

Office of the City Remembrancer, City of London Corporation – Written evidence FUU0007

The City of London Corporation in its capacity as the London Port Health Authority (LPHA) covers a district extending 94 miles along the River Thames from Teddington to the outer estuary. The area includes the London Gateway port together with the ports of Tilbury, Tilbury 2, Purfleet, Thamesport and Sheerness. The area also includes London City Airport as well as the various docks and dockland areas which have now been redeveloped.

These ports have a variety of global trades, including deep-sea third country trade and short-sea EU trade, which can be containerised, roll-on-roll-off and lift-on-lift-off. Due to the location of these ports (mainly in Kent and Essex), the City Corporation is concerned about the changes in patterns of trade that may occur as a result of the UK leaving the EU, and has consequently increased its resources in an effort to provide some resilience against increases in trade. The City Corporation is grateful for the support from DEFRA and the Food Standards Agency, which has enabled the LPHA to start recruiting and start training new staff.

There are concerns that the City Corporation will not be able to deliver the expectations set out in the Border Operating Model, given the increase in checks required, the challenges with recruiting specialist staff, training staff in a Covid-secure environment and the tight timescales. These challenges, which affect all Port Health Authorities, would lead to difficult decisions needing to be made by Government about whether to delay the implementation of border controls. If the implementation dates are maintained and ports are at different stages of readiness, this could distort the level playing field, as well as the flow of goods between different ports, with some traders likely to divert to a perceived lighter touch BCP.

Due to the short timescales to recruit and train new port health staff the City Corporation has proposed the following measures:

- A minimum of 1% physical checks are outlined the Business Operating Model, but Port Health Authorities are concerned that this may quickly change. It is proposed that this regime is confirmed for at least a year; except in exceptional circumstance when a Public or Animal Health risk is confirmed. In addition, the percentages should not be increased until the capacity of Port Health Authorities to deal with any increases is known.
- While it is welcome that the introduction of checks on organic food and feed from the EU have been pushed back to July 21, a phased

introduction of the checks from the EU, starting at between 1 and 5% and increasing over time would assist Port Health Authorities. This assumes a high level of compliance owing to the current alignment.

- In line with the proposal above, a phased introduction to Illegal Unregulated and Unreported (IUU) fish checks would allow time to recruit and train new port health staff.
- Permit a risk-based approach to rest of the world (RofW) import controls. These are not long-term proposals, they would be time limited, and could be flexed as circumstances change. The aim is to rapidly resource, capability generate and deploy this resource as soon as the required level of competency has been demonstrated.