

To: planthealth@defra.gov.uk

Date: 28 January 2022

Ref:

Circulation:

Contact: Lucia Zitti/Chris Hartfield

Email: lucia.zitti@nfu.org.uk/  
chris.hartfield@nfu.org.uk

The NFU represents 55,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life.

## Follow-up Consultation: Method for Determining the Frequency of Risk Targeted Plant Health Import Inspections

- x The NFU supports the method for determining inspection frequencies being based on increasing data sets and evidence, and these inspection frequencies being dynamic in response to changes in risk
- x The NFU believes GB growers should be given biosecurity 'credit' not just for the processes they have undertaken in producing a finished plant, but also for the processes they will undertake in growing -on imported propagation material – all of which is carried out under the regulatory umbrella of GB Plant Health Services. The frequency of risk targeted plant health import inspection must consider and reflect this GB regulatory control, and the long-term relationships between GB growers and GB Plant Health Services. However, we are disappointed the majority of plants for planting proposals continue to remain at 100% frequency, which hinders British growers disproportionately, placing domestic businesses at a competitive disadvantage against their EU competitors. A consequence of the current inspection methodology, without change to the fee structure, is that it will also encourage the importation of finished plants, as it is more cost efficient than buying British grown.

We would like to take this opportunity to reiterate some of the key points around the risk factors that should be considered when determining the inspection frequencies that would allow further modifications to the rates for plants for planting.

The NFU has long called for a risk-based import inspection regime for plants and plant products. We support a regime which maintains our domestic biosecurity while also facilitating smooth trade, particularly for those key inputs on which domestic producers rely on imports. This should be based on data and evidence and the probability of a pest or disease being found.

The key objective of any border controls is to detect and intercept pests that are present. This requires the use of a range of factors and will be affected by not only the frequency of the inspection, but also the

In this respect, we welcome the flexible nature of the proposed methodology which should adjust the frequency of inspections in response to data results, amongst other factors.

Defra has previously indicated that the challenge for determining the inspection frequency for EU imports is a lack of sufficient data, as pr6 (ac)61d



Ultimately, the NFU would welcome some form of SPS agreement between the UK and either the EU as a whole, or if negotiations efforts are considered exhausted at the EU level, with individual member states (as proposed to allow the import of seed potatoes) which would smooth trade between the EU and UK and reduce inspection frequencies.

## Grower case study

An NFU member has run a successful small ornamental family business since 1959, growing lilies, hydrangeas, echeveria and poinsettia indoors, and alliums, hellebores and paniculata outdoors. The business is OHAS Packhouse and Grower accredited. In 2015, the business moved to a state-of-the-art 2 hectare greenhouse, with production being largely mechanised and over 90% of products grown