

UK-EU SPS agreement

February 2026

This briefing is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)).

Executive summary

The Common Understanding announced in 2025 sets a positive platform for much closer cooperation towards strengthening the UK and EU economies and working together on addressing the common existential threats we face from the interrelated climate, nature and pollution crises, and for improving the lives of millions of animals.¹

We welcome deeper UK and EU cooperation to establish a common agri-food area, which should build on these aspirations and secure a positive outcome for our shared environment and economies by:

1. Ensuring the **commitment by the UK to dynamically align** with EU agri-food regulation **is comprehensive and sets a regulatory baseline – and not a ceiling** - for environmental and animal welfare ambition. Bar a few notable exceptions (such as on animal welfare), [most environmental protections](#) post-Brexit have not matched improvements at EU level and some have weakened, e.g. pesticide rules. Dynamic alignment will help bring regulation back within EU levels of protection.
2. **Dynamically aligning with the EU on genetically modified organisms (GMOs)**, rather than seek an exemption from alignment for them, given the scientific uncertainty around its public health and environmental impact. Any potential exemption would have limited impact as they cannot be exported to the EU.
3. **Using limited exceptions** that should not “[lower standards compared with EU rules](#)” to ‘**carve out**’ **higher animal welfare standards**, following the example of the EU-Switzerland SPS Agreement. A non-regression clause would maintain existing protections in cases where the UK has higher standards than the EU including animal testing and the Animal Welfare (Livestock Exports) Act 2024.² UK farming should not be undercut by low-welfare imports, and this could be underwritten by the introduction of mandatory method of production labelling to support British farmers.

¹ <https://www.gov.uk/government/publications/ukey-summit-key-documentation/uk-eu-summit-common-understanding-html>

² Live exports (Enforcement Regulations 2024 <https://www.legislation.gov.uk/ukdsi/2024/9780348263602>)

4. **Taking a biosecurity first approach** to offset the loss of routine import control checks, given the substantial potential cost to precious species and the UK economy from invasive pests and disease. This could be achieved by the following measures to:
- Maintain routine inspection of animal, plant and plant product imports that present the greatest risk - specifically, this should include large trees, mature trees, and trees which are root-balled and in soil.
 - Realign with strong biosecurity measures to require plant imports to be free from soils and growing media. The EU already requires this of the UK and both nations require this from non-EU countries.
 - Secure protected Zone status for priority pests and pathogens, including plane wilt (*Ceratocystis platani*) and *Xylella fastidiosa*.
 - Maintain and develop high-resolution data collection of pest and pathogen imports at the border.

Introduction

On 19 May 2025, the UK and EU agreed a new Strategic Partnership, which included working towards a Common Sanitary and Phytosanitary Area (SPS) agreement to ease checks of agri-food traded between GB and the EU, and between GB and Northern Ireland. In [the UK and EU Common Understanding](#) published to establish the terms of the new agreement:

- The UK committed to dynamically align with EU rules on agri-food products and food safety, the regulation of live animals, plants, plant products, pesticides, organics, and marketing standards. This removes the requirement of a SPS certificate or check for most movements of animals, plants, and related products between Great Britain and the EU.
- Limited exceptions can be agreed to dynamic alignment if they:
 - Do not lead to lower standards than those in the EU.
 - Do not disadvantage EU animals or goods entering Great Britain.
 - Respect the principle that only animals and goods compliant with European Union rules move into the EU.

1. Pesticides

Risks and opportunities

Although the UK was seminal in establishing EU pesticide standards as a member state, standards in Great Britain have fallen sharply behind those in the EU since EU exit (whilst Northern Ireland falls under EU regulation under the Windsor Framework). This has risked UK food containing higher levels of more toxic chemicals that are harmful to health, as well as the use of more toxic pesticides with fewer conditions on their use harming our wildlife

and waterways. It has also meant more checks and administrative burdens on movements of food and drink which has led to delays and costs on suppliers and supermarkets.

Pesticide Action Network UK has given two clear examples of how standards have diverged from the EU's post-Brexit.³

First, there has been a “tranche of automatic approval extensions for active substances”, due, at least in part, to a lack of capacity to manage the Britain's approvals regime properly. As a result, at last count, in April 2025, there were 12 pesticide active substances still authorised for use in Britain but banned in the EU, seven of which are classed as ‘Highly Hazardous Pesticides’ due to the serious risks they present to human health and the environment, including acute and chronic toxicity.

