

Environment, Food and Rural Affairs Committee

UK-EU trade: towards a resilient border strategy

Fourth Report of Session 2024–25

HC 1297

Environment, Food and Rural Affairs Committee

The Environment, Food and Rural Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Environment, Food and Rural Affairs and its associated public bodies.

Current membership

[Mr Alistair Carmichael](#) (Liberal Democrat; Orkney and Shetland) (Chair)

[Sarah Bool](#) (Conservative; South Northamptonshire)

[Charlie Dewhurst](#) (Conservative; Bridlington and The Wolds)

[Helena Dollimore](#) (Labour; Hastings and Rye)

[Sarah Dyke](#) (Liberal Democrat; Glastonbury and Somerton)

[Jayne Kirkham](#) (Labour; Truro and Falmouth)

[Josh Newbury](#) (Labour; Cannock Chase)

[Andrew Pakes](#) (Labour; Peterborough)

[Jenny Riddell-Carpenter](#) (Labour; Suffolk Coastal)

[Tim Roca](#) (Labour; Macclesfield)

[Henry Tufnell](#) (Labour; Mid and South Pembrokeshire)

Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No. 152. These are available on the internet via www.parliament.uk.

Publication

This Report, together with formal minutes relating to the report, was Ordered by the House of Commons, on 2 September 2025, to be printed. It was published on 15 September 2025 by authority of the House of Commons. © Parliamentary Copyright House of Commons 2025.

This publication may be reproduced under the terms of the Open Parliament Licence, which is published at www.parliament.uk/copyright.

Committee reports are published on the Committee's website at www.parliament.uk/efracom and in print by Order of the House.

Contacts

All correspondence should be addressed to the Clerk of the Environment, Food and Rural Affairs Committee, House of Commons, London SW1A 0AA. The telephone number for general enquiries is 020 7219 1119; Press enquiries: 020 7219 3138; the Committee's email address is efracom@parliament.uk. You can follow the Committee on X (formerly Twitter) using [@CommonsEFRA](https://twitter.com/CommonsEFRA).

Contents

Summary	1
Our inquiry	3
1 Risk, compliance and data	4
Approach to risk	4
Use of auto clearance	5
Compliance	6
Data	6
Sevington inland border control post (BCP)	8
2 Digital Systems	11
Data sharing with delivery partners	14
3 Cost, delays and administrative burden	16
Single Trade Window	16
Common User Charge (CUC)	17
Plant inspections	18
Control Points	19
4 Planning and delivery of future commercial biosecurity arrangements	21
Consultation and communication	21
Continuous improvement and compensation	22
User experience	23
Conclusions and Recommendations	25
Formal minutes	32
Witnesses	34

Published written evidence	35
List of Reports from the Committee during the current Parliament	41

Summary

Following the UK's departure from the European Union, successive governments have taken steps to design and implement a new framework to safeguard the biosecurity of British borders while also ensuring the continued flow of animal and plant products. In 2020, the then Government set out its vision to deliver a world-class, simplified, proportionate, and digitalised biosecure border “that protects public health, supports prosperity, and enables security for a global United Kingdom” by 2025.¹ The development process for this policy resulted in the Border Target Operating Model (BTOM), which presently serves as the operational framework for maintaining biosecurity in the UK's external trade in animal and plant products.

Our analysis has exposed the inadequacy of arrangements under the BTOM, which has fallen short of expectations due to inconsistent enforcement, flawed digital systems, inadequate consultation and limited support for local authorities. This failure has presented, and continues to present, real threats to the biosecurity of British animals and plants and the viability of our agricultural and horticultural sectors. The Committee's first report of its inquiry into Animal and plant health provides further information about the range of animal health threats that the UK faces.²

The shortcomings in the UK's biosecurity systems were exposed following the introduction of an import ban on German food products following outbreaks of foot and mouth disease in Europe in early 2025. Our Committee found that imports within the scope of disease control measures were being automatically cleared through the UK border for six days until digital systems were updated. As such, it is only by good fortune that the UK was saved from a potentially devastating outbreak of foot and mouth disease.

Positively, on 19 May 2025, the UK Government and EU Commission agreed a Common Understanding to work towards establishing a common sanitary and phytosanitary (SPS) area. However, until an agreement is reached, and in circumstances in which an agreement is not reached or is withdrawn

1 HM Government, [2025 UK Border Strategy](#), December 2020

2 Environment, food and rural affairs committee, Third Report of session 2024–25, ‘Biosecurity at the border: Britain's illegal meat crisis’, HC 1296

from by either party, the UK will continue to rely on a flawed BTOM for its biosecurity controls. As such, it is essential that present arrangements are reviewed and bolstered.

Our Report identifies areas of concern and recommends ways to address them. We support the calls we heard for “practical short-term solutions” for industry to improve biosecurity measures, and concur with our witnesses that while any common SPS area would reduce the frequency of border checks in certain sectors, it is unlikely to eliminate them entirely.³ The extent of future checks remains uncertain, particularly as Great Britain, pursuant to the agreement, will remain part of the external border of the EU single market for food and drink.

Our scrutiny has found that while assessments of the BTOM design vary, its effectiveness is ultimately undermined by poor delivery and oversight. Without reliable implementation, even a well-designed system cannot safeguard UK biosecurity.

There is a critical need for greater transparency and accuracy in the modelling and application of SPS controls. We recommend that Defra clarify inspection data, explain port-by-port variances, and demonstrate how BTOM risk-based inspection rates are being met.

We are not confident that Defra has effective oversight of border controls, particularly at the Short Straits, where enforcement is weakened by flawed IT systems, data gaps and limited support for inland authorities. Digital systems must be interoperable with EU and UK inland systems: urgent decisions need to be made on long-term system alignment.

Industry stakeholders remain dissatisfied with the current enforcement regime, citing concerns over value for money, inspection standards, and biosecurity. Rebuilding trust with importers and businesses will require improved transparency, consistent enforcement, and clearly communicated responsibilities.

The UK-EU SPS negotiations provide an opportunity for the Government to reset its relationship with the EU, but also to rebuild trust with domestic stakeholders—importers, local authorities, and enforcement bodies—who have borne the brunt of uncertainty, additional and unexpected costs, and operational disruption. Delivering a border system that is truly effective, efficient and equitable will require sustained investment, meaningful engagement and a commitment to learning from the lessons of the past.

3 Fresh Produce Consortium, ‘FPC secures critical win for members: SPS controls on EU fruit & veg delayed until January 2027’, 6 June 2025

Our inquiry

Upon the formation of the Committee, we met to agree priority areas of work for the coming Parliament, and in January 2025 published a strategy detailing both our approach to scrutiny and our priority areas to that end.⁴ Through this process, we identified animal and plant health—and, within that, biosecurity at the border—as an area in need of particular scrutiny. We subsequently launched a long term, thematic and iterative inquiry into ‘Animal and plant health’ on 9 January 2025.⁵ Within this broader inquiry, we identified the need for timely scrutiny of border biosecurity policy and as such launched a workstream and specific call for evidence on ‘Biosecurity at the border’ which resulted in the submission of 169 pieces of written evidence. We have since held three oral evidence sessions and visited border facilities at Dover and Sevington to assess the efficacy of measures at the Short Straits. We have also visited the APHA’s headquarters in Weybridge and the Friedrich-Loeffler-Institut - Germany’s federal research institute for animal health - to deepen our understanding of animal disease risks, potential responses to animal disease outbreaks and the UK’s biosecurity capability.

In our work to date we have drawn a distinction between commercial trade and the personal import of animal and plant products. This distinction is important because the methods and responsibilities for enforcing controls on personal and commercial imports of products of animal origin and plants differ significantly. We have consistently found that the risks associated with commercial imports—such as threats to supply chains, market competition, and commercial interests—are fundamentally different from those posed by personal imports, which present high risk, unregulated pathways for the introduction of diseases into the UK. To prevent the conflation of these two distinct policy areas, the Committee has chosen to produce separate reports addressing each, as the first two reports in our long-term inquiry into animal and plant health. This, the second of those reports, focuses on commercial imports and considers the BTOM and UK biosecurity. We published the first report of this inquiry, on the risks associated with the personal import of meat products on 8 September.

In July, we launched a new workstream and call for evidence into the priorities for a UK-EU SPS agreement as part of our over-arching inquiry. In this we intend to take the lessons of this Report and apply them to the emerging developments in the UK-EU relationship. This, we hope, will provide constructive and collaborative scrutiny of the Government’s negotiation and implementation of a new border regime.

