Department
for Environment
Food & Rural Affairs

Consultation Report

Proposed revision of existing fees for statutory services delivered by the Animal and Plant Health Agency (APHA)

10 April 2018

Llywodraeth Cymru
Welsh Government

The Scottish Government

Animal &
Plant Health
Agency

This publication is available at www.gov.uk/government/publications

Any enquiries regarding this publication should be sent to us at chargingenquiries@apha.gsi.gov.uk

www.gov.uk/defra

Contents

Summary

Between 26 October 2015 and 14 December 2015 the Animal and Plant Health Agency (APHA) conducted an open public consultation on proposals to revise fees for six statutory services the Agency provides.

This consultation was held on behalf of UK government, Scottish government and Welsh government with the proposals being consistently applied across Great Britain.

Over 350 organisations in England, Scotland and Wales were directly contacted by email or letter to alert them to the consultation. A total of 20 responses were received; 13 consultation questionnaire responses and 7 e-mail or letter correspondences.

This is a report on the outcomes of the consultation, the publication of which has been delayed.

Where the consultation document referred to options for implementation of the revised fees from 2015/16, this should now be regarded as 2018/19. Some comments submitted by respondents that are quoted below include references to the original planned timeline and are included here verbatim.

Background

The purpose of this consultation was to seek the views of stakeholders likely to be affected by proposed revisions to fees for six statutory services delivered by APHA. The consultation outlined proposals to transfer the full costs of delivering these services from the general taxpayer to the users of them. The consultation built on informal and formal discussions with some representative industry associations during the development of the impact assessments for each of the services.

The six statutory services covered by the consultation are:

- Bovine embryos
- Bovine semen
- Porcine semen
- Poultry Health Scheme (PHS)
- *Salmonella* National Control Programmes (NCP)
- Border Inspection Posts (BIPs)

In line with government policy, end users who benefit directly from a service are already charged a fee for these services delivered by APHA. However in a number of these areas, fees have not been updated for some time. The consultation identified three options for consideration:

- **Option 0: No intervention. Fees would be maintained at current levels**
- **Option 1: Revise current fees to Full Cost Recovery (FCR) rates as per previous (Summer 2012) consultation**
- **Option 2: Revise current fees to new FCR rates in 2015/16** (Note: Shown as 2015/16 in the Consultation Document but now planned for 2018/19).

Option 2 was the preferred option of APHA, Defra, the Scottish government and the Welsh government for all services. Option 2 would achieve the objective of FCR based on the Agency's revised methodology, limited changes to the current fees and reduced rates charged for officer time.

Annexes 1 to 6 of the Consultation Document set out the proposed fees for activities under each of the six areas based on the three options for consideration.

The consultation included a questionnaire which set out specific questions to help us make informed assessments of the risks associated with the proposed options for each of the

services. Responses to each of the individual questionnaires together with the government response are shown at Sections 1-5 of this document.

Over 350 organisations and businesses were invited to respond to the consultation, which was also advertised and open to the general public on www.gov.uk.

Body responsible for consultation

The consultation was undertaken by APHA on behalf of Defra, the Scottish government and the Welsh government.

Duration

The consultation was launched on 26 October 2015 and finished on the 14 December 2015. In response to stakeholder feedback, the consultation was extended by one week.

Summary of responses

20 responses to the consultation were received. Responses were received from a range of businesses, trade associations and industry groups, farming unions, charities and individuals. 13 questionnaires were received which addressed the specific questions posed. The remaining 7 responses were via e-mail or formal letter.

We are grateful to everyone who took the time and effort to respond. This summary seeks to reflect the views received. Every response has been read and considered. The majority of respondents expressed opposition to any changes in existing fees.

A list of respondents can be found at **Annex A**. For reasons of confidentiality, only organisation and business names are shown in this list.

Section 1: Bovine embryos, Bovine semen and Porcine semen questionnaires

Number of responses

Three questionnaires were received for Bovine embryos and three questionnaires were received for Bovine semen in relation to the proposed revision of fees - from four respondents. Two respondents completed questionnaires for both Bovine embryos and Bovine semen. One generic letter response was received that focused on all six statutory services covered in the consultation and one email response was received in relation to Porcine semen. No questionnaires were received in relation to Porcine semen.

Breakdown of questionnaire responses

About you

How many people do you employ?

Two respondents each employ between 0 - 10 people so are regarded as a micro business, whereas one respondent employs more than 250 people and is regarded as a large business. One respondent did not answer this question.

Which parts of Great Britain do you operate in?

The respondents operate throughout Great Britain. One respondent operates in England only and two respondents operate in England, Scotland and Wales. One respondent did not answer this question.

Our proposals

What is your preference for achieving full cost recovery between Option 1 *(revised fees as per the 2012 public consultation)* and Option 2 *(proposed revised fees using the new FCR model including charging for travel time)* and why?

For **Bovine embryos**, two respondents expressed a preference for Option 2, to revise fees using the new FCR model including charging for travel time. The respondents commented:

> "Extra fees will be passed on by A.I. Companies"

> "We are opposed to all but the specific fee costs being charged. We do not accept that salary costs, non-pay running costs or indirect costs should be borne by the individual businesses. These costs are not within the control of the business

operators and therefore should not be included. Option 2 is our preferred method as this represents a cheaper option (as per the assumptions and example provided)"

One respondent expressed a preference for Option 1, to revise fees in line with the 2012 consultation but did not provide a reason for this choice.

For **Bovine semen**, one respondent expressed a preference for Option 2, to revise fees using the new FCR model including charging for travel time. The respondent commented:

"extra fees will be passed on by A.I. Companies"

One respondent expressed a preference for Option 1, to revise fees in line with the 2012 consultation. The respondent commented:

"In the consultation document there is estimation that Option 1 will impact the industry by £75,000 and Option 2 will impact the industry by £80,000. It is not clear from the figures in the annex how this has been worked out as the figures listed for Option 1 would suggest this to be more expensive. My preference would be for the option which has the least impact on the business"

The second respondent stated that they are opposed to all but the specific fee costs being charged.

