Department for Environment Food & Rural Affairs

Llywodraeth Cymru Welsh Government

Scottish Government
Riaghaltas na h-Alba
gov.scot

Date: 31st March 2022

Dear Sir/Madam,

Response to GB follow up consultation on a method for determining the frequency of risk-targeted plant health import inspections

Thank you for submitting views on the above consultation. This letter is to notify you of the outcome.

Recommendations

In May 2021, Defra, Scottish and Welsh Governments consulted on proposals to establish a risk-targeted inspection system in GB. Several stakeholders responded to this consultation. The responses received were generally supportive of a GB focused risk-based frequency of checks regime, although key concerns were identified. In response to this stakeholder feedback, the UK Plant Health Risk Group revised the methodology to apply to a much wider range of goods, including plants for planting as well as produce (e.g. fruit, vegetables and cut flowers). The revised approach will also apply equally to goods from all third countries from 1 July 2022.

This proposal has been adopted following the conclusion that imposing full checks on all categories of plants for planting would not be proportionate to the biosecurity risk when also considering the effects on trade. Therefore, the risk-based requirement for inspections has been balanced with the impact on regulators and on trade.

Background

GB Plant Health Services carry out inspections on consignments of imported plants, plant products and other objects to prevent the introduction and spread of organisms harmful to plants or plant products. They are crucial in protecting GB against risks arising from trade in plants and plant material. They protect our nation's crops, produce, trees and other plants from the risk of pests and diseases and help support the government's goal of leaving the natural environment in a better state than we found it.

The general principle is that all consignments of regulated plants and plant products (i.e. those which could pose a risk to plant health and which must be accompanied by a phytosanitary certificate) are inspected on arrival, or shortly thereafter. However, when the UK was part of the European Union, import trade pathways (i.e. a commodity type from a specific country) which were judged to pose a low plant health risk and which could demonstrate a good history of compliance could be inspected at a reduced frequency.

Higher risk material, such as plants for planting and potatoes, were excluded from consideration for any reduction in inspection level.

Summary of Responses

Eleven responses were received, these were from:

- British Association of Landscape Industries (BALI)
- Fresh Produce Consortium (FPC)
- Horticultural Trades Association (HTA)
- National Farmers' Union (NFU)
- Welsh Plant Health Evidence and Advisory Group
- Woodlands Trust
- Four private nurseries
- One private individual

Key Concerns and Government Response

Concerns were raised by several stakeholders about the risk categorisation of plants for planting and requesting lower levels of inspection for this group of plants (which includes plants, seed and bulbs).

- Plants for planting pose a higher risk to biosecurity than other regulated commodity types. For example, imported fresh produce will be consumed or destroyed unlike imported plants for planting.
- Finished plants for planting which are destined for the final user present a lower overall biosecurity risk than those intended for further propagation, growing on, or multiplying on a commercial scale. While the latter are not necessarily more likely to be infected, in cases where pests or diseases are present, there is greater potential for them to spread, multiply and then establish. This is a well-established principle[1],[2],[3],[4],[5] in relation to plant health risks, with controls focused accordingly.
- FPC asked that Plant Health Advisory Forum/industry representation is included in the annual review of frequencies and HTA asked that Defra continues to work with industry on the frequencies.

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[1] Eschen R, Douma JC, Grégoire JC, Mayer F, Rigaux L, Potting RP. 2017. A risk categorisation and analysis of the geographic and temporal dynamics of the European import of plants for planting. Biological Invasions, 19 (11),3243-3257.

[2] Kenis, M, Rabitsch W, Auger-Rozenberg MA and Roques A. 2007. How can alien species inventories and interception data help us prevent insect invasions? Bulletin of Entomological Research 97,489-502.

[3] Liebhold AM, Brockerhoff EG, Garrett LJ, Parke JL and Britton KO. 2012. Live plant imports: the major pathway for forest insect and pathogen invasions of the US. Frontiers in Ecology and the Environment, 10 (3), 135-143.

[4] Smith, R.M., R.H. A. Baker, D.W. Collins, A Korycinska, C. Malumphy, J. Ostojá-Starzewski, T. Prior, D. Pye, and S. Reid. 2018. "Recent trends in non-native, invertebrate, plant pest establishments in Great Britain, accounting for time lags in reporting." Agricultural and Forest Entomology 20 (4):496-504. doi: 10.1111/afe.12282.

