Report Annex III: Trade And Trade Barriers Additional Analysis

Table Of Contents

1.	Tariff	fs	3
2.	TRQS		6
3.	NTM	s	15
	3.1 L	JK-Australia	15
	3.1.1	Importing from Australia – Key Requirements	15
	3.1.2	Detailed NTM AVE Estimates	18
	3.2 L	JK-New Zealand (NZ)	21
	3.2.1	Importing from NZ – Key Requirements	21
	3.2.2	Detailed NTM AVE Estimates	25
	3.3 L	JK-Canada	28
	3.3.1	Exporting to Canada – Key Requirements	28
	3.3.2	Detailed NTM AVE Estimates	32
	3.4 L	JK-GCC	35
	3.4.1	Exporting to the GCC – Key Requirements	35
	3.4.2	Detailed NTM AVE Estimates	37
Re	ference	os	40

1. Tariffs

The tables below provide an overview of the tariff ranges for both the UK Global Tariff (UKGT) and for the EU Common External Tariff (CET) which was obtained via the Gov.uk website¹. The UKGT will be used as the basis to compare the pre-Brexit/pre-FTA tariffs applicable for the countries/blocs within scope.

As some products are selected for analysis at the HS6 level, there are multiple tariffs applicable when one examines the tariffs at the HS8 level. This is especially the case for meat and dairy. Table III-1 below provides a range (Low to High) for both the UKGT and the EU CET.

In general, the UKGT converts the EU CET into GBP terms using an approximate exchange rate of $\le 1 = \pm 0.83$. Most tariff changes are due to currency conversions and rounding although there are some instances of simplification (e.g., potatoes).

Table III-1: Comparison of UK Global Tariff (UKGT) and EU Common External Tarif (CET) for Selected Products

HS Code	Short Description	UKGT – Low\	UKGT - High	EU CET - Low	EU CET - High	Reason for Change
020110	Chilled beef carcases/half-carcases	12.00% + 14 GBP/100kg	12.00% + 147.00 GBP/100kg		5.80	Currency (+ Rounding)
020130	Chilled Boneless Beef	12.00% + 25 GBP/100kg	33.00	12.80% + 303 EUR/100 kg	3.40	Currency (+ Rounding)
020230	Frozen boneless beef	12.00% + 185.00 GBP/100kg	12.00% + 254.00 GBP/100kg	12.80% + 221.10 EUR/100 kg	12.80% + 304.10 EUR/100 kg	Currency (+ Rounding)
020410	Chilled lamb carcases and half-carcases	12.00% + 14 GBP/100kg	13.00	12.80% + 171.30 EUR/100 kg		Currency (+ Rounding)
020442	Frozen sheepmeat cuts, with bone in	12.00% + 75.00 GBP/100kg	12.00% + 140.00 GBP/100kg	12.80% + 90.20 EUR/100 kg	12.80% + 167.50 EUR/100 kg	Currency (+ Rounding)
020422	Chilled sheepmeat cuts, with bone in	12.00% + 100.00 GBP/100kg	12.00% + 186.00 GBP/100kg	12.80% + 119.90 EUR/100 kg	12.80% + 222.70 EUR/100 kg	Currency (+ Rounding)
020443	Frozen boneless sheepmeat	12.00% + 19 GBP/100kg	96.00	12.80% + 234 EUR/100 kg	4.50	
020423	Chilled boneless sheepmeat	12.00% + 260.00 GBP/100kg		12.80% + 311.80 EUR/100 kg		Currency (+ Rounding)
040510	Butter (excl. dehydrated butter and ghee)	158.00 GBP/100kg	193.00 GBP/100kg	189.60 EUR/100 kg	231.30 EUR/100 kg	Currency (+ Rounding)

HS Code	Short Description	UKGT – Low\	UKGT - High	EU CET - Low	EU CET - High	Reason for Change
040590	Fats and oils derived from milk, and dehydrated butter and ghee (excl. natural & other butter) Fats and oils derived 231.30 EUR/100 kg		Currency (+ Rounding)			
040610	Fresh Cheese (unfermented)	154.00 GBP/100kg	185.00 GBP/100kg	185.20 EUR/100 kg	221.20 EUR/100 kg	Currency (+ Rounding)
040690	Cheese (excl. fresh cheese, incl. processed and blue-vein cheese)	126.00 GBP/100kg	185.00 GBP/100kg	151.00 EUR/100 kg	221.20 EUR/100 kg	Currency (+ Rounding)
100199	Wheat and meslin (excl. seed)	0.00%	79.00 GBP/1000kg	0.00 EUR/tonne	95.00 EUR/tonne	Currency (+ Rounding)
100390	Barley (excl. seed)	0.00%	77.00 GBP/1000kg	0.00 EUR/tonne	93.00 EUR/tonne	Currency (+ Rounding)
070110	Seed potatoes	4.00%		4.50%		Simplification
070190	Potatoes (fresh, excl. seed)	10.00%		11.50%		Simplification

Source: UK Government, analysed by The Andersons Centre

2. TRQs

This section presents supplemental information on WTO TRQs for the agri-food products examined in this study. Table III-2 presents an expanded overview of the TRQs available for each product examined for selected countries and commodities. As the data presented are based on an April 2022 update from the UK Government on the WTO TRQs that the UK will be making available to non-EU countries, it contains some slight differences vis-à-vis the proposed reallocation of WTO TRQs between the UK and the EU27, published in December 2018.

The TRQs presented in Table III-2 form part of a Statutory Instrument that the UK is using to establish its own regime for managing its TRQ commitments granted via the WTO agreements. Most of these TRQs use a first-come first-served allocation system.

For the non-EU partners within the scope of this study, they potentially have a combined access amounting to 61,230t of beef TRQ. Some of these TRQs are granted to individual countries (e.g. Australia) whilst others are either granted on a combined basis (e.g. to the US/Canada) or are more widely available to all countries excluding the EU (which already has tariff- and quota-free access to the UK). The inquota tariff rates for these beef TRQs vary. Some have a flat 20% tariff whilst others have both a specific and a percentage component (e.g., 20% + £832.26/t for frozen forequarters).

As regards sheepmeat, there are 127,562t of TRQ potentially available to the non-EU partners within scope. Nearly 90% of this is allocated to NZ (114,205t), with Australia (13,335t) accounting for the majority of the remainder. All of the sheep TRQs listed below have in-quota tariff rates of 0%.

There are various dairy-related TRQs available and amount to 53,383t and consist of a variety of products including butter, cheddar cheese and skim-milk powder (SMP). Again, NZ has a dominant share (circa 61%) whilst Australia and Canada have 5.5% and 7.5% respectively. The remaining TRQ is open to all non-EU countries.

For wheat and barley, the UK has granted WTO TRQs amounting to 123,325t and 30,101t respectively. Wheat has an in-quota tariff of £10.04/t whilst barley has an in-quota tariff of £6.69/t. Given current grain prices, these tariffs are considered to be small. For wheat, Canada nominally has a 30% share, although this 37,390t TRQ is managed jointly with the EU, so it is unlikely that the full volume would enter the UK and this TRQ could be superseded by an enhanced FTA between the UK and Canada in future. The remaining wheat TRQ is allocated to countries other than the US, Canada and the EU.

The barley TRQ is also allocated to all non-EU countries and as it is specified as being used for the manufacture of beer, it is categorised as malting barley.

