

Environment, Food and Rural Affairs Committee

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# UK-EU agritrade: making an SPS agreement work

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Fifth Report of Session 2024–26

HC 1661

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# 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.

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## Publication

This Report, together with formal minutes relating to the Report, was Ordered by the House of Commons, on 28 January 2026, to be printed. It was published on 5 February 2026 by authority of the House of Commons.

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# Contents

<b>Summary</b>	<b>1</b>
Our inquiry	2
Scope of the report	3
<b>1 Aligning SPS policy</b>	<b>4</b>
Animal Welfare	4
Plant Protection Products	8
Mycotoxins	8
Precision Breeding	9
<b>2 Implementation timeline</b>	<b>11</b>
Managing uncertainty	13
<b>3 UK-wide approach</b>	<b>15</b>
Consultation and coordination	15
The internal market	15
Veterinary medicine access in Northern Ireland	18
<b>4 Biosecurity at the border</b>	<b>20</b>
Plant biosecurity	21
Britain's illegal meat crisis	23
Personal Imports	24
<b>5 Border Infrastructure</b>	<b>27</b>
Rest of World imports	27
Redundant border infrastructure	28
<b>6 Resourcing and oversight</b>	<b>30</b>
The role of Parliament	31
<b>Conclusions and recommendations</b>	<b>34</b>

<b>Formal minutes</b>	<b>41</b>
<b>Witnesses</b>	<b>42</b>
<b>Published written evidence</b>	<b>43</b>
<b>List of Reports from the Committee during the current Parliament</b>	<b>47</b>

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# Summary

1. We recognise the potential benefits that a UK–EU Sanitary and Phytosanitary (SPS) agreement could deliver for farmers, producers, and consumers. By reducing checks, costs, and friction on agrifood trade, such an agreement has the potential to improve the resilience of supply chains, support food security, and strengthen the competitiveness of UK agriculture. Achieving these gains, however, will require negotiations to be conducted with full regard for the regulatory, constitutional, and operational implications that a common SPS area will have on the UK and its agri-food sector.
2. A central matter to resolve is the scope of the negotiations. The Government must urgently clarify whether on-farm animal welfare and food labelling fall within scope, given the significant implications for future legislative planning and industry preparedness. The UK is proudly recognised as a global leader in animal welfare, and it is essential that these high domestic standards can be maintained. Therefore, we consider it is vital that the Government seeks exemptions from dynamic alignment with the EU for animal welfare. Alongside safeguarding regulatory autonomy, the Government must also ensure that UK farmers are not undercut by imports produced to lower welfare standards.
3. Similarly, precision breeding represents an area in which dynamic alignment could constrain innovation. England’s Precision Breeding Act provides a first-mover advantage that would be undermined by waiting for EU processes to conclude. The Government should therefore continue implementation at pace and seek a targeted exemption from dynamic alignment in this area.
4. We are also concerned about the potential adoption of certain EU rules, particularly relating to limits of naturally occurring mycotoxins and plant protection products, that have been developed since the UK left the EU and therefore without reference to GB-specific climatic, agronomic, and scientific evidence. Any SPS agreement must therefore ensure that British data and expertise are fully considered in the development of new regulations, and that decisions applied to Great Britain are appropriate for domestic production conditions.
5. More broadly, there is a clear need for realistic implementation periods, stable border policy, and timely, transparent communication with industry, port health authorities, and local government. Negotiations must take full account of devolved responsibilities and internal market implications and

ensure that biosecurity protections remain robust while enabling efficient trade with the rest of the world. Adequate resourcing for Government departments and frontline agencies, including the Food Standards Agency and Food Standards Scotland, will be essential to deliver the substantial operational and legislative programme required.

6. Dynamic alignment with the EU on SPS policy represents a significant constitutional development. There is a need for a clear system of parliamentary scrutiny and for the Government to communicate honestly and accessibly with the public about the benefits and constraints of this model.
7. We will continue to scrutinise both the negotiations and any eventual SPS agreement, as well as its implementation. As part of our ongoing and iterative programme of work, we consider it our responsibility to ensure that the interests of UK producers, consumers, and biosecurity are upheld throughout the development and operation of a future UK–EU common SPS area.

## Our inquiry

8. This report into UK-EU Sanitary and Phytosanitary (SPS) negotiations is the third report of our thematic and iterative inquiry into Animal and plant health. As part of this long-term piece of work, in September 2025, we published substantive reports on both commercial and illegal imports and visited the Friedrich-Loeffler-Institut for animal health in Germany and border facilities at Dover. Our previous reports considered the efficacy of biosecurity measures at the border covering both commercial trade and illegal meat imports.<sup>1</sup>
9. Following the 19 May 2025 UK-EU Summit and the publication of the ‘Common Understanding’,<sup>2</sup> and while developing the aforementioned reports, the Committee launched a call for evidence in July on the proposed SPS agreement. We received 93 responses, including on how it should be negotiated, implemented, and integrated into the UK’s wider food, farming, and environmental goals. We also visited the European institutions in Brussels,<sup>3</sup> the John Innes Centre in Norwich<sup>4</sup> and held four oral evidence

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1 Environment, Food and Rural Affairs Committee, Third Report of the Session 2024–26, [Biosecurity at the border: Britain’s illegal meat crisis](#), HC1926, 8 September 2025; Environment, Food and Rural Affairs Committee, Fourth Special Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy](#), HC1927, 15 September 2025

2 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

3 Environment, Food and Rural Affairs Committee ([APH0265](#));

4 Environment, Food and Rural Affairs Committee ([APH0169](#))

sessions scrutinising aspects of the UK-EU SPS deal with Defra Ministers, the Secretary of State, the Food Standards Agency and Food Standards Scotland.

## Scope of the report

10. On 13 November 2025, the Council of the European Union formally authorised the European Commission to open negotiations. We are not part of the Government's negotiations with the EU, and our understanding of the status, progress and sensitivities of the negotiations is drawn from the extensive evidence we have gathered from UK, EU and 'third country'<sup>5</sup> stakeholders across business, industry, food production, farming, the veterinary profession and those involved in border operations. This report is our first public statement, setting out to the Government the key factors that must be considered throughout negotiations with the EU; it is unlikely to be our final word on the matter. It relates almost entirely to the development of a Sanitary and Phytosanitary (SPS) agreement. This report does not consider elements of the wider "UK-EU reset" that are beyond this Committee's remit, such as energy cooperation, security matters, or freedom of movement.

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5 Countries that are not members of the European Union, in this case Switzerland and Norway



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# 1 Aligning SPS policy

11. Since the UK's departure from the EU, there has been both passive and active divergence from EU regulations. As stated in the Common Understanding, a common SPS area will require Great Britain to align dynamically with EU regulations that fall within the scope of the SPS agreement. A short list of exceptions to dynamic alignment could be allowed if they do not lower standards or harm EU market access, and if only EU-compliant goods enter the EU.<sup>6</sup>

## Animal Welfare

12. On 22 December 2025, the Government published the Animal Welfare Strategy for England. The strategy aims to implement improvements for animal welfare on-farm, in transport and at slaughter.<sup>7</sup> The Government also seeks to improve international animal welfare and will “promote the importance of high animal welfare standards and best practice as part of our bilateral and international relations.”<sup>8</sup> There have been calls for clarity on what is and is not within the scope of the SPS negotiations.<sup>9</sup> Whilst it is anticipated that animal health legislation, along with animal welfare during transport and at time of killing, will be within scope, it is not yet known whether animal welfare at farm level or method of production labelling will be within the scope of the agreement.<sup>10</sup> Geoff Ogle, Chief Executive of Food Standards Scotland, explained that “labelling is classed as a technical barrier to trade. It comes under the general consumer protection rules, so we will have to see where we land in terms of the agreement around what the implications are for labelling.”<sup>11</sup> When asked about the progress of the Department's ongoing policy development on labelling, the Farming Minister, Dame Angela Eagle MP, said:

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6 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

7 Proposals include ending colony cages for hens by 2030, ending extended use of pig farrowing crates and reviewing the welfare code for cattle.

8 [Defra, Animal welfare strategy for England, 22 December 2025](#)

9 Wildlife and Countryside Link ([APH0204](#))

10 National Pig Association ([APH0239](#))

11 [Q386](#)

We are still considering a method of production labelling. The slight issue that we have at the moment is the SPS talks with the EU. We cannot suddenly diverge and do things completely differently, if we then have to dynamically align with EU labelling methods.<sup>12</sup>

13. The EU is currently preparing to reform aspects of its animal welfare legislation, including phasing out cages and strengthening welfare standards for imported animals and food.<sup>13</sup> It is expected that the EU will soon publish proposals to amend on-farm welfare legislation following the closure of its public consultation in December 2025.<sup>14</sup> The Commission has also proposed to strengthen animal welfare during transport, including stricter rules on maximum journey times, temperature limits, and minimum age for transport. These proposals were unveiled in December 2023; however, progress towards them has been delayed.<sup>15</sup>
14. In Brussels, we spoke with officials from Norway and Switzerland, both of which have agreements with the EU that provide for some level of dynamic alignment. They emphasised the importance of early engagement with EU policymaking, while Norway highlighted the benefits of proactive dialogue to help shape outcomes during the initial stages of developing new EU legislation.<sup>16</sup> As part of its animal welfare strategy, the UK Government has stated that it will continue to monitor the progress of EU animal welfare reforms. However, Rt Hon Baroness Hayman of Ullock, Parliamentary Under-Secretary of State at Defra, noted that it was difficult to become proactively involved with EU policy reforms during ongoing UK-EU negotiations.<sup>17</sup>

15. **CONCLUSION**

The Government must urgently clarify whether onfarm animal welfare and labelling will be included in negotiations with the EU of an SPS agreement so it can properly develop any future legislative changes, prepare industry for reforms and so those changes can be properly scrutinised.

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12 [Q298](#)

13 European Commission, [Vision on Agriculture and Food \(2025\)](#), 19 February 2025

14 European Commission, [public consultation regarding on-farm animal welfare for certain animals](#), accessed 16 January 2026

15 British Agriculture Bureau, [Progress stalls on welfare during transport proposals](#), 31 July 2025

16 Environment, Food and Rural Affairs Committee ([APH0265](#))

17 [Q526](#)

16.

**RECOMMENDATION**

The Government and EU should establish the scope of the SPS negotiations as a priority and publish this information on an interim basis, prior to the conclusion of negotiations, to enable effective consultation and scrutiny.