One example relates to PFAS ‘forever chemicals’ that are widely used as active substances in common UK pesticides,⁴ with 27 known PFAs active ingredients in use, 6 of which are classed as ‘Highly Hazardous’. Conversely, the EU is starting to take action on PFAS pesticides, with one already banned.⁵ EU member states are also exercising their ability to act ahead of the EU in protecting their environment from pesticides, which plays an important role in driving EU action on these substances. In 2025, Denmark announced it would restrict six PFAS active substances used in over 30 pesticide products because of their links to a PFAS breakdown product called TFA (which is found in very high levels in UK water bodies), recognising the risks to public health and the environment.⁶ Sweden is reviewing a similar approach.⁷

Second, HSE has weakened hundreds of safety limits for pesticide residues allowed in food, potentially increasing chemical exposure and the associated health risks for British consumers.⁸ The EU also has more stringent rules than the UK on the use of certain pesticides. For example, the EU has banned the use of glyphosate as a pre-harvest desiccant, but it continues to be used widely in the UK for this purpose. While this reduces the need for post-harvest drying of the wheat, it also leads to significant levels of glyphosate residue in wheat and flour, which are potentially toxic and carcinogenic, the reason why this practice is banned in the EU.

³ https://www.pan-uk.org/site/wp-content/uploads/PANUK_Divergence_GB_EU_pesticides_14Apr2025.pdf

⁴ <https://pfasfree.org.uk/pfas-in-pesticides>

⁵ <https://www.pan-europe.info/press-releases/2025/03/eu-member-states-agree-ban-flufenacet-pan-europe-calls-immediate-action-all#>

⁶ https://mim.dk/nyheder/pressemeddelelser/2025/september/otte-pfas-sproejtemidler-bliver-forbudt?utm_source=chatgpt.com

⁷ <https://fidra.org.uk/download/management-of-pfas-pesticides-danish-case-study/>

⁸ https://www.pan-uk.org/site/wp-content/uploads/PANUK_Divergence_GB_EU_pesticides_14Apr2025.pdf

The commitment to dynamically align with EU pesticides rules would therefore help bring the UK back to within EU levels of protection to the benefit of our health and environment, and to reverse the gradual, but quiet weakening of pesticide standards since EU exit. Indeed, pesticide standards have continued to fall even since the intention to work towards an SPS Area was announced.

Some opponents of dynamically aligning with the EU on pesticides are arguing that matching EU restrictions on harmful pesticides could harm food security.⁹ However, it is increasingly recognised that the widespread use of pesticides is seriously threatening future food security, from the harmful impacts it has on soil health and populations of beneficial wildlife¹⁰ essential to food production (from pollinators to earthworms), to the development of pesticide resistance which was acknowledged by the government in its action plan on pesticides in the case of black-grass herbicides.^{11 12} In relation to concerns about sovereignty, the UK has lacked the capacity or will to match the scale and pace of EU regulation of harmful chemicals since EU exit, and taking back control has come at the expense not only of a closer trading relationship with the EU, but also of the UK's environmental protections. The SPS will reduce pressure on government from replicating the work of EU scientists and regulators about chemical risks and what measures are needed to control them and ensure the UK's protections match the highest safety standards globally.

Risks

While the benefits of coming back within EU regulation exceeds potential risks, the advances that have been made in the EU since UK departure are at threat from erosion by the EU's simplification agenda. Before Christmas, the European Commission published a Food & Feed Safety Omnibus package of proposals.¹³ These include the granting of unlimited approvals to certain active substances in pesticides, with only some substances remaining approved for a limited time, e.g. that are identified as candidates for substitution. These proposals could in theory be scrapped or limited during EU co-decision process.

