

**Written evidence submitted by the Department for Environment, Food and Rural Affairs  
(Defra) (MAAB0054)**

**EFRA Inquiry - Moving animals across borders**

The Government welcomes the EFRA Committee's inquiry to investigate how new regulations will affect live animal exports, illegal pet smuggling, and the multi-million-pound equine industry.

The UK left the EU in January 2020, with the subsequent transition period having come to an end on 31 December 2020. This is an unparalleled chance for us to do things differently and better – improving the lives of our citizens, increasing businesses' access to new markets and boosting our national prosperity, while ensuring animal health and welfare continue to be protected.

In the UK, Competent Authorities work closely together to safeguard public, animal and plant health, to promote animal welfare and to protect consumers. This includes the coordination of activities through framework agreements, working groups and official guidance to ensure effective and efficient delivery, as well as coordination at policy and delivery level through liaison groups and through online resources.

**Strategic context**

Outside the EU, we are ensuring our processes at the border continue to operate smoothly and can further improve them over time.

We are working closely with UK exporters and the authorities in EU Member States, at both a national and Border Control Post level, to resolve any issues that UK exporters may be experiencing.

We are working very closely with traders to ensure they access the extensive advice available to support the transition to these new arrangements. While we are only aware of a relatively small number of rejected consignments, we continue closely to monitor any border disruption and to intervene where needed to help the businesses concerned.

The Government is introducing full import controls in stages for EU-GB trade following the end of the transition period. Recognising the impact of coronavirus on businesses' ability to prepare, the UK has taken the decision to introduce the new border controls through a phased approach. This flexible and pragmatic approach has given industry extra time to make necessary arrangements.

Traders are currently subject to physical checks at the point of destination or other approved premises on all high-risk live animals and high-priority plants and plant products. Businesses are required to obtain the relevant documentation and to pre-notify for certain movements, but they are not be required to enter GB via a point of entry with an appropriate Border Control Post (BCP) at this stage.

As processes are phased in, all products of animal origin (POAO) – for example meat, honey, milk or egg products – some products containing POAO (e.g. certain composite products) and all regulated plants and plant products will also require pre-notification and the relevant health documentation.

The phased introduction of import controls means there has been minimal impact for importers of high priority plants and plant products since 1 January 2021 and we are confident that the trade is prepared for the second phase. The phased import regime has given businesses adequate time to adapt to the new import regulations.

Once fully operationalised import controls have been phased in, SPS goods will need to arrive at an established point of entry with an appropriate BCP and there will be an increase in physical checks and samples. SPS checks for animals, plants and their products will take place at GB BCPs. Consignments must enter GB via an appropriate Border Control Post either at port or an inland site, with all necessary SPS documentary requirements.

Defra is building on the experiences of exporters earlier this year and the practical Fitness Testing from November and December 2020. The next phase of readiness seeks to validate assumptions, update models and seek assurance on the delivery of robust import capability during the implementation of the Border Operating Model<sup>1</sup>. Feasibility testing started in mid-February 2021.

We are also building on previous positive engagement with a wide range of stakeholders to ensure that they are ready for the introduction of import checks. This includes a series of webinars. We are also in the process of delivering the necessary infrastructure.

The Northern Ireland Protocol is now in effect and avoids a hard border with Ireland now that the UK, including Northern Ireland, is outside the EU. The Protocol is a practical solution designed to address a set of problems in a way that upholds the Belfast (Good Friday) Agreement. For as long as the Protocol's provisions are in force, the UK will give effect to them in a pragmatic and practical way that minimises the impact on individuals and businesses.

This inquiry comes while the coronavirus pandemic continues to impact all aspects of our lives, including the movement of people, and the animals that accompany them, across borders. The pandemic has also reinforced the importance of suitable controls to protect animal health and the real threat zoonotic disease outbreaks can pose to public health.

1. Does the UK have sufficient resources and capacity to certify, record and inspect animal movements across its borders?

There will be additional capacity for checks on live animals from the EU at the border. This will include BCP facilities for all types of animal imports at Dover and Holyhead. At Sevington, we will have facilities for all animal imports carried by Eurotunnel. In addition to existing provision at UK airports, there will be live animal capacity at Cairnryan, South Wales

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<sup>1</sup> <https://www.gov.uk/government/publications/the-border-operating-model>

and a small provision for commercial pets at Tyne. It is also expected that other inland sites will have animal facilities, as well as at some commercial ports.

