



SPS Certification WG

www.chilledfood.org/Brexit

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25 July 2024

Rt Hon Steve Reed OBE MP
Secretary of State
Defra

Dear Secretary of State,

BORDER TARGET OPERATING MODEL – CRITICAL ISSUES IMPACTING GB FOOD- and BIOSECURITY

Congratulations on your appointment as Secretary of State. We look forward to working with you and your colleagues to help resolve critical issues regarding the BTOM impacting food- and biosecurity.

The food industry is recognised as Critical National Infrastructure.

We write as a group of some 30 trade and professional organisations representing £100bn of the UK's food supply, production and distribution chain, enforcers and port health. The UK agri-food sector [accounts for](#) 13.4% of GB's employment, and the [food & drink industry](#) is the country's biggest manufacturing sector by turnover. It is therefore vital for jobs, the economy and UK food security that problems in this supply chain are urgently addressed.

We are deeply concerned by threats to GB food security, biosecurity and food safety that reflect many of the issues our member organisations have raised with Defra, including senior managers, over the gestation period of the BTOM, including having written directly to Rt Hon Steve Barclay the then Secretary of State on 25 January 2024.

We have to date received neither a response nor acknowledgement of our letter. We are therefore enclosing an updated version of the list of ongoing and current issues, all of which impact the flow of critical food ingredients and final product from EU-GB under BTOM. It is worth noting that the EU is the major supplier of many of the UK's food and ingredients, and that much EU-GB trade operates on a 'just-in-time' basis, often involving product with significantly shorter shelf-life than that arriving from other origins. Any disruptions to this EU-GB supply chain therefore pose significant risks to UK food security and need to be carefully managed, planned for and mitigated where possible.

It is vital that checks on imports are carried out effectively. Dover Port Health Authority (DPHA) is at the front line of our defences. They and others including ourselves have expressed major concerns regarding locating the BCP at Sevington some 22 miles away from the point of entry to GB at the port, with numerous turn-off points along the route, and the disconnect of the information flow between DPHA and Sevington. We would appreciate clarification on what practical measures have been, or are being planned to be put in place to minimise risks to biosecurity and public health protection.

DPHA have reported that funding for its front line defence against imports of illegal meat and surveillance for diseases such as African Swine Fever has been cut by up to 70%. If this is the case it would be wholly unacceptable to the members of this group.

This is a matter of huge significance relating to our nation's biosecurity, food safety and the ongoing ability of GB to trade.

Finally, we draw your attention to the magnitude of the costs of the current BTOM approach on top of post-Transition Period GB-EU trade complexity, which cannot be absorbed by businesses. The previous UKG in effect imposed food inflation from these costs on the British public.

As an indication of the scale of these costs, GB industry has since December 2020 spent more than £200m on completion of one single type of newly-required documentation (Export Health Certificates) to export products of animal origin to the EU, taking more than a millennium of certifier years to do so:

1 Dec 2020 - 30 June 2024	
Food EHCs issued by APHA	1,026,786
Certifier hours (@2h/cert)	2,053,572
Certifier days (8h)	256,697
Certifier years (253d)	1,014.6
£m certifier cost @£200/EHC	£205.4
(excluding FBO admin, software, staff, waste, lost business)	
£bn new sales required to pay for certifier cost	£ 10.268

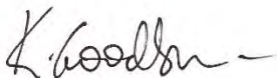
Such costs and time demands are now being imposed on EU suppliers of food to GB.

There is also significant uncertainty as a result of how the BTOM has been implemented and communicated thus far, which adds complexity and hampers business planning, resulting in some EU suppliers simply opting to supply markets other than the UK.

We await your response to these material issues.

This letter is being copied to Ministerial colleagues, MPs for port constituencies and senior civil servants.