Table III-2: UK WTO Tariff Rate Quotas arising from EU Exit Regulations 2020

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
Beef	05.0144; 05.0145	0202 20 30; 0202 30 10; 0202 30 50; 0202 30 90; 0206 29 91	Frozen beef and beef offal	Countries other than EU Member States	20% + £832.26/t (for HS codes: 0202 20 30) 20% + £1,300.74/t (for HS codes: 0202 30 10 and 0202 30 50) 20% + £1,789.56/t (for HS codes: 0202 30 90 and 0202 29 91) All others: 20%	44,027	Quota allocated based on bone-in weight
Beef	05.4451	0201 20 90; 0201 30 00; 0202 20 90; 0202 30 10; 0202 30 50; 0202 30 90; 0206 10 95; 0206 29 91;	Chilled and frozen beef and beef offal	Australia	20%	3,761	Allocated on product weight basis. Valid from July 2022. (4,669T until end June 2022)

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
Beef	05.4002	0201 10 00; 0201 10 00; 0201 20 20; 0201 20 20; 0201 20 30; 0201 20 30; 0201 20 50; 0201 20 50; 0201 20 90; 0201 30 00; 0202 10 00; 0202 20 10; 0202 20 30; 0202 20 50; 0202 20 90; 0202 30 10; 0202 30 50; 0202 30 90; 0206 10 95; 0206 29 91.	Chilled and frozen beef and beef offal	USA/Canada	20%	1,000	Allocated on product weight basis
Beef	05.4454	0201 20 90; 0201 30 00; 0202 20 90 11; 0202 30 10 11; 0202 30 50 11; 0202 30 90 11; 0206 10 95 11; 0206 29 91 11.	Chilled and frozen beef and beef offal	New Zealand	20%	454	
Beef	05.4003	0202 10 00; 0202 20 10; 0202 20 30; 0202 20 50; 0202 20 90; 0202 30 10; 0202 30 10; 0202 30 50; 0202	Chilled and frozen beef and beef offal	Countries other than EU Member States	20%	11,143	

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
		30 90; 0202 30 90; 0206 29 91.					
Beef	05.4001	0202 30 90	Frozen beef	Australia	20%	845	Allocated on boneless weight basis.
Beef	Sub- total			All		61,230	
Sheepmeat	05.2012; 05.2105; 05.2106	0204 10 00; 0204 21 00; 0204 22 00; 0204 30 00; 0204 41 00; 0204 42 00; 0204 50 11; 0204 50 13; 0204 50 15; 0204 50 19; 0204 50 31; 0204 50 51; 0204 50 53; 0204 50 55; 0204 50 59; 0204 50 71.	Chilled and frozen sheepmeat; Chilled and frozen goatmeat (HS codes commencing with 0204 50)	Australia	0%	13,335	Quota allocated on carcase weight basis

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
Sheepmeat	05.2013; 05.2109; 05.211	0204 10 00; 0204 21 00; 0204 22 00; 0204 30 00; 0204 41 00; 0204 42 00; 0204 50 11; 0204 50 13; 0204 50 15; 0204 50 19; 0204 50 31; 0204 50 51; 0204 50 53; 0204 50 55; 0204 50 59; 0204 50 71; 0204 23 00; 0204 23 00; 0204 43 10; 0204 50 39; 0204 50 79; 0204 23 00; 0204 23 00; 0204 43 90; 0204 50 39; 0204 50 79.	Chilled and frozen sheepmeat; Chilled and frozen goatmeat (HS codes commencing with 0204 50)	New Zealand	0%	114,205	Quota allocated on carcase weight basis
Sheepmeat	05.2016; 05.2178; 05.2179	0204 10 00; 0204 21 00; 0204 22 00; 0204 30 00; 0204 41 00; 0204 42 00; 0204 50 11; 0204 50 13; 0204 50 15; 0204 50 19; 0204 50 31; 0204 50 51; 0204 50 53; 0204	Chilled and frozen sheepmeat; Chilled and frozen goatmeat (HS codes commencing	Countries other than EU Member States	0%	22	Quota allocated on carcase weight basis

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
		50 55; 0204 50 59; 0204 50 71; 0204 23 00; 0204 23 00; 0204 43 10; 0204 50 39; 0204 50 79; 0204 23 00; 0204 23 00; 0204 43 90; 0204 50 39; 0204 5079;	with 0204 50)				
Sheepmeat	Sub- total	,				127,562	
Dairy products	05.0147	0402 10 19	Skim-milk powder	Countries other than EU Member States	£397.51/t	5,620	
Dairy products	05.0151	0406 90 01	Other cheese	Countries other than EU Member States	£698.78/t	8,266	
Dairy products	05.4195	0405 10 11; 0405 10 19; 0405 10 30.	Butter	New Zealand	£585.80/t	27,516	
Dairy products	05.4595	0406 90 21	Cheddar cheese	Countries other than	£175.74/t	64	

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
				EU Member States			
Dairy products	05.4514	0406 90 21	Cheddar cheese	New Zealand	£142.70/t	2,639	
Dairy products	05.4513	0406 90 21	Cheddar cheese	Canada	£112.90/t	4,000	
Dairy products	05.4521	0406 90 21 00	Cheddar cheese	Australia	£142.60/t	350	
Dairy products	05.4522	0406 90 01 00	Cheddar cheese	Australia	£142.60/t	2,598	
Dairy products	05.4515	0406 90 01	Other cheese	New Zealand	£142.70/t	2,330	
Dairy products	Sub- total					53,383	
Wheat	05.4124 (EU order no. 05.9124)	1001 99 00	Low and medium quality wheat	Canada	£10.04/t	37,390	Managed jointly with old EU28 TRQ (order no. 05.9124). Quota volume is based on 2018 UK-EU agreement on TRQ splits.

Category	Quota Nos	HS Codes	Brief Descriptions	Beneficiary	Quota Rate	Quota (T)	Comments
Wheat	05.4125	1001 99 00	Low and medium quality wheat	Countries other than US, Canada, or EU Member States	£10.04/t	85,935	
Wheat	Sub- total					123,325	
Barley	05.0076	1003 90 00	Barley excluding seed	Countries other than EU Member States	£6.69/t	30,101	To be used for the manufacture of beer aged in vats containing beechwood (i.e., malting barley)
Barley	Sub- total					30,101	

Sources: HMRC and HM Treasury², analysed by The Andersons Centre

3. NTMS

This section provides additional detail on the NTMs costs compiled during this study. The Summary Report focuses on outlining probability-based NTM estimates on an Ad-Valorem Equivalent (AVE) basis. Here, NTM estimates are also shown for "checked loads" (unlucky loads subject to the full range of regulatory checks). As the pricing data is also provided NTMs, can also be assessed on a £ per tonne basis. Further methodological information is available in Annex I.

This Section looks at NTMs on a partner-by-partner basis. For each partner, an overview of the key regulatory steps that must be fulfilled when trading internationally is provided. Broadly speaking, these steps are set-out with regards to the general regulatory steps which apply across all products as well as the specific steps which apply for each product category (beef, dairy etc.). Thereafter, the detailed NTM costs are set-out.

Although UK-EU trade is not specifically within the scope of this study, additional information on the NTM AVEs applicable to UK-EU trade is also provided. Readers interested in further detail on how UK-EU NTM costs were developed should consult Andersons 2020 Brexit study conducted on behalf of the Scottish Government³.

3.1 UK-AUSTRALIA

3.1.1 Importing from Australia – Key Requirements

The main focus of the NTMs assessments is centred on shipments from Australia to the UK as these will have the biggest impact on Scottish agriculture. This is due to the products within scope for this study, the fact that Australia is a large exporter for most commodities, and the UK (Scotland) being uncompetitive unless exporting high-value niche products.