Working with APHA and FSA we have put in place robust surge capacity for both local authorities and veterinary certification providers as short-term support, if needed. Demand for this is currently low, but we continue to assess certifier capacity and emerging issues via our daily calls with industry. In total, we have more than doubled the number of Official Veterinarians qualified to sign EHCs for animal products since 2019. As at 15 March 2021, 1,824 Official Veterinarians are available to undertake new checks on animal products, including physical checks, with a further 346 OV's receiving subsidised training. This compares with the 1,449 OV's available before Christmas 2020. Increased numbers of official certifiers are an essential part of enabling the food industry to take advantage of the opportunities and changes that the UK's new status as an independent trading country will bring.

## 2. How effectively will the UK be able to conduct animal disease surveillance and respond to outbreaks?

As an independent trading nation, it is essential we remain vigilant to global pests and diseases to understand the scale and impact of these risks, both now and in the future. The assessment of risk enables us to effectively identify, detect and respond to threats. We have a world-class network of scientific risk analysts for both terrestrial and aquatic animal health. To gather information on global changes in animal pest and disease distributions, we routinely carry out horizon scanning and risk analysis, including monitoring developments around the world.

The UK has an established Veterinary Risk Group (VRG) which identifies and assesses how to manage new and re-emerging animal health and welfare threats in the UK. The VRG is directly supported by a network of expertise across all UK policy areas, animal health and welfare delivery agencies, and enforcement bodies. It is supported by species specific expert groups, working closely with private and government vets to provide focal points of expertise.

APHA is responsible for the delivery of animal health controls, including endemic and exotic disease surveillance and outbreak response in England, Scotland and Wales. The Department for Agriculture, Environment and Rural Affairs (DAERA) provides equivalent services in Northern Ireland.

In England and Wales, the scanning surveillance network enables timely detection, characterisation, assessment and mitigation of disease-related threats to livestock and wildlife, delivered by APHA's network of Veterinary Investigation Centres (VICs) and laboratories, in partnership with external post-mortem service suppliers and the APHA Surveillance Intelligence Unit. The externally contracted network of suppliers of post-mortem services has recently been expanded, making the service more accessible, which should increase sensitivity of threat detection. This surveillance system is supported by internationally recognised scientists in APHA and state of the art diagnostic technology, based at APHA Weybridge and the Pirbright Institute, funded through Government

Surveillance and R&D contracts. A similar surveillance system exists in Scotland, delivered by SRUC Veterinary Services, and in Northern Ireland, delivered by AFBI.

3. What impact will the new UK-EU agreement have on moving animals across the Irish border and between GB and the EU/Northern Ireland?

The Northern Ireland Protocol is separate from and largely unaffected by the EU–UK Trade and Cooperation Agreement (TCA).

The measures in the Northern Ireland Protocol will continue to apply. Trade in goods between Northern Ireland and Ireland, and between Northern Ireland and other EU Member States, is unaffected – with no change at the border, no new paperwork, and no tariffs or regulatory checks.

Arrangements on SPS matters are distinct within the Protocol, which requires that Northern Ireland remains aligned to EU SPS regulations in order to preserve the open border with the Republic of Ireland. This means that for animals moving from Great Britain to Northern Ireland (and Great Britain to the EU), full document checks and checks on live animals take place.

There are no changes to the animal welfare in transport requirements as a result of the new TCA although new requirements did come into force following the end of the Transition Period.

In April 2020, the EU Commission published a series of “Readiness Notices” in order to prepare transporters of live animals for the end of the Transition Period. These notices emphasised that Transporter Authorisation, Certificates of Competence, Vehicle Approval Certificates and Journey Logs issued by the UK, for the transport of live animals, would no longer be valid for use across the EU after 31 December 2020.

We decided to take a reciprocal approach towards EU issued documentation and from 1 January 2021 we have ceased to recognise EU issued transporter documents.

Under EU rules we were unable to suspend or revoke transporter authorisations even when serious non-compliances were found. Requiring European transporters to obtain GB documentation should facilitate better enforcement, ensuring in future that we can suspend or revoke transporter documents where non-compliance is identified.