4 Environment, food and rural affairs committee, [Committee strategy 2024–25](#)

5 Environment, food and rural affairs committee, [Animal and plant health](#), accessed 26 August 2025

1 Risk, compliance and data

Approach to risk

1. Under the BTOM, border checks should be conducted on a risk-basis at inspection rates set out by Defra, which are based on the risk-categorisation of goods by country and commodity.⁶ The National Farmers' Union (NFU) has raised several concerns about this categorisation process. For example, it notes a disparity in inspection rates for imports and exports, highlighting that medium-risk products of animal origin (POAO) imported from the EU are subject to only a 1% physical inspection rate at the GB border, compared to a 15–30% inspection rate for equivalent GB exports to the EU. It is also concerned by a lack of transparency in how inspection rates are determined and the lack of published risk assessments underpinning these decisions.⁷ Dover Port Health Authority has also reported that Defra's modelling of POAO volumes was based on flawed assumptions and did not rely on established data for traffic through the Short Straits, which has led to a significant underestimation of the volume of SPS checks required.⁸
2. There have been conflicting assessments of whether the BTOM and its phased implementation has improved biosecurity at the GB border. A 2024 NAO report found that “the UK has faced increased biosecurity risk as a result of the phased approach to introducing full import controls.”⁹ It reported that while there had not been a disease outbreak as a result of the phased implementation approach to the BTOM, the lack of requirement for Export Health Certificates before January 2024 would have made tracing any outbreaks challenging.¹⁰ In contrast, however, the Food Standards Agency's “overall qualitative assessment is that the implementation of the BTOM has contributed positively to our ability to manage risks posed to food and feed safety from commercial imports from the EU [...]”¹¹

6 UK Government, [The Border Target Operating Model](#), p37, 29 August 2023

7 National Farmers' Union (NFU) ([APH0152](#))

8 Letter from Lucy Manzano, Head of Public Protection and Port Health, Dover Port Health Authority, regarding the Committee's visit to the Short Straits border, [21 March 2025](#)

9 National Audit Office, [The UK border: Implementing an effective trade border](#), 20 May 2024 para 8

10 As above

11 Food Standards Agency, Board Papers, [Border Target Operating Model – One Year On](#), last update 12 March 2025

3. Evidence to the Committee suggests that varying levels of controls and checks are occurring across ports of entry due to capacity challenges, rather than risk levels.¹² The SPS Certification Working Group provided the example of the Port of Felixstowe, where Official Veterinarian (OV) occupancy is only 44% (seven OVs in place, nine vacancies), Port Health Officer occupancy is 79% (three vacancies) and Authorised Officer occupancy is 74% (eight to nine vacancies).¹³

Use of auto clearance

4. Evidence to our inquiry has highlighted serious concerns that, due to capacity issues at border control posts (BCPs), the timed-out decision contingency feature (TODCOF)¹⁴ or other auto clearance mechanisms are routinely being used, despite the risk-based inspection rates stipulated by the BTOM.¹⁵ The reasons for their use are often unclear leading to “unpredictability and confusion”.¹⁶ Helen Buckingham, a chartered environmental health practitioner with over 30 years’ experience and former Executive Director of food and port health services in local government, told us that, “even though we have carefully constructed percentages that have been risk-rated and applied to certain commodities [...] the percentages have been applied but TODCOF comes along and wipes it off so everything skates through anyway.”¹⁷
5. The Minister for Biosecurity, Baroness Hayman, told the Committee that the TODCOF “is a contingency measure that the public would expect a government digital service to have” and that it, “can be configured to ensure that goods of greatest risk and concern are not auto cleared.”¹⁸ However, Helen Buckingham suggested that rather than a “contingency measure” the auto-clear mechanism has largely been a “default status”.¹⁹ In addition, as we note in Chapter 2, following the recent foot and mouth

12 [Qq222–224; Q231](#)

13 SPS Certification Working Group ([APH0165](#))

14 The Timed-Out Decision Contingency Feature (TODCOF) is a contingency mechanism that permits the entry of medium-risk animal products from the EU into the UK without documentary checks or physical inspection under exceptional circumstances. TODCOF can be triggered when Border Control Posts (BCPs) reach their inspection capacity, allowing low and medium-risk consignments from the EU, and low-risk consignments from non-EU countries, to be cleared without standard border checks.

15 [Q65](#)

16 [Q224](#)

17 [Q65](#)

18 Letter from the Minister for Biosecurity regarding biosecurity at the border, [dated 24 February 2025](#)

19 [Q65](#)

disease outbreak in Germany, products within the scope of disease control measures were able to auto clear through the TODCOF for a period of six days despite the ban.²⁰

Compliance

6. Industry stakeholders reassured the Committee that compliance with BTOM requirements is high but stated that it has come at considerable cost and presented significant logistical challenges to many businesses.²¹ We have also heard that varying inspection rates at different ports has created a system that can be gamed by those seeking to dodge costs or import illegal goods. This jeopardises the level of biosecurity the framework was designed to ensure. Helen Buckingham warned us about the “unintentional non-compliant situation that could be exacerbated into something much worse.”²²
7. The National Food Crime Unit (NFCU) and the Scottish Food Crime and Incidents Unit (SFCIU) have raised concerns that the BTOM arrangements have created an incentive for importers to purposefully mis-declare consignments “[...] so as to secure commercial or financial advantage through speedier clearance, and with a decreased probability of official controls being applied.”²³ The Committee had similarly heard that some bad-actors are gaming IT systems by mis-declaring goods as low risk shortly before or after arrival resulting in automatic clearance of border checks.²⁴ NFCU and SFCIU report that fraudulent documents and falsified labelling continue to be used to mislead authorities about the true nature of food imports, which further emphasises the need for a robust regime of border inspections.²⁵

Data

8. The Minister for Food Security and Rural Affairs has said that data relating to SPS checks at Sevington inland Border Control Post (BCP) (see section on [Sevington inland BCP](#) below), including actual check rates and the number of checks that have been conducted, are not being published to “protect the integrity” of the intelligence-led and risk-based

20 [Q9](#)

21 [Q193](#); [Q196](#)

22 [Q65](#)

23 Food Standards Agency and Food Standards Scotland, [Food Crime Strategic Assessment 2024](#), 12 September 2024 p 43

24 Grimsby & Immingham Port Health Authority (APH0124); National Pig Association (APH0097); Dover Port Health Authority (APH01556).

25 Food Standards Agency and Food Standards Scotland, [Food Crime Strategic Assessment 2024](#), 12 September 2024 p 42

approach to inspections as well as “commercial confidentialities”.²⁶ However, the Food Standards Agency has found that the availability and quality of data prevents accurate reporting of the number of checks completed and issues identified under the BTOM.²⁷ When questioned by the Committee, Baroness Hayman and officials acknowledged that the BTOM is a complex new system and that more work needs to be done on data quality.²⁸ Defra told us that its focus areas for improvement include user capability and interoperability of systems.²⁹

9. **CONCLUSION**

While assessments of the effectiveness of the Border Target Operating Model (BTOM) in safeguarding UK biosecurity vary, and regardless of whether full or partial implementation would be sufficient in principle, Defra and the relevant authorities have not fulfilled their responsibilities under the BTOM in practice. As such, the question of adequacy of the system is largely academic; without effective delivery, even a well-designed model cannot achieve its intended outcomes. We are reassured by the overall level of compliance within industry, but a robust, risk-based regime is essential to maintaining standards and safeguarding biosecurity. We have real concerns that the inspection rates set out in the BTOM risk assessment are not being met and that Defra has no effective system of oversight for border controls. We are not convinced that a lack of published data on the inspection rates is due to a desire to protect the integrity of the intelligence system. We have concerns that they are not being published to avoid highlighting Defra’s historic noncompliance with its own targets.

RECOMMENDATION

It is essential that Defra thoroughly reviews the implementation of the BTOM. Defra should commit to this review in its response to our Report, and the review must be published no later than January 2026. It should set out why and how much variation in inspection rates is occurring between ports of entry, and how often auto clearance mechanisms are being used and the reasons for this. In its response to this Report, the Government should commit to the publication of quarterly inspection rates for all ports of entry, beginning January 2026, and to publishing historic quarterly inspection rates.

26 [Horticulture: Import Controls](#), UIN 22698, 20 January 2025; Q325.

27 Food Standards Agency, Board Papers, [Border Target Operating Model – One Year On](#), last update 12 March 2025

28 [Q324](#)

29 [Q324](#)

10.