Recommended actions

⁹ <https://www.telegraph.co.uk/business/2026/01/09/starmers-eu-reset-risks-uk-food-security-farmers-warn/>

¹⁰

<https://www.buglife.org.uk/campaigns/pesticides/#:~:text=Research%20shows%20that%20insecticides%20cause,to%20earthworms%2C%20nematodes%20and%20springtails.>

¹¹ <https://www.gov.uk/government/publications/uk-pesticides-national-action-plan-2025/uk-pesticides-national-action-plan-2025-working-for-a-more-sustainable-future>

¹² <https://ahdb.org.uk/knowledge-library/herbicide-resistance-in-black-grass>

¹³ https://food.ec.europa.eu/horizontal-topics/simplification-legislation_en

- **Limited and justified exceptions to alignment:** Comprehensive dynamic alignment is needed, which it is anticipated should and must match both EU bans on pesticides (including EU decisions on active ingredients and Maximum Residue Levels permitted in food), as well as conditions on their use, such as a ban on pre-harvest use of glyphosate. All these aspects are integral to EU pesticides regulation, for example, conditions on use are set to meet consumer safety standards in food and manage harms to health and the environment from their use. Negotiations should also include a rapid timeline for matching regulation that GB has diverged from. It is welcome that the UK-EU Common Understanding envisaged only limited exceptions to dynamic alignment that should not “lower standards compared with EU rules”. The EU requirement for digital recording of pesticides use which currently applies to Northern Ireland should be extended to the rest of the UK as part of this process, that would monitor delivery of the government’s pesticide reduction target.^{14 15}
- **Consistent approach is needed across government, and a policy of dynamic alignment on pesticides should be supported by a unilateral policy to align on wider controls on hazardous chemicals.** Dynamic alignment with the EU on pesticides is undermined by divergent and inconsistent approaches to chemicals across government. For example, current HSE policy is diverging from the EU’s classification of hazardous chemicals – notably its decision not to adopt new EU hazard classes, including for identifying substances that interfere with the body’s sensitive endocrine (or hormone) system.¹⁶ Forthcoming secondary legislation¹⁷ could entrench this divergence and make it harder to align with EU regulation linked to it,¹⁸ e.g. bans on substances classified as endocrine disruptors in toys and food packaging. This was recently identified by the Office for Environmental Protection as a main reason why the government was largely off track in meeting its goals and commitments on managing chemicals and pesticides.¹⁹ The welcome commitment by the government to move towards greater alignment with the EU in the 2025 Environmental

¹⁴ <https://www.daera-ni.gov.uk/articles/new-requirements-plant-protection-product-ppp-record-keeping-professional-users>

¹⁵ <https://www.gov.uk/government/publications/uk-pesticides-national-action-plan-2025/uk-pesticides-national-action-plan-2025-working-for-a-more-sustainable-future>

¹⁶ https://chemtrust.org/uks_approach_edcs/

¹⁷ <https://www.parliament.scot/-/media/files/committees/net-zero-energy-and-transport-committee/correspondence/2026/january-2026/letter-from-cabseccae-the-chemicals-health-and-safety-amendment-consequential-and-transitional-provi.pdf>

¹⁸ <https://chemtrust.org/hse-deregulatory-proposals-uk/>

¹⁹ <https://www.theoep.org.uk/report/progress-improving-natural-environment-england-20242025>

Improvement Plan,²⁰ suggested a Swiss-style policy of unilateral alignment that would be consistent with a system of dynamic alignment on pesticides. This should also be extended to those areas in which HSE is policy lead too.

- **EU rules should provide a regulatory baseline and not a ceiling for UK protections:** The agreement should allow the same scope for the UK to go ahead of and take more ambitious action on pesticides, as member states such as Denmark have done. It is recognised that the rules protecting the EU single market are complicated in relation to limits on member states regulating areas governed by harmonised rules, which enables countries to act ahead of the EU in areas of “environmental and health emergencies”. In practice, this has meant that member states have taken protective action on harmful chemicals ahead of the EU in different areas. We urge the government that once this agreement is finalised, it should take the lead it previously took in areas of environmental risk. For example, the UK was the first European country to propose restricting a PFAS chemical after conducting a national risk assessment — specifically perfluorooctane sulfonic acid (PFOS), which has since been banned internationally.
- **Promoting common high standards at international level:** The joint UK-EU statement published at last year’s Summit recognised that “the climate and nature crises are existential threats to global prosperity and security”, and reaffirmed our common commitment “to the goals of the Paris Agreement and to implementing the Kunming-Montreal Global Biodiversity Framework (GBF) targets to halt and reverse biodiversity loss by 2030”. The SPS agreement would be strengthened by an explicit commitment to work together to halve the risk of chemical pollution (Goal 7 of the GBF), as well as to the principle of non-regression, with both parties agreeing not to reduce environmental standards, given that the potential for cross-border air and water pollution – for example, stemming from chemical inputs in agriculture - is one of many transboundary environmental issues we share.