Like most countries, meat processors need to have the appropriate licences to operate. In addition, there are also preliminary steps which must be taken before exportation of goods can take place. This includes registering an establishment, a process overseen by the Australian Department of Agriculture, Water and the Environment⁴. Food exports are regulated by the Export Control Act 2020⁵.

Below are the key regulatory costs associated with exporting from Australia to the UK. These are segmented based on general requirements across all products and specific requirements relating to each category.

General Requirements:

- **Obtain an export permit (licence):** this is required for all products and needs to be submitted to the <u>Australian Border Force (ABF)</u>⁶.
- **Export declaration:** is required to be submitted to the <u>Australian Border Force</u> (ABF) up to 6 months before the shipment takes place. Submissions can be done electronically.
- **Country of origin certificate:** like most countries, these can be issued by Australian Chambers of Commerce and other industry bodies. Whilst fees vary, the Australian Industry Group⁷ charges AU\$26-42 (£14-23) per certificate depending on whether the applicant is a member or non-member. There is also a registration fee for non-members of AU\$60 (£33).

Meat Export Shipments Requirements

The charges relating specifically to each meat export shipment from an SPS perspective include;

- Obtain an export permit (meat export licence): this is required before the goods can leave Australia. The meat export licence is charged at AU\$284 (£155) annually but is obviated if the plant exporting is already a registered establishment (cost AU\$1,129 (£618) per month).
- **Throughput charge:** is applied to all establishments that slaughter or dress animals for export. The charge for cattle is AU\$0.40 (£0.22) per head and AU\$0.10 (£0.05) per lamb. In the context of exporting a Kg of beef or lamb, these costs are minimal and equate to a fraction of a penny per Kg.
- **Documentation charges:** export certificates for meat products can be generated electronically or manually. An electronic certificate is charged at AU\$32 (£18) per document, whilst the manual equivalent costs AU\$38 (£21). Any replacement certificates are charged at AU\$500 (£274) per document.
- **Inspection fees:** Meat inspections are charged at either the Food Safety Meat Assessor (FSMA) rate (AU\$25-35 (£14-19) per 15 mins), or the higher On Plant Veterinarian (OPV) rate (AU\$45 (£25) per 15 mins) when veterinary competencies are required. Fees can also be allocated on a monthly or annual basis and there are additional overtime fees as well.

Dairy Export Shipments Requirements

The fees broadly follow the same structure as meat with separate establishmentrelated fees and ongoing documentation and inspection fees. The key ongoing fees include;

- **Documentation charges:** export certificates for meat products can be generated electronically or manually. An electronic certificate is charged at AU\$31 (£17) per document, whilst the manual equivalent costs AU\$145 (£79). Any replacement certificates are charged at AU\$533 (£292) per document. These charges are also applicable for a tariff rate quota certificate.
- **Inspection fees:** inspections are charged at AU\$53 (£29) per 15 mins, or the higher On Plant Veterinarian (OPV) rate (AU\$45 (£25) per 15 mins) when veterinary competencies are required. Fees can also be allocated on a monthly or annual basis and there are additional overtime fees as well.

Grain Export Shipments Requirements

The fees are levied slightly differently to products of animal origin. There are annual fees for registered establishments of AU\$5,812 (£3,182) for bulk operations. Other key fees include;

- **Export tonnage charge:** is applied for each tonne of grain (and horticultural products) exported. It is levied when the applicant applies for an export permit (costing AU\$12 (£7) per document). Grain is charged at AU\$0.11 (£0.06) per tonne, again a very small proportion of the value of grain.
- **Documentation charges:** phytosanitary certificates can be generated electronically or manually. An electronic certificate is charged at AU\$46 (£25) per document, whilst the manual equivalent costs AU\$97 (£53). A replacement phytosanitary (phyto) certificate costs AU\$533 (£292) per document. Other government documentation (permits and other certificates) cost \$12 (£7) when issued electronically and \$97 (£53) per document when issued manually.

Horticultural Export Shipments Requirements

The fees are charged in a similar manner to grain. There are annual fees for registered establishments and range from around AU\$4,500 (£2,464) to over AU\$9,130 (£4,999). Other key fees include;

- **Export tonnage charge:** is applied for each tonne exported and range from AU\$0.99 (£0.54) to AU\$1.98 (£1.08) per tonne. It is levied when the applicant applies for an export permit (costing AU\$12 (£7) per document).
- **Documentation charges:** phytosanitary certificates can be generated electronically or manually. An electronic certificate is charged at AU\$76 (£42) per document for horticultural products, whilst the manual equivalent costs AU\$152 (£83). A replacement phyto certificate costs AU\$533 (£292) per document. Other

government documentation (permits and other certificates) cost \$18 (£10) when issued electronically and \$152 (£83) per document when issued manually.

3.1.2 Detailed NTM AVE Estimates

Table III-3 sets-out the NTM estimates for Australia to UK trade. The prices are based on UN Comtrade data and depict the average annual export price of selected products from Australia to all countries for the 2018-2020 period. Whilst it is arguable that the NTM AVEs should be based on Australia-to-UK trade only, it is important to note that with the introduction of the new FTA, greater volumes of Australian product will be available to export to the UK which was not available previously. As such, this additional volume will be coming from product that was previously routed elsewhere. Therefore, focusing on the exportable price from Australia is a more realistic starting point for the level of competition that Scottish and UK suppliers will face in the future.

Table III-3: NTM AVEs for Selected Products for UK-Australia (AU) Trade

LIC Code	Product Description	Prices (£/T)		UK Import	s from AU	UK Exports to AU		
HS Code		AU-UK	UK-AU	Checked	Probability	Checked	Probability	
020130	Chilled boneless beef	5,101	4,840	24.9%	2.1%	25.4%	5.4%	
020230	Frozen boneless beef	2,987	2,220	9.2%	3.0%	12.4%	7.4%	
020110	Chilled beef carcases/half-carcases	2,165	2,171	30.5%	4.4%	34.6%	9.8%	
Beef	Sub-total	4,959	3,445		2.6%		6.5%	
020410	Chilled lamb carcases and half-carcases	3,716	3,497	26.5%	2.8%	25.8%	5.7%	
020442	Frozen sheepmeat cuts, with bone in	2,783	2,417	9.8%	3.3%	9.5%	5.4%	
020422	Chilled sheepmeat cuts, with bone in	5,239	3,558	25.1%	2.4%	26.0%	5.8%	
020443	Frozen boneless sheepmeat	3,693	3,187	7.9%	2.5%	7.7%	4.2%	
020423	Chilled boneless sheepmeat	5,475	4,584	24.2%	2.0%	24.0%	4.8%	
Sheep	Sub-total	4,780	3,876		2.9%		4.9%	
040690	Cheese (excl. fresh cheese, incl. processed & blue-vein cheese)	3,084	3,784	7.7%	2.7%	7.4%	2.7%	
040610	Fresh cheese (unripened or uncured cheese)	2,931	2,819	8.2%	2.9%	9.2%	3.6%	
040510	Butter (excl. dehydrated butter & ghee)	3,719	3,390	6.6%	2.1%	8.0%	3.1%	

040590	Fats and oils derived from milk, (excl. natural & other butter)	4,130	4,492	7.8%	2.7%	6.6%	2.3%
Dairy	Sub-total	3,214	3,677		2.7%		2.8%
100199	Wheat (excl. seed)	347	167	5.3%	0.2%	5.3%	0.1%
100390	Barley (excl. seed)	865	157	5.3%	0.2%	5.3%	0.1%
070110	Seed potatoes	729	517	18.0%	4.3%	22.1%	7.2%
070190	Potatoes (fresh, excl. seed)	418	336	33.0%	6.4%	35.7%	7.6%
Potatoes	Sub-total	470	517		6.0%		7.2%

Sources: UN Comtrade, HMRC and The Andersons Centre (2022)

3.2 UK-New Zealand (NZ)

As with Australia, NZ is a large exporter of the products within scope for this study and the UK (Scotland) is uncompetitive unless exporting high-value niche products. Therefore, the NTMs assessments below focus on imports from NZ into the UK as they will have the biggest impact.