CONCLUSION

Varying inspection rates at different ports of entry has created a system that can be gamed by those seeking to dodge costs or import illegal goods and may even introduce “temptation” for legitimate importers who witness their consignments auto-clear important processes.

RECOMMENDATION

In the review proposed above, Defra should work with relevant Government departments and non-departmental delivery partners to assess the scale and nature of intentional non-compliance and outline the steps it will take to address this. These lessons should also be applied to any future UK-EU trading arrangements.

11.

CONCLUSION

There is a critical need for greater transparency and accuracy in the modelling and implementation of SPS controls. A failure to publish risk assessments and data informing inspection rates, limits scrutiny and undermines trust in the system. Addressing these issues through open publication and review of underlying models will support more effective, evidence-based policy and enforcement at the GB border. As such, we welcome the commitment the Minister for Biosecurity made on 6 May to review the type of data Defra will publish.

RECOMMENDATION

Defra should, in response to this Report, provide us with the risk-based assessment models and underlying data used to determine SPS inspection rates. Publicly available models will enhance transparency, allow for independent scrutiny, and help rebuild stakeholder confidence in the integrity of border biosecurity measures.

Sevington inland border control post (BCP)

12. We received specific and repeated concerns that the unique location of Sevington inland BCP, 22 miles away from the Port of Dover, provides opportunities for exploitation by criminals.³⁰ Specifically, stakeholders warned that conducting checks away from the point of entry weakens enforcement and increases the risk of illegal goods, including meat,

30 Quality Meat Scotland ([APH0091](#)); National Pig Association ([APH0097](#)); National Farmers' Union (NFU) ([APH0152](#)); National Farmers Union Scotland ([APH0098](#)); [Q5](#)

entering the country through commercial import routes.³¹ If a consignment is notified to present for checks at Sevington inland BCP, there is the potential for goods to be offloaded en-route or for complete non-attendance.³²

13. Ashford Port Health Authority, which is responsible for the Sevington site, makes referrals to inland local authorities when consignments do not present for checks. However, retrospective enforcement is of no use if contaminated meat or dairy has already entered the environment or food supply chain. Lucy Manzano, Head of Port Health and Public Protection at Dover Port Health Authority cautioned that, “the systems in place are resulting in tonnes of illegal meat coming through the commercial channel[...] That is the exact channel where all of us as consumers were reassured this would not happen once the BTOM was implemented, and it is happening.”³³
14. The NAO recently reported that there are, “conflicting views and a lack of clear guidance on what is required” of vehicles entering via the Short Straits.³⁴ Ashford Borough Council told the NAO that lorries should be sealed at origin by the operator and remain sealed until they reach the BCP, and that it follows up on any vehicle that does not arrive. However, Defra told the NAO that it did not consider commercial seals to increase the security of vehicles and that it was not aware of any legal requirement for vehicles to be sealed. Furthermore, goods that are re-exported from Sevington inland BCP due to non-compliance are re-exported into GB as “Ashford is not the border; the border is of course at Dover”.³⁵

15. **CONCLUSION**

Defra maintains that a “robust” enforcement system is in operation at the Short Straits entry point. Within the context of flawed IT systems, data gaps, routine auto-clearance of goods and strained local authorities, the Committee does not share that confidence. We are particularly concerned that the absence of robust enforcement mechanisms between the Short Straits and Sevington inland BCP has created vulnerabilities that may be exploited for the illegal entry of products of animal origin into Great Britain. The current system, as it stands, risks undermining the very assurances that the BTOM was intended to deliver.

31 [Q74](#); Correspondence from Dover District council to the Committee regarding biosecurity measures [dated 18 March 2024](#)

32 Dover Port Health Authority ([APH0156](#))

33 [Q74](#)

34 National Audit Office, [Resilience to animal diseases](#), 4 June 2025 p10

35 [Q74](#)

RECOMMENDATION

In an annex included in the response to this Report, Defra should provide us with the August and November 2024 figures relating to the number of lorries that were directed to Sevington Inland BCP for border checks and the number of lorries that present themselves to the BCP for inspection in that same month. This would allow the committee to scrutinise compliance levels without jeopardising the dynamic nature of intelligence-led biosecurity controls. The Government should also outline what specific process it will implement to validate that goods re-exported following inspections at Sevington Inland BCP do in fact leave the UK. This process should include mechanisms for tracking consignments post-inspection and verifying their departure from UK territory, with appropriate documentation and oversight to ensure compliance. Defra should also provide, in its response to this Report, its assessment of the potential merits of creating a legal mechanism to ensure lorries transporting animal and plant products are commercially sealed.

2 Digital Systems

16. Upon leaving the EU, the UK lost access to TRACES NT³⁶ and the then Government chose to develop a new system—the import of products, animals, food and feed system (IPAFFS)—from scratch. We have consistently heard that IPAFFS falls short of expectations, with stakeholders reporting issues with usability, reliability and data transfer.³⁷ It has been described as “the Fisher-Price version of what we used to use in the EU, which needs scrapping and starting again, because it does not do what it should.”³⁸
17. The January 2025 outbreak of FMD in Germany was a pressure test for IPAFFS.³⁹ We raised concerns with the Minister for Biosecurity about the amount of time it took for Defra to update IPAFFS to reflect the import ban announced on 10 January. Following the outbreak, we requested data on the number of prohibited shipments that were able to auto-clear the GB border following the Government’s imposition of a ban. Despite first requesting the information from the Minister on 11 February, it was not until correspondence on 6 June that we were ultimately able to ascertain that between 10–16 January goods within scope of the ban were able to autoclear border controls. Subsequently, Defra is not able to produce a reliable figure of the number of consignments affected.⁴⁰ Defra has explained that it took six days to assess and identify over 1,100 affected commodity codes, after which IPAFFS was updated within six hours. Whilst the Department has repeatedly expressed confidence that manual interventions by port health authorities adequately mitigated the risk of FMD, it recognises that reliable data would “give additional assurance”.⁴¹ The Chief Veterinary Officer told us that her learning is that a “24-7, 365 team” is needed to update IT systems as soon as she gives instructions and that the Department should be “less reliant on manual interventions

36 TRACES NT is the European Commission’s online platform for managing sanitary and phytosanitary certification and trade of animals, animal products, food, and plants within the EU and for imports and exports.

37 George Baker Shipping Ltd ([APH0148](#)); Horticultural Trades Association (HTA) ([APH0157](#)); SPS Certification Working Group ([APH0165](#))

38 [Q58](#)

39 See [Chapter One](#), and also please see [Committee reports on illegal meat](#) for more details

40 Letter from the Minister for Biosecurity regarding biosecurity at the border, [dated 6 June 2025](#)

41 Letter from the Minister for Biosecurity regarding biosecurity at the border, [dated 6 June 2025](#)

and individual actions.”⁴² In evidence on 10 January 2025, the Minister then told the Committee that the delay in relaying the figures was not in fact an issue with data acquisition but an internal departmental bureaucratic issue with correspondence between herself and this Committee.⁴³

18. Evidence to the Committee has also called for interoperability between IT systems used by various authorities and businesses. Katrina Walsh, Strategy Director at the International Meat Trade Association, told us that “there was insufficient testing of the systems and how they would work together before this was rolled out.”⁴⁴ This was despite the nine month delay in the initial implementation of pre-notification policies requiring importers to use IPAFFS.⁴⁵ The National Office for Animal Health noted that integration of IPAFFS with EU databases would improve efficiency and reduce administrative burdens and therefore would significantly enhance the system’s functionality.⁴⁶ The Common Understanding,⁴⁷ signed by the UK and EU on 19 May, states that the UK will have appropriate access to relevant EU systems and databases in the future. It remains unclear whether the Government intends to integrate IPAFFS with these systems or replace it with renewed access to TRACES NT.

19. **CONCLUSION**

Throughout our inquiry, we heard repeated and serious concerns about the functionality, integration, and reliability of the IT systems underpinning the UK’s border biosecurity regime. As enforcement relies on data, these concerns raise fundamental questions about the Government’s ability to deliver on its commitments under the BTOM. We welcome the Department’s efforts to review how data are recorded and analysed within port health authority and Defra IT systems and how these can be combined to create a reliable and complete data picture. We note that the Department is now working to pre-identify commodity codes for the top five notifiable diseases to enable faster updates in future. We are also encouraged by the improved response to subsequent FMD outbreaks in Slovakia and Hungary, where IPAFFS was updated immediately in line with policy changes, preventing goods from auto-clearing controls. This demonstrates that lessons are being learned but also underscores the need for a more resilient and responsive system from the outset.

