

DAERA Guidance for the Collection and Movement of SPS Goods from Great Britain to Northern Ireland through Groupage



Sustainability at the heart of a living, working, active landscape valued by everyone.

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1. INTRODUCTION

DAERA and DEFRA have worked with industry to assist them in the development of new processes to aid the movement of mixed consignments (groupage) of Sanitary and Phytosanitary (SPS) products from Great Britain (GB) to Northern Ireland (NI). SPS goods include:

- Products of animal Origin (POAO);
- Plants and Plant Products;
- Food and Feed of non-animal products; and
- High Risk Food of non-animal origin (HRFNAO).

Groupage, within this document, is defined as, the commercial haulage of multiple consignments within a single sealed container or trailer. This usually involves a single vehicle collecting multiple distinct consignments from a range of suppliers at a number of locations in GB. Upon arrival in Northern Ireland, these consignments may be destined for either a single or multiple locations. Throughout this guidance, the terms consignment and pallet are used interchangeably as, in practice, most groupage consignments are moved on pallets. Wooden pallets, if used, must be ISPN compliant.

DAERA recognises that moving SPS goods via groupage from GB to NI presents industry with a number of logistical challenges including multiple and varied collection points; uncertainty around timing of collections; and the requirement to co-ordinate collection times to coincide with the availability of a Certifying Officer (CO) to provide the requisite certification and seal the container or trailer. To help mitigate these challenges, DAERA, in conjunction with DEFRA and industry have developed three separate delivery models (Linear, Consolidation Hub & Hybrid).

This guidance provides an overview of the documentary, identity and physical checks required on all SPS eligible goods and sets out details of each of the delivery models for groupage. It also contains practical advice on the steps that can be taken to ensure compliance and helpful tips for sealing and loading groupage consignments. Following this guidance will help to ensure that DAERA can complete the requisite SPS checks on groupage consignments as quickly as possible, thereby minimising the risk of delay at NI Points of Entry (POEs). **However, it does not negate the need for consignments to be presented at the NI POE for an identity inspection, or a risk based physical inspection should they be selected.**

For all groupage consignments and regardless of the model used, DAERA may request importers/hauliers to provide GPS data for auditing purposes.

2. OVERVIEW OF CHECKS REQUIRED ON SPS ELIGIBLE GOODS

There are three checks involved in the SPS approval journey for all eligible goods moving from GB – NI:

- **Documentary** – Remote electronic examination of official certificates, attestations and commercial documents accompanying consignments. It is likely that within a mixed groupage load, multiple certificates will be required, e.g. Export Health certificate for Products of Animal Origin (POAO), Phytosanitary Certificates for Plant Products, Catch Certificates for fish and fishery products, Certificate of Inspection (COI) for Organic Products.
- **Identity** – Visual inspection of the consignment to verify that contents correspond with details provided on the accompanying documentation. This may be completed through the inspection of an officially applied seal and correlation with accompanying certification.
- **Physical** – Physical check on goods to ensure they comply with SPS requirements. These are completed on a risk basis and may include as appropriate checks on the consignment’s packaging, labelling, temperature, laboratory and diagnostic tests.

2.1 Sealing of Consignments

All groupage models work on the premise of official sealing and certification of the consignment at ‘pallet(s) level’.

In order to obtain an Export Health Certificate (EHC) most agri-food products do not require an official seal. However, sealing of a consignment under official supervision (i.e. by a CO) is the fundamental principle underpinning the movement of SPS eligible goods through groupage. Without an officially applied seal, all such consignments would require a full identity inspection upon entry to NI, which would inevitably lead to delays at POE. Guidance on sealing techniques and acceptable seals are set in detail on page 9-15.

3. GROUPAGE MODELS

DAERA and DEFRA in conjunction with industry have developed three groupage models for the commercial haulage of multiple consignments of SPS goods from GB to NI. They are:

- The linear model;
- The consolidation hub model; and
- The hybrid model.

3.1 Linear Model

The linear model, illustrated below, works on the individual and sequential collection of officially sealed consignments from multiple locations in GB. In advance of collection, each individual consignment must be sealed (and certified) under official supervision, i.e. by a CO.

Linear Model SPS Journey.

Individual consignments/pallets must be securely sealed under official supervision. (Examples of best practice in relation to sealing are illustrated on page 9).

For all product lines within the consignment an Official Certificate/attestation must be completed by a CO and the Seal Number(s) of the consignment/pallet must be entered on relevant EHC and Common Health Entry Document (CHED).

Creation of a CHED on TRACES NT.

General guidance for completion of CHEDs can be accessed at:

<https://www.daera-ni.gov.uk/articles/pre-notification-arrival-consignments-northern-ireland-point-entry-gb>.

The CHED should be created by the person responsible for import of the consignment. Although not mandatory, in order to minimise the risk of documentary discrepancies (and subsequent risk of delays at NI POE), DAERA recommends that for groupage consignments this step should be completed by the haulier/agent responsible for the entire collection.