"We do not accept that salary costs, non-pay running costs or indirect costs should be borne by the individual businesses. These costs are not within the control of the business operators and therefore should not be included. The respondent continued that it isn't clear from the consultation document whether Option 1 or Option 2 is the cheapest option compared to the baseline current cost structure. In the text, Option 2 is anticipated to represent an increase against the current regime of £80,000 a year compared to Option 1's expected £75,000 per year. However, the analysis in Annex 2 seems to show that Option 2 is relatively similar to the baseline until the undisclosed variable of laboratory fees is added in. How does the analysis go from being more or less comparable to +£80,000?
Without this answer, we do not feel able to state a preference other than to stay with Option 0, the current charging regime. We are unwilling to support either of the Options (options 1 or 2) without clarification from APHA of the cost analysis. The issue appears to be around the financial value of the laboratory fees. Whilst we acknowledge that laboratory fees are not part of the APHA's statutory fee schedule, their impact on the overall cost analysis must be understood more in order to inform our conclusion"

What do you see as the key risks surrounding the implementation of Options 1 and 2, their likelihood and impact?

For **Bovine embryos**, one respondent did not answer this question. Two respondents identified the following risks:

> “Affects domestic markets. Members [of the organisation] will use inferior natural service”
>
> “Affects burgeoning export trade”
>
> “Degrades genetics of the breed”
>
> “Increased costs could encourage non-compliance”
>
> “Increased costs could threaten business viability with a negative impact which far outweighs the disease risk to the overall industry”

For **Bovine semen**, all three respondents replied and identified the following risks:

> “An additional £80,000 (under Option 2) or £75,000 (under Option 1) is a lot of money and in the current financial climate could prove too great a challenge. An increase in statutory costs of this magnitude could absolutely threaten the financial viability of a business”
>
> “It is highly likely that the additional cost of statutory charges will be, certainly in part, passed back to the customers. Many of these farms use bovine semen to avoid having to buy in stock bulls, to improve their herd's genetics and breeding traits and ultimately to make animal welfare and production improvements. Costs of the magnitude suggested will cause many to consider their business structures and models which could have a cumulative detrimental impact on the cattle industry”
>
> “We will reduce the volume of non-statutory testing which we do in a bid to cut costs”
>
> “We will look to other laboratories for non-statutory testing in a bid to cut costs”
>
> “Increased costs will obviously increase our cost of production. Being a global company this may mean that production levels are reduced in the UK to be produced in another country that can produce semen cheaper”
>
> “Affects domestic market. Members will use inferior natural service”
>
> “Affects burgeoning export trade”
>
> “Degrades genetics of the breed”

Impacts on you

What would you expect the impact of revised fees to be on your profit margins and would you expect to absorb this cost/saving or transfer it to your customers?

For **Bovine embryos**, one respondent expects that the revised fees will cause a significant impact on their profit margins and will therefore absorb and transfer the costs.

One respondent hopes to maintain profit margins and intends to pass on the cost to their customers. One respondent did not answer this question.

For **Bovine semen**, two respondents commented that the revised fees will have a significant impact, with one respondent stating that it has an obvious reduction on profit margins. One respondent commented that they will be unlikely to pass the costs on to the customer and continued by stating:

> "It is more likely production levels will be reduced in the UK and allocated to another country whose cost of production is cheaper"

One respondent commented that they will absorb and transfer the costs. One respondent did not answer this question.

How do you think this fee revision will affect the demand for your goods and services? Increase demand, Decrease demand or No difference?

For **Bovine embryos**, two respondents anticipate that the revised fees will decrease the demand for goods/services. One respondent did not answer this question.

For **Bovine semen**, one respondent commented that they did not anticipate a difference, whereas one respondent anticipates the revision of fees will decrease the demand for goods and services. One respondent did not answer this question.

As a result of the revision of fees would you expect to reduce or increase the volume you trade in?

For **Bovine embryos**, one respondent did not answer this question and two respondents expect a reduction in the volume of trade. One respondent commented:

> "farmers under financial difficulty with milk prices will be unable to afford the services if fees climb"

For **Bovine semen**, one respondent did not answer this question and two respondents expect a reduction on the volume of trade. One respondent commented:

> "it is clear within a global organisation that if our cost of production goes up then production will be allocated to regions where it can be produced more cheaply"

Other impacts

Do you consider that the revision of fees will encourage compliance with the regulations? Encourage compliance, Discourage compliance or No difference?

For **Bovine embryos**, one respondent anticipates no difference, whereas one respondent believes that the revision of fees will discourage compliance with regulations. One respondent did not answer this question.

For **Bovine semen**, two respondents commented that there will be no difference in compliance with the regulations. One respondent did not answer this question and another clarified their response by stating:

> "as a major international company we always abide by regulations"

Are there any other impacts, not currently identified, that we need to consider?

For **Bovine embryos**, two respondents did not answer this question and one respondent commented:

> "there is the potential impact on genetic merit of breed"

For **Bovine semen**, two respondents did not answer this question and one respondent commented:

> "there is the potential impact on genetic merit of breed"

Are there any cumulative impacts arising from these revised fees against other current statutory charges?

For **Bovine embryos**, no other cumulative impacts were stated by the respondents. For **Bovine semen**, two respondents did not answer this question.

What are the impacts likely to be on micro and small businesses?
(11 - 49 employees = small; 10 or less = micro) Do you have any evidence of this and numbers likely to be impacted?

For **Bovine embryos**, no impacts on micro or small businesses were stated by the respondents.

For **Bovine semen**, two respondents did not answer this question. One respondent identified the following impacts:

> "Whilst we are a large global company our main UK production facility comprises of only 18 people. The potential financial impact you describe if shared across the 3 UK semen companies covers more than one full time salary for our site. This could result in job loss or reduced working hours / overtime"

Additional responses/comments

For **Bovine embryos**, two respondents provided the following comments:

> "The society participates in Global breeding. Increased costs at A.I. collection centres will impact on our ability to genetically improve the Guernsey breed at home and abroad, in turn affecting the diversity of cattle breeds worldwide"

> “The trade in bovine embryos provides an important means of improving the genetic makeup of the national cattle herd and can benefit on-farm biosecurity, cattle health and welfare and farm business viability and profitability. Any additional costs incurred through charging must be kept to an absolute minimum and be proportionate to any risks”

One respondent did not provide any further comments.

For **Bovine semen**, one respondent did not answer this question. Two respondents provided the following comments:

> “The society participates in Global breeding. Increased costs at A.I. collection centres will impact on our ability to genetically improve the breed at home and abroad, in turn affecting the diversity of cattle breeds worldwide”

> “unwilling to support either of the Options (options 1 or 2) without clarification from APHA of the cost analysis. The issue appears to be around the financial value of the laboratory fees. Whilst we acknowledge that laboratory fees are not part of the APHA's statutory fee schedule, their impact on the overall cost analysis must be understood more in order to inform our conclusion”

One letter response advocated allowing testing to be carried out by commercial laboratories, thus putting them on a level playing field with other European countries. The current position is that officially approved laboratories have to be used, which can be government laboratories or commercial laboratories, however currently no commercial laboratories in the U.K. hold that approval. Where applicable, APHA charges laboratory fees on a commercial basis to ensure an open market for any potential future commercial suppliers.