42 [Q132](#)

43 [Qq243–246](#)

44 [Q220](#)

45 Gov.uk [Government accelerates border planning for the end of the Transition Period](#), 12 June 2020; Agricultural Industries Confederation, [IPAFFS/PEACH pre-notification required from January 2022](#), 22 December 2021

46 National Office of Animal Health ([APH0099](#))

47 Cabinet Office, [UK-EU Summit - Common Understanding](#), 19 May 2025

RECOMMENDATION

In response to this Report, the Government should confirm that it has produced a list of pre-identified commodity codes for the top five notifiable diseases and provide a copy of this database containing the commodity codes in question to the committee. The Government should also confirm that it has established a digital team that can update IPAFFS '24-7, 365', in line with the statement from the Chief Veterinary Officer.

20.**CONCLUSION**

It is disappointing that it required persistent questioning from the Committee over a period of three months before the Department provided answers to all our questions regarding the initial response to foot and mouth disease (FMD) outbreaks in Europe. This reflected cultural and bureaucratic issues within Defra that impeded effective scrutiny and timely adherence to parliamentary processes, ultimately creating barriers to public transparency. We are encouraged by the Minister's commitment to improve transparency and the handling of correspondence with the Committee.

21.**CONCLUSION**

The Common Understanding with the EU presents a positive and welcome opportunity to bolster UK biosecurity and we praise the Government for its work in this regard. It remains unclear, however, how the Government sees the new arrangements working in practice.

RECOMMENDATION

In response to this Report, the Government should set out its strategic objectives for shared EU-UK digital systems in the context of border biosecurity. Specifically, it should clarify whether IPAFFS will be retired in favour of adopting TRACES NT, or whether a model of integration is preferred. The Government should also outline contingency plans for digital system continuity in the event of a breakdown in any future SPS agreement. Defra should publish a comparative analysis of the costs and benefits of both integrating IPAFFS with TRACES NT, or adopting TRACES NT wholesale, ahead of the establishment of a Common SPS Area. Any new IT systems introduced as part of this transition must undergo rigorous testing prior to deployment and be fully interoperable with existing platforms across both UK and EU jurisdictions, including those used by local authorities.

Data sharing with delivery partners

22. Once personal and commercial imports have cleared the border, responsibility for oversight and enforcement is transferred to the local authority at the goods' destination. In cases where commercial vehicles fail to report to designated BCPs for checks, goods are referred to the inland local authority. The Committee received compelling evidence that the implementation of the BTOM has placed significant pressure on inland local authorities, placing further strain on already stretched local enforcement capacity.⁴⁸ Despite the expanded role of inland local authorities, evidence to this Committee suggests that they were overlooked during the consultation, planning and rollout of the BTOM. Helen Buckingham noted that no additional funding has been allocated to support these authorities, despite the increased workload resulting from the introduction of SPS checks on EU imports and stricter rules on personal imports.⁴⁹ This lack of resourcing has been compounded by limited access to key systems such as IPAFFS, which restricts local authorities' ability to track and manage prohibited goods effectively.⁵⁰
23. The Committee also heard that information sharing between national agencies and local authorities remains inadequate.⁵¹ Notifications of illegal imports are reportedly common, yet enforcement is hampered by fragmented data and poor system interoperability.⁵² When questioned, officials and the Minister were unable to clarify what information is currently accessible to local authorities.⁵³

24.

CONCLUSION

Until a Common SPS Area is formally established, IPAFFS will remain the UK's primary digital system for managing border biosecurity. It must therefore be capable of meeting the operational needs of all users and enforcement bodies, including importers, port health authorities, and inland local authorities. The system's interoperability with EU platforms and local authority systems is essential to ensure effective enforcement and traceability.

48 Chartered Institute of Environmental Health ([APH0166](#)); [Q67](#)

49 [Qq72-73](#)

50 Chartered Trading Standards Institute ([APH0095](#))

51 [Q37](#)

52 As above

53 [Q311](#)

RECOMMENDATION

In response to this Report, Defra should confirm it is taking steps to provide local authorities with real-time access to IPAFFS to support enforcement and traceability of consignments. Until the UK gains full access to EU systems, IPAFFS should be maintained, updated as needed, and evaluated for potential integration with EU databases to ensure continuity and efficiency during any transitional period. To achieve this, a comprehensive interoperability assessment of existing systems should be conducted across relevant national and local authorities, followed by the establishment of technical standards and data-sharing protocols aligned with EU and local systems. If deemed feasible by the assessments, within the next three months, pilot projects should be launched to test cross-border digital integration with selected local authorities and EU counterparts, helping to identify functionality gaps and inform future improvements. A publicly available roadmap should then be published, setting out clear milestones, timelines, and accountability mechanisms to guide progress toward full digital interoperability.

3 Cost, delays and administrative burden

25. Importers have faced significant challenges under the BTOM, particularly due to increased costs, delays in product movement, damages to goods, and a heavier administrative load.⁵⁴ This has been particularly difficult for ‘just-in-time’ supply chains, small and medium sized enterprises, and plant importers. Businesses told us that responses from Defra and the APHA in relation to urgent queries about goods held at the border—including at Sevington inland BCP—“have been glacial if not completely non-existent.”⁵⁵

Single Trade Window

26. In oral evidence session on 25 March, witnesses raised concerns about the administrative complexity of the BTOM, emphasising the need for a single point of data entry. The BTOM initially aimed to streamline border processes through the introduction of a digital platform—the Single Trade Window (STW)—by October 2024. The development of the STW was paused, however, by HMRC in November 2024 due to financial constraints. Katrina Walsh of the International Meat Trade Association noted that the BTOM’s 2025 ambitions have not been realised, stating that “the pausing of the Single Trade Window is a step back from trying to achieve the best border in the world.”⁵⁶ At the time the pause was announced, the Government committed to a further update as part of the Spending Review, however we have not seen any evidence of this update in the Spending Review or related documents.⁵⁷ While the recent Trade Strategy reaffirms the intention to deliver the Single Trade Window, it does not set out any details regarding the timeline or an implementation approach.⁵⁸

54 [Q189](#)

55 Horticultural Trades Association (HTA) ([APH0157](#)); SPS Certification Working Group ([APH0165](#))

56 [Q181](#)

57 Single Trade Window, [UIN HCWS188](#), 5 November 2024

58 UK Government, [The UK’s Trade Strategy](#), 26 June 2025, p69

27.

CONCLUSION

There is a need to learn from the cost overruns and delays associated with developing new digital systems such as the Single Trade Window. While an SPS deal with the EU may ease administrative burdens, the UK's global trade requires a fully functioning Single Trade Window to deliver the necessary efficiencies.

RECOMMENDATION

Future border systems must prioritise ease of use, interoperability, and support for trade growth. In its response to this Report, the Department should provide an analysis of the reasons for the Single Trade Window's delay. It should also outline the renewed timeline for the implementation of the Window and the costs associated with its development and pausing.

Common User Charge (CUC)

28. The Common User Charge (CUC)—the Government's cost recovery mechanism for operating Sevington inland BCP—has been broadly criticised for disproportionately impacting small and medium-sized enterprises. Concerns were raised to us about value for money of the CUC with Nigel Jenney, Chief Executive of the Fresh Produce Consortium, saying that “there is a huge inefficiency” at Sevington inland BCP and that an importer paying “a CUC fee of around £14,500 for a 3% inspection level” could receive “exactly the same service for £500 or less” from a commercial control point ([see Control Points below](#)).⁵⁹ Whilst there have been repeated calls for the Government to publish the operational costs of Sevington to ensure transparency and assess whether the Common User Charge offers value for money,⁶⁰ the Minister for Food Security and Rural Affairs has stated that Defra will not publish this information as it is “commercially sensitive”.⁶¹

29.

CONCLUSION

Border control posts recover costs whilst operating as the least-cost, high-efficiency solution for border checks. Industry trust in the Common User Charge has been undermined by a perceived lack of transparency in cost recovery processes and concerns over the widespread use of auto-clearance. Many stakeholders feel they are not receiving value for money. It is vital that future cost recovery mechanisms are developed collaboratively with industry.

59 [Q199](#)

60 [Q229](#)

61 Inland Border Facilities: Ashford, [UIN 611](#), 30 July 2024

RECOMMENDATION

If the Government continues to operate a BCP within the common SPS area, any cost recovery mechanism must be co-designed with industry and should not disproportionately affect small and medium-sized enterprises. In the interest of transparency, the Government should publish the operational costs of running Sevington Inland BCP.

