

# Border Target Operating Model – One Year On

FSA 25/03/04 - Report by Anjali Juneja and Jane Clark

## 1 Summary

1.1 The Border Target Operating Model (BTOM) is designed to put in place a new process for managing our global imports, particularly food, feed and plants, following our departure from the EU. The BTOM represents a shift in how Great Britain manages the importation of Sanitary and Phytosanitary (SPS) commodities from around the world.

1.2 The development of the BTOM was set up as a cross-government programme, led by Cabinet Office although their role has now completed. The role of the FSA has been to provide input on food and feed safety in support of the new risk model and to ensure that protecting consumers was a key consideration as the BTOM was designed and implemented. Defra is the main lead department for implementing the SPS elements of the BTOM and they have worked closely with the Welsh and Scottish Governments. The FSA has also worked on a three-nation basis in all our work across both central UK government, devolved governments and Food Standards Scotland (FSS).

1.3 This report provides an overview of the BTOM's implementation over the past year, highlighting key milestones, challenges, and future direction.

1.4 Following consultation with the FSA's Chief Scientific Adviser, our overall qualitative assessment is that the implementation of the BTOM so far has contributed positively to our ability to manage risks posed to food and feed safety from commercial imports from the EU and has maintained the assurances that already applied to Rest of World (RoW) imports.

1.5 However, BTOM implementation is not complete, and the Board is therefore asked to **note this report** and:

- **endorse the FSA's ongoing BTOM related work** detailed below using our agreed guiding principles (Annex A) - this comprises:
  - ongoing engagement with Defra, Welsh Government, Scottish Government and FSS to reach a consensus on how to proceed;
  - working across GB governments on legislation, systems and data;
  - continuing to work towards implementing future risk category changes;

- continuing to effectively control RoW imports.

1.6 The Board is also asked to note the FSA's work with Defra, Border Force, Welsh Government, DAERA, FSS and Port Health Authorities (PHAs)/inland Local Authorities (LAs) to combat the distribution and sale of illegally imported products.

## 2 Discussion

2.1 The Cabinet Office was responsible for coordinating cross government activity to design and develop the BTOM and other departments, including the Home Office and HMRC, have also been closely involved in the policy work and elements of the BTOM unrelated to SPS. Defra is the lead department for the development of the SPS measures, and because much of the work crossed into areas of devolved competency, have worked closely with the FSA, FSS and Welsh and Scottish Governments.

2.2 From the outset there was a strong drive from central government to minimise the friction for businesses. We balanced this against our objectives of protecting the consumer, applying the principles agreed by the Board (see Annex A).

2.3 The FSA and FSS are responsible for carrying out a regular analysis of the safety risks posed by food and feed commodities and, following a risk management process, supplying recommendations for the country/commodity BTOM risk categories. These dictate the controls that apply before and at the border. More detail about the risk model can be found in the June 2023 Board Paper: <https://www.food.gov.uk/board-papers/border-target-operating-model-update>

2.4 The BTOM categorises sanitary items, such as products of animal origin (POAO), for example, meat, dairy, and eggs; animal by products (ABP) such as pet food; and phytosanitary items such as plants and plant products with the FSA and FSS responsible for food and feed safety. The FSA and FSS also continue to deliver the policy for control of high-risk foods of non-animal origin (HRFNAO) through PHAs and local authorities. HRFNAO rules are set out in legislation and, although similar principles to the BTOM apply, these requirements sit outside the BTOM.

2.5 This paper concentrates on the development and implementation of the elements of the BTOM relating to POAO and ABP, where the FSA's key role and responsibility relates to food and feed safety.

### **BTOM risk categorisation**

2.6 The BTOM is underpinned by a new global risk-based process that can adapt to changes in risk both for the country of origin and the specific commodity. This model is known as IDM+ and it is a development of the existing International Disease Model, a system designed identifying and assessing threats posed to animal health.

2.7 With the addition of a food safety layer supplied by the FSA and FSS, it delivers a flexible and adaptive model to assign BTOM risk categories that can vary according to commodity and origin – for example chicken products from Chile may have a different BTOM risk category to those from Thailand. It is applied globally with the EU treated as a single entity in line with our treaty obligations.

2.8 BTOM risk categories are split into high, medium, and low, with the medium risk made up of three subdivisions with varying physical check rates. Only live animals and germinal products fall into the high-risk category.

2.9 The FSA and FSS, jointly apply a real-world sense check to the risk scores generated by the model. This enables us to manage the risk in a proportionate manner and takes account of additional data sources, including the latest data available on border notifications, non-compliance and incidents to assign the food safety recommendations BTOM risk categories. We have now completed four runs of the IDM+ model, adding improvements at each stage. Only minor differences have been identified to the risk and check rates over the four runs for both EU and RoW commodities which indicates **broadly stable risk levels on food and feed commodities since the introduction of the BTOM.**

### Activity to date

2.10 Prior to the implementation of the BTOM there were no checks in place for **EU food and feed** entering Great Britain. Until the BTOM came into effect, **RoW commodities** continued to be subject to the same controls and levels of checks that were in place when we left the EU. This included the need for prenotification, documentary and identity checks, and a varying proportion of physical checks dependent upon the commodity.

