Consultation on Method for Determining the Frequency of Risk Targeted Plant Health Import Inspections

1. The inspections carried out by GB Plant Health Services on consignments of imported plants, plant products and other objects are intended to prevent the introduction and spread of organisms harmful to plants or plant products and 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 threat of pests and diseases and help support the government's goal of leaving the natural environment in a better state than we found it.

2. 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. Certain criteria, including an adequate level of consignments imported and inspections carried out, had to be met for trades to be considered for any reduction in inspection frequency. The level of checks required was calculated using a matrix, based on the number of imported consignments, the level of inspections carried out and the history of past compliance. Following our exit from the EU we are intending to retain that risk targeted approach to import inspections and adapt it to better align with the particular risk that imported consignments pose to GB.

3. The annex below provides more background and explains the method that we are intending to use to determine the levels of identity checks and physical inspection on regulated plant health goods imported into GB. The level of checks would be reviewed annually and amended upwards or downwards as necessary to reflect any changes in the level of risk particular trades pose. Any evidence of a serious plant health risk could lead to more urgent action being taken outside of the annual review process (e.g. immediately increasing inspection levels).

4. We would welcome your views on the proposal. At this point we are only seeking views on the method used to determine the level of checks and not the level of checks themselves. **We would be grateful for any comments by 4 August 2021.**

The risk targeted system for inspection of regulated plant health material entering GB

1. Purpose

This text summarises the evidence used to inform the minimum level of identity and physical phytosanitary inspections (checks) of certain plants, plant products or other objects eligible to be part of a risk targeted import inspection regime.

2. Introduction

In response to the UK's withdrawal from the EU there was a need to develop a risk targeted import inspection regime for GB. This would allow reduced levels of identity and physical checks on lower risk regulated material of plant health relevance. Most consignments of plants, plant products or other objects for import should, in principle, be subject to documentary, identity and physical checks before being permitted entry. However, whilst part of the EU and to make efficient use of inspection resources, consignments of some plant products or other objects, with a good history of compliance with phytosanitary requirements, were allowed a reduced frequency of plant health checks, provided they met certain eligibility criteria.

Following the end of the Transition Period GB Plant Health Services have developed a risk targeted inspection system to allow for lower levels of checks of regulated plant health goods. The Official Controls Regulation requires such a system to be developed. The GB risk targeted inspection system will allow inspection resources to be saved if fewer checks are made on the lowest risk material. Justification for developing a system of lower level checks is supported by the fact that there are no records of regulated pests becoming established in GB as a result of infestation on regulated imports of plant produce.

3. The GB system for risk targeted inspections

An EU system for risk targeted inspections has been in place since 2005, it works well and is recognised by third countries. It provides a model framework for how a GB system could operate. The framework for the EU risk targeted checks system has therefore been taken and adapted for use by GB. Criteria used to determine which regulated goods are eligible for a reduced level of checks in the EU are also being used in the GB system but scaled appropriately to reflect the smaller GB market. Thus, eligible goods will generally require a history of trade occurring in at least each of the past three years and have evidence of good compliance, e.g. no, or a very low level, of quarantine pests being detected. Each trade (country and commodity combination) in the risk targeted system will require at least 40 checks. Under the EU system the minimum had been 200.

The degree by which identity and physical checks are to be reduced will be informed by the number of consignments imported and checked and the number and mobility of quarantine pests found during inspections. A GB working group will monitor and review compliance annually and will alter the frequency of checks, raising or lowering the level as appropriate.

Any evidence of a serious plant health risk could lead to more urgent action being taken outside of the annual review process (e.g. immediately increasing inspection levels).

This mirrors the work of the EU inspection frequency working group. Trades will be eligible to be added to the system if supported by evidence or good justification. Trades already in the system that fail to maintain the required eligibility criteria set out in paragraph 4.1 below will be removed from the GB risk targeted inspection system with target levels of inspection reverting to 100%. A minimum number of 40 checks per year on each trade is suggested as the lowest level of checks permitted to allow continued monitoring of risk.

