Horticultural Trades Association (HTA)
Summary paper on Border Target Operating Model (BTOM) sector issues & asks (March 2024)

The issue
In April 2024, the current 'Place of Destination' (referred to as PODs thereafter) plant health import inspections will end. From then, checks will take place at a Border Control Point (BCP) or Control Point (CP).

BCPs are untested and there is a lack of detail or answers on many questions relating to how they will operate when handling plants and plant products. **In short, there are challenges with their capability, lack of capacity, communication, unknown costs, and certainty.**

The alternative to BCP use is to use a CP or become a CP yourself. The process to become a CP is a huge and costly endeavour requiring resources, infrastructure, investment and substantive risk. It is not an option for many SMEs and for many going through CP designation, this will not be completed in time for April. You may, once a CP, wish to apply for Authorised Operator Status (AOS). The AOS scheme has not yet entered the pilot phase and is still not a confirmed option. Even if approved, AOS will not be available to businesses until 2025, and even then they must already be CP designated.

It is just weeks away until the April change, and this change will happen end-Spring/early-Summer at the start of the peak season for the movement of plants and plant products.

The risks
If solutions are not in place by 30 April 2024 this means that the sector will either face long and **costly delays** at BCPs or **extra biosecurity risk** if not checked. Risk should not be added into the sector, the supply chain and into the wider environment, particularly at a time when volume is high, and checks should be at their most effective. It would be a backwards step for the UK in terms of biosecurity if goods are waved through the border because checks can't be done and there would be risk of extra unnecessary inflationary costs.

Our imported products comprise of plants, bulbs and seeds mainly categorised as "high-risk", meaning a large proportion require 100% checks. Plants and plant product imports are substantial – valued around £753mn. They are also perishable, live plants, requiring careful handling, temperature and environmental controls, and swift processing.

BCPs are untested and there is no detail or clarity on how the shift from 7700 PODs (at destination checks by industry experts) to checks at a handful of BCPs will boost biosecurity. The streamlined processes and cost savings claims are not a reality – we have had checks since 1 Jan 2021, spent millions already and this shift will cost more. Furthermore, the talk of a 'pragmatic' approach with no published plan raises further concerns.

Solution – an urgent ask for Government to deliver this
In summary, the Horticultural Trades Association (HTA) seeks:
1. A 'Soft launch' for Border Control Posts (BCPs) by having a temporary easement, until at least end-Jan 2025 or BCP readiness is achieved, of continued running Place of Destination (POD) checks for some trades in plants from April 2024 while also using BCPs for appropriate products.

2. Use of the time until such an easement ends to ensure full BCP readiness for plant trade, barriers to Control Point access for businesses are removed, the Authorised Operator Status model pilot is completed, full testing of BCPs has happened and there is certainty over costs and processes.

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