK Agri-Food Counsellors based on the models we see working well in China and the Gulf.
- ⇒ Intervention at high political level can push SPS market access over the line—this should be used more frequently, e.g. visits to the RoW market in question.



Import from the EU to the UK: The Story So Far & Looking Forward

Import from the EU since the start of the year and going forward:

- As seen in Table 4, imports from the EU also fell in the first four months of the year, note in particular the decrease in imports of chilled beef from the EU.
- Similar to the points on UK export to the EU, the fall may relate to traders taking time to familiarise themselves with the new systems, and deal with new customs requirements even if making deferred declarations.
- Some of the most significant changes on import from the EU haven't happened yet. Only from October 2021 will EHCs be required, and from January 2022 physical checks.
- January is a difficult time for such a big change to come into force as staff from both the public and private sectors will be taking leave over Christmas. In the meat sector in particular, Christmas is a hugely busy time of year due to peaks in demand so making preparations for physical checks starting January 1st will be a challenge.
- UK government should carry out an intense programme of engagement in both the UK and EU to ensure UK importers and EU exporters are prepared for the changes, so we don't see the same kind of issues we saw on export to the EU at the start of the year.
- The requirements and checks should be carried out in such a way not to disadvantage importers following the rules or create an unfair playing field.
- Communication on locations of BCPs should be timely, and sufficient veterinary resource to carry out checks must be provided if things are to go smoothly, and to avoid any disruption to UK food supply.
- We will revisit the data at a later date to see how October changes impact imports from the EU.

UK Imports from the EU—in Tonnes - Table: 4

	Jan-April 2020	Jan-April 2021	% Change
Chilled Beef (CN 0201)	53,784	33,568	-38%
Frozen Beef (CN 0202)	20,317	18,837	-7%
Pigmeat (CN 0203)	120,379	92,069	-24%
Sheepmeat (CN - 0204)	3,320	1,805	-46%
Red Meat Of-fal (CN 0206)	11,795	9,030	-23%
Poultrymeat (CN 0207)	118,329	98,532	-17%
Processed meat (CN 0210)	58,395	48,377	-17%
Grand Total	386,319	302,218	-22%

Source: HMRC

Why We Need Imports—Figure 5 :

Cuts imported are highly demanded products—e.g. chicken breasts, steaks, beef for mincing

The UK doesn't have enough land or resources to be self-sufficient in meat

Even if the UK produced more animals there would be an excess of cuts like trotters, stomachs and dark poultrymeat without sufficient open markets to export to

Some imports go into the UK processing sector—contributing to jobs and business continuity

Consumer choice—consumers may choose imported product based on its qualities such as taste—a matter of personal preference

For more on this topic see [The IMTA Self-sufficiency Myth Paper](#)

Import from the EU to the UK: The Story So Far & Looking Forward (Cont.)

Technical Asks on Import from the EU - Table 5:

Issue	Suggested Solution
Preparedness for EHCs and physical checks	The UK needs sufficient veterinary resource as well as physical BCP infrastructure to administer new checks speedily and without causing knock on delays on imports from RoW countries. Delays owing to veterinary checks can lead to demurrage costs, lost contracts and impact on product shelf-life. We would be concerned that risks of delays may exacerbate issues with driver availability which are already critical. Increased use of technology , such as tablets to notify completion of checks, should be harnessed. The industry needs clarity on how documentary checks will operate from October, by whom they will be carried out and whether there will be any fees and if so what they will be. Whether the UK has sufficient laboratory capacity should be considered.
Sufficient programme of communication	We know a communication programme is under development; we need tailored communications targeted at UK importers and EU exporters . The process needs to be transparent and understandable by customers, suppliers, agents and vets who all work together to ensure that trade can happen.
Lack of Connection of Systems	Need for electronic certification to link TRACES/ national systems to IPAFFS for electronic submission of health certificates
Challenges with Groupage	Government should continue the good work being done on finding solutions on groupage , including by working with the EU to resolve this (more on this on pages 15-16 of this paper).
Prohibitions and Restrictions (P&R)	Government has stated that from 1st October 2021 GB importers will be unable to import several types of meat and meat preparations from the EU, including chilled minced meat (beef, pork, lamb, mutton and goat) chilled or frozen minced meat (poultry). This is likely to disrupt supply chains and must be resolved.

Import from the Rest of the World to the UK: The Story So Far & Looking Forward

Import from Rest of World

Table 6 shows that import from Rest of World countries to the UK is relatively stable. There was a decrease in import of chilled beef, and sheepmeat generally but that could be due to any number of factors including restaurant closures, fears of delays at ports due to Brexit or changes to global demand. Imports of pigmeat and offal rose, but from a very low base. Much of the policy around import from RoW countries remains the same as before the Transition Period ended—such as the import SPS checks regime. However, there are some areas which need to be clarified or finalised, including:

- ⇒ How countries can request approval for export to the UK, either for country approval, or approval of new establishments within currently approved countries
- ⇒ Process for regionalisation for third countries in case of disease outbreak
- ⇒ Ongoing discussions at WTO with RoW countries on quota splitting between UK and EU due to Brexit—including what the UK shares will be and how they will be administered
- ⇒ How to import under UK TRQs into NI

Suggestions:

- ⇒ On RoW import we saw several easements due to the pandemic, some of these should be made permanent, including allowing clearance of goods based on scanned copies/ electronic copies followed by original documents, this would help to facilitate trade.
- ⇒ E-certification for imports and electronic documents for origin proofs etc. would be beneficial.
- ⇒ There is an urgent need for clearer, more advance warning of changes to certification and communication of grace periods. BCPs, export markets and the trader need to be on the same page and have time to adapt and make changes or this can cause unnecessary delays and added costs.



