

MAC ADVICE

Import of live unpurified bivalve molluscs from the United Kingdom

Brussels, 14 April 2021

1. Background

Since the 1 January 2021, due public health reasons, the EU does not allow the import of live bivalve molluscs (mussels, cockles, oysters, clams, scallops, among others) from the UK harvested in production areas classified as health zones B for purification in EU member states. This is because of the UK's third country status since Brexit, which means that the purification treatment of live bivalves molluscs must take place prior to the departure of the product from the UK.

Up to 31 December 2020, there was a significant trade of live bivalves molluscs from the UK, which were purified in approved EU purification centres before packaging for final marketing. This economic exchange was possible due to the intra-communitary registration document. This is a traceability certificate, which includes information about the producer, the production area, and the relaying and/or purification steps, if any. In recent years, there have been no known problems regarding the importing and marketing of these products into the EU.

2. Current difficulties

The majority of shellfish growing areas in the UK are classified as B health zones and UK export companies are presently neither equipped with purification systems of sufficient capacity, nor do have the technical knowledge, to handle the volume of exports. On the other hand, EU importers have made significant investments over the years into this equipment and also have the know-how to ensure this process is carried out optimally.

With the new relationship between the EU and the UK both sides are facing important technical and financial difficulties. For UK companies, as well as a steep learning curve, there are significant investment costs to purify and package shellfish to comply with EU regulations. Costs are estimated to be around £ 1 million per company. For EU companies, imported purified bivalve molluscs have a lower survival rate than unpurified shellfish. These cannot be re-immersed in the EU without a modification in the purification plants to disinfect the effluent waters. It denies the EU companies the purification work that translates into jobs and the acquisition of added value within the EU. Long-term, UK companies, could go directly to EU market competing directly against EU purification plants. Therefore, the result is that the development of this new “modus operandi” is actually detrimental to EU importers of shellfish products, as it increases costs, decreases the quantity and quality of imported products.

3. Recommendation

To ensure continued provision of high-quality imported shellfish products into the EU market, as well as the creation of added value and jobs, the Market Advisory Council believes that the European Commission should re-examine the trade of imported class B live bivalves and molluscs from the UK into the EU. The current difficulties can be described as unforeseen effect of Brexit where companies both in the EU and in the UK will suffer from the negative impact of the situation. The Commission should consider allowing the import of unpurified live bivalves and molluscs from class B waters from the UK into approved purification centres in Member States, as was established practice before the withdrawal of the UK from the EU.