

## The situation in Ireland - part 2

### An interview with Marie-Aude Danguy of Triskell Seafood Ltd

The July 2020 issue carried a certain amount of copy on coping with the Pandemic as reported from various places. Little did we realise then that a year later there would still be so much that is different from what we took before to be normal life. Another major change thrown in for this year is of course the implementation of Brexit rules from January. Last year Triskell supplied us with a picture of life under lockdown. It concluded with a thought if just 20% of Irish consumers ate a dozen oysters every month they would have no oysters left to export... I asked for an update this year and here they reflect on problems that have ensued since the imposition of the Brexit rules. Pressure of work however prompted them to suggest that this time it should be done in the form of question and answer. Editor

**Had they made preparations for the changes due with Brexit?**

We certainly had! Our Office Manager Brona did training with the Local Enterprise Office (LEO) and with Bord Bia (the Irish Food Board) and both organisations had offered one-to-one mentorship services to all participants. Our preparation for Brexit began in September 2019, about 16 months before it actually happened.

Of course it is difficult to prepare for the unknown, there were so many 'what ifs' and 'maybe's' which made it difficult both for the trainers and those, like ourselves, who were trying to ensure that there would be minimal disruption to the business.

**How much help was available? Was this help easily accessible and what were the best sources of help with problems?**

In Ireland there was certainly loads of help available and it was easy; and in many cases free; to access. The Irish Government ran ads across all media to encourage businesses to prepare for Brexit and to try and ensure that they were as informed as possible.

A number of companies were also in touch before and after offering their services as Custom Clearance Agents or help to do the training to set up in-house as a CC Agent.

**Did they anticipate many problems ahead of Brexit happening?**

There was a lot of uncertainty about what was going to happen which made it difficult to anticipate potential issues. It wasn't clear until the very last minute whether a deal was going to be agreed between Britain and the EU, the consequences for Northern Ireland, and what that might entail. In fairness Ireland was paying close attention to what was going on, probably as a result of our geographical location on the fringe of Europe, and our long ties to Britain. In France some of our customers and suppliers seemed to hardly tune in or consider the possible outcomes.

Even though the Government here took a really strong stance on encouraging businesses to be Brexit-ready we knew it was going to be a mess. It all felt very



last minute, decisions were being pushed back and pushed back. Even as we were getting close to Christmas we didn't know whether there could still be a deal and what form that would take. As a result, I don't believe either side could have been 100% ready in January and that was a major cause of the backlog at customs and ferry ports in the New Year.

**How different has the reality of Brexit been from what was anticipated?**

I don't think all the problems were anticipated. It seemed to take about 3 months from 1<sup>st</sup> January for things to settle down, particularly for the courier companies to sort out the backlogs of goods through customs. I'm not clear where the responsibility for that lay in the end. And then the regulations are still changing; we only received guidance on 18<sup>th</sup> April on what was entailed for the new health regulations for live seafood that came in on the 21<sup>st</sup> April! That lack of clarity is not helpful.

The next set of health regulations coming into effect on the 1<sup>st</sup> October '21 are also unclear at this stage and we don't know what this will mean for us as traders moving live product. It is a very difficult situation but we're adamant that we want to continue working with our GB suppliers and customers with whom we have built up strong relationships over many years.

**How much has the paper work/administration increased with the change?**

Massively. There is a huge amount of extra work and cost involved, both in terms of new fees being applied for customs and in the manhours required to complete the new paperwork. The level of detail required is problematic too, for instance we have to specify the trailer number plates on the customs paperwork which may not be known until the very last minute.

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There is an issue too around the systems being used and the various authorities involved in regulating export and import not developing systems and procedures that are aligned with one another. We are wasting an incredible amount of time trying to interpret what each side wants and going back and forth speaking to the Revenue, the Irish Marine Institute, the Department of the Marine, HMRC and TRACES. We feel there has been a lack of support from some Authorities we deal with and a reluctance on an official level to make decisions about what can reasonably be required from businesses on the ground, like ourselves, who just want to get on with doing business.

Are the problems you are experiencing due to the fact they are time - limited because of dealing with live product?

Yes, that was very evident when we did a recent import of live *C. gigas* seed from Guernsey. Although the import was known about and flagged to all relevant Authorities well in advance we could never have expected the amount of time and headache involved in getting it into this country. We were importing for a group of growers but the process was extremely complicated and aggravated by the fact that there was very little support available when the logging of correct information failed. I feel sure no individual grower would have had the time, patience or resources to have arranged the same import independently.

As an example of what we are dealing with; some of the paperwork required to import is only submissible 24 hours ahead of that import but the automated response to the submission says that a member of staff will get back to you within 5 working days!

