

Office of the City Remembrancer, City of London Corporation – Written Evidence (TIG0006)

1. This submission provides an update further to the City Corporation's submission to the EU Goods Sub-Committee, published 18 February 2021.ⁱ
2. 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 and the various docks and dockland areas which have now been redeveloped.
3. 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. Owing 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 training new staff.
4. For the City Corporation acting as the London Port Health Authority, the latest throughput estimates from DEFRA/HMRC have increased significantly; from 50k to 200k. The City Corporation was also advised in April that Sheerness would be accepting high-risk food and feed from the EU. In light of this, the City Corporation needs to increase staffing resource further. As such a recent application has been made for further funding through DEFRA's Port Health Transition Fund to maintain and extend the port health resource. However, this funding is only provided to 30 June 2022, on the basis that Port Health Authorities (PHAs) can charge from this point. DEFRA should consider offering an underwriting for the whole of 2022/23 to provide PHAs with some comfort as the true trade patterns will not be fully understood for at least 6 months. An underwriting was offered for 2021/22. A number of PHAs, including London, have recruited fixed term staff for a significant period due to the implementation delays and they would be eligible for redundancy payments if they are not required following the 30 June 2022. DEFRA should also consider underwriting these legacy costs.
5. This short-term funding profile also impacts the ability of PHAs to offer attractive recruitment packages for specialist officers such as Official Veterinarians, Port Health Officers and Official Fish Inspectors. Most are in permanent roles and will not move for a short-term contract, however offering long-term contracts presents a risk for PHAs.

6. Owing 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 in 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.
 - Permit a risk-based approach to rest of the world 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.
 - A contingency plan to be shared with PHAs to address the situation should they experience overwhelming demand on and beyond 1 July 2022.

28 October 2021

ⁱ <https://committees.parliament.uk/writtenevidence/22392/pdf/>