BREXIT

Practical considerations for citrus growers and exporters

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While the United Kingdom (UK) left the European Union (EU) on 31 January 2020, the first operational effects of this decision apply from 1 January 2021. As this date approaches, the significance of Brexit for the United Kingdom (UK) itself, the European Union (EU) and non-EU countries is now becoming more apparent. At the time of writing, a number of uncertainties still remain about the practical application of the new regulatory regimes for trade.

Given these uncertainties, here are a few considerations exporters should be mindful of as they approach the 2021 citrus export season:

- **UK-EU trade:** The extent of UK-EU trade is significant (Freshfel estimates 3.2 million tonnes of fruit annually). Handling the administration around this trade is likely to be the main focus for UK regulatory bodies in 2021. SA may be swept up in the operational changes the UK needs to make to cope with EU trade.
- **UK-SA trade:** UK-SA trade agreements are already in existence (SACUM-UK EPA), so no changes are expected for SA products entering the UK initially.
- **Phytosanitary requirements:** Unless otherwise advised, phytosanitary requirements will remain as they are for the UK. They could possibly remove the requirement for phytosanitary certificates in 2021.
- **Phytosanitary certification:** Currently the UK has no system in place to accept electronic phytosanitary certificates (eCert documentation).They rely entirely on paper-based phytosanitary documentation. Options to connect to existing electronic systems are being considered by the UK. Increased administration to handle EU product could put pressure on UK inspection bodies, but they will be phasing in a risk-based mythology over the course of the year to determine which product/ countries to target and to calculate corresponding inspection frequency.
- **Import notifications:** The UK has indicated that any pre-existing notification applicable for products destined for the UK will be maintained in 2021. There is a strong possibility that the UK may change its position this year.
- **Re-exported products:** Can products originating in SA be re-exported from the EU to the UK, and vice versa? The ruling is that products that have been cleared and circulated through the EU and are being exported to the UK, will be treated as if they were produced/originated in the EU. Products being exported from the UK to the EU will have to comply with all existing EU rules that would apply for the originating country.
- **MRLs and food safety:** The UK is expected to publish a new set of food safety regulations and MRLs applicable in the UK and Northern Ireland on 1 January 2021 – initially adopting all the existing EU MRLs at this time. From this date onwards MRLs could slowly diverge. CGA will keep the industry informed of any relevant MRL changes.
- **Organic produce:** Rules for organic produce sent directly from SA to the UK remain as they are. Operators moving products to the UK for further export into the EU, or vice versa, should be careful to adhere to new rules, including specific labelling requirements and the use of the EU organic logo.

CGA will continue to monitor the situation in the EU, working with local partners (i.e. FSA, FPEF) and international affiliates (i.e. SHAFFE and Freshfel) to address any issues that arise and to ensure continued market access to both these markets.

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