

BVA response to EFRA call for evidence on priorities for a UK-EU SPS Agreement

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 mission is to represent, support and champion the whole UK veterinary profession. We are a professional body and our members are individual veterinary surgeons. We take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) Vets play a vital role in certifying and supervising the import and export of animals and animal products. The expertise of vets is essential to safeguarding animal health and welfare, public health and food safety. In recognition of this, in January 2025, BVA published a policy position advocating for an EU-UK veterinary agreement.¹
- 3) We welcome the opportunity to submit evidence to the EFRA Committee's inquiry into a UK–EU Sanitary and Phytosanitary (SPS) Agreement.

What is a realistic timeline for the negotiation and implementation of an SPS agreement?

- 4) When determining the timeline, it is essential that the UK Government carefully balance two key factors:
 - a) the increasing risks to animal health, welfare, trade, and biosecurity associated with continued delay, and
 - b) the veterinary profession's ability to prepare for and support implementation.
- 5) From an animal health, public health and workforce perspective, there is a clear urgency to progress negotiations. In our 2023 evidence to the Cabinet Office on the draft Border Target Operating Model, we warned that repeated delays to the implementation of the UK's post-Brexit border arrangements posed serious biosecurity risks.² This concern was later echoed in the National Audit Office's (NAO) report on disease resilience. The NAO found that, despite a target of 100% checks at Border Control Posts (BCPs) for live animal imports by late 2024, only around 5% are currently inspected under pre-EU exit arrangements, with similar uncertainty over checks on animal products.³ Given the announcement that the final stage of BTOM implementation has now been cancelled, an EU-UK SPS Agreement is now urgently needed to help close these gaps, particularly through better surveillance, improved data sharing, and intelligence-led veterinary interventions. strengthen biosecurity.

¹ British Veterinary Association, BVA Policy Position on an EU–UK Veterinary Agreement (London: BVA, 2025), <https://www.bva.co.uk/media/6272/eu-uk-vet-agreement-policy-position-final.pdf>.

² British Veterinary Association, BVA Feedback to the Cabinet Office: Border Target Operating Model Draft (London: BVA, 2023), <https://www.bva.co.uk/media/5099/bva-feedback-to-the-cabinet-office-btom.pdf>.

³ National Audit Office, Resilience to Animal Diseases, HC 946, Session 2024–25 (London: NAO, 2025), <https://www.nao.org.uk/reports/resilience-to-animal-diseases/>.

- 6) The announcement of the new SPS framework adds further urgency, as it creates uncertainty around whether the existing model and its upcoming milestones will be implemented in the interim. Without clear direction and timely progress on a UK–EU SPS agreement, there is a real risk that existing weaknesses will persist, leaving the UK vulnerable to ongoing biosecurity threats. It is concerning and disappointing that the Government has decided to suspend physical checks on imports from the EU without the anticipated mitigations that might flow from a new SPS Agreement with the EU."
- 7) In order to mitigate these concerns, the UK Government should continue to implement the Border Target Operating Model for non-EU goods and ensure that its risk-based SPS and customs controls are also applied to EU imports until any UK-EU SPS Agreement is formally ratified and implemented. This would help progress towards consistent protection across all UK borders. The UK Government must also respond to the concerns raised within the NAO Report, outline tangible next steps to address these issues and provide evidence of progress.
- 8) The absence of a UK-EU SPS agreement has also placed significant strain on vets, particularly in relation to the volume of Export Health Certificates (EHCs) required, the complexity of border checks and the loss of access to critical EU disease surveillance systems such as TRACES, RASFF, and ADIS.
- 9) Clarity on negotiation and implementation milestones is essential to support forward planning and to manage expectations across the profession and the wider agri-food sector.
- 10) Once an SPS agreement is reached, its implementation will require sufficient lead-in time to allow government, industry, and vets to adapt. From our perspective, this preparation should include:
 - a) workforce planning;
 - b) ensuring veterinary certification processes and Official Veterinarian (OV) training reflects any new or amended requirements;
 - c) reconfiguring digital and data-sharing infrastructure to support disease surveillance, traceability and trade; and
 - d) providing clear guidance to vet practices and stakeholders on the practical implications for live animal movements and trade in products of animal origin.
- 11) Therefore, we strongly recommend that vets are involved consistently and from the outset to ensure the agreement is workable and delivers its intended benefits.

What opportunities and risks are posed by the introduction of dynamic regulatory alignment with the EU?