17. Regardless of the outcomes of European reforms on animal welfare policy, the Government has committed to not lowering food standards and will uphold high animal welfare standards as part of its approach to trade.<sup>18</sup> Baroness Batter's Farming Profitability Review states that the since leaving the EU, England has raised its level of environmental and animal welfare legislation and regulation above those adopted by the EU which has come at a cost to some UK food producers.<sup>19</sup> In her speech to the Oxford farming conference this year, Rt Hon Emma Reynolds MP, the Secretary of State for the Environment, Food and Rural Affairs, outlined the Government's commitment to improve farmer's productivity and profitability,<sup>20</sup> however Baroness Batter emphasises in her review that:

Our farmers should be rightly proud of the quality of their produce and the higher welfare and environmental requirements they meet. However, to ensure our farmers are not put at a competitive disadvantage, we must ensure they are not undercut with cheaper imports produced to less stringent standards.<sup>21</sup>

18. The EU's acceptance of Switzerland's animal welfare exemptions from dynamic alignment establishes a clear precedent for negotiations (see box 1).<sup>22</sup> We have heard that a Swiss-style carve out within an UK-EU SPS agreement would preserve the UK's abilities to restrict low-welfare imports and prohibit imports produced using practices already banned domestically.<sup>23</sup> Despite this, concerns have been raised that, even if the UK manages to negotiate an exemption for animal welfare, EU farmers could still have an unfair advantage over domestic food producers if they do not have to follow the same high standards in production but have unlimited access to the UK market.<sup>24</sup>

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18 [Defra, Animal welfare strategy for England, 22 December 2025](#); Department for Business and Trade, [The UK's Trade Strategy](#), 25 July 2025; Department for Environment, Food and Rural Affairs ([APH0252](#))

19 Defra, [Farming Profitability review](#), 18 December 2025

20 Gov.uk, [Secretary of State's address to 2026 Oxford Farming Conference](#), 8 January 2026

21 Defra, [Farming Profitability review](#), 18 December 2025, pg 51

22 FOUR PAWS UK ([APH0185](#)); Animal Policy International ([APH0197](#)); Wildlife and Countryside Link ([APH0204](#)),

23 Jeremy Collier Foundation ([APH0216](#)); FOUR PAWS UK ([APH0185](#))

24 Compassion in World Farming ([APH0172](#)); Humane World for Animals UK ([APH0246](#))

### Box 1: Swiss exemption to dynamic alignment for animal welfare

Article 7 of the Swiss-EU Protocol on Trade in Agricultural Products sets out the Swiss exemptions from dynamic alignment with the EU for animal welfare under its SPS agreement with the Union.<sup>25</sup> This allows Switzerland to maintain higher standards whilst still benefiting from reduced trade barriers. Switzerland may continue to apply its own national laws in the following cases:

- Welfare standards for animals kept for farming purposes
- Domestic animal transport, including the rule that most animals transported for slaughter may pass through Switzerland only by rail or air
- Mandatory consumer labelling related to the disclosure of forced feeding and other painful procedures without anaesthesia
- Labelling for cage-rearing of rabbits and laying hens, and
- Import bans on furs and fur products produced in a cruel manner

19.

#### CONCLUSION

The Government must not allow UK farmers and food producers to be undercut by cheaper imports produced to lower welfare standards, in line with its repeated commitments to not lower food standards and uphold high animal welfare standards in trade agreements. This risk is heightened by the proposals to raise onfarm welfare standards set out in the Animal Welfare Strategy, which will affect producers regardless of whether onfarm welfare ultimately falls within the scope of the SPS negotiations. A Swiss-style animal welfare carveout exemption for the UK would preserve the UK's ability to maintain and enhance domestic animal welfare standards within a common SPS area.

20.

#### RECOMMENDATION

The UK Government should seek specific exemptions from dynamic alignment with the EU on animal welfare standards.

21.

#### RECOMMENDATION

The Government must prevent UK food producers from being undercut by EU imports produced to lower animal welfare standards within a future common SPS area. In its response to this report, the Government should set out the practical measures it will take to protect producers.

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25 [Swiss-EU Protocol on Trade in Agricultural Products](#)

## Plant Protection Products

- 22.** Since the UK's departure from the EU, there has been both passive and active divergence from EU regulations. These include in the approval and availability of agricultural inputs such as feed additives and plant protection products (PPPs) and permitted levels of naturally occurring toxins from fungi within crops (mycotoxins). According to the Agricultural Industries Confederation (AIC), there are approximately 39 active PPP substances available in GB that are not authorised in the EU while around 68 substances are available in the EU but not GB.<sup>26</sup>
- 23.** CropLife UK argues that any UK-EU SPS agreement must protect the UK's regulatory autonomy, including the currently faster approvals for new PPPs which give farmers earlier access to products suited to domestic conditions. CropLife UK cautions that these gains could be lost if the UK realigns with EU rules, leaving UK growers at a competitive disadvantage to EU farmers whom, unlike in England, continue to receive financial support for food production through the Common Agricultural Policy.<sup>27</sup>
- 24.** Stakeholders also warn that as post-Brexit EU regulatory decisions have been made without regard to the UK's climate or soil conditions, compliance with EU regulations may be challenging, or in some cases not possible for British growers.<sup>28</sup> Defra Minister Baroness Hayman told us that she was "very aware" that stopping the use of certain PPPs would cause difficulties for some farmers and growers but that she was "was working very closely with industry to fully understand the impact of full alignment in certain areas regarding pesticides."<sup>29</sup>

## Mycotoxins

- 25.** For example, in respect of the mycotoxin, DON (deoxynivalenol, also known as 'vomitoxin') which affects grains, the EU updated its Regulation (EU) 2023/915, lowering limits for this substance (and introducing new limits for HT-2 and T-2 toxins, which commonly affect oats). However, these changes were made in the EU without taking account of British evidence. If Britain has to align with these regulations, there could be a significant impact on producers, particularly in Scotland, where wetter conditions increase the risk of mycotoxin contamination.<sup>30</sup>

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26 Agricultural Industries Confederation (AIC) ([APH0182](#))

27 CropLife UK ([APH0236](#))

28 CropLife UK ([APH0236](#)); Food and Drink Federation ([APH0213](#)); National Farmers Union (NFU) ([APH0152](#))

29 [Q507](#)

30 [Q384](#); National Farmers Union (NFU) Scotland ([APH0198](#)); National Farmers Union (NFU) ([APH0152](#)); Food and Drink Federation ([APH0213](#))

26. In addition, Great Britain currently has no legal limits for HT-2 and T-2, raising concerns about future trade and regulatory alignment. Scotland Food and Drink has warned that adopting EU rules without considering UK-specific climate and production conditions could harm local businesses.<sup>31</sup> The National Farmers' Union has urged the Government to pursue sufficient "technical adaptations" to EU rules in line with the provisions that allow Member States to adapt the rules to suit their own climatic or regional circumstances.<sup>32</sup> The FSA and FSS are in the process of revising the risk assessment for British exposure to these toxins and results are expected in early 2026.<sup>33</sup>

27. **CONCLUSION**

Legislative divergence between the UK and EU has occurred given the EU no longer considers GB-specific scientific evidence, such as climatic conditions relevant to mycotoxin formation or the agronomic need for certain plant protection products (PPPs). As such, full adoption of EU rules in this area would risk embedding regulatory decisions that are inappropriate for GB production systems.

28. **RECOMMENDATION**

The Government should ensure in negotiations that GB will only adopt new EU regulations on PPPs and mycotoxin limits where GB climate, growing conditions and scientific data have been fully considered in their development. It should seek assurances, as a core requirement of any SPS framework, that GB scientific evidence, including agronomic and climatic data, will be incorporated into all new science based decisions affecting UK agriculture.

## Precision Breeding

29. The Genetic Technology (Precision Breeding) Act 2023 removes precision bred organisms (PBOs) from the regulatory system of genetically modified organisms (GMOs) in England. The secondary legislation to implement the Act in relation to plants came into force on 13 November, enabling biotechnology and seed companies to apply for authorisation to grow, sell and import precision bred (PB) seeds, plants, food and feed in England. Precision breeding falls within the scope of the SPS agreement.
30. On 4 December the European Council reached a provisional agreement with the European Parliament on a set of rules that establish a legal framework for new genomic techniques (NGTs) which is the term used by the EU

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31 Scotland Food & Drink ([APH0238](#))

32 National Farmers Union (NFU) ([APH0152](#))

33 [Q384](#)

to describe precision breeding methods.<sup>34</sup> The provisional agreement guarantees a simplified process for NGT plants which will be considered equivalent to conventional bred plants.<sup>35</sup> Notable differences to English legislation include the EU's exclusions of NGTs used for animal breeding and certain crop traits including resistance to herbicides.

31. On 20 May 2025, the day after the UK-EU 'reset' Joint Summit, the then Defra Secretary of State, Rt Hon Steve Reed MP, told us that he believed the Government would seek an exemption from dynamic alignment with the EU for precision-bred products,<sup>36</sup> a policy broadly welcomed by the growers and the agri-tech sector.<sup>37</sup>

32. As of 27 January there are no PBO products listed on the precision breeding register which is a requirement prior to release on the UK market. During our visit to the John Innes Centre in June 2025, we heard that England has 'first-mover' advantage over the EU and is an attractive place for research, innovation and industry development of PBOs due to the new legislation.<sup>38</sup> These benefits could be lost if there is regulatory inertia or delays to approvals whilst awaiting the outcome of the SPS negotiations.

### 33. **CONCLUSION**

The EU's forthcoming new genomic technology (NGT) framework could take several years to be finalised, and waiting for alignment between the EU and UK on precision breeding would undermine England's first-mover advantage and stall the development and release of PBOs.

### 34. **RECOMMENDATION**

The Government should continue implementing England's Precision Breeding Act, actively progress regulatory procedures to bring precision bred plants to market, and seek a targeted exemption for precision breeding in negotiations with the EU on the SPS agreement.

34 European Council, Council of the European Union, [New genomic techniques: Council and Parliament strike deal to boost the competitiveness and sustainability of our food systems](#), 4 December 2025

35 The agreement distinguishes between two categories of NGTs. NGT1 plants are considered equivalent to conventional plants and, except for seeds and other reproductive material, will not require product labelling; an exclusion list prevents traits such as herbicide tolerance and production of known insecticidal substances from falling under this category. NGT2 plants involve more complex or less nature equivalent modifications and will remain subject to existing GMO rules, including mandatory labelling, with Member States retaining the ability to opt out of their cultivation.