UK Imports from Rest of World—in

	Jan-April 2020	Jan-April 2021	% Change
Chilled Beef (CN 0201)	1,226	1,054	-14%
Frozen Beef (CN 0202)	447	566	+27%
Pigmeat (CN 0203)	288	346	+20%
Sheepmeat (CN 0204)	21,385	17,177	-20%
Red Meat Offal (CN 0206)	2,231	2,334	+5%
Poultrymeat (CN 0207)	4,703	4,060	-14%
Processed meat (CN 0210)	16,254	18,380	+13%
Cooked Chicken (CN 160232)	68,069	62,456	-8%
Grand Total	114,603	106,373	-7%

Source: HMRC

Import from the Rest of the World to the UK: The Story So Far & Looking Forward (Cont.)

WTO and Tariff Rate Quotas (TRQS)

- IMTA has long had concerns about the way that TRQs were split in the WTO between the UK and the EU.
- In cases such as that of Argentina the UK market has been left with only 111 tonnes of Argentine Hilton quota annually.
- The UK also lost access to the 481 grain-fed beef quota as of January 1st.
- The UK also has only a small share of the Uruguayan Hilton quota and no Paraguayan quota.
- Many of these quotas supplied specific niches within the UK restaurant sector. We will be monitoring the impact of this given the recent reopening of UK hospitality.

We will seek to do a follow-up paper looking at impacts of the resulting UK tariff and TRQ situation following EU Exit.



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IMTA Offer of Assistance on Import from both the EU and Rest of World

Input from industry on policy and legislative proposals, before they are finalised, is crucial in order to make sure that how legislation operates in practice works for industry.

On import from the EU, IMTA is ready to assist government by sharing information with our members, and EU exporters through our European trade association in the hopes of avoiding issues when EHCs and physical checks are required for imports from the EU. IMTA and Defra are working closely, including through IMTA's Borders Working Group, in preparation for the changes from October.

On imports from Rest of World we are ready to convene member meetings to discuss the way forward on SPS or TRQ related matters, and provide feedback to government. On FTAs we are ready to provide feedback to government, including on administration of any quotas within FTAs agreed by the UK.

Two-way Challenges: Where the UK and the EU Need to Work Together

Despite the changed relationship between the UK and EU we still need to work together, as other 3rd countries do with the EU, to ease trade in both directions and ensure adequate food supply and consumer choice. The SPS Committee under the TCA must solve the below issues as soon as possible and it is in the interest of businesses in both the UK and EU for them to do so.

