



# Environment, Food and Rural Affairs Committee

## Oral evidence: Animal and plant health, HC 611

Tuesday 4 February 2025

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[Watch the meeting](#)

Members present: Alistair Carmichael (Chair); Sarah Bool; Charlie Dewhurst; Helena Dollimore; Sarah Dyke; Jayne Kirkham; Josh Newbury; Jenny Riddell-Carpenter; Tim Roca; Henry Tufnell.

Questions 1 - 74

### Witnesses

**I:** Helen Buckingham, Chartered Environmental Health Practitioner and Regulatory Consultant, OneResolution; Lucy Manzano, Head of Port Health and Public Protection, Dover Port Health Authority; David Smith, South-East Regional Director, Border Force.

Written evidence from witnesses:

– [Dover Port Health Authority](#)



## Examination of witnesses

Witnesses: Helen Buckingham, Lucy Manzano and David Smith.

**Q1 Chair:** Good morning, everybody, and welcome to this meeting of the Environment, Food and Rural Affairs Committee. Our evidence session this morning is part of our inquiry into animal and plant health, featuring biosecurity at the border.

I should say that we have one witness joining us online this morning. Helen, you are very welcome. I hope that the technology is robust enough for you to contribute. I am always aware that, when you are the person online and everybody else is in the room, it can be a little bit frustrating. If, at any point, you are wanting to intervene and have something to add and you are not getting in, then please do not hesitate to bring it to my attention.

Can I invite all three witnesses to introduce themselves to the Committee this morning for the benefit of the official report and for those who are watching our proceedings?

**Helen Buckingham:** Good morning, everyone. Thank you for this opportunity to address you today and also for accommodating me on screen, as I recover from a leg injury. Thank you for that.

My name is Helen Buckingham and I am a chartered environmental health practitioner of 30-plus years, half of that spent in local government, including as a director of multiple regulatory services. I have also spent 11 years working in central Government on regulatory policy and engagement across Whitehall. For the last seven years, I have run my own business as a regulatory consultant, where I have specialised in imported food control, working closely with the Food Standards Agency and the Chartered Institute of Environmental Health and Chartered Trading Standards Institute, amongst others.

I returned to the floor in 2021 and went to head up environmental services and port health for East Suffolk Council, which, of course, includes the enormous port of Felixstowe and Harwich as well. I speak to you today in the hope that I can help answer your questions from my own personal perspective, not as a representative of any other organisation I work for. Thank you.

**David Smith:** Good morning and, again, thank you for the opportunity to come along today and talk to you about the issues at hand. My name is David Smith. I am a regional director with Border Force and I am responsible for the south-east region. The south-east region includes the port of Dover and the inland border facility at Sevington, but I am actually representing Border Force at a national level as well as my day job.



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I have been in Border Force and its previous incarnations for 40 years. I started my career in Dover and I have worked through all the grades at various different locations.

**Lucy Manzano:** Good morning and, again, thank you very much for inviting me here today to give evidence. My name is Lucy Manzano. I am head of the Port Health and Public Protection Service at Dover District Council and Dover Port Health Authority. I have worked in local government for 25 years, specialising in food safety, public health and port health matters. I am responsible for the port health function at the Port of Dover and, indeed, the frontier for the Channel Tunnel.

Q2 **Chair:** For those of you who have submitted written evidence, we are very grateful and thank you for that. Helen, can I come to you first of all? Can you offer us an outline of the risks associated with smuggling animal products into the UK and where the greatest risks are identified as coming from?

**Helen Buckingham:** In the context of imported products of animal origin, POAO, which we are talking about in this session, along with live animals, biosecurity risks come from a range of agents that affect animal health, food safety and public health. They are the three pillars, if you like, of what we are talking about today. Animal health examples include the viruses of foot and mouth, African swine fever and sheep and goat pox, which can, of course, be very unpleasant for the animals themselves, as well as being devastating to our farming industry.

Food safety risks, the second category, mainly come from bacteria, viruses and parasites, and of course there are chemical and physical risks too. Zoonotic diseases are the ones that we are really concerned about today, because they are the ones that spread between animals and humans at any point in the food chain. This happens via the consumption of meat that has been contaminated by bacteria, viruses and parasites, often from the intestines during slaughter or having been fed contaminated feed during processing or during handling by infected food handlers.

Many of those zoonotic diseases are commonly found in the intestines of healthy, food-producing animals and they include bacteria such as campylobacter, salmonella and E. coli. They also include viruses such as rotavirus, hepatitis A and hepatitis E, or parasites such as trichinella, cryptosporidium and giardia. There are significant and widespread public health threats from these zoonotic diseases in particular, which are often underestimated globally, according to the World Health Organisation.

For us today, it is very useful and, indeed, important to remember that the movement of meat carries risks to animal health and public health in equal measure. That is a key part of your consideration, I am sure.

Q3 **Chair:** On the question of movement, you have what I would call commercial-scale movement and then there is the question of personal



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allowance in some of these things. Can you talk us through that distinction?

**Helen Buckingham:** Both routes are governed by legislation. In this space, whenever anyone hears the word “legislation”, we often think of bad things such as red tape and how terrible it is, but if ever there was a need for regulation, be it on the commercial import or the personal import, I would hope that biosecurity is one of those reasons. In fact, I know from my time working in regulatory policy that legitimate businesses like having regulation when it is sensible, it does good things and it helps create a level playing field. That, of course, is good for growth.

Yes, there are controls over the commercial SPS checks, the official way in which goods are brought in, and there are also rules that govern personal imports. I could talk about each of those for about a day at a time, if you like, or I can narrow it down a bit.

Q4 **Chair:** I can assure you we have enough lawyers on the Committee who are not scared of legislation. The current risk, then, of an outbreak of African swine fever or foot and mouth disease would probably be the most concerning to the Committee. Where would you assess that?

**Helen Buckingham:** On African swine fever, the DEFRA outbreak assessment of July 2024 is one of the most current risk predictors that we have. It assesses the risk of African swine fever entering GB as medium risk via commercial channels but, even in that report itself, when you look at the human mediated pathway of non-commercial imports—our illegal personal import route—that risk changes to high, which means it occurs very often.

African swine fever, as much as some of these others, is highly transmittable. This stuff lives in a pate, in a sandwich. Chucked out of a window, it can survive for months. Personal imports were always intended for you and me coming back from our holidays with a bit of pate in the suitcase. They are small amounts, they are controlled, but what we are seeing here, and what Lucy will talk to you about, is vast quantities, exploiting the personal import loopholes. For African swine fever, the risk is medium for commercial channels but currently, to the best of my research, it is still high risk for this illegal personal import route.

Foot and mouth disease, of course, was last seen in the UK in 2001 and cost £8 billion. Germany has recently lost its foot-and-mouth-free status. An outbreak was confirmed on the 10th. Import regulations were changed on the 11th. The IT system, unfortunately, took a few days to catch up and personal imports were also introduced quite quickly. Only yesterday we had PPR introduced as a new one from Hungary. Imports of sheep and goat commodities were suspended only yesterday. Interestingly, there is no personal import limit allowed with that one.



To be honest, Chair, if you look at the .gov topical issues list for all these mainly animal health risks that we are talking about here, we have avian influenza, sheep and goat pox, small hive beetle in Sicily threatening our bees, epizootic haemorrhagic disease, chronic wasting disease and lumpy skin. There is lots of it out there. We have to protect our biosecurity via the official channels and via the personal ones to keep all of these things out, as well as public health diseases.

**Q5 Chair:** Lucy and David, do you have anything to add to what you have heard from Helen there?

**Lucy Manzano:** I would like to add something. I think the risk is high from what we are seeing. It is really important that we recognise the intrinsic link between personal imports and that of commercial imports, and how the implementation of the BTOM is contributory, from what we are seeing at the front line, to these escalating numbers of illegal meat that are presenting. We are looking at this in an environment that is entirely inappropriate in terms of containment of the risk.

That is why it is imperative that these controls take place within a BCP for containment. After all, the very purpose of import controls is to keep the bad stuff out and contain it at the first point of entry, making sure that, if it is going back out, it goes out from that point of entry. From what we are seeing, my conclusion would be that it is high and that action is needed promptly to get on top of the illegal personal imports route, but also what we are seeing and have evidenced is coming through via the commercial routes as well. The BTOM, of course, was designed to eliminate that.

**Q6 Chair:** David, could you outline the role of yourself and your colleagues in this?

**David Smith:** Border Force works with DEFRA as its strategic partner to apply the controls that are currently in place on personal imports. Border Force is responsible for the frontline interdiction of personal imports. We do that as part of our wider role. There are a whole range of prohibitions and restrictions that we manage at the border and we treat POAO in exactly the same way as we do our other responsibilities.