When creating a CHED(s) for groupage consignments please ensure that the following information is recorded:

- **Box 1.3** - Local reference – Enter Groupage.
- **Box 1.10** - Prior Notification – Enter Estimated time of arrival in NI Port.
- **Box 1.13** - Enter Trailer Number.
- **Box 1.17** - Enter Trailer Number and all relevant official and commercial seal numbers. Please enter commercial haulier seal (see below) in the first line followed by individual official pallet seals in subsequent lines.

Although not essential, it would be helpful to provide DAERA with photograph(s) of the consignment/pallet at loading by emailing them to: DAERAgroupage@daera-ni.gov.uk.

After final collection, the haulier must apply a commercial seal to the trailer. Details of the commercial seal must be added to the CHED as outlined above.

Submission of Manifest to DAERA

Post final collection, the haulier/agent must email the manifest for the entire load to DAERA at DAERAgroupage@daera-ni.gov.uk. The manifest must include CHED number(s) and Pallet Seal number(s) against each individual collection point of the journey.

On arrival at the NI POE, the haulier must report to the DAERA Inspection facility for completion of identity check. When all checks have been satisfactorily completed, DAERA will clear the consignment for entry into NI.

3.2 Consolidation Hub Model

In general, a consolidation hub allows a range of products to be consolidated at a single approved establishment prior to collection and onward movement to NI.

From a groupage perspective, consolidation hub operations present a number of logistical scenarios/options that may be deployed. As highlighted below, the circumstances at each needs to be considered individually to ensure the appropriate certification and sealing requirements are delivered upon.

(i) Does the consignment arrive at the Hub sealed and certified?

Consolidation hubs may or may not receive consignments already sealed and certified. For those consignments arriving at the hub which are neither sealed nor certified, the presence of a CO on site is essential. The CO may require additional information/attestations to provide the assurances necessary for certification.

(ii) Should the official seal be completed at pallet level or trailer level?

If the CO (or an official acting under his/her supervision) is able to apply an official seal to the trailer upon completion of certification and loading, sealing at individual pallet level will not be required and DAERA authorised officials will be able to complete an identity check at the GB Port of Departure. This should therefore remove the requirement for an identity check at NI POE.

If application of an official seal to the trailer by the CO (or an official acting under his/her supervision) is not possible, each individual pallet will need to be officially sealed and certified in the same way as outlined for the linear model, above. A commercial haulier seal must then be applied to the trailer on completion of loading.

Creation of CHED on TRACES NT.

CHEDs must be created in the same way as outlined for the linear model. The consignor on the CHED should be the premises at which official sealing and certification is completed, and reflect what has been entered on the EHC, i.e. Premises of Origin or Consolidation Hub.

Official Seal numbers must be included on all relevant EHCs and CHEDs. The commercial haulier seal details, if applicable, must also be entered on the CHED.

Submission of Manifest to DAERA

The Haulier manifest must be submitted to: DAERAgroupage@daera-ni.gov.uk similar to that described for the linear model.

A Consolidation Hub manifest will also be required for those consignments arriving at the Hub pre-sealed and certified, to reflect the origin of the consignment if this information is not included in the haulier manifest.

3.3 Hybrid Model

The linear and consolidation hub models are not exclusive and may be used in conjunction with each other. The general principles around sealing and certification outlined in both the linear and consolidation hub models remain. To illustrate this, an example of a hybrid journey has been set out below.

In this example, a number of pallets, which have already been officially sealed & certified, are collected from a consolidation hub as part of a linear collection journey. In this case, the consignment should be loaded in a similar manner to any individual collection within the linear model.

Assuming the inability to apply an official seal, the haulier must apply a commercial seal post the final collection on the journey.

Creation of CHED on TRACES NT.

CHEDs must be created for these consignments in the same way as outlined for the linear model. The consignor on the CHED must be the premises at which official sealing and certification is completed and reflect that which has been entered on the EHC, i.e. Premises of Origin or Consolidation Hub.

Official Seal numbers must be included on all relevant EHCs and CHEDs. The commercial haulier seal details, if applicable, should also be entered on all CHEDs.

Submission of Manifest to DAERA

The Haulier manifest must be submitted to: DAERAgroupage@daera-ni.gov.uk in similar to that described for the linear model.

Consolidation Hub manifest will also be required for those consignments arriving at the Hub pre-sealed and certified, to reflect the origin of the consignment/pallet if this information is not included in the haulier manifest.

4. SEALING AND LOADING OF CONSIGNMENTS FOR GROUPAGE

Seals

All official seals applied to consignments for groupage must be tamper proof.

- The number on the seal must correspond with the seal number entered on accompanying certification/attestations/documentation.
- Whilst the method of sealing used by a trader is a commercial decision, DAERA recommends that sealing methods should be discussed and agreed with your CO in advance. The photo-guide below has been compiled to illustrate what is, and is not, acceptable to DAERA however it is not an endorsement of any particular brand.

4.1 Acceptable tamper proof seals:

Below are examples of acceptable sealing techniques. Please note that this is not an exhaustive list and other forms of sealing are acceptable provided the requirements set out above are met.



