Wildlife and Countryside LINK

Biosecurity at the border: Written evidence for EFRA

January 2025

Executive summary

1. This evidence is on behalf of nature and animal welfare coalition Wildlife and Countryside Link (Link), an environmental coalition which brings together 86 organisations to campaign for the natural world. It represents views from the Animal Welfare Strategy Group and the Invasive Non-Native Species working group for the EFRA call for evidence on biosecurity at the border. Link welcomes this opportunity to provide evidence.
2. There are a number of improvements that could be made to improving biosecurity at the border:
   -The exotic pet trade continues to present a zoonotic disease threat to animals and humans. Link recommends that the regulation of the trade in and keeping of exotic pets in the UK should be reviewed and comprehensively revised. Additionally, systematic testing for pathogens potentially harmful to native UK species and humans should be carried out for all imported exotic pets and non-domesticated species.
   - The import and export of raw mink skins (commodity code 430110) in the UK should be banned after being deemed unsafe by the World Organisation for Animal Health's Ad Hoc Group in 2021. This commodity carries a risk of SARS-CoV-2.
   - Current progress to reduce the rates of introduction and establishment of INNS by at least 50% by 2030 compared with 2000, is largely off track, according to the latest assessment by the Office for Environmental Protection. The border remains an active pathway for the introduction of new and harmful invasive species and prevention must be a priority. Link recommends that the Non-Native Species Inspectorate must be granted the powers to search for invasive species at the GB border.

The adequacy of personal import controls on animals, plants and their products and the enforcement of controls

3. The risk of importing zoonotic diseases remains high due to the exotic pet trade.
4. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) trade database reported the import of over 1,095,000 live animals from at least 434 different species listed on the CITES Appendices into the UK between 2010 to 2019. These came from a total of 78 countries.[1] Born Free and RSPCA's 2021 report 'ticking timebomb' sets out how a high proportion of these imported animals are for the exotic pet trade. Exotic pets imported to the UK will carry potentially zoonotic pathogens between 2016 and 2020, of the 262 animals rescued by a European animal rescue organisation directly from private owners, 22 animals (8.4%) carried zoonotic parasites; five animals (1.9%) carried a zoonotic virus; and 15 animals

[1] https://www.bornfree.org.uk/resource/the-exotic-pet-demic-uks-ticking-timebomb-exposed/

(5.7 %) carried a bacterial zoonosis.[2] Overall, one or more zoonotic pathogens were detected in one in every seven exotic mammals admitted by the organisation. Rescued stray exotic mammals, which are most likely to be former pets, were found to have an even higher prevalence of zoonotic pathogens, with 39 of 78 stray animals (50%) carrying one or more.

5. There are no restrictions on the species of animal that can legally be owned as a pet based on zoonotic disease risk, and no requirement for exotic pets bred in the UK to be tested for zoonotic pathogens of concern before being traded. There are no animal health import requirements for pet reptiles, amphibians or invertebrates, with the exception of salamanders, pet bees and pet crustaceans and molluscs.[3]
6. Not all zoonotic diseases are notifiable in the UK. The Animal and Plant Health Agency (APHA) conducts some surveillance for diseases, but this is not adequate to show the full scale of zoonotic diseases in the import of exotic animals.
7. Salmonella species carried by pet reptiles pose a particular threat as they can be multidrug resistant as shown by one study in Spain which detected Salmonella species in 48% of the pet reptiles examined from households and pet shops, 72% of which were multidrug resistant strains.[4]
8. The trade in exotic pets has also been identified as the predominant driver of invasive species establishment across all vertebrate groups.[5]

<u>The adequacy of sanitary and phytosanitary SPS controls on commercial imports, their enforcement, and the impact on businesses.</u>

9. The risk of invasive non-native species (INNS) entering the UK at the border remains high, due to inadequacies in controls.
10. The Office for Environmental Protection have recently reported that the prospect of meeting the Convention on Biological Diversity target[6] to reduce the rates of introduction and establishment of INNS by at least 50% by 2030 compared with 2000, is largely off track.[7] The factors leading to this include not enough resources or capacity to prioritise prevention and policy integration.
11. INNS can enter the UK at the border as contaminants in parcels, containers and shipments. The Non-Native Species Inspectorate (NNSI) has estimated that 600,000 units (angling equipment, boating equipment and containers) contaminated with INNS enter GB annually.[8]

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[2] AAP. 2021. 'Infected and undetected: Zoonoses and exotic pets in the EU.' https://www.aap.nl/uploads/inlinefiles/2021_Infected%26Undetected.pdf

[3] http://apha.defra.gov.uk/documents/bip/iin/bllv-8.pdf

[4] Marin, C., Lorenzo-Rebenaque, L., Laso, O., Villora-Gonzalez, J. & Vega, S. 2020. 'Pet Reptiles: A potential source of transmission of multidrug-resistant Salmonella'. *Frontiers in Veterinary Science* 7, 613718.

[5] Evans, L.J., Baecher, J.A. and Scheffers, B.R. 2024. 'Invasion risk posed by the pet trade'. *Frontiers in Ecology and the Environment*, p.e2825.