- 12) BVA supports the negotiation of a UK-EU SPS agreement using the principle of dynamic alignment.⁴ We believe this model delivers tangible benefits for veterinary capacity, trade facilitation, and biosecurity. However, any agreement must be designed carefully to preserve the UK's ability to maintain or exceed animal health and welfare standards and to act independently to maintain the UK's biosecurity in the face of emerging exotic disease threats.

Opportunities

- 13) Under the current system, the requirement for EHCs and border checks has placed

⁴ British Veterinary Association, BVA Policy Position on an EU–UK Veterinary Agreement (London: BVA, 2025), <https://www.bva.co.uk/media/6272/eu-uk-vet-agreement-policy-position-final.pdf>.

enormous pressure on the UK's veterinary workforce. In 2024 alone, more than 328,000 EHCs were issued, diverting substantial veterinary time and expertise away from critical animal health, welfare and biosecurity work.⁵ A dynamic alignment model could eliminate the need for EHCs, enabling vets to focus on frontline disease surveillance and implementing an effective, intelligence-led biosecurity strategy, while still ensuring safe and efficient movement of animals and products of animal origin.

- 14) A significant benefit of dynamic alignment will be renewed access to EU databases, which will enhance UK biosecurity. Dynamic alignment would likely enable the UK to regain access to EU-wide databases such as TRACES, RASFF, and ADIS. These platforms are essential for tracking disease outbreaks, verifying animal movements, and responding rapidly to biosecurity threats. Loss of access has weakened the UK's disease resilience and coordination with European partners. The NAO's recent report on animal disease resilience highlights the need to strengthen import checks, data access and sharing, and workforce capacity, all of which could be addressed, in part, through restored access to these systems.⁶ Leveraging this access within a UK–EU SPS agreement would significantly enhance surveillance capabilities and preparedness for emerging threats, including those driven by climate change and the rise of antimicrobial resistance (AMR), delivering broad benefits for animal health, public health, and environmental protection under a One Health approach.
- 15) Physical checks at BCPs are not only resource-intensive, but in some cases pose direct risks to animal health and welfare due to long delays, unclear routing or rejection of consignments. Additionally, the assumption behind physical checks that disease-carrying animals will be displaying signs of disease or ill health at the point of inspection does not take into account incubation periods of asymptomatic carriers or shedders of disease. Dynamic alignment would allow for mutual recognition of SPS standards and eliminate most of these checks, reducing stress and potential biosecurity risks for animals and operational uncertainty for exporters.
- 16) The UK should build on existing systems to create a centralised, accurate database for animal movements across all species. Currently, the Rural Payments Agency (RPA) and APHA maintain separate County Parish Holding (CPH) databases with no interface and inconsistent records. A unified database, including all livestock species and pet pigs, would improve disease surveillance, facilitate trade certification, and ensure compliance with EU requirements under an SPS agreement.
- 17) A shared SPS framework would also provide clarity and predictability for vets and exporters, reducing confusion and inefficiencies created by regulatory divergence.

Risks

- 18) Under dynamic alignment, the UK would be required to adopt EU SPS legislative changes on an ongoing basis. This could limit the UK's ability to protect its population and industry from diseases present in the European Union, and to unilaterally raise its own standards in areas such as labelling, welfare at slaughter, or transport. The agreement must therefore include mechanisms for upward divergence, perhaps drawing on precedents where EU Member States have secured derogations to apply higher standards.
- 19) Compared with Switzerland, which has just two designated entry points for goods arriving

⁵ Ibid.

⁶ National Audit Office, Resilience to Animal Diseases, HC 946, Session 2024–25 (London: NAO, 2025), <https://www.nao.org.uk/reports/resilience-to-animal-diseases/>.

from outside the EU (Zurich and Geneva airports), the UK operates a far greater number of entry points for goods from both EU and non-EU countries, across multiple land, sea, and air borders. This creates complexity in applying aligned SPS rules consistently, especially if requirements for third-country checks diverge from EU standards. Any agreement must be supported by adequate resources and infrastructure to ensure consistent enforcement.

- 20) Reducing the costs and administrative complexity of trade could make it more economical for retailers to import meat from the EU, potentially with lower welfare and medicine standards and therefore lower production costs, and with adverse consequences for the viability of the United Kingdom's livestock producers and processors; and hence for the country's food security in the medium to longer term.
- 21) There is also a specific concern that the EU may not recognise the UK's biosecurity and welfare standards for outdoor pig production, which accounts for around 40% of the UK pig breeding population. There is a risk that this may significantly restrict exports to the EU (maybe need to elaborate on this?).

