

Call for Evidence: Priorities for a UK-EU SPS agreement

Response submitted by the British Horse Council

The British Horse Council is Community Interest Company (CIC) incorporated in 2018, which engages with ministers and government officials to find collaborative solutions to challenging matters including equine identification, abandoned horses and ponies, disease surveillance and other areas affecting the UK's horse industry. We host two wider stakeholder meetings each year which provide a forum for discussing the key issues affecting the UK's equine sector, as well as fortnightly Directors' meetings.

This response cross refers to others from our sector where detail has been supplied. This submission highlights key areas for consideration.

If we were to highlight a pivotal point, it would be:

“We cannot stress enough how critical it is that no new regulation be developed without industry input. We have considerable experience of this having been the case when Border Control Posts (BCPs) were originally designed under the Border Target Operating Model (BTOM) in isolation from industry, wasting millions of pounds of Government money”

What is a realistic timeline for the negotiation and implementation of an SPS agreement?

1. Since the UK left the EU, the cost, administrative requirements, lack of certainty and continual shifting of border control requirements have taken their toll on the equine sector. They have resulted in a reduction in trade, valuable breeding and competition stock being moved to the continent, breeders, riders and trainers moving their businesses abroad and an overall sizeable atrophy of the sector. Until there is a new agreement, significant compromises and marked welfare concerns persist and we are supportive of a positive balance between a good deal and a timely deal.

Aspiration:

- Consultation: 2025 -2026
- Negotiation and drafting: 2026 - 2027
- Implementation: 2028

What opportunities and risks are posed by the introduction of dynamic regulatory alignment with the EU?

The British Equestrian Trade Association (BETA's) response highlights the opportunities and risks specifically for manufacturing, safety certification and equine food/feedstuffs.

Opportunities

2. Realigning the UK with Europe such that routine physical border checks are not needed for equines would save cost, reduce business uncertainty, reduce delays (with associated transportation stress and animal welfare consequences) and re-access, without barriers, EU equestrian competition, racing, sport and breeding markets all of which have suffered an evidenced downturn since the UK left the EU.
3. All incoming movements should be digitally recorded, with data sharing agreements between the EU and the UK negotiated early. This will enable intelligence led physical

checks of incoming consignments either at ports (if portal infrastructure remains economically viable), at interim points on a journey or at destination. If there can be a mechanism to identify High Health horses (as would have been the case under the former Tripartite Agreement (2014)) then there could be fewer checks for this distinct population than for the wider population and mixed loads.

4. Ability to export fresh chilled germinal products to EU again. Due to the short viability window of this product, trade ceased immediately in January 2021 because of slow customs processing. This had a devastating effect on this specialist trade and the UK breeding sector.
5. Opportunity to simplify Export Health Certificates (EHCs) or remove and replace with digital movement notifications using IPAFFS/EHCO or revert to the use of TRACES NT. This will reduce costs for traders and onerous requirements on vets (see evidence within British Veterinary Association submission) to produce EHCs. We appreciate that there is likely to be a fee to use TRACES NT, part of which could be to reconfigure functionality to meet the UK's needs.
6. Negotiate an Application Programming Interface (API) from TRACES NT to the UK's Central Equine Database to enable better traceability within the UK (as called for in the National Audit Office report 2025).
7. Under the requirement to dynamically align, the UK would need to mandate the (digital) registration of horse keeping premises which would fundamentally underpin traceability. For avoidance of doubt, the current County Parish Holding (CPH) system is not fit for this purpose.
8. Since the UK-EU Summit Common Understanding covers all regulation relating to live animals, we hope that this includes access to the EU Animal Disease Information System (ADIS), enabling relevant data to be shared between the UK and the EU in the event of a disease outbreak or suspicion of an outbreak.
9. Mutual recognition of qualifications. The Common Understanding lays the foundation for negotiation of mutual recognition of standards for veterinarians. This would permit veterinarians to work in each other's countries, attracting qualified professionals into countries where there are shortages. A 2024 workforce model from the Royal College of Veterinary Surgeons (RCVS) noted that while the overall supply of vets grew to 90% of total demand in 2023, it is not projected to fully meet demand within the decade.