Under the terms of the Northern Ireland Protocol, Northern Ireland will continue to accept transporter documents issued in the EU.

4. How should the Government balance animal health and welfare alongside economic interests?

High standards of animal health and welfare are not in competition with economic interests, but integral to a sustainable and vibrant economy. Disease outbreaks among farm animals can cause significant economic harm. Maintaining high standards of animal health and welfare helps to minimise the risk of zoonotic disease outbreaks which can create a real threat to public health and potentially disastrous social, environmental and economic

impacts. High health and welfare standards are important factors for the livestock sector in supporting net zero emissions and addressing the challenge of antimicrobial resistance. Maintaining robust controls on the spread of disease is a core requirement of the market access opportunities for UK businesses to export our high-quality animal products around the world.

Our animal welfare standards form part of the high production values which underpin the confidence of domestic consumers in the food they eat and the demand for our high-quality UK produce overseas. This Government is committed to upholding the UK's long-standing tradition of high animal welfare standards, and our manifesto made the clear commitment that in all our trade negotiations, we will not compromise on our high environmental protection, animal welfare and food standards. This position has been reiterated in the UK Internal Market White Paper, the published objectives of our trade negotiations and repeatedly in Parliament. The UK Internal Market Act 2020 provides for a system of common frameworks with the devolved Administrations to achieve consistency across the UK on devolved issues such as animal health and welfare.

Animal health is one element of animal welfare, and higher health can improve productivity on farm and help protect the nation from the public health, environmental and economic impacts of disease. For example, Bovine Viral Diarrhoea (BVD) in cattle is estimated to result in £35m of farm productivity losses in England each year and accounts for significant carbon emissions, while Porcine Reproductive and Respiratory Syndrome in pigs is estimated to cause £26m of productivity losses in England per year.

As a major component of our future farming reforms in England, we are co-designing an Animal Health and Welfare Pathway with industry, to promote the production of healthier, higher-welfare animals at a level beyond compliance with current regulations, underpinning our high international reputation for health and welfare and future increases to regulatory standards. As we start the post-EU agricultural transition, we will be phasing in a targeted and time-limited set of publicly funded financial incentives for improving animal health and welfare. For example, we are looking to financially support vet visits and through them the development of farm specific health and welfare plans which will help to inform later stages of the Pathway; we will be offering capital grants to support certain welfare improvements above the regulatory baseline; we are exploring the potential for financial incentives to reward higher welfare outcomes beyond the statutory minimum.

This, alongside improving consumer transparency by looking at ways in which marketing interventions might educate consumers about the welfare standards of the food they buy, will create the right supportive environment for sustainable and continued improvements in the health and welfare status of our national herds and flocks and help prepare livestock farmers for making these higher standards the basic legal minimum in the future.

**Live animal exports:**

5. What impact will ending live animal exports for slaughter and fattening have on UK farmers, processors and other businesses?

The Government has recently consulted on ending live exports of livestock (cattle, pigs, goats and sheep) and horses for slaughter and fattening travelling from or through England and Wales. The proposal does not include ending live exports of poultry or exports of animals for breeding purposes.

The Government's view is that animals should only be transported when necessary, and that journey durations should be minimised. Therefore, animals should be slaughtered as close to the point of production as possible; a journey to a slaughterhouse in England or Wales will always be of shorter duration than going to one on the continent. Leaving the EU has enabled the Government to address the unnecessary practice of animals being transported long distances for slaughter and fattening.

Since the 1990s, the numbers of live animals exported from Great Britain, particularly for slaughter, have declined so we would expect a ban on exports for slaughter and fattening to have a relatively low impact on our farmers, processors and other businesses.

As set out in our consultation stage impact assessment, based on internal analysis for 2018, around 6,400 sheep were transported from the UK to continental Europe (excluding the Republic of Ireland) directly to slaughter and around 9,400 for fattening. In addition, around 24,200 cattle were also exported for fattening.

The consultation stage impact assessment estimated the immediate cost of ending live exports for slaughter and fattening for livestock and horses, beginning in or transiting through England or Wales, to be around £30.2m across a 10-year appraisal period (2021-2030), which equates to around £3.5m per annum. These costs arise from an assumed 15% price differential between live animals sold domestically and in the EU.

