



# GROUPAGE MODELS

## FREQUENTLY ASKED QUESTIONS (FAQs)

### The European Union (EU) to Great Britain (GB) Imports – Groupage Models

**March 2022**

**V1.0**

The following FAQs will clarify some of the key areas surrounding European Union to Great Britain imports groupage models.

This document is intended to be continually edited and updated when new questions are received. The date on which the document was last updated, and version number is included for reference.



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# Groupage

## General

### 1. Introduction

The common element amongst all models; is the sealing of the consignment either at the overall load level or individual pallet level, before leaving the European Union. It is noted that in some models, a commercial seal may be placed instead, where an official seal is not compulsory. The use of an official seal is not a mandatory requirement for the import of animal products from the EU into GB in all instances. If an official seal is required, this will be stated in the relevant Export Health Certificate (EHC) guidance notes.

The groupage models presented are guidance on how a company could comply with the requirement where there are mixed loads, including loads with multiple consignments requiring an official seal or a mixture of those requiring an official seal and those which do not.

It is recommended that interested parties always check the relevant EHC for information on import control requirements for specific product types and, if required, seek additional advice from the relevant competent authority in the EU member state. If needed, contact the GB Border Control Post (BCP) linked to the point of entry to learn the BCP's operational procedures.

### 2. What does the term groupage mean?

Not a legally defined term but rather a word industry used to describe many different things. For example:

**Mixed consignment:** multiple product lines of the same commodity type (e.g., composite products) are grouped under a single export health certificate and imported as a single consignment.

**Multiple quantities of the same commodity type** (e.g., fish products) potentially from several sources are grouped into the same container. It may be possible to import these as a single consignment covered by a single export health certificate or as a mixed load (containing several consignments).

**Mixed load:** multiple different commodity types (e.g., dairy products and meat products) grouped in a single container.

In this FAQ document, groupage is defined as the commercial grouping of multiple consignments within the same means of transport.





### 3. What is the definition of a consignment?

A number of animals or quantity of goods covered by the same official certificate, official attestation, or any other document conveyed by the same means of transport and coming from the same territory or third country. For reference, 'consignment' is a legally recognised term set out in [Article 3 of OCR 2017/625](#).

### 4. List of commodities that require a seal:

Visit our dedicated [imports microsite](#) to see the list of [commodities that require a seal](#). You will need to be granted access to this site, please click on the link above and we will grant you access.



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## Groupage Models

### 5. What if any part of the mixed consignment is rejected?

- A rejected consignment can either be destroyed, sent back or re-purposed.
- For mixed consignments, if part of the consignment fails and part of the consignment passes, the competent authority can decide to break down the consignment to allow part of the consignment to continue to its destination whilst the other part is sent back/destroyed.
- [Legislation \(Article 37, OCR 2017/625\)](#) states that a mixed consignment cannot be broken down unless all relevant SPS checks have been conducted.
- However, a mixed consignment can only be broken in this way if the competent authority can guarantee that it poses no biosecurity risk, ensures compliance, and does not disrupt official controls [\(Article 66 \(4\), OCR 2017/625\)](#).
- Therefore, if you group products onto a single EHC (mixed consignment), the risk is that the whole consignment could be destroyed or sent back if one element of the consignment fails the check at the BCP.
- If a consignment within your groupage load is selected for a documentary, identity, and physical check at the BCP, please note, the full load of multiple consignments may be held until the inspection is complete.
- Additionally, please note, if the one consignment within the mixed load being inspected at the BCP fails the inspection and there is a risk of contamination other loads may be subject to checks too. This is at the discretion of the BCP.

### 6. If our haulier takes our goods in groupage, do we pre-notify for our part of the load?

The EU exporter:

- ensures that the consignment meets the relevant GB import requirements,
- obtains the appropriate export health certificate,
- ensures the relevant documentation travels with the consignment,
- provides the GB Importer with an electronic copy of the certified export health certificate

The GB importer/person responsible for the individual consignment (or a representative acting on their behalf):

- ensures they are registered on the Import of Products, Animals, Food and Feed System (IPAFFS) to complete the pre-notification for each of the individual consignments collected in the load,



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- ensures that the IPAFFS pre-notification is raised in time,
- is liable for the individual consignment (once the product has been imported into GB)

### **7. Can we the importer complete one single pre-notification on IPAFFS for one groupage consignment even if the exporters are different? We are responsible for the whole load/truck.**

No, you will need a separate pre-notification for each individual consignment on the means of transport. For example, multiple commodity codes can be added to one EHC, as long as the definition of the products falls within the scope of the certificate. The EHCs are the definitive and authoritative source of compliance with GB import requirements.