Plant inspections

30. Between January 2021 and April 2024, inspections of high-risk plants and plant products were conducted at the Place of Destination (PoD), with full documentary checks in place. According to evidence submitted by the Horticultural Trades Association (HTA), these inspections were facilitated by the recipients of the goods, such as nurseries, who had a vested interest in maintaining high biosecurity standards and ensuring consignments were handled appropriately to avoid damage.⁶² This arrangement was always intended to be temporary. Since April 2024, inspections have been relocated to inland BCPs.
31. We have heard that the transition of plant inspections from place of destination to BCPs has exacerbated challenges for the horticultural sector.⁶³ Horticultural businesses “feel out of control of their own supply chains” and have lost valuable relationships with plant inspectors.⁶⁴ The sector is frustrated that the inadequate provision of plant inspectors at Control Points is forcing trade through BCPs.⁶⁵ We heard examples of businesses withdrawing from the UK market due to these additional burdens.⁶⁶ Chiltern Seeds, which imports seeds to sell to hobby gardeners, says that “cost and effort level are too high” to export to the UK and this is “making it difficult to even persuade seed sellers to work with UK based companies”.⁶⁷
32. In their written evidence, the HTA and the National Farmers’ Union (NFU) raised several concerns about the suitability of inland BCPs for plant inspections, including:
 - Risk of cross-contamination due to the absence of plant quarantine facilities. According to the NFU, many growers describe the BCPs as ‘infection point rather than inspection point’;

62 Horticultural Trades Association (HTA) ([APH0157](#))

63 National Farmers’ Union (NFU) ([APH0152](#))

64 [Q182](#); [Q203](#)

65 [Q196](#).

66 Getlink Group ([APH0141](#)); Chiltern Seeds ([APH0026](#))

67 Chiltern Seeds ([APH0026](#))

- Inadequate inspection standards, with consignments often not unloaded from trailers because BCPs are not equipped to handle exceptional loads;
- Damage to plants caused by unloading by untrained third parties and exposure to suboptimal conditions; and
- Use of auto-clearance, reportedly to avoid excessive waiting times and queues, which may compromise inspection rigour.⁶⁸

During its visit to Sevington Inland BCP, the Committee saw the designated space for plant inspections and noted that while the facility can conduct multiple inspections simultaneously, the inspections take place in an open environment, which may contribute to the concerns raised by stakeholders.

- 33.** The Committee also heard from Sally Cullimore of the HTA, who described a proposed hybrid model, combining BCP and PoD inspections, where specific plant products, such as trees, could be inspected by trained experts at their intended destination. The HTA argues that PoD inspections had been used for three years and were considered both more biosecure and preferred by industry compared to the current system.⁶⁹

Control Points

- 34.** Control Points (CPs) are inland inspection facilities where SPS checks of plants and plant products can take place under customs supervision. CPs have the same function as a BCP, providing the first line of control in maintaining UK biosecurity. In its written evidence, Fresh Produce Consortium says:

Control Points (CP's) may be selected as the APHA inspection location. However, Defra have knowingly restricted official inspections at these locations after encouraging industry to invest in self-managed border solutions which have several benefits including no CUC [Common User Charge] liability.

Service Level Agreements were altered from 4 to 6 hours for control points⁷⁰ without agreement when Sevington opened and there are now no CP plant health inspections offered between 7pm-7am which is when most deliveries arrive at the border.⁷¹

68 Horticultural Trades Association (HTA) ([APHO157](#)); National Farmers' Union (NFU) ([APHO152](#))

69 [Q196](#); Horticultural Trades Association (HTA) ([APHO157](#)); National Farmers' Union (NFU) ([APHO152](#))

70 APHA will aim to inspect consignments within six working hours, extended from four working hours of when APHA has access to the consignment.

71 Fresh Produce Consortium ([APHO158](#))

35.

CONCLUSION

Industry has expressed dissatisfaction with the current system of SPS checks on plants and plant products conducted at inland Border Control Posts (BCPs), citing concerns around value for money, inspection standards, and biosecurity. While a future SPS agreement with the EU may significantly reduce or remove the need for such checks, improvements to the current system are necessary to rebuild industry trust and ensure continued compliance and biosecurity in the interim. The competing demands for APHA plant inspectors across BCPs and Control Points, restricts the availability of inspections at CPs, industry's preferred location, at the time consignments arrive. Reintroducing Place of Destination (PoD) inspections for a limited number of consignments could ease pressure on the system and improve inspector availability at CPs without requiring a significant expansion of the workforce.

RECOMMENDATION

The Government should adopt the Horticultural Trades Association's proposal for a hybrid inspection model, combining BCP and PoD approaches. Following a short consultation with industry, the Government should designate specific consignments eligible for PoD inspections. Additionally, APHA should share with us its guidance on the biosecurity protocols in place for inspecting multiple consignments at inland BCPs, including measures to prevent cross-contamination.

4 Planning and delivery of future commercial biosecurity arrangements

36. The design and initial rollout of the BTOM was inherited by the Government from previous administrations. It is worth considering, however, the culture and practices within Defra that has led to its poor delivery, and how the current Ministerial team and officials can lead improvements within the Department.

Consultation and communication

37. Evidence to the Committee has highlighted longstanding communication challenges between the sector and government. Notably, the Horticultural Trades Association (HTA) and the Fresh Produce Consortium (FPC) reported that during the BTOM design phase, their proposed solutions were “outright rejected” and that their input continues to be disregarded.⁷² The FPC further highlighted that the consultation on the Common User Charge was “on a fundamentally different subject from how the fees are actually applied,”⁷³ raising concerns about the transparency and relevance of stakeholder engagement, and the ultimate buy-in of interest parties. Many in affected sectors feel that Defra has also not meaningfully consulted industry on improving border systems once in place. Logistics UK told us it had long requested a single point of contact at border posts, but Defra officials acknowledged this is only in place at Sevington, and said it is “quite tricky” to implement at commercial ports.⁷⁴
38. We have also heard that the Department does not have sufficient technical trade expertise and clear points of contact, and traders have also called for more policy officials within the veterinary facilitation team.⁷⁵ Although Defra conducts regular webinars with stakeholders, we have heard that answers to queries are not widely disseminated and sometimes take several months

72 [Q195](#)

73 [Q196](#)

74 [Q346](#)

75 SPS Certification Working Group ([APH0165](#)); International Meat Trade Association (IMTA) ([APH0068](#))

to be received. Often the advice provided by Defra does not provide “any further information than was already published on gov.uk, the lack of clarity of which being the very subject of the query.”⁷⁶

39. Further concerns were raised with the Committee that the culture of poor communication and uncertainty in Defra has persisted under the current government, particularly in relation to the implementation of checks on fruit and vegetable imports scheduled for 1 July 2025.⁷⁷ For example, during our evidence session on 20 May, the Secretary of State advised the sector to continue preparations for the introduction of these checks until told otherwise.⁷⁸ However, it was not until 2 June that the Department confirmed an extension of the implementation date to 31 January 2027. We understand that this announcement, while welcomed by many in the sector, was preceded by frustration due to the lack of engagement and communication from Defra in the period between the UK-EU summit on 19 May and the 2 June.

40. **CONCLUSION**

Future border policy development must include structured, transparent, and iterative consultation with stakeholders from the outset to ensure policies are workable and informed by the sector.

RECOMMENDATION

During the transition away from the BTOM, the Department should commit to clear timelines for decision-making, a delivery plan, and communicate changes promptly to allow businesses to plan with confidence.

Continuous improvement and compensation

41. We are aware that since the announcement of a Common SPS Area, multiple stakeholders are seeking compensation for capital and operational costs that are either redundant, in the case of importers, or unlikely to be recouped from traders in the case of ports.⁷⁹ We are also aware of reports that the Government has approached the Port of Dover and Eurotunnel to

76 SPS Certification Working Group ([APH0165](#))

77 [Q183](#)

78 [Q189](#)

79 Fresh Produce Consortium blog, [Fresh Talk Daily](#) (accessed 6 August 2025); [British Ports Association](#) (accessed 6 August 2025)

purchase and repurpose Sevington Inland BCP,⁸⁰ and if true, this means there is a presumption that there will be no need for any inland BCP checks following and SPS agreement.

