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for Environment
Food & Rural Affairs

Updated guidance on triangular trade of products of animal origin into the EU and Northern Ireland

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In March, Defra issued updated Notes for Guidance and guidance to traders with additional information in relation to triangular trade. Triangular trade is when a product is imported from one country into Great Britain and then re-exported to another.

This guidance articulates the EU's current interpretation of the rules around this type of movement, given the risk of refusal of consignments at EU Border Control Posts (BCPs).

The UK is seeking to raise this issue at the Trade and Cooperation Agreement's SPS Trade Specialised Committee for an explanation of how this interpretation is consistent with obligations under the TCA.

The guidance applies to exports to the EU from GB, but does not apply to movements to Northern Ireland from GB, which are covered separately at the end of this document.

The aim of this document is to reiterate the previously outlined position on GB-EU trade, and provide further clarity in relation to GB-NI trade.

The triangular trade resolution means that Rest of World origin POAO movements on the EU-GB-NI route can continue in the immediate term, however goods cannot then enter the European Single Market.

EU Trade

The guidance shows the EU's position that conditions apply to two specific types of triangular trade involving POAO:

1. To re-export Rest of World origin POAO that has been imported into GB, the product must undergo further processing unless the EHC does not require animal health attestations.

This means that POAO from outside of the EU, for example New Zealand lamb, cannot be re-exported to the EU unless it has been subject to a process as defined in the Notes for Guidance – such as heating, drying, marinating, etc. New Zealand origin lamb could be processed into meat preparation or meat product in GB (e.g. cooked lamb) and re-exported to the EU.



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A small number of EU EHCs contain no animal health attestations – for example honey. These products, if they originated in the Rest of the World, can be re-exported without further processing in GB.

This does not affect your ability to use Rest of World origin POAO in the production of an entirely new composite product in GB. For example, putting cooked chicken imported from Thailand into a chicken pie produced in GB.

2. To re-export EU origin POAO that has been imported into GB the product must either undergo further processing, or it must have undergone no other handling beyond unloading, storage, reloading and transporting.

This means product that has been taken out of its original packaging and subject to a process which does not meet the definition of further processing in the Notes for Guidance (such as slicing and/or re-packaging) cannot be re-exported.

EU origin POAO can be imported into GB and processed into a new product. For example, Danish pork cured in GB to become bacon can be re-exported using the Meat Product EHC (8384). EU origin POAO that remains in its original packaging can be re-exported using [the re-export EHC \(8461\)](#).

Processing is generally defined as any process that substantially alters the initial product including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of these processes.

Further information on specific commodities impacted are available in the Notes for Guidance.

Northern Ireland

The movement of EU or Rest of World origin POAO from GB to Northern Ireland can continue as it has done since 1 January 2021, under the existing 'standstill' arrangement (announced on 10th September 2021). Any changes to this arrangement will be subject to a reasonable notice period to allow businesses time to prepare.

This means that EU origin POAO can enter GB and then move to Northern Ireland. It does not need to undergo further processing, nor is the product subject to restrictions on handling beyond unloading, storage, reloading and transporting. EU product is frequently brought into GB, sliced and repackaged, and then moved to NI. This trade remains permissible. EU or NI origin fresh meat can continue to move to [NI using the P&R EHC for EU origin fresh meat](#).

RoW origin POAO can enter GB and then move to Northern Ireland, provided that the product could have been properly certified into NI directly. Any movements direct from the RoW origin country to NI that are not permitted **cannot** take place via GB instead. For example, New Zealand Lamb not subject to processing in GB can continue to move to Northern Ireland using [EHC 8369](#); cooked chicken from Thailand (i.e. a meat product) not subject to processing in GB can continue to move to Northern Ireland using [EHC 8384](#).



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Authorised Traders can continue to do these movements under STAMNI, although the above conditions still apply. RoW POAO being imported to GB and then moved to NI under STAMNI must have been properly certifiable into NI directly. EU origin POAO imported into GB and not subject to further processing, but rather slicing or re-packaging in GB, can also continue to move to NI under STAMNI. Any RoW origin goods that do not meet EU regulations and therefore cannot be certified into NI directly remain prohibited. STAMNI remains a derogation from certification requirements only; it is not a regulatory easement.

Kind regards

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