



What to expect on day one of a no deal scenario: Businesses trading in food and drink[†]

The UK government will maintain our current world-leading set of standards on food safety, food labelling and food quality, ensuring high food standards at home and promoting high standards internationally.

If the UK leaves the EU without a deal, at first, the EU-based provisions would be rolled over, as part of the Withdrawal Act, and fixed where necessary by statutory instrument so the rules apply as before.

However, you should expect some changes would be required to reflect the fact that the UK is no longer a member of the EU.

Where the UK has its own food and drink compositional standards that do not stem from the EU, these would remain unchanged, such as specific national rules on products containing meat and the composition of bread and flour.

How processes will change

Labelling the origin of food: If you are exporting food from the UK use of the term EU in origin labelling would no longer be correct for food or ingredients.

Some of your products will require further changes. For example, labels of honey blends from more than one country referring to the EU would be replaced. You would need to replace the labelling requirement for EU and non-EU blended honey indications with 'blend of honeys from more than one country' or similar wording in the domestic honey regulations.

In addition, businesses should be aware that from April 2020, the country of origin or place of provenance of the primary ingredient of a food (where different to that given for the food overall) will be required on labels as part of EU rules on food labelling.

Addresses on food labels: If you are a UK food producer, distributor or importer, or retailer, pre-packed food sold in the UK would need to include the name and a UK address of the responsible food business operator. The food business operator is the business under whose name the food is marketed in the UK or, if that operator is not established in the UK, the importer of the product into the UK.

An EU address alone would no longer be valid for the UK market. Similarly, a UK address alone would no longer be valid for the EU market and an address within the remaining EU countries will be required following EU exit.

A UK address together with an EU address on the label would mean that the label is valid for both the UK and EU markets.

However, for your foods already labelled and placed on the UK market bearing an EU27 address, these will be allowed to be sold until your stocks are exhausted.

The government is exploring options for allowing transition periods for label changes within the UK market. Updates will be published in due course on GOV.UK.

Natural mineral waters

If you are a UK producer of natural mineral waters, you will need to apply for recognition of your water through an EU country after the UK leaves the EU.

Applications from UK producers will be treated as third country applications and will be processed in the same way as applications for third country natural mineral waters are processed now. You can find information about the application process on GOV.UK.

Making importing easier from the EU

HMRC is introducing new [Transitional Simplified Procedures \(TSP\)](#), to make importing through roll-on, roll-off ports and the Channel Tunnel easier for the initial period after the UK leaves the EU, should there be no deal. We anticipate TSP will remain in place until traders are ready to use rest of the world processes and permanent arrangements are in place, which will take at least a year.

Sign up for HMRC's new [Transitional Simplified Procedures \(TSP\)](#), online from 7 February, to make importing easier for you until at least April 2020.

Once you are registered for TSP you will be able to:

- transport most goods into the UK without having to make a full customs declaration at the port
- postpone paying your customs duties.

However, for controlled goods, such as animal products and most plants, or excise goods like alcohol or tobacco, you will have to provide some customs information before import.

We have published further [guidance on TSP](#) on GOV.UK, including the locations TSP applies to.



Actions you should take now

1. Consider the requirements of the new food and drink labelling arrangements and plan accordingly for future trading with minimal disruption after EU Exit.
2. Consider any changes you may need to make to adapt to new processes and systems in the event of a no deal. This should include the new food labelling and address regulations and additional time that may be required to plan and complete changes and additional costs that may be incurred.
3. Ensure you apply for recognition of your natural mineral water through an EU country after the UK leaves the EU.
4. Take account of the volume of your trade with the EU and any potential supply chain impacts.
5. Consider the impact on your role in supply chains with EU partners. In a no deal scenario, trade with the EU will be on non-preferential, World Trade Organization terms. This means that Most Favoured Nation tariffs and non-preferential rules of origin will apply to consignments between the UK and EU.
6. Sign up for [Transitional Simplified Procedures \(TSP\)](#), online from 7 February, if it's suitable for your business but you should note that:
 - you will need to use your EORI number to register
 - if you are importing controlled goods such as animal products and most plants, or excise goods like alcohol or tobacco, you will have to provide some customs information before you import
 - read further guidance on TSP on GOV.UK, including the locations TSP applies to.
7. The passport rules for travel to most countries in Europe will change if the UK leaves the EU on 29 March 2019 without a deal. Read the government's guidance on [Travelling to the EU with a UK passport if there's no Brexit deal](#) and, if relevant, ensure your employees and customers are aware of the potential changes.
8. Stay up-to-date with these changes by [registering for email alerts](#). Follow the link, add your email address, select 'Submit', select 'Add subscription' and choose 'EU Exit' then select 'Submit'.