2.11 The BTOM has been implemented in stages as follows:

**1 January 2022** – The introduction of prenotification of imports from the EU of products of animal origin and animal by products as well as plants and plant products.

**31 January 2024** - The introduction of Export Health Certification on imports of medium risk animal products, plants, plant products and high-risk food and feed of nonanimal origin **from the EU**. The removal of pre notification requirements for low-risk plant and plant products from the EU.

**30 April 2024** - The introduction of documentary and risk-based identity and physical checks on medium risk animal products, plants, plant products and high-risk food and feed of non-animal origin **from the EU**. The removal of Export Health Certification and routine checks on low-risk animal products, plants, plant products from the **Rest of World** as well as changes in physical and identity check levels on medium-risk **Rest of World** animal products.

**31 January 2025** - The requirement for Safety and Security declarations for imports into Great Britain from the EU or from other territories where the waiver applies came into force from 31 January 2025 as set out in the Target Operating Model. Safety and security declarations are primarily used by HMRC, and the Home Office so are not discussed in this paper.

**25 February 2025** – The requirement for movements of non-qualifying Northern Ireland Goods sent from Northern Ireland to meet the requirements of the BTOM. Qualifying Northern Ireland Goods continue to benefit from unfettered access to the GB market as set out in the Windsor Framework [\(footnote 1\)](#).

### Changes for EU imports

2.12 The BTOM meant significant changes for EU imports. EU commodities were not subject to border controls while the UK was a member of the single market and until the BTOM was implemented. The BTOM means that all eligible POAO and ABP imports from the EU are now required to be pre-notified for import to GB and this provides data to support traceability and allows port authorities to target their checks based in expected arrivals. Export Health Certification has been introduced for medium and high-risk commodities which provides independent official certification that the goods were produced and handled to the UK's standards.

### Changes for Rest of World imports

2.13 In line with IDM+ model outputs and risk management steps, a number of commodities moved to the BTOM low risk category and no longer require certification or routine identity and physical checks. Only a small proportion of the RoW commodities have been affected by this, and the vast majority continue to require Export Health Certification and routine checks at Border Control Posts (BCPs).

2.14 100% documentary checks remain in place but, identity checks have been reduced from 100% to align with the rates of physical checks carried out in the BCP. This followed analysis that showed ongoing high compliance rates for identity checks.,

2.15 These changes for RoW imports only apply to commodities that already have completed the relevant Market Access assessment. The implementation of the BTOM has no impact on this process.

### 3 BTOM implementation

3.1 From the end of January 2024, the first phase was delivered on time with the rollout of **Export Health Certificates for EU imports** as well as enhanced enforcement of the pre-notification for imports to GB. We know that the volume of errors was high at first and showed a steady decline over the first three months of implementation. These were mostly administrative errors as businesses learned how to complete forms and provide the relevant information: no material impact on food safety was seen. It is also expected that some errors will continue to be identified as many businesses only occasionally interact with GB's import system, though the wide use of customs agents will mitigate this.

3.2 The second phase, the introduction of physical checks for **EU imports as well as the extension of the new risk model to Rest of World countries**, commenced at the end of April 2024.

3.3 **The changes for RoW consignments were fully implemented on 30 April 2024.** This is because BCPs handling RoW consignments were already delivering these checks and only needed to adjust their existing processes rather than implement entirely new ones.

3.4 **The changes for EU consignments were planned by the previous Government to be a graduated process** and were expected to be completed by the end of 2024, however implementation remains ongoing. At times, we know there have also been pauses to some routine checks due to critical IT systems failures where Defra has taken steps to balance the impact on trade (e.g. lengthy delays at the border) with their assessment of the biosecurity risks. Defra is in the process of replacing the key system involved and working very closely with HMRC: the new system is planned to be in place in early 2025/6.

3.5 Defra has also written to PHAs in England to ask them to maximise the use of their resources, while some continue to recruit their teams. In addition to the vehicles directed to BCPs by the automated system that selects consignments for checks, PHAs have been asked to identify additional consignments for checks on a risk led basis. These vehicles are then required to report to a BCP for identity and physical checks. Defra is also working with PHAs to understand what further guidance and support could be provided

3.6 There are currently different arrangements in place for consignments that arrive from the island of Ireland into **West Coast Ports**. There are various routes available with commercial shipments able to arrive at any of the following: Fishguard, Pembroke Dock, Holyhead (Anglesey), Liverpool, Heysham and Cairnryan. The UK Government, together with the Scottish and Welsh governments, decided that physical checks on goods arriving from the island of Ireland at any of these routes would not be implemented until BCPs are active at all relevant ports to avoid potential trade diversion by businesses.