4. Outline method of evaluation

4.1 <u>Eligibility</u>

Trades eligible for consideration as part of a GB risk targeted plant health checks regime should meet the following criteria:

(a) the mean number of consignments of the product imported into GB over the past three years should be at least 54 consignments per year, and

(b) the mean number of consignments of the product imported and physically inspected in GB over the past three years should be at least 40 per year,

4.2 <u>Procedure</u>

The level of checks required is determined by:

- the number of consignments inspected over the previous three years,

- the number of quarantine pests intercepted over the previous three years,

- the mobility of the relevant quarantine pests at the pests most mobile stage,

- other relevant factors. For example, documentary infringements, such as missing additional declarations, or lack of ISPM 15 markings on certain wood products.

i) For each trade (commodity & country combination) being considered, determine the number of consignments physically inspected in GB over past 3 years. Locate this value in column A of Table 1 (Look up table).

ii) Classify the mobility of each pest intercepted on the trade and notified to Europhyt / GB equivalent to Europhyt, in the past 3 years. Rate mobility as either High, Medium or Low. Mobility ratings are scored. High = 9, Medium = 3 and Low = 1. Score 0.1 for any and each additional notification of non-compliance. Sum the non-compliance and weighted mobility scores to give the F score for the trade using Table 2.

iii) In Table 1, cross reference the F score (Column C) with the number of consignments checked in GB over the past 3 years (Column A) and read across into Column D which indicates the possible % of checks required.

iv) If the % checks required indicates that less than 40 consignments can be inspected the level of inspection is adjusted up to a level that ensures that at least 40 consignments are inspected the following year (Column E).

Table 1: Look up table to determine level of checks based on number of consignments previously checked and F score.

A. Number of consignments checked in GB over past 3 years		B. Mean number of annual checks in GB		C. F score	D. % checks required	E. Number of expected consignments checked in a year	
From	To	From	To			From	To
120	299	40	99	> 36	100	40	99
				$> 27, \leq 36$	75	40	75
				$> 18, \leq 27$	50	40	50
				$> 11, \leq 18$	25	40	40
				$> 7, \leq 11$	10	40	40
				≤ 7	5	40	40
300	599	100	199	> 45	100	100	199
				$> 36, \leq 45$	75	75	150
				$> 27, \leq 36$	50	50	100
				$> 18, \leq 27$	25	40	50
				$> 11, \leq 18$	10	40	40
				≤ 11	5	40	40
600	1,199	200	399	> 56	100	200	399
				$> 45, \leq 56$	75	150	300
				$> 34, \leq 45$	50	100	200
				$> 25, \leq 34$	25	50	100
				$> 16, \leq 25$	10	40	40
				≤ 16	5	40	40
				≤ 5	1	40	40
1,200	2,399	400	799	> 63	100	400	799
				$> 54, \leq 63$	75	300	600
				$> 36, \leq 54$	50	200	400
				$> 27, \leq 36$	25	100	200
				$> 18, \leq 27$	10	40	80
				≤ 18	5	40	40
				≤ 7	1	40	40
2,400	4,799	800	1,599	> 83	100	800	1,599
				$> 63, \leq 83$	75	600	1,200
				$> 52, \leq 63$	50	400	800
				$> 38, \leq 52$	25	200	400
				$> 25, \leq 38$	10	80	160
				≤ 25	5	40	80
				≤ 7	1	40	40
>4,800		1,600		> 144	100	1,600+	
				$> 117, \leq 144$	75	1,200	9,000
				$> 90, \leq 117$	50	800	6,000
				$> 63, \leq 90$	25	400	3,000
				$> 36 \leq 63$	10	160	1,200
				$> 7, \leq 36$	5	40	600
				≤ 7	1	40	120

Table 2: Determining the F score. Multiply each interception over the past three years by the pests' mobility rating then sum across all interceptions and other non-compliance to get F

Mobility rating =	High	Medium	Low	Other non-complianceᵃ
No. of infringements of each type in past 3 years	a	b	c	d
Weighting	9	3	1	0.1
Product of # infringements by weighting	9a	3b	c	0.1 d
F =	9a + 3b + c + 0.1d			

[a] Other non-compliance e.g. wood with bark that should be bark free; documentary infringements