Border Force is responsible for the interdiction, as part of our intelligence-led, targeted approach at the border. We use intelligence and data from a wide range of partners, particularly from DEFRA, to apply the controls at the border. We are also responsible for trade facilitation, as well as our anti-smuggling duties. It is a balance of checks at the border in conjunction with trade facilitation and not causing impacts to the wider UK economy as a result of that.

That is our broad responsibility. In terms of commercial imports, I have officers based in Sevington, in our border facility, but our role in commercial importation is fundamentally around fiscal checks, not around



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any of the animal and products of animal origin checks that take place there.

**Q7 Chair:** Are you content that you are properly resourced for that?

**David Smith:** That is a very good question. No operational leader would sit here and tell you they could not use more resource, but the border is a complex beast. We have a lot of checks to do at the border and we do them in a very confined infrastructure, with limited resources, but we do them in a way that is structured in the same way as we do our other prohibitions and restrictions. We work across Government to gather the best intelligence.

DEFRA is responsible for providing that intelligence to Border Force through an agreed structure and then that information goes to our frontline staff, who then apply the controls in the most appropriate way, balancing the control regime and impacts on flow with resource and the priorities that are clearly discussed in our prioritisation process.

**Q8 Chair:** You have all outlined very well the challenge facing us here. We are going to drill down piece by piece into the various elements that you have outlined. Just before we do that, can I come back to you, Helen? What risk does the outbreak of foot and mouth disease in Germany that we saw recently pose to the UK?

**Helen Buckingham:** I am probably not the right person to answer that. I would just refer you to previously published documentation. There is plenty of it written out there. We know how much it costs. We know the devastating consequences of it. No one wants to see that happen again and we can keep it out with the right tools in place.

**Q9 Chair:** Can you remind me: was it four days it took to close the borders effectively to German meat imports?

**Helen Buckingham:** Colleagues in the field tell me that the announcement came on the 10th. The import restrictions were changed on the 11th. The IPAFFS update—IPAFFS is the system on which things are notified and paperwork is moved around—took another seven days and, in that time, things got through. That was rather remarkable. I was getting calls from inland authorities, saying, "Hang on a minute. I have just had some German whey product turn up. What do I do with it?"

That really opened the doors to the vulnerable state we have, because we do not have enough clear communication coming down the pipe from central Government about what to do. My BCP colleagues will tell you that the guidance about what to do and how to deal with this stuff did not come through quick enough. There is a 2011 handling plan online still from DEFRA about what to do in these situations, and yet up-to-date guidance took a while. That was worrying for me.

**Chair:** Lucy, you are nodding there.



**Lucy Manzano:** I would like to just add one point on that. We are aware that for at least six days German products were able to auto-clear the very systems designed to detect them and to remove them. Products within scope of the FMD controls were able to auto-clear the system via TODCOF.

**Chair:** We will come back to that, I suspect.

Q10 **Sarah Dyke:** Leading on from that, stats show that the DPHA only provides 20% of operational coverage at the Port of Dover, which may explain why we had recent problems, as you have just described. It has been said that the seizures you are making are just the tip of the iceberg. Only 0.2% of the vehicles arriving are being looked at. The Border Force seized 70,000 kilos of meat in 2023-24 and it has dramatically gone up. In January 2025, the stats are at 22 tonnes. Why has that figure increased so dramatically?

**Lucy Manzano:** Just to clarify on a couple of points, the operational coverage that we provide at the port is not connected to the auto-clearance of the goods. They are completely different. These goods are being auto-cleared by TODCOF via the commercial routes and the systems that DEFRA have put in place to deliver the BTOM.

The figures that you refer to were provided without greater detail. For all of us, that is how they came. The figures very clearly tell us that, from the 70 tonnes that were seized here, from Border Force's records, approximately 69 tonnes were seized by Dover Port Health Authority. When the safeguard measures came in and DEFRA started to fund Dover Port Health Authority to carry out these checks, that is where we see the increase in volume, because we are proactively in the port.

Even during that 20% minimal operational coverage, we are focusing our resources on vehicles most likely to be carrying this illegal meat. That is where we are seeing that sharp increase. Coincidentally, that sharp increase has occurred since the BTOM has been implemented.

Q11 **Sarah Dyke:** That is really interesting. You are being more proactive on 20% coverage. We know there is another 80%. Those figures then become quite stark, do they not? What trends are you identifying in the nature and scale of the problem?

**Lucy Manzano:** The fundamental thing is that it is going up. I have been involved in port health for over 20 years and there has definitely been a change in the presentations we are seeing, most notably from goods arriving from the EU. We fall under this umbrella, this assumption that, if it comes from the EU, it must be of the equivalent standard of what we are seeing.

We have seen a huge deterioration in just basic hygiene presentation of this meat that is hugely cheap. There is money to be made, so these presentations have gone up and up. Where they started off quite small, we are seeing vehicles that have been adapted or coaches without



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passengers, as a simple example, that are full of products of animal origin. These are really quite startling. The trend is that it continues to rise. If we are taking this out with only 20% just at Dover, it gives some indication of everything else that is coming through.

On one ferry, for example, you could have 80 vans coming through. That is a lot of work. If we are going to crack this, we have to have a strategy. We have to get this food off the lanes. We are looking at this food on those live tourist lanes that you would have all travelled through when you have done your holiday. They were not designed to be pulling out tonnes of bloody, wet, dirty meat that cannot be contained or washed down. As an example, at a BCP, goods from Germany may not necessarily be able to be broken down, because the risk is recognised to be great, but it is absolutely okay and accepted for Dover Port Health Authority to be rummaging through these vans. How is that appropriate? We need to do it. We need to take it out of the food chain, but it is not done in a contained environment.

The two do not match. We have a BCP at the top of the hill built for this very purpose, in terms of containing the bad stuff, being run to temperature, that we are not able to access. If we could get these vans off the lanes, up to the BCP, we could offload them in an appropriate area, carry out prosecution work and start charging these people.

Q12 **Sarah Dyke:** How would you implement that strategy?

**Lucy Manzano:** Because of how close the BCP is, we would direct the vehicles either through escort or seal up to the facility.

Q13 **Chair:** BCP means "border control post".

**Lucy Manzano:** Yes. Apologies.

Q14 **Sarah Dyke:** Why is that not being done now?

**Lucy Manzano:** DEFRA will not give us access or allow us to operate in that part or in any part of the BCP.

Q15 **Chair:** You have an onsite facility in Dover that you could use. To read your evidence short, you would like to use it, but you are not being given access to it.

**Lucy Manzano:** Exactly, and we have relentlessly requested that.

Q16 **Sarah Dyke:** Thank you, Chair, for clarifying. That is where we were getting to. Helen has talked about the exploitation of those personal limits. What percentage comes through on those personal versus commercial imports? Are you checking? What estimate have you made of the volume of meat that has not been intercepted, going back to that 80% that is still coming through unnoticed?

**Lucy Manzano:** If we consider that, across the short straits, there are about 16,500 inbound vehicle movements each day and any vehicle could be carrying meat that is prohibited, the volumes are, of course,





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potentially huge. For those that come under the guise of personal imports, it is not like an airport. This is not a neat presentation with a restricted weight. You have a vehicle. You can load it up at your own discretion. That is the very reason why we are seeing these huge quantities.

It is certainly not what I would describe as people being confused about what can come in. There is vast money that can be made and, of course, our farmers cannot compete with cheap meat. Many people will be unaware, because of the cost of living crisis and everything else, that the meat that they are eating may not have been appropriately checked, because of the ability to now arrive via the short straits and not have full checks conducted.

Q17 **Sarah Dyke:** David, is there anything that you wanted to come on to from a border control perspective?

**David Smith:** We are talking specifically about Dover, but I will cover more generally as well. I recognise everything that Lucy has said. While my colleagues from PHA are not available all the time in Dover, Border Force maintains its levels of checks. In that process, we detect meat that we deal with. There are two ways to deal with any illegal meat importations from a personal perspective. One is to refer to port health authorities, which then process the seizure to conclusion.

The other way is that Border Force can actually seize the goods under Section 49 of CEMA. Even where port health are not available, Border Force do not and cannot ignore importations of meat that fall as illegal. We will deal with them when we find them. It is not just port health doing these checks. Border Force will do its normal checks, based on intelligence, and then we will deal with whatever we find, if it is a prohibition. That goes for the range of prohibitions in place, including drugs or whatever that may be.

Q18 **Chair:** To what extent, then, are the seizures that you are finding down to the intelligence that your intelligence-led model is receiving and using?