Domestic transporters may be impacted by a reduction in the number of export journeys and in addition to this, producers and transporters operating across England and Wales would be estimated to incur additional familiarisation costs as a result of the new policy.

However, since the next stages of production (e.g. slaughter, fattening etc.) would instead occur domestically, the reduction in live animal exports is likely to lead to increased domestic activity.

We are reviewing the responses to the consultation to further refine our analysis of the possible impacts. Our proposed approach was to have a ban on live animal exports for slaughter and fattening in place as soon as possible, and we will publish a final assessment on the impacts of this policy alongside any proposed legislation. We recognise that some of the responses have raised concerns in relation to lower temperatures and restrictions on journey times. We will carefully consider all of the feedback which the consultation has generated.

6. Does the UK have sufficient capacity to slaughter and process animals that are currently exported? If not, what could be improved?

The UK has enough capacity. The number of animals exported for slaughter or fattening represents only a very small proportion of the total number of animals processed in the UK

every year. In 2020, around 2.8 million cattle, 14.5 million sheep, 11.2 million pigs and around one billion poultry were slaughtered<sup>2</sup> in the UK.

Defra engages regularly with stakeholders from the livestock production and meat processing sectors and they have not raised concerns about capacity. We are also collaborating with industry and stakeholders to ensure that we have high-quality slaughtering facilities within a robust and competitive market.

Even our smallest abattoirs have shown resilience in meeting the challenges posed by Covid-19 and continue to demonstrate their capacity to respond to market opportunities and shifts in consumer behaviour in favour of local supply chains.

### **Domestic animals:**

#### **7. How will Great Britain leaving the EU Pet Travel Scheme affect both legal and illegal movements of animals between GB and the EU/NI?**

The United Kingdom (UK) applied to the EU Commission to become a 'Part 1 listed' third country in relation to the EU Pet Travel Scheme in January 2019, and then again in February 2020. We are clear we meet all the requirements for Part 1 listed status and have one of the most rigorous pet checking regimes in Europe to protect our biosecurity. However, on 3 December 2020 we received confirmation that the Standing Committee on Plants, Animals, Food and Feed (PAFF) of the EU had voted in favour of giving the United Kingdom 'Part 2 listed' status.

As a Part 2 listed third country there are similar health requirements to travel to the EU as before January 2021, but an animal health certificate replaces GB-issued pet passports, and pets can only enter at a Travellers Point of Entry (TPE). Animal health certificates are valid for one trip only, compared to a pet passport which may be used for multiple trips. In addition, the EU has not classified GB as a tapeworm free country, so tapeworm treatment is now needed for dogs before each trip. These same requirements also apply to pet travel from GB to Northern Ireland (NI) We are working with DAERA and the Department for Agriculture, Food and the Marine in the Republic of Ireland on a permanent solution that supports pet owners and assistance dog users. We will continue to press the EU Commission on securing Part 1 listed status, alongside securing recognised tapeworm free status from the EU. Recognising that there has been no change to the disease risk since before the end of the transition period, we have listed the EU as a 'Part 1' country in our domestic legislation, meaning that there is practically no change to travellers from the EU. There continues to be no requirements on movements from NI to GB. This ensures that there is minimal impact on pet owners, and users of assistance dogs, travelling with their pets into GB under our pet travel rules.

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<sup>2</sup> UK wide data for cattle (including calves, steers, heifers, young bulls, cows and adult bulls), sheep (including sheep, lambs, ewes and rams) and pigs (including clean pigs, sows and boars) is based on slaughterhouse surveys and data provided by Defra, The Scottish Government, DAERA (Northern Ireland) and Food Standards Agency (FSA). UK wide data for poultry (including broilers, boiling fowl and turkeys) is based on data supplied by FSA, E&W Poultry Slaughterhouse Survey, DAERA and RESAS.

To deter illegal movements, pets entering GB will be subject to the same checks that are currently in place and all non-commercial pet animals entering GB on approved routes from the EU and other third countries undergo 100% documentary and identity checks. More broadly, we are committed to cracking down on the illegal movement of dogs, cats and ferrets and the end of the Transition Period has given us new opportunities to further tighten our controls.

8. Are the current rules and checks on the movement of domestic animals strong enough to prevent illegal activity? If not, what could be improved?

