



Sent by Email

Rt Hon Mr Alistair Carmichael MP
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Contact: Lucy Manzano
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Dear Chair,

I write to provide an update on the operational position at Dover Port Health Authority (DPHA), and on the funding provision proposed by Defra to DPHA to protect the UK from the introduction of diseases such as Foot and Mouth Disease (FMD) and African Swine Fever (ASF) at this unparalleled point of entry.

DPHA welcome the inquiry, its scrutiny and the work of the EFRA Select Committee and its team.

Having read the Ministers responses and watched the oral evidence sessions, it is concerning that Defra remain unable or unwilling to be transparent and provide answers in full and simple terms. Especially to pivotal questions raised by the Committee, around what is coming in, what is and isn't being checked, and why. Instead, answers are not clear and muddled with additional narrative, which appear constructed to make events on the ground, seem different or much better than they are.

As outlined in my letter to you dated [21st March 2025](#), our experience and the impact of working with Defra to date, is that they 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'*.

In truth, the current position, and Defra's stance towards it (seemingly unduly defensive and deflective, over reflective and responsive), and the responses you have received (which include inaccuracies that do not align with the operational reality), are largely unchanged from those presented to the last Committee.

Indeed, my letters [dated 18th March 2024](#) and [9th May 2024](#) to the previous Committee, help highlight how little has changed in Defra's response and approach to enquiry, accuracy in reporting, transparency, review, and requests for prompt action.

Even with the threat of FMD and ASF in Europe looming, and clear and repeated evidence of border failures allowing significant volumes of prohibited products into the UK, our requests for urgent action and additional funding, remain unanswered. The last letter received from the Minister was dated 11th March 2025.

Defra appear operationally static and undynamic in their thinking and responses to the live and evolving threats we are experiencing at the Dover border. No to slow responses that routinely lack detail, accuracy, evidence and in parts logic. All of which, impact on the delivery of our border controls and DPHA's ability to deliver its statutory functions and safeguard this border.

With that in mind, and a year on from the implementation of the Border Target Operating Model (BTOM), I thought it helpful, based on live operational experience and evidence, to set out how we have reached the position where banned and illegal food/products of animal origin (POAO) can routinely be found on our highstreets.

How has this happened? - Defra determined, against substantial port health advice regarding achieving biosecurity, and public health attainment, to implement the BTOM at the Short Straits (SS), without designating the completed Border Control Post (BCP) at Dover. Which is located within the Dover Port Health Authority and its established and effective systems of control and oversight at the border.

It is important to remind ourselves at this point, that a BCP is the place where goods should be examined to check that they are what they say they are, are legally compliant, and **safe to come through the border and enter our UK markets**. Dover's border is of course located within Dover Port Health Authority and not in Ashford, 22 miles away, where Defra's determined BCP (Sevington) now operates.

Critically, post-BTOM implementation, it (Sevington BCP) operates without any dual port health connection or oversight at or between the border and the BCP facility, where Dover's imported food/POAO controls are meant to be completed (if they arrive).

Instead of opening Dover's BCP, Defra opted to-

1. **Ignore established data volumes** for the Short Straits and base their modelling, assumptions, and decisions on a >1.1 million miscalculation of goods that would arrive and require an SPS check.
2. **Invest and implement in a system (intended to be covert) called TODCOF** (Timed Out Contingency Feature) which automatically clears medium-risk goods despite them requiring a check, if their entry has not been actioned 2 hours before the estimated time of arrival into the country. This results in food/POAO routinely clearing before they even arrive in the UK. Auto-clearance of this nature is not replicated in the EU's equivalent system 'TRACES'.
3. **Change legislation so checks no longer had to take place at this border** - to enable commercially imported food and POAO that arrives from around the world and requires a check (because of the risk it may pose to the UK markets) to cross the border at Dover and enter the UK unfettered, without physical intervention or control unless it freely attends Sevington.
4. **Set inspection frequencies to zero** for food/POAO that would require a physical check at a BCP. This ensured a 'no queue, no problem' visual. Making the BCP outwardly appear to be working effectively, and well within capacity. Thus, supporting Defra's narrative that Dover's BCP was not required.
5. **Not introduce or implement any live systems of control at the border**, or between the border and Sevington (in Ashford) (the new site for border examinations). Meaning SPS goods requiring a check, arrive and leave the point of entry/exit and indeed the Port Health Authority's (DPHA) area of jurisdiction, without sight, physical control, check or restriction at the border and indeed, travel away from it.