2. Precision breeding

Risks and opportunities

²⁰ <https://www.gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025>

In light of the serious risks posed by gene editing to biodiversity and animal welfare,^{21 22} we support dynamic alignment with the EU. Since Brexit, the UK has decoupled its regulatory framework from the EU's precautionary approach to regulating genetically modified organisms (GMOs). 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.

Separate from the outcome of the SPS, without plans for mandatory labelling or traceability, organic supply chains - for which the use of any genetically modified organism, including PBOs, is strictly prohibited - become exposed to the risk of contamination.²³ This burden falls heavily on organic businesses, as well as other non-GMO farmers. 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.

Recommended actions

We propose dynamic alignment with the EU on gene editing. Failure to do so (i.e. by the UK negotiating an exception for gene editing) would create serious barriers for business in both the UK and trade with the EU and risks added costs on non-PBO farmers. 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, [undermining devolved powers](#) in those policy areas for which it has competence. There would be a material risk of further compromising the internal market through divergence and the lower standards on PBOs within English law.

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.

²¹ [Submission from Beyond GM on the Genetic Technology \(Precision Breeding\) Regulations 2025](#)

²² [RSPCA Response to Genome Editing and Farmed Animals, Nuffield Council for Ethics call for evidence, Sept 2019](#)

²³ [Gene-editing: a barrier to proposed free flow of plant and animal products between the UK and EU? | CITP](#)

3. Animal welfare

Risks and opportunities

The very recent publication of the new Animal Welfare Strategy includes the encouraging statement on the SPS negotiations: *“The UK and EU share high animal welfare standards and a desire to go further in many key areas. The details of the Agreement are subject to negotiation, but we have been clear about the importance of being able to set high animal welfare standards”* ²⁴

There are areas where the SPS agreement can have distinctive benefits for animal welfare, particularly by easing waiting times for live animals at EU border posts and raising UK animal welfare standards in areas where the EU decides to go further first.

There is a risk that some animal welfare policies may be weakened in areas where the UK has introduced stricter regulation since exiting the EU, including animal testing and the Great Britain ban on the export of live animals for slaughter or fattening in the Animal Welfare (Livestock Exports) Act 2024²⁵ - these hard-won protections must be maintained and it is imperative that they are not traded away in the process of securing an SPS agreement. Nor should the SPS agreement limit the UK’s future intentions, such as the ending of cages for laying hens and farrowing crates for pigs. The agreement should not only allow the UK to maintain - and in future adopt - higher animal welfare standards but should also enable the UK to require imports of meat, milk and eggs to meet welfare standards equivalent to those of the UK. Without such a power, the UK will be reluctant to adopt standards higher than those of the EU.

The summary of responses to a UK Government consultation on the introduction of Method of Production (MMOP) labelling, which closed in May 2024, has recently been published. ²⁶ Over 99% of the individual responses and more than 2/3rds of responses from business and organisations supported the introduction of Mandatory Method of Production Labelling, as set out in the consultation. ‘Fairer Food Labelling’²⁷ proposed introducing mandatory method of production labelling to unprocessed and lightly processed chicken, pork and egg products sold in the retail sector (e.g. supermarkets). The labelling would apply to domestic and imported products.

²⁴ <https://www.gov.uk/government/publications/animal-welfare-strategy-for-england>

²⁵ Live exports (Enforcement Regulations 2024 <https://www.legislation.gov.uk/ukdsi/2024/9780348263602>

²⁶ <https://www.gov.uk/government/consultations/fairer-food-labelling/outcome/summary-of-responses-and-government-response#government-response>

²⁷ <https://consult.defra.gov.uk/transforming-farm-animal-health-and-welfare-team/consultation-on-fairer-food-labelling/>

A similar proposal has recently been introduced in Germany, for pork products, and it should therefore be possible for the Government to introduce Mandatory Method of Production labelling in the UK, as recently consulted on. Perhaps more relevantly, Switzerland has introduced mandatory, specific method-of-production labelling for animal products, effective July 1, 2025. This regulation requires manufacturers and retailers to disclose if meat, dairy, eggs, or foie gras were produced using painful procedures (e.g. castration, dehorning, docking) without anaesthesia or, in the case of foie gras, force-feeding. Whilst both the Swiss labelling scheme and Defra's proposals [would] apply to domestic and imported products, the Swiss approach covers both a broader range of animals and sectors (it includes restaurants and retail).