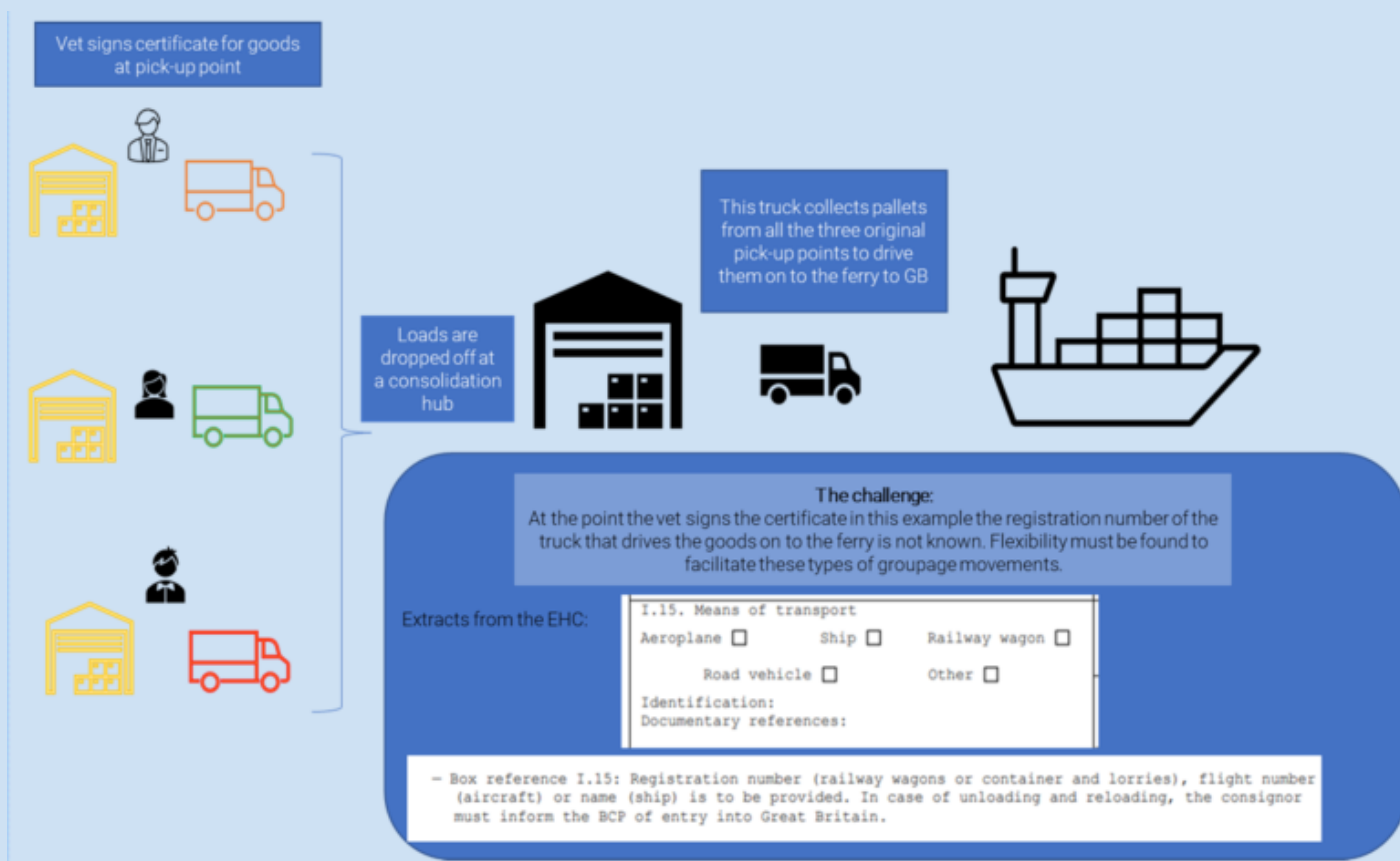
Issues the EU and UK need to work together on - Table 7

Issue	Suggested Solution
Groupage	Groupage is not working currently on export to the EU principally because it is bound by the constraints of legislation designed for EU trade with third countries, half way round the world sending their product on ships. It's not designed to deal with trade between close neighbours of complex loads, comprising shorter shelf life, chilled food. A specific example is on vehicle registration numbers which are a requirement on EHCs. In groupage sometimes you don't know the registration number until 4-5 hours after product has been loaded so it's impossible to put on certificate, which creates an issue for signing vets (see Figure 6 for a diagram explaining this). The UK and EU need to work together in the SPS Committee to find solutions for both for UK exports to the EU and for EU exports to the UK to facilitate groupage.
Veterinary Agreement or Equivalence	A Veterinary Agreement, similar to the UK-New Zealand one, would see a reduction in the level of physical checks for our exports entering the EU, though it may not diminish the rates of documentary or seal checks required. The SPS Certification Working Group, of which IMTA is a member, has released a paper outlining the issues on export of food, faced since the start of the year and calling for government to: 1. Improve current systems to remove archaic bureaucracy, reducing time, error and costs; 2. Review requirements for inspection and certification; 3. Negotiate a form of mutual veterinary agreement with the EU which would ease problems trading food and feed between GB and the EU and GB to NI, and from EU to GB when import controls take effect.
Prohibitions and Restrictions	As referenced elsewhere in this paper, GB companies are currently unable to export certain types of meat, such as chilled mince to the EU; UK government has announced it will impose the same restrictions on EU imports from October. Inability to re-export EU or NI fresh meat from GB back to the EU as fresh meat is a substantial issue being faced by IMTA members. This is due to how the EU model import certificate is written. It was not anticipated that NI product would also be affected. Not being able to bring NI origin meat to GB for cutting or packing to be sent on to the EU represents a severe disruption to the UK internal market which should not be permitted to continue. The UK and EU both have an interest in solving both of these issues in the SPS committee.
Movement of Samples	Several members have faced challenges moving product samples between the EU and UK, in both directions when working with both potential customers and potential suppliers. There are examples of samples being delayed or blocked. The EU and UK should work together to ensure samples can move easily and under a clear legislative framework.

Groupage: What it is and Why it Matters

- Groupage is the joint sending of goods by multiple companies on one truck or the sending of goods of different types, from one company on one truck.
- This requires multiple EHCs usually—the complexity of needing EHCs and facing veterinary checks is multiplied in a groupage load.
- Under groupage the transport company aims to minimise costs by making multiple pickups and drop offs of product owned by multiple companies
- It advantages SMEs as it is more economic -> allowing smaller consignments to be sent
- Consignment might not be just meat – could include other foods such as fish and dairy, owned by different companies
- Better for the environment - groupage reduces vehicle emissions and is more efficient
- Less flexibility in using groupage means higher costs

Groupage: The need for flexibility on requirement for vehicle registration number on the EHC—Figure 6



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