6. **Leave the two intrinsically linked locations (border and place of examination) to work and operate completely independently**, without dual systems or connected oversight, jurisdiction, or funding streams capability at the border.
7. **Eliminate funding streams** that enable DPHA to self-finance to the level now required to deliver the function and control the mounting illegal food and POAO entries taking advantage of the failing systems and gaps in the border created by Defra. Who moved all chargeable work to Ashford (commercial checks) and left non-chargeable work (spot checks) to be completed by Dover.
8. **Pro-actively overstate the actions, and capacity of Border Force** to complete food and illegal POAO controls at Dover and Coquelles, and to underplay the work and statutory responsibilities of DPHA to safeguard the border from food and illegal POAO presentations.
9. **Not share data and information held on IPAFFS (Import of Products, Animals, Food and Feed System)** - Defra's IT system that controls all imports of SPS goods requiring checks. This system contains the import data on the volumes of SPS goods coming in that require checks, the number and type of checks undertaken, the number that are auto-cleared, the number that do not attend, the number that are rejected etc.
10. **Not provide the income figure, generated via Defra's Common User Charge (CUC)** to operate the Sevington site (this is separate from Ashford's Port Health charges which, for the first 11 months of operation, **has surpassed £9 million**). Without this information, transparent assessment cannot be made to determine and compare biosecurity attainment against the cost to business.

What is the operational impact of these decisions and the way they have been implemented? - The border at Dover has been left vulnerable and without effective bio-secure controls operating on the ground for both commercial and personal import presentations.

Wide-ranging evidence (unacknowledged by Defra) has demonstrated that the live operational arrangements are arguably unsound and undermine UK biosecurity, public, and animal health, not least because they are not implemented consistently across the UK. This brings into serious question what value for money and biosecurity protection the BTOM's current implementation arrangements are affording us.

How are banned and illegal food/POAO reaching our shelves? – Vehicles simply drive straight through this border because the new imported food systems and infrastructure arrangements put in place by Defra, are not effective. Complemented by woefully insufficient funding to DPHA with which to complete pro-active illegal meat checks. In operational reality, this leaves Dover Port unfettered 80% of the time and Coquelles 100% of the time, despite more than 90% of all illegal meat imports arriving at the UK via these routes.

What about food that arrives under the guise of a 'commercial import'? – There is no difference. Food/POAO from around the world and from the highest risk areas for disease incursion such as FMD and ASF are also free to travel into the UK without being stopped, or physically restricted at this border, where they quickly leave and disperse without effective control into the UK via the national road network. This is because the BCP that must control and stop them, is located 22 miles away and outside of the Port Health Authority's control.

What does that look like on the ground? - It means commercially imported products, potentially contaminated with FMD, are not stopped and held at this border in the way that Defra have reassured they are, in their responses/messaging following the recent FMD outbreak. In fact, this practice of not stopping and leaving the Port Health Authority area of

control, **only happens in this way at the Short Straits**, where ironically and indeed worryingly, the majority of food/POAO within FMD scope arrives.

DPHA have been left responsible for safeguarding the border, but without the means (infrastructure (a BCP) or secured and appropriate funding) to effectively control it, despite the now escalating volumes of illegal food/POAO arriving since the implementation of the BTOM, and the intensifying risk this is presenting to GB's biosecurity, public, animal and plant health.

