

Nephrops Product Journey

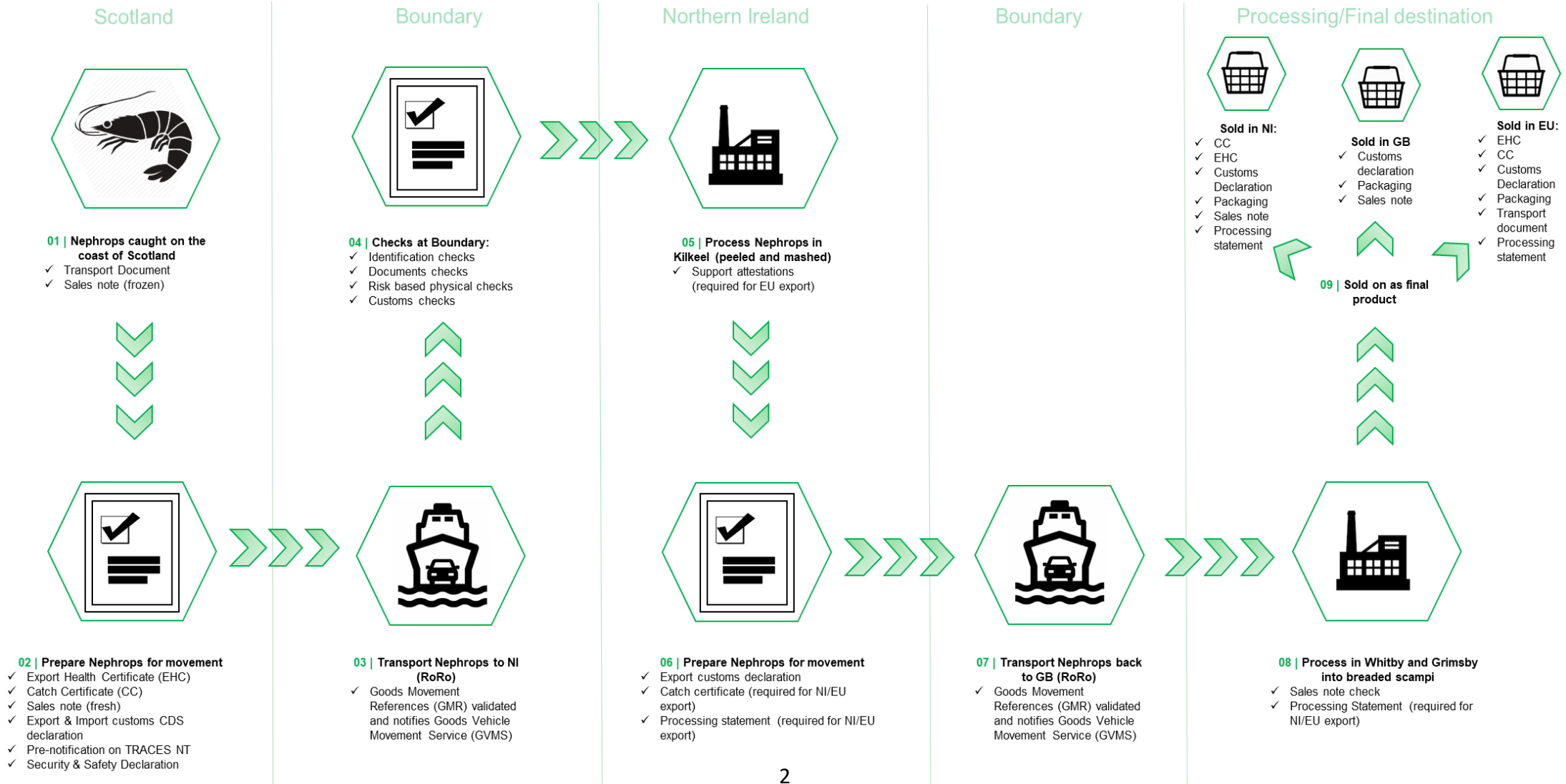
Introduction

This paper provides an overview of the movement of fresh and frozen Nephrops from Scotland, for processing in Northern Ireland before being transported back to Great Britain for either re-export or use on the domestic market.

