

EXECUTIVE COUNCIL

PUBLIC

Title: Biosecurity risks and the import of used vehicles

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Responsible Director: Director of Natural Resources

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For policy decision

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List of Documents:

1. Recommendations

1.1 Honourable Members are recommended to approve:

- (a) The introduction of mandatory **import permits** for used vehicles, machinery and mobile homes.
- (b) The drafting of **legislation** to provide for the introduction of import permits set out at 1 (a) above.
- (c) The establishment of an optional **pre-export biosecurity inspection** and certification of used vehicles.
- (d) The introduction of a post arrival **vehicle inspection & clearance fee**.
- (e) The introduction of a **decontamination fee** for vehicles arriving in the Falkland Islands which do not meet import health standards.

Executive Council resolved to include the additional recommendations:

- (f) Establish the necessary arrangements in the Islands to meet the appropriate standards for disposal of decontamination waste.

(g) That MoD duty vehicles are to comply with the vehicle import health standards and would be exempt from vehicle inspection and clearance fees.

2. Additional Budgetary Implications

2.1 No additional funds are being requested. The proposed system will generate revenue from fees levied, which will recover some of the costs of the inspection programme; but the extent will depend on the choices made by the importer, and as such are difficult to predict.

3. Executive Summary

3.1 The current situation is that vehicles are not adequately inspected for biosecurity risks prior to importation into the Falkland Islands. cursory inspections are undertaken by MOD staff for military exports, and by Kuehne & Nagel staff for civilian exports, but no one person or agency has overall responsibility (or expertise) for undertaking pre-export biosecurity inspections. This results in vehicles arriving in the Falkland Islands which do not meet Import Health Standards (IHS), which puts the Falklands at risk from alien species, resulting in delays in clearing vehicles at the border. This has become a source of frustration for importers and all stakeholders involved.

3.2 This paper seeks to reduce the biosecurity risks of importing used vehicles through the following pre-border (prior to export) controls.

3.3 Ensure that vehicles are free from biosecurity risk materials *before* they arrive in the Falkland Islands by:

3.3.1 Introducing mandatory Import Permits allowing FIG to stipulate Import Health Standards (IHS).

3.3.2 Introducing optional pre-export inspections in the country of origin, by a FIG approved body, which will produce export certificates to show that vehicles meet IHS and are fit for export.

3.4 Vehicles failing to meet IHS upon arrival in the Falklands are currently held at the port under direction of the Department of Agriculture (DoA), until they are cleaned or decontaminated to meet IHS. There are no dedicated facilities provided at the port, and as such it is the responsibility of the individual importer to provide their own pressure washer and vacuum cleaner, and to undertake the decontamination duties themselves. There is a MOD owned pressure washer and vacuum cleaner at Mare Harbour, but due to liability issues this is usually not available for civilian use. This means that decontamination is not under the control of the DoA and standards are variable, resulting in increased risk to the Falkland's biosecurity and inconvenience and frustration to the importer and port staff.

3.5 There are currently no fees or fines in place to encourage responsible imports or to penalise the minority of importers who consistently expose the Falklands to unacceptable risk.

- 3.6 The second part of this paper seeks to reduce the biosecurity risks of imported used vehicles through the following border (post arrival) controls:
- 3.7 Improve systems on the border to deal with vehicles which arrive in the Falklands in an unsatisfactory condition by:
- 3.7.1 Introducing a mandatory 'Inspection & Clearance' fee for vehicles which do not possess a pre-export inspection certificate (3.3.1). This will incentivise uptake of pre-export inspections.
 - 3.7.2 Introducing a 'Decontamination' fee. This will encourage importers to meet IHS and further incentivise pre-export inspections.
 - 3.7.3 Introducing a vehicle decontamination service. This will ensure that biosecurity risks are dealt with in a robust manner, and meet FIG standards, which will in turn reduce frustration experienced by importers when they have to undertake multiple attempts to decontaminate their vehicle.

