



Association of Port Health Authorities

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Mr Alistair Carmichael MP
Chair of the Environment, Food and Rural Affairs Select Committee
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Dear Mr. Carmichael,

I write on behalf of the Association of Port Health Authorities (APHA) regarding proposals to remove or substantially reduce sanitary and phytosanitary (SPS) controls on EU goods and to pursue dynamic alignment with EU SPS policy. Given the implications for border biosecurity, public health, animal health, and the resilience of the UK's import control system, APHA considers that these proposals require detailed examination supported by clear evidence.

To assist the Committee, we set out below specific questions arising directly from operational experience and the issues highlighted in our draft correspondence. We consider these questions essential to any informed assessment of the proposals.

1. Evidence of Risk and Current Interceptions

1.1 What evidence does the Government rely upon to demonstrate that removing or substantially reducing SPS checks on EU goods will not increase risks to food safety, animal health or feed safety, given that EU goods were historically subject to little or no routine inspection and therefore presented unknown levels of non-compliance?

1.2 How does the Government account for the significant quantities of non-compliant and high-risk goods currently being intercepted at UK borders - including at Dover, east and south coast ports, and Sevington - where many tonnes of goods originating from, or transiting through, the EU are removed from the food and feed chains each year? Nearly 34 tonnes of the imported products were uncovered at the Port of Dover in January 2026 - the highest ever monthly total. As of 31 March 2026, Dover Port Health Authority removed and prevented over 422 tonnes of illegal meat from entering the UK.

1.3 What lessons has the Government drawn from the seizure of over 200 tonnes of non-compliant goods at Sevington since it became operational, particularly where those goods were imported by ostensibly compliant and reputable commercial operators?

1.4 How does the Government assess the risk that reducing EU SPS controls will increase the likelihood of unfit food or animal health threats entering the UK, in light of documented post Brexit incidents involving EU supply chains?

1.5 What steps (given dynamic alignment of SPS controls) will be taken to support Border Force in prioritising and resourcing future controls as the known and evidenced abuse of illegal personal imports through south and east coast ports continues or increases with an absence of SPS controls (presumed free movement)? Given that the understood biosecurity risk appears substantial and is wilfully circumvented.

1.6 Regarding the removal of imported goods from the food chain by inland authorities, what steps and resources will be provided to district, county councils and devolved administrations to ensure the on the ground inspectorate are able to respond to the local challenges? Where food is not monitored at the border, enforcement is pushed back to storage depots, cold stores, and approved premises both solely products of animal origin and hybrid non approved food businesses. We believe this is an exceedingly important element of the future strategy for food law enforcement.

2. Border Target Operating Model (BTOM) and Operational Performance

2.1 Given that port health authorities have continued to deliver strong performance despite acknowledged flaws in the Border Target Operating Model (BTOM), including criticisms previously raised by the EFRA Committee, what is the justification for reducing controls at a point when operational capability and enforcement effectiveness are demonstrably improving?

2.2 What assessment has been made of the impact that reducing SPS controls would have on the resilience of the UK's border control system, particularly in destabilising arrangements that have only recently become operational?

2.3 Why is the Government proposing to move away from the BTOM - published after significant delay and promoted as a major modernisation programme - without setting out how its stated objectives will otherwise be achieved?

3. Governance, Data and Systems Readiness

3.1 How does the Government respond to concerns arising from well documented failings in SPS reform delivery, including incomplete import data, unreliable digital systems, and inconsistent policy communication that has required repeated short notice changes by local authorities?

3.2 What assurance can the Government provide that any further SPS reform will be supported by reliable data, stable digital services, and clear operational guidance, rather than assumptions about risk?

3.3 What contingency arrangements would be in place to manage system outages, intelligence gaps, or compliance failures in an environment with reduced SPS intervention?

4. Business Impact and Claimed Efficiencies

4.1 Given that customs controls are expected to remain fully in place even if SPS checks are reduced, what evidence does the Government have that businesses will realise genuine efficiency savings rather than experiencing delays elsewhere in the system?

4.2 Why has greater priority not been given to addressing duplication, unclear accountability, and poor system integration between SPS and customs controls, rather than removing SPS safeguards outright?