### **8. How do the various models cope with changes to the vehicle ID number/ registration number?**

- It is recommended that all relevant sections of the EHC are completed to ensure compliance.
- This means some Export Health Certificates explicitly requires the means of transport to be inspected to confirm products are transported in a suitable manner.
- It is accepted that there are instances where consignments are certified at a point when the transport details relating to the Vehicle Registration Number on the final means of transport are not yet known.
- In such instances, it is permissible to certify 'groupage' in place of the Vehicle Registration Number on the EHC at the point of certification.
- This is permissible only for an individual EU to GB consignment of animal products where the consignment forms part of a groupage or mixed load.
- This guidance only applies when completing the physical EHC.
- You cannot add 'groupage' to the pre-notification on IPAFFS in place of the vehicle registration number. Where it is required, you will need to have the vehicle registration number to enter into IPAFFS.





**9. For sequential loads does this mean that there needs to be the relevant number of entries on IPAFFs? i.e., if the truck is collecting from 3 different suppliers, then 3 different IPAFFS notifications are required?**

The facility to group various product lines onto a single EHC is decided by the specific conditions of the relevant EHC. For example, multiple commodity codes can be added to one EHC, as long as the definition of the products fall within the scope of the certificate. This can be found in the guidance notes and only if each meets the same attestation of the certificate.

It may be possible to consolidate a number of batches of products into a single consignment, which a single EHC would cover. This could cover, for example, multiple product lines of the same commodity type (e.g., composite products) from the same supplier.

If the importer of the consignment is different, or consignments are from other countries of origin, or these are different commodity products, that information cannot be captured on one single EHC and would need an individual pre-notification. Therefore, this would require more than one EHC to cover the load.

It is for the Certifying Officer (CO) issuing the EHC to decide if the correct information has been supplied to certify the EHC.

**10. If using the consolidated model, does the manufacturing site need a vet, as the EHC certification will take place at the consolidation site?**

If you are using the consolidation hub model, then from 1 July 2022, the EU member state certifying officer inspects and certifies each individual consignment received at the consolidation hub.

If certification is not taking place at the consolidation hub, then you may wish to use the sequential model (applicable from the end of the import control phasing period). This is designed to facilitate pick-ups from multiple sites, with certification at each pick-up point.

All models may be used in conjunction with each other if the general principles around, certification and full traceability remain for each product entering Great Britain.

For example, traders may wish to blend the linear model with the consolidation hub. Some goods could arrive sealed and certified from previous pick-up points at pallet level via the linear model to a consolidation hub.

Once they arrive at the consolidation hub, additional consignments can be added to the load and sealed. The decision as to which model(s) should be used and how GB import requirements are met should be discussed between the EU exporter, the GB importer, and the member state certifying authority.





**11. Could the load be certified prior to its arrival to the consolidation hub? Or does it need to be certified there?**

Yes, the process of having certification prior to the arrival at the consolidation hub is explained in the linear model and the hybrid approach. The key is to ensure that the general principles around certification, traceability and biosecurity remain for all products entering GB.

**12. Can one export health certificate cover multiple pallets sealed on the linear model going to multiple GB destinations?**

The facility to group various product lines onto a single EHC is decided by the specific conditions of the relevant EHC. For example, multiple commodity codes can be added to one EHC, as long as the definition of the products fall within the scope of the certificate. This can be found in the guidance notes and only if each meets the same attestation of the certificate.

It may be possible to consolidate a number of batches of products into a single consignment, which a single EHC would cover. This could cover, for example, multiple product lines of the same commodity type (e.g., composite products) from the same supplier.

However, if the importer of the consignment is different, or consignments are from other countries of origin, that information cannot be captured on one single EHC and would need an individual pre-notification. Therefore, this would require more than one EHC to cover the load.