**David Smith:** I cannot answer that question.

Q19 **Chair:** It sounds to me that what Lucy is describing is good old fashioned stop and search.

**David Smith:** Let me try to explain. ASF checks were introduced in 2022. We work really closely in Dover together. We found a fairly significant increase in meat importations. That gives an indication, data and more intelligence that then leads to further success. You are actually right that more activity leads to success, but some of the increase we are seeing nationally is down to that process, where we detect, we digest the information and the intelligence, and then we put that back out to frontline officers.

Q20 **Chair:** We will come back to the success later. Is there a role for



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deterrence here?

**David Smith:** There is a role for deterrence, yes, absolutely.

Q21 **Chair:** Do you think we are meeting that role?

**David Smith:** That is a good question at the moment. Border Force does everything it can with the current structures and resources that it has in place. We have a very good working relationship with DEFRA and I can explain the structure of our working relationship and how that information is shared, if you would like me to.

**Chair:** But that does not necessarily help us right at the moment.

**David Smith:** No.

Q22 **Sarah Dyke:** Bearing in mind that there is a facility and a strategy that could be implemented, has the Secretary of State or any of the DEFRA ministerial team undertaken or planned to undertake a visit to Port of Dover?

**Lucy Manzano:** No, not to the Bastion Point facility. DEFRA has not visited the exact activities we are talking about, the illegal meat activities, since they were put in place in 2022.

I would just like to add a point in terms of the volumes to help clarify. The volumes that you have referred to are the national volumes of seizures. For the 70 or 71 tonnes in 2023-24, the best part of 69 of those tonnes were removed by Dover Port Health Authority. That is from the national figure. Only two tonnes were removed outside of Dover, or potentially within Dover but outside of the operation that DPHA was providing. That is an important point to clarify.

**Helen Buckingham:** I just wanted to come back on something Lucy said, because she is being predictably humble about the work that her and her fantastic team do. Lucy did not make the point loudly enough, if I may say, that this is actually a Border Force role we are talking about here. Border Force is paid to take control over illegal personal imports. The only reason that Lucy and her team are alongside is because DEFRA occasionally gives them some money to go and stand next to Border Force and look at this stuff.

It is my understanding, having spoken to several border control posts this week, just to check my facts, that, even where Border Force have permanent teams in situ, they do not, of their own volition, go and look for food. If they find illegal personal food, it is a happy accident. It is not something that they go and look for.

Chair, you mentioned a deterrent. It is also my understanding that most of this stuff is just taken away as voluntary surrender. Yes, the importer, the criminal in this case, has lost the value of their consignment, but, no, there is no punishment, because the legislation is a bit confusing and difficult in this space, as it is for much of port health.



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In Harwich, on my own doorstep, with the ro-ro ferry, DEFRA happened to give some money to the port health team at East Suffolk Council, at Suffolk Coastal Port Health Authority, who look after Harwich for port health purposes, to go and stand with Border Force for a part-time, short project to look at this stuff. It was exactly on a par with what Lucy is doing at Dover. Monday to Friday, they could fulfil it. They could stand with Border Force. They could stop vehicles. They could look at what was coming in and, yes, they were finding stuff. Again, it was the tip of the iceberg.

Of course, the project only ran from Monday to Friday in the mornings. What did the criminals do? They waited until the weekends and brought it through. We know that is the case. It is only really Harwich, Felixstowe and Dover that have benefitted from this money. It is temporary; it is knee-jerk; it is short term. If port health authorities were not there, Border Force would not be looking at it anyway. All of this stuff gets through and it is the inland local authorities—22 in Wales, 32 in Scotland and 300 or so in England—that are then picking this stuff up. That is a completely ignored dimension in the design of all of this so far.

Q23 **Tim Roca:** In terms of the stats on seizures, there were 5,500 in 2015-16 and then 2,000 in the latest recorded year. Are those seizures nationally or seizures at Dover?

**Lucy Manzano:** Sorry, which figures are you reading?

Q24 **Tim Roca:** I have a briefing here saying that data shows a general trend towards fewer individual seizures, with 5,500 in 2015 and 2,000 in the latest recorded year. Will that have been at Dover or are those national figures? I do not know if you recognise those figures.

**Lucy Manzano:** That would be national. I am not sure which specific figures you are reading.

Q25 **Tim Roca:** It will be a briefing that we have had. I suspect those are national figures. That decline is quite substantial in and of itself. I was looking at an NAO report from 2003, where there were 15,800 seizures in that year. The trend over the last 20 years has been significantly downwards. Can you comment on why that is?

**Lucy Manzano:** Up until 2022, that responsibility rested solely with Border Force.

Q26 **Tim Roca:** You cannot comment.

**David Smith:** I cannot comment on those previous figures, sorry, no.

Q27 **Tim Roca:** Even in recent years, there has been a sharp decline in the number of seizures.

**David Smith:** We do not publish port-specific data. At national level, I can speak to the last three calendar years. In 2022, there were approximately 2,400 seizures and 128 tonnes were seized. In 2023, there



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were approximately 2,900 seizures and 164 tonnes. In 2024, there were approximately 2,600 seizures and 235 tonnes. That is encompassing all elements of Border Force's work at the frontline, including any that we process on behalf of other agencies, including Lucy's teams. They would be in those figures, because Border Force finishes the process. When we seize meat at the border, it comes back into Border Force to be secured and then disposed of as part of the agreement between Border Force, port health and DEFRA.

Those figures will be all POAO seizures in the UK over those three years and they are approximate, but they are based on our database, which collates all of those figures.

Q28 **Tim Roca:** Can I ask about prosecutions? How many people are pursued and prosecuted?

**David Smith:** Border Force does not have responsibility for prosecution in any of our prohibitions and restrictions. That is a question for DEFRA. DEFRA has the policy and is responsible for the prosecution policy.

Q29 **Jenny Riddell-Carpenter:** I just want to briefly pick up on something Helen just mentioned. A lot of the focus, perhaps understandably, is on the Port of Dover. You mentioned briefly about Harwich and then slipped in Felixstowe. For Felixstowe, the trade is more significant and I am interested as to why you alluded to Harwich receiving more funding for DEFRA to stand beside Border Force. Why would Felixstowe not be in that focus?

**Helen Buckingham:** Felixstowe has done some limited work, but Harwich is where the ro-ro ferries come in. Ro-ro ferries have personal individuals and personal vehicles coming back from the weekend. That is more of a magnet. Felixstowe is a commercial environment. If we are looking for personal smuggled, Harwich, with the ro-ro ferry, was the better place to go and that is where the money has been going to.

Q30 **Jayne Kirkham:** I will ask this now, but it is probably a question more for later. You talk about the BCP not being at Dover. That was a DEFRA decision, obviously. Do you have any idea what the rationale was for moving it 22 miles inland and if, at some point, that could be changed or reversed? How difficult would that be?

**Lucy Manzano:** The decision not to open the Dover BCP at the point of entry and exit was not based on biosecurity. It was based on incorrect numbers, volumetrics, about what was coming through the short straits, and we relentlessly challenged DEFRA on the numbers to help assist it in understanding the complex nature of what comes through the short straits.

The BCP was built to be able to process the full volumes for the short straits. It was not until 9 November 2023, just two months before the first part of the BTOM came online, that we received a call and were told by DEFRA that the BCP, and indeed the port health authority, with



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statutory responsibility to safeguard the nation, would not in fact be needed. DEFRA had concluded that, indeed, fewer checks would be required at the border, at the exact border where approximately 40% of all POAO that is imported into this country is arriving.

They provided no impact or risk assessment to clarify that decision and/or any confirmation of how food would be controlled at the point it arrives or, more importantly, between the point it arrives and the inspection facility that is accessed 22 miles away, across to other local authorities. The start and the facility itself would be operated without any connection at all between them.

DEFRA has continually stated that there are robust controls in place. There are not. They do not exist. It has overstated the activities of Border Force at the border to identify commercial goods. It implies that there is some form of sifting taking place at the border to identify food. It continues to refer to illegal checks taking place at the point of entry and only legal goods going forward to a BCP, accessed without control 22 miles away and, most importantly, not replicated at any other point of entry into the UK.

That is why we are confident and have presented evidence very clearly to DEFRA, and indeed to the Food Standards Agency, to demonstrate that the systems in place to safeguard this country from a biosecurity point of view, the absolute cornerstone of import controls—keeping the bad stuff out—is not working. We have to action change. It is not acceptable to continue along the lines of simply saying, “We are maintaining biosecurity. There are robust systems in place”.