36 Oral evidence taken 20 May 2025, [Q183], Rt Hon. Steve Reed MP

37 National Farmers Union (NFU) ([APH0152](#)); Syngenta ([APH0250](#)); Agricultural Industries Confederation (AIC) ([APH0182](#)); CropLife UK ([APH0236](#))

38 Environment, Food and Rural Affairs Committee ([APH0169](#))



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## 2 Implementation timeline

- 35.** The Cabinet Office has said that it hopes the negotiations to establish a common SPS area with the EU are completed by early-2027 and implemented in the first half of the same year.<sup>39</sup> While the removal of barriers at the EU border would bring significant benefits, the divergence from EU agrifood rules means that time will be required to revert or realign to EU standards. For example:
- The Food and Drink Federation (FDF) estimated that implementation would take at least 24 months including considerations for the sellthrough of British crops used in manufacturing and the shelf life of products impacted by regulatory changes;<sup>40</sup>
  - The Fresh Produce Consortium said implementation timescales must consider growing cycles, international supply chains and transport times (up to six weeks at sea), crop storage (up to 9–12 months) and produce that is manufactured, frozen, canned or dehydrated, which may remain in circulation for three years or longer;<sup>41</sup>
  - CropLife UK stated that if British growers lose access to certain plant protection products, at least three years would be required to allow production to wind down, for supply chains to use existing stocks, and for new or emergency authorisations to be issued.<sup>42</sup>
- 36.** Port and local health authorities also highlighted the need for clear guidance and time to implement changes at the border. Suffolk Coastal Port Health Authority (PHA) and East Suffolk Council have highlighted the expected new border regime when the Common SPS area is implemented will be the fourth major change in six years and “the disruption, uncertainty and weariness it causes is palpable.”<sup>43</sup> London PHA said that repeated changes to major policy “has had a direct and challenging impact” on PHA staff and incur costs when local authority budgets are under pressure.<sup>44</sup> Several have indicated that a transition period of 12 to 24 months would

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39 HC Debate, 17 December 2025, [col 949](#); HC Debate, 4 December 2025, [Cabinet Office Questions](#)

40 Food and Drink Federation ([APH0213](#))

41 Fresh Produce Consortium ([APH0244](#))

42 CropLife UK ([APH0236](#))

43 Suffolk Coastal Port Health Authority ([APH0210](#))

44 City of London Corporation - London Port Health Authority ([APH0233](#))



be required to implement a new border policy.<sup>45</sup> Suffolk Coastal PHA emphasised the need for “a published outline roadmap and timeframe of key milestones, with visibility 18–24 months in advance, to enable appropriate planning.”<sup>46</sup>

37. EU law traditionally provides Member States with mechanisms to manage transitions to new requirements. In most cases, this occurs through Directives, which set out obligations but allow Member States, typically over a period of around 24 months, to introduce the necessary national legislation. The European Commission then oversees the process to ensure that the rules are correctly transposed. Even in the case of Regulations, which are directly applicable, the transition to new requirements will typically be eased, for example through phased implementation for new systems (such as the EU Entry/Exit System) or through transitional frameworks that permit a gradual adaptation to new obligations.<sup>47</sup>
38. When asked about preparing businesses to comply with new legislation in December 2025, Emily Miles, Director General for Food, Biosecurity and Trade at Defra, told the Committee that, “until the negotiations are concluded, we cannot know for certain when and how much alignment will be required.”<sup>48</sup> Defra told us that transition timelines would form part of the negotiations but confirmed that internal discussions were already underway within Government on how to ensure businesses and ports receive sufficient notice.<sup>49</sup>

39. **CONCLUSION**

It is essential that sectors are given sufficient time to adapt to regulatory changes introduced by an SPS agreement. This ensures compliance without causing unnecessary disruption and reflects timeframes afforded to EU member states.

40. **RECOMMENDATION**

The Government should secure an implementation period of at least 24 months for sectors to make necessary adjustments resulting from the SPS agreement. Once a common SPS area is established all legislative changes adopted under dynamic alignment must include a mechanism to manage transitions similar to that afforded to EU Member states.

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45 Suffolk Coastal Port Health Authority ([APH0210](#)); Dover Port Health Authority ([APH0227](#)); City of London Corporation - London Port Health Authority ([APH0233](#))

46 Suffolk Coastal Port Health Authority ([APH0210](#))

47 European Commission, [Implementing EU law](#), accessed 16 January 2026

48 [Q446](#)

49 [Qq496–497](#); [Q513](#)

41.

#### **CONCLUSION**

Frequent border policy changes over recent years have created disruption, uncertainty and financial pressure for port health and local authorities. Stakeholders are clear that another shift in border regimes will only be manageable if timelines are realistic, communicated early, and not subject to repeated revisions or delays.

42.

#### **RECOMMENDATION**

The Government should provide a clear, realistic transition timetable for moving to a common SPS area, published with key milestones at least 12–24 months in advance. This must not be subject to repeated changes, and implementation plans should be developed with businesses, industry, port health and local authorities.

## **Managing uncertainty**

43.

Negotiations on the SPS agreement are ongoing, with the Government expressing an ambition, not a fixed deadline, to conclude by early 2027.<sup>50</sup> Although we saw there was appetite from UK and EU officials to conclude an SPS deal as soon as possible and that achieving one by June 2027 is feasible, officials in Brussels noted that some Member States fear a future UK government could reverse any agreement, raising concerns about its longterm stability.<sup>51</sup>

44.

Both the FSA and FSS are re-prioritising its work and “generally slowing or pausing reform work that would increase divergence, except in cases where there is a compelling reason for that work to continue, such as the need for action to protect public health.”<sup>52</sup> For example Katie Pettifer, Chief Executive of FSA said that it was pausing its work on market authorisation reforms but “If the SPS agreement were not to go ahead, I am sure that we would want to return to that and pursue it.”<sup>53</sup>

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50 HC Debate, 17 December 2025, [col 949](#);

51 Environment, Food and Rural Affairs Committee ([APH0265](#))

52 Correspondence from the Food Standards Agency and Food Standards Scotland following evidence session on 21 October 2025, [dated 9 December 2025](#)

53 [Q390](#)

45.

**CONCLUSION**

The Government and EU leadership broadly support reaching an SPS agreement, and it is currently feasible that the June 2027 ambition can be met. However, the Government must consider what will happen if negotiations take longer or ultimately fail, ensuring that day-to-day functions such as biosecurity, border operations, and regulatory oversight continue uninterrupted. While some degree of regulatory inertia is inevitable, it must be kept to a minimum.

46.

**RECOMMENDATION**

The Government should set out, in response to this report, its contingency plans for the SPS negotiations, recognising that an SPS agreement is not guaranteed. These should set out how core functions such as biosecurity, border operations, and regulatory oversight will continue if negotiations take longer or fail, and how reprioritisation of resources will be managed to avoid undermining critical work.

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## 3 UK-wide approach

### Consultation and coordination

47. SPS policy is a devolved matter, while the negotiation of international trade agreements is reserved. The UK Government therefore leads SPS negotiations with the EU, but implementation of any agreement will require legislative changes by the devolved administrations. Officials from the devolved administrations reported active engagement in policy development and in the wider UK–EU reset,<sup>54</sup> but expressed concern about limited involvement during the final stages of previous UK–EU negotiations and called for stronger formal and informal mechanisms to ensure meaningful participation on this occasion.<sup>55</sup> On 10 November 2025, the Scottish Government published a position paper outlining its priorities for the SPS negotiations.<sup>56</sup> It stressed the need for any agreement to reflect the interests of Scotland’s farmers and food and drink producers, including its distinct context on innovation, climate-related risks and economic conditions. The Welsh Government said there are a number of areas where Wales has diverged from EU regulation, and in some cases from UK regulation. It has called for the UK Government to ensure that exceptions are negotiated that retain Wales right to regulate, where there is a need to do so.<sup>57</sup>

### The internal market

48. Prior to leaving the EU, the UK operated under a single SPS approach aligned with EU rules. Since then, there has been varied levels of divergence between nations in areas potentially within the scope of an SPS agreement, such as animal welfare and precision breeding (see [chapter 1](#)). A future UK–EU SPS agreement would require the Great Britain as a whole to align dynamically with EU regulations and therefore reintroduce a common approach to SPS policy. Domestic realignment is expected to simplify

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54 The Welsh Government ([APH0021](#))

55 Environment, Food and Rural Affairs Committee ([APH0265](#))

56 Scottish Government, [Scottish Government priorities for UK-EU negotiations: position paper](#), 10 November 2025

57 The Welsh Government ([APH0021](#))

agri-food trade and support the internal market, however any negotiated exemptions with the EU, for example precision breeding, could remain a barrier to trade internal to the UK.

49. Under the United Kingdom Internal Market Act 2020 (UKIMA), food and feed from authorised PBOs in England can be sold in Wales and Scotland however they cannot be grown or processed there.<sup>58</sup> UKIMA principles do not cover further processing of these goods in Wales and Scotland, where they would still be subject to assimilated GMO regulations. This was summarised to the Committee by Geoff Ogle, Chief Executive of FSS, who explained that:

Let us take a precision-bred tomato. If the precision-bred tomato is produced in England, it can be sold in Scotland. If the precision-bred tomato is used to make a lasagne in England, it could be sold in Scotland. If a producer in Scotland bought a precision-bred tomato, they could not sell it in Scotland. If they turned it into a lasagne, they could not sell it in Scotland, but they could sell it in England.<sup>59</sup>

50. Katie Pettifer told the Committee that businesses will need to take legal advice on these matters.<sup>60</sup> An added layer of complexity arises from the fact that there is no requirement in England to label precision-bred products. As a result, food manufacturers outside of England may be unaware that the ingredients they are sourcing from England (whether processed or not) are precision-bred or contain PBOs. When asked by the Committee how these internal market challenges could be addressed, Emily Miles, Defra Director General for Food, said that it was “complex” and that “Pre-Brexit, it would have been a single approach across the four nations because of alignment with the EU.”<sup>61</sup>

51. **CONCLUSION**

The Committee did not receive a clear or satisfactory explanation of how the Government intends to address UK internal market issues created by the England-only Precision Breeding Act.

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58 Food and feed policy for Northern Ireland aligns with that of the EU under the Windsor Framework

59 [Q402](#)

60 [Q402](#)

61 [Q451](#)

52.

**RECOMMENDATION**

In response to this report, the Government should provide the Committee with a clear, timebound strategy for addressing market barriers to trade within the UK, including structured engagement with devolved governments and options for mutual recognition, common frameworks or targeted legislative changes to ensure that supply chains can function effectively.

53.

The Government has also outlined expected benefits of an SPS agreement in easing barriers to trade between Great Britain and Northern Ireland. Under the Windsor Framework, Northern Ireland already follows EU SPS policy to maintain access to the EU single market. The Common Understanding notes that, if fully implemented, the SPS Agreement would reduce the controls currently required on GB–NI movements, while the Windsor Framework would continue to ensure Northern Ireland’s distinct dual access to both the EU Single Market and the UK internal market.<sup>62</sup> While we have not directly scrutinised the topic, it has been addressed by other committees in other recent reports, including the Northern Ireland Scrutiny Committee’s report, *Northern Ireland after Brexit: Strengthening Northern Ireland’s voice in the context of the Windsor Framework*.<sup>63</sup>

54.

**CONCLUSION**

SPS negotiations have significant implications for the devolved administrations. While the UK Government leads negotiations, it must take account of the specific needs and priorities of each nation, including regional conditions. Internal market challenges, such as those arising from England’s precision breeding legislation, could be mitigated by a UK–EU SPS agreement, provided alignment and carve-outs are carefully managed.

55.