What is the current scale of illegal food/POAO? – DPHA have now removed over **230** tonnes of illegal POAO. To help put into context the scale of the escalation we are tackling, for the same set operational period, in the last 3 years the following volumes have been seized:

- 1st January to 28th April **2025** - **>70** tonnes removed.
- 1st January to 28th April **2024** - **24** tonnes removed.
- 1st January to 28th April **2023** - **13** tonnes removed.

Yet despite these undeniable volumes, and indeed, the government confirming in its own [FMD Risk Assessment on virus spread from Hungary and Slovakia to Great Britain](#) (published 16th April 2025) that a '*major concern is the continued importation of high volumes of illegal POAO*' through Dover and that is – '*a major concern for spread of FMD (and other pathogens) into Great Britain*', we have experienced no change in Defra's stance or funding proposals to mitigate this threat.

What is the Funding Position? – For 2025/26 DPHA have been offered £3.1 million to deliver pro-active illegal meat controls at Dover AND at Coquelles. This figure is not sufficient nor are the stipulations made by Defra, that Vets and the system used to record our seizures will no longer be paid for. £3.1 million enables less than 0.2% of vehicles arriving via Dover to be checked and provides no provision for checks at Coquelles at all. No funding commitment has been indicated for post March 2026.

Subsequently I wrote to the Minister on 15th March to emphasise – '*I'm duty bound to advise, as I have previously that £3.1 million is not sufficient to appropriately safeguard this critical and unparalleled border. This is because this figure will only fund/enable **minimal checks** to take place during a 20% operational window, meaning that 80% of the time there will be no pro-active checks. In addition, £3.1 million provides no funding provision to complete any checks at Coquelles (entry point for Channel Tunnel) where it will remain that, unless Defra provide appropriate funding, there will be zero checks and 0% operational coverage. This is not considered appropriate with the current threat level posed to GB.*'

And I advised that – '*We continue to see escalating numbers of large loads containing illegal products of animal origin (POAO) clearly not for personal consumption and destined for commercial markets, simply driving through. In addition, we have provided you with examples of illegal and banned meats arriving via the BTOM route that end up on our high streets for sale, having evaded check, control or interception by Sevington (via the very route Defra designed and implemented to prohibit such imports). And of course, Foot and Mouth Disease (FMD) products requiring prohibition, being auto-cleared by Defra's own system (TODCOF) to travel into and across GB.*'

As such – '*It is for these facts, that I (Manzano) cannot (at the Short Straits) support your assertion that the "Border Target Operating Model (BTOM) **continues to provide a robust Sanitary and Phytosanitary (SPS) system of commercial import controls to protect UK biosecurity**". Or when referring to the suitability of £3.1 million, that "the offer is reviewed against the Government's priority to protect UK biosecurity, and **I am** (Baroness Hayman) **confident that it strikes the right balance.**"*'

I then reiterated to the Minister that – ‘The Defra team advising you, have neither visited our operations, nor discussed them with us in any substantive terms, and the letter provides no narrative to explain what evaluation, plan, or strategy has been considered or conducted to conclude that a figure of £3.1 million was required. It is therefore difficult to understand what would make you ‘confident that the... right balance’ has been met that can deliver the controls needed to protect the nation from the sheer volumes we are experiencing at Dover and the undeniable risk that is presenting to GB. Especially when the figure outlined (£3.1m) was not one suggested in the modelling options that Defra requested DPHA provided’.

I made clear that – ‘The letter also asserts that *your team have independently decided that the Official Veterinarians (OV’s) that we use, are no longer needed* - ‘Defra does not consider that these staff are required, and they will not be covered by the 3.1 million funding figure’. This is not a position that is and can be accepted. *The OV skill set is unreplicated within the team, and they are critical to the successful delivery of this highly challenging and unique area of work, which includes complex identification processes of POAO and animal by-products etc.* This is not, as has been implied previously, simply a case of identifying a salami or some sausages. Indeed, the presentations seen are often more complex than would be found within a BCP itself. As the statutory authority responsible for safeguarding Port Health matters at this border, and for the reasons previously outlined, **DPHA would be unable to deliver this function without the minimal OV provision currently used’.**

What did the response from the Minister say? -The Minister has not responded to this letter or provided information or evidence to confirm why Vets (who have been in post and paid for by Defra since 2022) are now, in the midst of an FMD crisis, and the risk of FMD entering the UK ever present, be no longer needed. Or indeed, how these checks will and can be completed moving forward, within the funding restraints they have stipulated.