4 Background

- 4.1 Used vehicles may contain a host of biosecurity risk organisms, such as soil, insects and spiders, seeds and diseases.
- 4.2 Vehicles are imported primarily from the UK and arrive via the MOD operated FIRS, or the containerised link via South America operated by SAAS. Approximately 500 vehicles are imported each year.
- 4.3 On average, biosecurity risks are identified on 15 % of all vehicles imported into the Falklands. These vehicles fail to meet import health standards.
- 4.4 Serious quarantine pests (pests which could pose significant environmental or economic harm) have already arrived to the Falklands on used imported vehicles. These include fleas, harlequin ladybirds, brown marmorated stink bugs and false widow spiders to name a few.
- 4.5 Existing invasive plant species, such as spear thistles may have arrived via this pathway, and the potential exists for additional invasive species to be brought into the country.
- 4.6 Movement of vehicles may spread pathogens. Vehicles were a key vector for Foot and Mouth Disease spread during the UK outbreak in 2001.
- 4.7 The Import Health Standard (IHS) for used vehicles, machinery and mobile homes, and its accompanying guidance document and declaration form, details maximum contamination thresholds and offers concise information to importers. The IHS is not currently supported by legislation.
- 4.8 With no penalties to deter them, or incentives to encourage them, some importers consistently fail to ensure their vehicles meet IHS, and risk the biosecurity of the Falkland Islands.

4.9 Biosecurity risks are identified on all vehicle types and the recommendations described in section 1 will apply to all used vehicle imports, including military, civilian, private and commercial.

5 Options and Reasons for Recommending Relevant Option

5.1 By implementing all recommendations outlined in section 1, we will have the best chance of safeguarding the Falkland Islands from novel pests, diseases and invasive species which may otherwise arrive with the import of used vehicles.

5.2 This suite of recommendations ensures that issues are dealt with before they reach the Falkland Islands. This is the safest, most robust and most cost effective way of protecting our environment and economy from threats on this pathway.

5.3 It is a proactive approach and based on procedures already used to good effect by other countries which lead the way in biosecurity, including Australia, New Zealand and Canada.

5.4 These recommendations have been widely discussed and have garnered extensive support from key stakeholders.

5.5 Since the pre-export inspection is optional, it does not preclude the export of vehicles from any location where inspection facilities do not currently exist.

5.6 The recommendations will be implemented by the Biosecurity section of the Dept. of Agriculture, including the issue of import permits, and provision of guidance and information.

5.7 A price differential is proposed to incentivise the importer to choose the least expensive option to import a used vehicle, as illustrated in the table below. Please note that prices are guides only.

(5.8) Route 1 - Pre-export inspection				
Pre-export inspection	Import Permit	Inspection & Clearance fee	Decontamination fee	Total Cost
£100	Free	Free	Free	£100
(5.9) Route 2 - No pre-export inspection				
Pre-export inspection	Import Permit	Inspection & Clearance fee	Decontamination fee	Total Cost
£0	£20	£100	£0 (if vehicle meets IHS)	£120
			£100 (if vehicle requires cleaning)	£220

5.8 Importers choosing route 1, and opting for a pre-export inspection are likely to pay a total of £100 for that service in the UK (inspect, clean & certify). They will be eligible

for a free import permit, and will have their local fees for Inspection & Clearance, and Decontamination waived.

- 5.9 Importers choosing not to have a pre-export inspection (route 2) will be required to pay for their Import Permit, plus a mandatory Inspection & Clearance fee on arrival totalling £120. If their vehicle does not meet IHS they will also be subject to a Decontamination fee, bringing the total cost to £220.
- 5.10 Some importers may be unhappy with this additional cost. The reason for imposing these extra costs, and their reasonableness, will need to be carefully explained by the Department of Agriculture.
- 5.11 The concern over extra costs will be offset to some degree by an improved and more efficient service for the importer.
- 5.12 A number of UK companies have been identified who are willing to offer pre-export cleaning services close to Marchwood and Felixstowe (the two key ports exporting vehicles to the Falklands). These companies have been approached and have offered to become FIG approved inspectors.

6 Resource Implications

6.1 Financial Implications

- 6.1.1 FIG will seek bids from the private sector to operate a post-arrival cleaning and decontamination service. This will be mobile and cover vehicles arriving at both Mare Harbour and Stanley. If there is no interest from the private sector, basic equipment such as a pressure washer and vacuum cleaner will be purchased using internal DOA budget, and casual labour will be employed to operate the service as needed (again using existing DOA casual labour vote).
- 6.1.2 Revenue will be generated from the collection of fees and the issue of import permits, however it is difficult to predict how much revenue will be generated as it depends on the choices made by the importer.
- 6.1.3 No revenue will be generated for FIG from vehicles which have been given pre-export inspections. However there will be a significant saving in the BSO's labour for such vehicles.

