



CC(19)2563:1 – FG/jg

Mr John Watson
Director
Single Market and Connectivity
Secretariat General
BERL Building
BE – 1049 Brussels

Brussels, 28th March 2019

Dear Mr Watson,

Copa and Cogeca, CELCAA and FoodDrinkEurope, on behalf of the entire EU agri-food chain, would like to commend the European Commission's preparation for a "no-deal Brexit".

We acknowledge that given the continued uncertainty surrounding the ratification process on the side of the United Kingdom, the Commission has proceeded swiftly with the implementation of its contingency planning.

In a joint letter sent to the EU Chief Negotiator, Mr Barnier, on 6th February, Copa and Cogeca, CELCAA and FoodDrinkEurope jointly requested a full list of contingency measures specific to the agri-food sector intended to mitigate the potential dramatic economic consequences of a no-deal Brexit. Please find [here](#) a copy of this letter, with the measures above-mentioned in annex.

While some of our proposals have been considered, some actions would still need to be either urgently adopted or adapted in order to prevent the negative impact of a "no-deal" for our sector. Further details on these measures can be found in Annex 1.

The EU agri-food chain is supportive of the continuous coordination between the Commission and Member States at both a European and national level. However, as no-deal Brexit preparations move onto a more advanced stage – and as it is "increasingly likely"¹ the UK will leave the EU without a deal – we would appreciate enhanced coordination and communication between the representatives of our sector, the relevant Commission Directorates General and national authorities. This is essential in order to best prepare for an appropriate implementation of contingency measures while minimizing the impact this will have on the wider agri-food sector.

¹ Brexit preparedness: EU completes preparations for possible "no-deal" scenario on 12 April http://europa.eu/rapid/press-release_IP-19-1813_en.htm

In this context, we would like to invite you, along with representatives of the Member States, to meet with us at your earliest convenience in order to prepare accordingly.

We remain at your disposal should you need additional information.

Yours sincerely,



Pascale Rouhier
Celcaa Secretary General



Pekka Pesonen
Copa-Cogeca Secretary General



Mella Frewen
FoodDrinkEurope Secretary General

Copy : Philip Kermode, Sabine Julicher, Michael Niejarh, Rudolf Mögele

Annex:

In relation to customs:

- Foresee temporary facilitated procedures for EU agri-food products that would allow the goods to be cleared at the premises of the operator;
- Promote a pragmatic approach to enforcement by EU customs authorities for a determined period (e.g. 18-24 months);
- Coordinate efforts in capacity-building in Member States' customs authorities and in training for businesses, SMEs in particular, that will now operate at international level, and keep the agri-food sector informed of developments in Member States to allow for smooth transition to this new business environment.

In relation to labelling:

- Facilitate a smooth transition to label changes, by adopting temporary measures allowing for a grace period of at least 18 months, so that operators can build this into their current label update cycle and incorporate all changes at a single time.

In relation to food safety and phytosanitary requirements:

- Encourage that the UK maintains the full access to the RASFF, EUROPHYT and the Administrative Assistance and Cooperation (AAC) food fraud system: this will be mutually beneficial for the UK and the EU, as it will enable to continue this sharing of intelligence on potential food safety and phytosanitary risks as well as fraud to help protect both the EU and UK markets;
- Ensure mutual recognition of SPS certification (food safety and phytosanitary) by the EU and the UK;
- Accelerate the process for recognising UK certification bodies as a third country certification body to certify organic products for export to the EU so that this is in place ahead of 29.03.19 for continued market access;
- Ensure an uninterrupted and coordinated control of excise goods across the borders by maintaining an open access for the UK to the Excise Movement and Control System (EMCS).

In relation to transport:

- Maintain harmonization of all regulations and licenses for drivers (hours, training, requirements, etc.) and trucks (MOT, vehicle weight limits, etc.) for at least 18 months.

In relation to market disruption that will occur in agricultural markets:

- Make structural and adjustment funding available to operators and develop supporting policies to address the negative impacts arising from changes in the relationship negotiated between the EU and the UK;
- Set Emergency Brexit Funds with sufficient budget to deal quickly with any unforeseen event. Trade promotion supports should be put in place as well;
- Foresee plans for the use of market management tools, in particular private storage aids for some products;
- The Commission should take measures adapted to each specific sectors.

The impact of a no-deal will be immediate and harsh, therefore the EU agri-food chain is asking that the Commission be ready to act. Some sectors are already feeling severe market negative impacts.

Geographical indications and denominations of origins:

- These are a key pillar of the European agricultural policy and a fundamental asset for the trade of high-added value foods. In case of no-deal, and until the UK establishes its own GI scheme, EU GIs will not be protected in the UK market.
- In this framework, support from the European Commission will be needed to help GI rights holders to protect their GIs under the general trade mark legislation and/or to submit their application for GI status under the future UK GI scheme.

Coordination amongst Member States:

The agri-food sector urges the Commission to secure EU-wide solutions by encouraging Member States' coordination and support, in order to achieve similar level of preparedness among Member States to avoid trade flow distortions. In particular, in case of non-compliance at borders, the Commission should ensure a level playing field for operators in dealings with customs' officials.

The exit of the UK from the EU without a deal will constitute a lose-lose situation for the entire agri-food chain. There is therefore an urgent need for time-limited EU contingency measures to decrease business risks associated with a no-deal Brexit and the UK must be encouraged to ensure reciprocity.