[5] Smith, R.M., R.H. A. Baker, C.P. Malumphy, S. Hockland, R.P. Hammon, J.C. Ostojá-Starzewski, and D.W. Collins. 2007. "Recent non-native invertebrate plant pest establishments in Great Britain: origins, pathways, and trends." Agricultural and Forest Entomology 9 (4):307-326. doi: 10.1111/j.1461-9563.2007.00349.x.

- Amendments to the frequencies as a result of this risk targeted system will be discussed with the Plant Health Advisory Forum.
- These reviews will take place annually and will be coordinated by the UK Plant Health Risk Group.

One private nursery and NFU commented that consideration of biosecurity practices at individual businesses should also be considered.

- The system is focused on evidence which is readily available to the GB plant health authorities and is under their control. Practices and procedures by individual businesses prior to export fall outside the scope of the methodology for this reason. However, there is still benefit in sourcing carefully as, apart from the prospects of agreeing a reduced frequency level for the trade in question, careful sourcing means there is less likelihood of an interception being made, with resulting costs of re-export or destruction. As the system is focused on trades from particular countries, it is not possible to take account of biosecurity practices of the receiving business in GB, as this is unrelated to the risk profile of the trade before and during the export/import process.

NFU also requested that additional factors should be considered in the risk-based inspection regime, such as the implications of an outbreak, wider market impacts and possible implications for domestic biosecurity.

- These factors are all considered in GB's risk assessment process and directly influence the measures and requirements set to protect GB against specific pests and diseases.
- The proposed system focuses on risks associated with particular categories of goods, not just risks linked to specific pests and diseases. Plants can often be hosts of several pests and diseases, the distribution of which can change. Additionally, there will be as yet unknown risks. That's why is also important to look at intended use and the extent to which that will mitigate risks.

The Welsh Plant Health Evidence and Advisory Group suggested that the conditions under which plant passports and phytosanitary certificates are issued may need to be reconsidered if inspection frequencies decrease. They also enquired about research into the development of new inspection methods which utilise new and emerging technologies. Woodland Trust highlighted that moving away from 100% inspections across all commodities created, what they viewed as a biosecurity risk. They asked what steps government was taking to address this.

- The GB plant passporting regulations ensure high standards of biosecurity for the trade and our natural environment. Plant Passports ensure that plants and plant products are traceable throughout the supply-chain and attests to their compliance with plant health requirements such as freedom from pests, which is essential for maintaining biosecurity. Businesses authorised to issue plant passports are inspected annually by plant health authorities to ensure compliance with requirements.
- Phytosanitary certificates (PCs) are necessary for the import of regulated plants and plant products to GB. The issuing of PCs is carried out by a country's National Plant Protection Organisation (NPPO) and they must do this in compliance with International Standards for Phytosanitary Measure (ISPM) 12 Phytosanitary Certificates and with the phytosanitary import requirements of GB. Non-compliant import consignments are monitored and third countries may be audited, to ensure their phytosanitary regimes are sufficient to meet GB requirements.

- Targeted inland surveillance also takes place to monitor for the presence of controlled pests and facilitate a rapid response to findings as needed.
- The UK Plant Health Risk Group is continuously reviewing risks to plant biosecurity and identifying actions needed to mitigate the most significant risks. These include keeping our regulatory regime up to date, carrying out focused surveillance and inspections, contingency planning, research, and awareness raising as well as identifying areas where intervention would not be helpful or justified.
- We are looking to improve front line diagnostic services establishing remote laboratories at key BCPs and investing in deployment of rapid testing. This includes rolling out necessary training requirements along with systems to maintain and assess competency. We are also looking at wider opportunities for carrying out first level diagnostics at BCP's (e.g. lateral flow devices, microscopes and virtual-diagnostics).

Finally, there were requests for more data. The Welsh Plant Health Evidence and Advisory Group asked that the method of determining frequencies is published to ensure no inadvertent drop in biosecurity and Woodland Trust requested that information on interceptions be made public.

- The details of the methods used to establish these frequencies will be published and will be included in the relevant legislation. Future amendments to the frequencies because of this system will be discussed with the Plant Health Advisory Forum.
- Information on interceptions is published online and can be found here[6].
- It is not possible to estimate the probability of detecting pests in consignments. This is because the following variables would influence the answer:
    - Whether the pest can be detected with 100% reliability each time an item is inspected and whether that might vary at different times of the year / different growth stages
    - How many items are in each consignment
    - How many consignments are imported a year
- The proposed system is based on biosecurity risk. Frequencies of checks have been increased for higher risk commodities such as plants for planting from the EU and only decreased for lower risk commodities such as fruit.
- Future changes to the inspection regime will be based on the results on inspections which will give a greater focus on the highest risk commodities.