A cardboard outer, wrapped in plastic, black strapping and a plastic seal applied on each strapping:



Plastic snap on pallet seals attached to the strapping which shatter if tampered with:



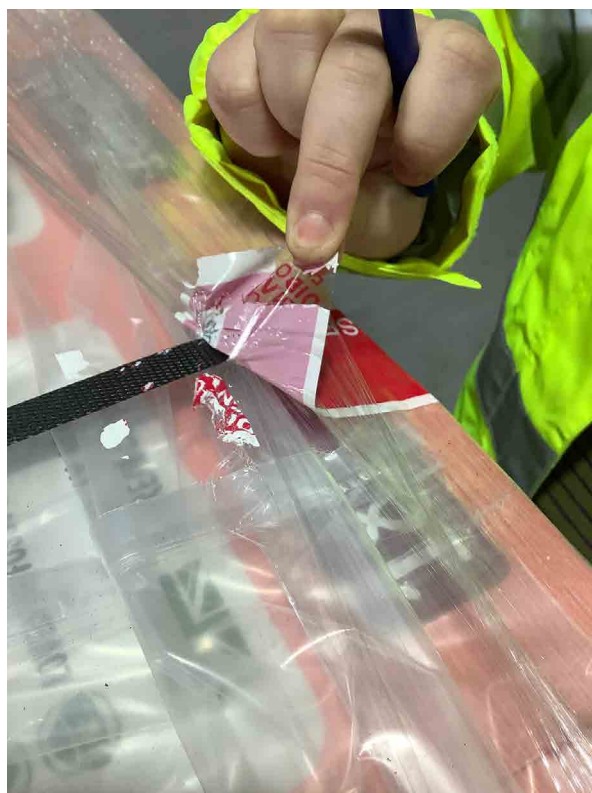
- ✓ **A strap lock seal which attaches to the strapping:**



- ✓ **A sticky label which is applied over the strapping and deposits an indelible dye/residue on the consignment if removed. Whilst the picture below is acceptable, please ensure that a seal is either attached to both straps or the cross-over point of the straps.**



- ✓ Adhesive seal labels that leave an indelible mark on the consignment if tampered with are acceptable. Again, seals must either be attached to each individual strap or span the cross over point if applicable. Careful attention must be given to the application of tape seals over plastic wrapping.



- ✓ Adhesive seal applied over strapping and all surrounded by plastic wrap. The seal must be of sufficient size and adhesiveness to prevent accidental removal and display evidence of tampering.



- ✓ **The following seals are acceptable for use in groupage consignments of germplasm.**



4.2 Unacceptable seals

The following seals are not acceptable to DAERA. If they are used, a full identity inspection will be required at the NI POE.

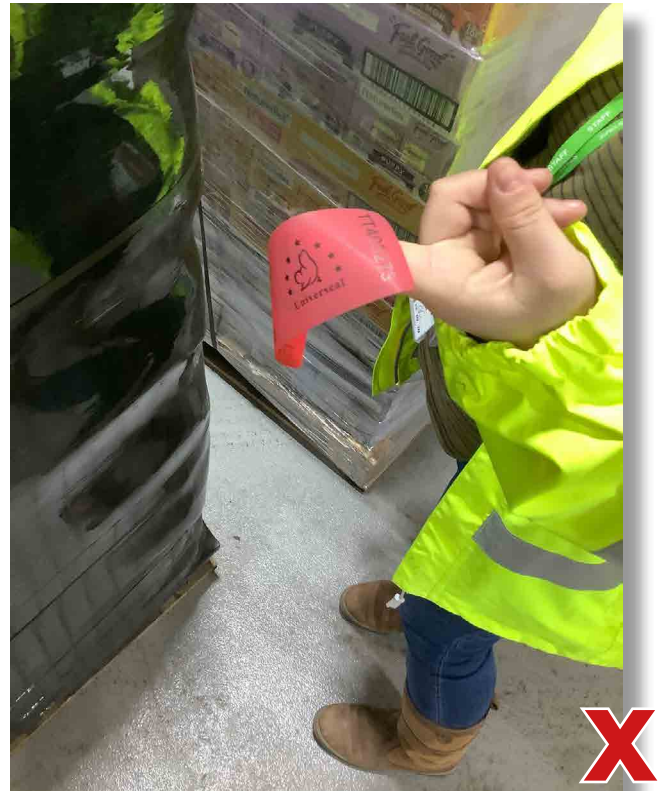
- ✗ **These seals are not tamper-proof. Therefore, regardless of whether they are attached to strapping or taped, they are not acceptable as they could be easily removed and reattached.**



X 4.2 Unacceptable seals (continued)



X These adhesive red labels peel off easily and could be removed and reapplied without leaving a residue/indelible mark. Therefore they are not acceptable as a tamper proof seal.



Although not essential, the use of transparent wrapping will aid any additional identity checks that may be required.

4.3 Loading of consignments

As well as ensuring consignments are correctly sealed it is important that care is taken to demarcate mixed loads. The pictures below illustrate good demarcation practice:



In the example below several well-sealed and demarcated consignments are mixed with non-SPS goods. To facilitate completion of identity checks and minimal handling of product, it is recommended that seals are displayed on the outward facing side of the consignment.



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