The Border Target Operating Model (BTOM) Great Britain

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The Border Target Operating Model (BTOM)

Key Deliverables:

- Create the most effective border in the world

- Using advances in technology to simplify and streamline import and export trade processes

- Improved regime of Sanitary, Phytosanitary and Security Controls Essential to :
  - Better Protect the Environment and Public health
  - Deliver Imported Food that is safe to eat
  - Maintain Food Supply for consumers
  - Disrupt Criminal Activity
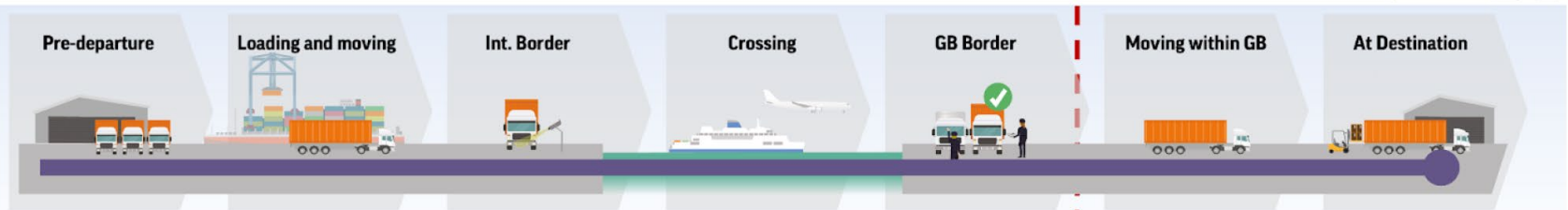
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The Border Target Operating Model (BTOM)

Key Deliverables:

- **Data Driven Approach**

- **Using Technology to Reduce Paperwork**

- **Eradicating the 'Cumbersome and Frustrating' approach to carrying out checks**

- **Bringing in a more targeted, risk-based system underpinned by evidence and data**

- **£1 billion investment across this government spending review period**
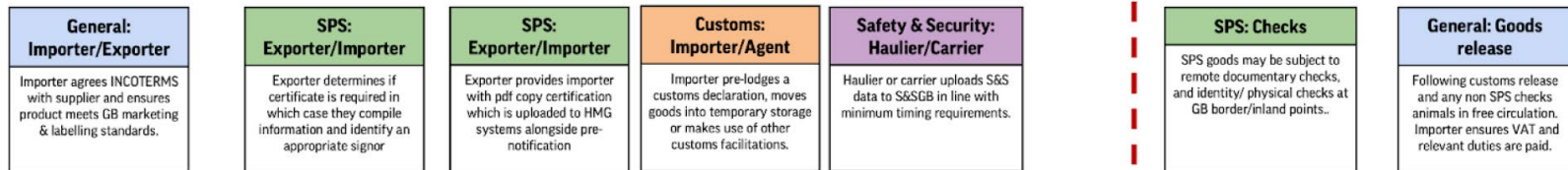
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The Border Target Operating Model (BTOM)

Summary of how the Border Target Operating Model will improve the import process

| Pre-departure | Loading and moving | Int. Border | Crossing | GB Border | | Moving within GB | At Destination |

Current RoW Importing Process

General: Importer/Exporter	SPS: Exporter/Importer	SPS: Exporter/Importer	Customs: Importer/Agent	Safety & Security: Haulier/Carrier	SPS: Checks	General: Goods release
Importer agrees INCOTERMS with supplier and ensures product meets GB marketing & labelling standards.	Exporter determines if certificate is required in which case they compile information and identify an appropriate signor	Exporter provides importer with pdf copy certification which is uploaded to HMG systems alongside pre-notification	Importer pre-lodges a customs declaration, moves goods into temporary storage or makes use of other customs facilitations.	Haulier or carrier uploads S&S data to S&SGB in line with minimum timing requirements.	SPS goods may be subject to remote documentary checks, and identity/ physical checks at GB border/inland points..	Following customs release and any non SPS checks animals in free circulation. Importer ensures VAT and relevant duties are paid.