Yours sincerely,



KARIN GOODBURN MBE HON FIFST
Chair – SPS Certification Working Group

Encs. BTOM issues requiring resolution to protect EU food and biosecurity

Cc:	Daniel Zeichner MP	Minister of State (Minister for Food Security & Rural Affairs)
	Rt Hon Baroness Hayman of Ullock	Parliamentary Under Secretary of State
	Emma Hardy MP	Parliamentary Under Secretary of State
	Rt Hon Jonathan Reynolds MP	Secretary of State for Business and Trade
	Joanne Bradshaw	Defra Programme Delivery Director – BBTP
	Emily Miles	CEO, Food Standards Agency
	Margaret Whitby	Head of Policy, Border Strategy & Design, Cabinet Office
	Sojan Joseph MP	Ashford
	Satvir Kaur MP	Southampton Test
	Amanda Martin MP	Portsmouth North
	Stephen Morgan MP	Portsmouth South
	Darren Paffey MP	Southampton Itchen
	Mike Tapp MP	Dover and Deal
	Karl Turner MP	Kingston Upon Hull East



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Chair: Karin Goodburn MBE, cfa@chilledfood.org

BTOM Issues to be Resolved (Updated 25 July 2024)

Although we are very supportive of individual civil servants and the Chief Veterinary Officer (CVO), Defra (and Cabinet Office - CO) lack of concerted timely action presents the following disruption to GB food and biosecurity/trade:

1) BORDER CONTROL POSTS (BCPs)

- (a) **Reports that Dover Port Health Authority (DPHA) are to have government funding cut significantly by up to 70%**

Impact: GB biosecurity and food safety may be compromised with massive economic, trade and reputational consequences.

Solution: DPHA and border force need to be adequately funded to ensure they are able to continue protecting the UK's biosecurity from illegal food trade.

- (b) **Lack of detail on UKG measures to ensure security/prevent offloading of uninspected/illegal food en route from Dover to Sevington 22 miles away**

Impact: GB biosecurity and food safety could be compromised with massive economic, trade and reputational consequences.

Solution: Detail is required now from Defra on protective measures. GPS tracking of vehicles coupled with random checks and a stringent inspection regime is needed.

- (c) **General BCPs' opening hours are too restricted to accept 24/7/365 imports, lack of 24/7/365 helplines.**

Impact: Perishable and other foods are being delayed entry, resulting in food waste and financial loss. Businesses cannot effectively plan trade routes.

Solution: BCPs' opening hours need to better match trade requirements to assure GB food security, reduce wastage and negative economic impact on GB importers. BCP helpline details need to be published.

- (d) **Variability in scale of charges at BCPs (£10-43 per 'consignment')**: Significant variation in charges between BCPs. No means of tracking or auditing charges accumulating for retrospective billing, for what items/codes. **Definition of "consignment"** is different for Common User Charge (CUC) (= per commodity code) from SPS issues (= per Health Certificate), meaning **multiple times the expected cost for mixed loads entering GB, potentially rendering imports financially unviable and/or adding to food price inflation**. In addition, the CUC disproportionately burdens SMEs, who are paying the same amount for 5 commodity lines as a big importer with 50 commodity lines, so the amount smaller importers are paying per tonne is much higher than those importing bigger volumes.

There is also no clarity on exactly when importers will be charged (the guidance currently states *'the first invoices will be issued...no sooner than 12 weeks after April 30th 2024'*), or how much they will owe, meaning businesses may be hit all of a sudden with a large bill. This hampers business preparation and cashflow management, and disincentivises trade to GB.

Impact: businesses cannot budget for unknown charges. EU exporters have stated that on expiry of current supply contracts they will review whether to continue to supply GB given the new regime and associated issues.

Solution: UKG needs to provide clear, transparent, granular and auditable real-time data on all charges to enable companies to track, budget and plan. Financial and food security impacts must be minimised as companies will otherwise take commercial decisions as to whether it is financially viable to export to GB. Note that private-run BCPs are not capped and charges vary greatly. **There needs to be full transparency of charges, of audit trails and an appeals process.**

- (e) **Hygienic design (lack of raw/cooked segregation) reported to be insufficient** to prevent cross-contamination of cooked foods, and sampling protocols not specifically designed to reflect the nature of the food being tested (e.g. ready to eat).

Impact: The potential to compromise food safety.

Solution: Review design specification and ensure that it meets industry High Care/High Risk standards to protect food safety. No design specification has so far been received despite requests. Standards need to meet those of food production areas.

- (f) **Destructive Food Sampling and Lack of UK Laboratory Capacity**

The cost and method of sampling of bulk materials at BCPs resulting in disposal of large quantities of goods does not appear to have been considered. Port health authorities (PHAs) need to take representative samples when completing inspections, with set numbers of tests being done in the case of Intensified Official Controls. This results in the goods being rendered unusable from a food safety perspective and requiring immediate disposal at the BCP.