**RECOMMENDATION**

The Government should ensure that the devolved administrations have a formal consultative position in the negotiations, and outline, in response to this report, the meetings and other mechanisms for this. The Government should also consider the UK-EU SPS agreement as an opportunity to strengthen the UK internal market and hold discussions with counterparts in the devolved administrations on the best way to do so.

62 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

63 Northern Ireland Scrutiny Committee, [Northern Ireland after Brexit: Strengthening Northern Ireland’s voice in the context of the Windsor Framework](#), First Report, Session 2024–26, HL Paper 182, 15 October 2025

## Veterinary medicine access in Northern Ireland

56. Veterinary medicines are currently outside the scope of the SPS negotiations, but are included within the Windsor Framework, which will continue to function on the island of Ireland as per the Common Understanding.<sup>64</sup> Whilst grace periods have been previously granted, EU rules governing the distribution of veterinary medicines in Northern Ireland have applied in full since 1 January 2026. In June 2025 the Government said that out of around 3,000 products licensed for supply in Northern Ireland, it expects very limited disruption, with “... fewer than 20 products due to face discontinuation that we consider are likely to result in significant adverse impacts if not addressed.”<sup>65</sup>
57. On 26 November 2025, the House of Lords Northern Ireland Scrutiny Committee wrote to the Government warning that the expiry of the grace period for veterinary medicines at the end of December posed serious risks to animal and public health in Northern Ireland.<sup>66</sup> The warning came amid mounting concern from eight major veterinary, agricultural and animal-health organisations, who wrote jointly to Baroness Hayman, Defra Biosecurity, Borders and Animals Minister,<sup>67</sup> seeking clarity on how the two new schemes<sup>68</sup> aimed at supporting access to veterinary medicine (the Veterinary Medicines Internal Market Scheme (VMIMS) and Veterinary Medicines Health Situations Scheme (VMHSS)) will operate in practice. These groups caution that without better coordination there could be “disruption, increased cost pressures, rising workload and avoidable disease pressure” at a time when the veterinary workforce was already overstretched.
58. Baroness Hayman told us that the Government had “worked really hard” to reduce the number of delisted products and to put alternative supply schemes in place for medicines that could not be accessed through normal routes. She stressed that these schemes now needed to be “monitored very, very carefully” and that any “glitches or unexpected consequences” must

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64 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

65 Gov.uk [Protecting Animal Health: The Government’s Approach to Veterinary Medicines in Northern Ireland](#), 19 June 2025

66 Letter from Northern Ireland Scrutiny Committee, to the Cabinet Office on Veterinary Medicine supply in Northern Ireland, dated [26 November 2025](#)

67 British Veterinary Association, [Open letter to Baroness Hayman](#), 25 November 2025

68 The Veterinary Medicines Health Situation Scheme (from 1 January 2026) allows, by exception, expedited use of suitable alternative products from outside Northern Ireland when required for animal or public health, lasting only as long as the justification persists; alongside it, the Veterinary Medicines Internal Market Scheme permits vets to use nonauthorised medicines to prevent unacceptable suffering where no authorised option exists, subject to limited exceptions (e.g., vaccines) and a 12month review.

be identified early so they could be addressed promptly.<sup>69</sup> While veterinary medicines are outside the scope of the SPS negotiations between UK and the EU, there have been calls to either expand the scope to include them<sup>70</sup> or to negotiate a dedicated veterinary medicines agreement.<sup>71</sup> Baroness Hayman confirmed that there were ongoing discussions with the EU on pursuing separate veterinary medicines agreement as part of the ongoing UK-EU reset.<sup>72</sup>

59.

**CONCLUSION**

We will continue to monitor access to veterinary medicines in Northern Ireland and scrutinise the effectiveness of both the Veterinary Medicines Internal Market Scheme and the Veterinary Medicines Health Situations Scheme.

60.

**RECOMMENDATION**

The Government should actively pursue a Veterinary Medicines Agreement with the EU in tandem with the SPS agreement to facilitate smoother trade between Northern Ireland and Great Britain. In its response to this report, the Government should set out its priorities and timeline for such an agreement.

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69 [Qq558–560](#)

70 National Farmers Union (NFU) ([APH0152](#)); Dogs Trust ([APH0219](#))

71 National Office of Animal Health ([APH0194](#))

72 [Q561](#)



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## 4 Biosecurity at the border

61. While a common SPS area would offer clear benefits in reducing existing barriers to agrifood trade, stakeholders held mixed views on whether lowering such barriers with the EU could compromise the UK's biosecurity.<sup>73</sup> The Common Understanding states that the UK "should be able to take targeted action to protect its biosecurity and public health, in the same way as Member States ..."<sup>74</sup> and stakeholders have stressed the need for the UK to maintain safeguards and retain the ability to impose protective measures when necessary.<sup>75</sup>
62. Under the UK's current border biosecurity regime, the Border Target Operating Model (BTOM),<sup>76</sup> inspection rates are determined by Defra based on the risk categorisation of goods by country and commodity.<sup>77</sup> Examples of the BTOM in action have been seen recently in response to outbreaks of Foot and Mouth Disease (FMD) and African Swine Fever on the continent. Our work following the FMD outbreak in Germany found that the Government's biosecurity measures had not worked properly,<sup>78</sup> i.e. taking six days to update the digital system IPAFFS<sup>79</sup> with the necessary commodity codes and risking prohibited products entering the country automatically. Our recommendations on pre-compiling commodity codes for the most high risk products and ensuring staff availability around the clock, were welcomed and in the main implemented.<sup>80</sup> The BTOM later passed a further stress test in November 2025 following the detection of African Swine Fever (ASF) virus in Spain.<sup>81</sup> Baroness Hayman, Minister for Biosecurity, confirmed that

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73 National Farmers' Union ([APH0259](#)); Woodland Trust ([APH0192](#)); Dover Port Health Authority ([APH0227](#))

74 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

75 National Farmers' Union ([APH0259](#)); VIBRANT BRANDS LIMITED ([APH0190](#)); Getlink ([APH0260](#)); Evile & Jones Group Limited ([APH0174](#))

76 The Border Target Operating Model is the UK Government's post-Brexit riskbased system for import controls, including new sanitary and phytosanitary requirements and simplified safety and security processes, for all goods entering Great Britain

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

78 Environment, Food and Rural Affairs Committee, Fourth Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy \(Government Response\)](#), HC1496, 19 November 2025

79 Import of products, animals, food and feed system (IPAFFS)

80 Environment, Food and Rural Affairs Committee, Fourth Special Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy](#), HC1927, 15 September 2025

81 Reuters, [Eight more suspected swine fever cases](#), 30 November 2025

lessons from the FMD incident had been learned and that, within a day on this occasion, IPAFFS had been updated, affected products were seized at the border, and all without resourcing challenges.<sup>82</sup>

63. We have heard concerns that the UK might move away from the scientific, risk-based approach to border checks set out under the BTOM in a future UK-EU SPS agreement.<sup>83</sup> The London Port Health Authority has requested that the Government seek mutual recognition, risk-based, safeguards rather than accept a reversion to blanket (and potentially outdated) EU border policy.

64. **CONCLUSION**

The UK's Border Target Operating Model (BTOM) provides a risk-based framework for managing biosecurity threats at the UK border. Our scrutiny and Government action has contributed to tangible improvements in responsiveness, as demonstrated by the swift and effective action taken following the detection of African Swine Fever in Spain, contrasting with the delays experienced during the earlier Foot and Mouth outbreak in Germany. These developments underscore the importance of retaining BTOM's risk-based principles as the basis for action and ensuring systems and resources remain in place to deliver rapid, proportionate responses to emerging threats.

## Plant biosecurity

65. Some representing voices in the horticultural sector have raised concerns over plant biosecurity if border checks are reduced following an SPS agreement. Risks arise given the prevalence of certain diseases in continental Europe that are not normally present in the UK and that have been forestalled by Britain's checks and geography until now.<sup>84</sup> The bacterial disease *Xylella*,<sup>85</sup> for example, has not been detected in the UK but there have been numerous outbreaks in European countries<sup>86</sup> and restrictions have been placed on importing certain plants from the EU in response.<sup>87</sup>

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82 [Q457](#)

83 City of London Corporation - London Port Health Authority ([APH0233](#)); Fresh Produce Consortium ([APH0244](#))

84 Royal Botanic Gardens, Kew ([APH0206](#)); Royal Horticultural Society ([APH0237](#)) Woodland Trust ([APH0192](#))

85 *Xylella* species and subspecies (*Xylella fastidiosa*) is bacterial disease affecting hundreds of plant species such as olives, lavender, rosemary and oak ; spread by leafhoppers, it has caused severe losses in southern Europe and would be catastrophic if introduced to the UK.

86 The European Commission, [Latest Developments of Xylella fastidiosa in the EU territory](#), accessed 19 January 2026

87 Defra, [Xylella Host Risk Levels](#), accessed 19 January 2025; Gov.uk, [Importing plants that could host Xylella fastidiosa, canker stain of plane and elm yellows](#), 21 May 2020

The Royal Horticultural Society voiced its apprehension that these would presumably be removed under dynamic alignment, which would be “a retrograde step for UK biosecurity.”<sup>88</sup> The UK Chief Plant Health Officer, Professor Nicola Spence, however, told us that the UK has “... invested many millions in research and preparedness around [Xylella]. As part of the negotiations, we would be seeking to make sure that we have sufficient controls and an evidence-based approach around any imports.”<sup>89</sup>

66. The Royal Botanical Gardens, Kew, has said that untargeted action is also required to maintain plant biosecurity. It highlighted that there are 1432 pests and disease on the Plant Health Risk register that threaten the UK and that targeted action is impossible for each of these, so any border biosecurity regime should reduce universal risk.<sup>90</sup> Professor Spence noted that access to European databases and intelligence-sharing within a common SPS area would help prevent pests and diseases from entering Britain, but also assured us that inland surveillance would remain in place.<sup>91</sup> The Woodland Trust warned, however, that the reduction of border checks means that Britain risks losing a key source of intelligence for monitoring plant pests and diseases: live data from such checks.<sup>92</sup>

67. **CONCLUSION**

Maintaining Great Britain’s biosecurity is vital. Britain’s geography provides natural protection from many plant and animal health threats. Any future SPS agreement will require adjustments to existing border controls, but it remains essential that GB retains the ability to apply robust, evidence-based measures to prevent the introduction of diseases from Europe.

68. **RECOMMENDATION**

The Government must ensure that Great Britain is able to maintain risk-based controls to protect against serious plant and animal disease threats. This includes the continuation of robust import controls on plants that can host the bacterial disease caused by *Xylella* species and subspecies.