The port health authority at the point of entry has had no contact with DEFRA. We have referenced intelligence and DEFRA feeding into Border Force. We have mentioned prosecutions, et cetera. We are delivering this service. We have had no direct contact with DEFRA. We are in and responding to the foot and mouth outbreak in Germany and yet, alarmingly, we have had no direct contact with DEFRA about what is happening at the frontline and what controls we are carrying out. It has been over three weeks; it is just about to turn four. That remains the biggest obstacle to delivering biosecurity that we currently face.

Q31 **Chair:** It sounds to me like they are not going to talk to you because they think they might hear things they do not want to.

**Lucy Manzano:** I think you are completely correct.

Q32 **Charlie Dewhirst:** I wanted to come to David in terms of Border Force priorities and where animal and plant disease incursion risk sits in your priorities and day-to-day work.

**David Smith:** It might help if I explain the structure first and how we work with DEFRA and other agencies to apply our controls at the frontline. The model is broadly the same for whatever agency we are dealing with, whether that is to deal with illegal meat or illegal drugs. We



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have a steering structure at the strategic level. We have a quarterly meeting with whatever agency we are dealing with—in this context, DEFRA—and a range of stakeholders, which identifies our strategic approach in Border Force.

That conversation also agrees our prioritisation and how much effort we put into each of those types of work, whether that is Class A drugs with the NCA or illegal meat with DEFRA. That quarterly meeting takes place on a regular basis. We then have a more specific commodity-based meeting, which is called the border steering group. That is the same. That is three-monthly, quarterly, and at that meeting we will have attendees from DEFRA, Food Standards Agency and the National Food Crime Unit. That meeting is specifically focused and looks at our priorities for illegal meat, in this context, to be applied at the border.

Both of those meetings will include any discussions or exchanges around intelligence and how we apply that at the border. Those are given as instructions, in the form of specific instructions to frontline Border Force staff about the controls and what we apply, but also feeds into our intelligence and data-driven model. Because of the way we operate at the border, we cannot stop every vehicle to look for every illegal commodity. It would be absolutely impossible, so we have to be focused on that process. That is what we do in all of our ports.

Officers at the border will have that range of specific instructions and they will be looking for indicators. They are not necessarily searching for meat, as Helen put it, but they will be looking for indicators that suggest somebody is committing either a non-compliance activity or a crime. Border Force will intercept those vehicles and people and, if we detect any kind of prohibition, restriction, compliance infringement, whatever it is that is laid to us as a responsibility, we will deal with it.

If it is illegal meat, we will hand it to port health colleagues. If they are not available, we will detain and seize it under CEMA. The data that I provided is Border Force's national effort. It is not just port health seizures. It is actually Border Force seizures as well.

**Q33** **Charlie Dewhirst:** It is fair and reasonable to say that Border Force's priority is guns, bombs, people, et cetera, and this does not fall at the top of the list.

**David Smith:** It is a priority and we take it very seriously in the context of the conversations we have across Government about our strategic responsibilities. We deal with whatever we are told is important from a DEFRA perspective. It goes into our model and our model tells the frontline officers what to look for and what to detect.

**Q34** **Charlie Dewhirst:** Lucy, turning to operations in Dover, quite clearly, from what you have said, you are not resourced to the level you would ideally like to be. Could you perhaps give us a flavour of, if you could go to the Treasury tomorrow and ask for extra money and resources, what



that would look like? What scale of resources do you require?

**Lucy Manzano:** We have repeatedly presented funding models to DEFRA, who we were advised were liaising with the Treasury. Those funding models started at £6 million to provide 50% coverage at the Port of Dover and, indeed, Coquelles, where there are currently no controls in place, because DEFRA has not funded that to the council, although it did fund 50 posts incorrectly for the Coquelles checks.

Q35 **Charlie Dewhirst:** Could you just confirm for the Committee that Coquelles would be the Eurotunnel?

**Lucy Manzano:** Yes. It is the entry point for the tunnel. Funding models have been provided. They asked us to provide a range from 50% operational coverage up to 100% operational coverage, which we have done, and we continue to have no substantive response on that, to understand what that looks like. There are significant gaps in the controls that are taking place. DEFRA is not communicating regarding the intelligence or understanding what is actually happening on the ground, which is fairly fundamental in this.

If our funding is not secured, certainly within the next seven weeks, coming to year-end, these checks will stop because the local authority are not in a position to be able to fund them. We do work immensely closely on the ground with Border Force. Fundamentally and put simply, Border Force has the powers to stop. We are taking the action that is immensely complex and it has become more complex because of the presentations we are seeing. If we are not at the port, the seizures are not taking place and the vehicles will be put to one side until we are there to process them. That is the operational reality at the Port of Dover.

Q36 **Charlie Dewhirst:** You are saying, if you do not get the funding in the next seven weeks, you are stopping the checks.

**Lucy Manzano:** In the first two days of February, the Dover Port Health Authority team have already removed almost four tonnes. That is in two days. If we are not there, this stuff is going out on the shelves. This is not stuff where traditionally it would be hard to get hold of. This stuff is appearing in shops, on high streets and in markets. You may well be going out for dinner in normal-looking establishments and be consuming meat that has not been correctly processed.

Q37 **Charlie Dewhirst:** Helen, could I come to you on a wider point about the current collaborative framework between agencies and authorities? How would you improve it, if you had the opportunity to?

**Helen Buckingham:** There are a lot of players in this space with a lot of distinct responsibilities in a very complicated landscape. The biosecurity threats that we have been hearing about do not respect geographical boundaries, legislative boundaries or the respective responsibilities of Government Departments. Therefore, in this context, like no other, interagency working needs to be incredibly united and robust.



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I cannot personally tell you whether there is joint working in the rooms of Whitehall and beyond, because I do not get an invite to that and probably neither does Lucy. David has given a bit of an insight into that today. All I can tell you is how that impacts on what is being done on the frontline. My colleagues would say there is an extreme lack of understanding about enforcement delivery on the frontline. The people who are writing the rules are not asking us to help them write it, to help them shape it, to make it workable.

That is where there has been a real breakdown in communication between national level and what is happening on the ground. They just do not understand what is happening. The Food Standards Agency is far better at communicating with local authorities than DEFRA is. In my 30 years, I have hardly ever known DEFRA to reach out to positively communicate with local authorities inland. In fact, I do not think DEFRA even knows what an inland local authority is. I asked them this at a meeting and they clearly did not know what that is, even though the 300 or so inland local authorities, which we have not spoken about yet, are running around picking all this debris up when it lands inland, either from the illegal personal route or from failed SPS checks. It is the inland colleagues who are picking this up. Their work is not being counted. They have no means of sharing intelligence with each other. That, for me, is a real breakdown in this network. It could be so much better.

**Q38 Chair:** David, Helen said a few minutes ago that Border Force is tasked to stand beside port health authorities. It is not doing that, is it? In any significant presence, you are not doing what you are charged to do, in standing alongside port health authorities. Why is that?

**David Smith:** I disagree. I am afraid I do not agree with that and I do not think Lucy would either. We work in very close collaboration with our colleagues in Dover and around the country to do as much as we can in this space.

**Chair:** To do as much as you can.

**David Smith:** Yes, to do as much as we can in this space, given the model that I have explained to the Committee with the resources that we have available to do what we can do.

**Chair:** Collaboration, where it happens, is fine, but there is not enough of it.

**David Smith:** The collaboration is not the issue. We work collaboratively with port health authorities—

**Chair:** If you are not there, you cannot be standing alongside them. That is essentially my point.

**David Smith:** We are always there. It is port health that are not with us as often as they would want to be. My officers are on duty in places like Dover, Harwich and Felixstowe 24/7. We are always on duty. Should we





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detect products of animal origin that are illegal, we always deal with those products. They are a prohibition. We must deal with them.

As Lucy pointed out, there are times when they are not on duty but we know they are coming on duty. For instance, in Dover, my officers will detain the goods, pending the arrival of port health in the morning to process that seizure. If they are not available over a day, two days or three days, we will process that detection and we will seize the goods under Section 49 of CEMA. We do not ignore detections of illegal meat. I need to be really clear about that.

**Q39 Jayne Kirkham:** I am not an expert. What I am getting is that you are there all the time. You have a lot of other things to do. This is not the top of your list. The port health authority are the specialists, but they are not really there very much, and so all you can do, when they are not there, is detain. It is not your specialism. In the current situation, with the risks that we have, would you want them there more?

**David Smith:** This is fundamentally a very resource-intensive activity. We are talking about huge quantities of meat that need to be detained, processed, bagged and tagged, and then we have to get rid of it in a safe and secure manner. Of course, more resources of any kind, whether that is Border Force resource or my colleagues from port health, would be welcome in dealing with the volumes that we are currently seeing.

