Priorities for a UK-EU SPS agreement: Written evidence for EFRA
Wildlife and Countryside Link

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Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 90 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519. This response was developed collaboratively with member organisations across Wildlife and Countryside Link.

Summary

1. This submission includes thoughts from an animal welfare and environmental perspective, particularly focusing on the risks and opportunities relating to biosecurity, agri-food and chemicals. The Common Understanding has set a positive stage for negotiating with the EU, but it is imperative that biosecurity and animal welfare is enhanced by any agreement. The UK should follow the example of the agreement between the EU and Switzerland to 'carve-out' higher animal welfare standards.

2. There is an important opportunity to align regulation of hazardous pesticides, herbicides and biocides and integrate a precautionary approach. The UK has diverged significantly from the EU in chemicals regulation since Brexit, with further environmentally risky regression currently being considered by the Health and Safety Executive. With the UK struggling to keep pace, dynamic alignment is both the economically and environmentally sensible choice. We recommend:
    a. Dynamic alignment is established quickly and should include (a) restrictions and bands on the use of harmful chemicals, including non-approvals, non-renewals and non-authorisations (b) environmental thresholds such as Maximum Residue Levels for pesticides; (c) process alignment to match or exceed EU improvements in transparency and accountability.
    b. Dynamic alignment should be a baseline in ambition for environmentally positive chemicals management in the UK, not a ceiling.
    c. The SPS deal should explicitly recognise the UK and EU's commitment to reduce the impacts of harmful chemical pollution under the Global Biodiversity Framework, reaffirming the commitments made in the UK-EU joint statement.[1]
    d. The UK should set out a rapid timeline for alignment where divergence has occurred, as well as dynamic alignment in future.

3. The proposed reduction in border control checks is a significant concern regarding biosecurity and gene editing regulations. Invasive species, including pests and pathogens, must be prevented from arriving and causing destruction in the UK. Routine checks on higher risk imports such as large, mature trees must be upheld in particular, and data collection of pests, hosts and country of origin must continue at the border.

[1] UK-EU joint statement

2. What opportunities and risks are posed by the introduction of dynamic regulatory alignment with the EU?

Chemicals standards and Plant Protection Productions

4. Dynamic alignment on chemicals regulation is a major opportunity to improve the environment and environmental health, as well as saving resources.

5. Chemicals regulation requires access to excellent scientific information, as well as significant regulatory capacity to interpret and apply data. Without access to EU data and resources, the UK has struggled to set up a viable domestic process and as a result the UK has fallen behind the EU on regulating toxic chemicals. In the time it has taken the UK to adopt one restriction on a harmful substance (a very welcome restriction on lead in ammunition), the EU has adopted 13.[2] The European Chemicals Agency has added 41 'Substances of Very High Concern' (SVHC) since Brexit to its list of candidate list but, the UK has not added any.[3]

6. Further risky regression is being considered. For example, HSE is currently consulting on a package of deregulatory policy changes to chemicals regulation.[4] The proposals include changes to (a) the regulation of biocides, (b) the classification of hazardous chemicals and (c) their export to low- and middle-income countries.

7. The UK is subject to commitments in domestic and international law regarding plant protection products like pesticides. The Environmental Improvement Plan 2023 set a commitment to 'Promote the safe and sustainable use of pesticides'[5] and the UK has agreed to contribute to the global target of reducing pollution risk by 2030 under the Kunming-Montreal Global Biodiversity Framework. Most recently, the UK introduced a National Action Plan on sustainable pesticides that includes a domestic reduction target.[6]

8. Increasing divergence between UK and EU pesticides standards has resulted in 12 pesticides with active ingredients still authorised for use in Great Britain that are banned in the EU. 7 of these pesticides are classed as 'Highly Hazardous Pesticides'.[7] Highly Hazardous Pesticides present serious risks to human health and the environment, including acute and chronic toxicity.[8] PFAS 'forever chemicals' are widely used as active substances in common UK pesticides, with 27 known PFAs active ingredients in use, 6 of which are classed as 'Highly