Benefits of the TOM

Removal of certification for low-risk goods
The TOM will remove SPS certification requirements for 2.3m low-risk imports p.a compared to the EU approach

Single Trade Window
Single Trade Window creates a single portal for managing Customs, SPS and S&S requirements for traders, delivering data submission efficiencies

SPS Trusted Trader pilots
By piloting trusted schemes for the import of plant and animal products the TOM will offer businesses new ways to manage controls more easily.

Simplified and digitised certificates
Health certification will be simplified and digitised for some trading partners to allow for quicker completion. Digitisation will allow for exporters to input directly to HMG systems and cloning of certificates.

Reduction of S&S requirements
The TOM will reduce S&S data requirements by around 35% and remove requirements for certain categories of low-risk movements

Check reduction
The TOM will implement a global risk-based model, reducing physical & identity checks on lower risk SPS goods compared to the EU approach

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The Border Target Operating Model (BTOM)

Improving Border Processes for Exports:

A single gateway for all export processes – The Single Trade Window

- Make export declarations
- Management of Authorisations
- Management of Export Licences

Removing S&S Requirements for low-risk export movements in addition to those removed in July 2022 (empty units under a transport contract, Merchandise in baggage over £1500, outbound goods when transhipped and leaving via a different port)

Remove S&S requirements for :

Some outbound Freeport goods, outbound transit and fish from UK waters landed in non-UK ports

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Mandatory New Safety & Security requirements (S&S)

S&S declarations (Entry Summary Declaration – ENS) are submitted by the operator of the active means of transport for example the haulier or ferry operator

They are currently declared using the S&SGB system which needs specialist software this will change to the entry via the self-serve functionality of the Single Trade Window for free

S&S declarations help to ensure that interventions at the border are based on risk

For goods from EU this approach will support an intelligence informed approach to risking facilitating the flow of legitimate trade by reducing the number of 'false positive' hits

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Mandatory New Safety & Security requirements (S&S)

The first release of the Single Trade Window will be delivered from November 2023

It will include the ability to enter S&S data for imports which will allow imports from ROW to be entered

The requirement for S&S to be submitted for goods from EU will be implemented in October 2024 via the Single Trade Window

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Mandatory New Safety & Security requirements (S&S)

For imports from EU and Rest of the World:

- **Reduce S&S data requirements from 37 data fields to 24 mandatory fields**

   The remaining 13 fields become optional so that if companies wish to continue to provide this data so they don't have to change their current procedures/systems they can do so

- **Annex A of the BTOM lists the mandatory and optional fields**

- **Make it easier to submit the data by utilising the Single Trade Window**

- **Improve the use of submitted data across government to remove duplication**

Ecosystem of Trust pilots are reviewing how supply chain data could replace S&S declarations

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Mandatory New Sanitary and Phytosanitary model (GB) Animal Products and Plants/plant products

Introducing a risk based, targeted approach for imports of all origins

Simplification and digitisation that makes best use of data

SPS goods will be categorised based on inherent risk (high, medium, low)

The level of controls will be appropriate to the risk level

Mandatory New Sanitary Model (GB)

Risk level will be based on inherent risk that the commodity poses to animal health and welfare, food safety, biosecurity and public health alongside risks specific to country of origin

This means a commodity from one country could be low risk but from another country could be medium risk

List should be published end April 2023 for EU goods and end July for RoW

The list will be dynamic

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Mandatory New Sanitary Model (GB)

Indicative listing:

High Risk – live animals, live aquatic animals, geminal products Commodities covered under safeguard measures

Medium Risk – raw, chilled, frozen meat, meat products, dairy, animal by-products for use in animal feed, fishery products and aquatic animals imported as products of animal origin

Low Risk - processed, shelf stable products such as composites and certain canned meat products, processed animal by-products and certain fishery products and aquatic animal products from lower risk countries – must enter via a port of entry with a BCP for that commodity

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The Chartered Institute of Logistics and Transport

Mandatory New Sanitary Model (GB)

If risks decrease or increase causing commodities to move between risk categories traders will be given 3 months notice unless urgent protective action is required

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Mandatory New Sanitary Model (GB)

Percentage of checks per risk category

The table below sets out the controls and indicative checks for each risk category. For example there will be no routine checks on low risk goods.