Impact: The importer of the load (UK business) will have to pay unspecified sums for samples and analysis to be undertaken, cover the loss of product through sampling, arrange and pay for the disposal of the sampled food, then cover the cost of replacing the food which had been lost from e.g. their just in time short shelf life supply chain. Not only will this create significant food waste at the BCP but it will add such cost to product that it will make it unfeasible for current supply chains to continue without significant cost increase on raw materials and ultimately final product. This has to be passed on to the final consumer as its magnitude is too great to be absorbed by businesses.

Industry has been advised that samples sent for analysis may need to be sent to the EU (usually Germany) as there is insufficient UK laboratory capacity. This is often done by the UK receiving laboratory without the knowledge or consent of the originating food business. This requires raising an EHC to export the sample to the EU laboratory, representing additional cost, delay, loss of shelf life, and viability of the use of the foodstuff, as particularly if short shelf life, results can also be too late to be of any practical value. This applies to microbiological, chemical and authenticity analysis.

Ultimately for incoming goods this lack of UK laboratory capacity results in loss of the country's major suppliers, thereby affecting GB food security.

The July 2024 Annual Science Update from FSA's Chief Scientific Advisor Robin May highlights the laboratory capacity issues in section 7: <https://www.food.gov.uk/print/pdf/node/23756>.

Solution: UK lab capacity must be adequate to meet the new sampling demands.

Recognition is needed of producer hygiene standards and controls, sampling frequencies must be appropriate and risk-based, with sampling approaches being designed to not create unnecessary food waste.

(g) **Communications on consignments being imported into GB**

- (i) **GB Protocol on Intensified Official Controls (IOC) communications not made available.** IOCs occur when goods are stopped after failing sampling tests. Increased sampling of subsequent loads/consignments takes place to check compliance. For GB-EU exports no information is given to the vehicle driver, haulage firm, exporter or importer as to what foodstuff has failed or why, or the delay timescale, but instead it is notified to the Competent Authority of the exporting country, for them to communicate with the exporter for them to communicate onwards. This lack of direct communication is critical for multi-product loads as the whole vehicle is delayed and since it is not advised what the failure is, rectification is extremely difficult, resulting in further stoppages. It is understood that a EU-GB trade IOC protocol is being drafted by Defra but it has **not yet responded to industry contact highlighting its criticality to minimise EU-GB flow delays and therefore risk to GB food security.**

Impact: Absence of such a protocol designed effectively would delay imports to GB, potentially losing short shelf life goods (wasted), compromising GB businesses' viability, employment and GB food security.

Solution: Defra to engage with industry now to address this issue.

- ii) **Notifiers and nominated contacts to receive additional messaging providing updates on consignments being imported into Great Britain**

Improvements that have been announced this month regarding IPAFFS for CHED PP (Plant Products) (16/7/24, <https://freshproduce.org.uk/news/ipaffs-messaging>) **need to be extended to all food types as a matter of urgency.**

For plant products, notifications are now being made directly to the person responsible for the notification and nominated contacts mentioned on the CHED PP via email and SMS throughout the journey of consignments, being sent 2 hours before estimated time of arrival confirming whether the consignment is required to attend a BCP or control point (CP) for inspection; whether the inspection is complete; whether the consignment is being held; or whether there is no need for an inspection. This messaging improvement needs to be extended to all products of animal origin to expedite information flow and reduce delays.

- (h) **Need for improvement of inspection system, and driver facilities**

TLN, the operators' association for Dutch professional road haulage, has recently written to the EFRA Committee setting out disruptive impacts of BTOM arrangements, focusing on 6 areas:

1. Inspection process and supply of information
2. Loading and unloading at BCPs
3. Invoicing
4. BCP Opening hours
5. Damage and liability
6. Driver waiting times and driver facilities

Regarding this last point, drivers experience long waiting times for inspection to be completed and consequent disruption of their schedules, leading to possible violation of driving and rest time legislation. Drivers are not allowed to leave the premises and have to hand in their vehicle keys. Most of the time at Sevington no food or drink is available, often not even a cup of coffee can be obtained in waiting rooms. Sanitary facilities need to also be improved. Driver facilities are not of the standard provided in the EU.

Impacts: Drivers and representative organisations have indicated that they will not be willing to come to GB in the absence of adequate driver facilities. This will affect GB food security negatively.

