



Department  
for Environment  
Food & Rural Affairs



### **Operational Border Target Operating Model information**

New import controls were implemented on 30 April 2024. This email gives you operational information updates on BTOM.

It includes:

- Preparing your load for inspection and getting it right at Sevington
- Moving high-risk food and feed not of animal origin at the Short Straits
- HRFNAO – definition and processing
- Frozen fish fingers risk categorisation
- How to avoid ‘no match’
- Resources to help you comply with new BTOM rules
- Contact points for urgent border target operating model (BTOM) queries

### **Preparing your load for inspection and getting it right at Sevington**

There are a number of things you can do to help reduce the amount of time your goods will spend at a Border Control Post (BCP).

Place goods that have high inspection rates at the back of the load, immediately in front of the doors, so they can be accessed quickly and easily. If we need to remove other pallets of goods, to access goods for inspection, this may result in a delay.

If your driver is sent to Sevington Inland Border Facility, they will need to tell the staff at the front booths that they are carrying import goods and are there for a Defra/Border Control Post (BCP) Sanitary and Phytosanitary (SPS) check and present the Goods Movement Reference (GMR) to the staff at the front booths. Where possible, drivers should also carry and present the CHED reference number. Staff will then direct you to the Border Control Post (BCP) part of the site, to enable a Sanitary and Phytosanitary (SPS) check on the goods to take place. Doing this will avoid the delay associated with incorrectly being directed to the HMRC part of the site, before being redirected to the BCP.

To find out which plants and plant products are more likely to be stopped for inspection, visit our [Plant Health Portal](#)

### **Moving high-risk food and feed not of animal origin at the Short Straits**

The Western Dock at the Port of Dover is for deep sea cargo goods from the rest of the world. The Border Control Post (BCP) situated at the Western Docks is the designated BCP for high-risk food and feed not of animal origin at ambient temperature from specific countries arriving as cargo at the cargo port. When creating the CHED import notification in IPAFFS, select Dover West (Deep Sea Terminal) - GBDOV2P in the 'Entry border control post' field (Transport to the BCP section).

All high-risk food and feed not of animal origin arriving at the RORO Ferry Terminal at the Eastern Dock, will be assigned to Sevington BCP for eligible checks. When creating the CHED import notification in IPAFFS, select Sevington BCP – GBSEV25 in the 'Entry border control post' field (Transport to the BCP section).

If the point of entry changes, you must also update the CHED, using IPAFFS. You can do this if the CHED status on the IPAFFS dashboard is Draft, NEW or AMEND.

If the CHED status is IN PROGRESS you will not be able to change it and should contact the Port Health Authority at the BCP you originally selected in the CHED to ask them to set the status to AMEND.

### **HRFNAO – definition and processing**

Any high risk food and feed not of animal origin (HRFNAO) imported into the EU, cleared for free circulation in the EU and re-exported to Great Britain is considered high-risk.

This includes, but is not limited to peanuts, dried grapes and herbs such as coriander and basil. For a more complete list of HRFNAO products please see [Implementing regulation - 2021/608 - EN - EUR-Lex \(europa.eu\)](#).

HRFNAO that is imported into the EU remains a product of the country of origin unless it is processed in the EU. In terms of food law 'processing' means any action that substantially alters the initial product. Processing includes: heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes. Examples of 'unprocessed products' include (but are not limited to): divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.

You can watch a [short presentation on importing HRFNAO](#) or read the [Import high risk food and feed of non-animal origin from the EU to Great Britain](#) on GOV.UK and the Food Standards Agency guidance on [Importing high-risk food and feed of non-animal origin into GB](#).

### **Frozen fish fingers risk categorisation**

We have received questions about the risk categorisation of frozen fish fingers. They are considered low risk if made with wild caught fish. Please note this is not a change to any risk categorisations.

The BTOM risk category list by commodity code states, CN1604199190 is fillets of other fish species - raw, merely coated with batter or breadcrumbs, whether or not pre-fried in oil, frozen. Wild caught fish is defined by the following risk categorisation. A wild caught fishery product will be in the low BTOM risk category if it meets all the following criteria:

- it is not live or would be unable to survive if returned to the environment ('not viable')
- it comes from an approved establishment and is identified accordingly
- it has not been subject to processing, as defined in Article 2 of Retained EU Regulation 852/2004 – for example, by heating, curing, smoking, maturing, drying, marinating, extraction, extrusion or a combination of these
- it is accompanied by the required illegal, unreported and unregulated (IUU) documents, for example, a valid catch certificate and proof of storage and processing, where applicable
- it is not fish that is associated with histamine (that is, species of the families Scombridae, Clupeidae, Engraulidae, Coryfenidae, Pomatomidae or Scombrosidae)

### **How to avoid ‘no match’**

To help you avoid delays to your consignments Defra and HMRC have produced a [step-by-step video](#) and technical information sheets and on how to [prevent](#) and [resolve](#) a ‘no match’ in the Customs Declaration Service (CDS). Defra and HMRC cross-check information provided by importers in their Part I CHED and customs declaration to ensure the CHED reference and commodity code are consistent. Any mismatches between this data will result in consignments being directed to a BCP for further checks.

### **Resources to help you comply**

Our detailed guidance has been updated with information on how to comply with your new legal responsibilities for:

[importing live animals and animal products to Great Britain](#)

[importing plants and plant products from the EU to Great Britain](#)

[importing plants and plant products from non-EU countries to Great Britain](#)

Read our [Leaflets to help businesses prepare for a new approach to importing goods to GB under the BTOM.](#)

Visit our YouTube channel and [watch recordings of our previous webinars for traders.](#)

### **Contact points for urgent border target operating model (BTOM) queries**

Any urgent BTOM/import queries for plants and plant products across England and Wales should be directed to the Animal and Plant Health Agency (APHA), by email, in the first instance: [phsi-importers@apha.gov.uk](mailto:phsi-importers@apha.gov.uk)

Alternatively, you can contact them by telephone: +44 (0) 3000 200 301

Any urgent BTOM/import queries for animal products should be directed to the Port Health Authority (PHA) at your nominated Border Control Post (BCP). Find your PHA contact details at your nominated BCP on [this map](#).

If you need technical help with IPAFFS you should call the Animal and Plant Health Agency (APHA) helpline on 0330 041 6999 or email [APHAServiceDesk@apha.gov.uk](mailto:APHAServiceDesk@apha.gov.uk)