The NZ Ministry for Primary Industries (MPI)⁸ have outlined key steps to undertake when exporting from NZ. These can again be grouped in terms of general and specific requirements for each product category.

3.2.1 Importing from NZ – Key Requirements

General Requirements:

• Comply with NZ legislation and food standards: as a minimum this involves adhering to the provisions of the Animal Products Act 1999⁹, the Food Act 2014¹⁰ (requires companies to be registered as a food business) and the Australia New

- Zealand Food Standards Code¹¹. Registering a business (obtaining official assurance) under the Food Act costs NZ\$270-405 (£139-208) per application for the first registration with an annual renewal fee of NZ\$67.50 (£35) thereafter¹², but where more than 1.5 hours is required an hourly fee of NZ\$135 (£69) is applied.
- Register as an exporter: this can be done online via the MPI website and necessitates developing and operating a risk management programme (RMP). The application for an RMP forms part of the application for official assurance (see above). This application then requires verification from the MPI and results in the provision of an E-cert which is required throughout any exportation process. According to the MPI, there is an annual exporter registration fee of NZ\$135 (£69) for processors.¹³
- **Obtain export clearance:** this must be done via the <u>NZ Customs Service</u>¹⁴ but can also be undertaken on a company's behalf by a customs agent or freight forwarder. Fees vary depending on whether goods are exported under NZ's Secure Exports' Scheme (basically the equivalent of an Authorised Economic Operator (AEO) programme). As of June 2021, this fee is charged at NZ\$3.27 (£2) per transaction under the Secure Exports' Scheme and NZ\$6.82 (£3.50) per transaction for other exports. If additional customs time is required, these are levied at NZ\$133 (£68) per hour with a minimum charge of NZ\$399 (£205) always applying¹⁵.
- Country of Origin (CoO) certificate: like most countries, these are usually issued by Chambers of Commerce in NZ, although meat CoOs are issued by the NZ Meat Board¹⁶. The fee ranges from NZ\$14-45 (£7-23) per certificate depending on whether the applicant is a member or non-member of a Chamber. For beef and lamb, the charges range from NZ\$10 (electronic) to NZ\$40 (manual) (£5-21) if the certificate is issued in Wellington. If the certificate needs to be issued in Brussels, the fee rises to NZ\$150-200 (£77-103) depending on if the shipment is via air or sea freight.

Meat Export Shipments Requirements

The key charges relating meat export shipment from an SPS perspective are set-out in the Animal Products (Fees, Charges, and Levies) Regulations 2007¹⁷ (updated November 2021). The key requirements include;

• **Register for E-cert for meat exports:** An animal products E-cert is what MPI uses to issue official government assurances for animal products, including meat, that are exported from NZ¹⁸. It is used at each step of the production process, so that operators add required information to E-cert. At the end of the process, the

exporter uses E-cert to apply for official assurance or an export certificate. These costs are levied on a per request basis (NZ\$0.08-\$0.15) (£0.04-0.08) based on information that is requested from the database and on a cost per second basis to download requested information from the database (\$0.01-\$0.02 (circa £0.01) per second)¹⁹.

- **Apply for a meat export certificate:** this is done via E-cert. Once the required information has been submitted, it needs approval from the MPI who will issue the official assurance (export certificate) via E-cert. The specific requirements vary depending on the destination and the Official Assurances specifications needed. The fee is included in the official assurance charges below.
- Official assurance charges: this is based on an initial fee of NZ\$33.75 (£17) plus an hourly rate of \$135 (£69) after the first 15 minutes required to issue an official assurance.
- **Throughput charge:** similar to Australia, a levy is charged to all establishments that slaughter animals for export. The charge for cattle is NZ\$1.047 (£0.54) per head whilst for lambs, the charge is \$NZ0.15 (£0.08) per head. In the context of exporting a Kg of beef of lamb, these costs are minimal and equate to a fraction of a penny per Kg. For other primary and secondary processors that do not slaughter the annual fee is NZ\$704.50 (£362).²⁰
- **Documentation charges:** there is a charge to certify that products exported have met relevant requirements under the Animal Products Act, the fee is NZ\$32 (£16) for issuing a statement of a New Zealand standard.
- Quota fees: as both NZ lamb and beef can avail of TRQ access to the UK, there are additional fees involved. There are fixed participation fees of NZ\$3,000 (£1,541) lamb)) and NZ\$900 ((£462) beef). There is a variable participation fee of NZ\$2.40 (£1.23) per tonne and an additional special levy of NZ\$0.02 (£0.01) per tonne.
- Other market access fees: are based an application fee for an MPI market access function (NZ\$135 (£69) per application) which also pays for the first hour of work. Thereafter, a fee of NZ\$135 (£69) per full hour applies with the final hour charged at 15-minute blocks, each with a NZ\$33.75 (£17) fee²¹.

Dairy Export Shipments Requirements

The steps for exporting dairy products from NZ broadly follow the same lines as those for meat products. In other words, processors must meet NZ requirements, register as an exporter and for the E-cert service and apply for an export certificate

whilst meeting the destination country requirements. The key differences in terms of requirements and fees are set out below. The fees are based on Animal Products (Dairy Industry Fees, Charges, and Levies) Regulations 2015 (updated November 2021).²²

- **Additional documentation:** documents to ensure product traceability and to demonstrate that products are free from prohibited contaminants and residues must be lodged on the E-cert portal²³.
- Dairy exporters' levy: relating to the development and maintenance of market access standards (encompassing export standards) is a formula-based charge. This is determined by the amount of milk solids exported in the previous year by each large exporter, as a proportion of total milk solids exported in the previous year for all large exporters. An annual fee of NZ\$200 (£103) is collected from small processors.²⁴

Grain Export Shipments Requirements: as exports of grain from NZ to the UK are minimal, aside from niche exports relating to seed products (not within scope), an overview has not been provided.

Horticultural Export Shipments Requirements: as exports of seed potatoes from all non-EU countries to Scotland are prohibited (with the exception of Switzerland), direct seed potato imports from NZ to Scotland do not take place²⁵. However, NZ is a significant exporter of potatoes and potato products with Potatoes NZ estimating that over 100Kt are exported annually²⁶. However, seed potato exports are small (just 25 tonnes in 2020), estimated at just 1% of the value of seed potatoes grown according to the Potatoes NZ 2021 annual report²⁷. Key requirements are;

- Register with Potatoes NZ, as this is a requirement for those exporting potatoes or those seeking to import potatoes from NZ.
- Meet New Zealand's food safety requirements (a requirement for all suppliers)
- Meet the phytosanitary, food safety, quality grade, and labelling requirements for the destination country.
- Comply with extra requirements for specific commodities, where necessary. For
 potatoes, this encompasses verifying that they are free from Potato Cyst
 Nematode and are grown in an area free from potato wart. In addition, it is also
 required to register as a potato exporter with the MPI. To become an MPIapproved organisation, there is an NZ\$480 (£247) application fee.
- Use MPI-authorised Independent Verification Agencies (IVAs), or MPI-approved service providers, or facilities for phytosanitary activities. According to the MPI²⁸,

there is an application fee of NZ\$480 (£247) to become approved for phytosanitary certification. To be approved for ePhyto which makes the process of exporting much quicker, there is an application fee of NZ\$44.44 (£23). An export phytosanitary certificate costs NZ\$24.77 (£13) for non-food products and NZ\$38.29 (£20) for food products.

