

BVA additional feedback on Defra UK-EU SPS Agreement Industry Stakeholder Information Forum

03 December 2025

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 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 and welfare, public health, regulatory issues and employment matters.
2. We welcomed the opportunity to provide views on the SPS Agreement. We have published a [policy position](#) on what we think should be considered in any EU-UK veterinary agreement which may be useful for you to consider. The key points relating to an SPS agreement and our concerns around biosecurity have been included in the response below.
3. 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.

SPS Measures

4. SPS measures protect humans, animals, and plants from diseases, pests, or contaminants. We consider that SPS measures form a vital part of the UK's protective biosecurity and assurance framework and must not be seen solely as a barrier to trade that needs to be overcome. BVA has consistently advocated for measures that support the veterinary workforce while safeguarding animal health and welfare.
5. When considering an agreement with the EU that aims to align SPS measures to reduce barriers to trade and improve animal welfare, the UK must consider how practical it would be to comply with EU regulations. Currently, EU Animal Health Regulations require all farms producing animals or products of animal origin for trade within or export to the EU to have regular veterinary visits. From December 2023 all EU producers sending animals to market or to slaughter within the EU have been required to demonstrate that a veterinary visit has taken place in the past 12 months. This requirement should be relatively easy for most UK farmers to comply with in the medium-term given the move towards Animal Health and Welfare Pathways throughout most of the four UK Nations; for example the current English Health and Welfare Pathway "offers farmers funding for an annual visit from a veterinary professional of their choice to consider the health and welfare of their animals"
6. BVA believes that annual veterinary visits have clear potential health and welfare benefits; with the prospects of access to EU markets now offering an added incentive. However, the introduction of dynamic alignment would make this mandatory for all live-stock keepers, including those selling to, or supplying processors servicing internal UK markets only. Being required to implement some other EU standards in the UK could be problematic in other respects. For example, the EU has recently decreased the permitted maximum level of lead in ruminant animal products from 500 ppm to 200 ppm. Applying this lower-level UK-wide would present a particular challenge, given the geochemistry of the main livestock grazing areas. The UK government would therefore have to introduce the lower level (200ppm) into the entire UK domestic market or negotiate with the EU the possibility of operating to two different standards, one for domestic and one for export consumption. This is an example of an area where the right to apply divergence and flexibility and deviate from European legislation may be needed.
7. BVA supports the need for a regime of robust import controls as 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 viral disease that can be transmitted between pigs. We support a 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. However, while robust import controls are certainly one of the key lines of defence to protect against disease, BCPs are not always located on the most direct route between the point of departure and destination – meaning that livestock are potentially subjected to longer journeys and the risk of adverse welfare impacts than necessary were “point to point” transport permitted. The primary focus for animal disease prevention should be disease surveillance, data sharing and intelligence-led interventions that focus on best targeting physical inspections to identify and remove illegal POAO to prevent importing exotic animal disease and protecting the UK’s biosecurity.

Biosecurity

8. We must stress the importance of border security from a food import perspective. Recent reports from the National Audit Office on [Resilience to animal disease](#) published earlier this year, the Public Accounts Committee on [resilience to threats from animal disease](#), and the EFRA Committee findings on [Biosecurity at the border: Britain’s illegal meat crisis](#), all highlighted significant concerns around biosecurity and the UK’s ability to deal with a significant disease incursion. The NAO found that, despite a target of 100% checks at 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. The report also 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. These constraints could be exacerbated by the additional expectations of an SPS agreement, putting further pressure on enforcement and veterinary resources unless properly resourced. The EFRA Committee report revealed a lack of adequate border control enforcement when it comes to personal imports of meat and other products of animal origin, including dairy; weak intelligence networks; poor Government interdepartmental working; as well as the absence of a national strategy to manage the significant animal disease and public health risks posed by potentially contaminated products. The report raised particular concerns about funding cuts for Official Vets at Dover, alongside ministerial comments that appear to dismiss the vital role of vets in protecting biosecurity.
9. Government vets play a critical role in protecting the nation’s biosecurity but can only do their jobs effectively if they are supported by effective systems. Currently, veterinary capacity required to perform checks remains a concern. As part of a national action plan, we would like to see better support for vets through a data-driven and risk-based system that is fit for purpose. This should also include adequate resources for Official Vets and the agencies tasked with keeping borders secure, which is why we want to see the proposed 70% cuts to Dover Port’s budget for spot checks on animal products reversed.
10. A reduction in checks on low-risk EU imports would free veterinary and enforcement resources to focus on higher-risk imports from both EU and non-EU countries, strengthening biosecurity. Robust controls for imports from non-EU countries will still be required and would need to be managed without compromising EU-aligned SPS processes. Access to EU systems like TRACES, RASFF, and ADIS would allow more effective surveillance and faster response to disease threats. However, increased trade flows without checks must be matched with robust surveillance and intelligence-led enforcement and suitable resourcing of all Government agencies tasked with protecting the UK’s biosecurity. 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.
11. The UK must retain the right to act unilaterally to protect its biosecurity in the face of increased evidence of animal disease outbreaks in Europe (e.g. FMD, ASF) and altered disease risk status because disease risk is a dynamic and rapidly evolving threat. The impact of an outbreak of either FMD or ASF would be devastating. The ability to act unilaterally ensures the UK can respond with the necessary speed and flexibility. BVA believes there must be a mechanism within the SPS agreement that mandates close cooperation and information sharing with the EU, but which also includes an explicit clause that enables unilateral action when it comes to protecting the country from disease incursion. This clause must permit the UK to impose immediate, temporary restrictions in the event of a significant and rapidly escalating animal disease outbreak within the

EU. It must also allow us to act based on a UK specific risk assessment if the UK's Chief Veterinary Officer determines that the disease risk status has fundamentally altered and poses an immediate threat to the UK's biosecurity. This approach balances the desire for facilitated trade with the non-negotiable requirement of national biosecurity protection.