



## Border Target Operating Model

Upcoming changes for Plant Products and Animal Products  
in 2024

---

# Risk Categories

With release of the Border Target Operating Model (BTOM), Plants, Plant Products, Animals, and Animal Products have all been assigned a risk category that determines what type of import border controls they are subject to.

What risk category the product is given is dependent on what type of product it is and whether it is imported from the EU or from non-EU countries.

So, it's important to consider where the product is being imported from first when identifying what risk category it may be assigned to, and what border controls it would be subject to, before importing.

Each type of product is either given a "High Risk", "Medium Risk", or "Low Risk" category. Different import border controls apply to each risk category and phasing in of changes to these border controls are taking place on 31<sup>st</sup> January 2024, 30<sup>th</sup> April 2024, and 31<sup>st</sup> October 2024.

From 31<sup>st</sup> January 2024, full customs controls and requirements for pre-notification and certificates will be required for products moving from Ireland to Great Britain.

We will explore what these changes are, and how they might affect your business, in the rest of this document. A summary of events will be given at the end.

## BTOM risk categories for animal and animal product imports from the EU to Great Britain

<https://www.gov.uk/government/publications/risk-categories-for-animal-and-animal-product-imports-to-great-britain/target-operating-model-tom-risk-categories-for-animal-and-animal-product-imports-from-the-eu-to-great-britain>

## BTOM risk categories for animal and animal product imports from non-EU countries to Great Britain

<https://www.gov.uk/government/publications/risk-categories-for-animal-and-animal-product-imports-from-non-eu-countries-to-great-britain/tom-risk-categories-for-animal-and-animal-product-imports-from-non-eu-countries-to-great-britain-summary-tables>

## BTOM risk categorisations for plants and plant product imports from the EU to Great Britain

<https://planthealthportal.defra.gov.uk/trade/imports/target-operating-model-tom/tom-risk-categorisations>

## BTOM risk categorisations for plants and plant product imports from non-EU countries to Great Britain

<https://planthealthportal.defra.gov.uk/trade/imports/imports-from/tom-risk-categories-from-non-eu-countries/>

---

# Plants and Plant Products

Plants and Plant Products can fall into different risk categories whether they are imported from the EU or imported from non-EU countries.

For example, asparagus imported from non-EU countries is considered Medium Risk whereas asparagus imported from the EU is only considered Low Risk.

This is where it is important to know where the product is being imported from before checking what risk category it might fall under. Different controls could apply to the same product depending on where it is imported from.

The “Low Risk” category essentially contains all plants and plant products that are not otherwise prohibited, High Risk or Medium Risk.

## Imports from the EU

### High Risk

The High Risk category of plants and plant products imported from the EU are what have been considered “High Priority Plants and Plant Products” which have been subject to the same border controls as imports from non-EU countries from January 2021.

Those being the requirements for a Phytosanitary Certificate, import pre-notification on IPAFFS/PEACH, identity checks, and physical inspections.

The type of products that fall under the High Risk category are:

- All plants for planting
- Seed potatoes and ware potatoes
- Seeds of certain plants
- Cuttings/branches of conifer over 3m
- Isolated barks of certain plants and trees
- Wood of certain plants and trees
- Machinery and vehicles used for agricultural or forestry purposes

There will be no changes to border controls for High Risk products imported from the EU in January.

However, from 30<sup>th</sup> April 2024, the existing inspection procedure will move from current Place of Destination (POD) to Border Control Posts (BCP). All imports of High Risk plants and plant products must then be imported via a port that has a BCP that can facilitate the type of product.

### Medium Risk

The Medium Risk category of plants and plant products imported from the EU are what have been considered “Regulated and Notifiable”.

---

These have been subject to requirements for import pre-notification on IPAFFS/PEACH. A phytosanitary certificate had not been required.

The type of products that fall under the Medium Risk category are:

- Parts of certain plants, other than fruits and seeds of
- Certain cut flowers
- Certain seeds

From 31<sup>st</sup> January 2024, Medium Risk plants and plant products from the EU will need to have an accompanying phytosanitary certificate.

From 30<sup>th</sup> April 2024, Medium Risk plants and plant products from the EU will also be subject to risk-based identity and physical checks.

### Low Risk

The Low Risk category of plants and plant products imported from the EU are anything that are not prohibited or not previously mentioned in High Risk or Medium Risk categories.

Examples include all fruits and vegetables (other than seed or ware potatoes), cut flowers (other than those mentioned in Medium Risk), and woods (other than those mentioned in High Risk)

From 31<sup>st</sup> January 2024, Low Risk plants and plant products from the EU will continue to not require a phytosanitary certificate at import. The requirement for an import pre-notification on IPAFFS/PEACH will also be removed.

There is also a list of unregulated plants and plant products that are not subject to plant health controls. Examples include pineapple, kiwi, citrus fruits, any fruit and vegetables that have been processed and packaged, and composite products (products containing both plant products and animal products).