• Grading fees are levied at NZ\$44 (£23) although there is a registration fee of NZ\$2,500 (£1,285). Any additional fees are levied at NZ\$125 (£64) per hour.

3.2.2 Detailed NTM AVE Estimates

Table III-4 shows the preliminary NTM estimates for UK-NZ trade. As noted earlier, whilst NTM estimates for UK exports are provided for comparison purposes, given the products within scope and New Zealand's distance from the UK, any exports are minimal. The NTM AVEs presented below are chiefly drawn from desk-based research and incorporate most of the requirements (and associated costings) listed above. However, as some costs (e.g., obtaining official assurance) are overhead costs and not directly associated with shipping individual containers, these have been excluded.

As with the estimates in previous sections for Australia and Canada, the NTMs are presented on both a "checked loads" and on a probabilistic basis. Again, these estimates are very much preliminary and will be refined as the primary research is conducted. The refined probabilistic estimates will be used in the MAGNET modelling.

Overall, the probabilistic estimates are much lower than for other selected countries due to the significantly reduced rates of physical checks (1% as opposed to 10-15% for red meat) that NZ enjoys versus elsewhere. However, NTM AVEs are much higher for seed potatoes. A key driver here is the relatively low price per tonne (£355) for UK imports from NZ.

Table III-4: NTM AVEs for Selected Products for UK-NZ Trade

uc cada	Due do et Description	Prices (£/T)		UK Imports	from NZ	UK Exports	to NZ
HS Code	Product Description	NZ-UK	UK-NZ	Checked	Probability	Checked	Probability
020130	Chilled boneless beef	6,654	4,840	7.6%	1.0%	8.3%	1.8%
020230	Frozen boneless beef	3,925	2,220	5.0%	1.7%	7.8%	3.9%
020110	Chilled beef carcases/half-carcases	6,474	2,171	7.6%	1.0%	13.4%	4.0%
Beef	Sub-total	4,292	3,208		1.6%		3.1%
020410	Chilled lamb carcases and half-carcases	5,557	4,537	8.0%	1.2%	8.5%	2.0%
020442	Frozen sheepmeat cuts, with bone in	4,470	3,136	4.5%	1.5%	5.8%	2.8%
020422	Chilled sheepmeat cuts, with bone in	7,075	4,617	7.6%	1.1%	8.5%	2.0%
020443	Frozen boneless sheepmeat	5,709	4,135	3.8%	1.2%	4.7%	2.1%
020423	Chilled boneless sheepmeat	8,759	5,947	6.7%	0.8%	7.4%	1.5%
Sheep	Sub-total	5,364	3,345		1.3%		2.7%
040690	Cheese (excl. fresh cheese, incl. processed and bluevein cheese)	3,084	3,784	4.5%	1.6%	4.3%	1.7%

Potatoes	Sub-total	690	336		2.7%		5.7%
070190	Potatoes (fresh, excl. seed)	690	336	15.7%	2.7%	21.6%	5.7%
070110	Seed potatoes	776	517	10.4%	2.9%	13.2%	4.6%
100390	Barley (excl. seed)	865	157	1.1%	0.1%	1.1%	0.1%
100199	Wheat (excl. seed)	347	167	1.1%	0.1%	1.1%	0.1%
Dairy	Sub-total	3,641	3,642		1.4%		1.8%
040590	Fats and oils derived from milk, (excl. natural & other butter)	4,130	4,492	3.7%	1.2%	3.8%	1.5%
040510	Butter (excl. dehydrated butter and ghee)	3,719	3,390	4.0%	1.3%	4.7%	1.9%
040610	Fresh cheese (unripened or uncured cheese)	2,931	2,819	4.7%	1.7%	5.4%	2.3%

Sources: UN Comtrade, HMRC and The Andersons Centre (2022)

3.3 UK-CANADA

The Canada-UK Trade Continuity Agreement (CUKTCA) is effectively a rollover of the EU-Canada (CETA) FTA which the UK was a party to when it was an EU Member State. As Chapter 3 notes, the CUKTCA is in the process of being updated and it may include some NTM easements. As such, for imports into the UK from Canada, the NTM requirements are effectively the same as the "Best Estimate" scenario of NTM costs detailed in Evidence Review (Chapter 3 of the Summary Report and Annex II).

Below is an outline of the processes required for exporting meat, dairy, and potatoes to Canada from the UK. As Canada is a major grains producer, it is not anticipated that there will be significant export trade of wheat and barley from Scotland. Furthermore, NTM costs for grains are minimal (0.1%) on a probabilistic basis as outlined in the NTM estimates below.

3.3.1 Exporting to Canada – Key Requirements

General Import Process:

- 1. **Obtain a Business Number:** this is required for importing commercial goods into Canada. It is free and obtainable within minutes via the <u>Canada Revenue</u> Agency (CRA)²⁹.
- 2. **Identify the goods being imported:** this will be used to determine the tariff classification of the goods and whether the goods will be subject to additional controls.
- 3. Decide whether to use a <u>Licensed Customs Broker³⁰</u> or supply documentation directly to the Canada Border Services Agency (CBSA).
- 4. **Determine the country of origin of goods being imported:** this will encompass obtaining a Certificate of Origin.
- 5. **Determine whether goods being imported are subject to permits, restrictions, or regulations:** additional requirements are often needed for agrifood products as set-out below. Note, as Canada is a state-based federation, more than one Government may be involved.
- 6. Obtain an <u>International Import Certificate</u>: this is an end-use assurance document that formally recognizes that the Government of Canada is aware of, and has no immediate objections to, the proposed import of specific goods to Canada by the stated importer, for the stated end-use and end-user. It effectively states that specified goods are, in principle, permitted for import into Canada but importantly, it does not formally authorise the import of goods as additional documentation may be needed.

7. **Safe Food for Canadians Certificate:** this is required for products that are destined for human consumption in Canada. Each licence is valid for two years³¹. The fee for each certificate is just under CA\$261 (£152).

Additional Requirements – Products of Animal Origin

- Import permit: the provisions of the CUKTCA mean that this is not required for beef but is required for other meat products such as poultry. Importantly, for this study, it is also a requirement for dairy products such as butter and cheese which are subject to import controls (listed in the Import Control List (ICL)). Applications need to be made to the Offices of Global Affairs Canada via a customs broker. Direct applications are also possible.
- Obtain permission for commercial importation: whilst Canada has granted permission for the UK to export beef, lamb, and dairy products, individual plants must also obtain approval. This requires an approved Official Meat Import Certificates (OMIC) certificate and attestations which must adhere to the Safe Food for Canadians Regulations (SFCR) (where applicable). The SFCR essentially requires that meat entering Canada has been manufactured, prepared, stored, packaged, and labelled in a manner and under conditions providing at least the same level of protection as meat products produced in Canada. This requirement is regulated by the Canadian Food Inspection Agency (CFIA).
- **Zoosanitary export certificate:** this is an official document, endorsed by an official veterinarian of an exporting country, attesting to animal health statements related to the shipment for export. Its purpose is to ensure that the commodity for import into Canada meets Canada's animal health requirements.³²
- Point of entry control requirements: importers must present all certificates and relevant documents to the <u>National Import Service Centre (NISC)</u>, to verify that the shipment is meeting the requirements, before the shipment is allowed to enter Canada. Requirements include;
 - Valid shipping marks: these are unique numbers to identify each container.
 The NISC verifies these to assure that the same shipping mark was not used within the preceding 12 months and corresponds with OMIC. The OMIC numbers may be used as shipping marks.
 - Proof that CFIA and NISC have reviewed the required documents: this is needed before the CBSA permits entry. From this point, the CFIA also takes over the tracking of the shipment, for its own purposes, until the required inspections have taken place and the shipment may be released to the importer.

