

**British Berry Growers Submission to
the DBT/DEFRA Trade Strategy Consultation**

JANUARY 2025

The Opportunity for Export

1. British Berry Growers (BBG) is a crop association representing 95% of all English and Welsh commercial berry growers, as well as those in Scotland. In this context, berries are strawberries, raspberries, blackberries and blueberries. British growers currently meet nearly 100% of the UK's needs for berries during the main British production season which runs from late April to late October.
2. British Berry Growers' stated ambition is for our exports to be 50% bigger than British sales volumes by 2035. This is one of the industry's key policy objectives ⁱ (EY Report Oct 2024)
3. The UK retail market is extremely competitive and relatively low price. The market is also dominated by a small number of major retailers who account for over 97% of fresh berry sales in the UK ⁱⁱ (Kantar retail sales stats). Export markets represent a major opportunity for growers to increase production, make additional sales and access potentially higher value markets.
4. The domestic market for UK grown berries is currently estimated to be worth £1.3 billion at retail (65% of Kantar year-round retail sales value). The UK berry industry contributes £624 million GVA to the UK economy and provides over 16,000 FTE jobs in rural locations ⁱⁱⁱ (EY report Oct 2024). Therefore, it is clear there are huge potential benefits to the UK economy from berry export growth.
5. The UK berry industry is probably the most technologically advanced in the world and UK quality standards (driven by UK retailers) amongst the highest. This has created a high demand for quality British berries across the world and our growers export to European countries including France, Germany, Netherlands, Norway, Sweden and Denmark, as well as to Middle East countries such as Kuwait and the UAE, and as far field as Hong Kong, Singapore and Japan.
6. Opportunities for export are expected to expand rapidly in the future. Climate change will mean that the UK, with its temperate, maritime climate and good overall water availability, is in a better position to produce fresh berries in the future than the countries of mainland Northern Europe and Southern Europe, as global warming takes effect.
7. The ability of the UK fresh berry production industry to expand rapidly when sales opportunities present themselves can be seen from the growth the UK production industry from 60,000 tonnes pa in 2012 to 100,000 tonnes pa in 2021 driven by increasing UK domestic demand ^{iv} (EY Report Oct 2024)
8. Our UK berry industry is also a world leader in many aspects of technology such as substrate production and automation. These present a future opportunity to export technology and intellectual property as well as fresh berries.

The Current Issues with Exporting and The Asks of the Industry

9. To be successful in exporting fresh berries, exporters need an agile and responsive approval process and decisions have to be made quickly. Fresh berries by their very nature have a short shelf life and any delay can ruin a consignment. The short shelf life and fluctuating demand (shelf life is typically 5 days from harvest and 3 days on shelf) means that retailers anywhere in the world tend to place final order volume confirmations at 24 to 48 hours' notice, and suppliers have to be able to react to this requirement to secure business.
10. For all exports from the UK to EU since BREXIT, and to all other countries, there is a requirement for a phytosanitary certificate. Furthermore, in the case of the EU, there is an additional requirement for conformity to EU/UK produce grading standards. This means another certificate needs to be issued for and accompany every consignment on arrival at both borders. Both these documents can only be issued by a Defra plant health inspector following an in-person visit to a grower, or in the case of EU export at a registered border station under the PHEATS system. For non- EU destinations phytosanitary certificates issued by DEFRA after physical inspection are required for every consignment. In England, Defra plant health requires 5 days' notice to arrange these inspections. The great majority of berry growers are not registered for PHEATS.

Since BREXIT and the introduction of the same regime for EU exports, our annual berry export volume to the EU (our largest potential, and most accessible market) has fallen to below one fifth of pre-BREXIT levels and is only slowly recovering under the current export regime. This has been driven entirely by the difficulty of exporting under the current inspection constraints. The table below shows the export of strawberries over the past ten years:

Year	EU Kg	Non EU Kg	Total Kg
2013	576,217	4,096	580,313
2014	753,168	6,696	759,864
2015	1,399,826	13,664	1,413,490
2016	1,185,829	8,333	1,194,162
2017	3,692,095	20,426	3,712,521
2018	1,202,526	6,316	1,208,842
2019	1,577,339	7,576	1,564,915
2020	3,517,344	9,030	3,526,374
2021	203,114	61,819	264,933
2022	656,797	81,599	739,356
2023	944,372	441,243	1,385,615

Source: <https://www.uktradeinfo.com/trade-data/ots-custom-table/>

Our Asks – Reduction in Border Friction

11. In terms of operational issues under the current regulatory regime:

UK berry growers need to be able to arrange inspection by Defra Plant Health inspectors on a time scale that ties in with the product order and lifecycle. This would be to request inspection by 5pm Day 1, for inspection by 11am latest day 2. This timing is already being delivered in Scotland where a request for inspection before 10am has to be made by 5pm the previous day. This is, we believe, is because there are a greater number of Plant Health Inspectors employed in Scotland pro rata to industry size. This ask is critical to any serious attempt by the UK industry to increase access to export markets and is purely operational.

By contrast, we understand that growers in the Netherlands, with whom British growers compete against in the global market, and who export globally approximately 20 times the amount the UK exports, have a commerce supporting approach to exports. Inspections are still required for non-EU exports, but official inspections of the fruit to be exported are booked on a schedule of notification that is - before 10am same day inspection, notification 10am to 4pm following morning inspection. Inspectors also work Monday to Saturday, whilst in the UK they are only available Monday to Friday, and at far longer (and impractical) five day notice.

For UK to EU exports (only), a very limited number of organisations have joined the Plant Health Exports Audited Trader Scheme (PHEATS). This scheme is designed to facilitate export trade while ensuring the requirements of the importing country can be met. Under this scheme the exporters can themselves raise the phytosanitary certificates and required travel declaration documents for fruit exports to the EU and Northern Ireland. PHEATS is welcomed, however, there is a cost to implementing the scheme in both hours and fees. Two days training is required for each staff member with a mandatory test on completion and this has to be repeated annually. A fortnightly inspection visit by Defra is required for each site and for every consignment there is a physical fruit check to be done, mandatory paperwork to be completed and checks to be recorded. There is also an online application and registration process for the consignment. This can all take a day and a half to complete. PHEATS is a chargeable service and reduction in the cost and complexity of this scheme would allow more growers to take part in the scheme and for UK exporters to better compete with their international counterparts.

12. In terms of regulatory change for the future:

As noted previously, a reduction in the cost and complexity of being registered for and operating under PHEATS would also be a huge benefit as it would allow many more growers to operate under this system and would also alleviate a great deal of the burden on DEFRA Plant Health inspectors.

To end, there are real opportunities for exporting berries to Europe and around the world. However, there is also real competition and, if the barriers to exporting are not addressed, the efforts required by growers, their costs and the inherent risks will outweigh the attraction of exporting.

British Berry Growers
16 January 2025

-
- i EY Report The British Berry Industry in Focus Oct 2024 page 8
 - ii Kantar retail sales to 26/12/24
 - iii EY Report The British Berry Industry in Focus Oct 2024 page 11
 - iv EY Report The British Berry Industry in Focus Oct 2024 page 27