**Q40 Helena Dollimore:** Can I just start by saying a big thank you to all of your teams, both at Border Force and at the port, for all the work that you do? Lucy, you have talked about how the conditions at Sevington are not designed for examining meat products. I wondered if you could just talk a bit more about that and the risks that it entails for your staff and colleagues

**Lucy Manzano:** Do you mean the facility within the port, not Sevington?

**Helena Dollimore:** Yes.

**Lucy Manzano:** Sevington is the BCP in Ashford. The conditions are that staff are working on live lanes. That is fundamentally a really significant issue. The staff also do not have any accommodation within the port. They are very kindly located in Border Force's kitchen in terms of resources in between doing the examinations, because this was an interim measure designed to fill a gap during the delay process around the BTOM. That is how we ended up ultimately getting the funding to do these checks, because our lobbying has been very clear with Government that there was a big problem at Dover.

It is worth being clear about this. The problem at Dover is absolutely not replicated at any other point of entry into GB. That is really important to remember. The other presentations of illegal imports will not be to this extent. You will be having stuff seized at airports, in bags, et cetera, which are really neat presentations, in terms of being able to process them.



When we are presented with a vehicle in a live lane, where Border Force colleagues are having to carry out their safety and security checks, they and we do not want to have vehicles then blocking up and impacting on flow. It is debilitating. If, of course, they do find something, then it moves into a completely different environment, where potentially you could have lockdowns, et cetera, and we have a van with meat and all and sundry inside, to the point where you cannot recognise most of it, over the lanes.

That is absolutely not appropriate. We cannot wash down. We cannot contain. Those goods are then bagged up and placed within a freezer for disposal when the company come in and dispose of them. What I mean by that is that the volumes are so vast that we are exceeding the freezer and storage capacity that we have each week. That is just from this 20% operational coverage that we are able to provide. These vehicles routinely take hours to look at. They can take days.

Some of the commercial presentations that we are finding, which are meant to be going to Sevington to potentially have a check there, are immensely complex and require really quite technical skill to work out what is illegal and what is not. We cannot simply just put everything in the bin. These things are owned by people, whether they are being introduced illegally or not. It is not a straightforward process for us and certainly not for Border Force. It is not a matter of just going, "That is all going to go in the bin".

Q41 **Helena Dollimore:** When you are opening a van, say, and you come across a meat product that is looking suspicious or packaged in a suspicious way, presumably there is a risk to the staff opening that vehicle. What kind of process do you go through if you do uncover something that is found to be problematic? What kind of process is gone through to test the item before it is destroyed or to test the staff to see if they have any issues with what they have been exposed to? Does any process around that happen?

**Lucy Manzano:** No. I hope I do not go back to the office and people start saying, "Should there be a process for what we are looking at?" We have carried out risk assessments. The situation and presentation is not appropriate, because we cannot contain it. These are often bloody, leaking—

Q42 **Helena Dollimore:** Do your staff wear PPE?

**Lucy Manzano:** Yes. We provide appropriate safety equipment, and the same for Border Force, but you are often caught out. You do not know what you are going to find until you open it up. The fundamental problem is that the lanes were not designed for this type of work. In all honesty, it is a nightmare for the staff. There are not appropriate areas for washdowns, disinfections, et cetera, so we are having to work on a real case-by-case presentation basis. That just is not acceptable and it is certainly not sustainable as is.



That is why appropriate funding is needed and appropriate planning. A one-year period of funding does not provide for any strategy. How can we do intelligence-led work if the very people who are doing the work are not able to provide that intelligence or feed back in to the meetings with DEFRA that were referenced earlier and vice versa? To be clear, Dover Port Health Authority is providing all the training to staff, to Border Force staff locally, but that is a really unique set-up. What we are doing at Dover is not replicated at the other ports. We do need appropriate provision for the staff.

**Q43 Helena Dollimore:** You referenced earlier in your evidence conversations with DEFRA and engagement with DEFRA. I wanted to get specific about that. I understand that the MP for Dover, Mike Tapp, had convened a meeting with the DEFRA Minister last year to discuss these issues, which you were part of. Are you referring specifically to the foot and mouth issue and the engagement with DEFRA on that, or are you part of ongoing conversations with DEFRA following that meeting?

**Lucy Manzano:** At the meeting you are referring to, we were not given an opportunity to provide an appropriate assessment of what was happening. There was a meeting, the details of which did not cover the reality of what is happening at the frontline. We have consistently and repeatedly requested full engagement, where we outline what the risks are, that they come down and see what is happening in reality, and we get away from these high-level, defensive lines. Let us roll our sleeves up, get down to the nitty gritty and start talking about what is happening.

We continue to find that there has been an absence or an avoidance of accepting that there is a problem. The volumes speak for themselves. We have insufficient funding without a clear indication of what our funding might be next year, if at all, and what is going to happen at Coquelles. As the local authority, we are legally responsible for that. The blurred bits come from the fact that we do not have the stop powers that Border Force has. In the actual ASF order specifically for Coquelles, it says, quite worryingly, that the impact on the public sector, in terms of ASF controls, will depend on the resources that Dover Port Health Authority invests in enforcement.

We are providing a national critical service. If an outbreak were to occur, the impact on the economy, growth and our reputation cannot in any way be understated. That is why we are urging DEFRA to really fully come to the table and understand the scale of the problem, and put in place really effective controls, not just to deal with it in the here and now but actually to put a strategy in place so that we can start prosecuting, because prosecutions have not taken place. The answer to the question earlier is that there have not been any.

**Q44 Helena Dollimore:** I am just conscious of time and I want to cover the organised crime element here as well. Just briefly before I do, Helen, just on that point about the conditions in which vans are being opened, do you think there is a risk of spread from products to humans?



**Helen Buckingham:** This a wholly untapped area. Our trading standards colleagues inland are very good at animal health issues. I am now trying to work with them so that my teaching can communicate more of this animal by-product enforcement—really yucky stuff—to those that are finding it.

Lucy described her work there. These findings go on inland. It was not that long ago that DVLA pulled a vehicle over for a licensing issue, opened the back to have a look, and there it was, chock-full. It even had a till and weighing scales, so masquerading as personal but clearly not, because that was going on to commercial.

Once the meat has been dealt with, often by voluntary seizure, which has no penalty or punishment—there is another conversation around that. We need to get better at using our legal powers, and if DEFRA would help us interpret them, that would be another step forward. I have had enormous difficulty in getting clarity on some of that stuff—in terms of the clean-up, to close the loop, these viruses are so potent that if there is a drop of blood or a discarded sandwich on the Cotswold hills, ASF is here.

When we have taken stuff out of the back of these vans, we need to get better at cleaning up, but practically it is really difficult to clean up a van when you have wooden, slatted boarding. How do you serve an enforcement notice requiring clean-up on a driver who possibly does not speak English, who may just grab the keys and run? That is the last thing you want if there is blood gushing around in the back of this van and it is driving off. We do have to think about this, and this is a vulnerability that we have not taken sufficient account of yet. I am very glad you have flagged it here.

Q45 **Helena Dollimore:** Is there no testing done of the products? Do they just get destroyed?

**Lucy Manzano:** No. They just get destroyed.

Q46 **Helena Dollimore:** Moving on to organised crime, David, I am interested in your perspective on what the reasons are behind this organised crime that we are seeing. Where do you think the markets for these meat products is? Where are they going?

**David Smith:** I cannot comment on whether organised crime is involved in illegal meat importations. That is a question for DEFRA. It owns the intelligence on illegal meat importation, so I cannot comment, I am afraid.

Q47 **Helena Dollimore:** As the man responsible for Border Force in the south-east, you could not tell me if there is any organised crime going on or not.

**David Smith:** I am afraid I cannot, no. I cannot comment.

Q48 **Helena Dollimore:** Is that because you do not know or because it is



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classified?

**David Smith:** It is because it is a matter for DEFRA to answer, I am afraid. I do not have any information that I can share with you.

Q49 **Jayne Kirkham:** You talked earlier about DEFRA sharing intelligence with you, so if it is not that, what sort of intelligence is it that they are sharing?

**David Smith:** DEFRA shares with us appropriate information through the intelligence-sharing gateway. Whatever it understands about illegal meat importation is shared via that gateway. We then have a Home Office intelligence team that takes data from a range of different organisations and they plough that into our frontline service to officers that work in ports. That can be a variety of information. It can be specific intelligence, generic profile intelligence or just indicators, but I cannot answer your question about whether organised crime is behind illegal meat seizures.

Q50 **Helena Dollimore:** Helen, I will bring you in shortly. David, just to press on this point, what do you think the motivation is behind instances that have been reported by Lucy and are extensively detailed in the written submissions? Who do you think is behind these crimes?