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

[7] https://www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity

[8] Booy, O. Non-Native Species Inspectorate Update, 2024. https://www.nonnativespecies.org/assets/4-Olaf-Booy-2024-June-SF-NNSI.pdf (accessed 2025-01-23)

12. INNS can also travel undetected in soils and growing media of plants.[9] Current phytosanitary requirements for plants and growing materials imported into the UK are not fit for purpose to prevent introduction of new and harmful species and there are no biosecurity measures to exclude or check for unwanted hitchhiking species.
13. This means that invasive species can enter the UK. For example, the New Zealand flatworm (*Arthurdendyus triangulatus)* has been introduced to the UK in imported pot plants and is a threat to native earthworm and snail populations. There are no recorded natural enemies and no biological or pesticide control methods for non-native flatworms, the key control measure is to prevent their introduction to new areas.[10]
14. Ornamental plants present a substantial risk as they can carry a variety of harmful pests and pathogens. Many pests/pathogens can jump hosts/polyphagous, so even if the plant is distantly related to a native species, it doesn't mean they aren't a threat. Also, pests and pathogens can behave differently in new environments and display different symptoms when using new hosts.
15. The volume of invasive non-native invertebrates known to be entering the UK in imports at the border is likely to be severely underestimated.[13]

16. Inadequacies in controls at the border also pose a health risk, due to concerns about the import and export of raw mink skins (commodity code 430110)

17. In March 2021, the World Organisation for Animal Health's Ad Hoc Group on Covid-19 and Safe Trade in Animals and Animal Products concluded that '*commodity 430110 (raw mink furskins, whole) cannot be considered as a safe commodity for international trade*' due to Covid concerns, with mink serving as particularly potent vectors for the disease.[11]
18. Since April 2020, mink on more than 480 mink fur farms in Europe and North America have been affected by SARS-CoV-2, the most recent outbreak reported to WOAH related to a mink fur farm in Bulgaria in October 2023. The European Commission instigated mandatory monitoring for and reporting of SARS-CoV-2 in certain species, including farmed mink, from May 2021 to 31 March 2023. We are not aware of any mandatory monitoring or testing of farmed mink for the disease.

<u>The performance of Defra and its agencies (such as the APHA) in delivering the Border Target Operating Model and communicating and engaging with stakeholders</u>

19. The latest report by the OEP stated that the BTOM 'scheme has been beset by multiple delays, and the extension of checks to some fresh produce has been further delayed to July 2025.' There are improvements to be made to the BTOM to improve biosecurity against INNS:

[9] Call for new invasive species defences and for gardeners to buy British – as UK wildlife most threatened by nature invaders is revealed
[10] https://www.buglife.org.uk/campaigns/potwatch/
[11] https://www.woah.org/app/uploads/2021/04/a-ahg-report-covid19-dec2020-feb2021.pdf

- It was an initial oversight in the development of Border Control Posts BCPs that a contained unit large enough to hold large mature trees or used farm equipment was not developed before operation began. This is particularly troubling as large and mature trees are a significant biosecurity risk as they create more areas for pets or pathogens to hitchhike undetected. A temporary measure of searching the trees and equipment in the lorry or inside when possible must only be a temporary measure until a new Standard Operating Procedure and new infrastructure is built at BCPs as a priority to allow for safe inspections of large loads inside a closed and secure area.

- The regular updates outlining any changes to the BTOM and the opportunities for consultation are appreciated, but additional information and statistics are required to understand demonstrating the successes and failures of the model in relation to checks and the possible environmental impacts. The natural environment must be considered with at least an equal weighting during all consultations and decisions as achieving smooth trade is. There should also be increased transparency regarding how effective the 'full cost recovery model' used by APHA is at allowing inspectors to fulfil their duties to meet the required inspection frequencies, which have not been currently met.

- The target to reduce introductions of INNS by 50% by 2030 compared to 2000 levels is an international agreement and the progress towards this should be monitored closely. Activities at the border are incredibly relevant and crucial to this and should be publicly available.

Recommendations

20. To address the gaps in biosecurity identified above, and to reduce the attendant risks, Link recommends:

Increased transparency regarding biosecurity at the border. Defra should regularly report the scale of INNS prevent work and progress towards the CBD target and the number of inspections being met or missed.

To further limit the risk of INNS spread

a. Preventing invasive species from entering the UK must be treated as a priority to save money and reduce harmful impacts to native species.
b. The NNSI must be granted the powers to search for invasive species at the GB border. This would improve our understanding of the scale of the threat of INNS which imports bring, the types of units most likely to be contaminated and from where. This would aid in improving transparency.
c. Port operators should be supported financially to build the required infrastructure to search large mature trees, shrubs and used farm equipment indoors in a closed and secure space, as should have happened initially. Large trees should be inspected thoroughly under quarantine before moving further into the country to allow for all hidden pests or diseases to be identified.

To limit the risk of zoonotic pathogens:

a. the regulation of the trade in and keeping of exotic pets in the UK should be reviewed and comprehensively revised.
b. systematic pathogen testing for zoonotic pathogens should be carried out for all imported exotic pets.
c. Ban the import and export of raw mink skins (commodity code 430110) in the UK.

This response is supported by:

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