[2] https://echa.europa.eu/fr/registry-of-restriction-intentions
[3] https://chemtrust.org/divergence-table/
[4] https://consultations.hse.gov.uk/hse/chemicals-legislative-reform-proposals/
[5] https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64fffa/environmental-improvement-plan-2023.pdf
[6] https://www.gov.uk/government/publications/uk-pesticides-national-action-plan-2025/uk-pesticides-national-action-plan-2025-working-for-a-more-sustainable-future
[7] https://www.pan-uk.org/site/wp-content/uploads/PANUK_Divergence_GB_EU_pesticides_14Apr2025.pdf
[8] https://www.unep.org/topics/chemicals-management/pollution-and-health/highly-hazardous-pesticides-hhps

Hazardous'.[9] Conversely, the EU is starting to take action on PFAS pesticides, with one already banned.[10]

9. A new SPS agreement is an opportunity to bring the UK regulations into dynamic alignment with the EU and integrate a precautionary approach to regulating hazardous pesticides, herbicides and biocides. For example, the EU has more stringent rules on the use of chemical herbicides like glyphosate, with a restriction on pre-harvest desiccation. The UK does not have an equivalent restriction.

10. The overuse of chemical inputs like neonicotinoids and glyphosate has generated serious risks to human, animal and environmental health. The overapplication of hazardous chemical inputs in agriculture and the environment result in widespread water pollution.[11] New evidence has emerged through the Global Glyphosate Study about cancer risks.[12] Glyphosate resistance has also been documented in UK blackgrass[13] and Italian ryegrass[14], posing a direct risk to agricultural productivity and the food system. There are clear reasons why the EU has this restriction on pre-harvest use: glyphosate does not meet the requirement for the "proper use of plant protection products", which should comply with "good plant protection practice" and "general principles of integrated pest management" (Regulation - 1107/2009 - EN - EUR-Lex). This restriction aligns with the language use/principles outlined in the National Action Plan.

11. However, the SPS Agreement is also an opportunity to harmonise rules on Maximum Residue Limits with the EU to reduce barriers to trade and remove business costs from the duplication of approvals processes.

12. Dynamic alignment would enable the UK to benefit from the scientific information and regulatory resource shared across the EU, with major potential benefits for the environment, animal and public health, as well as substantial cost-savings. A recent example is the EU's One Substance One Assessment (OSOA) Regulation, which, should the UK be able to participate, would enable greater flexibility in using data generated across multiple sectors and for different regulatory purposes, with the proposal of a Common Data Platform for chemicals, providing even greater access to toxicity data.

13. Alignment on chemicals should be comprehensive, including restrictions, bans and other controls such as non-approvals and non-authorisations, improvements in transparency, monitoring and accountability for chemical pollution reduction, and measures to make polluters responsible (such as the Extended Producer Responsibility proposals in the Urban Wastewater Treatment Directive updates).

[9] https://www.pfasfree.org.uk/pfas-in-pesticides
[10] https://www.pan-europe.info/press-releases/2025/03/eu-member-states-agree-ban-flufenacet-pan-europe-calls-immediate-action-all
[11] https://www.wcl.org.uk/bee-killing-pesticides-polluting-majority-english-rivers.asp
[12] https://www.pan-europe.info/press-releases/2025/06/new-scientific-publication-confirms-glyphosate-causes-cancer-eu-%E2%80%9Csafe%E2%80%9D
[13] https://www.rothamsted.ac.uk/news/new-early-warning-system-finds-blackgrass-evolving-resistance-glyphosate
[14] https://adas.co.uk/news/first-case-of-glyphosate-resistant-italian-ryegrass-found-in-the-uk/

14. The Common Understanding sets out the possibility of exemptions; these should be limited to areas where the UK wishes to go further than the EU baseline. The new agreement should explicitly include:

    a. The principle of non-regression, with both parties agreeing not to reduce environmental standards;
    b. The precautionary approach, underlining commitment to environmental action where there is the possibility of harm to nature or environmental health;
    c. An explicit commitment to work together to achieve the objectives of the Kunming Global Biodiversity Framework to reduce chemical pollution, including the target to halve the risk of pesticides by 2030.
    d. Cooperation towards reducing the use of animals in scientific procedures, reflecting the UK Government's and EU Commission's promised roadmaps, and a wider continued movement away from trade in goods derived from animal testing processes.

