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Rt Hon Mr Alistair Carmichael
EFRA Chair,
Palace of Westminster,
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Dear Chair,

Ref: A Letter of Thanks

I wanted to write to you, your members and wider team to thank each of you personally for the effort that was made and the authentic nature of your visit to us here at Dover (18th March 2025). I commend the Committee for their united and constructive approach. It provided a breath of fresh air, leaving recognition and hope that the biosecurity threat, and insufficient resourcing reality we face at Dover and Coquelles is real, and will be scrutinised, and not ignored by this Committee.

Indeed, you are the first MPs to visit our illegal meat work at the border, and to have gained access to Bastion in its completed state. Which has been kept firmly under wraps, with its need or use continuously and most vehemently dismissed and denied without open scrutiny, as highlighted during our brief tour of parts of the facility.

Defra appear to have lost sight of Bastion's biosecurity value and purpose, disregarding the increasing need (since BTOM implementation) for a bio-secure facility within the area of the Port Health Authority (PHA) to enable it to effectively control the very border the authority is required to safeguard.

This is brought into focus, by the undeniable questions around the effectiveness, cost, value for money and critically what biosecurity attainment is being achieved through the BTOMs delivery at the Short Straits and indeed nationally. I believe it is no coincidence (and indeed more likely a consequence) that since the BTOM's implementation we have seen the sharpest increase in illegal food/meat arrivals at this border, which worryingly is now referred to as the 'illegal meat highway'. So what protection is the BTOM really delivering? Simply stating that it is, when things are clearly not right, is not acceptable and will not prevent the incursion of disease.

Bastion's functionality would ease Sevington's operational dependency on system manipulations such as auto-clearance, variants in holds, and setting many inspection frequencies to zero (in effect prioritising flow over biosecurity).

These manipulations (the details of which are guarded and generally not disclosed) provide the lifeline to Sevington that enables the site to outwardly look relatively quiet and to appear to be operating well within its building capacity (presenting a "no queues, no problem" visual). It also enables the port health activity to function. Our view remains, that as Defra's volumetrics and infrastructure decision was wrong, they are now unable to operate the port health functionality at Sevington without these manipulations in place (auto-clearance etc.). Bastion and DPHA should be brought online to deliver controls, which would unquestionably improve biosecurity and resilience, whilst enhancing flow and process speeds for trade and ensuring that the checks required, actually take place.

However, even with these operational weaknesses, and within this changing disease landscape with the threats posed by ASF, FMD and PPR at their highest, remarkably Defra refuse to engage in any discussions or suggestion that the BTOM and its controls may not be working as they should be. They refuse to acknowledge or consider any simple solutions to improve the position, such as allowing the van area within Bastion to be utilised, even if only as a temporary fix, to help alleviate the undeniable illegal meat pressures we are battling.

In practice Defra appear locked-in, and inflexible in their thinking and mindset towards this border, and concerningly without obvious appetite for inquiry or change. In truth, it is this set and defensive approach

that is one of the most significant and unnecessary barriers we face, with the primary casualty most likely being biosecurity at this border and its consequential impact on GB.

Your Committee's active engagement, curiosity, questions, and appetite to understand what is happening was therefore refreshing and valued hugely by all.

Whilst our presence and input at Bastion felt at best, unwelcomed by the large Defra team, and despite not seeing the full scale of the facility, or answers from Defra to questions around costs, volumes, future use etc., I hope the Committee still found the visit helpful to see the unrestrictive internal space and capacity at Bastion. Which was specifically designed to be able to dynamically respond to risk (such as FMD/ASF) and the unprecedented scale of groupage loads that routinely arrive via Dover, compared to that of the design limited like for like building at Sevington.

This hopefully helped highlight how the Sevington buildings internal limitations impact on trade (increased cross contamination risk, damaged goods, delays, increased costs etc.), simply because they do not have the required internal space (especially in the off-load areas and freezers) to complete all checks required appropriately (off-load and split fully). Yet despite this, trade is charged via the Common User Charge (CUC) and additional Port Health Charges, for checks to take place in this inconsistent manner, when Bastion is complete and lays, despite its need, empty.

This is clearly demonstrated by the FMD outbreak and Sevington's bespoke response to it. Indeed, the Chief Veterinary Officer (CVO) reported they were working with Sevington *'to split German and non-German elements within a load, as unlike other PHA's they are unwilling to do this and require all mixed loads to be returned or destroyed'*. Indeed, one agent approached DPHA for help regarding a high value mixed load that had been at Sevington (with driver) for 15 days because they could not off load and split their load reportedly due to the space restraints within the BCP.

Whilst the visit to Sevington may have included the customary controlled lines, I hope that it also provided clear and accurate answers to the questions the Committee asked. Not least around how things are controlled (the reality not the concept) from the border to ensure their arrival at the BCP and back again to the border if re-exported) and the simple numbers around what **is** coming through the Short Straits each day, what **is** being checked, and what **isn't** i.e. the total number that auto-clear each day, the total number requested to attend each day and the number that do and do not, and exactly what has happened to them. Without a doubt, this information should be readily available. These are simple numbers and arguably in everyone's interest to provide and understand. Transparency is vital in these circumstances.

Finally, we are mindful that it is unlikely from our experiences to date, that the presentation provided at Sevington would align with the significant concerns of DPHA and indeed those shared by trade around how bio-secure, consistent, and cost effective the current arrangements are at this border. With responses from the newly formed operation (led by project officers) potentially creating confusion or diversion from what happens here, I can confirm that members of the Dover team have been working at this border for over 30 years and as such hold substantial knowledge and information to support our concerns and the operational reality over that of the stated theory (such as the rhetoric *'only legal goods go to Sevington'*). As such, members are more than welcome to contact the team with any questions or clarification they may seek and or indeed come down again to visit a shift or run through the process at our busiest times.

Our duty is to safeguard this border and to speak up when the border is in anyway compromised. Indeed, the CVO said in her comments to the Committee (4th March 2025) *'Port Health are our eyes, ears and checkers. They are the **competent authority at the border.**'* As such I conclude that the systems in place are not operating as they should and that we have raised countless requests for prompt action and workable solutions, but these are simply rebuffed. With FMD/ASF creeping, change is urgently needed to close the gaps before it is too late.

Once again from all the team at Dover, thank you for listening and seeking scrutiny, answers and solutions.

Yours sincerely,



Lucy Manzano
Head of Port Health & Public Protection