Existing UK legislation mandates that import of meat must align with UK laws on the welfare of animals at slaughter. The Slaughter Regulation was adopted in 2009 for the protection of animals at the time of killing. It restricts meat imports from outside the EU that are not accompanied with a certificate stating the meat comes from animals slaughtered to welfare standards at least equivalent to those of the EU.

The UK Government should be able to maintain the ability to restrict imports that have not been slaughtered in accordance with UK law. For example, if the UK bans the use of high concentrations of CO₂ for killing pigs (as proposed in the animal welfare strategy) but the EU has not (yet) done so, the UK should be able to ban the import of pigmeat from animals stunned with high concentrations of CO₂. The EU should not find such a provision offensive as it is in line with the EU Slaughter Regulation's requirement for imported meat to come from animals slaughtered to EU welfare standards. We urge that such an exception is requested as part of the negotiations.

Recommended actions

The UK should follow the example of the agreement between the EU and Switzerland to 'carve out' higher animal welfare standards. The EU – Switzerland Agreement allows Switzerland to continue to apply various provisions of Swiss law for the purposes of maintaining its animal welfare standards.²⁸

This would avoid any legislative changes bringing in higher animal welfare standards in the UK resulting in British farmers being undercut by lower welfare imports (e.g. eggs from caged hens as the UK intends to ban this production method).

²⁸ https://commission.europa.eu/document/download/6868c8b3-2ace-47d2-9d67-56f14e476654_en?filename=5-agreement-on-trade-in-agricultural-products-and-protocol-establishing-the-common-food-safety-area_en.pdf

The Government to formally request MMOP labelling as an area to be included among the exceptions to the requirement for dynamic alignment in the SPS Agreement in order that this policy can be introduced.

The Government to formally request a carve-out for the Animal Welfare (Livestock Exports) Act 2024 within the negotiated SPS Agreement. This would preserve the integrity of UK law, uphold the will of Parliament and the public, and maintain the UK's position as a global leader in animal welfare.

Alignment must also not block progress on other issues, such as higher slaughter standards, and the UK Government should request an exception that would enable it to restrict imports from animals slaughtered to lower animal welfare standards than those permitted in the UK. 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 cruel products.

4. Biosecurity

Risks and opportunities

Non-native tree pests and disease have increased in the UK since the early 2000s, in part due to climate change and natural range expansion but also significantly due to increased trade activity. The border is an active pathway for the introduction of many harmful pests and pathogens and so it is crucial that biosecurity is high on the agenda. It is long proven that prevention and preparedness are the best and most cost-effective approaches to managing INNS²⁹. The Great Britain Plant Biosecurity Strategy recognises the threat of pests and diseases and commits to following 'a world class biosecurity regime'.³⁰

The proposal to reduce or remove checks of live animals and animal and plant products at the border is a downgrade in Biosecurity measures that were implemented post-Brexit to improve proactive pest prevention, which will need to be addressed in SPS negotiations and its implementation. Border control posts were constructed using more than £700 million of British taxpayer funds, and £150 million that British ports invested too.³¹ During the time that the UK was previously part of the EU SPS zone there were 11 serious new pests and pathogens of trees introduced to the UK within a 10 year period – more than one a year. Horticulture

²⁹ Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Invasive Alien Species Assessment: Summary for Policymakers <https://zenodo.org/records/10521002>

³⁰ <https://www.gov.uk/government/publications/plant-biosecurity-strategy-for-great-britain-2023-to-2028/plant-biosecurity-strategy-for-great-britain-2023-to-2028>

³¹ <https://www.politico.eu/article/uk-government-brexit-reset-deal-european-union-sps-deal/>

trade is responsible for the introduction of more species than any other pathway, with 40% of INNS likely to have been introduced by this pathway.³²