15. One risk: The UK Government should use the opportunity of dynamic alignment to set out an ambitious approach to chemical pollution reduction in the UK, including regulatory enforcement, polluter pays and extended producer responsibility, as well as more generous and targeted whole-farm support for low-input production methods. The agreement should also reaffirm and build on the shared commitments in the joint summit statement to address the "existential threats" from the climate and nature crises at international level and to working together on these issues. The agreement would be strengthened by reaffirming these aspirations and to promoting common high standards at international level.

Animal welfare standards

16. Labour was elected on a mandate to provide the greatest advances for animal welfare in a generation. Wildlife and Countryside Link hope to see this boosted in the forthcoming animal welfare strategy. To allow room for the UK Government to deliver the promised ambitious animal welfare policies and raise standards, (including but not limited to: *phasing out the use of cages for laying hens and farrowing crates for pigs and restricting imports of these products; and introducing mandatory Method of Production Labelling for animal welfare, including for imported products),* the UK-EU agreement should secure a broad carve out on animal welfare. Alignment must also not block progress on shorter maximum journey times and higher slaughter standards. The SPS agreement should explicitly acknowledge the UK's Animal Welfare (Sentience) Act 2022. This would future-proof the agreement against challenges if the UK raises protections, for example, new bans on inhumane practices.

17. There is a risk that some animal welfare policies may be weakened, particularly where the UK has introduced stricter regulation on the use of animal testing and transport of live animals for example which was made possible by the Trade and Cooperation Agreement. Government must confirm that the Animal Welfare (Livestock Exports) Act 2024[15] will not be reversed in

[15] Live exports (Enforcement Regulations 2024 https://www.legislation.gov.uk/ukdsi/2024/9780348263602

any SPS negotiations and that the UK will maintain the current ban on live exports for slaughter or fattening from Great Britain; Similarly, the SPS agreement must not weaken the UK's ability to restrict imports linked to poor welfare, such as puppies and kittens from illegal or low-welfare breeding operations abroad, wild-caught animals for the exotic pet trade, and imports of fur or foie gras.

18. It is encouraging that Government intends to keep high animal welfare standards in this SPS agreement but embedding an explicit 'carve-out' for animal welfare policies will be crucial, as was the case for the EU and Switzerland agreement. The EU – Switzerland Agreement allows Switzerland to continue to apply various provisions of Swiss law for the purposes of maintaining its animal welfare standards, including explicit provision for the maintenance of the Swiss important ban on fur and fur products produced in a cruel manner.[16] A private members bill proposing prohibition on the importation and commercial sale of fur and fur products is currently before the UK Parliament and should this well-supported bill become law, the UK Government will need to ensure that its SPS agreement with the EU makes provisions to allow trade prohibitions to be enforced. Given uncertainties regarding the consideration of trade in unprocessed (raw) furs and their status as agri-food products within the scope of the SPS agreement, the UK Government must find a way to maintain its right to enforce a ban on fur imports, as well as more broadly trade in products that do not meet UK legal standards and are at odds with public morality, to ensure a prospective ban is enforceable in the future.

19. The Common Understanding has set a positive precedent for negotiating with the EU but providing clarity on a couple of issues early in the process, including what the SPS agreement does and does not cover, is a sensible start to smoother discussions. While the CU includes agrifood measures, live animals, consumer protection measures and pesticides it does not explicitly mention animal welfare. Without a specific carve-out, the agreement could prevent the UK from restricting EU imports that don't meet British animal welfare standards which may inhibit any move to increase British animal welfare standards such as a ban on caged eggs independent of EU standards and may also inhibit the UK's ability to apply welfare standards to third-country imports.