Risks

10. That secondary legislation to enforce the Animal Welfare (Livestock Exports) Act 2024 may not be enacted. An agreement must be reached that will enable the UK to proceed with this ban on live exports to slaughter; there is a precedent for this to be the case within the new EU-Switzerland food veterinary agreement, allowing Switzerland to maintain distinct rules on certain animal welfare standards.
11. That we revert to the use of TRACES NT to record cross border movements without any mechanism for inclusion of a High Health category of horse. The High Health category of horse is desirable for the UK but does not currently exist in EU legislation and is not currently supported by TRACES NT.
12. That UK authorities do not have access to TRACES NT. Access would be critical to stemming poor welfare illegal "horse smuggling" border crossings from the island of Ireland to the EU mainland using the GB landbridge.
13. That consent for an API linking TRACES NT to the UK's Central Equine Database (to record inbound movements for traceability purposes) will not be granted. This would be

a missed opportunity and would damage the UK's ability to prevent spread of infectious disease and limit our ability to maintain high welfare standards.

14. That, if the UK aligned with proposed EU welfare in transport regulations, there would be considerable impact on breeding and movement for sales, without any welfare benefit. The key anomalies are journey and rest times (21hr journey time – 24hr rest – 21hr journey time - 7 day at destination) and external temperature requirements; these are currently poorly thought through in relation to horses.
15. That the critical move from paper based to digital identification for horses is delayed by the SPS negotiations. The UK is currently working on a domestic co-design solution to these proposals supported by Baroness Hayman of Ullock, Parliamentary Under-Secretary of State, DEFRA. The EU still currently mandates the use of single lifetime identification (paper) documents, the UK's plans to advance this to digital are well underway and should not be compromised.

How should traders, producers, businesses and policy makers prepare in sectors where regulatory divergence already exists or may emerge, such as in precision breeding, animal welfare and crop protection?

16. The UK will seek to retain its higher equine welfare standards as outlined in other sections. These will include our plan to lay secondary legislation to enact the Animal Welfare (Live Exports) Bill 2024.
17. The UK may seek to diverge from EU welfare in transport proposals which would result in significant impact without welfare benefit in sectors such as Thoroughbred breeding. A more detailed account of this matter has been provided in the British Thoroughbred Racing and Breeding Industry response.
18. A more detailed case encompassing welfare consequences has been provided by World Horse Welfare.

How should the UK Government engage with industry stakeholders and devolved administrations to ensure the agreement aligns with wider agri-food and environmental goals?

19. We recognise Cabinet Office's coordination role in these negotiations. We propose structured engagement via British Horse Council nominated subject matter experts - with clear terms of reference and confidentiality provisions. We propose time-bound working groups for data, High Health horses, and germinal products. These recommendations draw on lessons learned from prior BTOM design phases, avoiding costly and time-consuming re-work.
20. We cannot stress enough how critical it is that no new regulation be developed without industry input. We have considerable experience of this having been the case as the Border Control Posts (BCPs) were originally designed under the Border Target Operating Model (BTOM) in isolation from industry, wasting millions of pounds of Government money.
21. Devolved authorities should be involved from the outset.

What could the implications of an SPS agreement for trade and border controls be, including border infrastructure, resources, biosecurity, trade friction, growth and the treatment of imports from non-EU countries?