The implementation of the Northern Ireland Protocol means that consignments of seafood moving from Great Britain to Northern Ireland will be required to meet the relevant Illegal, Unreported and Unregulated (IUU) fishing requirements (e.g. having a catch certificate) in addition to meeting the required Sanitary and Phytosanitary (SPS) requirements (including having a signed export health certificate, completing pre-notification and entering Northern Ireland at a designated point of entry (POE) which has approved facilities). In line with the Government's commitments on implementing the Protocol, we will streamline and simplify these controls to the maximum extent. The EU (Withdrawal Agreement) Act 2020 includes provision for the Government to define a qualifying status for goods and businesses in Northern Ireland benefitting from unfettered access for movements in the other direction (NI – GB).

The UK Government will shortly be announcing further Government support for agri-food traders moving goods from Great Britain to Northern Ireland.

Process overview



Requirements

Implementing the Northern Ireland Protocol will result in new requirements for exporters and regulating authorities of fresh and frozen prawns between Great Britain and Northern Ireland. The section below outlines the documentation that is anticipated to be required to facilitate the movement of fresh and frozen prawns between GB and NI.

Sales Note

Registered sellers must complete a Seller's Sales Note within 48hrs of the sale and submit it to the Fishery Office at the Port of Landing.

Fishers must record:

- the external identification number and the name of the fishing vessel that has landed the product concerned;
- the port and date of landing;
- the name of the fishing vessel's operator or master and, if different, the name of the seller;
- the name of the buyer and its VAT number, its tax identification number, or other unique identifier;
- the FAO alpha-3 code of each species and the relevant geographical area in which the catches were taken;
- the quantities of each species in kilograms in product weight, broken down by type of product presentation or, where appropriate, the number of individuals;
- for all products subject to marketing standards, as appropriate, the individual size or weight, grade, presentation and freshness;
- where appropriate, the destination of products withdrawn from the market for storage of fishery products in accordance with Article 30 of Regulation (EU) No 1379/2013;
- where appropriate, the quantities in kilograms expressed in net weight, or the number of individuals, below the applicable minimum conservation reference size, and the destination thereof;
- the place and the date of the sale;
- where possible, the reference number and date of invoice and, where appropriate, the sales contract;
- the price.

Transport Documentation

A transport document must accompany nephrops that are transported away from a Scottish port area where it landed up until the first sale. Exceptions are if:

- a copy of the landing declaration or equivalent document accompanies the fish
- an electronic transport document has been submitted
- a take-over declaration has been submitted (estimated weight)

- an under 10m catch record has been submitted and you then transport your own catch

A transport document contains the following information:

- place of destination of the consignment(s) and the identification of the transport vehicle;
- external identification number (PLN) and name of the fishing vessel(s) that have landed the fish;
- FAO alpha-3 code of each species and the relevant geographical area in which the catches were taken;
- quantities of each species transported in kilograms product weight, broken down by type of product presentation or, where appropriate, the number of individuals.
- name(s) and address(es) of the consignee(s) (Destination)
- place and date of loading
- quantities (where appropriate) in kilograms expressed in net weight, or the number of individuals, below the applicable minimum conservation reference size.

Logbooks

Logbook data provides Marine Scotland with a record of fishing operations provided by a master of a vessel. Logbook provide records of catch and effort registered at the time of the catch operation.

For logbooks the submission process is dependent on vessel size:

- Under 10m vessels – summary of landing information to be provided monthly.
- 10 - 12m vessels – fishers to complete logbook and submit a copy within 48hrs of landing.
- Over 12m vessels – fishers to complete logbook and submit electronically at least once per day, at the request of Marine Scotland, and after the last fishing operation has been completed and before entering port.

Landing/transhipment declaration

- Art 21 & 23, Control Regulation: 10 - 12m vessels are required to complete a landing/transhipment declaration within 48hrs of the activity to Marine Scotland.
- Art 22, Control Regulation: over 12m vessels are required to submit transhipment and/ or landing declarations within 24hrs electronically (of either the transhipment, or the landing taking place).

Labelling/Packaging requirements

Prawns sold prepacked must abide by labelling rules within the Food Information to Consumers Regulation 1169/2011. This requires that all prawns need to be labelled with:

- A name

- A list of ingredients
- A use-by or best before date
- Storage conditions
- The name and address of the business with responsibility for the labelling information
- Net quantity
- Instructions for use if their absence would make it difficult to use the product appropriately.
- Separate consumer information and traceability requirements apply under fisheries legislation (Regulation 1379/2013, Regulation 1224/2009 AND Regulation 404/2011).
- Traceability information

Catch Certificate (or relevant IUU documentation)

A catch certificate is a document that proves that fish have been caught legally. To export fish to NI after 1 Jan 2021, fishers/exporters from Scotland will need to complete a catch certificate using the online Fish Export Service¹.

