

1st December 2020

Rt Hon George Eustice MP
Secretary of State for Environment, Food and Rural Affairs
2 Marsham Street
Westminster
London
SW1P 4F

Dear Secretary of State,

Urgent Action to Support Exporters of Products of Animal Origin to the EU post 1st January

We are writing to signal our urgent concern about the continued unpreparedness of the key agencies that should play a key role in supporting England and Wales based food exporters.

As you know in 2019 the UK exported £2.6bn meat, £2.5bn dairy and £2.3bn fish to the European Union (UK Trade Info). This trade supports hundreds of thousands of jobs across England. UK to EU food exporters are facing an exponential increase in red tape to comply with EU third country rules.

We understand that ultimate responsibility is on businesses to prepare to ensure they are legally compliant if they wish to continue to trade after 1st January 2021. We also accept that some of the existing supply chain arrangements, especially those involving just-in-time delivery constraints or complex arrangements, will have to reorganise in order to continue once the UK is outside the EU single market.

We do not have unrealistic expectations about the continuation of the status quo. However, we believe that UK Government has to play its part, not just in providing guidance and advice, but to get directly involved in supporting the process by which food achieves the necessary certification to be ready for export to the EU (or any other market).

We face a resourcing crisis. We do not have enough vets (certifying officers) to meet the exponential increase in demand that there will be across the food supply chain on the 1st January.

We recognise that the number of qualified Official Veterinarians has increased from c.600 in July 2019 to c.1200 in September 2020, but there is no clarity on how many of these vets, that have undertaken the relevant training course, will actually be employed in meeting the estimated ten-fold increase in demand for export health certificates after 1 Jan. We do know the vast majority will not be working full time on this and will be attending to other practice duties.

This resource crisis is compounded by the unnecessary, complex, and costly attestation process you have proposed to underpin the new certification requirements. We recognise the effort and intent behind schemes like the Group Export Facilitation Scheme, and the prescribed use of 'Support Health Attestations' (SHAs), but these initiatives are too partial in effect, too complex and ultimately too confusing for businesses seeking to continue existing trade with EU customers.

We ask you to take more decisive policy action to both increase certification resource and use your authority to simplify the export process. If this does not happen then we expect there to be a reduction of between 50 and 75% in the volume of trade to the EU (especially to Ireland and Northern Ireland) in the months after the 1st January 2021. We fear that once this trade is lost it will be extremely difficult to recover.

JOINT LETTER FROM UK FOOD AND LOGISTICS INDUSTRY ON READINESS FOR FOOD EXPORTS

We ask you to take the following actions:

- Instruct, and financially support, all OVs employed (directly or indirectly) by the Food Standards Agency or other government agency to play a direct role in supporting the export certification process for products of animal origin.

We recognise that FSA vets are usually employed in vital roles that must continue to be carried out in full, However, this new role is vital too and, as is the case in most major food exporting nations, government must invest more in ensuring the vets it employs play a direct role in facilitating food exports.

We must not allow a situation where extremely finite local authority or other private sector veterinary resource available for export certification is diverted to attend facilities where there are already official OVs present. Not least because it is the OV in situ, who knows the facility and its processes intimately.

- Use the authority of APHA to significantly simplify the guidance on how official veterinarians at the last point of departure before export can rely on existing controls as the basis for having confidence to certify the products for export.

There is a fundamental point of confidence, either the UK authorities believe that our inspection and compliance regime for food safety is robust, or it does not. It is also vital that the guidance and associated communications deliver consistency and clarity of interpretation across the professionals doing the certification.

If you believe our food is safe, and produced to standards at least equivalent to those in the EU market, you must support this by defining a much more pragmatic approach to how a certifying officer can assess the safety and traceability of a product that has been reared, produced, manufactured or packaged in the UK.

Guidance on certification must be based on reliance on existing controls of Food Business Operators and commercial traceability documents. It must also provide confidence and certainty to the vets doing the certification. Current advice is not clear enough and is likely to create a complex and inconsistent system requiring that SHAs must accompany every product leaving a regulated production, processing, or distribution facility.

- Revise the rules on what inspection and verification must be done by an OV, and what can be done by an appropriately trained and supervised Certification Support Officer.

Only 100 CSOs have been recruited since the creation of the role more than three years ago. The use of CSOs is an entirely logical way to scale up the capacity to facilitate UK exporters of the lowest risk food categories, whilst ensuring there is supervision and control of our processes. It is incumbent on Government to provide the necessary confidence and reassurance that CSOs can play a meaningful role, without these businesses are not able to invest in the recruitment and training of people into these newly created positions.

We believe these three actions, alongside the successful conclusion of a zero-tariff trade agreement, are vital if UK Government is to avert a crisis for our meat, dairy and other POAO exporters. We are already at a very late stage and these businesses are suffering.

We urge you to act to ensure that crucial UK businesses, jobs and trade links can take place in 2021 and beyond.

Yours sincerely

UK Food and Logistics Industry Representatives (see list 29 organisations)

Copied to:

Rt Hon Michael Gove MP (Chancellor of the Duchy of Lancaster),
Victoria Prentis MP (Minister for Farming, Fisheries and Food)

JOINT LETTER FROM UK FOOD AND LOGISTICS INDUSTRY ON READINESS FOR FOOD EXPORTS

LIST OF SIGNATORIES (alphabetically by organisation)

David Camp
Chief Executive
Association of Labour Providers

Walter Anzer
Director General
British Food Importers and
Distributors Association

Richard Harrow
Chief Executive
British Frozen Food Federation

Nick Allen
Chief Executive
British Meat Processors
Association

Richard Griffiths
Chief Executive
British Poultry Council

Jim Winship
Director
British Sandwich and
Food-To-Go Association

Declan O'Brien
Director General British Specialist
Nutrition Association

Karin Goodburn
Director General
Chilled Food Association

Shane Brennan
Chief Executive
Cold Chain Federation

Parminder Kaur
Chair
Council for Responsible Nutrition
UK

Sarah Hendry
Director General
Country Land and Business
Association

Glyn Roberts
President
Farmers Union of Wales

James Bielby
Chief Executive
Federation of Wholesale
Distributors

Elsa Fairbanks
Director
Food and Drink Exporters
Association

Ian Wright
Chief Executive
Food and Drink Federation

Pete Robertson
Director
Food and Drink Federation
Cymru

Graham Keen
Executive Director
Health Food Manufacturers
Association

Neil Wilson
Executive Director
Institute of Auctioneers and
Appraisers in Scotland

JOINT LETTER FROM UK FOOD AND LOGISTICS INDUSTRY ON READINESS FOR FOOD EXPORTS

Katie Doherty
Chief Executive Officer
International Meat Traders
Association

Christopher Dodds,
Managing Director
Livestock Auctioneers
Association Limited

Neil Shand
Chief Executive
National Beef Association

Lynda Simmonds
Secretary General
National Edible Oils Association

Terry Jones
Director General
National Farmers Union England
& Wales

Dr Zoë Davies
Chief Executive
National Pig Association

Phil Stocker
Chief Executive
National Sheep Association

Michael Bellingham
Chief Executive
Pet Food Manufacturers
Association

Andrew Kuyk
Director General
Provision Trades Federation

Richard Burnett
Chief Executive
Road Haulage Association

Simon Cripps
Chairman
Seasoning and Spice Association