- Tracking of imports: data on all imported meat and dairy shipments must be entered manually into the Import Control and Tracking System (ICTS). This enables the CFIA to capture data on all imported meat product shipments, verify validity of the certificate number and the shipping marks, verify eligibility of the exporting country, slaughter, processing and exporting establishments and the label registration number, for export to Canada. The ICTS generates an Import Inspection Report (IIR) and an invoice (for collection of CFIA fees associated with clearance of imported meat shipments) for each shipment. The report is the record of the import transaction for tracking purposes and provides the importer with the inspection assigned to the shipment.
- **Inspection of imports:** shipments must be delivered to an establishment where it will be stored and handled by a person who is licensed to store and handle imported meat products for inspection by a CFIA inspector.³³ Upon arrival, the inspector must conduct a check of the seals and verify that the shipment details correspond with the OMIC. All shipments require a cursory overall inspection of the shipment. Shipping containers are examined for signs of damage or possible refrigeration failure during transport.
 - o **Initial rate of inspections:** a minimum of the first 10 consecutive shipments from a new foreign establishment (e.g., Scottish meat plant) authorised to export to Canada will be subject to full organoleptic (in-depth physical checks) import inspections¹ in a licenced Canadian establishment. After 10 consecutive shipments have successfully passed these inspections, the establishment will automatically be placed into reduced inspection mode.
 - o **Reduced inspection mode:** 1 in every 10 consecutive import shipments will be subject to a full organoleptic import inspection. The other 9 shipments will have a cursory physical check at an approved establishment by a licensed person. If a load fails an inspection, then the subsequent 10 loads will have full inspections imposed (these must have a combined weight of at least 10 times the offending shipment) and the reduced inspection mode will only resume once 10 consecutive loads have successfully passed the inspection.

¹ Organoleptic Import Inspection: Is a physical examination of a representative number of sample units (e.g., cartons, carcasses, combo bins), drawn at the end of visual inspection, using the senses of touch, smell, sight to determine the wholesomeness and cleanliness of a meat product. See: https://inspection.canada.ca/food-safety-for-industry/archived-food-guidance/meat-and-poultry-products/manual-of-procedures/chapter-10/annex-p/eng/1336338386145/1336338469043

• Laboratory sampling: may be drawn for chemical residue monitoring and/or Meat Microbiology Sampling. Importantly, shipments are not detained pending the receipt of laboratory results. If contaminants are detected above Canadian tolerance levels, the CFIA Food Import Export Division (FIED) applies a targeted sampling plan for future shipments of meat product(s) originating from the same establishment. For microbiological and chemical residue non-compliances, fifteen consecutive shipments of at least 15 times the total weight of the meat product found in the original non-compliant shipment are subjected to targeted sampling by the CFIA.

The Canadian system differs from the EU (UK) systems insofar that inspections can be carried out at approved establishments away from the border and shipments do not need to be detained pending the results of laboratory sampling. This means that the scope for value deterioration, which has the biggest impact on NTM costs for loads subject to the full range of regulatory checks (i.e., checked / unlucky loads) is lower than importing into the EU.

• Labelling Requirements: imported meat must also meet the labelling and packing requirements outlined in the SFCR.³⁴ The Canadian food labelling requirements checklist³⁵ is also useful.

Additional Requirements – Seed Potatoes

In Canada, all potato parts for propagation are regulated and all quantities of seed potato imports are regulated equally.³⁶ The key pieces of regulation are the Canadian Plant Health Import Requirements and Seeds Act³⁷ and Seeds Regulations³⁸. Commodities exempt from the full range of Canadian regulation include processed potatoes, frozen potatoes and associated products (e.g., potato chips, potato starch, French fries etc.). Origins other than the continental US are of particular interest from a phytosanitary regulation perspective, as are products destined for Newfoundland and Labrador (similar to how Scotland is distinct from the rest of the UK for seed potatoes regulation).

For Canada generally, the following requirements are specified;

- Import permit (also known as a Permit to Import or a Plant Protection Import Permit): is required. If a pest risk assessment is not required, the fee is almost CA\$36.50 (£12.30). If a pest risk assessment is needed, the fee is CA\$261 (£152).
- **Phytosanitary certificate:** this is required to include the following declaration "The potato plants from which the seed in this consignment was produced were

free of seed-transmitted viruses and viroids". Phytosanitary certification requirements will also be specified on the Permit to Import. The cost of a Canadian phytosanitary certificate for export is CA\$18 (£10).

- **Prior CFIA approval:** this is required for field-grown seed potatoes before importation can commence.
- Importation through Post Entry Quarantine (PEQ): this is also a requirement for field-grown seed potato tubers and will be subject to testing and inspection. The CFIA may approve the importation of commercial quantities upon completion of a pest risk analysis. The fee for onward movement within Canada is nearly CA\$63 (£37) with an accompanying Movement Certificate charged at almost CA\$18 (£10).
- North American Certified Seed Potato Health Certificate (NACSPHC): is
 required for seed potatoes to be planted on farms participating in the Canadian
 Seed Potato Certification Program (CSPCP). This is required for each lot
 imported. This information is used by CFIA to assign an equivalent seed potato
 certification "Class" for each imported lot. There may also be additional
 provincial requirements based on whether the seed potato variety is eligible for
 planting in that province.

If imported shipments do not meet Canadian Plant Health import requirements, they will be refused entry and must be returned to the country of origin or destroyed at the importer's expense.

3.3.2 Detailed NTM AVE Estimates

The preliminary estimates for UK-Canada trade are outlined in Table III-5 on both a "checked loads" and probability basis. The AVEs have been provided for trade in both directions because for products such as beef, it is conceivable that trade could flow in both directions. As wheat trade is dominated by bulk shipments, AVEs are anticipated to be very low (i.e., circa 0.1%).

For red-meat, the probability-based NTM AVEs for UK imports from Canada are based on 10% physical checks, which is lower than the default of 15%. This is why the NTM AVEs are somewhat lower for Canada than they are for Australia. The primary research will further examine the assumptions underpinning the preliminary NTM estimates as these are chiefly based on the cost estimates derived from the desk-based research, summarised above.

Note that a more detailed overview of the NTM estimates and the associated assumptions will be provided in detail as part of the final report deliverables.