Government response

Option 0

One respondent expressed a strong preference for this option for **Bovine semen**. However, this is not a considered option for delivering Government’s objective of transferring the cost burden to users but provides a baseline against which the other options can be assessed.

Option 1

Two respondents (one each from **Bovine embryos** and **Bovine semen**) expressed a preference for this option. However, this is not considered an acceptable option for delivering the Government’s objective of fully transferring the cost burden to users but provides a comparison against which the other options can be assessed.

Option 2

Three responses (two from **Bovine embryos** and one from **Bovine semen**) expressed a preference for this option, to revise current fees to new FCR rates in 2015/16 (Note: now revised to 2018/2019). Under this option, fees would be updated on the revised FCR methodology, including charging for travel time.

Option 2 would minimise the impacts on stakeholders (particularly small and micro businesses) whilst ensuring progress towards FCR.

Some of the respondents queried whether testing would be allowed to be carried out by commercial laboratories, thus putting them on a level playing field with other European Countries. The current position is that officially approved laboratories have to be used, which can be government laboratories or commercial laboratories, however currently no commercial laboratories in the U.K. hold that approval. Where applicable, APHA charges laboratory fees on a commercial basis to ensure an open market for any potential future commercial suppliers.

Some respondents commented that the fees for Options 1 and 2, as set out in Annex 2 of the Consultation Document, suggest a bigger difference between the two than is summarised in paragraph 3.2.8 (Expected level of business impact) of the document. This summary is based on simple calculations using historical data and proposed fees to provide an estimate of the overall impact for each option for comparison.

A direct comparison is not possible as there are differences in the fee structures for Options 1 and 2. These are explained in Annex 2 of the Consultation Document. The first major difference relates to travel time. Under Option 2 travel time would be capped at a total 90 minutes (for the return journey) in order to minimise the impact of this element of the fee. The figure shown at para 3.2.8 of the Consultation Document for Option 1 also includes travel time at 90 minutes but this under-estimates the overall impact as, in reality, some visits require a journey in excess of 90 minutes. In these instances all of the journey time costs (not just the first 90 minutes) would be shown as recovered under Option 1.

The way laboratory fees are applied also differs between the two options. These are included in Option 1 but are separate under Option 2. The latter is a better representation, as APHA provides these laboratory services on a commercial basis and they should not be shown as an inclusive part of APHA’s fees within the statutory schedule.

Defra is reviewing the position in relation to the current requirement to use only officially accredited laboratories.

Section 2: Poultry Health Scheme (PHS) questionnaire

Number of responses

Three questionnaires were received in relation to the PHS proposed revision of fees and one generic response that focused on all six statutory services covered in the consultation.

Breakdown of questionnaire responses

About you

How many people do you employ?

All respondents employ more than 250 people, so are regarded as large businesses.

Which parts of Great Britain do you operate in?

The respondents operate throughout Great Britain. One respondent operates in England only and one operates in England and Scotland. The third operates in England, Scotland and Wales

Our proposals

What is your preference for achieving full cost recovery between Option 1 *(revised fees as per the 2012 public consultation)* and Option 2 *(proposed revised fees using the new FCR model including charging for travel time)* and why?

All four respondents agreed with the proposal to revise fees using the new FCR model including charging for travel (Option 2). The respondents also commented:

> "It is seems reasonable to be charging for what it costs to run PHS. Option 1 seems a steep increase and does not appear to reflect the costs of only the PHS"

> "As there is no option to remain the same, Option 2 is the best available option"

What do you see as the key risks surrounding the implementation of Options 1 and 2, their likelihood and impact?

One respondent expressed the view:

> "a key risk of a steep increase in fees under Option 1, may affect businesses"

Impacts on you

What would you expect the impact of revised fees to have on your profit margins and would you expect to absorb this cost/saving or transfer it to your customers?

One respondent stated:

> "any impacts on profit margins will be absorbed by the producer/business"

Another respondent indicated that:

> "although impacts of Option 2 on profit margins should be negligible, they are ultimately transferred to the customer"

How do you think this fee revision will affect the demand for your goods and services? Increase demand, Decrease demand or No difference?

The respondents anticipate there will be no difference in the demand for goods/services.

As a result of the revision of fees would you expect to reduce or increase the volume you trade in?

The respondents anticipate there will be no difference in trade volumes, with one respondent suggesting:

> "due to stock being high value, the increases are a small component of that cost"

Other impacts

Do you consider that the revision of fees will encourage compliance with the regulations? Encourage compliance, Discourage compliance or No difference?

The respondent considers that there will be no difference in compliance with the regulations.

Are there any other impacts, not currently identified, that we need to consider?

One respondent requested for APHA to:

> "consider combining animal health visits [to our members] that have PHS, NCP and Compartment visits and, going forwards, ABP inspections"

The respondent explained that:

> "combining visits will reduce the costs on the poultry industry whilst eliminating duplication of efforts by APHA officials"

Are there any cumulative impacts arising from these revised fees against other current statutory charges?

No other impacts were reported by the respondents.

What are the impacts likely to be on micro and small businesses? (11- 49 employees = small; 10 or less = micro) Do you have any evidence of this and numbers likely to be impacted?

One respondent expressed a view that profit margins of small/micro businesses might be impacted.

Additional responses/comments

A respondent enquired about arrangements for paying upfront for all their sites suggesting this saves on administration costs for them and for APHA. The respondent expressed that they hoped administration cost savings could be achieved by dealing with all their premises within one overall application. Furthermore, the respondent explained that the PHS audits are combined with compartment audits and they are looking for a combined reduction in cost as travel time is already factored in to compartment audits and much of the audit process overlaps.

Government Response

Option 0

No respondent expressed a preference for this option. In any event, this is not a realistic option because it does not achieve the desired outcome of full recovery of costs, but provides a baseline against other options that can be assessed.

Option 1

No respondent expressed a preference for this option. However, this is not considered an acceptable option for delivering the Government's objective of fully transferring the cost burden to users but provides a comparison against which the other options can be assessed.

Option 2

All four respondents expressed a preference for this option, to revise current fees to new FCR rates in 2015/16 (Note: Now revised to 2018/19). Under this option, fees would be updated to the revised FCR methodology, including charging for travel time. For PHS, the majority of fees would be reduced, with the exception of certain laboratory fees.

Option 2 would minimise the impacts on stakeholders (particularly small and micro businesses) whilst ensuring progress towards FCR.

