

By email

The Rt Hon Michael Gove MP
Chancellor of the Duchy of Lancaster, Minister for the Cabinet Office
Cabinet Office
70 Whitehall
London
SW1A 2AS

8th February 2021

Dear Minister,

I am writing to you with regards to the current implementation of the EU-UK Trade and Co-operation Agreement (TCA) and the specific problems British animal feed sector businesses are having in exporting feed materials and finished feeds to the EU and Northern Ireland. After a month of trying to achieve technical solutions to the export problems faced by feed businesses, it is clear that this issue cannot be resolved without political intervention.

The AIC (Agricultural Industries Confederation) represents the £9 billion UK Agri-supply industry. Our members supply farmers with the key inputs and advice they require to produce crops and rear livestock. This includes the supply of livestock feed, fertiliser, crop protection products, seeds as well as the marketing of cereals and oilseeds to customers in both the UK and EU.

In preparation for EU exit, UK manufacturers and supplier of feeds and feed materials were assured that Export Health Certificates (EHCs) would not be required on exports of feeds and feed materials containing no animal products to the EU or Northern Ireland. After a month of the TCA, this is not the case. Our members, ranging from multinational businesses to SMEs, have found no way of practically exporting such feeds to the EU and Northern Ireland. In trying to export these feeds and materials, importing nations in the EU have provided a number of barriers to entry, such as demanding completed EHCs, phytosanitary certificates, entry into TRACES NT and veterinary checks at BCPs, all of which are not required under the Regulation (EC) No 1069/2009 which is not applicable for feeds containing no animal products. Such feeds are consequently not under the scope of the Commission Regulation (EU) No 142/2011.

Problems have been particularly challenging for feeds containing animal by products such as milk and milk derived products, gelatine and collagen, hydrolysed proteins, eggs, dicalcium phosphate, chondroitin and glucosamine. The requirement to complete EHCs for feeds containing these products is particularly challenging as suitable EHCs do not exist and GB suppliers are not listed on EU approved establishment lists to supply such feeds into the EU.

It is very troubling that each EU Member State has different procedures for importing feeds from GB, leaving British businesses at a loss in how to proceed. We have raised this issue frequently in the last month with Defra and APHA colleagues, however we have not been given any clear guidance on how to resolve this.

As I am sure you can appreciate, this is a critical issue affecting GB based businesses who are now actively losing export business to EU competitors or seeking to bypass the UK in their supply chains. I ask that you raise this issue with the European Commission as a matter of urgency in order to achieve the clarification and certainty that our feed member businesses require.

In order to achieve this, I would greatly welcome the opportunity to 'virtually' meet with you to discuss this, alongside AIC businesses in the feed sector who are currently unable to export.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R Sheasby'. The signature is fluid and cursive, with the first name 'Robert' and the last name 'Sheasby' clearly distinguishable.

Robert Sheasby
Chief Executive