Table III-5: Preliminary NTM AVEs for Selected Products for UK-Canada (CA) Trade

	5: Preliminary NTM AVES TO	Prices (£/To		UK Imports		UK Exports	to CA
HS Code	Product Description	CA-UK	UK-CA	Checked	Probability	Checked	Probability
020130	Chilled boneless beef	4,203	4,840	8.6%	0.8%	8.4%	1.8%
020230	Frozen boneless beef	3,804	2,220	4.8%	0.9%	8.0%	3.9%
020110	Chilled beef carcases/half-carcases	6,336	2,171	7.5%	0.6%	13.6%	4.1%
Beef	Sub-total	4,169	3,890		1.5%		2.6%
020410	Chilled lamb carcases and half-carcases	3,565	4,537	9.2%	1.0%	8.6%	2.0%
020442	Frozen sheepmeat cuts, with bone in	11,459	3,136	2.3%	0.3%	6.0%	2.8%
020422	Chilled sheepmeat cuts, with bone in	12,608	4,617	6.5%	0.4%	8.7%	2.1%
020443	Frozen boneless sheepmeat	6,936	4,135	3.1%	0.5%	4.8%	2.2%
020423	Chilled boneless sheepmeat	4,958	5,947	7.6%	0.7%	7.5%	1.5%
Sheep	Sub-total	10,037	4,079		0.9%		2.3%
040690	Cheese (excl. fresh cheese, incl. processed and bluevein cheese)	4,398	3,784	3.3%	0.7%	3.9%	1.3%
040610	Fresh cheese (unripened or uncured cheese)	3,334	2,819	4.1%	0.9%	4.9%	1.7%
040510	Butter (excl. dehydrated butter and ghee)	2,435	3,390	5.1%	1.2%	4.2%	1.4%

040590	Fats and oils derived from milk, (excl. natural & other butter)	3,335	4,492	4.1%	0.9%	3.5%	1.1%
Dairy	Sub-total	4,078	3,713		1.2%		1.3%
100199	Wheat (excl. seed)	184	167	1.1%	0.1%	1.1%	0.1%
100390	Barley (excl. seed)	176	157	1.1%	0.1%	1.1%	0.1%
070110	Seed potatoes	306	517	18.5%	7.5%	13.6%	5.0%
070190	Potatoes (fresh, excl. seed)	417	336	19.0%	4.2%	22.8%	5.3%
Potatoes	Sub-total	404	357		4.6%		5.3%

Sources: UN Comtrade, HMRC and The Andersons Centre (2022)

3.4 UK-GCC

As the GCC countries are not noted exporters of agricultural produce, particularly in terms of the UK, the focus of this section is on the NTM costs associated with exporting from the UK to the Gulf. As noted in the Evidence Review, in contrast to the EU, the GCC is a much looser trading bloc. Often, trade deals with GCC countries are done on a bilateral basis (e.g., Saudi Arabia and the UAE do separate trade deals). Accordingly, there is scope for differences in border control measures imposed by GCC countries. For this study, the NTMs assessment has primarily focused on Saudi Arabia as it is the largest GCC economy. Some additional insights are also provided for the UAE as it too has significant trade with the UK.

3.4.1 Exporting to the GCC – Key Requirements

General Requirements

- **Customs:** a customs declaration (Bill of Entry) needs to be provided to the Saudi customs authority via the FASAH platform³⁹. Whilst it has not been possible to get a definitive estimate of the customs declaration cost, which can be submitted by a customs agent, Aramex suggests that customs clearance for Saudi Arabia costs US\$75 (£58) per shipment submitted to customs authorities⁴⁰. Admittedly, this is for exports from Saudi Arabia but similar fees for imports are also likely to apply.
- Comply with national legislation and food standards: it is stipulated that any food item imported must meet the regulations and standards applied by the country in question whether that be the Kingdom of Saudi Arabia (KSA) or the UAE. For Saudi Arabia, these general import and technical requirements are setout by the Saudi Food & Drug Authority (SFDA)⁴¹. Similar requirements are in place for other GCC countries.
- **Register as an exporter:** for Saudi Arabia, this must be done by creating an account with the SFDA and registering the food items to be imported via its Food Import Registration System (FIRS)⁴².
- **Certificate of Origin:** this is unsurprisingly required, as it is for most countries involved in international trade⁴³.
- **Certificate of Conformity:** this can be required in some cases but for most products within the scope of this study this requirement should be circumvented via a Health Certificate (see below).

Key Requirements – Meat

The following requirements are based on the SFDA's Food Clearance Conditions and Requirements⁴⁴.

- **Plant approval:** the SFDA requires that products of animal origin can only be imported from approved establishments. This means that in addition to a country (e.g., UK) getting approval for export to Saudi Arabia, individual plants also require approval.
- **Health Certificate:** a copy is required upon entry into Saudi Arabia. This can be issued by competent authorities in the UK and must attest that the meat has been handled in accordance with Sharia law⁴⁵. Based on input received from a few companies involved in the certification of meat products for export, the costs tend to typically be in the £300 to £400, with an 'average' of around £350 per shipment. However, it was also pointed out by these companies that certification costs could also be significantly higher (up to £1,000) if there were a number of products (SKUs) in one load. For this study, £350 per load is assumed and this figure will be tested further during the primary research.
- **Halal Certificate:** whilst the Saudi Health Certificate asks certifiers to verify that slaughtering has conformed to Halal requirements, a separate Halal Certificate is also required. Based on input received during this study, Halal Certificates are estimated to cost between £48-53 per unit, although different pricing models are also used (e.g. general Halal certification for 1-3 years' validity). Halal certification is also a requirement in other GCC countries.
- **Certificate of Halal Slaughter:** this is also cited as a requirement by the SFDA.
- **Physical checks and sampling:** these also take place for meat products imported into Saudi Arabia. The SFDA reserves the right to take laboratory samples of imported meat shipments and that the importers have to bear the cost of such samples.
- **Labelling:** whilst there are requirements around nutritional information and other labelling requirements, the SFDA states that any quality claims being made on the label (e.g., organic produce) will require proof that such claims are valid.

Key Requirements - Dairy

The SFDA's requirements for dairy products are broadly the same as those for meat with the exception that Halal certification is not required for dairy products.

Key Requirements - Grain

Again, the aforementioned Food Clearance Conditions and Requirements document from the SFDA detail the key phytosanitary-related requirements that must be complied with including;

- **Phytosanitary certificate:** a copy of a phytosanitary certificate is required for the import of cereals, agricultural crops and fresh fruit and vegetables into Saudi Arabia.
- **Proof of quality:** this is required if there is a claim made on the product/shipment label. Other quality claims such as being organic produce must also be provided.

Key Requirements - Potatoes

As with cereals, a phytosanitary certificate copy is required. Importation is only permitted from approved establishments and the exporting countries also need to be approved.

Other GCC Countries

According to the USDA GAIN Report on Food and Agricultural Import Regulations and Standards for the UAE⁴⁶, the certification requirements are broadly similar to those for Saudi Arabia. The corresponding GAIN Report for Qatar⁴⁷ also shows broadly certification requirements. In view of this, the requirements for Saudi Arabia are considered to be a proxy for the GCC bloc as a whole.

3.4.2 Detailed NTM AVE Estimates

As UK trade with GCC countries is currently based on WTO Most-Favoured Nation (MFN) conditions, the preliminary NTM estimates presented below are based on the higher end of the NTM costs spectrum vis-à-vis the estimates presented for NZ and Canada who benefit from veterinary deals with the UK. Where information is as yet unavailable for the GCC (e.g., physical check rates), the check rates applicable for import into the UK, once its Border Operating Model is fully functional, are assumed to apply for exports from the UK to the GCC. Accordingly, these estimates (see Table III-6) need to be treated with caution.