APHA notes the comment provided around combining visits. As part of Defra's Transformation programme and collaborative working with Scottish and Welsh

Government officials, APHA is looking for efficiencies, including combining visits. If realised, these efficiencies would be reflected in the fee structures in any future review of fees.

Section 3: *Salmonella* National Control Programmes questionnaire

Number of responses

Five consultation questionnaire responses were received in relation to the *Salmonella* NCPs proposed revision of fees and one generic response that focused on all six statutory services covered in the consultation.

Breakdown of questionnaire responses

About you

How many people do you employ?

Four of the respondents employ more than 250 people, so are regarded as large businesses. One respondent employs 0 – 10 people, so is regarded as a micro business.

Which parts of Great Britain do you operate in?

The respondents operate throughout Great Britain. Two respondents operate in England only; one respondent operates in England and Scotland. Two respondents operate in England, Scotland and Wales

Our proposals

What is your preference for achieving full cost recovery between Option 1 *(revised fees as per the 2012 public consultation)* and Option 2 *(proposed revised fees using the new FCR model including charging for travel time)* and why?

Two respondents indicated a preference for Option 2, to revise fees using the new FCR model including for travel time.

Two respondents indicated a preference for Option 2, however both respondents explained their reason for this choice, as there was “not a ‘Do not agree’ option, so Option 2 is the next best option available”. Both of these respondents did, however, welcome the reduced laboratory fees to test samples under Option 2. These two respondents provided the following explanations to their choices:

One respondent is concerned:

> “at the significant cost increase of taking an official sample for a chicken laying flock. Currently the charges are £60 (fixed fee) and no charge for the authorised technician's travel. Even taking the typical total fee in 2014/15 of £132, this is a

28.8% increase to £170. The worked example is incorrect as the number of samples required for a chicken layer flock is 3 (not 5 which is for a breeder flock)"

Another respondent was similarly concerned:

"at the significant cost increase of taking an official sample for a chicken laying flock. The existing charges are solely £60, with no charge for the technician's travel. If we take the "typical" total fees in 2014/2015 under option 2 the UK poultry sector will experience the following increases;

- Chicken laying flock - 28.8% increase.

- Chicken or turkey breeding flock - 13.1%.

- Chicken broiler flock - 30.4%.

- Turkey fattening flock - 32%.

It is worth noting that the layer flock example is incorrect as it should be based upon 3 samples per flock and not 5. 5 samples are required only for breeding stock in layers"

One respondent indicated a preference for Option 1. The respondent commented that it was "difficult to find or follow what the fees were going to be", so opted for Option 1.

What do you see as the key risks surrounding the implementation of Options 1 and 2, their likelihood and impact?

Two respondents did not answer this question. Three respondents identified the following:

"Recognising that the egg industry operates in the unsupported sector of agriculture, the increase in fees is far above inflation"

"Two respondents commented that farms should not be penalised for its location relative to the authorised technician's travel time. The respondent continued to express that they could not support a proposal to include travel time just because the lab doing the testing has been authorised and licenced by APHA doesn't automatically mean the charges should be a rip off"

Impacts on you

What would you expect the impact of revised fees to be on your profit margins and would you expect to absorb this cost/saving or transfer it to your customers?

Three respondents confirmed that they would absorb the cost/savings, explaining:

"the egg industry is highly competitive and little possibility for producers to pass on costs, with the most likely outcome that the costs will be taken straight off the

> producers margin. Profit margins will therefore be reduced and poultry producers will be placed at an even higher disadvantage at those in the pig sector"

Two respondents did not answer this question.

How do you think this fee revision will affect the demand for your goods and services? Increase demand, Decrease demand or No difference?

All five respondents considered that there would be no difference in the demand for their goods/services.

As a result of the revision of fees would you expect to reduce or increase the volume you trade in?

All five respondents considered that there would be no difference in their volumes of trade, although two respondents commented that:

> "if businesses have to absorb the costs, it may affect their competitive position"

One respondent commented:

> "unless they pass the extra cost onto their customers they will not notice the difference – why would increase costs for me help increase my volume of trade?"

Other impacts

Do you consider that the revision of fees will encourage compliance with the regulations? Encourage compliance, Discourage compliance or No difference?

All five respondents considered there will be no difference in compliance with the regulations, as they already comply. Two respondents commented:

> "UK producers currently have one of the best compliance results in the EU and respective salmonella results are also good. We do not see a correlation between increased fees and poorer compliance in this particular situation. There is no incentive to do so"

One respondent continued to explain:

> "producers accept their responsibility to produce safe food"

Another respondent considered that:

> "extra costs are more likely to make people less compliant because of the extra costs involved"

Are there any other impacts, not currently identified, that we need to consider?

Two respondents provided comments:

> "Many poultry producers will be greatly disappointed to see an increase in fees. They do not like seeing any competitive disadvantage with other sectors and in this case widened even further"

One respondent flagged the issue of samples of breeding chickens being undertaken by APHA staff and Official Veterinarians undertaking samples of turkeys, on behalf of APHA. The respondent considers that:

> "the current situation results in duplication of effort and administrative inefficiency, with resultant increases in the cost to industry"

The respondent requests for APHA to consider that OVs can undertake samples for breeding chickens on behalf of APHA. Furthermore, the respondent would welcome the opportunity, with respect to the chicken laying industry, to facilitate the administration of the system by maintaining records of producer choice of sampler, dates of sampling, and flocks housed.

Two respondents did not answer this question.

Are there any cumulative impacts arising from these revised fees against other current statutory charges?

Four respondents did not answer this question. One respondent identified impacts stating:

> "cumulative impacts could be on the market place. The pig sector has a significant advantage over the poultry sector, given they do not have the same costly control measures in place. This potentially could make pork products more price competitive at retail level which may impact on sales of UK poultry products"

What are the impacts likely to be on micro and small businesses?
(11 - 49 employees = small; 10 or less = micro) Do you have any evidence of this and numbers likely to be impacted?

