

BMPA (Supplementary) (ABR0051)

As you know, strictly speaking, trade with other EU member states are not treated as 'exports' but as intracommunity trade of goods in free circulation in the single market. Due to the nature of this trade within the single market, in practical terms, there is no specific mechanism for precisely recording the final destination of consignments within the EU. While generally a significant proportion of intracommunity trade is directly with the destination country and this will be apparent in the documentation, this is by no means always the case with some consignments being redistributed between member states or being partially processed (such as deboning or retail packing) before being transported on to another EU destination country. These factors can lead to some distortion of intracommunity trade data.

Furthermore, the EU has a list of non-EU 3rd countries and country regions permitted to import meat and meat products into the EU:

- Regulation (EU) No 206/2010 – Meat Product - Third countries, territories and parts thereof listed in Part 1 of Annex II to from which introduction into the Union of that category of fresh meat of the respective species is authorised as specified in that Part of that Annex.
- Commission Regulation (EC) No 798/2008 Poultry and poultry products - list of third countries, territories, zones or compartments from which poultry and poultry products may be imported into and transit through the Community and the veterinary certification requirements.

Obviously as an EU member the UK is not currently on these lists, but if by the time we leave, if the UK has not been added to both lists we would not be permitted to export meat to the EU. This is one of the things we are reliant on the EU27 agreeing and doing. We are concerned that the necessary changes to these bits of legislation will be overlooked in the negotiations. The UK will seek to sweep up all of the current EU requirements in the Great Repeal Bill, but what provisions are the EU making to ensure that the UK is added to all and any 3rd country lists that may be required? It is imperative that as well as understanding all the detail of what the UK needs to take care of, UK officials and ministers need to have a full understanding of all the changes needed in EU legislation ahead of Brexit D-Day and to remind the EU and make sure they make them.

22 March 2017