**David Smith:** I do not know enough about illegal meat smuggling, because it is not my area of responsibility. We are responsible for detecting it and referring it to other agencies. We are not responsible for the strategy or the intelligence-gathering. It is not part of Home Office's responsibility to gather intelligence on illegal meat importation.

Q51 **Helena Dollimore:** You have no idea where the goods were destined to go.

**David Smith:** No. We do not do any of that end-to-end assessment.

Q52 **Helena Dollimore:** Do you notice any trend in terms of, for example, the vehicles that you are stopping? Do they have similar number plates destination-wise or origin-wise, or are they just a whole range of different number plates with different origins?

**David Smith:** Data from all of the detections and seizures goes on to our database, which is available for analysis. Yes, there are obvious trends that you see in Dover.

Q53 **Helena Dollimore:** Such as?

**David Smith:** The countries that export meat will be the countries that we see vehicles from—those that export meat that have restrictions. Lucy is probably better placed to answer that question specifically, but eastern Europe is one of the source areas for this meat.

Q54 **Helena Dollimore:** You are seeing a high level of vehicles stopped that have illegal meat from eastern Europe.



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**Lucy Manzano:** You have hit on quite a fundamental point: that DEFRA is responsible for the intelligence, yet DEFRA is not communicating with us, who are carrying out the work and have the intelligence.

Q55 **Tim Roca:** Your background, David, is in customs. Originally you started as a customs officer. Customs used to do investigations.

**David Smith:** A long time ago, yes.

Q56 **Tim Roca:** You did do intelligence a long time ago. Do you think that it is a failure that intelligence is held at DEFRA level and is not shared with partners?

**David Smith:** That is not really a question for me. That is a question that would be appropriate for DEFRA. I do not know what level of intelligence it shares with port health. I know what it shares with Border Force, but I do not know what it shares with port health. All I can say is that our relationship with DEFRA is collaborative, and it shares information at both strategic level and tactical level, and our policy colleagues meet with DEFRA on a monthly basis to talk about tactics in dealing with this.

Q57 **Tim Roca:** Is the intelligence not shared with you, Lucy?

**Lucy Manzano:** No.

Q58 **Tim Roca:** It is not shared at all.

**Lucy Manzano:** No.

**Helen Buckingham:** If I could just offer a helpful flag here. The FSA, if it was here, would like me to mention the National Food Crime Unit, which was established to look at exactly this sort of thing—overarching patterns and organised crime in the food space for adulteration criminal matters—and also its local authority and intelligence team. They have a lot of information. I know they are working hard but, as always with these things, they cannot always be shared.

The forthcoming food standards delivery model is starting to get intelligence as being central to more of the conversations in inland work, though there is no focus on imports, be they the legal ones or the illegal ones. That is something that could be taken into account.

Of course we lost our access to TRACES NT when we left the EU. We now have to build our own IT pathway, which Lucy can talk to you at length about. It is called IPAFFS. It has been described to me as the Fisher-Price version of what we used to use in the EU, which needs scrapping and starting again, because it does not do what it should.

We used to have better access to intel before. We do not now, and what we have now is not really good enough. We need to equip local authorities at the border and inland with access to suitable software such as IDB or other communication systems that can share intelligence and build our defence, because that is a gap in what we have at the moment.



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**Q59 Helena Dollimore:** I know that we have the report from the National Food Crime Unit, which has identified some key themes, but it feels very much to me, when reading through those key themes, that people are talking around the issues and using a lot of jargon. I just wonder if you or Lucy could give us some real-life examples of where these illegal meat products are destined for. What market in the UK are they destined for? Is it takeaways? Where is it meant to be going?

**Helen Buckingham:** I can help a little bit with that. The white van smuggler, as we colloquially describe him or her—other-colour vans are available—can be just one van on its way to already known customers who seek a particular Romanian pork, because that is what they are used to and that is what they want. It can be one van going to one place, or it can be, as Lucy is seeing, articulated vehicles with mixtures of stuff that has been notified and stuff that has not, because they do not think they are going to be checked, so they might as well drive on in anyway.

The official weaknesses at the border and the personal import weaknesses are allowing more and more of a gateway. It has been described as a super highway of illegal meat, be it commercial or personal imports.

The customer base can be known. We have had it here in my own area, because I helped the local authorities deal with it, where they just rock up and do door-to-door sales. In a cost of living crisis, when people are careful with their pennies, it can be quite tempting to buy something.

**Q60 Helena Dollimore:** Is that households or restaurants?

**Helen Buckingham:** It can be either. We have known of both of those situations. In a household, the household does not know any better. They do not know that it may be the backyard slaughter of an unknown animal in an unknown country in a room that might not be equipped with no temperature control and no cleanliness. The mind boggles with just how awful that could be. They are tempted because of the cost of living crisis.

In a commercial sense, it is completely illegal for them to buy it, because we have legislation in place that demands full traceability of food that is used in a commercial setting. Any restaurant even remotely thinking about buying backdoor, dodgy meat, is going to be in serious trouble if they are discovered. That is what my inland colleagues are out there looking for.

**Q61 Helena Dollimore:** There is a reference in the summary of the National Food Crime Unit's report to where these products are going. It says, "The servicing of consumer demand for culturally preferred products through the slaughter, unlawful processing or importation of lamb and pork". I just wondered whether Helen or Lucy could comment on that.

**Helen Buckingham:** I have probably said all I can say on that.



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**Lucy Manzano:** I can comment, because I am by profession an environmental health officer. I am also responsible for the environmental food team inland, where this stuff will be landing.

We are in a position now where not only can you buy a lot of these prohibited products online, but you can actually buy them on most high streets. We really have moved away from bringing in food that has cultural value and reminds you of home and everything else, to actually a much more established route of distribution, to not just restaurants but retail shops, where this stuff is sold in plain sight, displaying labelling that clearly shows that it is banned—prohibited—from leaving the country of export that it has come from, because of the risk that it presents.

For example, from Romania, this is the case with raw meat and pork because of African swine fever and the risk that it presents if it comes in. It is not legally even allowed to leave that country. It has left that country. It has travelled across Europe. It has come in through the border because our systems are not sophisticated enough as is, under the new implementation of the BTOM, to detect and remove it. It then ends up on our high streets, and it becomes completely reliant on environmental health officers carrying out inspections, which are routine inspections—unless there is a complaint, they will happen, depending on the risk of that premise, fairly infrequently—to pick up these goods, and that is not a system of control.

As a consumer, you would go into a shop. It looks like any other product, and that is the problem. We really have moved on from this being behind the counter and, “Surely you must know what you are buying”. Actually, the consumer does not know in all cases what they are buying. We have faith, do we not, that there are people like, me, David, and Helen—hundreds of people around the country—carrying out checks at critical points to remove this type of food? Those critical points are at the point of entry, at the point where it might be processed, and then ultimately what the consumer does with it at the end.

We all have an assumption that, when we go out and buy food on our shelves in this country, it has been checked, it is safe and we do not have to worry about that.

Q62 **Henry Tufnell:** I have a follow-on on the data intelligence point. In the beginning, when you were giving evidence, you talked about that six-day gap in respect of foot and mouth. In terms of what you have described about your data sharing, and your collaboration with DEFRA, in respect of Border Force, it is incredibly concerning that there is a six-day gap on top of what you talked about in the systems in respect of the European Union and what we have been trying to achieve since then. Is there any provision to try to work out during that six-day gap what that outbreak looks like in Germany and how it has potentially fed into the UK?

**Lucy Manzano:** That is absolutely a question for DEFRA to answer. The reality is, because of the systems in place, meat and products of animal





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origin are able to now arrive and auto-clear systems, for at least the first six days. We are aware of that auto-clearance process, which is referred to as TODCOF, via the commercial route. When people actually put their paperwork in, the system overrides those checks and enables food to come in, as we speak, without check, but for German products now, we have been told that that auto-clearance function is no longer enable, because the systems are able to be manipulated by DEFRA to control what is and is not looked at or directed to the BCPs.

**Q63 Henry Tufnell:** Would DEFRA be monitoring any of that inland, in terms spread, or probably not?

**Lucy Manzano:** No, because that is another flaw in the system: that when goods do go inland, there is no system of control. Certainly now here, at the short straits, the fundamental problem with the implementation of the BTOM relates to goods that previously could not come through the short straits because there was not a product of animal origin border control post. For rest of world countries, as an example, they would have to go through a port that was contained, so it could not leave until you could prove that it was what it said it was and that it had had the checks that it had had, but since the BTOM has been implemented and controls came in in April, those goods, and indeed any other goods, travel straight through the Dover border without containment, before those checks are completed.