Three respondents did not answer this question. Two respondents identified the following impacts on small businesses:

> "The costs to small businesses will be more significant, particularly as they have less bargaining power to get consequential higher prices from the supply chain. It will further erode their typically smaller margins. There are thousands of producers across the UK poultry meat and egg sector which exceed the threshold whereby official samples are require. In the egg sector there is in the region of 1,500 egg producers which exceed 1,000 bird flocks, which mean they will be required to undergo an official test once a year. The cost implications are very large and once again undermine our sectors competitiveness"

> "A 28.8% proposed increase in fees will affect all sizes of business negatively, particularly small businesses. There are circa 1,500 egg producers with more than

1,000 birds (the threshold above which official salmonella sample is required to be taken once a year)"

Additional responses/comments

Two respondents commented that:

> "the UK Poultry industry has consistently reduced levels of Salmonella in flocks, so farmers should be rewarded by cost decreases which reflects good results experienced as opposed to the opposite position which seeks to increase costs"

One respondent expressed the view that:

> "the UK poultry sector feels aggrieved that in the pig sector, the prevalence of salmonella is very high; there is not the same level of effort being made to control levels of salmonella. This differing approach, with added higher costs undermines the good will and effort of poultry producers"

Government Response

Option 0

No respondent expressed a preference for this option. In any event, this is not a realistic option because it does not achieve the desired outcome of full recovery of costs, but provides a baseline against other options that can be assessed.

Option 1

One respondent expressed a preference for this option. Option 1 is not applicable for *Salmonella* NCP, as the rates implemented following the previous consultation were at FCR, based on methodology and costs of delivering the service at that time. The Government acknowledges the concerns of the respondents raised through the consultation.

Option 2

In total four respondents opted for this option. Two respondents expressed a preference for this option, to revise current fees to new FCR rates in 2015/16 (Note: now revised to 2018/19). Another two respondents also expressed a preference for this option, as there was not a 'Do not agree' option. Under this option, fees would be updated to the revised FCR methodology, including charging for travel time.

The fees for *Salmonella* NCPs across the sectors have decreased relatively; however, the new charges for travel time increase the overall fees. The refined cost-recovery model includes a method for staff travel time which can be applied in a fair and consistent manner, without disproportionately disadvantaging customers who live a greater distance

from APHA locations. APHA would charge customers travel time up to a capped ceiling of 90 minutes for a return journey from the nearest APHA Field Services Office.

The potential for OVs to undertake official sampling of breeding chickens on behalf of APHA staff is being reviewed by Defra, Scottish and Welsh Government officials in close co-operation with industry.

Defra will review best practice across the industry and, working with Scottish and Welsh Government officials, will review the approach accordingly, whereby good practice in the industry is recognised.

APHA acknowledges the comment regarding the typical fees example provided in the consultation document. A reworked example is provided at **Annex B** for clarification.

Option 2 would minimise the impacts on stakeholders (particularly small and micro businesses) whilst ensuring progress towards full cost recovery.

APHA has acted upon industry feedback, recently introducing a new invoicing system which generates one customer invoice to cover both aspects of NCP work, field staff visits and laboratory testing charges for official sampling completed.

Within the NCP programmes, small business thresholds apply so only larger producers fall within scope. Food business operators who fall under the threshold, only produce birds for private sales or only sell meat direct to consumers through farm gate sales are exempt from the NCP regimes.

Section 4: Border Inspection Posts (BIPs) questionnaire

Number of responses

Four questionnaire responses were received in relation to the BIPs proposed revision of fees together with three email/letter responses and one generic response that focused on all six statutory services covered in the consultation.

Breakdown of questionnaire responses

About you

How many people do you employ?

The two respondents each employ 0 – 10 people, so regarded as a micro business. Two respondents did not answer this question.

Which parts of Great Britain do you operate in?

The respondents operate throughout Great Britain. Two respondents operate in England only and one respondent operates in England, Scotland and Wales.

One respondent did not answer this question.

Our proposals

What is your preference for achieving full cost recovery between Option 1 *(revised fees as per the 2012 public consultation)* and Option 2 *(proposed revised fees using the new FCR model including charging for travel time)* and why?

Option 1

Two respondents agreed with the proposal to revise fees in line with the 2012 Public consultation. The respondents' views are summarised as follows:

Option 2 was deemed to be "far too high in which would, in turn, affect the amount of possible sales due to any cost increase being passed on to our customers"

One respondent reacted strongly against proposed increases believing:

> "the threat posed by non-EU Lepidoptera species is much overstated"

They contend that established practices for importing, rearing and breeding tropical species are centuries old, with historical incidence of problems very limited

> “thus current charging and any proposed increases represent an overreaction and are unjustified”

> “Hobbyists find the EU legislation oppressive, intimidating and invasive. Increased pricing and extra costs could motivate some to illegally bypass the APHA and send stock directly to home addresses. The honest ones will either pay the extra costs or cease the hobby altogether, and businesses, eg Butterfly Farms might find increased charges difficult to offset”

The respondent proposed:

> “APHA should either offer a low charge, or provide an alternative “opt-out” for non – invasive species”

Option 2

Two respondents agreed, with reservations, the proposal to revise fees using the new FCR model including travel time. The respondents gave the following caveats:

> “Opposition to all but the specific fee costs being charged”

> “Non-acceptance of salary costs, non-pay running costs or indirect costs being borne by the individual businesses. These costs are not within the control of the business operators and therefore should not be included”

Option 2 represents a cheaper option, as per the assumptions and example provided.

What do you see as the key risks surrounding the implementation of Options 1 and 2, their likelihood and impact?

All respondents identified the following risks:

> “The key risk is cost motivated, any increase would be passed onto the end user (general public) which could impact sales, this could have a negative impact on the amount of tax collected. So taking with one hand will detract from the other hand (Option 1 risk)”

> “Extra costs force up prices and it could prohibit importation and even cause the closure of businesses (Option 1 risk)”

> “Increased costs could encourage non-compliance and illegal imports”

> “Hobbyists will simply bypass the red tape and have insect species sent direct to their homes. (Option 1 risk)”

> “Research and study of species especially outside of the academia will be adversely affected as breeders opt not to import due to charges (Option 1 risk)”

Impacts on you

What would you expect the impact of revised fees to be on your profit margins and would you expect to absorb this cost/saving or transfer it to your customers?

One respondent commented that:

> "if costs are taken on-board it will no doubt impact on profit margins and could affect staffing levels"

They would look to pass on costs, however:

> "only if the customer accepts this" If customers are unwilling to pay, they would need to "rethink staffing levels as this would be the only way to off-set the increase"

Another respondent commented:

> "profit margins are already small; increasing the fees will make us less competitive with European suppliers and in-house breeders"

The respondent continued to express their view that:

> "costs have been created by the EU – why should we be the victims of such nonsense – we propose you send the bill to Brussels!"

Two respondents did not answer this question.

How do you think this fee revision will affect the demand for your goods and services? Increase demand, Decrease demand or No difference?

Two respondents reported that the fee revisions would decrease demand for their goods and services. Two respondents did not answer this question.

As a result of the revision of fees would you expect to reduce or increase the volume you trade in?