Although I have not received a response, the Minister has since introduced additional personal import controls (12th April 2025), reassuringly described by Defra as a [‘Ban on personal imports of meat and dairy products extended to cover all EU countries to safeguard the UK food system and farmers against foot and mouth disease’](#). This announcement was made without warning or direct contact from Defra to DPHA on how it would be delivered, or the provision of appropriate funds to complete these and the other additional checks. It is therefore hard to understand how additional checks, without additional resources to complete them, will protect our farmers.

Final points of clarity I would like to make-

1. I have reviewed and fact-checked the [timeline and account](#) provided by Helen Buckingham (3rd March 2025), regarding Defra’s FMD response, action, and TODCOF auto-clearance activity. I have found it to be an accurate account of what happened during that period. TODCOF was not switched off, and products within scope of the FMD controls did auto-clear the system; and there are reports that some FMD-susceptible commodities, are still able to auto-clear now. The systems in place are not effective and Defra are aware of this.
2. TODCOF (auto-clearance) was not ‘superseded’ in the way implied by Defra’s in its pro-active blog (13th February 2025) titled [Inaccurate reporting on foot and mouth disease controls](#). It stated – ‘*There has been inaccurate media coverage regarding foot and mouth disease (FMD) controls with reports that it took six or seven days for controls on commercial imports to take effect...These claims are inaccurate*’. These claims were not inaccurate, TODCOF did, and continues to, undermine import systems of control. In the context pro-claimed, it is misleading to state that ‘*We ensured that*

auto-clearance facilities were superseded by robust biosecurity controls which were implemented at pace following confirmation of the outbreak.

3. FMD susceptible products are not prevented from passing the border as has been claimed by Defra in recent press reports [‘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.’](#) and as highlighted to the Committee by the Lead Official Veterinarian ([16th March 2025](#)) when advising on the effectiveness of the current measures.
4. IPAFFS is not fit for purpose. If Defra are unable to accurately collate and verify data from their own system, on what has, and is coming into the UK, on what has been checked and on what is auto-clearing etc. Then they are unable to verify and validate their claims regarding auto-clearance and that the borders and its systems are working robustly. I was surprised therefore to read the Ministers direction to the Committee in their [letter 21st March 2025](#) – ***‘I am keen that the Committee does not place undue weight on updates to the Import of Plants, Animals, Food and Feed System (IPAFFS) as it is simply an enabling tool’***. IPAFFS is the very and only system designed to oversee and control all imports, auto-clearance, checks, releases etc. across the UK. It is the central system of control; which without it, an import entry cannot be made for SPS goods. This is also the same system the retained permanent secretary and previous ministers advised the last Committee, was ready to go, AND the current ministers and their senior officers consistently imply is working effectively.
5. Defra have not paid DPHA for all works completed in 2024/25 and have provided no information or reassurance as to how 2025/26 will be paid, and no funding commitment past March 2026. In addition, our freezers are damaged and need urgent repair. This is due to constant overload as they were not designed for the weights/volumes that we are seizing. Without freezer storage we will be unable to hold seizures. Defra were notified of this 27th March and urged to provide urgent funds to resolve this. Over a month on, it remains outstanding and without fix. We cannot afford to continue to deliver the service in this way. Without prompt resolution and secured and appropriate funding past 2025, we will have no other option than to stop the checks. Which, in some ways, is the outcome many believe Defra may seek to achieve. Without our proactive checks and voice at the frontline, these seizures will fall flat and silent. Meaning the scale of the problem could be shielded or presented in a way that looks like the threat has been resolved.