How should traders, producers, businesses and policy makers prepare in sectors where regulatory divergence already exists or may emerge, such as in precision breeding, animal welfare and crop protection?

- 22) All stakeholders require sufficient time and guidance to adapt to new rules. The Government must provide clear guidance well in advance of implementation. This guidance would benefit from co-design with vets to ensure that regulatory changes are practical and do not unintentionally compromise animal health and welfare or trade flows.
- 23) Where regulatory divergence exists or may emerge, sectors should plan for the possibility of operating under two sets of frameworks, one for the domestic UK market and another for the EU export market. Businesses must be supported to manage this complexity through investment in guidance, veterinary certification training, and adaptable compliance tools.
- 24) As outlined within the NAO Report on Resilience to Animal Diseases, there are significant gaps within the UK's current traceability systems.⁷ Improvements in these systems will be required to ensure compliance with EU SPS requirements. Under a UK–EU SPS agreement, producers and businesses will need these systems to operate in both domestic and export markets, particularly where UK and EU rules diverge. Investment is especially urgent in sectors where current gaps exist, such as the equine and pig industries, where poor traceability can undermine disease control and increase the risk of costly border delays or consignment rejections. Strengthened systems will also support rapid disease response and help maintain market access.
- 25) Businesses, producers, and policymakers should track developments in EU SPS and related legislation to anticipate compliance requirements and adapt operations in time. Under a UK–EU SPS agreement, staying ahead of EU regulatory changes will be essential to avoid trade disruption and maintain market access, especially where UK rules diverge.
- 26) There is a need for further collaboration between private and public animal health sectors at multiple levels, including improving awareness of diseases, clarifying roles, and strengthening communication channels. The UK Government should work closely with each sector to understand specific risks and ensure coordinated preparedness. This may be supported by boosting the role and scope of the existing APHA-led 'expert groups' which

⁷ Ibid.

provide a template for effective species-level but sector-wide scoping and communication on animal health. Similarly, the AHDB's Pig Health and Welfare Council provides a valuable space for this further collaboration.

- 27) As highlighted in the NAO's recent report on the UK's animal disease resilience, gaps in preparedness and communication remain a key risk to effective response.⁸ This is particularly important for high-consequence diseases such as African Swine Fever, where early detection, clear role definition, and rapid communication are critical to prevention and control. The Government must also retain the ability to diverge on biosecurity-related legislation, where necessary, to safeguard the UK from disease incursions originating from the EU.
- 28) Where the UK wishes to retain or develop higher standards than the EU, the UK Government should actively negotiate mutual recognition or derogations to protect export access while allowing the UK to uphold its high standards of animal health and welfare.

How should the UK Government engage with industry stakeholders and devolved administrations to ensure the agreement aligns with wider agri-food and environmental goals?

- 29) Animal health and agri-food policy are devolved matters, with differences in disease resilience planning, veterinary workforce capacity and SPS rules across UK nations. For example, Northern Ireland already operates under EU SPS legislation via the Windsor Framework. Although the UK Government alone will negotiate the details of the agreement, the implementation will require action in devolved areas such as animal health, farming and biosecurity. Reflecting this, the Government must engage with devolved administrations and industry from the outset to align objectives, address sector-specific risks, and ensure practical delivery.
- 30) There should also be collaboration with the devolved administrations to ensure a cohesive approach to disease control. The recent delayed communications from Scotland and Wales in relation to the whole-England Bluetongue Restriction Zone (BTRZ) illustrate the potential risks and confusion caused when messaging is not aligned across the four nations.
- 31) Vets play a vital role in the implementation of SPS measures. Government must involve the veterinary profession at all stages of negotiation and implementation to ensure measures are practical, deliverable, and do not create unintended consequences. Meaningful consultation will help safeguard the agreement's integrity while enabling vets to protect animal health and welfare.
- 32) The UK Government should work closely with specific industry sectors and species-specific veterinary organisations, including the:
- Association of Government Vets
 - British Cattle Veterinary Association
 - British Equine Veterinary Association
 - British Small Animal Veterinary Association
 - British Veterinary Poultry Association
 - British Veterinary Public Health Association
 - British Veterinary Zoological Society
 - Laboratory Animals Veterinary Association
 - Pig Veterinary Society

⁸ Ibid.