Two respondents expect the revision of fees to reduce the volumes of trade. The respondents provided the following explanations:

> "Most importers import in working hours and would not incur out of hours charges but due to our logistics needs we import from Singapore in the evenings to allow time for our delivery program to be implemented. We cannot undertake our delivery program if we bring out shipments into Heathrow during normal working hours"

> "Current charges are already far too high and any increase would prohibit importation"

Two respondents did not answer this question.

Other impacts

Do you consider that the revision of fees will encourage compliance with the regulations? Encourage compliance, Discourage compliance or No difference?

Two respondents consider that the revision of fees discourages compliance, and continued to explain their reasons as follows:

> "A blanket charge for species that have been imported into the UK for centuries is an unfair burden to put upon us. The vast majority of hobbyists and some businesses will opt to have insect species sent direct to their homes in order to avoid prohibitive charges"

Two respondents considered there will be no difference in compliance with the regulations.

One respondent stated:

> "all consignments enter through BIPs, so no opportunity for avoidance"

Are there any other impacts, not currently identified, that we need to consider? Are there any cumulative impacts arising from these revised fees against other current statutory charges?

One respondent cited:

> "cumulative impacts as a consequence of additional charges for the sector, eg. Charges for boxes to enter BIP, plant health charges, CITES charges and additional costs of delays"

One respondent cited the following impacts:

> "Hands on interaction with living creatures is paramount in fostering interest amongst young people in the field of entomology; to increase fees is to risk losing the next generation of practical entomologists"

The cumulative impacts identified by the same respondent include:

> "Loss of revenue for businesses
>
> Non-compliance by the majority
>
> Impact upon the next generation of entomologists"

Two respondents did not answer this question.

What are the impacts likely to be on micro and small businesses? (11- 49 employees = small; 10 or less = micro) Do you have any evidence of this and numbers likely to be impacted?

One respondent commented that although they did not have any evidence, after costing the additional charges anticipates that it may impact their business, specifically staffing levels, possibly one member of staff, if they are unable to pass the costs on. One respondent considers that they may have to stop importing completely, which would result in the closure of their livestock resulting in a loss of turnover of circa £40K. There was no evidence cited to support this comment. Two respondents did not answer this question

Additional responses/comments

The four respondents provided the following additional summarised comments:

> "The current cost is adequate for the service received"
>
> "Shipments arriving at the BIP marginally outside the rigid APHA operating times, (eg about 18.00hrs) should not be considered 'out of hours.' More flexibility to align with commercial activities should be considered"
>
> "Simply very disappointed. Hopefully we will leave the EU in 2017 and get some sanity back into APHA etc."
>
> "It is important for our national industry that BIPs operate efficiently and effectively as the veterinary checks represent a vital line of defence against pathogens and diseases coming in from non-EU countries. For the most part, one respondent would support charging importers as a way to discourage potentially threatening behaviours but avoiding the risks that overly expensive disproportionate charging would create. The charges must never reach a level that damages compliance"

A respondent posed the following questions:

> "What was the impact on compliance of the introduction of fees previously?"
>
> "What monitoring activity and reviews will be undertaken to ensure that the increased costs have no negative impacts on importer behaviours"
>
> "Which business sectors and business size will be impacted the most?"

Another respondent believes:

> "the majority of CVEDs issued for live animals at BIP's are for imported consignments of aquatic organisms. Among the members relying on imported aquatic organisms, there are also many SME's, though the ratio is uncertain"

It was also emphasised that one respondent's members:

> "…face cumulative costs including the BIP charges, the charges for boxes to enter the BIP, the cost of transferring boxes from airplane to the BIP, plant health and CITES charges. There are also additional costs directly related to any delays

caused by the process of clearance through BIP's both to the importer and possibly knock on effects on their customers"

Another comment was that:

"To grow, businesses have to be flexible and seek to maximise opportunities. It was accepted that for the ornamental aquatic sector, airports and thus BIP's, are vital conduits as almost all live animals and plants in which they trade in enter the UK via them. Being tied for least cost clearances to APHA office hours 08.30 to 17.00 at some of the busiest airports in the world constrains opportunities to trade flexibly"

They questioned:

"whether all other APHA services are constrained so rigidly by office hours?" but noted that "The reduced fixed fees for checking consignments were welcomed from £40 to £32"

One letter/email correspondence expressed the view that:

"BIPs should be state-funded to safeguard the importance of the work"

One respondent (who provided a generic response that focused on all six statutory services covered in the consultation,) was in favour of charging for the services.

One letter/email correspondence accepted that:

"the 'standard' charges must increase, but request AHPA to consider a variable fees for PETS travelling under Annex I Travel time costs were also challenged recognising that the Heathrow BIP has a resident Vet, which should facilitate a fixed fee"

One respondent submitted a consultation questionnaire and a letter/email to express their views on:

"specifically the cumulative costs faced by customers, out of hours charges being too rigid, and suggested increasing the charges in quarter hour blocks"

Also the point was made that:

"multiple loads mean multiple out of office charges even where this encompasses a single visit"

Government Response

Option 0

No respondent expressed a preference for this option. This is not a realistic option because it does not achieve the desired outcome of full recovery of costs, but provides a baseline against other options that can be assessed.

Option 1

Two of the respondents expressed a preference for this option. This is not considered an acceptable option for delivering the Government's objective of transferring the cost burden to users but provides a baseline against which the other options can be assessed.

Option 2

Two respondents expressed a preference for this option, to revise current fees to new FCR rates in 2015/16 (Note: now revised to 2018/19). Under this option, fees would be updated on the revised FCR methodology, including charging for travel time. For BIPs, the majority of fees would be reduced, with the exception of certain laboratory fees.

Option 2 would minimise the impacts on stakeholders (particularly small and micro businesses) whilst ensuring progress towards full cost recovery.

Defra is reviewing the operating procedures associated with the definition and interpretation of multiple loads and associated costs, to ensure there is clarity in their application.

Section 5: General comments

General comments relevant to all of the services under consideration were received from a number of respondents. These comments included:

Increased costs, including travel time – Several respondents expressed their views on the increase costs that now include travel time.

Government response - The HM Treasury guidance "Managing Public Money" explains that it is UK Government policy to charge for many publicly provided goods and services. Charging for services relieves the general taxpayer of costs, so that they are properly borne by users who benefit from a service. This allows for a more equitable distribution of public resources and enables lower public expenditure and borrowing. This has resulted in a subsidy for users and a financial cost to the general taxpayer. It is necessary to remove the public subsidy and relieve the burden on the general taxpayer. The proposal therefore is to charge fees to those using the services set out in the consultation document to achieve full recovery of costs, in line with UK Government policy.

