

Plant Health Exports Audited Trader Scheme FAQ

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Eligibility and Registration

If there are multiple sites across E&W for one company, will they require individual PHEATS applications?

Yes, the Biosecurity Control Management Plan (BCMP) is specific to each individual site and therefore each site will require an individual application.

Why doesn't the scheme cover plants for planting?

Plants for planting presents a higher risk than produce for the potential movement of pests as any pest will arrive with host and does not necessarily need to transfer to a suitable host, making introduction (this is entry and establishment) more likely.

The European and Mediterranean Plant Protection Organisation for example, cited in a report on the risk of imports of plants for planting that they, and in particular ornamentals, are regularly described as hosts for a large number of introduced pests. The trade of ornamentals is often identified as a major contributor to introductions, with characteristics such as huge volumes, rapid changes in the plant species traded and their origins, rapid transport allowing survival of pests and hitch-hikers, together with the occurrence of suitable habitats at destination.

The Plant Health Exports Audited Trader Scheme (PHEATS) allows for the delegation of the inspection action for produce and cut flowers as these present a lower risk, however even at this level of risk there is still considerable requirements expected to be met through the BCMP.

How long will it take to become registered?

This will be dependent on whether application eligibility requirements are met or if further information is required. It is generally expected that successful applicants may take 3-6 weeks to complete the approval process from the submission of the initial application.

Is there a template for a BCMP?

The requirements for the BCMP are stated in Annex I of the External User Guide. The items stated in parts A-B must be provided electronically to the PHEATS mailbox. Items stated in part C must be demonstrated at the initial site inspection.

Is the scheme open to all of the UK?

At present the scheme is only available for exports of fresh produce and cut flowers from England and Wales.

Training

What if the Authorised Person(s) or the Person Responsible (PR) doesn't pass the training/assessment?

The training is designed to slowly build up your expertise in plant health by starting with fundamental plant health principles and then focusing on the more technical aspects of phytosanitary requirements. Each module will have a knowledge test to ensure that the information presented has been understood by the individual. A knowledge test can be taken multiple times, but each test will be recorded on the system. This will help inspectors identify any areas where there may need to be some reinforcement in a particular subject area.

You may access the training multiple times, however, if an individual is unsuccessful you can opt to remove them as an authorised or responsible persons.

Can a PR give training to other PRs?

Only the PR and Authorised Persons who have passed the APHA training modules and initial site inspection assessments are authorised to act under PHEATS.

New Authorised Persons must complete the APHA training in full to be authorised; internal training by the PR or Authorised Persons will not count as official training which will allow an individual to undertake inspections as part of PHEATS.

How long will the online training take?

There are several modules to read in the online training, covering international obligations, export procedures and pests and diseases. The PR and all Authorised Persons must read each module and complete each knowledge test. It is anticipated this would take 2-4 hours to complete.

What if questions are answered incorrectly on the online knowledge test?

The correct answer to each question will be confirmed as the applicant progresses through the knowledge test. The responses will be reviewed and further training provided in relevant areas at the initial site inspection.

Initial Site Inspection

How long will the initial site inspection take?

The time on site will vary depending on whether action needs to be taken to bring the site in line with the BCMP. This may also require repeat visits. At this visit, inspection training will also be provided and repeat visits may be required if the PR or all Authorised Persons are not able to be present. It is anticipated the initial site inspection would take 2 hours to complete.

Export Process

How do I obtain a phytosanitary certificate for export to the EU?

You should contact your local plant health inspector to determine the plant health requirements for the goods that you are exporting. For regulated plants and plant products, you will need to have registered via the current IT system eDomero.

How do I register for eDomero?

Information can be found on the [GOV.UK](https://www.gov.uk) on how to register for eDomero.

What documentation will be required for export applications?

Any documents that help an inspector to identify a consignment will be required, such as the commercial invoices containing commodity codes, and packing lists. Where applicable there may be the requirement to provide documents such as fumigation certificates as evidence to show consignments have been treated appropriately. Furthermore, although not applicable to EU trade, exporters may have to provide import permits that detail the requirements of the importing country.

How do I make an export application?

There is some information available within the User Guide. Further to this information related as to how to make an export application on eDomero can be found on the [plant health portal](#).

Can you upload a CSV file as part of your application?

No, this functionality does not currently exist for exports on eDomero. You can however, upload a packing list or spreadsheet of the goods you intend to export and this can be certified as an official document.

How will exports of goods that are not of GB origin be certified?

De-regulated produce imported in to GB does not need to be accompanied by a phytosanitary certificate (PC). However, if such goods are then re-exported back to the EU or NI (and they are regulated in the EU), a GB PC will be required to accompany the consignment.

In order for the GB plant health services to issue the PC:

- if the goods originate from a non-EU country and there are special import requirements which can only be attested to by the plant health service in the country of origin, the GB plant health service will require a PC from the non-EU country of origin confirming the EU special import requirements have been met. e.g. citrus from South Africa
- In all other cases, e.g. if there are no such special import requirements or the goods originate from the EU, then the GB plant health service will not require a PC from the country of origin.

