



## **OATA response to the “Updates to Great Britain’s Susceptible and Vector Species Lists” impact consultation**

**25 March 2024**

The Ornamental Aquatic Trade Association (OATA) represents more than 800 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or garden pond. Animals traded by the sector we represent are intended for either closed or semi-closed systems and therefore associated biosecurity risks are typically lower compared to other sectors that trade in aquatic animals.

OATA has a long history of working collaboratively with Defra and its agencies (such as the Fish Health Inspectorate and the GB Non-native Species Secretariat) to maintain and improve biosecurity standards within industry and prevent potential disease outbreaks. Unfortunately, within this response we have to express our disappointment at the handling of this consultation which has led to concern by sectors of the industry that we represent. Below we outline our concerns and potential impacts that changes to the list of susceptible and vector species might have, although it should be noted from the outset that our ability to provide a full level of detail is hampered by the lack of time provided by the consultation deadline.

### **Inadequate explanation of how controls would change for new species added to the list.**

- In the Government’s Consultation Principles document, it states that consultation should “Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated impact assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.”
- It was unclear from the consultation documents received what the new species listings will mean in practice for those that import these animals e.g. changes to export health certificates.
- The consultation would have benefitted from use of clear examples to explain what likely changes might look like for importers of newly listed species, for example, the consultation might have indicated that certain



species would no longer be imported from the EU as it is not considered an SVC free zone.

- The consultation would also have benefitted from an explanation of what competent authorities (CAs) in exporting nations and exporters will need to do to demonstrate disease free status. For example, the consultation could have stated that countries that have a monitoring and testing regime for notifiable diseases would be permitted to import listed species or if CAs could provide other evidence listed diseases could not survive in place of origin.
- Inclusion of some of this important information above would have better equipped industry to understand the impacts of the changes and provide informed responses to government. In addition, inclusion of adequate context (exemplified above) may have led to better reception of the changes to these lists by Industry.

### **Inadequate time provided to adequately assess impacts**

- The Government's consultation principles document states that: "Consultations should last a proportionate amount of time" and that "Consulting too quickly will not give enough time for consideration and will reduce the quality of responses."
- Only 8 weeks were provided for responses to this consultation, 4 weeks less than expected from previous government consultations. It is unclear why this consultation was shortened and why industry was not provided with any kind of pre-consultation meeting or notice to better inform how the consultation was written.
- The short time frame in combination with inadequate background information within the consultation meant that important information regarding future controls was only communicated in a meeting with officials 2 weeks out from the deadline of the consultation. This subsequently left industry with insufficient time to gather all the relevant information on likely impacts to trade.
- We therefore can only provide limited information on likely impacts to trade in this response.

### **Protocol for government consultations do not appear to have been followed**

- The Government's consultation principles document states that officials should: "Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view."



- Given that the consultation documents shared state that “The expectation is that all the changes will come into effect on 31st May 2024. The updated lists will be published on GOV.UK.” it seems as though these changes will come into effect regardless of the consultation responses received. This would appear to be in contradiction to the guidance quoted above.
- It is also unclear from the consultation document if there is a specific webpage, form or email to submit the consultation to.

### **Lack of sufficient detail on the listing process provided**

- From the consultation documents shared it was unclear whether the government conducted its own assessments of species for inclusion on the Susceptible and Vector Species List. It was only made clear in subsequent meetings with officials that UK authorities relied solely on WOAHP assessments to decide which species to list.
- It should be noted that this appears to be different to the process undertaken by other countries e.g. EU, and that the reasons for this were only explained in meetings with officials after the consultation document was sent out.
- Whilst we do not dispute the quality of the assessments that underpin the updated listings of SVS, we do question why assessments were not done on the balance of risk posed by those species. After meetings with officials, it is clear that species were listed on the basis of IF they could carry a notifiable disease, not the likelihood of the species spreading the disease. Given that species destined for our sector are destined for closed or semi-closed systems, it would have been pertinent for the consultation document to explain why the likelihood of potential pathways of transmission were not included in the process of updating the lists.

### **Likely impacts to trade in ornamental aquatic animals**

- As discussed above, it is difficult to fully assess the impact of listing these new species on the SVS list in the timeframe provided.
- Additional costs on businesses may occur as a result of changing supply routes for certain species to ensure they now come from disease free zones/compartments/countries. These may be significant where mode of transport changes e.g. via road from Europe to via air from more distant sources.
- Where CAs in countries of export are unable to prove disease free status, it is possible some species may drop out of trade – this could incur significant losses in revenue for UK businesses.



- Additional changes to export health certificates may result in a period of adaptation and potential incorrect reporting while businesses adapt to changes. This could result in significant delays at the border if consignments are held or delayed due to incorrect paperwork and we would urge pragmatism during early stages of implementation.

### **Key further areas of clarity needed**

In order to minimise impact on businesses, further clarity would be appreciated in several areas:

- Can the government confirm that the CAs of key exporting nations of newly listed species will be contacted to ensure they are aware of changes needed to support exporters?
- What steps will the government take to ensure that implementation of the new SVS list will not result in unnecessary delays at the border?
- Can the government provide clarity on whether the risk associated with species intended for closed or semi-closed systems was considered before including a species on the updated SVS list? If this was not considered, can the government provide a justification for this?
- The consultation document makes reference to wild collected animals requiring a period of quarantine before entry is permitted into the United Kingdom, can the government confirm if there are any changes to the import controls applied to those species listed on the Susceptible and Vector species list or will these controls remain the same after the new species listings come into force?