- Veterinary Public Health Association

in disease contingency planning. Collaboration with these groups, particularly in high-risk sectors such as pig production, will be essential to ensure that any new agreement addresses pressing concerns around notifiable diseases being imported from Europe, including the threat of African Swine Fever.

- 33) While there are financial implications to improving disease surveillance networks, data collection, and sharing platforms, there is a clear opportunity to work with the veterinary profession and key stakeholders to strengthen these systems. This should include developing new approaches to data collection and feedback, optimising the skills of the veterinary workforce for outbreak response, and working with all sectors of the profession to better understand risks. Collaboration at both national and international levels would allow the UK to benefit from established surveillance mechanisms and data, directly supporting the objectives of a UK–EU SPS agreement
- 34) Clear and consistent messaging from the Government is critical to avoid causing errors or delays which could lead to potential animal welfare issues. To mitigate these risks, stakeholder engagement should include the early publication of clear guidance, co-developed with industry, and coordinated across the devolved nations to ensure alignment and avoid confusion.

What could the implications of an SPS agreement for trade and border controls be, including border infrastructure, resources, biosecurity, trade friction, growth and the treatment of imports from non-EU countries?

- 35) Dynamic alignment through an SPS agreement would result in a significant reduction in trade friction with the EU. Dynamic alignment could remove the need for EHCs and most physical SPS checks for trade with the EU. This would lower costs, improve efficiency, and boost agri-food exports. A reduction in checks on low-risk EU imports would free veterinary and enforcement resources to focus on higher-risk imports from non-EU countries, strengthening biosecurity.
- 36) Robust controls for imports from non-EU countries will still be required and would need to be managed without compromising EU-aligned SPS processes.
- 37) Access to EU systems like TRACES, RASFF, and ADIS would allow more effective surveillance and faster response to disease threats.
- 38) However, increased trade flows without checks must be matched with robust surveillance and intelligence-led enforcement. This would be essential since, in the absence of Export Health Certificates (EHCs) the system relies on trust that, for example, products of animal origin truly originate from a given health-controlled area. The higher number of UK entry points compared to Switzerland creates a greater operational challenge for the consistent application of SPS measures.
- 39) It is also critical that the UK Government continues to have robust biosecurity measures in place for trade from non-EU countries.

How might an SPS agreement affect the UK's internal market, particularly considering regulatory divergence across the devolved nations?

- 40) An SPS agreement must help reduce internal trade barriers between Great Britain and Northern Ireland, by ensuring the easing of the movement of goods currently subject to EU

SPS rules under the Windsor Framework. This could reduce costs and administrative burdens for businesses moving agri-food goods to and from Northern Ireland.

- 41) The NAO has identified limitations in the UK's current disease resilience that will need to be addressed, particularly as the EU may scrutinise these areas in light of the report. The NAO found a "mixed picture" at local level in how well local authorities discharge their animal health duties, often because animal disease control is competing with other statutory priorities where capacity and financial resources are limited.⁹ These constraints could be exacerbated by the additional expectations of an SPS agreement, putting further pressure on enforcement and veterinary resources unless properly resourced.
- 42) The SPS agreement should align with domestic programmes such as the Animal Health and Welfare Pathway, ensuring that measures are consistent across all nations and support long-term animal health improvement.

What impact could the proposed SPS agreement have on upcoming Defra agri-food and environmental strategies, such as the Land Use Framework, Food Strategy, Farming Roadmap, and efforts to improve farming profitability and sustainable growth?

- 43) By reducing trade friction and certification costs, an SPS agreement could improve profitability for UK farming businesses. Lower administrative burdens could free up time and resources for investment in sustainable practices.
- 44) Dynamic alignment would give the UK access to higher EU animal health and welfare standards where these exceed current domestic rules. This supports the ambitions of the Farming Roadmap and Food Strategy to maintain high welfare standards while growing the sector.
- 45) Improved access to EU surveillance systems would enhance disease prevention and control, protecting livestock productivity and reducing the environmental impact of disease outbreaks. This aligns with One Health principles and the objectives of the Land Use Framework.
- 46) While dynamic alignment can bring many benefits, it is important that the UK retains the ability to go beyond EU minimum standards in areas such as labelling, transport, and welfare at slaughter. This would ensure the SPS agreement complements, rather than limits, the ambitions of Defra's environmental and welfare strategies.

⁹ National Audit Office, Resilience to Animal Diseases, HC 946, Session 2024–25 (London: NAO, 2025), <https://www.nao.org.uk/reports/resilience-to-animal-diseases/>.