If the client has sourced commodities via a third party, how can they proceed with an export if they do not have access to the original PC or PEACH application number?

It is the exporter's responsibility to provide the relevant documentation to demonstrate how the consignment meets the requirements of the importing country. If the exporter cannot obtain this information, the export will not be able to proceed.

Are goods originating from Great Britain (GB) subject to a lower inspection rate?

The inspection rate is the same regardless of the origin of the commodity. However, you can inspect more than the specified rate. All commodities will need to be free from Union Quarantine Pests (UQP).

Can applications be entered in advance of the inspection?

Applications may only be entered on to eDomero after the inspection has taken place by the PR or an Authorised Person.

A completed application for PHEATS, submitted on eDomero is confirmation by the authorised person(s) that the commodities that have passed the inspection and so cannot be entered in advance.

How should the PR or Authorised Person(s) record the inspections?

The details required to be recorded are stated in Annex I of the External User Guide.

This can be in any format suited to the business, for example Excel. If notebooks are used these must be retained once completed. You can record more information than is stipulated in Annex I of the External User Guide.

All records of inspection should be made available upon request to an inspector.

Is a single phytosanitary certificate required for each commodity I want to export?

No, a single phytosanitary certificate can be issued for multiple product lines and indeed multiple commodities in a single consignment, provided the goods meet the import requirements of the destination country.

Will every export have to have copies of all import PCs from the original imports?

Yes, if your goods are not of GB origin and are subject to special requirements. You will also need to make sure that the original PCs contain any of the additional declarations (AD) (special requirements) needed for certain commodities. This additional information will need to be included on the PC and must confirm that the goods meet the EU's import requirements.

Phytosanitary Certificates (PC)

Can traders issue their own phytosanitary certificates?

No, traders cannot issue their own phytosanitary certificates. Phytosanitary certificates can only be issued by the country's National Plant Protection Organisation (NPPO). For England & Wales this is APHA, as an Executive Agency of Defra.

Who can apply for phytosanitary certificates under the scheme?

Any traders authorised under the PHEATS scheme may apply for phytosanitary certificates. If you are not authorised to export under the PHEATS scheme you will be able to export under the normal export procedures. Further information on this can be found on gov.uk.

How will phytosanitary certificates be issued?

Phytosanitary certificates issued under the PHEATS scheme will be issued centrally by the Centre for International Trade (CIT). An electronic, scanned copy of the phytosanitary certificate will be emailed to you. This electronic copy of the PC can then be provided to the importer in the EU or Northern Ireland to be uploaded as part of their pre-notification.

The original phytosanitary certificate will then be mailed out to you within 24 hours. This will need to be provided to the NPPO as soon as technically feasible thereafter.

This process is currently in place due to the current COVID 19 easement and is legislated for by the EU. Should the requirements change you will be notified prior to this happening.

Are there any fruits, vegetables or cut flowers that can't be exported?

Only fruits of *Momordica L.* originating from third countries or areas of third countries where *Thrips palmi* Karny is known to occur and where effective mitigation measures for that pest are lacking. This will be checked by CIT before exporting to ensure that your consignment complies.

Are there any fruit or vegetables that don't require a PC for export to the EU?

Some fruits do not require a PC (pineapple, coconut, durian, bananas and dates) are already exempt from the specific phytosanitary controls outlined for most imports. These consignments will continue to not be subject to any border requirements.

Where can I find out further information related to pests and diseases?

There are several sources highlighted during the training that can be used, but can include, the Plant Health Risk Register, Plant Health Portal, or the EPPO database.

Can you download a PC from eDomero?

No, only officials of the competent authority can issue a PC. eDomero produces the PC from the data the applicant submits

Are ware potatoes allowed to be exported under the PHEATS scheme?

Ware potatoes are not currently covered by the PHEATS scheme, this includes ware potatoes for exports to the final retailer. Should you wish to export ware potatoes please follow the guidance for exports that can be found on gov.uk.

Audits

Why is the audit process based on a timescale e.g. monthly rather than the number of consignments being exported?

The Authorised Person(s) are authorised to carry out the official phytosanitary inspection function; whether that is for one consignment or many. Audits may come in the form of announced or unannounced and authorised person will be expected to demonstrate that they are still competent in conducting a plant health inspection.

How long will the audit take?

The time on site will vary depending on whether non-conformities are identified, and what action is required. A demonstration of an export inspection must also be provided by the PR or Authorised Person(s) at the audit and a short assessment completed. It is anticipated an audit would take 1 hour to complete.

Fees

If a Head Office wants to submit the export application, but the inspection is carried out at a depot, which site will be invoiced?