Any decline in biosecurity protocols brings an increased risk to native plants, fungi and animals, as well as expensive consequences to industries such as agriculture and forestry. Products of animal origin (POAO), particularly personal or illegal meat imports, is a significant pathway for disease such as African swine fever (ASF) and foot and mouth disease.³³ An outbreak of ASF could cost the UK between £10 million to £100 million.³⁴ Zoonotic and infectious diseases have been cited as high risk to UK National security, as well as ecosystem degradation.³⁵

Plants provide an annual value of £15.7 billion to society.³⁶ Between 2009 and 2021 the annual cost of invasive non-native species (INNS) to the UK economy increased by 135% to reach an estimated £4 billion each year.³⁷ The greatest costs are felt by the agriculture and forestry sectors, with INNS costing agriculture £2,321 million and forestry £1,010 million a year. Fungal pathogens were significant components to both of these sectors. Since the causal pathogen of ash dieback (*Hymenoscyphus fraxineus*) was introduced in 2012 it is set to kill up to 80% of the UK ash population and incurs annual costs of £883.5 million to control. Preventing new pests and pathogens arriving also safeguards our tree nurseries growing trees domestically, who underpin our woodland creation and forestry sectors.

In addition, a recent National Security Assessment published by the Government included key biosecurity concerns.³⁸ The assessment includes key threats of disease control, food production, crop failure, novel disease which could lead to disruption in supply chains and economic insecurity.

The movement of timber and used machinery with reduced biosecurity checks also poses a threat for harbouring pests and pathogens, for example used machinery is a significant

³² <https://www.nonnativespecies.org/biosecurity/pathway-action-plans/horticulture-pap-for-great-britain#:~:text=There%20are%20currently%20around%20%2C000,introduced%20via%20the%20horticulture%20trade>

³³ [Biosecurity at the border: Britain's illegal meat crisis](#)

³⁴ Defra, [Immediate measures to step up safeguards against African swine fever from Europe, gov.uk](#)

³⁵ [National security assessment - global biodiversity loss ecosystem collapse and national security](#)

³⁶ <https://planthealthportal.defra.gov.uk/>

³⁷ Eschen, R., Kadzamia, 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/s10530-023-031072>

³⁸ [National security assessment - global biodiversity loss ecosystem collapse and national security](#)

pathway for plane wilt, a disease fatal to plane trees, but not yet present in the UK. *Ips typographus*, a spruce bark beetle, is a highly damaging pest in Europe which causes widespread death of spruce trees during mass outbreak years. It is thought that the 2023 sighting of this species in Scotland was the result of imported timber. The forestry sector is highly vulnerable to the impacts of this species due to the reliance on spruce.

The Plant Health Risk Register contains details of over 1,400 tree pests and diseases, of which 600+ can impact UK tree species, and provides a rating of the risk that they present to the UK. Establishment of these species will seriously undermine Government initiatives to raise tree cover. Scientists from the University of Exeter estimate that more than half of new tree growth could be lost by 2050 due to the arrival of these tree pests, compared with growth rates if no additional pests or diseases were to arrive.³⁹ Under current trends, they predict potential severe losses for ecologically and economically important species like oak, apple, poplar and pine. To limit the impact of tree pests and disease scientists recommend that “*strengthening phytosanitary regulations, improving surveillance of trade pathways, and fostering international cooperation will be critical*”.

There is an opportunity in the agreement to strengthen biosecurity in the horticultural trade by closing the pathway of soils and growing media. In a one-way system, the EU already require plant imports from the UK to be free from soils but in the UK do not have the same requirement for EU imports.⁴⁰ Organisms easily transmitted within soil and growing media such as invasive ant and flatworm species can disrupt local ecosystems and severely impact agriculture. Current regulations fail to account for the size, rapid reproduction and spread of these hitchhikers, which could escalate without stricter biosecurity protocols. Both the UK and the EU do not accept plants with soil from third countries, demonstrating an understanding of the risks associated with this pathway.

