

Title EFRA Committee report and recommendations

Subject Biosecurity at the border: Britain's illegal meat crisis and UK-EU trade: towards a resilient border strategy

Date: 09 September 2025

From Heather Jones, secretariat of the FLG

Ref HC1296 Third Report of Session 2024–25 and HC 1297 Fourth Report of Session 2024–25

To Rt Hon Mr Alistair Carmichael, Chair of Environment, Food and Rural Affairs Committee

Dear Mr Carmichael,

The FLG have written to the EFRA Committee on a couple of occasions during the process for this current inquiry into UK biosecurity – and we are very grateful that the Committee has seen to publish our evidence.

We have been reading the Third Report and Fourth reports (HC 1296 / HC 1297) and we welcome its recommendations and the detail contained within. Of particular note, and the reason for the FLG to contact you as Chair of the EFRA Committee again is in the context of the recommendations of the 2 reports, including:

“Recommendation - A taskforce for illegal imports of animal products should be established by November 2025, led by the Minister for Biosecurity, to provide oversight of the strategy's design and implementation and to drive improvements. The taskforce should at least include the Chief Veterinary Officer; representatives from the Animal and Plant Health Agency, the Food Standards Agency and Food Standards Scotland including the National Food Crime Unit and Scottish Food Crime and Incidents Unit, and Border Force; and local government representation such as port health authority leaders, the Association of Port Health Authorities, the Chartered Institute of Environmental Health and the Local Government Association. The taskforce must have credibility with all stakeholder groups and should spend time with operational teams. The taskforce should report annually and refine the strategic approach to tackling meat smuggling as required”ⁱ

Our ask is that the FLG be considered to join the taskforce from the outset – in order to bring an industry perspective to the discussions, both as critical friends and to add value from our decades of knowledge and expertise at the short straits. This offer spans the recommendations of both reports. As we represent the customs agents and transport / logistics sector and several of us are based in Dover and live / work around the area and have done for many decades – we are ideally placed to add local knowledge and value to the group's discussions. Many of the “personal imports” of larger quantities of meat and products of animal origin are commercial movements anyway, some even entering the UK via the freight routes.

FLG members would also complement the Committee recommendation to improve targeting of suspect loads. As customs agents, we have the data - in advance - about the consignments, the drivers and the timings, and we have worked alongside Dover Port Health Authority (DPHA) and UKBF for decades sharing our data and intel with them - local, national and international knowledge

and contact information (i.e. about the vehicle, driver, routing and timings) that officials simply do not have.

The short straits is a unique transport route, with unrivalled volumes of traffic each day, and because of that absolute need for fluidity, driver notification is one of the most difficult concepts to deliver. The previous government have failed to execute a reliable working model for driver notification, evidenced by the fact that officials had to resort to the Timed-Out Delivery Consignment Feature (TODCOF) which auto clears consignments because the link between the IPAFFs – CDS IT systems failed to deliver a workable notification system for drivers entering the UK via the short straits. Additionally, the previous government's attempts to design and deliver a strategic solution within the "Single Trader Window" programme have also failed, and that programme remains "paused".

Also, in the context of recent animal health risks, e.g. foot & mouth disease threat in the EU – many drivers who should have presented at Sevington Border Control Post (BCP) because they were carrying restricted meat / products of animal origin either did not receive a message to attend the site, or simply ignored it. This is because there was and is absolutely no mechanism of enforcement to ensure that trucks leaving the port or tunnel attend Sevington. Also, for those consignments which did present at Sevington BCP, they arrived only to find that the facility was not equipped with the appropriated equipment/infrastructure required to facilitate the required intervention appropriate to the product that needed to be examined. In addition, the system is fundamentally flawed in that when the driver is told to leave the site, they are simply given a slip of paper with the text "clear to exit". We know of examples of HGVs with restricted products, which did not return to the port of Dover or the tunnel for re-export. If they had returned to the port or tunnel, they would have required customs paperwork to re-exit the UK and that – in many cases - does not happen – but the key point remains that there is nothing at all in place to ensure that the truck does return to the point of exit.