The applicant will submit their application using their eDomero account, stating the site address of the inspection using the Post Code search function, this must be an approved site as stated in the biosecurity control management plant. There is a procedure for invoices to be sent to a different address than that of the applicant clients, if required. Please contact CIT for further information if required.

I export seasonally, will I still be charged for audits even though I'm not exporting?

Under PHEATS you can pause your participation in the scheme, if you no longer intend to export. This may be due to seasonal trades. You must provide a written declaration to APHA to state that you are pausing your participation. You may then apply for the re-approval process should you wish to export under the scheme again. You will still be required to meet all the obligations under the scheme.

You can still continue to export, should you have any ad hoc exports by submitting applications for inspections by PHSI. Any plant health service provided will be subject to the relevant inspections, fees and service level agreements

Will there be any fees for movements to Northern Ireland?

Under PHEATS for movements to NI, there will be no fees. This is due to the Movement Assistance Scheme. Fees associated with PHEATS, excluding the issuance of the PC fee, were introduced as part of MAS from the 01 July 2021, this includes the initial registration fee and the fee associated with ongoing audits.

What if I moved goods under PHEATS before the 01 July 2021 to Northern Ireland, are my fees defrayed?

Only the fees associated with the issuance of the PC were defrayed from 01 Jan 2021. All other fees associated with PHEATS will be invoiced at the appropriate rate.

I move goods to both the EU and NI under PHEATS, which fees are defrayed?

Where goods are exported to a country other than NI under PHEATS, the fee associated with initial registration and ongoing audits will no longer be defrayed. Only the fee associated the issuance of the PC to NI will be defrayed.

Will there be any fees for exports to the EU?

Yes. Plant Health services operate on a basis of full cost recovery. Fees will be charged as they currently are for exports to third countries.

Non-conformity

If a company operates from multiple sites under PHEATS, if a critical non-conformity is identified at one site, will action be taken at all the sites?

All the sites authorised under PHEATS will be operating in accordance with their own BCMP, with associated RP and Authorised Persons carrying out inspections there. Audits are carried out on this basis, and so any non-conformity identified at a site will be subject to action at this site only.

If during investigation into a non-conformity another site is implicated, for example a trace-back for a pest identifies another site, action will be taken in accordance with usual Plant Health procedures, but such action may be taken into consideration at the audit of that site as well.

Appeals

Is there a charge to appeal a decision?

There is no fee associated with submitting or the consideration of an appeal.

How do I appeal a decision?

Further information related to appeals can be found within the External User Guide.

Miscellaneous

Have other countries got similar schemes?

Yes, the IPPC allows the delegation of certain phytosanitary actions, and this option has been implemented for a number of trades moving around the world, for example the movement of seed to New Zealand from the UK, and the movement of timber from Canada to the EU. Similar schemes are also in operation in the EU.

If the scheme is successful for produce and cut flowers, are there plans to roll PHEATS out to other export sectors?

At this time the focus is on produce and cut flowers and there are not currently any plans to roll this out to other export areas.

What if the PR leaves the company?

An Authorised Person may take on the role of the PR but must sign a new application form to agree to the Terms and Conditions of the scheme.

A person not previously associated with the scheme may also take on the role of the PR if they successfully complete all the necessary training and assessments provided by APHA, in addition to signing the Terms and Conditions.

Can a client opt for a blended approach of using PHEATS for some produce exports and PHSI for others?

Acceptance on to the scheme does not preclude the option of submitting applications for inspections by PHSI. Any plant health service provided will be subject to the relevant inspections, fees and service level agreements.

Full records must be kept of inspections carried out under PHEATS.

I am currently an Authorised Trader operating under the Authorised Trader Scheme for movements to NI, will I need to use PHEATS?

When the Authorised Trader Scheme comes to an end, all exports of regulated plants and plant products will require a PC. If you export fruit, vegetables or cut flowers then you may be eligible for PHEATS. It would be advisable to have PHEATS in place before the end of the Authorised Trader.

Does my Wood Packaging Material (WPM) need to be ISPM 15 compliant?

All wood packaging material (WPM) moving between GB and the EU and being exported to Northern Ireland must be treated and appropriately marked in compliance with international standards (ISPM 15). As long as the marks are legible, pallets are compliant and can be used multiple times. Contact your supplier or TIMCON if you need more advice.

When will the UK move to using ePhyto?

The UK is aiming to introduce the capability to exchange ePhytos during 2021. Discussions between Defra and the IPPC ePhyto Solutions IT team are ongoing.

Once connected to the ePhyto solution Defra will begin bilateral negotiations with the National Plant Protection Organisation of trading partners who are using the ePhyto solution to seek agreement for the exchange of ePhytos with the UK. Until agreement has been reached paper PCs will continue to be required for exports and imports.

For those countries not using the ePhyto solution paper PCs will continue to be required for exports and imports

Will the scheme be audited by other countries?

Possibly, the importing country may choose to undertake an audit of our phytosanitary system, which may involve audits of registered sites as well as the authorised and responsible persons.