42. **CONCLUSION**

Reports that the Government may be seeking to sell and repurpose the inland border control post at Sevington raises concerns about its ongoing commitment to maintaining and improving the facility while it remains operational. This demonstrates an assumption that an SPS agreement will soon remove the need for inland checks. However, given the uncertainty around the timing of any such agreement, and the significant risks associated with an animal or plant disease outbreak, continued investment in infrastructure and operational efficiency is essential to ensure effective border management in the interim. The announcement of the Common Understanding has also created uncertainty for local authorities who were anticipating recouping the costs of their investment into border facilities through charges for their use.

RECOMMENDATION

The Government should publicly clarify its intentions regarding the future of Sevington BCP, including whether it plans to sell or repurpose the site. Regardless of any future SPS agreement, Defra should commit to maintaining the facility and improving the efficiency of current border checks to ensure continued resilience and value for money. In its response to this Report, Defra should set out its position on supporting local authorities who stand to lose out financially due to the proposed agreement with the EU.

User experience

43. Evidence submitted to the inquiry has highlighted the negative impact on the people and businesses that regularly use the border system to transport animal and plant products. Stakeholders described the toll on drivers, staff, and businesses caused by lengthy delays, inadequate facilities, and ongoing uncertainty. We heard that drivers often face hours-long waits without access to basic amenities, stating that “a simple cup of coffee often can’t be obtained in waiting rooms.”⁸¹ Nigel Jenney offered a stark comparison:

80 Financial Times, [UK seeks to sell ‘Ozymandian’ Brexit checkpoint after EU deal](#), 22 May 2025

81 TLN ([APH0009](#))

No one would say to us, as we arrived at Parliament, ‘Sorry, today could you please wait outside for six hours? You might be able to get a glass of water, but nothing else.’ That is what we are doing. That is what, as a nation, we are doing on a daily basis to drivers.⁸²

The emotional and psychological strain was also emphasised by Sally Cullimore who said “I cannot emphasise how stressed everybody is[...] It is a human cost.”⁸³ These accounts underscore the urgent need for border planning to prioritise workforce and user welfare.

44.

CONCLUSION

Implementing the BTOM goes beyond logistics and finance; people are central to a successful, biosecure border. The welfare, dignity, and working conditions of those delivering and using a border system must be integral to its design and operation.

RECOMMENDATION

In its response to this Report, Defra should outline plans to reduce current wait times for hauliers at the border and outline how it intends to ensure that all drivers have 24-hour adequate welfare facilities. Any future border infrastructure and operational planning must explicitly include provisions for adequate driver facilities and realistic scheduling, to mitigate the human impact of delays and disruption.

82 [Q196](#)

83 [Q196](#)

Conclusions and Recommendations

Risk, compliance and data

1. While assessments of the effectiveness of the Border Target Operating Model (BTOM) in safeguarding UK biosecurity vary, and regardless of whether full or partial implementation would be sufficient in principle, Defra and the relevant authorities have not fulfilled their responsibilities under the BTOM in practice. As such, the question of adequacy of the system is largely academic; without effective delivery, even a well-designed model cannot achieve its intended outcomes. We are reassured by the overall level of compliance within industry, but a robust, risk-based regime is essential to maintaining standards and safeguarding biosecurity. We have real concerns that the inspection rates set out in the BTOM risk assessment are not being met and that Defra has no effective system of oversight for border controls. We are not convinced that a lack of published data on the inspection rates is due to a desire to protect the integrity of the intelligence system. We have concerns that they are not being published to avoid highlighting Defra's historic noncompliance with its own targets. (Conclusion, Paragraph 9)
2. It is essential that Defra thoroughly reviews the implementation of the BTOM. Defra should commit to this review in its response to our Report, and the review must be published no later than January 2026. It should set out why and how much variation in inspection rates is occurring between ports of entry, and how often auto clearance mechanisms are being used and the reasons for this. In its response to this Report, the Government should commit to the publication of quarterly inspection rates for all ports of entry, beginning January 2026, and to publishing historic quarterly inspection rates. (Recommendation, Paragraph 9)
3. Varying inspection rates at different ports of entry has created a system that can be gamed by those seeking to dodge costs or import illegal goods and may even introduce "temptation" for legitimate importers who witness their consignments auto-clear important processes. (Conclusion, Paragraph 10)

4. In the review proposed above, Defra should work with relevant Government departments and non-departmental delivery partners to assess the scale and nature of intentional non-compliance and outline the steps it will take to address this. These lessons should also be applied to any future UK-EU trading arrangements. (Recommendation, Paragraph 10)
5. There is a critical need for greater transparency and accuracy in the modelling and implementation of SPS controls. A failure to publish risk assessments and data informing inspection rates, limits scrutiny and undermines trust in the system. Addressing these issues through open publication and review of underlying models will support more effective, evidence-based policy and enforcement at the GB border. As such, we welcome the commitment the Minister for Biosecurity made on 6 May to review the type of data Defra will publish. (Conclusion, Paragraph 11)
6. Defra should, in response to this Report, provide us with the risk-based assessment models and underlying data used to determine SPS inspection rates. Publicly available models will enhance transparency, allow for independent scrutiny, and help rebuild stakeholder confidence in the integrity of border biosecurity measures. (Recommendation, Paragraph 11)
7. Defra maintains that a “robust” enforcement system is in operation at the Short Straits entry point. Within the context of flawed IT systems, data gaps, routine auto-clearance of goods and strained local authorities, the Committee does not share that confidence. We are particularly concerned that the absence of robust enforcement mechanisms between the Short Straits and Sevington inland BCP has created vulnerabilities that may be exploited for the illegal entry of products of animal origin into Great Britain. The current system, as it stands, risks undermining the very assurances that the BTOM was intended to deliver. (Conclusion, Paragraph 15)
8. In an annex included in the response to this Report, Defra should provide us with the August and November 2024 figures relating to the number of lorries that were directed to Sevington Inland BCP for border checks and the number of lorries that present themselves to the BCP for inspection in that same month. This would allow the committee to scrutinise compliance levels without jeopardising the dynamic nature of intelligence-led biosecurity controls. The Government should also outline what specific process it will implement to validate that goods re-exported following inspections at Sevington Inland BCP do in fact leave the UK. This process should include mechanisms for tracking consignments post-inspection and verifying their departure from UK territory, with appropriate documentation and oversight to ensure compliance. Defra should also provide, in its response to this Report, its assessment of the potential merits of creating a legal mechanism to ensure lorries transporting animal and plant products are commercially sealed. (Recommendation, Paragraph 15)

Digital Systems

9. Throughout our inquiry, we heard repeated and serious concerns about the functionality, integration, and reliability of the IT systems underpinning the UK's border biosecurity regime. As enforcement relies on data, these concerns raise fundamental questions about the Government's ability to deliver on its commitments under the BTOM. We welcome the Department's efforts to review how data are recorded and analysed within port health authority and Defra IT systems and how these can be combined to create a reliable and complete data picture. We note that the Department is now working to pre-identify commodity codes for the top five notifiable diseases to enable faster updates in future. We are also encouraged by the improved response to subsequent FMD outbreaks in Slovakia and Hungary, where IPAFFS was updated immediately in line with policy changes, preventing goods from auto-clearing controls. This demonstrates that lessons are being learned but also underscores the need for a more resilient and responsive system from the outset. (Conclusion, Paragraph 19)
10. In response to this Report, the Government should confirm that it has produced a list of pre-identified commodity codes for the top five notifiable diseases and provide a copy of this database containing the commodity codes in question to the committee. The Government should also confirm that it has established a digital team that can update IPAFFS '24-7, 365', in line with the statement from the Chief Veterinary Officer. (Recommendation, Paragraph 19)
11. It is disappointing that it required persistent questioning from the Committee over a period of three months before the Department provided answers to all our questions regarding the initial response to foot and mouth disease (FMD) outbreaks in Europe. This reflected cultural and bureaucratic issues within Defra that impeded effective scrutiny and timely adherence to parliamentary processes, ultimately creating barriers to public transparency. We are encouraged by the Minister's commitment to improve transparency and the handling of correspondence with the Committee. (Conclusion, Paragraph 20)
12. The Common Understanding with the EU presents a positive and welcome opportunity to bolster UK biosecurity and we praise the Government for its work in this regard. It remains unclear, however, how the Government sees the new arrangements working in practice. (Conclusion, Paragraph 21)
13. In response to this Report, the Government should set out its strategic objectives for shared EU-UK digital systems in the context of border biosecurity. Specifically, it should clarify whether IPAFFS will be retired in favour of adopting TRACES NT, or whether a model of integration is preferred. The Government should also outline contingency plans for

digital system continuity in the event of a breakdown in any future SPS agreement. Defra should publish a comparative analysis of the costs and benefits of both integrating IPAFFS with TRACES NT, or adopting TRACES NT wholesale, ahead of the establishment of a Common SPS Area. Any new IT systems introduced as part of this transition must undergo rigorous testing prior to deployment and be fully interoperable with existing platforms across both UK and EU jurisdictions, including those used by local authorities. (Recommendation, Paragraph 21)