6.2 Human Resource Implications

- 6.2.1 No extra staff will be required to implement this new policy. Biosecurity staff will be responsible for the issue of import permits, administration and arrival inspections & clearance.
- 6.2.2 The implementation of this system will shift current inspection workload away from the border and increase effort pre-border, which is a favourable situation in terms of improved biosecurity. There will be no net increase in workload. If anything, the new

system should reduce the amount of time the BSO spends checking incoming used vehicles and having to deal with those that have arrived in an unsatisfactory condition.

6.3 Other Resource Implications

There are no other resource implications.

7. Legal Implications

- 7.1. The Attorney General advises that to introduce import permits for vehicles there will be a requirement to draft both primary and secondary enabling legislation.

8. Environmental & Sustainability Implications

- 8.1 Improved biosecurity on imports of vehicles will be a tangible step towards the better protection of the Falklands environment, by reducing the risk of introducing non-native species, in line with FIG's Biodiversity Strategy and the Biosecurity & Invasives Strategy.
- 8.2 Failing to adopt these recommendations may result in serious environmental and economic harm.

9. Significant Risks

- 9.1 Invasive species pose a serious risk to the Falkland Islands, and a key pathway for their entry is via the import of used vehicles.
- 9.2 By not implementing these recommendations, used vehicles will continue to be a high risk pathway for the introduction of pests, diseases and invasive species into the Falklands. Stakeholders will continue to suffer the frustrations caused by imports failing to meet IHS, and we will remain vulnerable to environmental and economic harm.
- 9.3 Several recent scares have highlighted used vehicles as a high risk pathway for the introduction of cat fleas. Cat fleas would significantly increase the veterinary case load and require additional resources.
- 9.4 A serious incursion of Brown Marmorated Stink Bugs (*Halyomorpha halys*) in 2017 illustrated the very real threat to the Falkland Islands environment and economy, from organisms accidentally imported on this pathway.
- 9.5 Existing invasive plants may have arrived on imported used vehicles, and the risk of further introductions is great. Soil removed from imported vehicles has been shown to contain numerous viable seeds, many from species with potential to become invasive.
- 9.6 Pathogens such as Foot and Mouth Disease, are easily transported on vehicles, and threaten the future of our livestock and agricultural industries. Safeguards to minimise their introduction, albeit a low risk, may prevent future catastrophe.

10. Consultation

- 10.1. A paper detailing these proposals was considered by the Agricultural Advisory Committee in December 2016. The committee endorsed the proposals.
- 10.2. A consultation document was circulated among key stakeholders in February 2017.
- 10.3. An earlier version of this paper (72/17) was submitted to ExCo in May 2017, and specific queries answered in subsequent ExCo meetings of the previous assembly.
- 10.4. Local stakeholders and counterparts in the UK were consulted in the development of these recommendations. Consultations took the form of extensive face to face meetings, email conversations, distribution of documents and a visit to the UK.
- 10.5. Stakeholders consulted in this process include, but are not limited to: SAAS, FIS (Falkland Islands Shipping), SSL (Stanley Services Ltd), DHL Marchwood (now Kuehne & Nagel), SMC Marchwood (MOD representative Lieutenant Colonel MJC Garrety), Solent Gateway (Marchwood Port operators), Seafast Logistics (shipping agent for SAAS), JEVIC (UK based pre-export inspection company), Cleaner Cars (UK based car cleaning company) 460 Port Troop and the Queen's Harbour Master.

11. Communication

- 11.1. New import requirements will be communicated to stakeholders to ensure that they are aware of the changes. This will take place in advance of the new measures being introduced to allow importers to make the necessary arrangements to comply.
- 11.2. Information will be disseminated to importers directly from the DoA or when booking vehicles for shipping on either the SAAS or MOD routes. All relevant information will be available on the DoA website.
- 11.3. An awareness raising campaign to include articles in the Penguin News, Wool Press and on social media will ensure that the improvements are widely publicised.

12 Implementation timetable

- 12.1 The implementation period for this new policy could be as long as 12 months in order to allow for the necessary legislative drafting and to give a reasonable period of notice to those who be affected by its introduction.