A catch certificate includes key information on:

- Date - When fishing took place
- Location - Where fishing took place
- Weight - How much fish was caught

To create a catch certificate, the exporter/fisher must log onto the Fish Export Service using a Government Gateway user ID and password and

- a Government Gateway user ID and password
- the company name and address of the exporter
- the name of the person responsible for the export
- the species (or Food and Agriculture Organisation (FAO) code)
- it's state and its presentation
- the names or Port Letters and Numbers (PLNs) of the vessels that caught the species
- the landing dates for each species
- the export weights of each product
- to specify whose waters the species were caught in - the FAO area
- transport details for how the export will leave the UK and where it will leave from
- the identification numbers of the containers used to export the product (if applicable)

If the consignment has been sourced from more than one vessel, a multiple vessel schedule is submitted as part of the online Fish Export Service. No separate form is required.

A processing statement/storage document may be required if prawns were previously imported into GB from a non-UK flagged vessel, are processed/stored in GB, and then move to NI.

¹ <https://www.gov.uk/guidance/create-a-uk-catch-certificate>

Export Health Certificate and SPS requirements

An Export Health Certificate (EHC) is an official document that confirms an export of live animals or animal products meets the health requirements of the destination country.

EHCs are completed by an exporter and signed and stamped by an appropriately qualified Certifying Officer (CO).

Fishery products to be exported to the EU, or moved to Northern Ireland, will most likely be certified by a Local Authority Certifying Officer or Food Safety Officer acting in their capacity as a Food Competent Certifying Officer (FCCO).

All products in one consignment must fall within a single EHC category, share the same animal and public health status and is sent to a single destination.

Currently EHCs are not required for most animal product movements to NI. The Northern Ireland Protocol requires shipments of live animals, plants, and their products to meet the same Sanitary and Phytosanitary (SPS) standards held by the EU. In many cases, EHCs will therefore be required for trade between GB and NI.

EHC Online is a new digital online application service for EHCs that has been developed by Defra and APHA. Traders will need to register and familiarise themselves with the new platform.

EHCs contain the following information:

1. Identity – confirms the name of the exporter and quantity and weight of goods being shipped.
2. Shipping information – such as the container, seal number and boat details.
3. Health marks – for example the EU ‘oval mark’ confirms that the product meets EU food standards.
4. Country of origin – some certificates require proof that the product originated and was processed in certain countries.
5. Storage conditions – such as whether the product needs to be frozen to a certain temperature or kept separate from other goods.
6. Health statements

Exporters will have to:

- Visit EHC form finder² to search for the certificate they require along with the accompanying, ‘Notes for Guidance’. Only current EHC are available on EHC form finder.

² <https://www.gov.uk/export-health-certificates>

- The process for application is dependent on the certificate type. Nephrops will travel under “fishery products intended for human consumption to the EU and Northern Ireland: certificate 8270”³.
- The relevant EHC is either downloaded and filled in on PDF (along with the required Export Application form) and emailed to APHA, or EHC Online (ECHO) is used.
- It is recommended that the exporter chooses their certifying officer and contact their Local Authority Environmental Health Department to discuss certification and potential inspection requirements.
- If necessary, the Certifying Officer inspects the consignment, before completing certification.
- A hard copy of the signed Export Health Certificate then travels with the consignment to the Point of Entry in Northern Ireland, where it will be checked as part of the documentary check. Consignments may also be subject to identity and physical checks.
- Product must be dispatched from an approved establishment (Regulation 853/2004), listed for export purposes by the EU. The Certifying Officer must have evidence that the fishing vessels which were involved in catching the prawns within each consignment are registered as food business operators with their Local Authority and, where relevant, that the vessels have undergone a hygiene inspection.

Processing Statement

A processing statement is for fish and shellfish that have been imported or landed directly into the UK for processing, ready for export. This statement allows export of fishery products to NI or any other country if all or part of the product will return to the UK/ NI.

