



NEW ZEALAND
FOREIGN AFFAIRS & TRADE
Manatū Aorere

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United Kingdom: Border Target Operating Model

MARKET INTELLIGENCE REPORT

Summary

Prepared by the High Commission in London

- The United Kingdom is making a range of changes to its customs regime under the recently announced Border Target Operating Model (BTOM). The intention is to simplify, digitise and over time, deliver border controls through the UK's new Single Trade Window. It will also implement the same controls on imports from European Union countries as those from non-EU countries.
- These changes will be implemented at three milestones: extra certification requirements for some products imported from the EU will come in from 31 January; physical border checks on goods from the EU will begin occurring from 30 April; and full implementation is expected by 31 October.
- The first tranche of changes on 31 January will affect goods moving from the EU to Great Britain, so it will not affect New Zealand exporters sending directly into Great Britain, but New Zealand exporters exporting from EU to Great Britain will need to be aware of the new requirements.

Report

The United Kingdom is implementing a range of changes to its customs regime in 2024. From 31 January, the UK will begin to introduce its post-Brexit strategy for border controls and import processes – the [Border Target Operating Model \(BTOM\)](#).

The BTOM will apply to all goods entering Great Britain (i.e. the island consisting of England, Scotland and Wales; for goods moving from Great Britain into Northern Ireland, arrangements are set out under the Windsor Framework), from EU and non-EU countries, though the first deadline only affects products entering from the EU.

The changes outlined in the BTOM will be implemented progressively.

- From 31 January 2024, health certification will be required for imports of medium risk animal products, plant products and high risk foods of non-animal origin from the EU. Product types that will require health certification include milk, meat and eggs intended for human consumption. A full list of which goods fall into which risk category can be found [here](#).
- From 30 April 2024, the UK will introduce documentary and risk-based identity and physical checks on medium risk animal products, plants, plant products, and high risk food and feed of non-animal origin from the EU. Existing inspections of high risk plant products from the EU will now occur at border control posts. At this stage, low risk imports from non-EU countries will begin to be simplified. This may include, the removal of health certification and routine checks on low risk animal products, plants, plant products from non-EU countries as well as a reduction in physical and identity check levels on medium risk animal products from non-EU countries.
- The full regime will be in place by 31 October 2024. At this stage, all imports into Great Britain from the EU will be need to be accompanied by a [Safety and Security \(S&S\) declaration](#) and the UK Single Trade Window (see below) will be available for public use.

The BTOM sets out a plan for establishing a Single Trade Window – a gateway between businesses and the UK border system that will allow for import, export and transit documentation to be submitted in one place. The Single Trade Window is currently in a closed beta testing phase. Businesses interested in taking part can register their interest with His Majesty's Revenue and Customs (HMRC) [here](#). Subsequent open beta testing is expected throughout 2024.

The small number of affected New Zealand businesses importing into Great Britain from the EU should be preparing for the health certification requirements that enter into force from 31 January. New Zealand businesses importing into Great Britain from New Zealand

will not be affected by the first tranche of changes. New Zealand exporters may be affected by broader delays at the UK border resulting from the implementation of the BTOM changes.

The Department for Environment, Food & Rural Affairs (DEFRA) ran a series of sector specific webinars to help businesses prepare (these are [available online](#)).

There remains concern amongst commentators and some industries that many EU exporters are not prepared for the BTOM changes. European plant and flower exporters in particular have raised concerns about the delays that could be incurred when physical checks begin in April, and requested that the 31 January milestone be further delayed. And there is scepticism from many trade experts that smaller European exporters (i.e. artisan food producers) are fully aware of the imminent documentation requirements.

The implementation of post-Brexit changes to the UK's border has been delayed five times since the UK-EU Trade and Cooperation Agreement (TCA) entered into force at the beginning of 2021. The measures outlined in the BTOM were first announced in draft form in April 2023. Commentators judge that a sixth delay is unlikely to occur and the UK Government has been adamant that implementation will not be delayed again.

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