Furthermore, HM Treasury have agreed to APHA's FCR model and the approach on charging for travel time, up to the capped ceiling. This includes:

- Capping the total travel time charge at 1½ hours which APHA believes brings the charge more in line with visit fees charged by private veterinary surgeons, to ensure that industry is not being unfairly penalised.

- APHA approach of capping travel would mitigate the impacts of charging on micro/small businesses and not disadvantage businesses located at a distance from APHA Field Offices or in remote rural areas.

- Total travel time would be charged from the APHA field office to the premises and return.

Transparency of the costs of services – A number of respondents expressed confusion on the breakdown of fees for *Salmonella* NCPs and for Bovine embryos, Bovine semen and Porcine semen (collectively known as Artificial Breeding Controls).

Government response – For *Salmonella* NCP work, **Annex B** to this Consultation Report clarifies sampling requirements for the five flock types and includes further worked examples that illustrate the various charging elements for each of the options set out in the Consultation Document to illustrate the overall differences between the three options for similar work activities.

For Artificial Breeding Controls, further clarification is provided under the Option 2 heading of the Government response at Section 1 above.

Combined visits – Respondents asked that APHA consider combining visits to stakeholders who have PHS, NCP and Compartments visits. This may reduce the costs on the poultry industry whist eliminating duplication of efforts by APHA officials

Government response – Comments concerning the viability of combining visits will be considered as part of Defra's Transformation programme. The remit includes reviewing all potential efficiencies in operation which would be reflected in the fee structures in due course. This is part of an ongoing programme of process improvement and efficiency savings across Defra. In conjunction with Scottish and Welsh Government officials, Defra will consider ways of streamlining the services provided and charged for, with the aim of further reducing costs and limiting where possible any future increases and ensuring best value for service users.

The way forward

The HM Treasury guidance "Managing Public Money" explains that it is UK Government policy to charge for many publicly provided goods and services. Charging for services relieves the general taxpayer of costs, so that they are properly borne by users who benefit from a service. This allows for a more equitable distribution of public resources and enables lower public expenditure and borrowing.

APHA understands some stakeholders would prefer not to see any increase in fees at this time. Any delay carries significant risk to the overall animal health and welfare programme. The funding for APHA as a result of the UK Government's Spending Review will continue to decrease over the period to 2020. Any further delay in moving to full cost recovery could therefore impact of the current level of service APHA provides both in relation to these statutory services and also other activities and subsequently lead to reduced animal and human health protection.

On this basis, APHA will continue to work towards revising fees through legislation. Fees would be revised to the new FCR rates for six statutory services: -

- Bovine embryos
- Bovine semen
- Porcine semen
- Poultry Health Scheme (PHS)
- *Salmonella* National Control Programmes (NCP)
- Border Inspection Posts (BIPs)

This option will achieve the objective of Full Cost Recovery (FCR) based on the Agency's revised methodology, whilst ensuring that costs are properly borne by users who benefit from a service.

Annex A: Consultation respondents

Aquasense

Aviagen UK Ltd

Bainbridge Vets Ltd

British Egg Industry Council

British Poultry Council

British Veterinary Association

Extraordinair Ltd

Genus Breeding

Lepidoptera Breeders Association

Moorland Veterinary Centre

National Farmers Union

National Pig Association

Ornamental Aquatic Trade Association Ltd (OATA)

Poulet Anglais

The English Guernsey Cattle Society

Annex B: *Salmonella* NCP – Proposed fees

Table 1

Fees payable by the person in charge of chicken or turkey holding from which an official sample is taken processed and examined.

Column 1 *Activity*	*Column 2* *Fee (£)*
Time spent in obtaining an official control sample for examination in a laboratory (in this table the "time fee") (in addition to the fees specified below, unless otherwise specified in column 2)	9 per quarter hour or part quarter hour spent
Time spent by an animal health officer travelling to and from premises for the purpose of activities below	14 per quarter hour or part quarter hour spent, up to a maximum of 84
Taking an official control sample from a chicken laying flock	32
Taking an official control sample from a chicken or turkey breeding flock	52
Taking an official control sample from a chicken broiler flock, or turkey fattening flock	72
Examination of an official control samples in a laboratory	14 per sample tested (time fee does not apply)

Table 2

Fees payable by the operator of a laboratory

Column 1 *Activity*	*Column 2* *Fee (£)*	
Processing an application for an initial laboratory approval or a biennial renewal of a laboratory approval	73	
Conducting inspections and quality assurance based upon the number of tests for which the laboratory is approved	One test	350
	Two tests	361
	Three tests	372
	Four tests	384
Conducting collaborative testing for *Salmonella* as required to obtain and maintain approval as a testing laboratory	34 per test	

Table 3

Fees payable by the person in charge of poultry flocks for conducting tests under point 4(b) of Part D of Annex II of Regulation (EC) No.2160/2003

Column 1 *Activity*	*Column 2* *Fee (£)*
Conducting tests on seven dust and faecal samples taken from each flock	99
Conducting bacteriological sampling and testing of the caeca and oviducts of 300 birds from each flock	2,470
Conducting bacteriological sampling and testing of the shell and the content of 4,000 eggs from each flock	3,080

Annex C: Poultry Health Scheme – Proposed fees

Table 1

Fees for registration and approval of an establishment for the purposes of the poultry health scheme

Column 1 *Activity*	*Column 2* *Fee (£)*
Time spent by a veterinary officer carrying out the activities in this Table (in this table the "time fee") (in addition to the fees listed below unless otherwise specified in column 2)	16 per quarter hour or part quarter hour spent
Time spent by a veterinary officer travelling to and from the premises of a poultry health scheme member (in this table a "scheme member") for the purpose of activities below	21 per quarter hour or part quarter hour spent, up to a maximum of 126
Annual registration as a scheme member	55 (time fee does not apply)
First year approval of scheme member's flock or hatchery, or combined flock and hatchery on one site, where the inspection is carried out by a veterinary officer	27
Annual re-approval of a scheme member's flock or hatchery, or combined flock and hatchery on one site where inspection carried out by a veterinary officer	56
Additional site re-approval where a scheme member applies at the same time for multiple sites, and the inspection is carried out by a veterinary officer	31
Annual re-approval of a scheme member's flock or hatchery, or combined flock and hatchery on one site, where the inspection is carried out by a veterinary surgeon who is not a veterinary officer	54 (time fee does not apply)
Additional site re-approval where a scheme member applies at the same time for multiple sites, and the inspection is carried out by a veterinary surgeon who is not a veterinary officer	29 (time fee does not apply)