20. It is important that the UK is clear that there must be no rolling back of animal welfare standards such as the ban on live exports of farm animals and not downgrading the total ban on using sow stalls in England, Wales and Scotland as many EU countries permit 28 days of use. There must also be assurances that this will not disrupt prospective standards to ban on live imports of puppies, raise farm standards and introduce mandatory labelling of food products.

21. Moreover, pursuant to the Animal Welfare (Sentience) Act 2022, Government decisions on UK wide trade agreements impact the UK collectively and therefore amount to policy which may be the subject of a report of the Animal Sentience Committee.[17] This meets the stated

[16] Protocol to the Agreement between the European Community and the Swiss confederation on Trade in Agricultural Products Establish a Common Food Safety Area Article 7(1)(v)
[17] Animal Welfare (Sentience) Act 2022 sections 2(1) and (7)

statutory purpose of the legislation of ensuring the Government has due regard to the ways in which its trade policy, embodied in any SPS agreement, might have an adverse effect on the welfare of animals as sentient beings.[18] The Animal Sentience Committee has already highlighted the risk that trade deals which do not include animal welfare protections could increase the availability to consumers of imported animal products which are not produced in way which is permitted in the UK, therefore undermining UK animal welfare standards.[19]

22. Given the above explained effects on the welfare of animals of any failure by the UK to include carve outs in any SPS agreement we would therefore expect any subsequent: (i) draft SPS agreement; or (ii) Government position as to the inclusion of animal welfare standards in trade agreements, to be the subject of a report of the Animal Sentience Committee.

Invasive non-native species legislation

23. Invasive non-native species, pests and pathogens are among the most serious threats to biodiversity in the UK, as well as causing billions of pounds of damage each year to industries such as the water sector and the forestry sector. The passage of products across borders brings risks of contamination and colonisation of damaging species. Once established, they are extremely difficult to remove. Preventing new introductions at the border is by far the most effective strategy and this should be recognised within the new agreement.

24. There is a significant disparity between the UK list of Species of Special Concern and the EU list of Invasive Alien Species of Union concern. This designation provides legal measures and restrictions of listed invasive non-native species. Without harmony there will be a grey area for trade and management between the EU and the UK in the SPS agreement.

25. The UK list of regulated species has remained stagnant since Brexit on the 66 species that were inherited from the EU IAS list at the time. In comparison the EU has regularly updated their legislation to a total of 114 species with the latest additions, although the regulation for 2 of these species, *Castor canadensis* and *Neogale vision,* will not enter into force until 7th August 2027. [20] The process of listing and de-listing species of concern in the UK is not fit for purpose as it does not respond in an adequate timeframe to emerging threats. The EU has proven that it is possible to make legislative changes on a much quicker scale when invasive non-native species are treated as a priority issue. A new SPS agreement provides an opportunity for Government to scrutinise the inefficiencies of the current listing and de-listing process and finally move forward with invasive species legislation after five years of stagnation. We recommend increasing the list of Species of Special Concern in the UK in line with the EU Invasive Alien Species of Union Concern list. As a first step to removing the disparity between the UK and EU list of regulated species we recommend that all species on the EU list be prioritised for risk assessments in the UK if they are not already.

[18] Ibid, section 2(4)
[19] Animal Sentience Committee: Letter regarding food labelling policy (22 July 2025)
[20] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202501422 Full list of 114 regulated species available here: https://invasivespeciesni.co.uk/uncategorized/update-to-the-eu-list-of-invasive-alien-species-of-union-concern

26. Additional proposals of this SPS agreement to remove border control checks for animal and plant products entering the UK from the EU will undermine all of the possible benefits of adding additional species to the regulated list in the UK. This is a significant biosecurity concern and will increase risk of spreading pests and pathogens. More on this point in paragraphs 37-42.

Precision Breeding

27. The removal of border checks and controls under the proposed SPS agreement raises serious concerns around gene editing regulations. Since Brexit, the UK has decoupled its regulatory framework from the EU's precautionary approach to regulating genetically modified organisms (GMOs).

