

 **NVVS** (Dutch Ship Suppliers Association)

O.C.E.A.N.

ORGANISATION OF EC-SHIPSUPPLIERS



# Evaluation Directive 97/78/EC





## Evaluation Directive 97/78/EC

- Presentation given by J.D. (Dick) Peterse, vice-chairman of the Dutch Ship Suppliers Association (DSSA), on behalf of both O.C.E.A.N. and the DSSA
- Note: the O.C.E.A.N. board, recently gathered in a meeting in Genoa, fully endorsed this presentation



# Evaluation Directive 97/78/EC

## Objective:

Coming to a more simplified and flexible legislation by putting the Directive's contents to the test, notably where it concerns the working environment of our industry (articles 12 and 13)



## Evaluation Directive 97/78/EC

### Motive:

- This directive marks a period of uncertainty following the completion of the internal EC market, and the necessity to realise an adequate external border control system
- Since the directive came into force there have been developments inducing both the authorities and the trade to strive towards an evaluation of the directive
- From the beginning (90/675/EEC) our industry has always been very actively involved in the completion of the lawmaking involved



# Evaluation Directive 97/78/EC

## In Retrospective: (1)

- 1/1/1991 coming into force of Directive 90/675/EEC
- 30/6/1999 withdrawal of Directive 90/675/EEC
- 1/7/1999 transposition date Directive 97/78/EC
- Early 2005 first signs of a possible evaluation of the directive
- 12/7/2007 general consultation with SANCO and first exchange of views on the directive



## Evaluation Directive 97/78/EC

### In Retrospective: (2)

- 11/2007 Written presentation with the Commission of A.I.P.\*/DSSA's views
- 01/2008 Receipt final questionnaire, start of deliberations A.I.P.\*/DSSA → Dutch authorities
- 02/2008 Deliberations on the questionnaire with O.C.E.A.N. Board members

\*(Agricultural Import Platform)



## Evaluation Directive 97/78/EC

### What induces us to formulate our wishes?

- At the time the key word was canalization, the ambition to get control over the import of for transit approved veterinary products through adequate legislation. This canalization functioned well!
- This result, together with the fact that it was no longer allowed to bring onto EU territory veterinary products for import and transit without a veterinary agreement between the EU and the third country of origin, induces us to formulate our wishes.
- Also the Feed and Food legislation offers extra security as it regulates all risky products.



## Evaluation Directive 97/78/EC

What items/articles of the directive should be rewritten in our opinion?

- Storage system
- Control & monitoring system
- Storage regime EU approved & for transit approved products
- Supply to vessels outside EU territory with a veterinary certificate
- Missing veterinary certificates
- 100% entrepot exit control



# Evaluation Directive 97/78/EC

## 1. Storage system:

- The directive only allows a one-time storage, viz. Article 12 → article 13
- Since it is no longer allowed to bring onto EU territory veterinary products for import and transit without a veterinary agreement between the EU and the third country of origin, the risk of letting in contagious animal diseases no longer exists.
- We opt for the abolition of the one-time storage rule, thus allowing the industry to make more balanced decisions till the very last moment



# Evaluation Directive 97/78/EC

## 2. Control- & monitoring system:

- More focussing on administrative measures instead of physical supervision
- A valid storage administration should be the substitute for physical control. An adequate Custom control should be sufficient
- Regular bilateral consultation between the veterinary and customs services could save time and money for all parties involved



## Evaluation Directive 97/78/EC

### 3. Separated storage of EU approved and for transit approved veterinary products:

- Because of the fact that there is no risk of contagious animal diseases, the storage rules with respect to the abovementioned products should become less stringent



## Evaluation Directive 97/78/EC

### 4. Supplying vessels outside the EU:

- The direct supply to vessels outside EU territory under cover of a veterinary certificate should be made possible. It goes without saying that the ship supplier is obliged to return the v.c. fully stamped and signed.
- This would save all parties involved a lot of paper work



# Evaluation Directive 97/78/EC

## 5. Non-returned veterinary certificates:

- The directive dictates that official proof, certifying that the products have reached their final destination, should be provided. For this purpose the veterinary certificate should be returned duly stamped and signed by the captain or his representative. The directive does not mention the possibility to submit alternative proof where v.c.'s are not returned.
- We ask for a provision to be made in the directive allowing such alternative proof.



## Evaluation Directive 97/78/EC

### 6. 100% exit control:

- The directive dictates that daily logging of all consignments entering or leaving the warehouse should be effected.
- Details concerning nature and quantity of the products per consignment and the name and address of the recipient are being logged.
- Furthermore the authorities check the goods during storage to prevent the goods from being changed or switched.
- In our opinion such a strict entry and storage control approves of a more flexible, but above all a less time consuming exit protocol.



## Evaluation Directive 97/78/EC

### Further not necessarily ship supply related wishes: (1)

We fully support the A.I.P. vision on:

- Risk based approach for import and/or transit of veterinary goods
- Electronic health certification
- Use of smart seals
- More veterinary controls in the countries of origin involved



## Evaluation Directive 97/78/EC

### Further not necessarily ship supply related wishes: (2)

- Further digitalisation of communication
- Maximum number of days for transshipment should be abolished, the maximum number of days should in fact be increased
- Handling of Article 11 goods, i.e. third country to third country should be limited as far as information and/or paper work is concerned

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**-THE END-  
Thank you!**