

RESPONSE SUMMARY

| | |
|---------------------------------|--|
| ORIGINATING ASSOCIATION: | The Association of Ships Agents, Malta |
| ENQUIRY DETAILS: | <p><i>The local Border Inspection Post (B.I.P.) Veterinary Regulation Directorate is requesting agents here in Malta to provide the following:</i></p> <p><i>a) register as AEO's (Economic Operators) with the Veterinary Department</i></p> <p><i>b) provide Pre-notification, 72 hours prior the arrival, through Health Authorities own system INTERTRACE, of any consignment of veterinary interest.</i></p> <p><i>c) on the 7th day declare any consignment(s) by providing data for the compilation of CVED part 1 in TRACES - this will be at a cost of Eur50 per consignment to the Lines' agents</i></p> <p><i>d) declare for physical inspection by Veterinary Dept. any consignment(s) whose dwell time exceeds 20 days from original discharge - this will cost the Lines' agents approx. € 420.00)</i></p> <p><i>From what we understand the above mentioned procedures are legally binding and therefore should be followed by all EU members in accordance with regulations 97/78/EC & 136/2004.</i></p> <p><i>Can you please ask our counterparts across the EU if this is the case and, if all information is fed electronically to one focal central point/post and is then distributed to all the relevant departments (customs, health, port authorities) according to their own requirements?</i></p> <p><i>The local veterinary authorities, who give notification of each individual container which is at the local Freeport for more than 6 days, request the local agents to input manually the details of each consignment / container(s) and to compile CVED part 1 in the BIP's central system TRACES.</i></p> <p><i>We are particularly interested of how this process of pre-notification and compilation of Part 1 of the CVED is nowadays being handled (on line? via ENS or other Line system generation? manual intervention? provisions of manifests or B/L's???) by the Lines, or their representatives, in each respective transshipment port in Europe.</i></p> <p><i>We also understand that the facilitation of customs procedures with the introduction of electronic tools such as ENS (Entry Summary Declaration), amongst others (such as EXS, SDTS and SAD) have assisted to improve sanitary, phytosanitary and veterinary controls..." This goes to prove that submission (also from third countries via Lines) of pre-loading manifest data to European Customs appears to assist with the veterinary requirements from same single source data, and not separately therefrom.</i></p> |

| | RESPONSE |
|----------------|--|
| CYPRUS | <p>Cyprus no such restriction by Veterinary Authorities are imposed on cargoes of animal origin.</p> <p>The responsibility of their supervision as long as the goods in question remain within the port area under the regime of transshipment cargo for re-export lies with the Customs Authorities as it is the practice with all other transshipment cargo in containers, which have the right for their control and any inspection whatsoever on such goods.</p> |
| DENMARK | <p>We have spoken to the head of Import at MSC in Denmark. The general impression is that Danish authorities act differently than the equivalent authorities in Malta. Furthermore, the Danish Authorities have developed integrated computer systems, which appear to minimize the administrative duties as well as repeated data insertion.</p> <p>MSC gave an example with a container of Fish from a T1 area, where registration of the consignment is the first point of entry in the EU. In the MSC case it could be Felixstowe. Subsequently, the Importer together with the carrier prepares for arrival notification and the veterinary inspection is planned before arrival in Denmark.</p> <p>Replies to the questions A to D:</p> <p>A: You are not obliged to be AEO certified.</p> <p>B: There is not a distinct pre-arrival notice. The notifications are provided via the different systems, e.g. ENS and Manifest.</p> <p>C: Once the container has actually arrived at destination, customs computer system automatically provides either a Status 40: "Can be released" or Status 29: "Can be taken to storage, pending release". In this process, Veterinary inspections are planned to take place either at the consignee's premises, at a temporary storage facility or by visiting the Veterinary Authority for inspection.</p> <p>D: According to MSC this is not applicable in Denmark.</p> |
| ITALY | <p>First : Port of transshipment</p> <p>Second : port of Final destination</p> <p>Case nr.1</p> <p>Local Veterinary Office is subject to insure the respect of EU regulation 97/78/EC and 136/2044 only in case of Transshipment of goods.</p> <p>When goods of Veterinary interest are subjects to be transhipped, the</p> |