The report also recommends that the taskforce should consider whether regional expert contacts would be an effective tool to support and connect enforcement teams, and should consider how imported food verification training can be disseminated. FLG applaud this concept, and that this is also an area where we could add significant value, as we can demonstrate by being involved in the taskforce from the outset –there are some 29 border agencies who operate at the short straits, and we have worked with most of them and know how they should interact better with each other **and industry**. On all matters relating to Brexit, all 3 of us have been involved – in one context or another - in cross government / stakeholder meetings, task forces and round tables on the full range of border related issues.

FLG recognise that the challenges and resource pressures for compliance and enforcement at the port of Dover and the tunnel is a complex area, and where stop & search powers are also to be reviewed, as are the requirements for BCPs going forward. In our view, the government decision to site the government-run BCP for the short straits as a sole site at Sevington was the wrong one. The BCP (which is still fully equipped as a state of the art BCP and is being run to temperature) at Bastion Point should have been the primary BCP for the short straits. The huge Sevington BCP could not and cannot justify its existence, aside from the fact that the port health services provided there being inefficient. The declared operating expenses for the site and the revenue received from the Common User Charge (CUC) revenue to run the BCP, is evidenceⁱⁱ that there is a clear deficit. FLG have been and remain in favour of the closure of the Sevington BCP **and** the re-purposing of Bastion Point. Customs agents are also located around the Bastion site as well as in the town – unlike at Sevington – therefore providing a ready-made resource for customs and border formalities – and importantly - on a 24/7 basis, which is also something not provided at Sevington BCP.

Once the UK and EU commence discussions on a new SPS deal, and the common understanding will become more formalised towards the implementation of a Common Sanitary and Phytosanitary Area. Bastion Point has already been agreed in previous discussions with the EU that it would fulfil the requirements to become an “SPS zone”. Sevington would not, as shown by the previous government’s introduction of domestic legislation to make the site into a BCP. There also has to be a solution for the processing of illegal meat / products of animal origin – as identified in the report.

In conclusion, FLG have been corresponding with a series of ministers and Secretaries of State (DEFRA, MHCLG and DBT) since 2023 on the failed implementation of the Border Target Operating Model (BTOM) – we have been asking – without success or adequate responses - for an urgent review of the regimes and issues contained within the BTOM document. We now hope that the EFRA Committee reports and the recommendations contained within it lead to action – and to include industry experts from the outset. In particular, to use those experts with knowledge and experience of the short straits.

FLG have continued to challenge proposals and have repeatedly raised concerns that the BTOM decisions would penalise the critical food supply chains that it seeks to protect, by increasing and not reducing burdens and costs on business. This is now the reality of food being imported via the short straits – and there is little to no control over illegal imports of meat / POAO.

In our view, the situation is now perverse and at a tipping point. We applaud the EFRA Committee for the excellence and professionalism shown during the various sessions and the robust nature of the two reports and their recommendations. FLG supports the ask for immediate action on illegal meat imports – and before the problem becomes irreversible and those affected aspects of UK farming are brought to their knees. The current drive for a new SPS deal with the EU is very welcome. We feel so strongly that this presents the last opportunity for the government to address and correct the fundamental failings of the BTOM, the broken border at the short straits, including the inefficiencies of the Sevington BCP – and to put in place measures and policies that will actually work to protect the UK biosecurity and also address all of the issues raised by industry

FLG respectfully wish to be considered to join the review / taskforce team and or be called in as “regional experts”, in order to prevent future policies having a catastrophic effect on business and the wider imported food sector, including the ability to adequately support compliant UK food importers.

We remain at your disposal, yours sincerely

Heather Jones

Heather Jones

Richard Catt

Richard Catt

Mark Johnson

Mark Johnson

ⁱ Page 26

ⁱⁱ FOI responses received by FLG