Movements of managed bees, including Honeybees (*Apis mellifera*) and commercially bred bumblebee (*Bombus*) units, pose a well-documented pathway for spreading parasites and pathogens into the wider environment. Diseases such as *Nosema*, DWV (Deformed Wing Virus), *Crithidia* and *Apicystis* readily transmit from managed bees to wild pollinators, with significant consequences for already-pressured wild bee populations.

Recommended actions

³⁹ Bebbler, 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>

⁴⁰ EU Legal provisions on soil import, 2019. Available here: [Circabc](#) (Accessed 5th February 202)

A biosecurity first approach should be maintained in any trade agreement. There are many devastating pathogens which have not yet reached the UK and could have serious economic and environmental consequences if they do.

Government should seek Protected Zone status for priority pests and pathogens, allowing some proportionate movement controls on plants and plant products that pose a risk of introducing these priority species to the UK, including plane wilt (*Ceratocystis platani*) and *Xylella fastidiosa* - a threatening plant pathogen that has spread across European countries since 2013 and is expected to exceed costs of €20billion across Europe over the next 50 years.⁴¹ Xylella is not yet present in the UK but remains a significant risk to the horticulture trade as well as the natural environment.⁴² This should involve seeking early access to EU data to provide evidence for creating protected zones, and to scope out further protected zones that might be required.

The UK should seek routine inspection of large trees, mature trees, and trees which are root-balled and in soil as they contain more areas for harbouring pests, pathogens and soil-borne organisms. They should be checked in a secure, enclosed location large enough to fit the consignments. For example, pine processionary moth (*Thaumetopoea pityocampa*), of which there are currently no known established populations in the UK, was identified in England in 2022 on large mature pine tree imports from France.

The EU and the UK should realign by reciprocating strong biosecurity measures for the horticulture industry and require the movement of plants between the nations to be free from soils and growing media. This would protect both parties from harmful invasive species that are not yet present in the nation receiving the imports and are covered under the Invasive Alien Species legislation. This is a very possible option as the UK already exports under this requirement to the EU, and both nations already require this in imports from non-EU countries. Any alignment with enhanced EU biodiversity standards must not compromise the urgent need to eliminate peat use in horticulture, fulfilling the government's long-standing commitment.

To protect wild bee populations and to prevent the introduction and onward spread of harmful pathogens, it is essential that the SPS agreement maintains rigorous health

⁴¹ K. Schneider, W. van der Werf, M. Cendoya, M. Mourits, J.A. Navas-Cortés, A. Vicent, & A. Oude Lansink, Impact of *Xylella fastidiosa* subspecies *pauca* in European olives, Proc. Natl. Acad. Sci. U.S.A. 117 (17) 9250-9259, <https://doi.org/10.1073/pnas.1912206117> (2020).

⁴² <https://www.forestresearch.gov.uk/tools-and-resources/fthr/pest-and-disease-resources/xylella-xylella-fastidiosa/>

certification, screening and inspection of imported bee consignments. This should include robust pre-export testing, border checks proportionate to risk, and clear traceability requirements. Strengthened biosecurity for managed bees will help safeguard the health of wild bee species, protect pollination services, and reduce long-term ecological and economic costs associated with pollinator decline.

The UK must maintain and develop high-resolution data collection mechanisms to ensure that intelligence is held on imported species, numbers and any pests and pathogens they contain. This should accurately inform contingency plans and trigger a well-coordinated rapid response if a certain risk is detected. Moving to the EU system TRACES will have some advantages but improvements are needed as the data is not comprehensive and often too slow, limiting essential precautionary and timely behaviour. New Zealand has 20 targeted surveillance programmes focusing on specific pests, diseases and biosecurity risks using a partnership-provider model with industry and other agencies.

Additionally, this is an important opportunity for the UK to strengthen its own internal safeguards in policies outside of the SPS agreement. These include increasing the resources and powers of the Non-Native Species Inspectorate so that they may operate successfully at the border and beyond to increase national surveillance.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 94 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.

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The following organisations have inputted into and support this briefing:

Angling Trust
Badger Trust
Bat Conservation Trust
Buglife
Bumblebee Conservation Trust
Compassion in World Farming
Four Paws
Froglife
Greenpeace
Humane World for Animals
Organic Farmers & Growers CIC
Pesticide Action Network
RSPCA
Seal Research Trust
Soil Association
The Rivers Trust
The Wildlife Trusts