**Q64 Jayne Kirkham:** To move on, we are getting a picture that there is a lot of intentionally illegal meat coming in, in what appears to be ever-increasing quantities through Dover, and that is incredibly concerning.

My part of the questioning is to look at unintentional non-compliance. It seems to me, from what you are saying, that that might be a much smaller part of the problem. My first question is how significant a part of the problem that is, compared to this obvious, really quite large and increasing issue with illegal smuggling of meat.

**Lucy Manzano:** There are two pathways that are intrinsically linked. We have talked about the personal imports via Dover, or classified as personal imports that quite clearly are not. This has just created an unofficial commercial route.

I would say, from the presentations we are seeing, that this is largely not unintentional. If you are at an airport, you could probably say that it is much more likely in that setting that it is unintentional: you thought you could bring back some salami and then you find out that you cannot. That is a far more reasonable conclusion.

Certainly what we are seeing, in terms of personal import presentations, we are on the wrong pathway if we think it is a matter of education at that point. We are in an area where this is about making money. There is a clear market, a market that we cannot compete with financially, and a



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market that many of us are completely unaware of when we are purchasing our food.

Of even greater concern is this commercial import route. We are now seeing illegal meat from banned and restricted countries actually able to come in via the official route. They are actually putting in paperwork, and those goods, as an example, are able to come through without detection because the systems in place, which were introduced when the BTOM was implemented, were not ready, were not sufficient and were not able to identify goods, for example, that have come from a country that might just have one area that is restricted because of an outbreak.

What we are finding, or what is clearly evident, is that, despite reassurances that systems were ready and efficient, they are not, and they are aiding meat that is illegal, that is not suitable, to come in through the commercial route, but they are also enabling meat that is from the higher-risk areas to arrive and go through the border without any checks. Even if they are presented correctly and the purpose of the checks is just to make sure that they are what they say they are and they are not going to be harmful, those checks, those legal presentations, are also not always taking place. That is a big problem. That is a big flaw in the system.

**Q65 Jayne Kirkham:** In your opinion, it sounds like, from either the personal or commercial route, the unintentional non-compliance is very small; mainly it is intentional. Would you agree, Helen?

**Helen Buckingham:** Yes, I would. There is not a lot I can add to that, other than to say that we have a new border TOM policy that has changed the percentages of checks that are carried out on commercial goods when they are properly pre-notified: the system should look for this many per cent of this type and this many per cent of that type. Those percentages have been largely reduced for the rest of the world anyway.

Lucy has already mentioned the TODCOF override facility, which has largely been the default position. Even though we have carefully constructed percentages that have been risk-rated and applied to certain commodities—and the FSA has been a part of this conversation, I am glad to say, and needs to have a louder voice in this space for exactly these reasons—the percentages have been applied but TODCOF comes along and wipes it off so everything skates through anyway. Then your legitimate importers will think, “I am notifying, but heck, what is the point? I am just getting through anyway”, and then you might start to introduce temptation: “If I am getting all my good stuff through without being checked, what is to stop me putting in a bit of dodgy stuff at the back? That is even better. That is even more lucrative”.

I am speculating. I do not know if anyone is counting this, but it is an unintentional non-compliant situation that could be exacerbated into something much worse.



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Q66 **Sarah Bool:** I want to return to the personal imports policy, because I appreciate there is a variety in the different countries, even with the EU, in terms of what they can and cannot bring in, and the NFU is worried about those personal imports. Should there actually be a total outright ban? How would you like an import policy to work in practice in a better way?

**Lucy Manzano:** It would be helpful to have a personal import policy. That still has not been provided for the EU. That is an issue. There are knee-jerk safeguard measures that are released.

The systems are very complex, and that is half of the problem: that it is confusing, and then it is quite easy to get lost in the detail and lose the basic point about what this is all about, which is keeping this bad stuff out in whatever presentation there is.

There is a space for a harder line on this until we get on top of it, systems are reviewed and a genuine reset is taken, because it is clear that what is happening is not working. If it was, we would not be here. We would not see the volumes we are seeing. They are unprecedented, and we have to do something different to get on top of this before we end up in a position of an outbreak, with the devastating consequences that we have seen time and time again.

The fundamental point is that we need to learn from the past and previous reviews. Let us get it right now. The same patterns occur. There are the same behaviours. It is about people communicating directly and clearly, sharing information in a transparent way, and making sure that funds are in the right locations so that we can deliver these controls. I agree: more could be done definitely in terms of restricting the personal imports route.

**Helen Buckingham:** The national pig industry has called for this. We still have these 2kg allowances for POAO from EU. The one that came in yesterday does not have that. Maybe there is a tightening up because, frankly, a sandwich is all it takes. Why do we need to have a 2kg import? That could do with thinking about.

I totally support the idea that the whole thing needs to be thought about all over again. We could change the rules for the port health authorities and local authorities at the BCPs, who are already doing this work for legitimate notified meat; they are already there; they know meat. Our competencies as EHOs are of the same level as the vets. It took me seven years to get my full food ticket. We can do this stuff. Let us change the responsibility. Let us change the law and have it properly planned and researched. Let us share intelligence with each other from the border, the first line of defence, along with what is happening inland, the second line of defence, and really improve this whole intel capture and crack down on it.



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We need the support of the central Government Departments to be clear and supportive of us if we try to do that, because right now it really is not working.

**Chair:** Let us move on, then, to the second line of defence. Josh, you have some questions on the local authorities.

**Q67 Josh Newbury:** Before I dive into the questions, I just want to say that, personally, I am really shocked about some of the things you have told us today, in terms of the lack of engagement from DEFRA, particularly during a live biosecurity threat, which we know from past experience could hit our economy, particularly our farming sectors, to the tune of billions, and also in terms of the conditions at the port, which make it really difficult to carry out checks and seizures. Thank you for everything you are doing, even under those circumstances.

As a local councillor, this one is really close to my heart. Helen, it is clear from your evidence so far that many inland local authorities are all too aware of the risk of non-compliant imports, but do you think that is the case across the country, or do you think we have some local authorities that are very alive to the risk and others less aware?

**Helen Buckingham:** There is a real mix. As a nation, we are understanding and hearing more about these stories all the time, and EHOs such as myself and Lucy are always at work, 24/7. We tune into news headlines.

We know about issues with some inland local authorities. I am talking about 309 in England, 22 in Wales, 32 in Scotland. We work across boundaries to do what we can. We are alert to these things happening all the time. Some inland local authorities are very active and go looking for this stuff and really know how to deal with it. Others in more rural areas, quieter areas, perhaps do not feel the need to look, but they all know they have responsibilities in law. This is what I teach them and what the FSA teaches them.

The responsibilities are there, but, as I said at the beginning, this is really complex stuff. It is not food safety legislation. This is imported food verification legislation. There are overlaps but it is tricky, and they do their best, but we need more support from the FSA. It has some very good people. There are just not enough of them. We need quicker responses. We need more training products. We need to be able to share intelligence better. There is a lot more we can do.

There is a shortage of EHPs, environmental health officers, or chartered ones, environmental health practitioners. There is a massive shortage out there, and that has been documented for many years. We need to think about the machinery of getting more experience into this landscape and to keep them there, because this is what we will need.

**Q68 Josh Newbury:** In terms of the mechanisms that the inland local authorities are using to identify and remove these products, what are



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they, and do you think those are adequate? You have mentioned the inadequacy of the post-Brexit IT system, for example.

**Helen Buckingham:** The Food Standards Agency puts out early warning system notifications on products and goods to look at, but obviously they are not necessarily the products of animal origin, the meat-related ones, because food risks exist in high-risk food not of animal origin as well. That is a whole other conversation that we have not touched on today, because obviously that is nothing to do with meat.

The FSA will help and support local authorities where it can, but there could be more messaging in this space, but, of course, it must not step on DEFRA territory. DEFRA is responsible for POAO imports, and it is DEFRA that has to be more communicative with local authorities.

There has to be a way in which that can happen, because right now DEFRA is very selective with the BCPs it talks to and those it does not, and it does not acknowledge or recognise inland local authorities at all. No account was taken of inland role in border TOM development. Inland local authorities do not have access to IPAFFS. We do not have an intelligence system. We do our best, and there could be so much more we could do.

Q69 **Josh Newbury:** That is concerning in itself. Did you want to add anything, Lucy?

**Lucy Manzano:** If I could just add in terms of the practicalities and the volumes, we are talking about huge volumes, hundreds of tonnes going inland, responsible for an inland environmental health team, and you are presented with a lorry full of illegal meat without the kit even to get on it.

