



Baroness Hayman of Ullock
Parliamentary Under-Secretary of State
Department for Environment, Food and Rural Affairs
Fourth Floor
Seacole Building
2 Marsham Street
London SW1P 4DF

Thursday 17th October 2024

Dear Baroness Hayman,

We write jointly as the Fresh Produce Consortium (FPC) and Horticultural Trades Association (HTA) following our roundtable meeting on plants, cut flowers and the border on 4th October 2024.

At that meeting you sought representations on solutions for the challenges and risks the UK's border policy is presenting to our sectors. As we set out, the trade in both edibles—like fresh fruits and vegetables—and non-edible plants—including cut flowers, planting materials, finished plants, trees, shrubs, bulbs, and seeds—faces significant challenges. Rising logistics costs, damaged goods, delays, increased waste, and cumbersome paperwork have hindered our ability to invest in growth. This situation has led to reduced consumer choice, strained business relationships, a tarnished UK business reputation, diminished confidence in border processes, compromised food security, and setbacks in achieving our environmental targets.

Both our organisations have made extensive detailed representations, including of evidence of the impacts of implementing the BTOM. **We welcome the conversation we have started with you and stress the urgency for action now. The UK must reset and review its current and future border policy.**

Our associations cover different sectors, with different impacts, however, we share the same ambition and stress that the border must work for everyone and in all aspects of trade policy to be truly effective and as frictionless as possible. At the roundtable meeting we mentioned this, and the need for understanding and oversight of all trade-related policies, whether trade with Northern Ireland, GB Plant Passport changes, CITES or other. Unless all aspects function effectively, we have friction and cost, and damage to UK competitiveness, restricted growth and directly impacted consumers. On 20 September the HTA wrote to ask for a meeting with yourself and its members, and **we seek an urgent meeting so you can hear directly from both HTA and FPC members on how they are impacted and what solutions are needed.**

We set out some asks and solutions below, and would be pleased as the FPC and HTA to further explain and evidence.



10 specific border related actions

1. Urgent border policy summit with cross-government ministerial engagement, to hear directly from businesses and establish as swift and solutions focused action programme.
2. Urgently ensure there is ownership and oversight within government of the full suite of border and trade related policies impacting UK horticulture and fresh produce businesses and consumers. We must see growth and economic considerations fully understood when making policy decisions. The reduction in resourcing of the borders team in Defra should be reversed.
3. Deliver the reset of the UK's relationship with the EU. The HTA seeks an SPS/plant health agreement to be achieved based around the principle of mutual recognition, whilst maintaining essential elements of the revised UK Governments border approach.
4. Remove barriers to the current Control Point (CP) system, through provision of inspectors to CPs after 5pm, meet the 4-hour service level agreement at BCPs, expedite roll-out of Authorised Operator Status (AOS or 'trusted trader'), and, given BCPs are not fit-for-purpose in-terms of capability or capacity for handling high-risk plant trade, ensure access to AOS and establishing a POD+ system for those businesses.
5. Review UK commodity risk categorisation further including for current high-risk plant products, cut-flowers, and seeds.
6. Urgent action on communications and trading systems access including broader access to IPAFFS, publication of data on border movements, inspection rates for products, real-time alerts on at-border holds, improved system for UK plant health related alerts,
7. Improve pest and disease testing capability and biosecurity measures at the border, by providing and properly equipped on site laboratories at key BCP and CP locations, improving testing times and proportionality of tests applied, such as seed sample sizes used. Or confirmation of prohibitive pest presence.
8. Confirm now an easement-extension beyond the 30 June 2025 deadline to allow GB Plant Passports to be affixed to retail-ready plants in the EU on behalf of GB Plant Passport holders.
9. Pause the Common-User Charge for 12 months and fully review the economic impacts of UK borders policy.
10. Direct and active international engagement to reassure those involved in global horticulture and fresh produce supply-chains that the UK government is open for trade, business and seeking to improve border operations bot now and give future certainty.

We stress the urgency of action, and are committed to continuing the conversation with this Government and working in partnership on behalf of our members to deliver swift outcomes to address the impact of UK border policy on livelihoods, consumers, and UK growth.

Yours sincerely,


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