## Imports from non-EU countries

### High Risk

The High Risk category of plants and plant products imported from non-EU countries contains similar products as those in the High Risk category for imports from the EU.

The type of products that fall under the High Risk category are:

- All plants for planting
- Seed potatoes and ware potatoes
- Seeds of certain plants
- Cuttings/branches of conifer over 3m
- Isolated barks of certain plants and trees
- Wood of certain plants and trees
- Machinery and vehicles used for agricultural or forestry purposes

---

High Risk plants and plant products from non-EU countries will continue to have the same border control requirements as they do now. These include phytosanitary certificates and import pre-notifications.

### Medium Risk

The Medium Risk category of plants and plant products imported from non-EU countries expands on the Medium Risk category of imports from the EU.

This category also includes:

- Certain grains
- Expanded selection of parts of plants, other than fruit and seeds of
- Expanded selection of cut flowers
- Expanded selection of seeds
- Certain fruits and vegetables

The addition of certain fruits and vegetables is possibly the biggest consideration as these would fall under the Low Risk category on imports from the EU. Examples that are included in Medium Risk on imports from non-EU countries include watermelons, asparagus, carrots, and onions.

Medium Risk plants and plant products from non-EU countries will continue to have the same border control requirements as they do now. These include phytosanitary certificates and import pre-notifications.

### Low Risk

The Low Risk category of plants and plant products imported from non-EU countries are anything that are not prohibited or not previously mentioned in High Risk or Medium Risk categories.

From 31<sup>st</sup> January 2024, Low Risk plants and plant products from non-EU countries will continue to have the same border control requirements as they do now. These include phytosanitary certificates and import pre-notifications.

However, from 30<sup>th</sup> April 2024 there will be a removal of the requirement for phytosanitary certificates for Low Risk plants and plant products from non-EU countries.

This will align more with the border controls for Low Risk plants and plant products import from the EU. However, import pre-notification on IPAFFS/PEACH will still be required for traceability.

Although not all products in the Low Risk list for EU imports are on the Low Risk list for non-EU imports.

For example, a watermelon imported from the EU is Low Risk and will have no phytosanitary certificate or import pre-notification requirement.

If the watermelon was instead imported from a non-EU country, then it is considered Medium Risk and must have a phytosanitary certificate and import pre-notification.

---

# Animals and Animal Products

Similarly, Animals and Animal Products have also been given a High, Medium, or Low Risk category which depends on whether they have been imported from the EU or from non-EU countries.

For imports from non-EU countries, they must firstly be listed as imported from a 'permitted country' for the type of product being imported.

This list of what products can be imported from 'permitted countries' can be checked on <https://www.data.gov.uk/dataset/b92627b0-dd7b-4e1d-ba36-e25424f55eeb/non-eu-countries-approved-to-export-animals-and-animal-products-to-great-britain>

For example, Ghana is not listed as a 'permitted country' on the list for Milk and Milk Products. That means all imports of Milk and Milk Products from Ghana are prohibited.

Canada is listed as a 'permitted country' on the same list, so milk for human consumption would be Medium Risk, or Low Risk if shelf stable at ambient temperature and sterilised.

## Imports from the EU

### High Risk

Only live animals (including live aquatic animals), bees, and germinal products (including hatching eggs) are considered High Risk when importing from the EU.

Consignments of High Risk category products are already subject to physical import checks. These checks will continue after 31<sup>st</sup> January 2024. An Export Health Certificate (EHC) issued by the competent authority in the country where the goods originate and import pre-notification on IPAFFS will also be required.

### Medium Risk

Some examples of Medium Risk animal products from the EU include:

- Milk for human consumption
- Eggs for human consumption
- Egg products for human consumption which are preserved at frozen or chilled temperatures
- Poultry meat and poultry meat products for human consumption
- Untreated animal hides and skins
- Animal By Products (ABP) for the manufacture of pet food

From 31<sup>st</sup> January 2024, these Medium Risk animal products imported from the EU will require an Export Health Certificate and import pre-notification on IPAFFS.

From 30<sup>th</sup> April 2024, they will also need to enter through a BCP that can facilitate that type of product and may also be subject to documentary, identity, and physical import checks.

---

## Low Risk

Some examples of Low Risk animal products include:

- Products of Animal Origin that are shelf stable at ambient temperatures (if certain criteria are met)
- Composite products
- Gelatine and collagen
- Honey
- Treated hides and skins (excluding items that are subject to any import restrictions)
- Canned pet food

From 31<sup>st</sup> January 2024, Low Risk animal products imported from the EU will not require an Export Health Certificate but will still require an import pre-notification on IPAFFS.

From 30<sup>th</sup> April 2024, they will also need to enter through a BCP that can facilitate that type of product. Any documentary, identity, or physical checks will only be undertaken where intelligence indicates a specific risk.