Consignment Risk (Country risk x commodity risk)	Example Animal Products	Health Certificates	Pre-notification requirements	Indicative checks %			Indicative Checks % Under the current regime
				Doc	ID	Physical	Check rates (across 5 risk categories)***
High Risk	Live animals and commodities covered under safeguard measures	Export Health Certificate required	Full Pre-notification requirements	100%	100%*	100%*	100% Identify 100% Physical
Medium Risk	Raw, chilled, frozen meat/ meat products/ dairy; ABP for use in animal feed; medium risk fishery products imported as products of animal origin	Export Health Certificate required	Full Pre-notification requirements	100%	1% - 30%**	1% - 30%**	100% Identity 15-30% Physical
Low Risk	Processed, shelf-stable products such as composites and canned meat products, processed animal by-products and certain fish products	No Export Health Certificate required	Pre notification data to allow traceability	0%	0%	0%	100% Identity 1-5% Physical

* Certain live animals (e.g. high health equines) may be subject to a reduced level of ID and physical checks dependent upon species but would still be classed as high risk

** Typically 1-30% with many products only requiring 1% identity and or physical checks. However, in some circumstances some products with specific requirements may require up to 100% on ID checks.

*** Risk categories won't be directly comparable, but gives indication of the different approaches taken

Mandatory New Sanitary Model (GB)

Simplified export health certificates to be published by end April 2023

Guidance about Attestations will be removed from the certificate itself into an Annex

RoW will be able to use the simplified EHCs once rollout to EU countries is complete

Rollout of digitised EHC planned for October 2024 for animal products from EU that use TRACES

Digitisation will allow details to be cloned from TRACES to reduce time taken to complete notifications in GB

Third party software will not be required to access this information 14

Mandatory New Phytosanitary Model (GB)

Controls will be applied according to risk category for regulated plants and plant products: Low, medium and high

Some will not be regulated at all, others will be banned with import only permitted by specific derogation and risk assessment

To ensure categorisation remains valid over time there will be robust:

- Monitoring via horizon scanning
- Information gathering
- Targeted surveillance

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Mandatory New Phytosanitary Model (GB)

Plants, plant products and other regulated products are listed in Annex XI, Part A of the retained EU Regulation 2019/2072 ("the Phytosanitary Conditions Regulation")

Where specific risk factors apply, in relation to specific products from specific origins, the frequencies for intervention will be adjusted as appropriate

Items listed in Part C of Annex XI do not require phytosanitary certificates to enter GB and do not require phytosanitary inspection

They are excluded from being part of a risk targeted inspection regime

Electronic phytosanitary (ePhyto) certificates for imports being rolled out from May 2023

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Mandatory New Phytosanitary Model (GB)

Rate of checks under the Border Target Operating Model compared to the current EU regime

Risk Category	Plant / product	🇬🇧 Checks %			Indicative Checks % Under the current regime
		Doc	**ID**	**Physical**	**Check rates** (across 5 risk categories)**
High Risk	Plants for planting – woody and/or for commercial production	100%	100%	100%	100%
	Plants for planting – non-woody and for retail sale as outdoor plants	30%	30%	30%	100%
	Plants for planting – non woody and for retail sale as indoor plants	5%	5%	5%	5%
Medium Risk	Plant products - identified risk linked to a trade	Generally: 5 (RoW*) and 3 (EU)	Generally: 5 (RoW*) and 3 (EU)	Generally: 5 (RoW*) and 3 (EU)	100 (reduced frequency for around 60 trades)
Low Risk	All other regulated plant products	0	0	0	1

* In some circumstances some products with specific requirements will be subject to a higher rate of checks and specific set of processes.
** A more detailed breakdown of the frequencies of plant health import inspections under the current regime is set out in Annex E for reference