It is for these reasons that fundamental change is needed in the way we approach and protect this unequivocal border. But to achieve this, tough questions must be answered. It is not acceptable for any department, not least that of government, to deflect from clear flaws that are happening in plain sight. With warnings seemingly ignored, and non-compliance normalised.

For example, prohibited goods not being stopped at the border and simply going inland, auto-clearing systems, or food simply not attending the BCP and entering our markets without control. The potential impact of such activities on our markets, and the fact that systems are clearly not ‘robust’ or effective, is now seemingly dismissed, accepted, or proclaimed as something someone else will find and control i.e. ‘make an inland referral’ as if this action alone, will immediately remove the risk and threat posed.

Transparent recognition of where things aren’t working and why, is required if action to fix them is to be achieved. However, since raising concerns that the decisions and the implementation of them at this border, meant that it was no longer able to operate in a bio-secure way, we have entered a void. Where it would appear, that Defra will not respond

appropriately without the full weight of a Select Committee or worse still, an outbreak to occur.

Our goal is to work with this government and future governments to deliver biosecurity controls that work, and to speak up when they are not. I was brought up to speak honestly and openly, put my hand up when something is wrong, to ask questions, to always help put things right, and to never be afraid to speak up. I therefore cannot ignore what is happening, it would be negligent of me to do so, or to advise otherwise.

Finally, I include recent case studies to show the reality of our daily work, why our Vets are so essential, and the need for appropriate facilities (Dover BCP) to contain and prevent disease incursion from this challenging, highly complex and cross-contaminating area of work. This is what's happening on the ground as you read this letter, as opposed to the narrative that may be provided by those who are disconnected from the border.

Yours Sincerely,

A handwritten signature in purple ink, consisting of a series of loops and a trailing flourish.

Lucy Manzano

Head of Port Health & Public Protection



Dover Port Health Authority Illegal Meat Case Study Examples





Case Study 1: Lamb Carcasses, Commercial Quantity via Personal Import Route

- 31 lamb carcasses - commercial quantity - transported in a transit van with a Romanian registration plate through the non-commercial route (i.e. presented as a personal import).
- Country of origin unknown. Driver claimed lamb originated from Romania, which presents an FMD and PPR animal health risk, but there were no health marks stamped on the carcasses indicating the country of origin and establishment. No traceability.
- Country of origin could not be confirmed. Significant biosecurity risk for all notifiable animal health diseases due to the unknown origin of the meat.
- Lamb is categorized as a 'medium risk product' and requires notification on IPAFFS and an Export Health Certificate. No paperwork provided by the driver. No pre-notification submitted, no Common Health Entry Document (CHED-P) or Export Health Certificate.
- Destination of the goods was unknown. Driver would not disclose the delivery address. Inland referral to local authority (LA) not possible.
- **427.4kg selected, identified and removed by DPHA for destruction.**





Case Study 2: Raw Meat and Dairy Products, Romania

- Vehicle displaying a Romanian registration plate transporting a mixed load containing personal imports and commercial quantities of cuts of lamb, pork and beef, dairy products, and packets of unidentifiable meat.
- Transport conditions were very poor. Boxes were bloody and leaking with evidence of cross contamination between products.
- Experience and expertise of the vets was essential to ascertain the species of the unlabelled meat to ensure compliant goods were not being disposed of alongside illegal products covered by safeguard measures.
- Some packages displayed the ID mark which indicated the products were not permitted for export from Romania.
- Animal health risk presented by the Romanian products - FMD, ASF and PPR.
- No health marks on carcasses. The country of origin of much of the meat could not be established, therefore the animal health risk presented for these products was unknown due to undetermined originating country.
- No import paperwork – no pre-notification no CHED-P or Export Health Certificate.
- No paperwork provided by driver to identify the destination.
- **522.4kg selected, identified and removed by DPHA for destruction.**