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88 Royal Horticultural Society ([APH0237](#))

89 [Q488](#)

90 Royal Botanic Gardens, Kew ([APH0206](#)),

91 [Q490](#)

92 Woodland Trust ([APH0192](#))

## Britain's illegal meat crisis

69. We have previously reported on both the importing of illegal meat into the UK and the UK's commercial border strategy.<sup>93</sup> The Government's replies to both reports continued to conflate illegal and legal imports despite our conclusions and recommendations putting much weight on the importance of distinguishing them.<sup>94</sup> We pressed Baroness Hayman, Minister for Biosecurity, on this issue while taking evidence for this report. For example, the Government said that it would delay a work program to tackle domestic demand for importing illegal meat until after an SPS deal had been negotiated.<sup>95</sup> The Minister assured the Committee that a closer working relationship with EU intelligence agencies "should help in reducing the amount of illegal meat actually reaching our borders."<sup>96</sup>
70. However, it remains unclear how an SPS deal will deter those already engaged in bringing illegal meat into the UK. The Minister acknowledged that some vans intercepted at Dover originated from outside the EU, including countries such as Ukraine and Moldova.<sup>97</sup> She further conceded that there does not appear to be any active EU measures to stop the illegal meat trade.<sup>98</sup> Whilst the Minister assured us that "the EU will also want to be very secure that our borders are secure,"<sup>99</sup> the veterinary inspection provider Eville & Jones Group emphasised that Britain's island status places it at a lower risk of plant and animal disease outbreaks than continental Europe. As a result, they argued that EU exposure to risk from UK trade is minimal, whereas the UK is more vulnerable to risks such as illegal meat entering from the EU.<sup>100</sup>
71. Our report, *Biosecurity at the border: Britain's illegal meat crisis*, also recommended a more coordinated crossagency approach to tackling the organisational, locationbased and demand drivers that contribute to continued illegal meat imports.<sup>101</sup> In response, Baroness Hayman said she was planning on reestablishing the ministerial working group on borders,

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93 Environment, Food and Rural Affairs Committee, Third Report of the Session 2024–26, [Biosecurity at the border: Britain's illegal meat crisis](#), HC1926, 8 September 2025; Environment, Food and Rural Affairs Committee, Fourth Special Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy](#), HC1927, 15 September 2025

94 [Q466](#)

95 Environment, Food and Rural Affairs Committee, [Biosecurity at the border: Britain's illegal meat crisis: Government Response](#), Third Special Report of Session 2024–26, HC1490, 11 November 2025

96 [Q467](#)

97 [Q481](#)

98 [Q473](#)

99 [Q469](#)

100 Eville & Jones Group Limited ([APH0174](#))

101 Environment, Food and Rural Affairs Committee, Third Report of the Session 2024–26, [Biosecurity at the border: Britain's illegal meat crisis](#), HC1926, 8 September 2025

made up of Defra, Home Office, Department for Transport, Cabinet Office and HM Treasury, which had only one meeting before the ministerial reshuffle in September 2025.<sup>102</sup>

72.

**CONCLUSION**

Both the EU and the UK are exposed to biosecurity risks from illegal meat imports. Although future access to EU data systems and intelligence within a common SPS area could support British border enforcement efforts, there is nothing within an SPS agreement to actively prevent or deter criminal activity linked to the trade of illegal meat.

73.

**RECOMMENDATION**

Defra must not wait until SPS negotiations are concluded before developing a strategy to reduce demand for illegally imported animal products. We reiterate the recommendation made in our previous report on this topic that the Government, by June 2026, should begin work with the FSA, FSS and local authorities to develop a strategy to tackle the domestic demand for imported illegal meat. This strategy should include engagement with Eastern European and other at-risk communities in Great Britain to raise awareness of animal disease risks and the importance of control measures.

74.

**CONCLUSION**

We welcome the Minister's commitment to reestablish the cross-ministerial working group on borders, recognising the importance of coordinated oversight of biosecurity risks and border operations.

75.

**RECOMMENDATION**

In its response to this report, the Government should provide details on how many times the group has met since September 2025 and share minutes of its discussions. Defra should expand the ministerial working group to include an additional operational group comprising of frontline agencies operating at the border, such as the Chief Veterinary Officer, the Animal and Plant Health Agency, Food Standards Scotland and the Food Standards Agency.

## Personal Imports

76. In April 2025, the Government introduced a ban on the import of most animal products from the EU. In correspondence with us in June 2025, the Minister said that “we are dependent on the travel sector's goodwill” to communicate these rules with travellers as they are not legally obligated to

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102 [Q477](#)

make their customers aware of personal import rules for the EU in the same way that they are for non-EU countries.<sup>103</sup> The Government has deferred the application of these rules for EU travel operators as part of the post-EU Exit transitional arrangements until 31 January 2027.<sup>104</sup> Through first-hand experience and written and oral evidence, we have concluded that there is a lack of public awareness of the restrictions on personal imports from the EU.<sup>105</sup> However, in its response to our report on illegal meat, the department said that Defra’s quarterly attitude tracker results in August 2025 indicated that over 90% of those who had travelled to the EU since April 2025 were aware of the rules.<sup>106</sup> Following our correspondence with the department seeking clarification on the methodology of this survey, this conclusion was revised by Defra with the new figures showing that 12% respondents thought they could bring back meat and/or dairy products from Europe and 6% responded ‘don’t know’.<sup>107</sup> Baroness Hayman also acknowledged there were challenges in measuring public awareness of personal import rules using the attitudes tracker and committed to improving how the department measures this awareness and to include data on the socio-economic background of respondents.<sup>108</sup>

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103 Correspondence from the Baroness Hayman of Ullock, Parliamentary Under-Secretary of State at Defra, [6 June 2025](#).

104 Environment, Food and Rural Affairs Committee, [Biosecurity at the border: Britain’s illegal meat crisis: Government Response](#), Third Special Report of Session 2024–26, HC1490, 11 November 2025

105 Environment, Food and Rural Affairs Committee, Third Report of the Session 2024–26, [Biosecurity at the border: Britain’s illegal meat crisis](#), HC1926, 8 September 2025

106 Environment, Food and Rural Affairs Committee, [Biosecurity at the border: Britain’s illegal meat crisis: Government Response](#), Third Special Report of Session 2024–26, HC1490, 11 November 2025

107 Correspondence from Baroness Hayman, Minister for Biosecurity, Borders and Animals, re Defra’s attitude tracker and its insight into awareness of rules for personal imports of meat and dairy products, [dated 19 January 2026](#); Correspondence from Baroness Hayman, Minister for Biosecurity, Borders and Animals, regarding Defra’s attitude tracker and the predicted timelines for Veterinary Surgeons Act reform (following evidence session on 9 December), [dated January 2026](#)

108 Correspondence from Baroness Hayman, Minister for Biosecurity, Borders and Animals, regarding Defra’s attitude tracker and the predicted timelines for Veterinary Surgeons Act reform (following evidence session on 9 December), [dated January 2026](#)

**77.**

**CONCLUSION**

Relying on the goodwill of EU travel operators to communicate personal import rules is not an acceptable approach. Defra has acknowledged that its current survey methods make it difficult to assess public awareness of personal import restrictions, and it has subsequently revised down its own estimates after we raised concerns about the methodology used in its quarterly attitude tracker. Nevertheless, even the updated figure of 81% traveller awareness—reduced from the original figure of over 90%—still appears high and does not align with the Committee’s experience.

**78.**

**RECOMMENDATION**

Regardless of SPS negotiation timings, the Government must not delay the implementation of the requirement for EU transport operators to draw travellers’ attention to UK rules on personal imports of products of animal origin beyond 31 January 2027.

**79.**

**RECOMMENDATION**

Given the reliance on public awareness for compliance with rules for personal imports from the EU, the Government should ensure its measure of this is as reliable as possible. In response to this report the Government should provide us with its revised methodology and survey plan for measuring public awareness of personal import rules, to ensure the approach is transparent, robust, and is capable of providing more accurate assessments.

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## 5 Border Infrastructure

### Rest of World imports

- 80.** The UK’s decision to leave the EU customs union and single market meant that the UK applies import controls on goods arriving in Great Britain from the EU in the same way as it does on goods arriving from the rest of the world. As such the Government applies the “global risk-based approach”, as set out under the Border Target Operating Model (BTOM) to apply the required checks proportionate to the risk level.<sup>109</sup> As part of the phased implementation of the BTOM, from 30 April 2024, the requirement of Export Health Certification and routine checks on low-risk animal products, plants, plant products from the Rest of World (RoW) were removed. This, together with targeting inspections using UK-specific scientific evidence, has worked to improve efficiency for RoW trade.<sup>110</sup>
- 81.** “Third country” status with the EU requires the UK to undergo full EU customs and border controls on agri-food exports, including documentary and physical checks. The easing of these barriers is a key benefit of the UK-EU SPS deal for the agri-food sector and wider UK economy.
- 82.** Whilst the details of the common SPS area are still subject to negotiation, there are concerns that the UK may be required to impose EU ‘third country’ procedures on RoW imports, as is the case with the Swiss-EU SPS agreement.<sup>111</sup> This would result in the removal of the risk-based approach to inspections implemented under the BTOM.<sup>112</sup> These stricter RoW controls could disproportionately affect certain sectors; 72% of fruit imports are sourced from outside of the EU.<sup>113</sup>
- 83.** The Fresh Produce Consortium highlighted potential pressure on deep seaport inspection facilities if EU-standard checks return.<sup>114</sup> Mark Thompson, head of Defra’s Northern Ireland, Biosecurity, and Trade Programme, noted

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

110 International Meat Trade Association ([APH0201](#))

111 Centre for Inclusive Trade, [An EU-UK SPS Agreement: The perils and possibilities of \(re\)alignment](#), 3 December 2024

112 International Meat Trade Association ([APH0201](#)) [APH0201 - International Meat Trade Association](#)

113 Food Standards Agency, [Our Food 2022: Going Global](#), 8 November 2023; Fresh Produce Consortium ([APH0244](#))

114 Fresh Produce Consortium ([APH0244](#))



that the impact would vary by port: EU traffic mainly uses south-east ports, while most non-EU goods enter through east and west coast ports, many of which are already equipped for such checks. He explained that staffing adjustments and training would be required, and the department would “want” to allow 12–18 months for these changes.<sup>115</sup>

**84. CONCLUSION**

A common UK-EU SPS area is expected to reduce administrative burdens, costs, and resource pressures at the Short Straits. However, adopting EU-style “third country” controls on Rest of World imports risks increasing checks, costs, and delays, particularly in sectors reliant on nonEU suppliers, such as fruit.

**85. RECOMMENDATION**

Following an SPS agreement with the EU, the Government should set out an assessment of the agreement on Rest of World (RoW) supply chains. This should include identifying opportunities to redeploy existing infrastructure and staff and maintaining a proportionate riskbased approach wherever possible. The Government should provide affected RoW border facilities and traders with a minimum of 12 months to implement the required changes before they come into force.

