



Brexit Update: major changes for imports of food products from EU to UK

If you import **food, plants or those products** into the Great Britain (hereafter also referred to as “UK”) from an EU Member State (MS) or the Northern Ireland (NI) then changes may apply to you from 1 January 2022 and 1 July 2022.

The grace period on imports from the EU ends on 1 January 2022 and 1 July 2022 and businesses importing food products are subject to pre-notification requirements and have to complete extra paperwork.

New import rules apply to agricultural products and foodstuffs including various processed foods and ‘composite products’.

However, the exemptions apply to certain products, see more details below.

For plants and plant products a phased approach to plant health controls started in January 2021 and will end in July 2022.

Background

There are a lot of changes from 1 January 2021 for an importer from the EU as the UK is not an EU Member State (MS) anymore and a range of post-Brexit checks on EU imports were introduced from this date.

Extra paperwork for imports of food products that was supposed to be introduced on 1 April 2021 and then 1 October 2021 (a health certificate) and 1 January 2022 (a phytosanitary certificate) was further postponed to **1 July 2022**. Pre-notification requirements enter into force on **1 January 2022**.

In addition, businesses will not be able to import certain prohibited and restricted goods from the EU to the UK from **1 January 2022**, see more details [here](#).

Products of Animal Origin

From 1 January 2022

The importer in the UK must pre-notify the consignment in the UK IT system known as the ‘Import of products, animals, food and feed system’ (IPAFFS) about their composite product import from 1 January 2021 unless [it’s exempt](#).

Certain other food import such as high risk food and feed not of animal origin has to be pre-notified.

From 1 July 2022

Animal products will need to continue to pre-notify their arrival via IPAFFS. Additionally, these consignments must be accompanied by a certified Export Health Certificate and enter via a point of entry with a Border Control Post (BCP) that has been designated to receive these goods. The consignment will be subject to documentary, ID, and physical checks.

The health certificate requirements for **composite products** containing processed meat, milk, fish and eggs can be found [here](#).

Exemptions for processed foods / composite products

New paperwork and pre-notification requirements and BCPs/controls do not apply to certain ‘composite products’ provided that they meet criteria of [Annex 2 of the import information note CP/1](#) which provides a list of exempt composite products including their commodity codes which

are exempt and also defines what products fall under exemption.

Products are exempt if all of the following apply, and they're:

- heat-treated - this means the product is shelf-stable at ambient temperature or has undergone complete cooking or heat treatment during manufacture so that any raw product is denatured
- made without processed meat, meat extracts or powders
- made with less than 50% of any other processed POAO (any dairy must come from an approved country and have undergone the correct heat treatment for that country)
- labelled for human consumption
- securely packaged or sealed in clean containers

Other examples of exempt products are:

- confectionery (including sweets) and chocolate that is heat-treated and contains less than 50% of processed dairy and egg products;
- pasta and noodles not mixed or filled with processed meat product, that have been heat-treated and contain less than 50% of processed dairy and egg products;
- bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products that are heat-treated and contain less than 20% of processed dairy and egg products;
- olives stuffed with fish;
- soup stocks and flavourings packaged for the final consumer that are heat-treated and contain less than 50% of fish oils, fish powders or fish extracts.

For example, for **food supplements**, the following are exempt: "Food supplements packaged for the final consumer, containing small amounts (**in total less than 20 %**) of processed animal products (including glucosamine, chondroitin and/or chitosan) other than meat products".

These exempt products are thus exempt from documentation / certification requirements and do not need to be pre-notified and do not need to enter Great Britain through a BCP.

If the composite product is exempt, it needs a commercial document instead, see more details [here](#).

Plant and plant products

For plants and plant products a phased approach to plant health controls started in January 2021 and will end in July 2022. Plant health controls include, e.g. phytosanitary certificates, pre-notification, and various document and physical checks.

From 1 January 2022

All 'high-priority' plants and plant products will continue to require pre-notification and to be accompanied by a Phytosanitary Certificate.

All other plants, plant products and other, which are categorised as 'regulated and notifiable' will require pre-notification but not a Phytosanitary Certificate.

From 1 July 2022

All plants, plant products and other objects categorised as either 'regulated and notifiable' or 'regulated' must be accompanied by a Phytosanitary Certificate

All plants, plant products and other objects categorised as 'regulated' will require pre-notification, but only if instructed to do so upon submitting a customs import declaration

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Contact

Do you have questions or do you need more detailed information? Please do not hesitate to contact us.

Aiki Kuldkepp

Senior Manager VAT

T +31 (0)88 676 97 56

E aiki.kuldkepp@nl.gt.com

Robert-Jan Brethouwer

Partner VAT

T +31 (0)88 676 95 64

E robert-jan.brethouwer@nl.gt.com