

EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
FOR HEALTH & FOOD SAFETY  
Directorate G – Crisis Preparedness in Food,  
Animals and Plants  
Mr. Péter Bokor  
Head of Unit

**Via Email**

14<sup>th</sup> June 2024

**Requirements for Inspection rooms for physical controls in commercial storage facilities under Implementing Regulation (EU) 2019/1014, necessary exemptions in case of inspection facilities for products of non-animal origin**

Dear Mr. Bokor,

With a view to the ongoing discussions at the EU level, we would like to once again draw your attention to our previous letter, dated January 17<sup>th</sup>, 2024, regarding the requirements for inspection rooms for physical controls in commercial storage facilities as outlined in Implementing Regulation (EU) 2019/1014, Article 3 (1) (b), applicable to commercial facilities via Article 3(11).

**I.**

In contrast to inspection rooms used for the testing of materials of animal origin, in case of products of plant origin there is no compelling reason why commercial storage facilities should be equipped with hot and cold running water and drainage systems. As already pointed out earlier:

- In case of dried plant material, hot and cold running water is not required to maintain food hygiene and to prevent from cross contamination.
- Flushing and cleaning with water can be detrimental to raw plant materials, considering that humid environments promote growth of pathogen microorganisms.
- Drainage systems are counter productive particularly in terms of rodent infestation and thus create a non-justified risk of adverse effects to food hygiene.

It is evident that the objectives of maintaining food safety, upholding hygienic standards, and mitigating health risks **can be achieved through various means**, particularly concerning the equipment of storage facilities used for physical inspections. While it is mandatory to have running water, proper drainage pipes, and other infrastructure for food and feed of animal origin, such high levels of infrastructure are not essential for food and feed of non-animal origin. **Regular dry cleaning** as practiced in the commercial storage facilities is completely sufficient to ensure an acceptable level of food hygiene.

We assume that these arguments are also widely shared by the local government inspection practitioners at the harbour site.

## II.

The majority of relevant raw materials imported into the Union are cleared through the harbours of Hamburg, Rotterdam and Amsterdam. Therefore, the need for sufficient inspection room capacities is of paramount importance, as well as the prudent use of resources to ensure a comprehensive, risk-based control system.

Hamburg, as a major EU import hub for goods of animal and non -animal origin, provides a wide variety of well-equipped inspection rooms within storage facilities. These facilities are equipped with running water, drainage systems, and other necessary infrastructure, where **required by the nature of the products tested**, and companies have consistently invested in maintaining these high standards.

On the other hand, SME storage companies would **not be able to maintain their services in case of plant material**, as any retrofitting of inspection facilities for non-animal materials would impose a disproportionate burden to the companies not justified by the needs of the products tested. In effect, this would lead to a **gap, detrimental to a smooth import practice** of the product group concerned, particularly with a view to the importation of **plant material subjected to increased control frequencies** under Implementing Regulation (EU)1793/2019.

## III.


With this in mind, we reiterate our request and **propose amending Article 3(11) of Regulation (EU) 2019/1014** to include exemptions for commercial storage facilities, as previously outlined in our communication to the Commission, i.e.:

*“11. The competent authorities of the border control post may permit, under their control, the use of commercial storage facilities for the goods referred to in Article 47 (1) of Regulation (EU) 2017/625, provided that those facilities are within the close vicinity of the border control post and are under the competence of the same customs authority.*

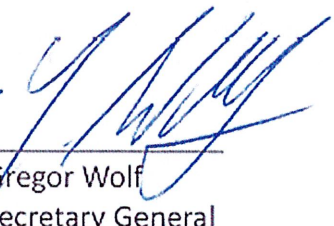
*Such commercial storage facilities may be used to perform identity checks and physical checks on products of non-animal origin, provided that these facilities comply with the minimum requirements, laid down in this Regulation, **except for the requirements laid down in Article 3 (1) b and (2).**”*

For the reasons outlined above, we would greatly appreciate the EU Commission to consider our approach in the ongoing discussion process, bearing in mind that most storage companies, especially those at the Hamburg seaport, may no longer qualify to conduct inspection activities. This could jeopardize their crucial role in import control practices at this vital EU harbour for plant raw material consignments

Sincerely,



Lutz Düşop  
Secretary General



Gregor Wolf  
Secretary General