Table III-6: NTM AVEs for Selected Products for UK-GCC Trade

	Product (Short	Prices (£/T	onne)	UK Import	s from GCC	UK Exports	s to GCC
HS Code	Description)	GCC-UK	UK-GCC	Checked	Probability	Checked	Probability
020130	Chilled boneless beef	2,600	4,840	31.7%	5.5%	25.4%	5.4%
020230	Frozen boneless beef	2,941	2,220	11.8%	4.7%	12.3%	7.6%
020110	Chilled beef carcases/half-carcases	2,320	2,171	33.1%	6.2%	34.4%	9.9%
Beef	Sub-total	2,929	3,074		4.7%		7.2%
020410	Chilled lamb carcases and half-carcases	1,447	4,537	40.5%	9.6%	25.7%	5.7%
020442	Frozen sheepmeat cuts, with bone in	3,426	3,136	10.5%	4.0%	9.3%	5.4%
020422	Chilled sheepmeat cuts, with bone in	5,164	4,617	26.5%	3.2%	25.8%	5.9%
020443	Frozen boneless sheepmeat	2,109	4,135	15.7%	6.5%	7.6%	4.2%
020423	Chilled boneless sheepmeat	4,899	5,947	25.8%	3.1%	23.9%	4.8%
Sheep	Sub-total	2,684	4,282		5.9%		5.5%
040690	Cheese (excl. fresh cheese, incl. processed and bluevein cheese)	3,083	3,784	7.5%	2.4%	6.8%	2.3%
040610	Fresh cheese (unripened or uncured cheese)	2,340	2,819	9.2%	3.1%	8.4%	3.0%
040510	Butter (excl. dehydrated butter and ghee)	3,519	3,390	6.8%	2.1%	7.3%	2.5%

040590	Fats and oils derived from milk, (excl. natural & other butter)	5,103	4,492	5.4%	1.5%	6.1%	1.9%
Dairy	Sub-total	3,140	3,536		2.5%		2.5%
100199	Wheat (excl. seed)	708	167	5.3%	0.1%	5.3%	0.1%
100390	Barley (excl. seed)	580	157	5.3%	0.1%	5.3%	0.1%
070110	Seed potatoes	474	517	21.6%	6.3%	22.1%	7.2%
070190	Potatoes (fresh, excl. seed)	327	336	35.6%	7.2%	37.0%	8.8%
Potatoes	Sub-total	329	380		7.2%		8.4%

Source: The Andersons Centre (2022)

Note: Estimates are preliminary only and must be treated with caution.

References

¹ See: https://data.gov.uk/dataset/19890572-14b6-4d37-8a6d-6a5ec3b457fe/most-favoured-nation-mfn-rates-to-trade-with-the-uk-from-1-january-2021

² See: https://www.gov.uk/government/publications/reference-documents-for-the-customs-tariff-quotas-eu-exit-regulations-2020

³ See: https://www.gov.scot/publications/analysis-brexit-scenario-impacts-scottish-agricultural-sectors/documents/

⁴ See: https://www.awe.gov.au/sites/default/files/documents/departmental-charging-guidelines-2021.pdf

⁵ See: https://www.legislation.gov.au/Details/C2021C00141

⁶ See: https://www.abf.gov.au/importing-exporting-and-manufacturing/exporting/how-to-export/export-declaration

⁷ See: https://www.aigroup.com.au/services-and-advice/international-trade/Certificates-of-Origin/

⁸ See: https://www.mpi.govt.nz/export/food/meat/steps-to-exporting-meat/

⁹ See:

https://www.legislation.govt.nz/act/public/1999/0093/latest/DLM33502.html?search=ts_all%40act%40bill%40regulation_Animal+Products+Act+1999_resel&p=1&sr=1

¹⁰ See: https://www.mpi.govt.nz/food-business/food-act-2014/

¹¹ See: http://www.foodstandards.govt.nz/code/Pages/default.aspx

¹² See:

https://www.legislation.govt.nz/regulation/public/2021/0285/latest/whole.html

¹³ See: https://www.mpi.govt.nz/export/food/meat/fees-and-charges-for-exporting-meat/

¹⁴ See: https://www.customs.govt.nz/business/export/start-exporting/

¹⁵ See: https://www.customs.govt.nz/about-us/about-customs/goods-clearance-fees/

¹⁶ See: https://www.nzmeatboard.org/quotas/fees/

¹⁷ See:

https://www.legislation.govt.nz/regulation/public/2007/0130/latest/DLM437410.html

¹⁸ See: https://www.mpi.govt.nz/export/food/meat/steps-to-exporting-meat/4-register-for-e-cert-for-meat-exports/

¹⁹ See: https://www.mpi.govt.nz/dmsdocument/4486-Animal-Products-Notice-Electronic-Certification-System-Costs-Non-dairy-Animal-Product-Industry

See: https://www.mpi.govt.nz/export/food/meat/fees-and-charges-for-exporting-meat/

²¹ See: https://www.mpi.govt.nz/export/food/meat/fees-and-charges-for-exporting-meat/

²² See:

https://www.legislation.govt.nz/regulation/public/2015/0095/latest/DLM6466098.html

²³ See: https://www.mpi.govt.nz/export/food/dairy/steps-to-exporting/1-meet-newzealand-requirements-for-dairy-exports/ ²⁴ See: https://www.legislation.govt.nz/regulation/public/2015/0095/latest/whole.html#DLM 6444706 ²⁵ See: https://www.sasa.gov.uk/seed-ware-potatoes/potato-imports ²⁶ See: https://potatoesnz.co.nz/exporting/ ²⁷ Accessible via: https://potatoesnz.co.nz/administration/annual-reports/ ²⁸ See: https://www.mpi.govt.nz/export/food/fruit-and-vegetables/fees-and-chargesfor-exporting-fruit-and-vegetables/ ²⁹ See: https://www.canada.ca/en/revenue-agency/cracanada.html?utm campaign=notapplicable&utm medium=redirect&utm source=cra-arc.gc.ca redirect ³⁰ See: https://www.cbsa-asfc.gc.ca/services/cb-cd/cb-cd-eng.html ³¹ See: https://inspection.canada.ca/about-cfia/acts-and-regulations/list-of-acts-and- regulations/cfia-fees-notice/eng/1582641645528/1582641871296#c2 ³² See: https://inspection.canada.ca/animal-health/terrestrial- animals/imports/import-policies/animal-products-and-byproducts/framework/framework/eng/1616507117282/1616507282914#s6c10 33 See: https://inspection.canada.ca/importing-food-plants-or-animals/foodimports/food-specific-requirements/importing-meatproducts/eng/1545799257612/1545799287057#pecp ³⁴ See: https://inspection.canada.ca/food-labelrequirements/labelling/industry/meat-and-poultryproducts/eng/1393979114983/1393979162475 ³⁵ See: https://inspection.canada.ca/food-label-requirements/labelling/industry/foodlabelling-requirements-checklist/eng/1393275252175/1393275314581 ³⁶ See: https://inspection.canada.ca/plant-health/invasivespecies/directives/potatoes/d-98-01/eng/1312247584545/1312247683833#a1 ³⁷ See: https://laws-lois.justice.gc.ca/eng/acts/S-8/ ³⁸ See: https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1400/index.html ³⁹ See: https://www.customs.gov.sa/en/Individuals-services ⁴⁰ See: https://www.aramex.com/gb/en/support/customs-clearance/country-search- results?country=SA ⁴¹ See: https://www.sfda.gov.sa/sites/default/files/2021-12/SFDA78987e.pdf ⁴² See: https://www.sfda.gov.sa/sites/default/files/2021-11/SFADFgdfg_1.pdf ⁴³ See: https://www.sfda.gov.sa/sites/default/files/2021-11/SFADFqdfq 1.pdf

⁴⁴ See: https://www.sfda.gov.sa/sites/default/files/2021-11/SFADFgdfg_1.pdf
https://www.sfda.gov.sa/sites/default/files/2021-12/SFDA78987e.pdf

⁴⁶ See:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20Import%20Regulations%20and%20Standards%20Export%20Certificate%20Report Dubai United%20Arab%20Emirates 09-30-202147 See:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Qatar%20FAIRS%20Export%20Certificate%20Report%202020 Dubai Qatar 08-10-2020