



ORNAMENTAL AQUATIC TRADE ASSOCIATION LTD.

"The Voice of the Ornamental Fish Industry"

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Dear Secretary of State

I write to highlight a number of issues (not all) relating to the import and export of live animals, animal by-products and plants, some of which relate to the UK's exit from the EU and some which are longer standing and causing a lot of unnecessary issues for the ornamental aquatics industry.

Communication and advice provision

Whilst our member businesses have experienced some outstanding assistance and support from officials this is far from common. We have seen occurrences of advice being provided to businesses that is inconsistent with advice on GOV.UK or with current regulations. There have been occasions where advice has changed but not communicated to businesses or their trade associations. More often than not, written advice simply points businesses to links on GOV.UK which do not address the specific query. Our members have experienced an inability to identify the correct personnel to assist them with problems - general helpline numbers have proven unhelpful in rectifying issues for more specialised forms of trading, such as tropical fish importing. Even when they manage to speak to someone they can find they are transferred from one official to another then back again, sometimes receiving curt and unhelpful responses, and even on occasion having the telephone put down on them, suggesting that your staff are under a lot of stress.

This is a particular concern for importers who rightly wish to understand the new rules relating to imports and how quickly live animal consignments will clear through the border after arrival in the UK. There is limited information available to businesses on the status of their consignments when delayed resulting in them having to chase around various agencies for updates. All of this creates unnecessary additional burden and cost, much of which could be overcome with improved customer service and advice provision. It should be remembered that importing businesses may be able to assist in providing an early resolution to any problems.

Certification and automated IT systems

A major problem businesses currently face is the confusion around the new GB health certificates which has resulted in authorities in both the US and Dutch authorities refusing to endorse them. We understand this may in part relate to unclear cross-referencing on the certificates. This is something that could be quite easily remedied yet it hasn't been.

Member businesses have experienced difficulties in obtaining EORI numbers, with one waiting 3 weeks following application. This creates a hiatus in businesses' ability to trade.

An oft recurring issue relates to the Automatic Licence Verification System (ALVS) which enables an inspectors' decisions to be shared electronically with HMRC for customs clearance. However, links between the different IT systems used at the border repeatedly fail requiring importers to revert to manual, paper-based clearances process, adding up to 3 hours to clearance times, a concern when dealing with live animals. No-one seems to be able to identify and correct the source of the problem when it arises. If this could be sorted out it would alleviate much stress for importers, your staff and for the animals in transit.

Businesses were advised that for live animals entering the UK via an EU BCP, there would be a function available in IPAFFS to upload relevant documentation and to notify APHA of the fact they had been inspected. However, this function does not appear to be available, resulting in the need to revert to manual, paper-based clearances with the associated delays.

Businesses have experienced delays in applying for the import from the EU of animal by-products (in this case frozen fish food), with one submitting an application 8 weeks ago (14 December 2020) and still not having received a reply at the time of writing. There is also confusion with current advice as to whether an accompanying health certificate is needed. Additionally, there is uncertainty in how to declare live fish food (for example, bloodworm larvae) with no clarity being given.

Health risks

Reverting to manual clearances and using paper documents as described above creates potential issues with cross-contamination of the Covid-19 virus.

A related concern is that the UK does not currently accept electronic health certificates at the point of import meaning that someone has to physically visit the airline office, collect paper copies of the documents then hand them to APHA staff. This process is clearly not consistent with good health practices and, with the new more virulent strains of Covid-19, exacerbates health risks to the staff of the airline,

the importer and APHA. It also places people in closer proximity than might be appropriate or otherwise necessary. Accepting electronic certificates would not only mitigate health risks but would speed up processes at the border benefitting animal welfare.

Northern Ireland

You will be well aware of the difficulties created by the Northern Ireland Protocol which is likely to have significant negative impacts on NI businesses and the GB companies that supply them. One point I would raise is that, whilst helpful options have been identified and implemented to enable the transit of aquatic livestock from the rest of the world via GB to NI, these may still require animals in transit to be checked both on entry to GB and entry to NI. This raises welfare considerations for fish, for example when they are exposed to light and heat escapes from their specially designed transport boxes. I would urge that inspections are undertaken on entry to GB only if considered absolutely essential.

In summary

Businesses throughout the UK continue to be impacted by the Covid pandemic and are now experiencing reduced trade and increased administrative and financial burdens arising from EU exit.

Inefficiencies at the border do not just have implications for importers, they affect everyone in the supply chain from delivery drivers to retail staff. Every problem or delay ends with a cost that is footed by businesses along the supply chain and creates potential risks for animal welfare. These issues must also inevitably be creating a stressful working environment for your own staff.

I appreciate there are challenges involved in resolving these issues but those I have highlighted above are not insurmountable and would go a long way to improving animal welfare, supporting UK businesses and helping your own staff's wellbeing. Their resolution simply requires the investment of resources, an element of pragmatism and a commitment to improve the services provided by the agencies concerned – whom, it should be noted, charge significant fees for their services.

For the sake of businesses, their staff, your staff and for the betterment of animal welfare I urge you to resolve the issues faced by businesses in our sector.

I am copying this letter to the Chief Executives of the key agencies with responsibilities for live animal imports and exports at the border.

Yours faithfully



Dominic Whitmee
Chief Executive, OATA

The Ornamental Aquatic Trade Association (OATA) represents more than 850 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or garden pond, including retailers, breeders, importers and manufacturers, many of which are SMEs. Our sector is worth an estimated £400 million a year and employs around 12,000 people.