Next steps

The responses received were generally supportive of a GB focused risk-based frequency of checks regime. The UK Plant Health Risk Group intends to implement this new risk-based system of checks from 1 July 2022. The intended categories and frequencies are provided in the Annex to this response.

I would like to thank those responding for taking the time to submit views on the consultation. Your comments have been very valuable in working to develop a policy position.

Yours sincerely

[6] https://planthealthportal.defra.gov.uk/imports/non-compliance

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Annex 1: Frequencies of Checks for Introduction on 1 July 2022 for goods specified in Part A of Annex 11 of the retained Phytosanitary Conditions Regulation (EU) 2019/2072.

High-level Category	**Sub Category**	**Frequency of ID and physical checks from EU and RoW**
Machinery and vehicles	Machinery and vehicles which have been operated for agricultural or forestry purposes	5%
Soil and Growing Medium	Soil and Growing Medium	Inspected at the frequency of the plant(s) it is associated with
Grain (other than seed for sowing) of the genera *Triticum*, Secale and *x Triticosecale*	Grain (other than seed for sowing) of the genera *Triticum*, Secale and *x Triticosecale* from countries with Karnal bunt (Afghanistan, India,Iran, Iraq, Mexico,Nepal, Pakistan,South Africa and the USA)	100%
Plants for planting, other than seed	Dormant bulbs, corms, rhizomes, tubers, onion, garlic, shallots, not in substrate intended for planting (other than tubers of potatoes) not for final users* or commercial flower production only	100%
	Dormant bulbs, corms, rhizomes, tubers, onion, garlic, shallots, not in substrate intended for planting (other than tubers of potatoes) for final users* or commercial flower production only	10%
	Cuttings	100%
	Non-woody plants (other than seed) for final users*. Excludes shrubs, trees, other woody nursery plants, forest reproductive material	30%
	Shrubs, trees (other than cut Christmas trees), other woody nursery plants including forest reproductive material (other than seed); plants not specified elsewhere in this table	100%
	Indoor plants (including plants for use in aquaria) for final users* Indoor Plants: "clearly packed and ready for supply to final users, identifiable as being for indoor use or use in aquaria"	5%
Fruits, vegetables (other than leafy vegetables)	Not specified elsewhere in this table (EU)	3%
	Not specified elsewhere in this table (non-EU)	5%
	Momordica L. and Solanaceae Juss. (excluding Solanum tuberosum) (all other non-EU third countries)	50%
	Solanum melongena (Turkey)	30%

High-level Category	**Sub Category**	**Frequency of ID and physical checks from EU and RoW**
Leaves of plants, such as herbs, spices and leafy vegetables	Not specified elsewhere in this table (EU)	3%
	Not specified elsewhere in this table (non-EU)	5%
	Ocimum (non-EU)	50%
Cut Flowers	Not specified elsewhere in this table (EU)	3%
	Not specified elsewhere in this table (non-EU)	5%
	Eryngium (non-EU), Solidago (non-EU), Lisianthus (all third countries)	10%
	Chrysanthemum L. and *Dendranthema* (DC.) Des Moul. (Colombia and Ecuador)	50%
	Rosa (Canada, USA, Mexico and India)	50%
	Rosa (Colombia, Ecuador)	3%
Branches with foliage, parts of conifers other than bark	EU	3%
	Non-EU	5%
Tubers of Solanum tuberosum	Egypt, Poland, Portugal, Romania	50%
	Spain	100%
	All other third countries	3%
	Seed potatoes - Solanum tuberosum	100%
Seeds	Not specified elsewhere in this table	5%
	For trials or testing	10%
	Brassicaceae, Poaceae and Trifolium spp. (Argentina, Australia, Bolivia, Brazil, Chile, New Zealand, Uruguay)	100%
	Capsicum sp., Solanum lycopersicum, Solanum tuberosum (ture seed)	100%
	Triticum, Secale and Triticosecale (Afghanistan, India,Iran, Iraq, Mexico,Nepal, Pakistan,South Africa and the USA)	100%
Cut Christmas Trees (less than 3m height)	EU	3%
	Non-EU	5%
Bark	Bark	100%
Wood (and cut Christmas trees of greater than 3m height)	Wood	100%

*** intended for final users: means intended, by evidence from the packaging, labelling or by other means, for direct sale to final users**