

SC COM(2025)553 Proposal for a Regulation amending Regulation (EU) No 1308/2013 as regards the EU school scheme, sectoral interventions, protein sector, hemp requirements, marketing standards, import duties, crisis supply rules and securities

1. Of relevant goods moving from GB to NI, what volume does not use the Northern Ireland Retail Movement Scheme (compared with the volume which does use the scheme)?

DAERA does not hold data on the volume of goods moving from GB to NI outside of the Northern Ireland Retail Movement Scheme (NIRMS), but we do have information on the number of times the relevant commodity code appears on a CHED (Common Health Entry Document).

The number of consignments of products affected by any new marketing standards moving from GB to NI outside of NIRMS for an average month are approximately:

CN code	Description	No. of consignments
0713	Dried leguminous vegetables, shelled, whether or not skinned or split:	1
1201 90 00	Soya beans, whether or not broken, other than seed	0
1202 41 00	Groundnuts, not roasted or otherwise cooked, in shell, other than seed	3
1202 42 00	Ground-nuts, not roasted or otherwise cooked, shelled, whether or not broken, other than seed	1
1209 29 45	Vetch seed, other than for sowing	0
1209 29 50	Lupine seed, other than for sowing	0
0201	Meat of bovine animals, fresh or chilled	143
0202	Meat of bovine animals, frozen	37
0406	Cheese and curd	864
0203	Meat of domestic swine, fresh, chilled, or frozen	113
0204	Meat of sheep or goats, fresh, chilled or frozen	14
0210 99 21	Meat of sheep and goats, with bone in, salted, in brine, dried or smoked	0
0210 99 29	Meat of sheep and goats, boneless, salted, in brine, dried or smoked	0
TOTAL		1176

Therefore, the largest number of consignments would be cheese and curd, representing nearly three quarters of the total. Followed by beef and pigmeat making up the vast bulk of the remaining quarter. There would only be a handful of sheepmeat/goatmeat and protein crop consignments.

We do not have the comparative data for those products moved under NIRMS, which would be retail products already packaged and ready for sale to the final consumer. Consignments moved under NIRMS use a specific NIRMS commodity code, with a single CHED covering the hundreds of product lines in that consignment. There are packing lists, with all the products listed, attached to each CHED, but the system does not record this data individually. However, it is likely that a significant proportion of NIRMS consignments contain the relevant goods.

Regarding meat-related terms, there is no specific commodity code linked to meat-alternative vegan or vegetarian products (as their composition and ingredients could vary). However, officials would expect that the majority of such products would be moved under NIRMS.

2. Of relevant goods produced in NI, what volume is sold exclusively in the NI and/or GB market(s) (compared with the volume also sold in the EU market)?

DAERA does not record export data by volume, but rather by value of export sales. For the most recent year published (2022), the destination and value of NI agricultural produce that we have available shows that:

- For milk and milk products (of which some proportion will be for cheese production), NI/GB sales accounted for 47% and the EU (and the Rest of the World) 53% (of the total of over 1.5 billion pounds in sales).
- For beef and sheepmeat, NI/GB accounted for 81.4% and the EU 17.1% (of the total of over 1.7 billion pounds in sales).
- For pigmeat, the EU accounted for 10.6% and NI for 16.6% (of the total of over 528 million pounds in sales). Individual data for GB and Rest of World sales is not available but combined they represent 72.8% of sales.

It should be noted that some data is suppressed to avoid disclosure (e.g. trade data of individual businesses).

DAERA does not hold data on the export of goatmeat or protein crops, as these would be negligible (if any is exported). DAERA also doesn't collect data on NI food producers producing and selling meat-alternative vegan or vegetarian products.

3. How many businesses based in, or selling into, NI may be impacted by labelling changes if the proposed EU act were to apply?

The local agri-food sector is heavily weighted towards beef and milk production, which combined make up over half of the agricultural sector's gross output. In terms of farm numbers, in 2024 there were 20,652 cattle and sheep farms, 2514 dairy farms, and 140 pig farms. Protein crops are supported by the Department's pilot Protein Crop Scheme, mainly spring field beans and spring peas, but these would make up only between one and two percent of the total agricultural cropped area. The farming of goats is relatively niche here and, when they are farmed, it's primarily for milk production.