Details required to create a processing statement⁴ are:

- a Government Gateway user ID and password
- the company name and address of the exporter
- to say what is in the consignment (and include the EU tariff commodity codes)
- a health certificate number for the export
- the species, catch certificate number and total weight from each catch being used in the consignment
- the before and after processing weights of the export
- the name, address and plant approval number of the processing plant used (and the name of the person responsible for the consignment)

³ https://assets.publishing.service.gov.uk/media/5f8459618fa8f5044f333672/Draft-8270_English_V1.pdf

⁴ <https://www.gov.uk/guidance/create-a-uk-processing-statement>

Step 1: Nephrops caught on the coast of Scotland

Fresh and frozen Nephrops: Current Process	
1	Vessels fish for Nephrops
2	Logbook completed
	Complete landing/transshipment declaration
3	Catch is landed into port
4	Catch is graded
5	Complete transport document
6	Catch transported to factory
7	Catch is weighed
8	Sales note generated
9	Compliance measures are undertaken
10	Catch is boxed up

Step 2: Prepare Nephrops for movement

Frozen: Current Process for Vessel Master	
1	Nephrops enter cold store at the factory
2	Processing occurs using an individual quick-freezing line (IQF)
3	Tails are bagged and put into a bulk bag
4	The bagged tails are put onto a pallet and coded
5	Pallet document is completed
6	Pallet tag is applied
7	Pallet enters cold store
8	Kilkeel request consignment
9	Kilkeel send lorry to transport product to NI
10	Product is loaded onto lorry
11	IUU Documentation produced by GB Fisher
12	Invoice Kilkeel Seafoods
13	Consignment transported to Kilkeel Factory via Cairnryan

Fresh:
Current Process for Vessel Master

1	Transport product to processing plant in Ayr
2	Undertake quality control measures
3	Catch is graded
4	Catch is weighed
5	Apply traceability value to each catch from each vessel
6	Email Kilkeel a catch summary
7	Package up product for transport
8	Takes other product (white fish) from NE and then travels to Ayr factory
9	Truck arrives at Ayr factory
10	Truck travels from Ayr factory to Cairnryan
11	Truck goes on the ferry from Stranraer to Larne
12	Lorry arrives at Kilkeel Factory

Step 3: Transport Nephrops to NI (RoRo)

1. Importers responsibility to have correct documentation. Importers must communicate with exporters to receive necessary information to complete checks in time.
 2. Physical copy of EHC must be in lorry with consignment. Checked at Point of Entry.
 3. The importer/agent on behalf of importer will lodge pre-notification with Larne Port or Belfast Port by completing a Common Health Entry Document (CHED). The importer must have registered office in importing country to access system.
 4. Catch certificates must be submitted electronically (emailed) to authorities by the importer or physically available at the boundary. A multi-schedule catch certificate can be used for a consignment comprising of multiple landings. Min 72hrs notice required.
 5. Pre-lodgement: Ferry operators validate GMRs (Goods Movement Reference) and notify GVMS (Good Vehicle Movement Service). GVMS also has MRN from customs systems and safety & security declarations (completed prior to lorry arrival at port of departure.)
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Step 4: Checks at Boundary

Entry of fresh and frozen Nephrops will need to be via a designated point of entry, for products of animal origin. For this product journey, the point of entry into Northern Ireland will be Larne and Belfast.

1. On arrival the consignment must be presented to the Point of Entry (POE) without delay and it will be subject to documentary, identity checks and possibly a physical examination.
2. The consignments presented for import must be accompanied by the original health certificate(s). The POE will retain the original health certification.
3. POE need to link documentation to consignment. There are certain labelling requirements outlined in the control regulation. There will also be further labelling requirements in EU law applicable to NI if those goods are for sale in NI or EU. Labelling guidance is available on gov.uk: <https://www.gov.uk/government/publications/how-to-trace-weigh-and-distribute-fish-products/traceability-and-labelling-information#who-does-traceability-apply-to>
4. Every consignment of fresh/frozen prawns can be expected to undergo documentary and identify checks from the 1st of Jan 2020 at Larne and Belfast.
5. The consignment will not be permitted to leave the POE, except with a CHED provided by the POE confirming that all the health checks have been carried out.
6. The products must be taken directly to the place of destination, which must be the address given on the CHED. The CHED must accompany the consignment to the first point of destination, in this case the Processing Factory at Kilkeel.