22. Treatment of imports of live equine animals (equines) from non-EU countries should remain unchanged from the specification in the BTOM because the SPS Agreement is likely to require that certain provisions of EU law, including emergency measures and those applicable to the entry of animals and products of animal origin into the EU from the rest of the world, are directly applicable to the UK.
23. Impact on border crossings to and from the EU should be minimised. Routine physical checks at borders could be dispensed with provided that:
24. Pre import (and export) notifications systems (IPAFFS, EHCO or TRACES NT) API into the UK Government's Central Equine Database.
25. TRACES NT, ADIS and the UK's Equine Infectious Disease Surveillance system (EIDS) should be linked to the Central Equine Database to create end to end equine identification, location recording, movement traceability and the capacity to monitor and manage disease centrally, especially for emerging disease threats as identified by the 2025 National Audit Office report. This could initiate a wider cross departmental intelligence sharing network helping to combat elements of organised crime, tax evasion and smuggling.
26. This will mean that imported equines can be centrally identified (temporarily for residents of 30 days or less and permanently for horses entering the country for 90 days or more), their destination recorded, intelligence led checks implemented accordingly and biosecurity better supported.
27. All equine movements should be centrally recorded for the purposes of traceability. Geolocation and recording of movements will be key to dynamic alignment. We repeat that the current County Parish Holding (CPH) system is not fit for this purpose.
28. The EU Deforestation Regulation (EUDR) requires traceability and due diligence for cattle and cattle-derived products entering the EU market and geolocation data of the land where cattle are raised is a key requirement. Whilst this does not apply to equines, we can see how geographical data driven compliance will be pivotal to alignment across all kept animal species.
29. The Republic of Ireland's Department of Agriculture, Food and the Marine (DAFM) is already well ahead of the curve in implementing these changes as announced on 20/8/25.
30. With regard intelligence led physical compliance checks, these could be carried out at destination, which is currently the case. It's desirable to have intelligence led compliance and welfare checks within the import chain. However, the likely frequency of these does not indicate the running of a "full" BCP infrastructure with associated costs, which will be passed on to industry once again elevating costs and restricting trade.
31. BCP checks for imports of fresh chilled equine germinal products (semen, oocytes and embryos) should be discontinued. Physical checks at borders, along with all associated infrastructure and running costs, could be dispensed with provided that:
32. Pre import (and export) notifications systems (IPAFFS & EHCO, or TRACES NT) API into the Government's existing Central Equine Database (given that the development of the Single Trade Window has been paused) to ensure full traceability of these germinal products.
33. Inseminating vets (or vets carrying out ova or embryo implants) are registered with RCVS and physically check and certify the identity of the germinal products.

34. Derogated equine professionals (AI Technicians) in the case of semen only, physically check and certify the identity of the germinal products at point of insemination and approval mechanisms are developed to allow this to happen.
35. BCP checks for imports of frozen equine germinal products (semen, oocytes and embryos) should be discontinued. Physical checks at borders, along with all associated infrastructure and running costs, could be dispensed with provided that an approved Defra Approved AI centre¹ certifies their arrival and storage.

How might an SPS agreement affect the UK's internal market, particularly considering regulatory divergence across the devolved nations?

36. From an equine ID/traceability perspective, it will ensure that all of the UK is required to adopt the EU Animal Health Law and associated requirements - currently only Northern Ireland has to implement these requirements in line with the Windsor Framework.
37. A UK view would be the ideal, and engagement with Devolved authorities from the outset will be pivotal. Devolved nations may be constrained in different ways (by their own parliamentary or election process and intervals, by finance or by other significant factors) so it may be feasible to write into regulation that they will align with UK view within a defined timeline. On that point, paragraph 3 of the Negotiating Mandate states that the principle of dynamic alignment “should ensure that identical rules within the scope of the agreement are simultaneously applied.”
38. Ideally the negotiations should not be delayed so that each nation can comply with simultaneous application. Perhaps there is scope for some flexibility provided that a confirmed compliance date can be provided.
39. Digital registration of equine keeping premises is already functionally built into the UK Central Equine Database and implementation is planned by Northern Ireland.

What impact could the proposed SPS agreement have on upcoming Defra agri-food and environmental strategies, such as the Land Use Framework, Food Strategy, Farming Roadmap, and efforts to improve farming profitability and sustainable growth?

40. A response for this question has been included within the British Equestrian Trade Association (BETA) submission.

References

UK-EU Summit Common Understanding <https://www.gov.uk/government/publications/ukey-summit-key-documentation/uk-eu-summit-common-understanding-html>

UK-EU SPS Agreement Negotiating Mandate COM (2025) 408 final: Recommendation for a COUNCIL DECISION authorising the opening of negotiations between the European Union and the United Kingdom of Great Britain and Northern Ireland on a common sanitary and phytosanitary area between the European Union and the United Kingdom in respect of Great Britain and to link the United Kingdom and the Union's greenhouse emissions trading systems https://eur-lex.europa.eu/resource.html?uri=cellar:56c7c27f-6221-11f0-bf4e-01aa75ed71a1.0001.02/DOC_1&format=PDF

¹ Approved in line with the requirements of Directive 92/65/EEC: Existing EHC Rest of world compliant and/or where relevant Approved in line with the requirements of Commission Delegated Regulation 2020/692: New AHR EHC compliant