It is for the certifying officer issuing the EHC to decide if the correct information has been supplied to certify the EHC.

**13. For the linear model, the pallet must be sealed in the presence of a certifying officer. Does the certifying officer issue the EHC prior to the pallet being sealed, or is it issued at the time the pallet is sealed?**

An official seal is affixed to the container, truck, or rail wagon under the supervision of the certifying officer issuing the export health certificate.

<https://www.legislation.gov.uk/eur/2019/2128/annex>.

The seal number must be recorded on the EHC to be considered an official seal. It is for the individual certifying officer to decide the preferred process.





## Official/Commercial Seals

### 14. What is an Official Seal?

#### Official Seal

An official seal is affixed to the container, truck, or rail wagon under the supervision of the certifying officer issuing the [export health certificate](#).

### 15. What is a Commercial Seal?

A commercial seal is essentially a non-official seal. This means it was not affixed under the supervision of the certifying officer and therefore is not recorded on the export health certificate. It is a commercial decision if you want to apply a commercial seal to your consignment.

In summary, if the seal number appears on the EHC, i.e., the unique seal number recorded in the relevant box, it is regarded as an official seal. If the seal number is not recorded on the EHC, it is not an official seal. The use of official seals in the context of groupage is not mandatory.

### 16. Is an official seal mandatory?

Applying an official seal to a consignment or multiple consignments of animal products for import to the GB market beyond what is legally required is a commercial decision for a GB importer to make and negotiate with the competent authorities in the exporting country, in conjunction with the EU exporter.

The use of an official seal is not a mandatory requirement for importing animal products from the EU into GB in all instances. If an official seal is required, this will be stated in the relevant EHC and guidance notes.

The relevant legislation for the specific commodities will indicate the legal requirement to seal the consignment by the authorities. This may then be reflected in the sanitary guarantees in part II of the EHC (Sanitary Attestation) or the explanatory notes on the certificate. Part 1 of the EHC has a dedicated box to record the seals applied to the means of transport; for further information, please see the GOV.UK page for [model health certificates](#).

### 17. If I use an official seal, would that mean the consignment will not require any further checks?

From an SPS import controls perspective, evidence of an official seal alone does not supersede any checks necessary to verify compliance with the import rules; this will form only part of an overall consideration.

At all times, the discretion remains for any consignment subject to import controls to be selected for a more detailed documentary, identity, and physical checks with the competent authority/port health authority.







**18. Is there a list of tariff headings or product names for those goods that are classified as Products Of Animal Origin (POAO) and for which official seals are mandatory?**

POAO, by its definition, is an animal product that is intended for human consumption.

Visit our dedicated [imports microsite](#) to see the list of [commodities that require a seal](#). You will need to be granted access to this site, please click on the link above and we will grant you access.

## Export Health Certificate (EHC)

**19. How do I know what products can be grouped onto a single EHC?**

The facility to group various product lines onto a single EHC is decided by the specific conditions of the relevant EHC. For example, multiple commodity codes can be added to one EHC, as long as the definition of the products falls within the scope of the certificate. The EHCs are the definitive and authoritative source of compliance with the GB import requirements.

**20. What documents must accompany the consignment to the place of loading to allow the certifying officer to sign the EHC?**

It will be dependent on the product, and this is a question that should be directed to the competent authority in whichever member state you are exporting from. They will tell you what they need to see to certify that the product meets GB import requirements.

**21. In terms of groupage, who would be defined as the consignee on the EHC?**

The definition of consignee does not change because you are importing them using a groupage model or facilitating groupage imports.

The consignee is a field on the EHC, which requires you to enter the name and address of the natural or legal person receiving the consignment in GB, and if it were a transit consignment, it would be the person receiving it in the third country destination.

It is a requirement on the EHC and does not change under a groupage model.

**22. Will a system similar to groupage export facilitation scheme (GEFS) be available in the EU to allow exporters to send us products from multiple locations without needing multiple health certificates?**

There are no plans to set up a similar system to GEFS for imports. At the current time the requirements for the individual EHCs would remain.





**23. How does it work for goods that start in one member state but are amalgamated with those from another member state, can a certifying officer sign for goods from another jurisdiction?**

The individual consignments being certified must meet relevant GB import requirements, irrespective of which model is being used.