28. Currently, the UK is operating at a lower standard given the scientific uncertainty around the public health and environmental implications of GMOs on the market. The UK's deregulation of Precision Bred Organisms (PBOs) through the Genetic Technology (Precision Breeding) Act 2023 and subsequent secondary legislation raises serious challenges for the agricultural sector, particularly the organic sector, in relation to transparency, consumer trust, and supply chain segregation. In light of the serious risks posed by gene editing, we support dynamic alignment with the EU.

29. As outlined by the Centre for Inclusive Trade Policy, those who are developing GMOs under EU law are subject to requirements to demonstrate safety through comprehensive risk assessments and authorisation processes to prevent harm until proven otherwise. Proposed changes to EU law may adopt a less strict approach to gene editing, but these rules are yet to be introduced. Should they become law, the EU rules would strictly apply to plants, whereas the UK rules on PBOs cover both animals and plants. Gene editing poses significant ethical and welfare concerns for farmed animals which will be pushed to their physical limits – growing bigger and faster. Disease resistance does not benefit the animal and instead masks the adverse impacts of poor husbandry.[21] The UK rules also allow certain crops to bypass assessments, without mandatory labelling or traceability. However, if the EU proposals are unsuccessful or change substantially, the UK regulations will be a significant divergence from the EU framework.[22]

30. Without plans for mandatory labelling or traceability, organic supply chains - for whom the use of any genetically modified organism, including PBOs, is strictly prohibited - become exposed to the risk of contamination. This burden falls heavily on organic businesses, who are delivering benefits for people, animals and the environment. These businesses could be forced to pick up the added cost and complexities of ensuring their inputs remain PBO-free. Exporters will face trade barriers if their products cannot be certified PBO free including within the EU. It also risks passing on extra costs to consumers of organic products.

[21] https://committees.parliament.uk/writtenevidence/135892/pdf/

[22] https://citp.ac.uk/publications/gene-editing-a-barrier-to-proposed-free-flow-of-plant-and-animal-products-between-the-uk-and-eu

31. The common SPS area appears to incorporate gene editing regulation, meaning the UK would need to align with the EU rules. A new SPS agreement could integrate mandatory labelling and traceability to mitigate the risk that undeclared gene editing changes found in products exported abroad would need to be dealt with, and likely proven it was not caused by gene editing technology such as precision breeding. Failure to dynamically align (by means of an exception for gene editing) would create serious barriers for business in both the UK and trade with the EU.

3. How should traders, producers, businesses and policy makers prepare in sectors where regulatory divergence already exists or may emerge, such as in precision breeding, animal welfare and crop protection?

32. Important decisions for animal welfare are expected to be made by UK Governments in the coming years which will test regulatory divergence. They will need to be protected in negotiations with the EU in the form of the 'carve-out' for animal welfare standards. These include mandatory methods of production labelling, the phase out of cages for laying hens and farrowing crates for pigs, and the import ban on puppies and kittens is expected to be law in winter 2025. The EU is looking at some of these areas, particularly a phase out of cages for laying hens and farrowing crates for pigs but this is not an active proposal at present. All these areas will need to form part of the carve out that the UK must propose and negotiate with the EU.

33. Further regulatory divergence on pesticides, gene editing and other matters outlined above would not be in the spirit of the UK-EU SPS agreement. For example, it would be impossible to 'prepare' sectors like organic on gene editing exemptions without concrete action to introduce UK requirements for mandatory labelling and traceability. Similarly, it would not be possible to prepare businesses for the implications of continued use of highly hazardous chemicals that pose human and environmental health risks: the only solution to this is to diverge by going further than the EU protections and scaling up ambition in regulation.

4. Should the UK Government engage with industry stakeholders and devolved administrations to ensure the agreement aligns with wider agri-food and environmental goals?

