

## **Submission from Antrim and Newtownabbey Borough Council to the Committee for the Executive Office**

**22 October 2020**

### **Re: EU Exit and the NI Protocol: Implications for the Council**

1. The impact of BREXIT at district council level will be greater for those Councils with a Border Control Post (BCP). For Antrim and Newtownabbey Borough Council, a total of 12 businesses which the Council is responsible for will be affected, with many more potentially affected indirectly if imported foods are impacted.
2. DAERA has initiated a transition programme which by its nature is complex and includes a number of delivery partners; local Councils, DEFRA and the FSA all working to prepare for delivery of the new control regime on the 1<sup>st</sup> January 2021. We are awaiting details of the new control regime so that businesses are clear about what is expected of them.
3. It is anticipated that Support Health Attestation documentation may be required for products being exported from Northern Ireland (NI) to Great Britain (GB) for subsequent export into the EU. This Attestation documentation will be required by the certifying officers in GB in order for them to be able to issue Export Health Certificates (EHCs).

DAERA is the lead authority for exports from Northern Ireland, however, it is anticipated that due to the volumes involved, the Department may request support from the Councils' Environmental Health Officers who are Food Competent Certification Officers (FCCO). This support is likely to be requested to provide Support Health Attestations, for premises in which the Council is the enforcement authority. Should the Council be asked to provide this service, consideration will need to be given to the resource implications and funding arrangements.

4. The completion of Support Health Attestations to allow food produced by businesses in the Borough to be exported from GB to the EU. It is essential therefore that the costs incurred by the Council are fully funded through cost recovery or government grants. Considering the high degree of uncertainty at this stage, it is essential that the funding is flexible and kept under review so that it can be increased if actual costs exceed current estimates. It is not possible, at this point to estimate what these costs will be as it involves additional requirements including monthly inspections, and increased sampling for those businesses which are planning to export through GB to the EU. Clarity is required about the longer term funding of this work.

5. It is anticipated that on 1st January 2021 arrangements will not be in place to fully comply with EU legislation. Clarity is required on the contingency arrangements, to ensure that trade is not adversely affected and avoid unnecessary delays at the point of export. For example, food labelling changes and changes to packaging may not be in place as these issues are still subject to negotiation.
6. The Council, has been and continues to support businesses in providing information about how the new regime is likely to affect them. This includes providing advice on food labelling, such as the changes relating to the identification mark applied to Product of Animal Origin (POAO), once the new UK mark is agreed.
7. It is possible that some manufacturers in GB may no longer consider the NI market to be viable due to increased administrative burdens and possible tariffs and the impact of this could be a reduction of products available in the shops.
8. Clarity is still required and being sought on some other labelling requirements which are subject to the negotiation process such as if a food businesses address in Northern Ireland meets the requirement of EU of labelling the food with an EU address.