| | |
|-------------|--|
| | <p>Agent should provide to communicate some info with a FORM (as attached).</p> <p>At 7th days if goods has not yet transhipped OR loaded on vessel for the final destination, the local Agent 'll declare through TRACES SYSTEM - (shipper, consignee, type of goods etc.)</p> <p>Veterinary office requests document like invoice-pk list - and issue CVED to Agent - authorize the Shipment, and the cost of about €35 will be charge on local Agent.</p> <p>If time exceed 20th day from date of arrival, the Local Office will do Physical inspection, and the cost will be charge on account of Line' Agent, and estimates about €300.</p> <p>The cost is different port to port.</p> <p>The question is: who refund the agent of the cost sustained?? This cost remain on Owners/Agent account??</p> <p>Case nr. 2</p> <p>In case the goods arrive in Port of Destination, the Custom Agent declare through TRACES SYSTEM the consignment goods to be imported</p> <p>The expenses will be on Custom Agent or his representative account and the Line's Agent is not subject to EU regulation as above.</p> |
| NETHERLANDS | <p>Agent sends discharge manifest to Customs with additional code stating that container contains veterinary cargo.</p> <p>In case of transhipment cargo, the agent will prepare a transhipment CVED on top of the information already given via the discharge manifest. Transhipment CVED is done at local central system.</p> <p>In case of import, direct customer or forwarder will prepare CVED.</p> <p>Customs is checking, on behalf of veterinary authority, details of information provided. If OK, Customs will give 'green light' otherwise it will be taken over by veterinary authority.</p> <p>IT wise we have discussions with the authorities to combine the flow discharge manifest and transhipment CVED, but so far we have not been successful in these discussion.</p> |
| SPAIN | <p>Notification / Pre-notification periods: In the "worst" case, 48h prior the arrival of some goods with alert.</p> |

| | |
|----|---|
| | <p>In Valencia, pre-notification is being provided through the port authority's IT system, which sends directly to Health Directorate at port the customs manifests with the required information of the cargoes codes subject to check.</p> <p>From the 7th day..., you must request, on paper, the CVED part I and then, through the system TRACES of Spanish Health Ministry, the consignment details have to be introduced manually.</p> <p>As far as costs are concerned, there only exist a fee per check imposed by the Health Ministry. Enclosed you will find texts (only in Spanish) including Spanish fees, which apparently are very similar to the Maltese ones.</p> <p>For documentary check: €50.50/consignment.</p> <p>For physical check: fee varies from a minimum of €55 for consignments up to 6 tons until a maximum of €424 for consignments over 46 tons.</p> |
| UK | <p>Most of our experience with these issues is caused when cargo is diverted from Felixstowe into (say) Rotterdam and is discharged waiting for a feeder vessel. However we understand that the same rules apply for transshipment.</p> <p>To answer your queries - note all answers relate to PORT HEALTH, the cargo still needs clearing Customs at the port of destination.</p> <p>b/ - the rule is 24 hours.</p> <p>c/ - correct, if the container stays at the transshipment/diversion port from more than 7 days we have to send the original health certificates to the transshipment port (usually via the shipping line) for them to complete a CVED application. This means that the container is cleared Port Health at the transshipment/diversion port and the stamped CVED goes forward as evidence that it does not need to clear Port health again.</p> <p>a/ The CVED declaration has to be made via the EU wide TRCAES system. We have had to supply various information including, staff names and company details / emails etc. to register. Not sure if the EORI number is obligatory but I suppose it is a way of identifying the CVED declarant. In our experience charges for c/ and d/ (if incurred) get added to the manifest by the Shipping Line and are payable before the cargo is released in the final port of destination.</p> |