Border Control Posts & Control Posts

BCP (previously known as Border Inspection Posts – BIP) will be the location for many of the checks to be carried out but some checks can be completed at Control Posts

BCP are usually located within a port or airport

Ports may need to make changes to staffing levels and infrastructure in order to facilitate the new levels of checks and checks on goods from the EU

If a BCP is not able to effect checks on particular products the Importer will have to route the goods via a different port

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Border Control Posts & Control Posts

Inland Border Control facilities in Kent will provide facilities for goods entering the UK through the Short Straits (Port of Dover and Eurotunnel) and will be operational from the introduction of checks in January 2024

Plans are being developed for Border Control Posts to provide facilities for goods entering the UK through the ports in Holyhead and South West Wales

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Border Control Posts & Control Posts

The proposal is to administer a Common User Charge on each consignment which enters through Port of Dover and Eurotunnel that is eligible for SPS checks

The charge would apply to all eligible consignments, whether or not they are selected for a BCP inspection

The indicative Common User Charge rate is estimated to be in the region of £20-£43

HMRC is also exploring options for provision of its inland border facility services on a commercial basis and will engage stakeholders on these plans as they develop

Border Control Posts & Control Posts

CP are inland inspection facilities where checks can take place on some plants and plant products under customs supervision

Goods moved to a CP are under customs control and cannot be opened until the inspector (or authorised operator) is present

Trusted Trader Schemes – Sanitary & Phytosanitary Goods

Pilots of Trusted Trader assurance schemes that provide credible evidence to support facilitations

Pilots of Trusted Trader Schemes will be co-designed with industry throughout 2023 before go-live in January 2024 – intention to be as ambitious as possible to maximise benefits

Separate pilot schemes for plants/plant products and medium risk animal products

Some high risk food and feed of non-animal origin may be considered for inclusion in the future

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Trusted Trader Schemes – Animal Products

Data, technology and trusted relationships will be used to:

- **Deliver robust up-stream compliance**

- **Permitting processes to be moved away from the border**

- **Improve the flow of goods**

- **Protect public health & food safety**

- **Reduce burdens on industry**

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Trusted Trader Schemes – Animal Products

Vetted and Monitored Traders invited to take increased accountability for biosecurity and food safety

Two Trusted Trader Schemes will be assessed against 5 high level principles:
1. **Protect or enhance domestic biosecurity animal and public health**
2. **Maintain export markets**
3. **Minimise burdens and cost to industry**
4. **Provide benefits and reduce costs to government**
5. **Accessible to as many sizes and types of business as possible**

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Trusted Trader Schemes – Animal Products

The Accredited Trusted Trader Scheme

Frequent importers of products of animal origin and animal by-products

Reduce need for routine checks physical checks at BCPs by taking responsibility for carrying out routine checks and sampling themselves at their premises

Pilots expected to run for 6-12 months

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Trusted Trader Schemes – Animal Products

The Accredited Trusted Trader Scheme

Pilot scheme will work out final details but minimum membership criteria would be:

- Registered business in the UK for customs purposes
- Good compliance history
- Named responsible person for identification/monitoring & management of risks
- Implement government produced standard operating procedures
- Have bio-secure premises and infrastructure
- Provide end-to-end supply chain assurance
- Have suitably trained staff who can act independently

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Trusted Trader Schemes – Animal Products

The Technology Assurance Scheme (TAS)

Lighter touch scheme

Built on principals of Ecosystem of Trust pilot scheme

Utilise data already collected by businesses and access additional Data using specific devices such as digital seals & temperature trackers

Enable a proportionate reduction in physical checks

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Trusted Trader Schemes – Animal Products

The Technology Assurance Scheme (TAS)

Pilot scheme will work out final details but minimum membership criteria would be:

- **Registered or approved by their local authority, the Food Standards Agency (Foods Standards Scotland) as a food business or registered with, or approved by Animal Plant and Health Agency (APHA) as an animal by-product business**
- **Have no adverse Sanitary or Phytosanitary compliance history**
- **Have a record of pre-notifications since January 2022**
- **Have no adverse customs compliance history**

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Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS)

A trader, with appropriately trained personnel and internal control systems, can achieve recognition that their level of expertise is sufficient to perform physical and identity import checks

The Trader will have their premises designated as a Control Point (CP)

Authorised Operators will have flexibility to conduct the checks at their business premises (designated Control Point) at a time that suits them

There will be a fee to recover the cost of the scheme, such as audits and training

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Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS)

The eligibility criteria will include:

- **UK registered business established in the UK for customs purposes**

- **Registered with the relevant UK plant health service as a professional operator**

- **Entering into an agreement with Animal and Plant Health Agency (APHA) and/or Science & Advice for Scottish Agriculture (SASA)**

- **Having Designated 'Authorised' and 'Responsible' Person:**

  - The Authorised Person conducts the checks

  - The Responsible Person will have board level authority and act as the point of contact and have overall accountability for the organisation's status

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Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS)

- Documented internal processes for inspection and management of biosecurity risks
- Bio secure premises (control point designation and custom authorisation)
- Training on conducting plant health checks, including detection and preliminary identification of quarantine pest and disease
- The business will document how any conflicts of interest will be managed internally and how risks to impartiality will be minimised

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Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS) responsibilities will include:

- **Ensuring the supplier has necessary phytosanitary certificates;**
- **Submitting a pre-notification (uploading a scanned copy of the phytosanitary certificate) and customs declaration;**
- **Declaring goods for inspection; and**
- **Performing risk-based physical and identity checks and report the outcome of those inspections to the relevant UK plant health authority**

The AOS and Responsible Person will sign a code of Ethics and have a logo as an indicator of compliance

Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS)

Compliance measures will be geared towards those who, for instance,

- **try to destroy consignments without reporting the pest or disease to the Animal and Plant Health Agency/SASA**
- **falsify inspection records or distribute the consignment before completion of inspections, in the hope of avoiding negative consequences for the business**

This links with the 2025 Border Strategy and the move towards responsive regulation, allowing for differentiated (responsive) enforcement based on the profile and behaviour of the business in question

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Trusted Trader Schemes – Plant & Plant Products

Authorised Operator Status (AOS)

To take part in the pilot Traders will need to have already been authorised as a Control Point

Two stage pilot:

- **The first stage will involve trialling and testing individual components of Authorised Operator Status, including testing elements such as the training platform for Authorised Operators and aspects of the auditing process. This is planned for Autumn 2023.**

- **The second stage will be a full end-to-end pilot will be initiated from January 2024**

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Implementation Timeline

October 2023

- Introduce export health certificates and phytosanitary certificates for medium risk animal products and phytosanitary goods imported from the EU

- Begin sample documentary checks on medium risk goods from the EU, but there will be no new routine controls undertaken on these goods at the border, so initially there will be no charges for documentary checks or holds for inspection

- Accept submission of simplified export health certificates compared to those currently used for Rest of World trade

- The new simplified export health certificates for products of animal origin will be finalised and published by the end of April 2023, with certificates for animal by-products available shortly afterwards

- Rest of the World trading partners will be able to use the simplified export health certificates once the rollout to EU countries is completed

Implementation Timeline

January 2024

- **The new checks at the border on medium risk EU origin goods will be introduced**

- **The requirements for import controls on low risk plants and plant products from non-EU countries will be removed and they will not be introduced for the EU**

- **Health certificates and routine checks at the border will no longer be required for low-risk imports from non-EU countries with the exception of intelligence-led interventions on low-risk animal products**

- **All goods to which these import health controls apply will be required to enter via a point of entry that has the relevant Border Control Post or Control Point designation for those goods**