3.7 There is a theoretical risk that EU consignments could transit Ireland to avoid BCP checks but this is potentially mitigated by the likely length and cost of journeys making this uneconomical and the ability of local authorities to take appropriate action, inland, if needed. With our close working relationships with the Food Safety Authority of Ireland (FSAI), we also recognise that goods produced in Ireland pose low risk levels.

3.8 Currently, the numbers of checks completed, and issues identified under the BTOM, cannot be accurately reported due to limitations in data availability and quality. Defra is currently working to compare data sets (local and national) and to assess data quality. Following that work, they have said they will put a plan in place to address any issues identified, either through technical changes to systems such as IPAFFS or providing further support to users on improving data quality.

### **Case studies**

3.9 The case studies below provide some feedback and opinions on the implementation of BTOM controls provided by officers in PHAs and have been anonymised for this paper.

#### **A West Coast PHA**

3.10 This PHA expressed concerns about what they saw as additional complexity in enforcement and that documentary checks may be completed after a consignment has left the port meaning that enforcement becomes an inland local authority responsibility.

3.11 Concerns were also raised about an increase in administrative work and inefficiencies in the new process linked to the resources available to carry out the checks being impacted by reductions in government funding.

#### **An East Coast PHA**

3.12 This PHA flagged their concerns about a significant increase in workload for EU goods caused by the BTOM without adequate resources to manage it effectively. They pointed to an incomplete change programme, suggesting that the BTOM has led to shifts in trade flows and gaps in surveillance.

3.13 They argued that compliance issues were resulting from gaps in knowledge about the requirements for some controlled consignments and suggested that some businesses may be making use of simplified customs procedures to avoid controls.

3.14 They also point to additional pressure on staff resulting from new risk classifications and inspection workflows requiring additional staff training to ensure smooth implementation.

### **Stakeholder views**

3.15 Since the first draft was published in April 2023, the BTOM has received considerable attention from stakeholders that range from large supermarkets, wholesalers, and trade associations to farmers groups, public health professionals, and others. This was explored at the oral evidence session of the Environment, Food and Rural Affairs Cross Party Committee on 4 February 2025 which heard criticism of how the BTOM has been implemented. A transcript of the hearing is available at the [Committee's website](#).

3.16 Following the hearing the Chair of the Committee wrote to Ministers to ask further questions about the concerns raised by the witnesses. The [letter](#) and [response](#) from Baroness Hayman have now been published.

## **4 Legislation**

4.1 New primary legislation had originally been planned to be in place in 2023 for the implementation of BTOM but there was a move away from having a Borders Bill and the General Election added further delay.

4.2 Specifically, this has delayed the timetable to deliver the legislation required to enable us to make changes to BTOM risk categories on an administrative basis and currently the Government has to legislate each time a change is needed. As a result, the legislation is now not likely to be in place until mid to late summer 2025 or later.

4.3 Importantly these delays do not prevent us from introducing urgent safeguarding measures where there may be immediate risks to food and feed safety.

4.4 Reassuringly, our regular runs of the IDM+ model, using increasingly rich data sets, indicate that the food and feed safety risks remain broadly stable. This means that we do not consider that the issues around updating the risk model currently pose a risk to consumers, although we are committed to keep this under review.

## 5 Trusted Trader

5.1 One of the proposals in the BTOM was to create a trusted trader pilot scheme for SPS importers, limited initially to the EU.

5.2 Three pilots were proposed for importers of POAO. These were:

(a) the **Certification Logistics Pilot** (CLP) which would allow importers to split loads in a distribution hub under controlled conditions for onward travel to the UK without requiring fresh export health certification;

(b) the **Checks Away from the Border** (CAB) pilot allowing businesses to carry out border checks at their premises; and

(c) the **Journey Assurance Model** (JAM) which was designed to obtain assurance from commercial data, such as smart seals, temperature monitoring and GPS tracking.

5.3 The CLP pilot was launched at the end of January with ten participants but by the end of 2024 only four businesses were actively using the CLP with others either pausing their use of the scheme or being off boarded for various reasons. The FSA played a key role in the audit of premises across Europe as part of pilot monitoring.

5.4 Defra has led a review of the CLP which concluded that the pilot has broadly met the aims of providing benefits for businesses whilst protecting biosecurity and public health. The FSA was involved in the assessment and agreed, noting that there was significant oversight and audits of business facilities during the pilot to support these conclusions. The future of the CLP will a decision for Defra Ministers and the FSA and FSS will continue to be involved in recommendations on whether to continue the pilot, and, if so, in what form.

