



Target Operating Model

The Trade & Animal Welfare Coalition (TAWC) is pleased to respond to the UK Government's paper on its Target Operating Model for the institution of border import controls. We are a coalition of 15 different animal welfare organisations in the UK and support the aim of 'creating the most effective border in the world'. Leaving the EU has opportunities and TAWC believe that there can be improvements to the current regime of almost free movement of EU consignments, with minimal post-import checks.

- **100% Checks**

The 100% checks on animals from non-EU countries seem to have served well and extending this to EU consignments seems prudent and gives a consistent approach to border controls for live animals. Therefore TAWC welcomes that the proposals look to introduce 100% checks for live animals from 2024 with the caveat that we have reservations over the risk based approach and potentially removing dogs and cats from 100% checks in the future. The current regime has allowed the introduction of diseases in dogs that were not previously found in the U.K and the main zoonotic disease to be evaluated is Brucellosis canis, however there have recently been several other diseases of dogs and cats, not all zoonotic, but of concern to the dog and cat population. DEFRA has already implemented a 100% check on dogs commercially imported from four countries (Belarus, Poland, Romania, Ukraine) since November 2022 which appears to have worked well in protecting our animal health status and managing the illegal trade in dogs. Moving to a risk-based approach should mean that outbreaks of disease in another country may be a reason to implement special measures and that the process for doing so will be done very quickly.

The Pet Travel Scheme already has a different regime for genuine pets, although the definition of 'non-commercial' movement should be tightened up, as has been done by the EU in the Animal Health Law 2016/429. Many movements deemed to be non-commercial should, in fact, follow the 'commercial' rules. This also allows the provisions of the legislation, namely the Trade in Animals and Related Products 2011, (as amended), to come into play. These provisions allow for appropriate actions to be taken when disease is found in an animal or consignment. There are no such provisions for non-commercial movements and seemingly no or little action can be taken if a disease apart from rabies or E.multilocularis is found in animals imported under non-commercial rules.

- **Implementation**

With the introduction of the proposed TOM, to further reduce risk there needs to be a parallel update to other animal health legislation with proper sanctions, for example The Zoonoses Order is out of date.

TAWC recognises that for live animal concentrating imports through a few BCP's strengthens the checking regime as the staff both APHA and operators' expertise grows more quickly with higher volumes. Inconsistency of standards of checks can lead to BCP 'shopping', where traders use a BCP that they know has little experience and may overlook aspects of health and welfare. This is very relevant to wanting to tackle the importation of pregnant bitches or cropped ears for example. Therefore, we very much support the proposal to limit the BCPs accepting live animals.

Staff resourcing is a concern as it is vital as aforementioned to have knowledgeable trained teams at the BCP. The UK has faced a shortage of vets and so it is important to ensure provision is maintained and that staff are retained through the right employment package. Alongside this there is a need to consider how enforcement agencies will manage the increase in enforcement of the animal health and welfare legislation which is currently patchy. Extra resources should be provided and certainly ensuring budget capacity in target local authorities especially Kent could ensure that prosecutions can be undertaken by Trading Standards after the APHA work

We have not seen any mention of contingency within the regulations for products that fail the import regs and how they will be repatriated within the EU, or will they need to be destroyed. In relation to animal products this leaves the recipient with the additional costs to carry of needing to quarantine or destroy imports which they cannot come through, if the sender refuses to take them back? For live animals there are concerns over capacity for seized dogs and cats (and horses) and the lack of quarantine space as well as the absence of quarantine space for exotics which needs to be reviewed. TAWC believes there are fewer than 150 quarantine spaces in the UK, all in England, and if 100% checks are implemented for dog imports, these could be filled very quickly.

With some diseases, it only needs it to come in once for there to be an ongoing problem. The current regime of checking at destination has allowed several diseases to become established such as Brucellosis canis where the UK saw its first human case in 2022 on contact with a rescue dog from Belarus. There is also the increased biosecurity concerns with inland BCP's in regards to airborne diseases with some of the proposed facilities requiring approximately 25 miles to travel to them. Understanding the constraints around locating the BCPs. there should be risk guidance on accessing them such as not stopping and not opening windows.

We saw a huge lack of consistency after Brexit with uncertainty over the different ways that various ports implemented the regulations which meant that haulage companies pulled out of carrying goods and this has adversely affected the pet trade ever since. If this lack of certainty around the interpretation of the regulations is replicated in new import regulations, this will inevitably see carriers unwilling to transport goods; and fewer transport companies will lead to rising freight costs. With the date for import regulations being moved back a number of times and this relatively short consultation period, we feel that the timeline will be challenging for the private sector to meet, particularly when it is so important that time is taken to weave clarity and consistency into the regulations and time allowed for operators and regulators to absorb the information before new regulations come into force.

Businesses involved in pet products such as pet food manufacturers would welcome the opportunity of a trusted trader scheme but TAWC believes there has to be a robust method for dealing with any abuse of the scheme and that there should be appropriate sanctions put in place. The export via groupage of products containing animal protein has been very problematic and has seriously inhibited trade. We are concerned that unless adequate time is made to prepare/train/update processes for the new import regulations, the importation of groupage will carry the same restrictions and cause severe challenges for our members. The proposed categorisation of goods into high, medium or low risk is too vague and importers will want to be much clearer of the risks of materials coming into the UK. The idea of trusted traders needs more detail and how this would work on groupage consignments, especially for smaller suppliers. Such a concept would not work for live animals and should continue to only operate for animal products. There are also concerns over how trusted trader status would work to deal with the illegal wildlife trade and not create risk in this area – there needs to be clear guidance on this aspect.

TAWC recommends that DEFRA reviews its trusted trade scheme that was implemented in November 2022 for commercial imports of dogs from four countries to assess its efficacy and implementation.

- **BCPs and Animal Welfare**

Foremost 100% checks on the limited BCPs should assist in checking and identifying the import of pregnant bitches and cropped ears which will play a strong role in improving welfare. This is a good reason not to exempt 100% checks on dogs and cats. Although the Government has scrapped the Kept Animals Bill, it aims to introduce similar or better controls via single pieces of legislation though this may take longer to achieve.

BCP's play an important welfare role in giving animals the chance to rest during their journey. Facilities should be capable of releasing animals, especially dogs and cats from their containers to be able to toilet.

This is particularly the case for airports, where there is no opportunity for the animals to be toiletted during the journey, but also for road transport, where it is unlikely that van loads of dogs from southern Europe will have been let out during the journey owing to the logistics of doing so when there can be more than 25 animals per van. It is also impossible to do so for cats. Toileting in a BCP with the high levels of biosecurity is best.

Sevington may play a crucial role as the main BCP for live animals imported into Kent. It may also need to handle a wide variety of live imported animals and will need adequate expert veterinary provisions.

BCP's should only be approved if they can adequately care for consignments of animals that are stopped or found with disease. Contingency plans should be put in place for any BCP that is closed because it is holding suspect/diseased animals, for example the BCP at Frankfurt Airport has been temporarily closed twice in the last few years because of Equine Infectious Anaemia in imported equines.

Decisions will also need to be made in good time on where the BCPs will operate to ensure adequate time is available to construct quarantine and unloading facilities. There will need to be good coordination between the GB MI Countries to ensure the right BCPS are in place in the right locations to handle and enforce the trade from the Republic of Ireland particularly in equines and puppies.