This is an entirely different world to going in and inspecting a food premise. How do you control that? How do you store it? How do you move it? Do you have the delegations? They do not have portal vets. It is not an effective system of control.

Q70 **Josh Newbury:** Just on that, particularly in terms of resource, do you think that local authorities have the appropriate resource to carry out this work? We have seen reports from the FSA and also the Local Government Association, which have identified that the vast majority of councils are struggling to recruit food safety officers, environmental protection officers, and the vast majority have vacancies that are either remaining empty or they are having to fill with expensive agency staff. What impact do you think that is having?

**Lucy Manzano:** It is huge. Recruitment is an absolute nightmare for us as a local authority, not least as a port health authority. That is why we are so dependent on the work of the vets on the ground and their technical knowledge. If we have the resources as the starting point, we will have to repeatedly advertise posts. These environmental health officers are like hen's teeth, especially within this field. There has to be a long-term strategy.



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We are now in a position, because of years of austerity and other things leading to scaling back, where we cannot just scale back up. This is really technical stuff. There need to be long-term plans in place. The reality is at the moment, if you said to me, "That is brilliant. You can go out and recruit 20 people", that would be really tough.

**Helen Buckingham:** If I could just add a statistic in the pot there, the best one I could find was the FSA's capacity and capability report of 2023, which refers back to 2021, when 56% of local authority food teams had vacancies. That equates to some 375 FTE posts unfilled, and I suspect that picture has not changed all that much since then.

Q71 **Josh Newbury:** Lastly, Helen, you mentioned that inland local authorities are having to clear up the goods that escape through the gaps in the system. Do you think that it is DEFRA that should be grasping the nettle when it comes to challenges like making sure data is shared and that staff are appropriately trained?

**Helen Buckingham:** It is a conversation for both Government Departments to have, because they both have overlapping responsibilities in this place. Some of it is clear, some of it is very blurred, and actually, even though those of us who work on the inside cannot always be absolutely clear who should take over, the FSA probably does more of the communicating and we are more used to that and they are better at it, but there is no real reason why DEFRA cannot get better. Sometimes the FSA is not in a position where they can answer, because if it is a clear policy of DEFRA, then the FSA are not going to give us an answer.

Try to find a letter from DEFRA that has ever come out with a named person or even a department on it. I saw one last week that had no name, no date, no department, which was classic DEFRA. There is nowhere to go. There is no email address. There is no response. DEFRA is much quicker and happier to respond to trade questions than they are to BCP questions or local authority questions in a meeting. I know my colleagues rely on snippets in chat on the teams for their advice rather than actual advice or actual guidance.

My colleagues are not idiots. They do not need spoon feeding. We just need to know what Government's expectations are of us. Give us some tools and we will get on with it. We train for a very long time to be able to do this work and we are more than capable of doing it, and happy to do it. We are not shy of it. We do much of it in our own time. We all do, because we care so much. You do not go into this job for the money. You go in because you care, and here we are, with the biggest threat to food safety we have had for a long time. We have to get to grips with it.

Q72 **Josh Newbury:** Yes, absolutely. We just need a bit of co-ordination from the centre to enable everybody to do their job effectively.

Lastly, Helen, you predicted about 18 months ago that there could be additional burdens on local authorities as a result of BTOM being brought



in, particularly where you have biosecurity as a risk. You have road consignments that need to be chased down, for example when a vehicle has not attended a border control post when called in for checks. Has that risk that you warned about been borne out?

**Helen Buckingham:** No, not at all. If you did a fine search of the 180-odd pages in border TOM and look for the word "inland", you will see it replicated only with regards to Sevington, the one and only inland BCP, where all the official goods coming in through Dover have to go for their checks. It does not take account of inland local authorities at all. There has been no extra burdens money going to inland local authorities, and we really are picking up the rubbish and doing our very best with it.

Q73 **Josh Newbury:** Do you think that, in reality, inland local authorities are bearing the brunt, but, as you said, they are not getting the recognition or the resources?

**Helen Buckingham:** Yes, absolutely. There has not even been any temporary additional funding to Bev and the team, and Lucy at Dover, even though we have had FMD and ASF control switched on and the illegal smuggled goods are coming through more and more in Dover, as we have heard today. There has been no extra sprinkling of cash there. They are doing all the work. My inland local authorities are running around trying to do their best, but they have had absolutely no extra money either, and no one is counting. It is literally that metaphor: we are at the tip of the iceberg. Let us add another metaphor: let us do a deep dive around this iceberg and just see how bad this problem is. That is a big gap here. We do not actually know.

**Lucy Manzano:** There is no system in place to know the scale of this problem. What Helen is referring to and what I refer to is that dreaded call that you might get: that officers are out on the district and they have found something that they think might not be legal. There is nothing in place that is actually telling us the scale of this. What Helen is referring to is when it is actually found, but there are no robust systems in place that are tracking this and making sure that it is removed from our food chain.

Q74 **Sarah Bool:** As you said, it seems that there are many problems and many communication breakdowns at this point, but one question for me is how successfully you think that the border target operating model, BTOM, balances trade facilitation and biosecurity.

**Helen Buckingham:** Lucy, you go first, because you are closer to this than me.

**Lucy Manzano:** The fundamental issue is actually the implementation of the BTOM. Clearly, extensive work went into it. The fundamental principle of it is that it is able to identify the bad stuff based on evidence, based on risk, and make sure that proportionate controls are in place to remove it. Like anything in life, you have to understand the problem if you are going to control it, and because the data volumes at the short straits were not accepted, because decisions were made about infrastructure that were



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not based on biosecurity, systems were not ready. There is no control from the point of Dover to the BCP unreplicated anywhere else.

That system was brought in. There is a function referred to as TODCOF—it is easier just to refer to it as auto clearing—whereby, intentionally or unintentionally, your food that you enter and say, “I am bringing this stuff in”, is able to actually bypass controls completely. It does not receive a documentary check, a person looking at it, which is the entire point, working out, “Is this something we need to look at?”

That documentation will be automatically processed via the system. You will be charged for that. The biosecurity value is, of course, one of great question. We know there is huge inconsistency taking place around the country. We know the west coast is open. You cannot have a border control post that is not part of a controlled system. The system starts at the port of entry. It cannot be disconnected from the facility where you are supposed to be controlling it, and that is fundamentally not working.

In terms of the auto clearance system, we have evidenced—we have provided evidence within the pack, but also directly to DEFRA and the Food Standards Agency—that the systems in place are resulting in tonnes of illegal meat coming through the commercial channel. That is the exact channel where all of us as consumers were reassured this would not happen once the BTOM was implemented, and it is happening. It is happening because the systems are enabling it to happen. It is ineffective and, for the short straits specifically, it is happening because goods drive straight through the port and there is nothing making them go to that border control post, despite statements such as, “There are robust controls in place”. It is not only robust controls not in place at that point but then away from it. How many goods have been instructed to go to the BCP? How many of those goods have arrived? How many of those goods have driven straight past?

Of the huge volumes coming in within scope that have been risk assessed by the BTOM, how many of those are simply being auto-cleared? It undermines the entire process that we are enforcing, the rhetoric that we have, in terms of risk-based controls that are keeping us safe and maintaining biosecurity. That in itself is a contradiction and that has to stop, and the only way for that to stop is the system of containment that has always worked very effectively. That is certainly not a system of checking everything, as Dave has referred to, but we have to understand what is coming in. You cannot have the port health authority blind to live movements of what is coming in and then completely disconnected to the facility where those goods would be looked at if they arrive and do not simply drive past.

Of course, all of this is based on the back of the fact that the BCP at Sevington was designed not for the volumes coming through the short straits—that was where the Bastion facility had the scope—but for the channel tunnel trade, which, within scope, equated to about 18%. There





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has been no upscale in that building. The car park is exceptional but the inspections do not take place in the car park.

Again, we have some really clear issues in terms of, if they attend, goods being able to be appropriately examined in a way that would not aid further cross-contamination. We know that has been a big problem in the current position with foot and mouth and the outbreak controls.

Of course, at that location, without any control at the point of entry and exit, if those goods are allowed to be re-exported, they are being re-exported back into GB. Ashford is not the border; the border is of course at Dover. Something has to change.

**Chair:** This has been a quite remarkable evidence session. I thank you all for your participation and indeed, as others have said, for the work that you do. We have certainly been given—forgive the term—food for thought. I am pretty certain that the Committee will return to this with Ministers as a matter of urgency, given what was said about the funding at Dover.

Thank you for everything that you have done in bringing this to our attention today. We are grateful to you for your attendance and your time. Helen, we hope you are restored to full health soon and we are grateful to you for joining us in the way that you have done. For the meantime, this concludes the proceedings for today.