It seems to us that there hasn't been enough thought put into thinking through the implications of each instruction.

We are experiencing the same levels of red tape and delays when importing and exporting equipment from Britain but clearly a pallet of oyster bag floats being stuck in a warehouse for a fortnight is simply an inconvenience. When we are talking about shipments of live shellfish everything is obviously so constrained by time and the cost of a lost shipment is enormous.

Have substantial losses been incurred? – or does the risk of losses remain?

Yes to both questions. The extra administration involved in exporting has had an impact on our bottom line, no question. There is also a loss of business; we have British customers who haven't got the necessary registrations in place for us to be able to ship to them or who feel that the duty liable on the goods are too high and so cancel orders.

On the seed import that I mentioned from Guernsey, we had one customer who had underestimated the time required to register on TRACES and so ultimately wasn't able to take any seed. As the sources for disease-free seed are limited that has a long-term impact on his business as well on ourselves as the importers. Other

users agree that some of the systems used are not user-friendly, and I would question how much consultation and testing went into the setting up of the procedures involved.

We also lost a significant trade of live shellfish from GB to France due to the ban of products from category B waters, as well as some exports from Ireland to the UK of half-grown and fully grown oysters.

In the particular case I've heard about - is the problem due to dealing with a less accessible place ie an island -or are there likely to be similar problems with movements between Ireland to Northern Ireland or to the rest of the UK?

Currently we have no issues with shipping to the North of Ireland, as a result of the Northern Ireland Protocol doing business with growers there is the same as with the EU. The sale of shellfish into Britain is another matter; we await confirmation of what the next set of health regulations will entail. It is likely there will be extra admin work and extra health checks at the Border Control Posts (BCP) which will create more stumbling blocks.

Is the problem directional i.e. more difficult to go from GB to Europe or equally difficult either way (I suspect it is just live things going to Europe?)

I believe traditionally there was more business into the EU from Britain than the other way around. Leaving without a trade agreement resulted in catastrophic consequences for UK shellfish growers and fishermen, overnight preventing them from trading as usual. How did the industry arrive at this situation? Who assumed what and when?

We are also aware that a lot of Irish companies have simply given up on exporting to Britain and have spent the last year building new markets for their goods to other destinations.

Nicki Holmyard has written very eloquently about the major problems Offshore Shellfish is having with exporting mussels but presumably any difficulties you are having is not due to product coming from class B waters?

There is no doubt that the ban in Europe on buying from Britain has been a boom for Irish and Dutch mussel farmers. The growers we have spoken to have said the lack of UK supplies has resulted in a massive boost in their sales. We feel enormously sorry for the growers in Britain who have spent so many years building those connections up and who have quality product ready for market that they simply can't sell.

To what extent are the difficulties due to the additional paperwork and the fact that lorries are not prepared to deal with orders that could carry special risks to their time allocation?

The transport companies are reluctant to use the land bridge now because of the possible delays and paperwork involved. That means that there are extra

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costs involved to export as some of the new ferry routes are more expensive and the timings can mean extra manhours for the drivers. Sudden changes to the weather and sailings can have a massive impact as well. This year has seen Hatcheries in France cancel shipments to Ireland at the last minute following bad forecasts rather than risk the loss of that shipment altogether due to delays in ferry sailings.

There is no longer any quick fix available for these situations or where a driver might face other unexpected delays en route that might make him late for his sailing. There is simply too much last minute paperwork and customs involved.

The issues around BCPs are also of concern for the hauliers, and ourselves. If BCPs are not located by the ferry ports, are the trucks coming from Holyhead or Cairnryan supposed to divert their route to access a BCP? Are sufficient resources going to be put in place to avoid any delays for batches of seafood with limited shelf life? In Ireland we already have Posts in Dublin, Rosslare and Shannon – all the major points for goods in and out.

In summary I suppose there are 4 key issues that are causing problems and which will continue to cause problems until they are satisfactorily addressed.

- \* Uncertainty. We don't know what the future holds as we are not getting clear guidelines from the Authorities.
- \* The applications used by the various bodies involved in the export & import of shellfish must be compatible and work towards the same goal.
- \* While some individuals in the various organisations have done their best to help with queries it is nevertheless critical that there are people available in the Marine Institute, Irish Revenue, TRACES, the BCPs, HMRC, the Department of the Marine etc to take phone calls, to answer questions and process the paperwork. Automated emails just don't cut it with live product.
- \* It is critical that people in charge make decisions tailored to our fast-paced and valuable industry. We all want to see the growers, fishermen, traders, buyers, processors and the transporters getting back to doing business.



# Triskell Seafood<sup>LTD</sup>

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