Step 5: Process Nephrops in Kilkeel (peeled and mashed)

1. Subject to official controls at plant, e.g. inspections.
 2. Legal traceability requirements. Additional requirements based on country of export (e.g. labelling requirements, country of origin).
 - a. Support attestations if products have onward travel to EU.
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Step 6: Prepare Nephrops for movement for GB

Customs Processes

Trade going from Northern Ireland to the rest of the UK should take place as it does now. There should be no additional process or paperwork and there will be no restrictions on Northern Irish qualifying goods arriving in the rest of the UK - that is, there will be unfettered access, as provided for by the Protocol. There are some exceptions to this approach where international obligations require for checks to exist (i.e. CITES etc)

Processed prawns that are being exported back to the UK domestic market must meet the requirements of Northern Ireland Qualifying Goods if applicable.

Catch Certificates

No catch certificate required if the final destination is within the United Kingdom. If the product will be exported to the EU, then for export a Catch Certificate will be required.

Processing Statement and Storage Documentation

As there should be no additional process or paperwork and there will be no restrictions on Northern Irish qualifying goods arriving in the rest of the UK, no processing statement or storage documentation required. If goods are sold or moved to NI or EU, this may be required.

Step 7: Transport Nephrops back to GB (RoRo)

Step 8: Process in Whitby and Grimsby into breaded scampi

See sales note and processing statement requirements (if applicable)

Step 9: Sold on as final product

	If product is moved to NI	If product is exported to EU	If product is sold in GB
Catch Certificates	Fishers/exporters from GB will need to complete a catch certificate using the online Fish Export Service	As on left.	Art 58 of the Control Regulation (1224/2009) provides that all lots of fisheries and aquaculture products should be traceable at all stages of production, processing and distribution, from catching or harvesting to retail stage. This is in addition to articles 66-68 of 404/2011. At point of sale, goods should be labelled according to the CMO regulation (retained version).
Export Health Certificates	Exporters need an EHC obtained via EHCO. Fishery products will need to be dispatched from an UK approved food establishment that have been listed.	As on left.	N/A
Customs Process	There will be a series of common requirements that will apply to typical movements of agri-food products from Great Britain to Northern Ireland from 1 Jan 2021 (subject to the outcome of discussions about the process and frequency of controls). The Trader Support Service is live for businesses and is designed to provide education and guidance for traders moving goods under the Northern Ireland	Exporters need to adhere to relevant customs formalities when exporting goods to the EU.	As a registered seller of fish, you must <ul style="list-style-type: none"> • ensure fish is weighed prior to first sale and maintain appropriate records. • ensure fish is weighed prior to first sale and maintain appropriate records. • keep a record of each sale of fish for three years. • make records available for inspection at the notified location.

	Protocol, including between Great Britain and Northern Ireland. This service will provide a free end-to-end support package to manage import and safety and security declarations on behalf of traders.		<ul style="list-style-type: none"> complete and submit a sales note to the competent authority for each transaction. submit sales notes electronically (e-Sales) where turnover exceeds 200k euros.
Packaging	Prawns sold prepacked must abide by labelling rules within the Food Information to Consumers Regulation 1169/2011	As on left.	Prawns sold prepacked must abide by labelling rules within the Food Information to Consumers Regulation 1169/2011
Transport document/ Sales note	If you transport fish that has already been sold, you must be able to prove a sales transaction has taken place with a sales note. This occurs on the first sale of original catch.	<p>If you transport fish from the UK to a country in the EU, you must submit a transport document to the MMO, you must also send a copy of the transport document within 48hrs of loading to the relevant authorities in the EU country where the first sale takes place.</p> <p>If you transport fish outside of the UK for sale or storage in an EU member state (other than France or Belgium) you must:</p> <ul style="list-style-type: none"> use the weight of the fish weighed at the point of landing; this may be either: the minimum quantity of the total catch in accordance with the UK's sampling plan prior to transport to a registered EU auction; or the weight of all of the fish. <p>If the fish is being transported out of the EU, then the fish must be fully weighed, and this weight used in the transport document.</p>	If you transport fish that has already been sold, you must be able to prove a sales transaction has taken place with a sales note. This occurs on the first sale of original catch.

Processing Statement	A processing statement allows export of fishery products to NI or any other country if all or part of the product will return to the UK/ NI.	Processing Statement required.	N/A
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