Recommendations

- Set up adequate facilities for drivers.
- Involve drivers in reloading after inspection.
- Indicate formally that inspection has taken place, so that any subsequent enforcement body can take this into account in their checks.

2) GROUPAGE

a) Groupage Not Fully Facilitated under BTOM – will curtail imports, increase food inflation & reduce GB food security

The previous efficient EU-UK just in time supply chain encompassed regular, small volumes of short shelf-life EU goods transported to UK in the same vehicle (multiple pickups and multiple drop offs) to maintain freshness and minimise food waste whilst retaining traceability. **This is not facilitated by the new BTOM**, which only allows for multiple pickups of the same category of products to be on the same export health certificate (EHC). **The new BTOM groupage model is of no benefit if goods are going to different UK destinations, even within the same business and with full (often digitised) traceability maintained, as they will still need multiple EHCs and other new bureaucracy.** Whilst we accept the requirement for health certification, no facilitation or easing has been made for multiple drop offs in the BTOM groupage model. Previous direct delivery supply chain models that were in place and honed over many years to maximise usable shelf life on receipt of goods and efficiency across the industry have had to be reviewed, and costs of materials will have to increase. This will inevitably have to be passed onto the retailer and finally the consumer. In the chilled prepared food sector, the sites to which multiple drop offs are made all operate to the same technical standards and supply the same retailers (under their own labels), and all come under one company, but will be geographically based around the country from Kent to Scotland.

Impact: Wholesale markets importing small quantities of mixed consignments overnight for early sales will be significantly impacted by the unresolved groupage issue of SPS checks. Multiple consignments of high, medium and low risk goods for a range of customers will

be on vehicles where delay will mean that goods will miss morning trade. It will mean that SMEs are adversely and disproportionately affected.

Another example is of 2 pallets of short shelf life material (e.g. Continental meats, cheese etc) ordered by the GB food business operator (FBO) several times a week to meet supply chain and shelf life requirements. With the new BTOM arrangements these 2 pallets of the same product, from the same supplier, from the same batch, transported on the same vehicle, imported by the same importer, declared on the same import customs clearance by the same UK legal entity, and supplied to the same UK company, will now need 2 EHCs because they will be going to 2 different UK addresses, both being manufacturing sites of the same importing legal entity. This doubles the associated EHC costs, doubles the prenotification requirements, doubles the chance of being selected for inspection and doubles the cost of the Common User Charge as it will be seen as 2 separate consignments. 3 pallets of same product to 3 destinations will triple the cost, and so on. This is the very real situation now for products that have been previously transported and imported over the last decade with no requirement for additional cost or paperwork. The goods have not doubled in their biosecurity risk to the UK.

This will add **significant cost to small volumes resulting in price/kg increases which will have to be passed onto retailers and end consumers, increasing food price inflation, and potential loss of the EU supplier owing to new bureaucracy and costs.**

Solution: Trusted Trader pilots and scheme designs must be reviewed to ensure that businesses which have the necessary systems in place to assure traceability are not blocked from using groupage in the form that has been established and successfully managed over many years.

3) EXPORT HEALTH CERTIFICATES (EHCs) & PHYTOSANITARY CERTIFICATES

(a) GB EHCs and/or guidance for EU-GB trade are being changed without notice and not circulated to industry to enable preparation for any new compliance requirements.

Enforcers are advised of the changes but industry, which is required to comply, is left in the dark until goods are stopped at the border.

Impact: GB food businesses lose trade and find their goods becoming waste or needing to be returned to the supplier if possible.

Solution: Implement a transparent mechanism for the updating of EHCs with a dedicated Team and/or contact to co-ordinate with Stakeholders, ensuring that there is more notice and communication to industry when EHCs for import into GB are amended.

(b) EU/EFSA Official Vet (OV) capacity issues have been raised by industry for >24 months with Defra but have not been addressed, nor has industry been advised of any UKG contingency measures. Core issue is lack of 24/7/365 EU/EFTA OV availability - they are civil servants primarily working office hours and not weekends/holidays, unlike in the UK where they are private. Inability and/or delays (est 24-72h) in OVs signing EHCs **compromises flow of medium risk foods (e.g. meat, meat products, live fishery products) from EU-GB and potentially loss of short shelf life foods from the GB ingredient supply chain.** This has earlier been reported to be expected to result in a major GB receiving factory's closure 2 days a week. Certifier capacity is also an issue with exports from GB.