Table 2

Fees payable by the operator of a laboratory in relation to approval for the purpose of the poultry health scheme

Column 1 *Activity*	*Column 2* *Fee(£)*
Processing an application for an initial laboratory approval or a biennial renewal of a laboratory approval	73

Proficiency test in respect of Salmonella bacteriology (*pullorum, gallinarum and arizonae*)	146 per test
Proficiency test in respect of Salmonella serology (*pullorum, gallinarum*)	321 per test
Proficiency test in respect of Mycoplasma chicken serology (*gallisepticum*)	321 per test
Proficiency test in respect of Mycoplasma culture (*gallisepticum and meleagridis*)	389 per test
Proficiency test in respect of Mycoplasma turkey serology (*gallisepticum and meleagridis*)	387 per test

Annex D: Bovine semen – Proposed fees

Fees payable by applicants and operators under the 2007 Regulations

Column 1 *Activity*	*Column 2* *Fee (£)*
Time spent by a veterinary officer carrying out the activities in this Table (in addition to each of the fees listed below)	16 per quarter hour or part quarter hour spent
Time spent by a veterinary officer travelling to and from premises for the purpose of activities below	21 per quarter hour or part quarter hour spent, up to a maximum of 126
Considering an application for approval of a bovine animal under regulations 7 and 10 of the 2007 Regulations for use in domestic collection centre or at unlicensed premises	20
Considering an application under regulation 7 of the 2007 Regulations for approval of a bovine animal for use in an EU collection centre	26
Considering an application for a licence to operate an EU quarantine centre under regulation 4 of the 2007 Regulations	29
Considering an application for a licence to operate an EU or domestic collection centre, or EU or domestic storage centre under regulation 4 of the 2007 Regulations	27
Conducting an examination of a bovine semen centre under regulation 40 of the 2007 Regulations	17
Conducting a routine examination of an approved bovine animal for domestic or EU use	23

Annex E: Porcine semen – Proposed fees

Fees payable under the 1964 Regulations and the 1992 Regulations

Column 1 *Activity*	*Column 2* *Fee (£)*
Time spent by a veterinary officer carrying out the activities in this Table (in addition to each of the fees listed below)	16 per quarter hour or part quarter hour spent
Time spent by a veterinary officer travelling to and from premises for the purpose of activities below	21 per quarter hour or part quarter hour spent, up to a maximum of 126
Application for approval of a boar to provide semen for the purpose of artificial insemination	
Considering an application for the approval of a boar under regulation 2(1) of the 1964 Regulations for the purpose of the collection of semen which may or may not be subject to intra-EU trade	31 per boar.
Routine testing of a boar	
Routine testing of a boar on an artificial insemination centre(1) from which semen may or may not be subject to intra-EU trade	23 per boar.
Operation of an artificial insemination centre(1)	
Considering an application from an operator for an artificial insemination centre licence or approval	27
Considering an application for approval of an alteration to licensed premises (in accordance with conditions attached to the licence)	25
Routine examination of artificial insemination centre(1)	17

(1) "artificial insemination centre" means premises in respect of which a licence is in force under regulation 4(1) of the 1964 Regulations, or which have been approved under regulation 2(2) or (3) of the 1992 Regulations"

Annex F: Bovine embryo (collection, production and transfer) – Proposed fees

Fees payable under the 1995 Regulations

Column 1 *Activity*	*Column 2* *Fee (£)*
Time spent by veterinary officer when carrying out the activities listed in this table (in addition to each of the fees listed below)	16 per quarter hour or part quarter hour spent
Time spent by a veterinary officer travelling to and from premises for the purpose of the activities below	21 per quarter hour or part quarter hour spent, up to a maximum of 126
Considering an application for approval or re-approval of: - a bovine embryo transfer team; - a store under regulation 13; - a store under regulation 16; - a store and its supervisor under regulations 16 and 19, of the 1995 Regulations; or - a single bovine embryo collection or production team (with or without an inspection of a laboratory)	28
Considering an application for approval of each additional laboratory or store from the same applicant where the inspection is completed on the same day	9
Considering an application for re-approval of a laboratory or a store following any alterations	25
Carrying out routine inspection of records of a single bovine embryo production, collection or transfer team and re-inspection of a single laboratory or store	17
Carrying out routine inspection of records of each additional bovine embryo production, collection or transfer team, and re-inspection of each additional laboratory or store	4 for each additional team and laboratory or store

Annex G: Checking consignments of live animals from third countries at border inspection posts – Proposed fees

Table 1

Fees for inspecting consignments of animals from third countries and checking importation documentation at border inspection posts in accordance with regulation 15 of the 2011 Regulations

Column 1 *Inspection of type of animal and checking documents*	*Column 2* *Fee (£) per consignment*
Poultry and small game birds	65
Poultry eggs	38
Ratites	65
Captive birds	64
Live fish, aquatic animals and bees	32
Rabbits and rodents	29
Other insects, invertebrates, reptiles and amphibians	26
Pets unaccompanied by a declaration	57
Equidae	62
Farmed livestock including cattle, sheep, goats, camelids, pigs and wild boar	146
Animals not covered by any other category	55
Transhipment check of documents	52

Table 2

Fees for extra inspection checks due to non-compliances or additional control measures

Column 1 *Person undertaking extra check*	*Column 2* *Fee (£) per quarter hour or part quarter hour spent*
Veterinary officer – out of hours[(1)] checks	17
Veterinary officer – checks at weekends or public holidays[(2)]	23
Veterinary officer – checks at all other times	11
Time spent by a veterinary officer travelling to and from premises	16 up to a maximum of 64 per visit

[(1)] "out of hours" means before 8.30 a.m. or after 5 p.m. on a weekday.

(2) "public holiday" means Christmas Day, Good Friday or a bank holiday in England under the Banking and Financial Dealings Act 1971(**1**).

Table 3

Additional fees for certain inspections

Column 1 *Period when inspection conducted*	*Column 2* *Fee (£)*
Out of hours(1) inspection	140 per load(2)
Inspection during a weekend or a public holiday(3)	185 per load(2)
Time spent by a veterinary officer travelling to and from premises	16 per quarter hour or part quarter hour spent, up to a maximum of 64 per visit

(1) "out of hours" means before 8.30 a.m. or after 5 p.m. on a weekday.

(2) "load" means one or more consignments of animals from the same country of origin that have arrived on the same means of transport and presented by a person responsible for their importation for checking at the border inspection post at the same time.

(3) "public holiday" means Christmas Day, Good Friday or a bank holiday in England under the Banking and Financial Dealings Act 1971.