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Dear Minister,

### **BTOM implementation post-30 April border changes**

The Horticultural Trades Association (HTA), represents 1400 members across the UK in the environmental horticulture sector. The April border changes of checks for plants and plant products moving away from Place of Destination (PoDs), is and continues to be a huge concern for the sector. Imported plant material was worth over £780m to the UK horticultural sector in 2023, with 93% of that coming from the EU. It is a crucial part of the plant and tree supply chain with the import value representing half of the value of the UK production sector for trees, plants, seeds & bulbs, which totalled £1.58bn p/a in 2020.

We set out here our experience of these changes to date and some key critical asks. The 30<sup>th</sup> April changes have and continue to be delivered as a 'pragmatic approach', where inspections have started at a low level and systems are not yet connected. Indeed, given experience to date, the outlook for seeing even near normal volumes and operations of systems or checks remains far off. We are extremely concerned with sector confidence, the lack of any certainty, competitiveness and cost impacts.

**We seek a roundtable meeting with responsible ministers, and ask for your support to expedite** (with detail in the annex to this letter):

- **Systems issues, testing, fixes and developments** to reduce risk of disruption as the risk-engine increases and inspection rates increase, and reduce the substantive increased resource burden of checking consignment status
- **Data release and access** to inform all on the detail of imports, checks, routes, rates and volumes to inform business decisions
- **Costs** we are seeking an urgent discussion on all aspects of cost increases, as well as the challenges with the CUC level and invoicing arrangements.
- **Pragmatic approach plan and engagement on AOS/Trusted Trader or other easement support, and long-term border improvements**

The Horticultural  
Trades Association  
*Est. 1899*

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We believe government shares our interests in successful and secure trade, and a thriving and competitive environmental horticulture sector.

I look forward to hearing from you.

Yours sincerely,

**James Barnes**  
**Chairman**

CC –  
*Baroness Neville-Rolfe*

## **Annex**

### **Systems Issues**

There are significant Government-owned systems issues, where officials have had to revert to a manual system because systems have been affected since the weekend of the 11<sup>th</sup> May. This has resulted in compounding the delays and confusion already being experienced on the ground. There is limited confidence in border systems amongst importers, agents & hauliers. There are regular system outages on individual platforms, as well as the major ongoing issue being experienced at the time of writing. Many consignments selected for inspection on IPAFFS are bypassing BCPs, for example at Sevington, because systems are not working properly or not connected. This is compromising biosecurity.

We ask that any untested steps to link systems and hence ramp-up the border changes are tested before releasing any future updates or connections. Given recent experience, systems cannot be tested live for all using traders and live plant loads hoping for success. As we have shown ahead of the 30<sup>th</sup> April changes, the sector is very willing to participate in testing loads without compromising the whole sector.

### **IPAFFS hold and release notifications for inspections**

Traders are having to resort to multiple, time-consuming manual processes due to inadequacies in the IPAFFS system. For example, not being notified when a consignment that has been on hold is subsequently released, and knowing if it has had a check or not, is causing unnecessary resource burdens across the sector. Coupled with the lack of vehicle / trailer information on the hold notification, this is making the process unnecessarily reliant on significant human input and furthermore, without this information it makes it extremely difficult to determine who is responsible for which consignment and therefore the costs associated with it.

Whilst these are very specific issues, they indicate how a lack of information that could be delivered in/by government systems is leading to businesses having to add extra resource into the process of importing, it also means some consignments are not reporting for checks, or having to wait unnecessarily while the confusion is resolved.

We have proposed several urgent developments to the IPAFFS system which are key to inspection success and seek a commitment to those developments as a matter of priority.

### **Data**

Through the regular HTA and Defra team calls the team are able to see some unverified and unshareable data relating to inspections. This is used to facilitate discussions on immediate operational issues in order to find solutions. However, it is critical there is a formal process of sharing detailed information and data with the industry to enable awareness of progress, where we are in the pragmatic approach, and to inform and support importers and business decisions.

We ask for a confirmation of the publication of timely and detailed data.



## **Costs**

Costs are already beginning to impact businesses across the sector, the majority of whom are SMEs. It is projected that we will see those costs further rise significantly over the coming months as the inspections and checks are ramped up, and as the Common User Charge invoicing happens after 12 weeks of operations. Based on data collected before the 30<sup>th</sup> April, we know that trade in the first 2 weeks of May is only at 50% of its regular level due to businesses pulling forward deliveries of plants from the EU. We would expect SMEs to be most disadvantaged because of their need to bring plants in on groupage in small amounts.

There are several elements as to why costs are increasing, but the main ones are due to dwell times on port, the inconsistent charges levied by each port for using a BCP and the new Common User Charge. One HTA member, even in week one with minimal inspection levels has estimated extra costs already stand at over £1,000 per trailer. This does not take into account late deliveries, damages or loss of plant quality for the customers. They also report EU based drivers are now refusing to take haulage across the EU-GB border – one driver citing he had spent 17 hours of his working week in the 1st week of May sitting on docks waiting for checks to complete.

We are seeking an urgent discussion on all aspects of cost increases, as well as the challenges with the CUC level and invoicing arrangements. Government can also help by facilitating information so that port fees can be clearly communicated to port users using Government sourced data, so that port operators can identify consignments, match them up to hauliers and directly charge importers.

## **Meeting on near-term, pragmatic approach exit plan and other longer-term borders issues**

The above are the immediate issues we are seeing emerge over the last two weeks. There are longer term goals which we are expecting will be discussed at meetings yet to be scheduled to address the pragmatic approach exit plan and other longer-term borders issues. This includes AOS/Trusted Trade, CP and other possible easements. We would ask that another stakeholder roundtable be scheduled, as was held at the start of the year, bringing together cross-government leads to discuss and action immediate issues and plans for the longer term.