Case Study 3: Meat & Meat Products, Origin Unknown

- Whole pig and lamb carcasses (un-eviscerated), and meat products, many of which were unlabelled and unidentifiable. Required the Vets expertise to ascertain the species for many of the products so as to ensure application of safeguard measures was only applied to relevant products.
- Vehicle had Romanian registration plate but no health marks on carcasses and no ID marks on packaging. Country of origin could not be determined nor the establishments identified of where the meat products were produced.
- No paperwork – no pre-notification, no CHED-P or Export Health Certificate.
- Romanian meat products present a risk for FMD, ASF & PPR, but there is an unknown biosecurity risk for all notifiable animal health diseases when the country of origin is unknown.
- Un-eviscerated carcasses significantly increases the risk presented to public health.
- Products poorly packaged, leaking and bloody. Cross contamination of other goods evident within load.
- Handling of large carcasses challenging without specialist lifting equipment available and preventing further contamination of the load.
- **485.4kg selected, identified and removed by DPHA for destruction.**



Case Study 4: Mixed Load of Undeclared Commercial Goods, Romania

- Example of a GB registered transit van transporting commercial consignment of Romanian meat products. Illustrates the change in transport presentation where the origin of the vehicle registration plate cannot be relied upon when assessing whether a vehicle may or may not be carrying illegal meat from the EU.
- Commercially packed and labelled meat/ dairy products, commensurate with products typically found in retail shops selling Eastern European food on high street.
- Labelling on packaging indicated country of origin was Romania. Animal health risk presented: ASF, FMD and PPR.
- No pre-notification, no CHED-P or Export Health Certificate for porcine products from Romania.
- Customs entry had been submitted but despite this, through self-declaration, SPS port health checks can still be evaded and goods can enter illegally.
- Premises address details obtained from the Customs entry which indicated that the consignment was destined for a retail shop in Loughborough.
- DPHA referred to the inland local authority for their information and to determine what next steps to take.
- **269kg selected, identified and removed for destruction.**



Case Study 5: Moldovan Coach with Trailer Transporting Animal Products

- Lamb and rabbit carcasses, chicken feet, packaged and unpackaged meat products including offal found within the luggage store beneath the coach and within the trailer (unrefrigerated).
- The coach had a Moldovan registration plate but the country of origin of the meat was unknown. No health marks on carcasses, no ID marks on product packaging. Unable to identify the origin of the meat, therefore the animal health risk presented was unknown.
- If the meat was Moldovan, this presents an FMD risk as Moldova is a country that has not declared its FMD status in animals.
- No import documentation - no pre-notification, no CHED-P or export health certificate.
- Identifying the range of species was challenging. Some animal products were unidentifiable and required expertise of vet officials to identify the species and/or product to ascertain what it was and whether it was permitted for import.
- Some destination addresses provided on packages – locations were UK-wide.
- Over 3 tonnes seized.
- Insufficient freezer capacity to store the entire seizure from this one vehicle and trailer.
- **3,033.2kg selected, identified and removed by DPHA for destruction.**



Case Study 6: Lamb Carcasses, Moldova

- Moldovan van and trailer selected in tourist lane.
- 30 lamb carcasses bearing no health marks – country of origin unknown and unconfirmed. No establishment number.
- Handling large number of carcasses was challenging without specialist lifting equipment and ensuring the contamination risk was contained and controlled.
- Moldovan ID marks on some meat and dairy products. Large quantities of unlabelled meat and eggs.
- The load presented an FMD risk as a minimum - Moldova has not declared its Foot and Mouth Disease (FMD) status in animals. For the unlabelled products with no traceability, the country of origin was not established and the animal health risk of the country unknown (and significant).
- Safeguard measures for FMD/ASF/PPR do not apply to non-EU countries such as Moldova. The vets have exceptional knowledge on the rest of world personal imports policy and were able to provide expert guidance in a time sensitive environment, enabling the team to process this complex load efficiently and legitimately, ensuring that only the non-compliant elements of the loads were seized.
- **1255.8kg selected, identified and removed by DPHA for destruction.**

