

BVA feedback to the Cabinet Office Border Target Operating Model draft

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health, animal welfare, public health, regulatory issues, and employment matters.

Introduction

- 2) We welcome this opportunity to give feedback to the Cabinet Office on the Border Target Operating Model (BTOM) draft. Since the UK left the European Union and we became responsible for designing and implementing our own border arrangements we have called on the UK Governments to maximise the opportunity to develop an improved regime of sanitary and phytosanitary controls which are so essential to maintaining biosecurity, public health, and protecting animal health and welfare. Our response is with a focus on live animals and products of animal origin, rather than the proposed safety and security controls or other matters which do not directly concern the veterinary profession.
- 3) The numerous postponements to the introduction of some checks have been the cause of considerable concern and we repeatedly called on the UK Governments to provide reassurance that delays would not impact on our ability to protect the UK from disease incursion. A robust import controls regime is the key line of defence to help protect against diseases not currently present in the UK, such as African Swine Fever (ASF), a fatal and highly infectious disease of pigs. The advance of ASF across the continent, having moved west across Asia, is extremely concerning, with detection as near to the UK as Belgium.¹ An assessment² of the ASF outbreaks in China between August 2018 and July 2019 showed a total economic loss that accounted for 0.78% of China's gross domestic product in 2019. We are pleased to see the recognition that an outbreak of African Swine Fever would be a fundamental threat to the viability of our pig industry in the case study within the draft.
- 4) We welcome the commitment to invest more than £1 billion in border transformation as well as the data driven approach to support a more targeted, risk-based system underpinned by evidence. We also welcome the commitment to clear implementation milestones between the end of October 2023 and the end of October 2024. However, the success of a data driven approach hinges on full digitisation, and we are concerned that there will be a period of operation before such digitisation is in place. Although the commitment to the delivery of digitised export health certificates in 2024 is to be welcomed we would urge government to do everything possible to ensure that such a key milestone does not slip.
- 5) Alongside traders, ports, port health officials, logistics and transport companies and technology firms, vets will also be vital to the delivery of the new approach, and we look forward to ongoing engagement over the coming weeks and months.

¹ Updated Outbreak Assessment #10 African swine fever in Europe (Eastern Europe & Belgium) 23 March 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874897/asf-easteurope-update10.pdf

² Shijing et al (2021) African swine fever outbreaks in China led to gross domestic product and economic losses Nature Food volume 2, pages802–808 (2021) <https://www.nature.com/articles/s43016-021-00362-1>

The new model for Sanitary and Phytosanitary controls

- 6) While the proposals have been co-designed with stakeholders, those stakeholders are primarily importers, the food industry, traders, and port authorities, with a significant driver being the reduction of friction to trade. Whilst this is clearly important, reduction of friction should not be to the detriment of sanitary and phytosanitary matters.
- 7) We warmly welcome the recognition of the importance of a coherent border control regime across the UK and strongly support the collaboration between the Scottish, Welsh, and UK Governments to develop the new model for the import of sanitary and phytosanitary goods. Shared governance and expertise are critical to ensuring that the model can respond to emerging threats.
- 8) We support the risk-based and targeted approach to border controls and welcome the proposed categorisation derived from a scientific assessment of the biosecurity and food safety risk that each commodity poses, whilst also taking into account the risk associated with the region or country of origin. We understand that risk factors will be reviewed regularly, with commodities moved into higher or lower risk categories to reflect changing levels of risk. With this in mind, it is essential that there is capacity and capability in government to perform this review process so that changes to risk can be identified and acted upon promptly. To be successful, the risk assessment must be dynamic, agile, and evidence based.
- 9) We understand that the new model will incorporate a pilot of new sanitary and phytosanitary assurance schemes for authorised Trusted Traders, co-designed with industry before a go-live in January 2024. We welcome the commitment to a robust and detailed evaluation of the pilots, that appropriately balances benefits to traders and the assurance of biosecurity and food safety, before any decision to scale up is taken. Government vets should play a key role in evaluation of the pilot schemes.
- 10) There are many steps in the food chain from farm to fork. Given the value of the food industry, it is unsurprising that the last decade has seen well reported cases of fraud where lower value meat has been presented as being higher value with a different origin. Such fraud can present a significant risk to UK biosecurity or food safety.
- 11) The proposed trusted trader scheme is fundamentally based on trusted importers who are often well removed from the source of products of animal origin. We are yet to be convinced that a trusted trader scheme based on trusted importers will be sufficiently robust. The drivers of fraud in the food chain are considerable and there is currently insufficient detail on enforcement in the proposals, including information on how a trusted trader might lose their status. It is also unclear how a scheme focused on trusted importers will build in safeguards against exporters which renege on their responsibility for sanitary and phytosanitary matters.
- 12) It is vital that a trusted trader scheme is itself trusted, particularly by our export partners. Without that trust, the proposed changes could have negative unintended consequences for the UK's export markets, including implications for Northern Ireland. The credibility of the scheme will depend not only on its design and how products are risk assessed, but also how well it is enforced, and what sanctions are in place. The process by which trusted traders can gain, maintain, and lose that status will be central to whether the scheme is held in high regard by our export partners.
- 13) Those responsible for achieving and maintaining trusted trader status will be employees with a conflict of interest rather than independent regulated veterinary professionals. The veterinary signature has huge value and is recognised internationally, and it is therefore vital that the trusted trader scheme incorporates veterinary certification such that it is accepted by our export partners. We look forward to further detail as the co-design progresses and the scheme is piloted.

BVA feedback to the Cabinet Office Border Target Operating Model May 2023

- 14) It will be important to engage official veterinarians (OVs) working on imports at Great Britain's ports, as well as EU vets involved in export work. In order to minimise disruption at UK borders and UK border control posts, it is important that they are provided with clear and timely guidance about any changes in certification requirements. The provision of facilities for goods entering the UK through the ports in Holyhead and Southwest Wales must also be prioritised.
- 15) It is also critical that the practicalities for OVs signing export certificates for goods re-exported from Great Britain are addressed. OVs must have access to the information they require to complete Export Health Certificates in a timely and accurate manner and there is still work to be done to ensure that processes are in place, access to data is automated, and certificates are digitised.

Conclusion

- 16) We welcome the commitment to a robust import controls regime to protect the UK from disease incursion, supported by investment in border transformation and a more targeted, risk-based system underpinned by evidence. We urge the government to ensure that full digitisation is achieved in line with the stated milestones and that the proposed trusted trade scheme is sufficiently robust before wider roll-out such that the UK is protected, and the trust of our export partners is maintained.