Impact: GB food business viability and employment, reduced GB food security.

Solution: EU Member States (MS) must act to provide cover or they will lose trade with GB. GB businesses cannot easily establish alternative validated and accredited supply chains.

(c) One day prenotification requirement has compromised GB's 24/7/365 food supply chain

The UK imports >1.5 million tonnes p.a. meat and poultry and is absolutely dependent on imports, e.g., 80% of UK-sold beef comes from Ireland. GB's requirement for one working day prenotification is unfeasible for just in time supply to GB of perishable short shelf life fresh foods/ingredients arriving from the EU. A one day delay to exportation can mean a 20% loss of shelf life, ultimately rendering the food unsaleable. EU suppliers are not commercially able to lose this time so are expected to decide to take commercial decisions on current supply contract expiry whether to continue to try to supply GB, especially when taking into account certification and other new administration costs. In addition, due to the just-in-time supply chain for EU-GB trade, many exporters will not have all of the data required 24 hours ahead of exportation of multiple consignments on a vehicle to enable them to complete prenotification that far ahead. Although we understand PHAs have had the ability to derogate in certain circumstances from April 2024, this is a critical issue for food supply where Defra has stipulated one working day with no possibility to derogate.

Impact: Short shelf life food/ingredients lost to waste while awaiting exportation to GB. GB food security, impact on GB FBO viability, on employment and food availability.

Solution: PHAs to make better use of derogations to allow shorter prenotification periods, e.g. to 4 hours.

(d) Plant & Plant Products – Fruit and Vegetable Easement Ending

There are now a significant range of fresh fruit and vegetables being added to the Medium Risk A category within the BTOM. Whilst these products have had an easement, this is intended to end (subject to Government sign off) on 31 January 2025.

This change will affect up to 3 million tonnes of product coming into the UK from the EU, many of which are in groupage vehicles over multiple consignments.

Impact: Industry estimates that the additional costs it faces from inclusion of these commodities in in the medium risk category will be approx. £200m based on new documentation and inspection charges as well the Common User Charge. There is also concern that EU plant health officials may not have capacity to generate the required phytosanitary certificates for the significant volumes of products that are included in the Medium Risk A category. Delays at the border will be inevitable given that 3% of a range of products will be inspected from 1 Feb 2025 in addition to products already going through BCPs and CPs.

Solution: An effective and widely communicated solution to the inspection process for goods arriving in groupage vehicles. There must be an opportunity for Authorised Operator Status schemes to be fully implemented prior to 1 February 2025 (the deferred date for the newly revised Medium Risk fruit and vegetable commodities) to ensure minimisation of delays and costs introduced as a result of using a single BCP. UKG needs assurances from EU plant health officials that the deferred 31 January 2025 deadline is achievable for creating the significant number of phytosanitary certificates required by the UK.

(e) Change of Tariffs Without Notice Reveals Trade Tariff Look-Up Tool Inadequacy

A recent query on import tariffs highlighted the inadequacies of this key UKG tool in assisting businesses with trade. The Trade Tariff Look-Up Tool is supposedly designed to help find commodity codes quickly and easily for goods being imported to, or exported from the UK and can be used to check if there's duty or VAT to pay or find out about suspensions or reductions. However, increasingly businesses are left struggling with a system which simply is not fit for purpose. On this occasion, the system did not even drill down far enough to determine the import tariff for something as simple as IQF onion. Clarification was eventually received from the relevant Government department, who were in this instance extremely helpful, but even they had to check back with their colleagues.

Impact: Trade cannot continue when payable tariffs are not known.

Solution: The Trade Tariff Look-Up Tool needs to fulfil the functions for which it is intended without necessitating direct contact with civil servants.

(f) Food Product Risk Categorisation Methodology Transparency

Despite having requested this repeatedly since the approach to BTOM was announced, information on the risk assessment methodology, criteria and data sources used to establish whether a foodstuff/commodity is categorised under BTOM as low, medium or high risk has not been shared with industry. It is imperative from a food safety, biosecurity and logistics standpoint for importing businesses to know what the basis of risk categorisation of their commodities/foods are, so they not only know where they stand in terms of administrative requirements, but they can take appropriate steps to de-risk their supply chains. This would thus ensure continuity of supply, prevent loss of incoming materials as waste, and even prevent suppliers walking away from GB as a customer given the additional bureaucracy and associated costs with non-low risk categorisation. Allied with this are the notice periods UKG has indicated will apply to changes in risk categorisation (4-6 months depending on the commodity), which may mean loss of seasonal commodities from GB.