## Redundant border infrastructure

- 86.** Our report on commercial imports found 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.<sup>116</sup> For example, Portsmouth International Port was required to build a purpose built Border Control Post (BCP) at a cost of £23m, £6m of which was funded by the city council. The leader of Portsmouth City Council, Steve Pitt, said the local authority had hoped to recoup some of the costs of the council-owned facility through charging for goods to be inspected but that, “If the border control post is no longer in use we will be looking for compensation from government to recover the shortfall,”<sup>117</sup> Whilst she was unable to go into more detail on compensation, Defra Minister Baroness Hayman confirmed that she had met with port health and local authorities and was in talks with the Treasury on how to resolve their concerns.<sup>118</sup>

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115 [Q499](#)

116 Environment, Food and Rural Affairs Committee, Fourth Special Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy](#), HC1927, 15 September 2025

117 BBC News, [City’s £23m border control post may need to be demolished](#), 21 May 2025

118 [Qq500–502](#)

**87. CONCLUSION**

Local authorities and businesses have invested heavily, at the Government's instruction, in border infrastructure that may become redundant under a new SPS regime. A lack of clarity from HM Treasury regarding compensation has had a negative impact on relationships between local authorities and Government.

**88. RECOMMENDATION**

The Government should set out how it will learn lessons from the implementation of the Border Target Operating Model (BTOM), including the handling of costs for unused or underused border infrastructure. It should publish its position on compensation for local authorities and businesses and state how it will ensure future border policy changes avoid generating unnecessary or stranded investments.

**89.** Following our previous recommendations, Defra have committed to explore options for repurposing space at Bastion Point BCP and share that cost-benefit analysis at the Bastion Site with us.<sup>119</sup> Given the anticipated reduction in border checks for goods travelling via the Short Straits, both Bastion Point and Sevington BCP are likely to require repurposing.

**90.** The Government has stated that it cannot commit to the long-term future of Sevington BCP while negotiations with the EU are ongoing.<sup>120</sup> However, in December 2025, Ashford Borough Council approved plans to make the facility's infrastructure permanent.<sup>121</sup>

**91. CONCLUSION**

We expect that, together with Bastion Point, Sevington BCP will need to be repurposed following the anticipated reduction in border checks for EU goods once a common SPS area is established.

**92. RECOMMENDATION**

In addition to the cost-benefit analysis of repurposing Bastion Point BCP already committed to us, the Government should also provide its plans, with an associated cost analysis, for Sevington BCP following the establishment of a common SPS area, no later than three months after negotiations with the EU are completed.

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119 Environment, Food and Rural Affairs Committee, [Biosecurity at the border: Britain's illegal meat crisis: Government Response](#), Third Special Report of Session 2024–26, HC1490, 11 November 2025

120 Environment, Food and Rural Affairs Committee, Fourth Report of the Session 2024–26, [UK-EU trade: towards a resilient border strategy \(Government Response\)](#), HC 1496, 19 November 2025

121 Gov.UK, [Sevington Inland Border Facility Crown development application given approval](#), 17 December 2025

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## 6 Resourcing and oversight

93. We heard evidence that Defra and relevant bodies may face significant challenges around resourcing, costs, and capacity in delivering the regulatory changes required to establish and maintain a common SPS area with the EU by the target of mid-2027.<sup>122</sup> Both the FSA and FSS stressed during oral evidence that work on potential dynamic alignment with the EU is highly resource-intensive and will remain so for years to come.<sup>123</sup> While the exact number of legislative instruments within scope of the SPS agreement remains unclear, the FSA expects to be involved in approximately 80 of the estimated 300 pieces of legislation.<sup>124</sup>
94. Both agencies operate on a flat budget settlement from the UK and Scottish governments and confirmed they have not received additional funding for this work.<sup>125</sup> Katie Pettifer, Chief Executive of the FSA, explained that it has had to deploy surge tactics allocating extra responsibilities to “... people to work on it without any change in the day job, and without any extra resource,” forcing difficult prioritisation decisions.<sup>126</sup> Whilst the FSA has received additional flexibility from HM Treasury to redirect staff and resources towards SPS work, it did not consider this sufficient and said it would need to “slow or stop work in other areas.”<sup>127</sup> Separately, the farming Minister, Dame Angela Eagle MP, confirmed that work on SPS agreement was affecting the ongoing trials for a cattle vaccine against bovine Tuberculosis due to “capacity issue in the department and not an issue of negotiation with the EU.”<sup>128</sup>

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122 [Q374](#); [Q580](#)

123 [Q374](#); [Qq379–382](#)

124 [Q381](#)

125 Correspondence from the Food Standards Agency and Food Standards Scotland following evidence session on 21 October 2025, [dated 9 December 2025](#)

126 [Q381](#)

127 Correspondence from the Food Standards Agency and Food Standards Scotland following evidence session on 21 October 2025, [dated 9 December 2025](#)

128 [Q580](#)

**95. CONCLUSION**

There is uncertainty regarding the Government's resource capacity to deliver the extensive regulatory changes required to establish a common SPS area with the EU by the ambitious June 2027 deadline. This work is a substantial legislative and operational undertaking, which must be achieved while simultaneously fulfilling commitments under major policy plans and strategies. Without clear prioritisation, resourcing plans, and a transparent roadmap, there is a considerable risk of delays, regulatory inertia, or compromised policy and outcomes.

**96. RECOMMENDATION**

The Government should find, allocate and disclose budgets and plans for increasing staffing, expertise, and funding to support its work on the SPS agreement and ensure timely delivery alongside other policy commitments. HM Treasury must increase the FSA's flat budget settlement to reflect the additional operational demands being placed on the agency. The UK Government should also have discussions with the Scottish Government to ensure additional funds are allocated to Food Standards Scotland so it can meet the extra resource requirements associated with SPS implementation.

## The role of Parliament

- 97.** Committees in both Houses have been scrutinising the Government's proposals for the ongoing UK-EU reset and concerns have been raised about Parliament's role in scrutinising European legislation, and capacity within UK institutions. For example, the House of Lords European Affairs Committee asked whether the Government plans to increase financial and personnel resources in the Cabinet Office and UK Mission to the EU to match the heightened level of engagement.<sup>129</sup>
- 98.** Parliamentary scrutiny remains a critical issue. The Common Understanding states that dynamic alignment will be applied "giving due regard to the United Kingdom's constitutional and parliamentary procedures."<sup>130</sup> Scrutiny can take many forms, including through select committees. With the disbandment of the House of Commons European Scrutiny Committee in 2024, "EU schemes, laws and proposals that could have an impact on the UK will now fall under the remit of the relevant departmental or other committees."<sup>131</sup>

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129 HOUSE OF LORDS, European Affairs Committee, Unfinished Business: Resetting the UK-EU relationship, 1st Report of Session 2024–26, [HL Paper 202](#), 12 November 2025

130 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

131 UK Parliament, Committees, [European Scrutiny Committee discontinued](#), 1 August 2024

99. Despite repeated requests to the Cabinet Office, the Minister for the Constitution and European Union Relations, Nick Thomas-Symonds MP, was “content to decline”<sup>132</sup> our invitation to give evidence. While the Cabinet Office assured us that written briefing would be provided to the Defra Minister Baroness Hayman, she explained that she had not received detailed information from the Cabinet Office and could only address questions directly related to Defra.<sup>133</sup> Baroness Hayman noted that negotiations were at an early stage and suggested that any broader questions should be directed to the responsible Minister to avoid providing inaccurate information.<sup>134</sup>
100. Beyond scrutiny, we recognise our role, and the role of the wider parliamentary community, in maintaining engagement with EU counterparts, rebuilding relationships, and continuing open dialogue. Our recent visit to Brussels demonstrated a clear appetite for Member-level engagement to understand priorities and concerns on both sides.<sup>135</sup>
101. **CONCLUSION**  
We believe that our remit and responsibilities make this Committee the most appropriate body for scrutiny of SPS policy. We are therefore disappointed that the Minister for the Constitution and European Union Relations refused to appear before us. We echo the House of Lords recommendation that: “The Government should set out how it envisages that a scrutiny system for dynamic alignment would work and how it plans to ensure that Parliament can play a full scrutiny role in this new area of activity.”
102. **RECOMMENDATION**  
The Government should publish detailed plans for parliamentary scrutiny of the SPS agreement and any future EU legislation that would be assimilated into GB law once within a common SPS area.
103. The Swiss and Norwegian models offer useful precedents for managing exemptions, implementation timelines, and incorporation of EU legislation into domestic law. Polling organisation, Best for Britain, has produced results suggesting that the British electorate are supportive of dynamic regulatory alignment with the EU in exchange for the improvement in trade that an SPS deal will bring.<sup>136</sup> However, dynamic alignment poses significant political challenges for third countries, particularly in securing domestic

132 Correspondence to the Chair of the Public Administration and Constitutional Affairs Committee relating to the work of the Cabinet Office, [dated 8 January 2026](#)

133 [Q452](#)

134 [Q452](#)

135 Environment, Food and Rural Affairs Committee ([APH0265](#))

136 Best for Britain ([APH0195](#))

consent and managing perceptions of sovereignty.<sup>137</sup> As mentioned above, third country representatives are permitted early-stage engagement with the European Union’s legislative process, but are not permitted to make amendments to proposals or vote on their adoption.

- 104.** As part of the EU-Switzerland Common Food Safety Area Protocol (equivalent to an SPS agreement), Switzerland will be required to temporarily apply all non-legislative legal acts, such as delegated and implementing acts, from the day they become applicable in the Union, until the EU-Swiss Joint Committee decides to formally integrate those acts into the Protocol and they become law in Switzerland.<sup>138</sup> It is not yet known how exactly the UK-EU SPS agreement will give “due regard to the United Kingdom’s constitutional and parliamentary procedures.”<sup>139</sup>

**105. CONCLUSION**

While the Government has been vocal in advocating for an SPS deal and highlighting its benefits for farmers, traders, and the wider UK economy, the realities and implications of dynamic alignment have not been well explained to the public. There is a need for fuller debate on both the benefits and challenges of this system, including its long term implications for sovereignty and democratic processes.

**106. RECOMMENDATION**

The Government should set out in its response to this report how it intends to communicate the realities of dynamic alignment—not only to affected businesses, farmers, producers, and industry stakeholders, but also to the wider public—explaining the benefits and challenges and how this approach interacts with the UK’s democratic processes.