14. Until a Common SPS Area is formally established, IPAFFS will remain the UK's primary digital system for managing border biosecurity. It must therefore be capable of meeting the operational needs of all users and enforcement bodies, including importers, port health authorities, and inland local authorities. The system's interoperability with EU platforms and local authority systems is essential to ensure effective enforcement and traceability. (Conclusion, Paragraph 24)
15. In response to this Report, Defra should confirm it is taking steps to provide local authorities with real-time access to IPAFFS to support enforcement and traceability of consignments. Until the UK gains full access to EU systems, IPAFFS should be maintained, updated as needed, and evaluated for potential integration with EU databases to ensure continuity and efficiency during any transitional period. To achieve this, a comprehensive interoperability assessment of existing systems should be conducted across relevant national and local authorities, followed by the establishment of technical standards and data-sharing protocols aligned with EU and local systems. If deemed feasible by the assessments, within the next three months, pilot projects should be launched to test cross-border digital integration with selected local authorities and EU counterparts, helping to identify functionality gaps and inform future improvements. A publicly available roadmap should then be published, setting out clear milestones, timelines, and accountability mechanisms to guide progress toward full digital interoperability. (Recommendation, Paragraph 24)

Cost, delays and administrative burden

16. There is a need to learn from the cost overruns and delays associated with developing new digital systems such as the Single Trade Window. While an SPS deal with the EU may ease administrative burdens, the UK's global trade requires a fully functioning Single Trade Window to deliver the necessary efficiencies. (Conclusion, Paragraph 27)

17. Future border systems must prioritise ease of use, interoperability, and support for trade growth. In its response to this Report, the Department should provide an analysis of the reasons for the Single Trade Window's delay. It should also outline the renewed timeline for the implementation of the Window and the costs associated with its development and pausing. (Recommendation, Paragraph 27)
18. Border control posts recover costs whilst operating as the least-cost, high-efficiency solution for border checks. Industry trust in the Common User Charge has been undermined by a perceived lack of transparency in cost recovery processes and concerns over the widespread use of auto-clearance. Many stakeholders feel they are not receiving value for money. It is vital that future cost recovery mechanisms are developed collaboratively with industry. (Recommendation, Paragraph 29)
19. If the Government continues to operate a BCP within the common SPS area, any cost recovery mechanism must be co-designed with industry and should not disproportionately affect small and medium-sized enterprises. In the interest of transparency, the Government should publish the operational costs of running Sevington Inland BCP. (Recommendation, Paragraph 29)
20. Industry has expressed dissatisfaction with the current system of SPS checks on plants and plant products conducted at inland Border Control Posts (BCPs), citing concerns around value for money, inspection standards, and biosecurity. While a future SPS agreement with the EU may significantly reduce or remove the need for such checks, improvements to the current system are necessary to rebuild industry trust and ensure continued compliance and biosecurity in the interim. The competing demands for APHA plant inspectors across BCPs and Control Points, restricts the availability of inspections at CPs, industry's preferred location, at the time consignments arrive. Reintroducing Place of Destination (PoD) inspections for a limited number of consignments could ease pressure on the system and improve inspector availability at CPs without requiring a significant expansion of the workforce. (Conclusion, Paragraph 35)
21. The Government should adopt the Horticultural Trades Association's proposal for a hybrid inspection model, combining BCP and PoD approaches. Following a short consultation with industry, the Government should designate specific consignments eligible for PoD inspections. Additionally, APHA should share with us its guidance on the biosecurity protocols in place for inspecting multiple consignments at inland BCPs, including measures to prevent cross-contamination. (Recommendation, Paragraph 35)

Planning and delivery of future commercial biosecurity arrangements

22. Future border policy development must include structured, transparent, and iterative consultation with stakeholders from the outset to ensure policies are workable and informed by the sector. (Conclusion, Paragraph 40)
23. During the transition away from the BTOM, the Department should commit to clear timelines for decision-making, a delivery plan, and communicate changes promptly to allow businesses to plan with confidence. (Recommendation, Paragraph 40)
24. Reports that the Government may be seeking to sell and repurpose the inland border control post at Sevington raises concerns about its ongoing commitment to maintaining and improving the facility while it remains operational. This demonstrates an assumption that an SPS agreement will soon remove the need for inland checks. However, given the uncertainty around the timing of any such agreement, and the significant risks associated with an animal or plant disease outbreak, continued investment in infrastructure and operational efficiency is essential to ensure effective border management in the interim. The announcement of the Common Understanding has also created uncertainty for local authorities who were anticipating recouping the costs of their investment into border facilities through charges for their use. (Conclusion, Paragraph 42)
25. The Government should publicly clarify its intentions regarding the future of Sevington BCP, including whether it plans to sell or repurpose the site. Regardless of any future SPS agreement, Defra should commit to maintaining the facility and improving the efficiency of current border checks to ensure continued resilience and value for money. In its response to this Report, Defra should set out its position on supporting local authorities who stand to lose out financially due to the proposed agreement with the EU. (Recommendation, Paragraph 42)

User experience

26. Implementing the BTOM goes beyond logistics and finance; people are central to a successful, biosecure border. The welfare, dignity, and working conditions of those delivering and using a border system must be integral to its design and operation. (Conclusion, Paragraph 44)

- 27.** In its response to this Report, Defra should outline plans to reduce current wait times for hauliers at the border and outline how it intends to ensure that all drivers have 24-hour adequate welfare facilities. Any future border infrastructure and operational planning must explicitly include provisions for adequate driver facilities and realistic scheduling, to mitigate the human impact of delays and disruption. (Recommendation, Paragraph 44)

Formal minutes

Tuesday 2 September 2025

Members present

Mr Alistair Carmichael, in the Chair

Sarah Bool

Charlie Dewhirst

Helena Dollimore

Sarah Dyke

Josh Newbury

Jenny Riddell-Carpenter

Tim Roca

Henry Tufnell

UK-EU trade: towards a resilient border strategy

Draft Report (*UK-EU trade: towards a resilient border strategy*), proposed by the Chair, brought up and read.

Ordered, That the Report be read a second time, paragraph by paragraph

Paragraphs 1 to 44 read and agreed to.

Summary agreed to.

Resolved, That the Report be the Fourth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Adjournment

Adjourned till Tuesday 9 September at 9.30am.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Tuesday 4 February 2025

Helen Buckingham, Chartered Environmental Health Practitioner and regulatory consultant, OneResolution; **Lucy Manzano**, Head of Port Health and Public Protection, Dover Port Health Authority; **David Smith**, South East Regional Director, Border Force

[Q1-74](#)

Tuesday 4 March 2025

Richard Griffiths, Chief Executive, British Poultry Council; **Lizzie Wilson**, Chief Executive Officer, National Pig Association; **Dr Jude McCann**, Chief Executive Officer, Farming Community Network; **Sarah Tomlinson**, lead veterinary science expert, AHDB and Technical Director, TB Advisory Service

[Q75-110](#)

Dr Christine Middlemiss, Chief Veterinary Officer, Department for Environment Food and Rural Affairs; **Dr Jenny Stewart**, Interim Chief Executive, Animal and Plant Health Agency

[Q111-179](#)

Tuesday 25 March 2025

Sally Cullimore, Technical Policy Manager, Horticultural Trades Association (HTA); **Nichola Mallon**, Head of Trade and Devolved Policy, Logistics UK; **Katrina Walsh**, Strategy Director, International Meat Trade Association; **Nigel Jenney**, Chief Executive, Fresh Produce Consortium

[Q180-239](#)

Tuesday 6 May 2025

The Baroness Hayman of Ullock, Parliamentary Under-Secretary of State, Department for Environment, Food and Rural Affairs; **Spencer Draper**, Head of Borders Delivery, Northern Ireland, Biosecurity and Trade Programme, Department for Environment Food and Rural Affairs; **Gareth Baynham-Hughes**, Director of Animal Plant Health and Welfare, Department for Environment Food and Rural Affairs

[Q240-359](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

APH numbers are generated by the evidence processing system and so may not be complete.

