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Rt Hon Mr Alistair Carmichael MP
Environment, Food and Rural Affairs Committee
House of Commons
London
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Dear Chair,

Ref: FMD and Biosecurity Concerns at the Short Straits

I am mindful and encouraged by the ongoing work of the EFRA Committee's Animal and Plant Health Inquiry, which I fully support.

I write with reference to Defra's most recent press statement (7 March) on the import ban of products susceptible to Foot and Mouth Disease (FMD) from Hungary and Slovakia, to express my serious concerns regarding GB biosecurity, and specifically, how controls are being implemented at the Short Straits in comparison to all other points of entry into GB to prevent the introduction of notifiable diseases, protect GB farming, and safeguard GB livestock from animal diseases such as FMD.

As a consequence of the bespoke implementation of the Border Target Operating Model (BTOM), and its exclusive application at the Short Straits, which is unreplicated at any other point of entry in the country, GB's biosecurity is being put at significant risk. The worrying FMD outbreaks in Germany and Hungary and the ban on imports from these countries, including Slovakia, is highlighting the system's failings which are significantly flawed.

Currently, the Short Straits serves as an open door for non-compliant imports, which is significantly impacting other Border Control Posts (BCPs) that are doing everything they can to protect the country.

Unlike other points of entry into GB, where border control measures are in place and make it difficult for goods to leave the border without control, at the Short Straits:

- Potentially affected FMD products cannot, and are not, being stopped and held at the border.
- These consignments are able to enter the country, uncontrolled and are free to travel through the border, with the aspiration of attending and arriving at a Border Control Post (BCP) located 22 miles away from the border without any control or oversight to ensure they arrive or are located and controlled if they do not.
- Trailers are being unloaded before reaching the Sevington facility, which is not permitted anywhere else in the country - except at the only government-operated BCP in the UK. When these consignments reach their final destination in GB, the risk increases significantly compared to when goods are identified and stopped at the border. Foot and Mouth Disease (FMD) is highly contagious, and there is a serious risk that workers at inland facilities could inadvertently transfer the virus to livestock. For this reason, controls must be completed at the border, and these products should be stopped immediately upon arrival—not 15 days after importation.
- Rejected FMD consignments permitted for re-export leave the BCP at Sevington uncontrolled. There are no systems in place to ensure they reach the point of exit,

which allow rejected goods to move inland, creating opportunities for them to be offloaded and potentially contaminate GB livestock with exotic notifiable diseases.

- Consignments are not pre-notified as required by GB legislation, and no system has been implemented to prevent this non-compliance.
- Provided consignments have not auto-cleared, statements of reassurance from Defra that holds take place at the Short Straits are not deliverable; you have to be at the border to hold goods and stop them from moving forwards and clearing, not located inland, disconnected from the border, without control.

A serious and significant gap in biosecurity has been created, with potentially contaminated/infected products, and vehicles, able to spread the virus as they travel inland, away from the border, before detection.

DEFRA's recent [statement](#)⁽¹⁾ (7 March) contains several inaccuracies regarding the position at the Short Straits where indeed the majority of these animal products are entering due to its convenient location to Europe.

*"Action is already underway with local authorities and traders to address possible risks from goods on the way to GB. Such goods must be pre-notified and **wider border systems in place will prevent consignments entering GB.**"*

At the Short Straits, no system is in place, and no action has been taken by the enforcement authorities to ensure that consignments are correctly pre-notified.

There is currently no effective system of control in place to prevent consignments from entering GB via the Short Straits. The existing system they are referring to **does not prevent consignments entering GB.** There are no wider border systems which physically contain these consignments within the curtilage of the port, or within this Port Health Authority upon arrival to prevent them from entering GB, because of how Defra are implementing the BTOM at the Short Straits.

Unlike any other point of entry in the country with a BCP, these consignments can travel freely without physical intervention across this border and into GB. **I have been informed by colleagues working at the BCP that they have no control over consignments that do not voluntarily present themselves at the BCP.** How does this free movement '*protect farmers and their livestock*'? If the virus is present, this uncontrolled journey and inland "control" presents greater opportunity for disease to be spread to GB livestock during either the 22-mile journey to the BCP (if they present for inspection) or to the final destination (if they do not present) before any containment measures can be implemented. It is therefore not accurate to proclaim that "**wider border systems in place will prevent consignments entering GB.**".

To mitigate this significant risk of disease transmission, actual controls must be enforced at the entry point (as is the case at all other BCPs) rather than relying on potential post-entry intervention. This does not align with the reassurance to the public that "*The government will do whatever it takes to protect our nation's farmers from the risk posed by foot and mouth disease*".

Without effective, stringent controls at the point of entry to the Short Straits, our nation's farmers are not being protected in the way it has been implied. Goods continue to enter freely and move throughout GB, unlike at other BCPs, where consignments can be held at the port until they are properly checked by competent staff. Indeed, these are the controls that were designed to and should be taking place at Dover (Bastion Point) but are not, which is leaving a major biosecurity gap at the Short Straits. Therefore, statements such as-

"That is why restrictions have immediately been brought in on animal products from Hungary and Slovakia to prevent an outbreak. We will not hesitate to add additional

countries to the list if the disease spreads. We will continue to keep the situation under review working closely with the Hungarian and Slovakian authorities.”

Present only half the picture. The reality is that these restrictions exist only on paper and are not being effectively enforced at the border for the Short Straits, or indeed on the West Coast where the CVO recently confirmed there is ‘unfettered access to GB’. Without actual border enforcement at key entry points like Bastion, high-risk consignments presenting a risk to GB biosecurity are able to enter GB unchecked, undermining the restrictions introduced.

With this in mind, to prevent FMD and other notifiable diseases such as African Swine Fever in GB, immediate action is needed to close the Short Straits biosecurity gap. If a notifiable disease is introduced, the consequences would be catastrophic for the economy, exports, and our farmers.

I urge the EFRA Committee to investigate this critical issue to ensure that effective border controls that deliver on biosecurity commitments are instigated at Dover and that Bastion Point is stood up.

In a recent [article](#)⁽²⁾ by Politico, Defra denies claims that German products were bypassing the border. They have said, “*These goods are not permitted to enter the country, any consignment carrying them will not progress through our clearance system and will be stopped at the border*”. To be clear, these goods are arriving via the Short Straits and are not being stopped **at the border**. They are dependent on finding their way to, and presenting at, the BCP at Sevington, and for those consignments that don’t arrive, they travel inland, and it can take days for them to be detected, traced, and dealt with appropriately.

I can also verify that meat products with specific commodities from Germany have been able to auto-clear despite Defra applying changes to IPAFFS to stop FMD susceptible goods from Germany from auto-clearing on the system.

Please do not hesitate to contact me if you require further information and I welcome the opportunity to answer any questions you may have or provide clarification on any of the points enclosed.

Yours sincerely,

Radoslav Stankov
Portal Official Veterinarian
Technical Lead

(1) [Import ban of cattle, pigs, sheep and deer from Hungary and Slovakia to protect farmers after foot and mouth case - GOV.UK](#)

(2) [UK bans meat, dairy imports from Hungary, Slovakia after foot-and-mouth case – POLITICO](#)