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137 Environment, Food and Rural Affairs Committee ([APH0265](#))

138 European Commission, [Agreement on trade in agricultural products and Protocol establishing the Common Food Safety Area](#), accessed 16 January 2026

139 Cabinet Office, [UK-EU Summit - Common Understanding](#), updated 22 December 2025

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# Conclusions and recommendations

## Aligning SPS policy

1. The Government must urgently clarify whether on-farm animal welfare and labelling will be included in negotiations with the EU of an SPS agreement so it can properly develop any future legislative changes, prepare industry for reforms and so those changes can be properly scrutinised. (Conclusion, Paragraph 15)
2. The Government and EU should establish the scope of the SPS negotiations as a priority and publish this information on an interim basis, prior to the conclusion of negotiations, to enable effective consultation and scrutiny. (Recommendation, Paragraph 16)
3. The Government must not allow UK farmers and food producers to be undercut by cheaper imports produced to lower welfare standards, in line with its repeated commitments to not lower food standards and uphold high animal welfare standards in trade agreements. This risk is heightened by the proposals to raise on-farm welfare standards set out in the Animal Welfare Strategy, which will affect producers regardless of whether on-farm welfare ultimately falls within the scope of the SPS negotiations. A Swiss-style animal welfare carve out exemption for the UK would preserve the UK's ability to maintain and enhance domestic animal welfare standards within a common SPS area. (Conclusion, Paragraph 19)
4. The UK Government should seek specific exemptions from dynamic alignment with the EU on animal welfare standards. (Recommendation, Paragraph 20)
5. The Government must prevent UK food producers from being undercut by EU imports produced to lower animal welfare standards within a future common SPS area. In its response to this report, the Government should set out the practical measures it will take to protect producers. (Recommendation, Paragraph 21)
6. Legislative divergence between the UK and EU has occurred given the EU no longer considers GB-specific scientific evidence, such as climatic conditions relevant to mycotoxin formation or the agronomic need for certain plant

protection products (PPPs). As such, full adoption of EU rules in this area would risk embedding regulatory decisions that are inappropriate for GB production systems. (Conclusion, Paragraph 27)

7. The Government should ensure in negotiations that GB will only adopt new EU regulations on PPPs and mycotoxin limits where GB climate, growing conditions and scientific data have been fully considered in their development. It should seek assurances, as a core requirement of any SPS framework, that GB scientific evidence, including agronomic and climatic data, will be incorporated into all new science based decisions affecting UK agriculture. (Recommendation, Paragraph 28)
8. The EU's forthcoming new genomic technology (NGT) framework could take several years to be finalised, and waiting for alignment between the EU and UK on precision breeding would undermine England's first-mover advantage and stall the development and release of PBOs. (Conclusion, Paragraph 33)
9. The Government should continue implementing England's Precision Breeding Act, actively progress regulatory procedures to bring precision bred plants to market, and seek a targeted exemption for precision breeding in negotiations with the EU on the SPS agreement. (Recommendation, Paragraph 34)

## Implementation timeline

10. It is essential that sectors are given sufficient time to adapt to regulatory changes introduced by an SPS agreement. This ensures compliance without causing unnecessary disruption and reflects timeframes afforded to EU member states. (Conclusion, Paragraph 39)
11. The Government should secure an implementation period of at least 24 months for sectors to make necessary adjustments resulting from the SPS agreement. Once a common SPS area is established all legislative changes adopted under dynamic alignment must include a mechanism to manage transitions similar to that afforded to EU Member states. (Recommendation, Paragraph 40)
12. Frequent border policy changes over recent years have created disruption, uncertainty and financial pressure for port health and local authorities. Stakeholders are clear that another shift in border regimes will only be manageable if timelines are realistic, communicated early, and not subject to repeated revisions or delays. (Conclusion, Paragraph 41)



13. The Government should provide a clear, realistic transition timetable for moving to a common SPS area, published with key milestones at least 12–24 months in advance. This must not be subject to repeated changes, and implementation plans should be developed with businesses, industry, port health and local authorities. (Recommendation, Paragraph 42)
14. The Government and EU leadership broadly support reaching an SPS agreement, and it is currently feasible that the June 2027 ambition can be met. However, the Government must consider what will happen if negotiations take longer or ultimately fail, ensuring that day-to-day functions such as biosecurity, border operations, and regulatory oversight continue uninterrupted. While some degree of regulatory inertia is inevitable, it must be kept to a minimum. (Conclusion, Paragraph 45)
15. The Government should set out, in response to this report, its contingency plans for the SPS negotiations, recognising that an SPS agreement is not guaranteed. These should set out how core functions such as biosecurity, border operations, and regulatory oversight will continue if negotiations take longer or fail, and how reprioritisation of resources will be managed to avoid undermining critical work. (Recommendation, Paragraph 46)

## UK-wide approach

16. The Committee did not receive a clear or satisfactory explanation of how the Government intends to address UK internal market issues created by the England only Precision Breeding Act. (Conclusion, Paragraph 51)
17. In response to this report, the Government should provide the Committee with a clear, time bound strategy for addressing market barriers to trade within the UK, including structured engagement with devolved governments and options for mutual recognition, common frameworks or targeted legislative changes to ensure that supply chains can function effectively. (Recommendation, Paragraph 52)
18. SPS negotiations have significant implications for the devolved administrations. While the UK Government leads negotiations, it must take account of the specific needs and priorities of each nation, including regional conditions. Internal market challenges, such as those arising from England’s precision breeding legislation, could be mitigated by a UK–EU SPS agreement, provided alignment and carve-outs are carefully managed. (Conclusion, Paragraph 54)
19. The Government should ensure that the devolved administrations have a formal consultative position in the negotiations, and outline, in response to this report, the meetings and other mechanisms for this. The Government should also consider the UK-EU SPS agreement as an opportunity to

strengthen the UK internal market and hold discussions with counterparts in the devolved administrations on the best way to do so. (Recommendation, Paragraph 55)

- 20.** We will continue to monitor access to veterinary medicines in Northern Ireland and scrutinise the effectiveness of both the Veterinary Medicines Internal Market Scheme and the Veterinary Medicines Health Situations Scheme. (Conclusion, Paragraph 59)
- 21.** The Government should actively pursue a Veterinary Medicines Agreement with the EU in tandem with the SPS agreement to facilitate smoother trade between Northern Ireland and Great Britain. In its response to this report, the Government should set out its priorities and timeline for such an agreement. (Recommendation, Paragraph 60)

## Biosecurity at the border

- 22.** The UK's Border Target Operating Model (BTOM) provides a risk-based framework for managing biosecurity threats at the UK border. Our scrutiny and Government action has contributed to tangible improvements in responsiveness, as demonstrated by the swift and effective action taken following the detection of African Swine Fever in Spain, contrasting with the delays experienced during the earlier Foot and Mouth outbreak in Germany. These developments underscore the importance of retaining BTOM's risk-based principles as the basis for action and ensuring systems and resources remain in place to deliver rapid, proportionate responses to emerging threats. (Conclusion, Paragraph 64)
- 23.** Maintaining Great Britain's biosecurity is vital. Britain's geography provides natural protection from many plant and animal health threats. Any future SPS agreement will require adjustments to existing border controls, but it remains essential that GB retains the ability to apply robust, evidence-based measures to prevent the introduction of diseases from Europe. (Conclusion, Paragraph 67)
- 24.** The Government must ensure that Great Britain is able to maintain risk-based controls to protect against serious plant and animal disease threats. This includes the continuation of robust import controls on plants that can host the bacterial disease caused by *Xylella* species and subspecies. (Recommendation, Paragraph 68)
- 25.** Both the EU and the UK are exposed to biosecurity risks from illegal meat imports. Although future access to EU data systems and intelligence within a common SPS area could support British border enforcement efforts, there is nothing within an SPS agreement to actively prevent or deter criminal activity linked to the trade of illegal meat. (Conclusion, Paragraph 72)

26. Defra must not wait until SPS negotiations are concluded before developing a strategy to reduce demand for illegally imported animal products. We reiterate the recommendation made in our previous report on this topic that the Government, by June 2026, should begin work with the FSA, FSS and local authorities to develop a strategy to tackle the domestic demand for imported illegal meat. This strategy should include engagement with Eastern European and other at-risk communities in Great Britain to raise awareness of animal disease risks and the importance of control measures. (Recommendation, Paragraph 73)
27. We welcome the Minister's commitment to reestablish the cross-ministerial working group on borders, recognising the importance of coordinated oversight of biosecurity risks and border operations. (Conclusion, Paragraph 74)
28. In its response to this report, the Government should provide details on how many times the group has met since September 2025 and share minutes of its discussions. Defra should expand the ministerial working group to include an additional operational group comprising of frontline agencies operating at the border, such as the Chief Veterinary Officer, the Animal and Plant Health Agency, Food Standards Scotland and the Food Standards Agency. (Recommendation, Paragraph 75)
29. Relying on the goodwill of EU travel operators to communicate personal import rules is not an acceptable approach. Defra has acknowledged that its current survey methods make it difficult to assess public awareness of personal import restrictions, and it has subsequently revised down its own estimates after we raised concerns about the methodology used in its quarterly attitude tracker. Nevertheless, even the updated figure of 81% traveller awareness—reduced from the original figure of over 90%—still appears high and does not align with the Committee's experience. (Conclusion, Paragraph 77)
30. Regardless of SPS negotiation timings, the Government must not delay the implementation of the requirement for EU transport operators to draw travellers' attention to UK rules on personal imports of products of animal origin beyond 31 January 2027. (Recommendation, Paragraph 78)
31. Given the reliance on public awareness for compliance with rules for personal imports from the EU, the Government should ensure its measure of this is as reliable as possible. In response to this report the Government should provide us with its revised methodology and survey plan for measuring public awareness of personal import rules, to ensure the approach is transparent, robust, and is capable of providing more accurate assessments. (Recommendation, Paragraph 79)

## Border Infrastructure

32. A common UK-EU SPS area is expected to reduce administrative burdens, costs, and resource pressures at the Short Straits. However, adopting EU-style “third country” controls on Rest of World imports risks increasing checks, costs, and delays, particularly in sectors reliant on non EU suppliers, such as fruit. (Conclusion, Paragraph 84)
33. Following an SPS agreement with the EU, the Government should set out an assessment of the agreement on Rest of World (RoW) supply chains. This should include identifying opportunities to redeploy existing infrastructure and staff and maintaining a proportionate risk based approach wherever possible. The Government should provide affected RoW border facilities and traders with a minimum of 12 months to implement the required changes before they come into force. (Recommendation, Paragraph 85)
34. Local authorities and businesses have invested heavily, at the Government’s instruction, in border infrastructure that may become redundant under a new SPS regime. A lack of clarity from HM Treasury regarding compensation has had a negative impact on relationships between local authorities and Government. (Conclusion, Paragraph 87)
35. The Government should set out how it will learn lessons from the implementation of the Border Target Operating Model (BTOM), including the handling of costs for unused or under used border infrastructure. It should publish its position on compensation for local authorities and businesses and state how it will ensure future border policy changes avoid generating unnecessary or stranded investments. (Recommendation, Paragraph 88)
36. We expect that, together with Bastion Point, Sevington BCP will need to be repurposed following the anticipated reduction in border checks for EU goods once a common SPS area is established. (Conclusion, Paragraph 91)
37. In addition to the cost-benefit analysis of repurposing Bastion Point BCP already committed to us, the Government should also provide its plans, with an associated cost analysis, for Sevington BCP following the establishment of a common SPS area, no later than three months after negotiations with the EU are completed. (Recommendation, Paragraph 92)