Impact: GB food security, impact on GB FBO viability from loss of raw materials, on GB employment.

Solution: UKG (Defra and Food Standards Agency, FSA) to publish the risk categorisation methodology, criteria and data sources taken into account, for industry to be able to mitigate business risk and minimise loss of incoming raw materials.

4) LACK OF CLARITY ON FEBRUARY 2025 ORGANICS REQUIREMENTS AND PROCESSES

Issues to be addressed include:

- Existing infrastructure and systems are not geared up to cope with new requirements
- MS will struggle to issue Organic Certificates of Inspection (Cols) in the absence of digitisation
- MS readiness / system capabilities will differ. It is known that Spain is not yet ready for potential changes
- It is not known what system will be used for Organics – TRACES?
- Spanish growers and authorities do not operate 24/7/365

- The transit time is too short to pre-notify PHAs the required number of days before arrival
- UK PHA turnaround ability is questionable since it is unclear whether they have capacity to approve CoIs quickly in the absence of digital certification. There is therefore a risk of significant delays at ports, which is critical to perishable foods. It is understood that PHAs are processing CoIs by email, creating strain on services
- A CoI will be required per destination. Fees are ~£36 per CoI and the PHA fee £50. Multiple 'First Consignees' on a trailer would incur significant costs
- Receiving depots (first Consignees) will be impacted by endorsing CoIs
- Organic imports (question of who is the importer of record) will impact 76% of retailers' trailers
- Are Defra considering an Approved Organic Trader approval akin to PHEATS?

5) **AUTHORISED OPERATOR SCHEME (AOS)**

(a) **Timeline of introduction of the AOS**

SPS checks will first move from Place of Destination (POD) to Border Control Posts (BCPs) or inland Control Points before the AOS is in place for growers. The SPS checks for EU fruit and vegetables will commence from 1 February 2025 but the AOS scheme will not be operational until June 2025. The scheme is currently in the pilot scheme and there are no assurances that the scheme will be launched post pilot.

For businesses to have AOS status, they must be a registered Control Point. The authorisation and registration process by the Animal and Plant Health Agency (APHA) can take a number of months and then the training process will take additional time.

Control Point inspections by APHA Inspectors can only be performed between 7am – 7pm but deliveries are usually received overnight between 7pm and 7am. There is a service level agreement (SLA) that plants and plant materials will be inspected at Control Points within 6 working hours of when goods are presented for inspection.

Impact: Goods will be forced to go through BCPs and CPs to be inspected by APHA officials for their SPS checks. This will put a huge strain on resources when there is an alternative of trained AOS staff conducting their own checks. This may cause significant delays at BCPs as a result of there being a backlog of checks at the border.

Goods at CPs cannot be inspected upon arrival if delivered overnight and goods cannot be released until inspected (or released if not inspected after 6 hours). This means that goods may miss delivery slots.

Delay to the process will increase cost of product, risk product shortages on shelf and increase food wastage through product spoilage.

Solution:

- In the short term, inspection hours for Control Points should be 24/7 or 7pm to 7am where required.
- The AOS launch should be brought forward to coincide with the easement date for fruit and vegetables ending (31 January 2025) OR the easement date delayed until AOS is ready to launch.

(b) **Groupage of Plants and Plant Products (Ornamental)**

A very high proportion of ornamental plants come from the EU on groupage transport with mixed loads heading mainly to retailers but with some plants destined for growers (same types of plants but for different distribution). When one product within a consignment requires a physical

check and the others do not this may mean that the entire consignment must be diverted for a check. Under the current proposals most vehicles would have to go via a BCP unless the European hauliers keep growers' and retailers' plants on separate vehicles. If they do, this will make the UK grower's transport from the EU difficult to obtain and very expensive because the volumes are relatively small (but high value per trolley).

Impact: Reduction of the range of plants available to the GB consumer, further increase in retail prices, further reduction in UK production as growers will be unable to source propagation material (young plants and liners) from the EU.

Solution: Currently the inspection regime is not fit for purpose for ornamental growers that rely on groupage. It needs to be revised to facilitate this trade to maintain supply.