1	ALDI Stores Ltd	APH0151
2	ALLAM, PAULA	APH0069
3	Abrahams, Mr Andrew	APH0144
4	Adair	APH0010
5	Adamson, David	APH0155
6	Anonymised	APH0076
7	Anonymised	APH0064
8	Anonymised	APH0041
9	Anonymised	APH0038
10	Anonymised	APH0104
11	Association of Port Health Authorities	APH0079
12	Auty, Mr Stephen	APH0040
13	Barker, Iona	APH0020
14	Bee Diseases Insurance Ltd	APH0081
15	Bee Farmers Association	APH0147
16	Bee Improvement and Bee Breeders Association (BIBBA)	APH0145
17	Birnstingl, Simon	APH0037
18	Bolter-Griffin, Ms Helen	APH0043
19	Bowry, Mr Charles Henry (Port Health Technical Officer, Dover District Council Dover Port Health Authority)	APH0063
20	Bridgend Beekeepers Association	APH0030
21	British Beekeepers' Association	APH0025
22	British Horseracing Authority	APH0125
23	British Society of Plant Breeders	APH0168

24	British Society of Plant Breeders	<u>APH0150</u>
25	British Tomato Growers Association	<u>APH0028</u>
26	British Veterinary Association	<u>APH0101</u>
27	British and Irish Association of Zoos and Aquariums	<u>APH0106</u>
28	Bryant, Linda	<u>APH0003</u>
29	Bryant, Ms Jackie	<u>APH0072</u>
30	Buckingham, Helen	<u>APH0164</u>
31	Buckingham, Helen	<u>APH0162</u>
32	Buckley's Bees	<u>APH0087</u>
33	Buckley, Mr David	<u>APH0048</u>
34	Buglife - The Invertebrate Conservation Trust	<u>APH0067</u>
35	COV (Dutch Meat Association)	<u>APH0135</u>
36	Callanan, MR Paul (Port Health Technical Officer, Dover Port Health Authority)	<u>APH0070</u>
37	Canterbury Beekeepers, a branch of the Kent Beekeepers Association	<u>APH0060</u>
38	Carreck, Norman	<u>APH0119</u>
39	Cats Protection	<u>APH0071</u>
40	Chartered Institute of Environmental Health	<u>APH0166</u>
41	Chartered Trading Standards Institute	<u>APH0095</u>
42	Chester Zoo	<u>APH0113</u>
43	Chiltern Seeds	<u>APH0026</u>
44	Choi, C	<u>APH0057</u>
45	Cold Chain Federation	<u>APH0075</u>
46	Couch, Reverend John	<u>APH0031</u>
47	Cox, Mr Jon	<u>APH0029</u>
48	Cullen, Mr Mark (Hotelier, Self employed)	<u>APH0001</u>
49	Dale, Christopher James	<u>APH0018</u>
50	Department for Environment, Food and Rural Affairs	<u>APH0096</u>
51	Devon Beekeepers Association	<u>APH0056</u>
52	Dogs Trust	<u>APH0130</u>
53	Douglas, Mrs Sophie (Port Health Supervisor, Dover Port Health Authority, Dover District Council)	<u>APH0080</u>

54	Dover Port Health Authority	APH0156
55	Drinkwater, Ms Diane	APH0051
56	Dubash, Manek	APH0062
57	DunnyBees	APH0046
58	Dutch Association of Wholesalers in Floricultural Products	APH0154
59	Dyer, Mr Richard	APH0132
60	E W King & Co Ltd (Kings Seeds)	APH0036
61	Elliott, Mr Richard	APH0023
62	Elsoms Seeds Ltd	APH0161
63	Environment, Food and Rural Affairs Committee	APH0186
64	Environment, Food and Rural Affairs Committee	APH0169
65	Environment, Food and Rural Affairs Committee	APH0163
66	Estelle Hives	APH0055
67	FOUR PAWS UK	APH0122
68	Food and Drink Federation	APH0100
69	Freight Liaison Group (FLG)	APH0034
70	Fresh Produce Centre; and GroentenFruit Huis	APH0149
71	Fresh Produce Consortium	APH0158
72	Friend, Emma (Business Support Manager, Dover Port Health Authority, Dover District Council)	APH0111
73	Futura Foods UK Ltd	APH0014
74	Gardner, Mr Robert	APH0042
75	George Baker Shipping Ltd	APH0148
76	Getlink Group	APH0141
77	Harley, Mrs Emma	APH0088
78	Hinsley, Dr Amy	APH0153
79	Hitchman, Terry	APH0084
80	Hodder, Mr Andrew (Port Health Technical Officer, Dover Port Health Authority)	APH0015
81	Holdsworth, Mrs Margaret	APH0006
82	Horticultural Trades Association (HTA)	APH0157
83	Humane Society International/UK	APH0089
84	International Meat Trade Association (IMTA)	APH0068

85	JDP Honey Ltd	APH0007
86	Jardine, Ms Gordon	APH0045
87	Jenkins, Mr Peter	APH0078
88	Laird, Mr Mic	APH0012
89	Logistics UK	APH0133
90	Lune Valley Beekeepers	APH0027
91	Maclean, Mr Andrew (Port Health Technical Officer, Dover Port Health Authority)	APH0131
92	McAllister, Mr Andrew	APH0002
93	McEwen, Mrs Sarah (Port Health Team Leader, Dover District Council/Dover Port Health Authority)	APH0116
94	Mills, Miss Josephine	APH0008
95	Muskett, Mr G	APH0044
96	NFU Scotland	APH0098
97	NIAB	APH0167
98	National Farmers Union (NFU)	APH0152
99	National Office of Animal Health	APH0099
100	National Pig Association	APH0097
101	North East Lincolnshire Council / Grimsby & Immingham Port Health Authority	APH0124
102	Oliver, Mr Richard	APH0066
103	Plant Healthy Limited	APH0123
104	Provision Trade Federation (PTF)	APH0143
105	Quality Meat Scotland	APH0091
106	Quittenden, Mrs Stacy	APH0112
107	RSPCA	APH0035
108	Rees, Mr Gruffydd	APH0054
109	Rijk Zwaan	APH0086
110	Rose, Anita	APH0039
111	Royal Anthos	APH0117
112	Royal Entomological Society	APH0107
113	Seeds of Italy LTD	APH0090
114	SPS Certification Working Group	APH0165

115	Scottish Beekeepers Association	APH0073
116	Scottish Native Honey Bee Society	APH0115
117	Shilson (Port Health Technical Officer, Dover District Council)	APH0082
118	Swan, C	APH0021
119	Tamar Organics	APH0058
120	TLN	APH0009
121	Tait	APH0108
122	Tarland Bee Group	APH0093
123	Tarlinton, Dr Rachael (Associate Professor of Veterinary Virology, School of Veterinary Medicine and Science, University of Nottingham)	APH0120
124	The British Bee Company	APH0004
125	The City of London Corporation	APH0126
126	The London Borough of Hillingdon Imported Food Team	APH0109
127	The Native Irish Honey Bee Society, NIHBS	APH0139
128	The Pirbright Institute	APH0059
129	The Real Seed Collection Limited	APH0085
130	The Royal Society of Biology	APH0121
131	The South Clwyd Beekeepers Association	APH0016
132	Thomas, Jackie	APH0142
133	Tumova, Diana	APH0159
134	Tworowski, Ms Helen	APH0033
135	Tyrrell, Mr Artem	APH0053
136	Vital Seeds Limited	APH0146
137	Walmsley, Mr Alastair David	APH0052
138	West Sussex Beekeepers Association, Worthing Division	APH0074
139	West Sussex Beekeepers' Association	APH0024
140	Westerham Beekeepers (a branch of Kent Beekeepers Association)	APH0049
141	Widdicombe, Mr Joseph	APH0047
142	Wildlife and Countryside Link	APH0127
143	Williamson, Tom	APH0050
144	Wisborough Green Beekeepers Association (West Sussex)	APH0103

145	Woodland Trust	<u>APH0094</u>
146	World Horse Welfare	<u>APH0102</u>
147	Wraight, Miss Louise (Port Health Technical Officer, Dover Port Health Authority)	<u>APH0077</u>
148	Wrigley, John	<u>APH0017</u>

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website.

Session 2024–26

Number	Title	Reference
3rd	Biosecurity at the border: Britain's illegal meat crisis	HC 1296
2nd	Priorities for water sector reform	HC 1001
1st	The Government's vision for farming	HC 906
2nd Special	The Government's vision for farming : Government Response	HC 1255
1st Special	Pet welfare and abuse: Government response	HC 581