## Resourcing and oversight

38. There is uncertainty regarding the Government’s resource capacity to deliver the extensive regulatory changes required to establish a common SPS area with the EU by the ambitious June 2027 deadline. This work is a substantial legislative and operational undertaking, which must be achieved while simultaneously fulfilling commitments under major policy

plans and strategies. Without clear prioritisation, resourcing plans, and a transparent roadmap, there is a considerable risk of delays, regulatory inertia, or compromised policy and outcomes. (Conclusion, Paragraph 95)

39. The Government should find, allocate and disclose budgets and plans for increasing staffing, expertise, and funding to support its work on the SPS agreement and ensure timely delivery alongside other policy commitments. HM Treasury must increase the FSA's flat budget settlement to reflect the additional operational demands being placed on the agency. The UK Government should also have discussions with the Scottish Government to ensure additional funds are allocated to Food Standards Scotland so it can meet the extra resource requirements associated with SPS implementation. (Recommendation, Paragraph 96)
40. We believe that our remit and responsibilities make this Committee the most appropriate body for scrutiny of SPS policy. We are therefore disappointed that the Minister for the Constitution and European Union Relations refused to appear before us. We echo the House of Lords recommendation that: "The Government should set out how it envisages that a scrutiny system for dynamic alignment would work and how it plans to ensure that Parliament can play a full scrutiny role in this new area of activity." (Conclusion, Paragraph 101)
41. The Government should publish detailed plans for parliamentary scrutiny of the SPS agreement and any future EU legislation that would be assimilated into GB law once within a common SPS area. (Recommendation, Paragraph 102)
42. While the Government has been vocal in advocating for an SPS deal and highlighting its benefits for farmers, traders, and the wider UK economy, the realities and implications of dynamic alignment have not been well explained to the public. There is a need for fuller debate on both the benefits and challenges of this system, including its long term implications for sovereignty and democratic processes. (Conclusion, Paragraph 105)
43. The Government should set out in its response to this report how it intends to communicate the realities of dynamic alignment—not only to affected businesses, farmers, producers, and industry stakeholders, but also to the wider public—explaining the benefits and challenges and how this approach interacts with the UK's democratic processes. (Recommendation, Paragraph 106)

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# Formal minutes

**Wednesday 28 January 2026**

## Members present

Mr Alistair Carmichael, in the Chair

Sarah Bool

Charlie Dewhirst

Terry Jermy

Jayne Kirkham

Josh Newbury

Tim Roca

Henry Tufnell

## UK-EU agritrade: making an SPS agreement work

Draft Report (*UK-EU agritrade: making an SPS agreement work*), proposed by the Chair, brought up and read.

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

Paragraphs 1 to 106 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Fifth 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 3 March at 9.30am.

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# Witnesses

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

## Tuesday 21 October 2025

**Katie Pettifer**, Chief Executive, Food Standards Agency (FSA); **Geoff Ogle**, Chief Executive, Food Standards Scotland (FSS) [Q360–450](#)

## Tuesday 9 December 2025

**Baroness Hayman of Ullock**, Parliamentary Under-Secretary of State, Department for Environment, Food and Rural Affairs; **Dr Christine Middlemiss CB**, Chief Veterinary Officer, Department for Environment, Food and Rural Affairs; **Professor Nicola Spence CBE**, The UK Chief Plant Health Officer, Department for Environment, Food and Rural Affairs; **Mark Thompson**, Director, Northern Ireland, Biosecurity, and Trade Programme, Department for Environment, Food and Rural Affairs [Q451–562](#)

## Tuesday 16 December 2025

**Dame Angela Eagle MP**, Minister for Food Security and Rural Affairs, Department for Environment Food and Rural Affairs; **Emily Miles**, Director General for Food, Biosecurity and Trade, Department for Environment, Food and Rural Affairs; **Mike Rowe**, Director for Farming and Countryside, Department for Environment, Food and Rural Affairs [Q563–583](#)

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# 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	<a href="#">APH0208</a>
2	Agricultural Industries Confederation (AIC)	<a href="#">APH0182</a>
3	Agriculture and Horticulture Development Board (AHDB)	<a href="#">APH0263</a>
4	Animal Equality	<a href="#">APH0202</a>
5	Animal Policy International	<a href="#">APH0197</a>
6	Bayer CropScience Ltd	<a href="#">APH0225</a>
7	Best for Britain	<a href="#">APH0195</a>
8	Beyond GM	<a href="#">APH0189</a>
9	Bioindustry Association	<a href="#">APH0205</a>
10	British Coffee Association	<a href="#">APH0262</a>
11	British Equestrian Trade Association Ltd	<a href="#">APH0249</a>
12	British Horse Council	<a href="#">APH0220</a>
13	British Ports Association	<a href="#">APH0170</a>
14	British Poultry Council	<a href="#">APH0240</a>
15	British Retail Consortium	<a href="#">APH0231</a>
16	British Soft Drinks Association	<a href="#">APH0199</a>
17	British Thoroughbred racing and breeding industry representatives	<a href="#">APH0257</a>
18	British Veterinary Association	<a href="#">APH0228</a>
19	British and Irish Association of Zoos and Aquariums	<a href="#">APH0193</a>
20	CIOPORA	<a href="#">APH0191</a>
21	Chartered Institute of Environmental Health; and Association of Port Health Authorities	<a href="#">APH0261</a>
22	Chester Zoo	<a href="#">APH0173</a>
23	City of London Corporation - London Port Health Authority	<a href="#">APH0233</a>



24	Compassion in World Farming	<a href="#">APH0172</a>
25	Confederation of British Industry (CBI)	<a href="#">APH0232</a>
26	Cornwall Council	<a href="#">APH0214</a>
27	Council for Responsible Nutrition	<a href="#">APH0218</a>
28	CropLife UK	<a href="#">APH0236</a>
29	Department for Environment, Food and Rural Affairs	<a href="#">APH0252</a>
30	Dogs Trust	<a href="#">APH0219</a>
31	Dover Port Health Authority	<a href="#">APH0227</a>
32	Dutch Association of Wholesalers in Floricultural Products (VGB)	<a href="#">APH0253</a>
33	Environment, Food and Rural Affairs Committee	<a href="#">APH0267</a>
34	Environment, Food and Rural Affairs Committee	<a href="#">APH0264</a>
35	Environment, Food and Rural Affairs Committee	<a href="#">APH0265</a>
36	Environment, Food and Rural Affairs Committee	<a href="#">APH0266</a>
37	Environment, Food and Rural Affairs Committee	<a href="#">APH0186</a>
38	European Specialist Sports Nutrition Alliance (ESSNA)	<a href="#">APH0229</a>
39	Eville & Jones Group Limited	<a href="#">APH0174</a>
40	FABRA UK	<a href="#">APH0179</a>
41	FOUR PAWS UK	<a href="#">APH0185</a>
42	Farmers' Union of Wales	<a href="#">APH0175</a>
43	Fidra	<a href="#">APH0230</a>
44	Food and Drink Federation	<a href="#">APH0213</a>
45	Freight Liaison Group (FLG)	<a href="#">APH0200</a>
46	Fresh Produce Consortium	<a href="#">APH0244</a>
47	Getlink	<a href="#">APH0260</a>
48	Good Food Institute Europe	<a href="#">APH0188</a>
49	Health Food Manufacturers' Association (HFMA)	<a href="#">APH0171</a>
50	Hop to Save Rabbits	<a href="#">APH0243</a>
51	Horticultural Trades Association	<a href="#">APH0234</a>
52	Humane World for Animals UK	<a href="#">APH0246</a>
53	International Meat Trade Association	<a href="#">APH0201</a>
54	Jeremy Coller Foundation	<a href="#">APH0216</a>
55	Labour Animal Welfare Society	<a href="#">APH0226</a>

56	MSD Animal Health	<a href="#">APH0184</a>
57	Maciel, Dr. Carolina	<a href="#">APH0223</a>
58	Manchester City Council	<a href="#">APH0180</a>
59	Marks and Spencer	<a href="#">APH0255</a>
60	National Farmers Union (NFU) Scotland	<a href="#">APH0198</a>
61	National Farmers' Union	<a href="#">APH0259</a>
62	National Office of Animal Health	<a href="#">APH0194</a>
63	National Pig Association	<a href="#">APH0239</a>
64	Norwich Research Park	<a href="#">APH0196</a>
65	Ornamental Aquatic Trade Association (OATA)	<a href="#">APH0247</a>
66	PAGB, the consumer healthcare association	<a href="#">APH0203</a>
67	PAN UK	<a href="#">APH0245</a>
68	Plant Healthy Limited	<a href="#">APH0235</a>
69	Provision Trade Federation	<a href="#">APH0241</a>
70	RSPCA	<a href="#">APH0181</a>
71	Riley, Stuart	<a href="#">APH0209</a>
72	Royal Botanic Gardens, Kew	<a href="#">APH0206</a>
73	Royal Horticultural Society	<a href="#">APH0237</a>
74	Salmon Scotland	<a href="#">APH0215</a>
75	Scotland Food & Drink	<a href="#">APH0238</a>
76	Scottish Fisherman's Federation	<a href="#">APH0258</a>
77	Seafish	<a href="#">APH0176</a>
78	Seafood Scotland	<a href="#">APH0251</a>
79	Shellfish Association of Great Britain	<a href="#">APH0212</a>
80	Soil Association Certification Ltd	<a href="#">APH0207</a>
81	Suffolk Coastal Port Health Authority	<a href="#">APH0210</a>
82	Syngenta	<a href="#">APH0250</a>
83	The National Federation of Fishermen's Organisations	<a href="#">APH0224</a>
84	The Royal Society of Biology	<a href="#">APH0178</a>
85	The Wine and Spirit Trade Association (WSTA)	<a href="#">APH0248</a>
86	Torbay Council	<a href="#">APH0217</a>
87	UK Food Supplements Alliance	<a href="#">APH0211</a>

88	UK Seafood Federation (UKSF)	<a href="#"><u>APH0242</u></a>
89	Union Fleurs - International Flower Trade Association	<a href="#"><u>APH0254</u></a>
90	Vibrant Brands Limited	<a href="#"><u>APH0190</u></a>
91	Welsh Government	<a href="#"><u>APH0221</u></a>
92	Wildlife and Countryside Link	<a href="#"><u>APH0204</u></a>
93	Woodland Trust	<a href="#"><u>APH0192</u></a>
94	World Horse Welfare	<a href="#"><u>APH0222</u></a>

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# 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
4th	UK-EU trade: towards a resilient border strategy	HC 1279
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
4th Special	UK-EU trade: towards a resilient border strategy (Government Response)	HC 1496
3rd Special	Biosecurity at the border: Britain's illegal meat crisis: Government Response	HC 1490
2nd Special	The Government's vision for farming: Government Response	HC 1255
1st Special	Pet welfare and abuse: Government response	HC 581