



Phytosanitary matters that impact access to plant material for DUS examination

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Animal &
Plant Health
Agency

Recurring themes – Import & Export of Seed and Plant Material -

- Courier-related storage delays and access issues
- Lost Consignments
- Incorrect or lack of Documentation (Phytosanitary Certificates)
- Incorrect naming and/or EPPO codes (European & Mediterranean Plant Protection Organisation)
- Incomplete or incorrect import declarations (Import of products, animals, food and feed system-IPAFFS)
- Border control post (BCP) inspection backlog due to BTOM (Border Target Operating Model)
- EU Import Changes (e.g. TRACES NT (TRACES NT trade platform allows authorities in GB to issue the PC information directly into the TRACES NT platform, providing a safe and secure method of transmitting phytosanitary information to the EU Member States (MS). /Responsible for Load Validation /Declaration of import)
- UK Customs hold ups

Export delays due to CHED (Common Health Entry Documentation)

Seed being sent to the EU being delayed because the **consignee was not registered/validated in TRACES NT**, blocking release.

UK Border Inefficiencies

Border Target Operating Model (BTOM) has caused inefficiencies and delays in import material reaching its destination – Importers have experienced inconsistent checks at varying PoE (Point of Entry), additional paperwork requirements, and increased costs.

Customs Issues

UK importers have experienced destruction of seed material by Border Control officials with no clear explanation. When no additional source material is available this can cause breeders a problem.

We have often experienced confusion on who has a consignment on hold, Customs? PHSI? (Plant Health and Seeds Inspectorate) Couriers?

Export Delays due to 'Declaration of Import'

"Declaration of Import" requirement, adding extra complexity and causing **delays for UK organisations exporting seed into the EU.**

Seed destined for the EU had been **held since 21 January**, with a new declaration of import **€137 fee**

Import Delays

Seed from **France stuck at Stanford le Hope (Essex UK)** and Seed from **Germany stuck at Castle Donington (Derbyshire UK)**. These delays were due to APHA import backlogs and UPS storage fees

We quite often experience breeders travelling to countries to collect seed to avoid these customs and courier delays

Seed Delayed Due to Missing/Incorrect TRACES or 'Responsible for the Load' Registrations

Delays due to EU consignee requirement for '**Responsible for the Load**' in TRACES NT before import documents (CHEDPP) can be processed. Often this information is not correctly given (if at all)

Courier Issues

Courier choices can adversely affect clearance times, and consignments can even be **lost or destroyed during handling**.

We have often experienced confusion on who has a consignment on hold, Customs? PHSI? Couriers?

Additional Testing requirements on UK entry

Additional testing required when already tested causing further delays (e.g. seed tested in EU for Brown Tomato Rugose Virus and then tested again coming into GB having already passed in the EU).

2025 EU non-compliances (Seeds only):

2025	Total EU Notifications for Seeds	Comments
Jan	9	1 CHED Entry Error by Agent
Feb	6	
Mar	54	
Apr	62	1 EU requested incorrect ADs
May	7	
Jun	6	
Jul	2	
Aug	2	
Sep	3	
Oct	6	1 Toy company
Nov	0	
Dec	0	
TOTAL	157	

Potential Consequences and Impacts

- Unavailability or delayed release of seed/test material or field sites causes the drilling/sowing window to be missed, resulting in loss of one full trial cycle, delaying variety advancement and market launch by ≥ 12 months.
- Incomplete/late data packages and/or non-compliant plots lead to delays or rejection in VCU (Value for Cultivation and Use) and DUS (Distinctness, Uniformity, Stability) applications.
- Risk of missing seed submission deadlines due to delays
- Repeated missed deadlines, document errors, and late data erode the UK's reputation as a reliable partner in international collaborative testing.
- Compounded trial, logistics, and regulatory slippages elongate the time-to-registration, creating gaps and potential revenue returns.
- Potential loss of trial material from non-conformity (documentary/entries), leading to trial delays or failure and incurring additional costs for replacement and penalties.

How do we resolve such issues?

- SPS Agreement!

The new system is expected to reduce paperwork and remove many of the checks and costs that businesses currently face when exporting or importing agri food goods.

This deal will open up opportunities for trade to flow faster, strengthening supply chains and food security.

The changes are expected to affect around 500,000 businesses, including many that operate entirely within Great Britain and do not currently trade directly with the EU.

If agreed, the changes could remove fees for Export Health Certificates, Phytosanitary Certificates and inspections.

The agreement is also expected to simplify the movement of most agri food goods between Great Britain and Northern Ireland which could help protect consumer choice and strengthen the UK internal market. Faster movement of fresh goods would help supply chains and support food security.

The agreement is expected to take effect from mid-2027.

Thank You for Your Attention