In this instance, the applicable groupage model would be linear, and it is for the certifying officer issuing the EHC to decide if the correct information has been supplied to certify the EHC.

**24. How does the original certificates have to travel with the consignment? Can you give it to the truck driver? Can you tape it to the pallet? Does it have to be visible without needing to break the seal?**

It is a legal requirement to present the original EHC to the inspectors at the BCP to verify the consignment. It is not defined how it gets to the inspector, so it is a commercial decision to make.

For example, the exporter could send it with the driver or attach it in some way, as long as they are satisfied that it will get to the BCP.

In terms of breaking the seal, we would recommend that the EHC is not the behind the seal that needs to be broken, because in some cases, it would mean that you would have to open the container and go looking for the certificate.

## Border Control Post (BCP)

**25. If the groupage load contains products with different commodity codes, where should they be split to comply with the correct BCP?**

This would depend on what the specific commodities are and will dictate the controls required, but from the 01 July 2022 you must arrive at a Point of Entry that has a BCP designated for the products contained within the means of transport.

You cannot arrive at a Point of Entry that doesn't have a BCP authorised to check each of the products / consignments on the load.

For example, if you had a mixture of various animal products on the trailer, you would need to arrive at a Point of Entry with a BCP designated to check those commodities.

If you had a mixture of POAO and animal products, then you would need to ensure that the Point of Entry had a [BCP](#) that was designated to check both of those products.





## 26. Can I see a list of Border Control Posts, including what commodities they will accept?

Please view the planned Border Control Points in development for 1 July 2022 by clicking [here](#).

The information includes the following:

For England, Scotland and Wales: Facility name, website, commodities already designated (existing BCP), commodities requested awaiting designation and additional specifications regarding the scope of the designation.

If you have any enquires regarding the commodities listed please contact the Ports directly. Defra is unable to provide any further information on the timeline for completion of designation.

## 27. For groupage loads, how will you ensure ID/physical checks do not cause delays, and do not affect other goods on the load?

You will need to factor in extra time for your consignment if it is selected for documentary, identity, and physical checks.

This is something that anyone engaging in groupage needs to be aware of for logistical reasons; if a vehicle is stopped, then it is likely that all the consignments on the load may be held until all inspections are satisfactory and complete, and then it can be released.

## 28. Will there be costs charged for the inspection of groupage goods?

From July 2022, the Port Health Authorities will be able to levy charges for the checks they carry out, according to tonnage and commodity type. If they are carrying out SPS official controls, then they're able to levy charges for those.

There is a flat fee for all consignments subject to SPS official controls, irrespective if it is just documentary or documentary, identity, and physical.

Please contact the Port Health Authority (PHA) to find out about fees and charges.

## 29. Is there a different fee structure for groupage loads?

No. Charges are made based on individual consignments as defined under the Official Controls Regulations (OCR).

## 30. How will the selection for physical checks be informed?

The requirement to attend a Point of Entry with an appropriate BCP comes into effect from 01 July 2022. There will be a process for communicating if the hold has been lifted or if the consignment needs to attend the BCP, and there will be further information on this process prior to 01 July 2022.





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**Groupage resource available:**

Resource Title/Link
<a href="#">Pre-recorded presentation</a>
<a href="#">Presentation slides</a>
<a href="#">Consolidation model process map</a>
<a href="#">Linear model process map</a>
<a href="#">Fact sheet</a>

**Other resources available:**

<https://www.gov.uk/government/collections/guidance-on-importing-and-exporting-live-animals-or-animal-products>

[Border Control Posts – Border Control Posts \(bcmap.co.uk\)](http://bordercontrolposts.co.uk)

**Useful information**

- Visit our dedicated [imports microsite](#) for information (FAQs, process maps, and guidance documentation) about import controls. You will need to be granted access to this site, please click on the link above and we will grant you access
- View all import controls currently in force and upcoming requirements as a [visual snapshot](#) on the imports microsite
- Factsheets have been developed to provide you with key information about the upcoming changes across several commodities. Visit the microsite to view the [Animal imports fact sheets](#)
- Find out more about [Importing food and drink from the EU to Great Britain on gov.uk](#)

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If you have any questions, please contact [imports@apha.gov.uk](mailto:imports@apha.gov.uk).



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