## Imports from non-EU countries

The risk categories for non-EU countries does not apply to every country. Only those that have been subject to risk assessment are considered 'permitted countries' for the import of animals and animal products.

The 'permitted countries' are: Argentina, Australia, Botswana, Brazil, Canada, Chile, China, Ecuador, India, Israel, Japan, Namibia, New Zealand, Nicaragua, Singapore, South Africa, South Korea, Thailand, Türkiye, Ukraine, United States, Uruguay, and Vietnam.

Not all 'permitted countries' are allowed for the import of every animal and animal product. So, the specific lists should be checked in each instance.

## High Risk

Like with imports from the EU, the only High Risk category products are live animals (including live aquatic animals), bees, and germinal products (including hatching eggs).

High Risk animals and animal products imported from non-EU countries will continue to require import pre-notification on IPAFFS and an Export Health Certificate at import. These products will continue to be subject to documentary, identity, and physical import checks.

## Medium Risk

The Medium Risk category goods list for imports from permitted non-EU is similar to those on the Medium Risk category for import from the EU. The difference is that some goods may be Medium Risk if imported from some permitted non-EU countries, but may be Low Risk if imported from other permitted non-EU countries, or if certain conditions apply.



---

An example of this is that poultry meat and poultry meat products for human consumption are considered Medium Risk for all permitted non-EU countries. However, they can be considered Low Risk if they are shelf stable at ambient temperature and sterilised.

Conversely, honey is considered Medium Risk for most permitted non-EU countries, but Low Risk if imported from Argentina, Brazil, Canada, Chile, India, New Zealand, Ukraine, United States, Uruguay, and Vietnam.

Medium Risk animals and animal products imported from permitted non-EU countries will continue to require import pre-notification on IPAFFS and an Export Health Certificate at import. These products will continue to be subject to documentary, identity, and physical import checks.

From 30<sup>th</sup> April 2024, there will be a reduction in the physical and identity check on Medium Risk animal products from permitted non-EU countries.

### Low Risk

Similarly, most goods in the EU Low Risk category are also considered Low Risk for imports from permitted non-EU countries.

Although, like we've seen with honey above, they might only be considered Low Risk for some permitted non-EU countries and Medium Risk for the remaining permitted non-EU countries. Or they may have been moved to Medium Risk for all permitted non-EU countries.

From 31<sup>st</sup> January 2024, Low Risk animal products imported from permitted non-EU countries will still require an import pre-notification and Export Health Certificate at import.

From 30<sup>th</sup> April 2024, these products will not require an Export Health Certificate at import and the routine checks will also be removed. Import pre-notification on IPAFFS will still be required.

## Summary of timeline

### 31<sup>st</sup> January 2024

#### Phytosanitary Certificates

- Not required for Low Risk Plants and Plant Products imported from the EU.
- Introduced for Medium Risk Plants and Plant Products imported from the EU.
- Continued to be required for High Risk Plants and Plant Products imported from the EU, and for all risk categories imported from non-EU countries.

#### Export Health Certificates

- Not required for Low Risk Animals and Animal Products imported from the EU.
- Introduced for Medium Risk Animals and Animal Products import from the EU.
- Continued to be required for High Risk Animals and Animal Products imported from the EU, and for all risk categories imported from permitted non-EU countries.



---

### Import Pre-notification

- No longer required for Low Risk Plants and Plant Products from the EU
- Continued to be required for:
  - Medium Risk and High Risk Plants and Plant Products imported from the EU.
  - All risk categories of Plant and Plant Products imported from non-EU countries.
  - All risk categories of Animals and Animal Products imported from the EU and permitted non-EU countries.

### Ireland

- Introduction of full customs controls and pre-notification requirements (except for Low Risk Plants and Plant Products)

## 30<sup>th</sup> April 2024

### Phytosanitary Certificates

- No longer required for Low Risk Plants and Plant Products from non-EU countries.

### Export Health Certificates

- No longer required for Low Risk Animal Products from permitted non-EU countries.

### Identity and Physical Checks

- Introduced for Medium Risk Animal Products from the EU.
- Introduced for Medium Risk Plants and Plant Products from the EU.
- Reduced for Medium Risk Animal Products from permitted non-EU countries.
- Removed for Low Risk Animal Products from permitted non-EU countries.
- Removed for Low Risk Plants and Plant Products from non-EU countries.

### Border Control Posts

- All Plants and Plant Products must enter Great Britain through a BCP that can facilitate the type of product.
- All Animals and Animal Products must enter Great Britain through a BCP that can facilitate the type of product.

## 31<sup>st</sup> October 2024

### Safety and Security Declarations

- Will be required for all imports into Great Britain from the EU (including Ireland) or other territories where a waiver is currently in place.

### Ireland

- Introduction of documentary, identity and physical checks on Medium Risk Animal Products and Medium Risk Plants and Plant Products.



Powered by people, knowledge and digital innovation