



# Borders and Trade

## HTA Briefing

June 2024

The Horticultural Trades Association (HTA), represents 1,400 members across the UK in the environmental horticulture sector. In the absence of a Sanitary Phytosanitary (SPS) agreement with the EU, the sector has been complying with import and export requirements brought in under the Trade & Co-operation Agreement (TCA) since 1st January 2021.

The trade in plants has been subject to full import controls since that date, controls which have been introduced far in advance of most other sectors, including similar sectors such as cut flowers, food, fruit and vegetables.

The introduction of checks at Border Control Posts after 30<sup>th</sup> April 2024 for plants and plant products, is and continues to be a huge concern for the sector. In 2023 alone, the UK horticultural sector imported plant material worth over £780 million, with 93% coming from the EU. This import value constitutes half of the UK's total production value for trees, plants, seeds, and bulbs, which was £1.58 billion annually in 2020. Imported SPS material is vital to our industry's supply chain and underpins the UK production sector. Any disruptions to this process could cause issues that affect the whole industry.

These changes to checks mean that costs are now expected to top £44m per annum (at existing pre-notified consignment numbers). These costs represent a fundamental change in the way the Great Britain does business with its EU plant suppliers. It brings cost, delays, risks, reduced consumer choice and decreased competitiveness.

### Key asks for Parliament & Policy Makers

- **Prioritise negotiating a SPS agreement with the EU to cover plant health requirements (this is a longer-term ask).**

#### Immediate asks:

- Ensure the plant trade is prioritised, recognising its importance to the UK's health, environment & economy, and acknowledge the need to communicate with a sector significantly impacted by new border controls.
- In the absence of an SPS agreement, ensure the introduction of BCPs is not damaging to the sector, implementing an effective integrated system of checks that minimises delay, complexity and costs.
- Ensure BCPs are retro-equipped to deal with the critical mass of plant consignments during peak season, and that complex loads can be handled in an efficient & biosecure manner.
- Understand the implications that new systems bring to trade flow, the commercial impacts they create and how businesses are subsequently affected. Provide support to alleviate related costs and difficulties.
- Ensure that Control Point designations are accessible by horticultural businesses and recognise they differ from commercial CPs.
- Work with industry to ensure Groupage movements works for all types/sizes of businesses, ensuring there is clarity of process and understanding of the prevalence of groupage. This currently is disproportionately impacted by the shift to BCPs.
- Ensure SMEs can access all methods of border crossings, ensuring easements are in place for this category, who are the main groupage users.
- Ensure the technology works and is clear. Border related systems and processes must be integrated to smooth the imports process while reducing administration from existing processes.
- Guidance must be timely and clear, and particular attention paid to the plants sector.

#### About Us

The Horticultural Trades Association (HTA) represents nearly 1400 members in the Environmental Horticulture sector including; garden centre retailers, tree and plant growers, goods manufacturers, landscapers, and service providers.

Our industry supports nearly 700,000 jobs, has a national GDP of £28.8 billion, mitigates climate change and benefits health and wellbeing for 30 million gardeners in the UK.

#### Further Information

For further information contact the HTA policy Team via email at [policy@hta.org.uk](mailto:policy@hta.org.uk) and visit [hta.org.uk/policy](https://hta.org.uk/policy)

## Biosecurity

The industry has robust biosecurity standards and auditing systems in place, such as [OHAS](#) and [Plant Healthy](#), and has implemented the UK Plant Passporting scheme. This is mandatory to maintain traceability for all plants moving in trade and ensuring a level of competence in plant health, pests and disease amongst all professional operators. It is at the heart of horticultural businesses, otherwise they risk huge losses and wider impacts.

The industry enhances UK biosecurity through its expertise and best practice and should be recognised as such.

**Horticulture underwrites 7 of the 10 goals in the Government's Environmental Improvement Plan but to deliver this, businesses must be able to import and export with minimal administrative and cost burdens.**

## Proportions of HTA membership importing from the EU:

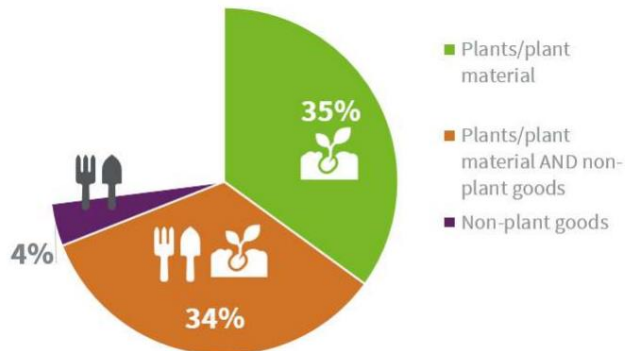


Figure 4. Does your business import plants and/or non-plant goods from the EU? (Base: HTA members, n = 138)

## Other key information

### CITES

CITES (The Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international agreement that ensures wildlife trade does not threaten species' survival. Commonly traded CITES species include orchids, cacti, aloes, and certain bulbs. The current CITES import system in the UK is outdated and heavily paper-based, conflicting with the UK's Border Target Operating Model. This system has caused significant trade losses and seizures of legal products. There is an urgent need to review and modernise CITES to remove unnecessary procedures and fully digitalise the system. Consultations from the industry will be key in this process.

### Northern Ireland

Despite the Windsor Framework improving trade between Great Britain and Northern Ireland (NI), significant barriers remain. NI's adherence to EU Plant Health regulations complicates the shipment of plants, seeds, and bulbs.

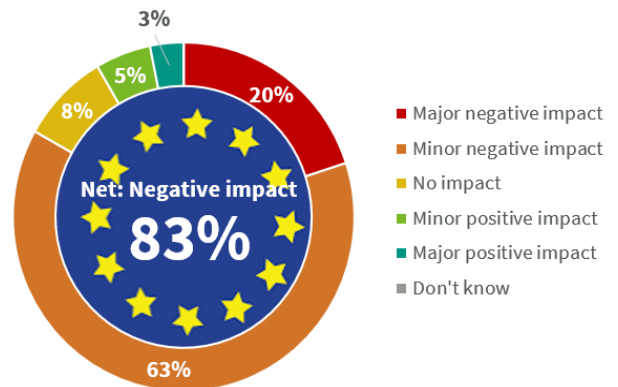


Figure 2. "Thinking about the changes to the way the UK trades with the EU since the UK's EU Exit in January 2021, how would you describe the impact (if any) on your business? Impact so far (since 1st Jan 2021)" (Base: HTA members who are importing plants/plant material from the EU, n = 95)

Issues include restrictions on certain plant species, complex paperwork, and prohibitions on business-to-consumer plant parcels. These challenges have led to a drastic reduction in GB-NI trade, with some businesses halting it altogether.

### Authorised Operator Status (AOS)

Defra has launched a pilot for the AOS model. This started in June 2024 and ends in June 2025, possibly extending beyond the 'pragmatic approach' period. AOS is inaccessible to smaller businesses as it requires prior CP status, and there is no certainty it will become an official easement. The HTA has called for government engagement to expedite AOS and find solutions for smaller businesses unable to use CP or AOS.

To find out more information please read our [submission](#) to the Public Account Committee's inquiry on UK Border Trade.

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