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Dear Prime Minister,

April Border Changes & UK Environmental Horticulture

We have just 9 weeks to go until the 30 April Border Target Operating Model (BTOM) changes. From this date we will see high-risk plant checks move to Border Control Posts (BCPs). If these changes come in without any easements then it represents massive risks to the UK's horticultural businesses – one of Britain's green industries. I write to you in the utmost urgency on behalf of UK environmental horticulture requesting your government to act immediately to address the multitude of problems we face with this shift. The consequences present a dramatic risk to the breadth of UK horticulture businesses (the majority of which are SMEs), jobs, biosecurity, environmental target delivery, and to the choice available to the UK's 30 million gardeners. For so many of the businesses that the Horticultural Trades Association (HTA) represents, the clock is ticking. The risks are exacerbated by coming in April, in the middle of the peak season for imports in our sector. I summarise the outstanding issues below:

- **Communication of detail:** there is an extraordinary amount of detail missing on how BCPs will work and operate when handling high-risk plants. We have set these out months, in some cases years, ago. An example is checks on groupage imports – details such as; maximum waiting times for goods, what pre-launch testing has been carried out, the process for driver messaging, how BCPs achieve 100% check- rate targets in the next 12 months and what happens in the event that goods cannot be re-loaded to name some the current unknowns. Without answers and clarity and without any of these processes being able to be properly tested in April, it is unacceptable and irresponsible to proceed as the government intends.
- The **capacity and capability** of BCPs to handle the checking of high-risk plant products is drastically deficient. From lacking the space and equipment to unload mature loads, such as trees, to having just a few curtain-sided checking bays, BCPs are not able to handle the checking of our sector's goods at the volume and speed required for perishable products and to ensure the free flow of imports. The consequences of not getting this right are stark – a bio-security risk or damaging delays to industry.

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- The **costs** of using BCPs is yet to be known. Without the government set Common User Charge being published, at both a cost level and method of applicability (i.e. by phytosanitary consignment), private BCPs will not set out their charges and businesses cannot tell their customers what the costs will be beyond April. Furthermore, those businesses who are in a position to make the huge (£100ks) investment to become a Control Point (CP) cannot do so until they know BCP usage costs. HTA businesses have supplied costs impacts directly to Defra.

We therefore seek you to urgently take the following responsible actions:

- **Sustain the current well-functioning PoD system temporarily**, while simultaneously opening BCPs for those traders who suit the current level of BCP readiness. Use that temporary period to gather meaningful data and to ensure BCPs and associated systems are fully tested, functioning, and accessible to businesses in our sector. This would result in a fit for purpose, efficient and biosecure system. Future changes must be managed carefully alongside the sector and not in peak season.
- **Announce the CUC** and engage directly with the sector on the multitude of outstanding detail and questions. It must not be the case that the sector is paying more for checks that cannot happen or deliver damaged, delayed and dead consignments. The proposed approach places the cost of all the risks and untested plans on our sector.
- **Urgently meet the industry to discuss this issue.** We seek Defra to match the approach of UK horticulture in ensuring a **collaborative, open, expert, detailed, constructive and meaningful** engagement between all stakeholders involved in cross-border plant trade, to ensure we can deliver UK border changes in a way that sustains the competitiveness and viability of our sector and others involved. We are a diverse and complex sector handling difficult products, operating with low-margins yet high biosecurity throughout our supply-chains as our top priority. We believe government shares our interests in successful and secure trade.

I look forward to hearing from you.

Yours sincerely,



James Barnes
Chairman