34. Legally binding commitments to halt the loss of wildlife and the commitment to protect at least 30% of our lands and seas by 2030 are at risk unless action towards these goals is embedded in every Government decision. The revised Environment Improvement Plan (EIP25) is expected to be published this autumn which will guide Governments actions to protect and restore the natural environment. Maintaining and improving good biosecurity is expected to feature again, including targets to reduce invasive non-native species introductions. This is already an existing commitment in the Convention on Biological Diversity.[23] There are existing statutory obligations to reduce pesticide use and Government has already published the

[23] https://www.cbd.int/gbf/targets/6

'Pesticides National Action Plan 2025: Working for a more sustainable future'.[24] The revised EIP is also expected to include details of the approach to managing chemicals.

35. Protecting the natural environment must be given the same legal weighting in the agreement as removing barriers to trade. Trade agreements are an important opportunity to develop new policies that will have a positive impact on the environment. Government departments must engage with relevant stakeholders and experts in the field to build the best agreement possible.

36. In many cases, environmental decision making is a devolved matter, meaning there needs to be coherence across the UK to deal with transboundary issues like pollution stemming from chemical inputs in agriculture. The UK will need to engage with a wide range of stakeholders to address these issues and will be expected to engage with devolved administrations on gene editing, Maximum Residue Limits, pesticides and regulatory complexity for the food and farming industry. To ensure the agreement aligns with broader agri-food and environmental objectives, the UK Government will need to deliver on its commitment to develop closer working relationships with devolved governments in order to manage future regulatory differences in devolved areas, through existing Common Frameworks rather than relying solely on UKIMA market access principles. Devolved governments raised concerns that the 2025 statutory review of UKIMA was neither co-designed with them nor offered meaningful influence, with the UK Government retaining an effective veto over devolved legislation.

5. What could the implications of an SPS agreement for trade and border controls be, including border infrastructure, resources, biosecurity, trade friction, growth and the treatment of imports from non-EU countries?

Reduced biosecurity

37. There are significant biosecurity implications associated with the proposals to reduce or remove checks of live animals, and animal and plant products at the border. We agree with Professor Emily Lydgate that "*We will still need border infrastructure to do border checks*."[25]

38. Invasive species, including pests and pathogens, must be prevented from arriving and causing destruction in the UK. The border is an active pathway for introduction of many harmful species. Pests and pathogens are primarily moved through the international trade of plants and plant products. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) states that prevention and preparedness are the best and most cost-effective approaches to managing INNS. [26] Focusing on this approach has been particularly effective for island biosecurity and should be followed in the UK.

[24] https://www.gov.uk/government/publications/uk-pesticides-national-action-plan-2025/uk-pesticides-national-action-plan-2025-working-for-a-more-sustainable-future#objective-2-set-clear-targets-and-measures-to-monitor-use-of-pesticides

[25] https://committees.parliament.uk/oralevidence/16113/html/

[26] Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Invasive Alien Species Assessment: Summary for Policymakers https://zenodo.org/records/10521002

39. Removing routine checks may save businesses costs in the short term - but the economy will bear the brunt of this in the future. Between 2009 and 2021 the annual cost of INNS to the UK economy increased by 135% to reach an estimated £4 billion each year. [27] The greatest costs are felt by the agriculture and forestry sectors, with INNS costing them £2321 and £1010 million a year respectively. Fungal pathogens were significant components to both of these sectors. Efforts to control the pathogen to causing ash dieback *(Hymenoscyphus fraxineus)* costs £883.5 million annually. It is cost effective to maintain strong biosecurity at the border and to invest in preparedness and prevention.

40. Recent research has predicted substantial plant pests and disease risks for the UK over the next 25 years. The authors advise policymakers to act proactively to protect against future pest and disease threats "*the estimated arrival probabilities reinforce the need for stringent biosecurity measures to reduce the introduction and spread of new PPDs. Strengthening phytosanitary regulations, improving surveillance of trade pathways, and fostering international cooperation will be critical in managing these risks." (Bebber et al, 2025)* [28]

41. Link strongly recommend that biosecurity is upheld and strengthened instead of diluted as this agreement has proposed. Routine checks on higher risk imports such as large, mature trees must be upheld. These imports are an exceptional biosecurity risk as they contain more areas for harbouring pests and pathogens.