DAERA does not hold records for how many external processing companies that could potentially be impacted selling into Northern Ireland. For those companies based in NI with total sales in excess of £250k, officials estimate there are 72 firms across the beef and sheepmeat, milk and milk product, and pigmeat sectors that purchase processing inputs from the GB market that could be impacted. However, these purchases do not

necessarily mean the primary meat product and can include capital machinery and other inputs.

Other local processors may use some primary products subject to new marketing standards. Businesses must be approved by the Food Standards Agency or District Councils to handle, prepare or produce products of animal origin. The latest data shows that there were 76 premises approved to process beef and/or sheepmeat, 32 approved for milk and dairy products, and 70 approved for pigmeat. However, these are not necessarily 178 individual businesses, as an establishment can be approved to process more than one type of product of animal origin.

It should be noted that the producers and processors of the new products subject to marketing standards would potentially be impacted by labelling changes only if any of the new marketing standards have labelling implications. They would, however, be subject to any other new marketing standards requirements.

In relation to the meat-related terms, DAERA doesn't collect data on NI food producers producing and selling meat-alternative vegan or vegetarian products (as they are not agricultural products themselves). We are anecdotally aware of some producers, but we're not currently aware of any products being sold that would not comply with the proposals.

4. What are the estimated costs of the labelling changes? Do relevant businesses update labels periodically? If so, might this offset some of the costs?

Part of the proposal is to provide the Commission the possibility to create new marketing standards for protein crops, beef, pigmeat, sheepmeat, goatmeat, and cheese. Detail on the specific marketing standards for each proposed new sector/product are unknown and would be outlined in future delegated or implementing legislation. Any new standards may or may not require labelling changes.

The proposals for meat-related terms also may not require labelling changes if products comply (e.g. meat-alternative vegan or vegetarian products). DAERA is not currently aware of any products being sold that would not comply with the proposals.

The estimated cost of any labelling changes, if required, are unknown and would likely vary by product or business. Agri-food businesses would update packaging periodically, but the cadence would be determined by specific product or business need. Theoretically, any labelling changes, if required to comply with the proposal, could be undertaken during other wider product or labelling refreshment which might remove or lessen any associated cost. However, we have not engaged any local producers on these proposals, and none have raised this issue with the Department.

5. DAERA states that NI-based producers impacted by the amendments regarding meat-related terms would have 12 months before these provisions enter into force. Does this provide businesses with sufficient time to adapt to the changes?

The Commission has included in the proposed Regulation that the rules on meat-related terms would apply from 12 months after the date of entry into force of the legislation. The Commission states that this is in order to give stakeholders sufficient time to adapt.

It is unclear whether this would provide all producers of non-meat products sufficient time to amend their packaging, if required to comply with the proposals. It would likely vary by product or business, on production throughput, and the date of minimum durability/ 'use by' date of products.

6. Can you provide information on DAERA's and/or UKG's plans, if any, to engage with stakeholders in relation to the proposed EU act?

As the proposal relates to food law, if it is adopted by the Commission, the Department would have a legal requirement to consult stakeholders prior to making any domestic legislation enforcing the new requirements.

If adopted, DAERA will also engage with businesses to assist in their preparedness, prior to the proposals entering into force.

7. In DAERA's assessment, what, if any, are the likely benefits for businesses and/or consumers in NI if the proposed EU act were to apply?

For marketing standards in general, having standardised production or accepted definitions for certain agricultural products can facilitate trade and be helpful for consumers or purchasers, especially when distance selling or the purchaser is unsighted on the goods themselves. However, the Department is not aware of any consumer body or industry requests for greater regulation of those agricultural products to which the new marketing standards may apply.

Similarly, regulating the use of certain terms, such as the proposal around meat-related terms, could help ensure that consumers are well informed about food products and are not misled. The Food Standards Agency NI (FSANI) is responsible for general food labelling and for the "food information for consumers" regulation, which states that food information, including in relation to a product's properties or composition, shall not be misleading. Therefore, it could be argued that this proposal on meat-related terms merely solidifies that existing requirement.

As the proposed amendments relate to amending provisions of the CMO that fall within DAERA's remit, the Department has currently assumed responsibility for these new regulations restricting the use of these meat terms but is working closely with FSANI

on the proposals. As with the new marketing standards sectors, the Department is not aware of any consumer body or industry requests for greater regulation of those meat-related terms, nor has the Department received any complaints that consumers have been misled by the marketing of non-meat products.