5.5 During the summer of 2024, the incoming government decided to pause all work on the CAB and JAM pilots and participants have now been advised that the schemes will now not proceed.

## 6 BTOM and an SPS agreement

6.1 The UK Government has committed to seeking to negotiate an SPS Agreement to help boost trade and deliver benefits to businesses and consumers in the UK and the EU. We are working across Government to maintain public health protections in any SPS agreement, and to understand the implications of an agreement on the BTOM.

## 7 Illegal imports

7.1 The BTOM is intended to control and facilitate the movement of legitimate trade to GB. It is underpinned by the prenotification of shipments and provision of the appropriate certification and other documentation by businesses intending to comply with our border controls.

7.2 Illegal imports, whether intentional smuggling or through lack of understanding of the border control requirements, potentially have multiple entry points via post, commercial and non-commercial carriage via sea and airports and via ship and aircraft waste. Border Force, which collaborates with local PHAs, manages this risk. The potential impact that illegal imports can have, not only on public health but animals as well, means that this can be an area of concern for a range of stakeholders.

7.3 For commercial imports, PHAs have the ability to undertake intelligence-led activity using BTOM information provided by importers and from other data sources to support work to combat smuggling using these routes.

7.4 The highest profile concerns about illegal imports of POAO have centred on pork products originating in countries where African Swine Fever (ASF) is present. These commodities are not allowed to be exported from the restricted zones unless they meet specific treatment requirements, for example heat treatment. These pork products, notably from Romania and Bulgaria, are prohibited from the UK due to the threat that ASF poses to British pig herds.

7.5 There are also current safeguard measures in place for Peste des Petits Ruminants, Sheep and Goat Pox and for Foot and Mouth Disease (FMD), following the recent outbreaks in Germany and Hungary ([footnote 2](#)).

7.6 During the past year, the volume of illegal pork products detected at ports of entry in non-commercial vehicles appears to have significantly increased and there has also been at least one example of smuggling of prohibited pork products concealed within a commercial load during an inspection by a PHA.

7.7 Our intelligence indicates that there is an ongoing demand in the UK for these prohibited raw pork products for which there is no lawful route of entry. This therefore results in illegal imports by traders deliberately operating outside official controls.

7.8 The FSA is therefore concerned by the volume of smuggled POAO products that are being detected at ports in relation to food safety. The conditions of production are not known, there is no traceability, and the conditions of transport are typically unsanitary with long journeys in non-refrigerated vehicles.

7.9 This continues to be an area of focus across government and the FSA's National Food Crime Unit is working with Defra, Border Force, the Welsh Government, DAERA, FSS and PHAs/inland LAs to combat the distribution and sale of illegally imported pork products. **The Board is asked to note our work to tackle this concern.**

## 8 Conclusions

8.1 The implementation of the BTOM means that for the first time the import of EU commodities is being controlled by GB authorities. However, it has proven to be a complex task that has faced a range of issues, and more work remains to be done. We recognise that this work will be impacted by discussions with the EU on an SPS agreement.

8.2 Since January 2024, we have moved from a position where for **EU consignments** only prenotification was required, to one where we have risk-based requirements for Export Health Certification, and identity and physical checks for these consignments.



8.3 Turning to imports from the **Rest of the World**, the risk-based changes to risk categories for a limited number of POAO and the aligning of identity with physical checks has resulted in a similar position to before BTOM implementation. Ports handling these imports were already accustomed to carrying out these checks meaning that adapting their existing processes was more straightforward.

8.4 We will continue to seek the ability to **adjust risk categories administratively**, but the current delays do not pose an immediate concern. We continue to monitor this over time and will keep it under review. We retain the ability to apply safeguard measures in the event of a serious food or feed safety incident.

8.5 **In conclusion, and following consultation with the FSA's Chief Scientific Adviser, our overall qualitative assessment is that the implementation of the BTOM has contributed positively to our ability to manage risks posed to food and feed safety from commercial imports from the EU and has maintained the assurances that already applied to RoW imports.**

8.6 **Illegal imports** are an increasing concern, both for the FSA and many stakeholders and the implementation of the BTOM will support intel-led interventions where commercial routes are used for smuggling. The FSA is investigating whether innovative testing methods can aid our understanding of the public health risk posed and we are also working with Defra, Border Force, the Welsh Government, DAERA and FSS to develop a joined-up approach to address non-commercial smuggling routes in a systematic manner.

## Annex A

### Agreed Board Principles

A series of principles to guide FSA input into the BTOM were agreed with the Board as detailed below and used to inform FSA input during the development of the BTOM:

- the level of food and feed safety is maintained (or improved)
- the policy is driven by science, data and evidence
- the policy is dynamic, changing responsively to ensure food controls target where risk is greatest; and
- the proposals are aligned with global SPS standards.

1. [The Windsor Framework - a new way forward](#)
2. [imports and exports of animals and animal products topical issues](#)