42. Data collection of pests, hosts and country of origin must continue in a sophisticated manner at the border. This is crucial to maintaining good biosecurity by informing targeted action and cooperation with exporting nations. Border control posts are the current mechanism for collecting this data but are proposed to be removed in this SPS agreement. If this change goes ahead there must be a replacement mechanism to continue to collect this information in an effective and timely manner so that rapid response procedures can be instigated.

6. How might an SPS agreement affect the UK's internal market, particularly considering regulatory divergence across the devolved nations?

43. Regulatory divergence has compromised the internal market in several areas, from chemicals to gene editing regulations as these are devolved competencies and Northern Ireland remains subject to EU regulations.

44. Designed well, an SPS agreement has the potential to improve coherency on chemicals in the UK internal market. Pesticides are a devolved matter, though there is a Chemicals and Pesticides Provisional Common Framework applicable to the entirety of the UK. Northern Ireland is subject to EU regulatory requirements for plant protection products, including pesticides and Maximum Residue Limits.

[27] Eschen, R., Kadzamria, M., Stutz, S., Ogunmodede, A., Djeddour, D., Shaw, R., Pratt, C., Varia, S., Constantine, K. and Williams, F. (2023) An updated assessment of the direct costs of invasive non-native species to the United Kingdom. *Biological Invasions*, 25, pp. 3265-3276. Available: https://link.springer.com/article/10.1007/s10530- 023-03107-2

[28] Bebber, D. P., Maclean, I. M. D., Mosedale, J. R., & Youngman, B. D. (2025). Potential impacts of plant pests and diseases on trees and forests in the United Kingdom. Plants, People, Planet, 7(5), 1538–1550. https://doi.org/10.1002/ppp3.70023

45. Failure to align with the EU on pesticides and biocides creates a barrier to business and undermines regulatory consistency across the UK internal market, and with the EU as our closest trading partner. Businesses operating across the devolved nations and with operations in the EU need regulatory coherence and stability to deliver strong economic returns.

46. Gene editing is a devolved competence, and Scotland and Wales have retained the EU regulations. Northern Ireland is also subject to the EU rules, under the Windsor Framework. However, the Internal Market Act restricts Scotland and Wales from enforcing higher regulatory standards on PBOs, even within their own markets. Should the UK advocate for gene editing to fall within the exceptions to dynamic alignment, there would be a material risk of further compromising the internal market through divergence and the lower standards on PBOs within English law.

7. What impact could the proposed SPS agreement have on upcoming Defra agri-food and environmental strategies, such as the Land Use Framework, Food Strategy, Farming Roadmap, and efforts to improve farming profitability and sustainable growth?

47. It is essential that the UK-EU SPS agreement does not dampen the ambition or delay the forthcoming Animal Welfare Strategy. This also applies to the Food Strategy or the Farming Roadmap. The UK Government must strive to implement new policies that improve animal welfare and biosecurity, rather than wait to align with the EU.

48. There are positive opportunities for Government to align the Food Strategy and the Farming Roadmap with some of the positive animal welfare policies in recent EU publications, including the Vision for Agriculture which proposed the phase out the use of cages in agriculture and introducing EU-wide animal welfare labelling.

49. Farming profitability relies on certainty, which could be bolstered by the introduction of the UK-EU SPS agreement. The success of the Land Use Framework and 25 Year Roadmap for Farming will both be contingent on their ability to foster a just, agroecological transition for farming - while ensuring that food production and nature recovery operate in harmony. For the reasons outlined above, it is crucial that exemptions to dynamic alignment do not compromise nature-friendly farming and sectors that are delivering strong benefits for public health and the environment, such as organic.

50. A decrease in biosecurity and phytosanitary restrictions at the border will raise the chance of plant pests, pathogens and diseases and other INNS entering the UK. This will undermine the success of the significant Government initiative to increase woodland cover to 16.5% of England's land area by 2050. Increasing the biosecurity risk presents very poor value for money by risking the health of the young trees being planted.