



ORNAMENTAL AQUATIC TRADE ASSOCIATION LTD.

"The Voice of the Ornamental Fish Industry"

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Dear Secretary of State

At a time of significant economic uncertainty as the UK exits the European Union, it is of deep concern that your Department continues to oversee the introduction of policies that will have a serious detrimental impact on our sector, and no doubt others too. It is all the more worrying that no assessments have been undertaken of the cumulative impacts of these policies on affected sectors, and no consideration given to their likely impacts in a post-Brexit environment.

For example, the Animal and Plant Health Agency (APHA) is currently proposing two new charging regimes for veterinary and plant health inspections at the border. Putting aside the different methodologies used to calculate the two sets of fees, the fact that under the latter proposals some charges will increase by an incredible 500%, and that despite these two policies generating from the same agency no consideration of the cumulative impacts has been undertaken, we are still left with a failure to give any consideration to the serious detrimental impacts such policies are likely to have on many small businesses in a post-Brexit world.

Whilst none of us can be sure what arrangements will be in place at the border from April 2019, and despite the Government's best will, it is hard to imagine that there will be no additional border checks on trade between the EU and the UK - a view echoed by the Institute for Government. A vast quantity of animals and plants currently enter the UK from the EU, avoiding any significant inspection fees and thus keeping costs down. For example, we know that less than 600 specimens of the Senegal Tea Plant (a popular aquarium plant) were imported directly into the UK between November 2016 and October 2017 (PHSI data), while we estimate 50,000 plants were actually traded in the UK. This demonstrates the significant scale of EU to UK trade and the potential for vastly increased financial impacts on our sector if it becomes subject to increased inspection fees – none of which have been considered.

Not only are businesses being asked to bear these additional costs at a time of such uncertainty, the overall provision of services across the many agencies operating at the border is often inadequate, with many of our members facing unnecessary delays in clearing consignments. Not only does this incur additional costs for them, it has welfare implications where live animals are concerned. Surely it would make more sense to improve the efficiency of Government services at the border before asking businesses to pay more for a deficient service.

Another example is that of the continuing introduction of EU-wide import and sales bans on species that present no biosecurity risk in the UK. Of the traded species and genera currently banned or proposed for a ban under the EU Invasive Alien Species Regulations, over 50% are or have been in trade in the UK aquatics sector – the targeting of our sector over arguably more high-risk sectors is a continuing trend. We conservatively estimate the cost impact on our sector of the existing bans and current proposals to be at least £10M p.a. An impact that is not justified where there is no risk, and a cost that could be avoided if a regional approach to controls were adopted, rather than the simplistic and disproportionate EU-wide approach currently being taken.

It is clear that your Department has not fully understood or taken into consideration the full range of impacts such policies can have or the cumulative sectoral impacts of them. Impacts that many small businesses in our sector will not be able sustain over the coming years.

In his letter of 30 October to Baroness Verma, Chair of the EU External Affairs Sub-Committee, David Davis MP recognised “the importance of minimising non-tariff barriers to trade” and stated that the Government was “aiming to minimise the regulatory and market access barriers for both goods and services”. And yet your Department continues to oversee the introduction of policies that do just the opposite, introducing new barriers to trade, barriers that have not been properly assessed in terms of their cumulative sectoral impacts. With such uncertainty surrounding the UK’s exit from the European Union and the delicate balance of our economy, it is surely not the right time to be introducing ever greater barriers to trade.

I would therefore urge you to reconsider the current push to increase charges on businesses until the outcome of our exit from the European Union is fully understood. I would also urge you, in relation to EU invasive species policy, to press EU partners to adopt a regional approach to listings where species are known not to be invasive across the majority of the EU, and to commit to lifting bans on those species that are not invasive in the UK at the earliest opportunity.

In such uncertain times it is vital that Government does what it can to support business instead of continuing to create unnecessary and inappropriate barriers to trade.

I am copying this letter to the Rt Hon David Davis MP (Secretary of State for Exiting the European Union), the Rt Hon Dr Liam Fox MP (Secretary of State for International Trade), the Rt Hon Greg Clark MP (Secretary of State for Department for Business, Energy and Industrial Strategy) and the Rt Hon Mel Stride MP (Financial Secretary to the Treasury).

Yours sincerely



Dominic Whitmee
Chief Executive

The Ornamental Aquatic Trade Association (OATA) represents more than 850 businesses from across the home aquarium and garden pond sectors, from importers and wholesalers to suppliers and retailers. Its core mission is to protect and promote the interests of all those engaged in the ornamental aquatic trade by promoting the benefits derived from it, setting high standards, providing good education and training, and encouraging responsible ownership and enjoyment amongst fish keepers.