5. Modernisation, Biosecurity and Supply Chain Resilience

5.1 How does the Government reconcile proposals to dismantle SPS capability with the progress already made by port health authorities in modernising controls through intelligence led targeting, improved data use, and automation?

5.2 What consideration has been given to the fragility of just in time supply chains and the UK's heavy reliance on EU imports, particularly in light of wider resilience concerns highlighted in Professor Tim Lang's 2025 report to the National Preparedness Commission? ¹

6. Dynamic Alignment and Trade Policy

6.1 How would dynamic alignment with EU SPS regimes protect UK interests where the UK would hold only observer status on EU SPS committees yet be required to implement resulting rules?

6.2 What assessment has been made of the risk that UK farmers and producers could be undercut by EU imports produced to lower welfare standards under an aligned regime?

6.3 Why has the Government not prioritised reciprocal arrangements that would reduce export health certificate requirements for low-risk UK goods entering the EU, given the potential growth benefits for UK exporters?

6.4 What analysis has been undertaken of the implications of re adopting the EU SPS model for non-EU imports, including the likelihood of increased checks and bureaucracy that would reverse efficiencies achieved under the BTOM?

7. Consistency of Controls and Disease Risk

7.1 How will the Government ensure parity and consistency of SPS controls across all UK entry routes to prevent non-compliant operators routing goods via ports with lower levels of control?

7.2 What specific safeguards will remain in place to protect against major transboundary threats such as African Swine Fever, particularly where capacity and enforcement coverage are uneven?

8. Workforce, Funding and Local Authority Risk

8.1 What assessment has been made of the workforce impact of reducing SPS controls, including the loss of specialist inspection, enforcement and incident response skills that take many years to develop?

8.2 How will the Government prevent permanent weakening of national biosecurity capability through the loss of experienced port health staff who cannot be readily replaced if controls later need to be reinstated?

8.3 If reductions in SPS controls lead to redundancies within port health services, will the Government commit to providing Section 31 grant funding to fully cover eligible redundancy and associated costs?

8.4 When will local authorities be provided with confirmed implementation timelines and guaranteed funding arrangements to enable lawful workforce planning without carrying undue financial risk?

9. Stakeholder Confidence and System Credibility

9.1 How does the Government respond to feedback from importers, agents and logistics operators indicating that proposals to reduce safeguards are viewed as unworkable and unsafe without a clearly defined alternative operating model?

9.2 What steps will be taken to restore confidence among frontline operators that future reforms will strengthen, rather than undermine, the UK's biosecurity advantage as an island nation?

We respectfully urge the Committee to seek clear, evidenced answers to these questions before supporting any reduction in SPS controls or movement towards dynamic alignment. Without a transparent evidence base, stable funding, and a robust operating model, there is a significant risk that recent gains in border biosecurity and system capability (technical upskilling) will be lost.

We would also like to thank the EFRA committee for its unwavering dedication to improving this regulatory landscape and its impressive understanding of the complexities involved in doing so.

Yours sincerely



Anthony Baldock CEnV FCIEH
Chair
Association of Port Health Authorities

¹ *Just in Case: narrowing the UK civil food resilience gap. Lang. T 2025.* [The report - Food Security 'Drive-bys' of disease-risk illegal meat and plant products avoiding border checks revealed in new data - Committees - UK Parliament](#)
[Record levels of illegal meat seized at The Port of Dover - BBC News](#)
[Ashford Port Health Authority seizes 200 tonnes of unsafe food during checks at Sevington Inland Border Facility](#)

Background information:

The Association plays an important role in protecting public health through liaison with government departments and agencies, local authorities and internationally through the EU, the World Health Organisation and trade bodies. It contributes significantly to national and international policy development and keeps its members up to date with changes in legislation and guidance.

The Association is directed by an elected Executive Board and has a regional Port Liaison Network with groups based in Scotland, Northern Ireland and Wales, and a number in England. They meet several times a year. If you wish to attend or contribute to the work of the Association, please get in touch. <https://www.porthealthassociation.co.uk/>