We operate one of the most rigorous and robust pet travel checking regimes in Europe. All non-commercial dogs, cats and ferrets entering Great Britain (GB) on an approved route will undergo 100% documentary and identity checks. The Animal and Plant Health Agency (APHA) works collaboratively with Border Force and other operational partners at ports, airports and inland, sharing intelligence to enforce our pet travel rules, disrupt illegal imports and seize non-compliant animals. Any animals found to be non-compliant with our pet travel rules may be refused entry or detained until compliant.

Whilst our current pet checking process is actively preventing the illegal movement of pets into Great Britain, there is more we can do to put a stop to animal trafficking and the abhorrent illegal trade in pets. Now the Transition Period has ended, we can go further and manage our own pet travel rules. We have listened to the concerns of stakeholders around future requirements and the Government is developing a range of options to strengthen our efforts to tackle the illegal movement of cats, dogs and ferrets. We are taking into consideration the recommendations of stakeholders such as the British Veterinary Association and Dogs Trust, as well as from the Environment Food and Rural Affairs (EFRA) itself from the special oral evidence session on puppy smuggling in November 2020. Recommendations around the age of pets at import, and on the number of pets that can be moved non-commercially are being considered.

Outside of pet travel, under the commercial importation rules, and subject to Covid-19 risk assessments indicating that it is safe to do so, APHA are responsible for carrying out post import checks at destination on commercial cats, dogs and ferrets from the EU. and checks at Border Control Posts (BCPs) for other third country imports. The system of checks reflects the risk of non-compliance. In the future, once fully operationalised import controls are phased in, commercial imports of cats, dogs and ferrets must also enter at an established point of entry with an appropriate BCP for documentary, identity and physical checks.

**Equines:**

9. What impact will the EU Animal Health Law have on the movement of equines between GB and the EU/NI from April 2021?

Since leaving the European Union at the end of the Transition Period, the movement of equines from Great Britain to the EU and Northern Ireland has been subject to a range of additional controls. These have included pre-movement blood testing, residency, and

isolation requirements to confirm the absence of disease, and documentary, physical, and identity checks on arrival at EU and NI Border Control Posts. These have added both to the amount of time needed to prepare for and undertake these journeys and the associated transport and private veterinary costs. The impact that these additional controls have had on the movement of equines is currently difficult to assess because of Covid-19.

Throughout the Transition Period, the Government worked closely with the equine industry, including the British Horse Council (which represents key interests across the racing, competition, breeding and welfare sectors) to prepare for these changes. We have continued this engagement since the end of the Transition Period in order to assist the industry in adapting to the new arrangements and prepare them for a number of further, mostly technical changes, required for GB exports to the EU by the application of the EU Animal Health Law from 21 April 2021.

For some equine movements, the EU Animal Health Law will bring benefits. In particular, the EU Animal Health Law removes one of the two blood tests required (for Equine Viral Arteritis for certain stallions) and reduces some of the pre-export residency and isolation requirements. However, horses not travelling for racing, competition, or cultural equestrian events (including the breeding sector) will be subject to additional residency requirements in their establishment of origin.

The EU health certificates required to accompany the moves will be adjusted to reflect the various changes. The equine industry is already aware of these new requirements and we will use the intervening period to ensure that the industry is fully prepared for their application.

Decisions have still to be taken about the future of animal health policy in Great Britain and the extent to which the EU Animal Health Law is applied here (Northern Ireland will be required to apply the EU Animal Health Law in its entirety as a consequence of the application of the Northern Ireland Protocol). However, the emphasis of any changes to the existing regime in Great Britain will be to enhance our already high standards of animal welfare, biosecurity, and public health.

10. Will the rules and checks on the movement of equines be strong enough to prevent illegal activity? If not, what could be improved?

While the risk associated with equine movements between Great Britain and the EU and Northern Ireland is not expected to increase with the application of the EU Animal Health Law, this is incumbent on maintaining a robust and effective enforcement capability.

We believe that our existing import requirements, including the need for pre-notification of the arrival of consignments of equines, the associated certification, and a risk-based approach to checks on arrival at GB Border Control Posts, will strike the right balance between providing the necessary protection from disease risk and illegal activity, and not providing undue obstacles to what is a highly important commercial trade. We will keep these arrangements under review and adjust them when and where appropriate.