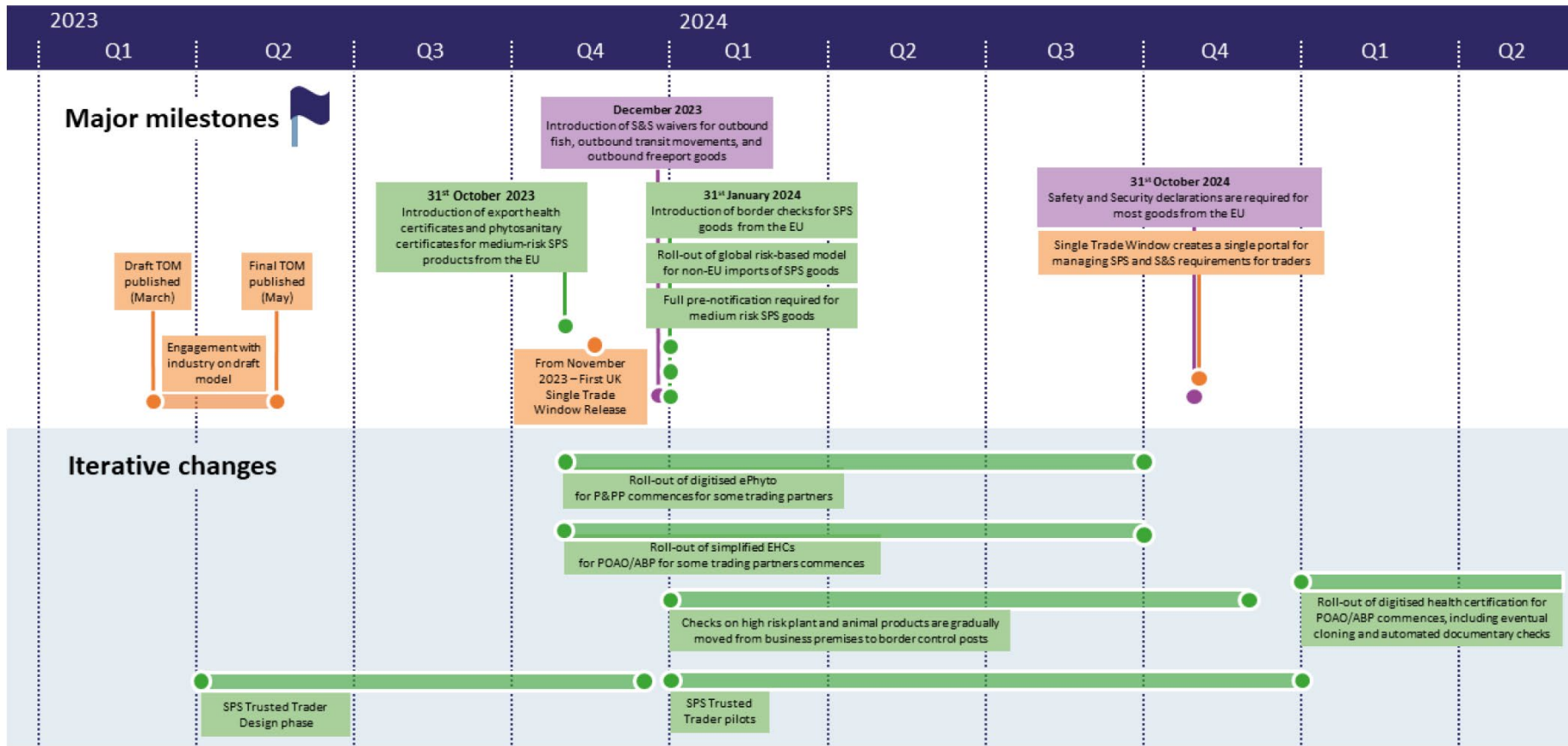# Implementation Timeline

October 2024

Further simplify traders' management of Sanitary and Phytosanitary requirements, with the introduction of the UK Single Trade Window removing duplication across pre-arrival datasets where possible

All checks on live animals to have moved from their point of destination to Border Controls Posts, as those will have become operational

Timeline A: Summary timeline for implementation of the Border Target Operating Model

Questions?

Act Now!