

Written evidence submitted by the Office of the City Remembrancer, City of London Corporation

1. The City of London Corporation has a statutory duty under the Animal Health Act 1981 to enforce the regulations for imported animals for the whole of Greater London, and acts on animal welfare-related legislation for a number of London Boroughs and local authorities in the southeast of England.
2. The Corporation has also operated the Heathrow Animal Reception Centre ("HARC") for several decades. It was established under Section 54 of the 1981 Act and was the first purpose built live animal facility for imported animals at an airport and as such led the way for Border Inspection Posts/Border Control Posts ("BCP").
3. The City Corporation is deeply concerned that the recent relaxation of application of the rules establishing BCPs may fragment the service offered to importers and exporters, endanger Heathrow's reputation as a gateway to the UK for live animals, and bring with it significant risk to animal health and welfare. As a facility with statutory duties, the City Corporation's remit is to ensure the welfare of the animals and compliance with the regulations. The Corporation's operation of HARC will be compromised if its costs are not covered by the fees charged as a BCP, especially in the current climate, and this would have a negative impact on enforcement activity and the current high levels of compliance currently seen on imports at Heathrow and for which there is international recognition. There has been an inconsistent approach to funding Live Animal Border Control Posts, with airport BCPs seemingly reliant on commercial forces and therefore presenting a risk to the quality of controls.
4. Approximately 75-80% of live animals imported by air are flown into Heathrow and come through HARC. Corporation staff work very closely with the Animal and Plant Health Agency (APHA) and Border Force to ensure animals are shipped in compliance with the law. It has come to our attention that a number of private companies (shipping agents), have applied to operate their own Border Control Posts for their clients at Heathrow and it is understood that at least one has had their plans approved. The basis on which such an application has been made and purportedly approved is not clear. Such private companies are likely to offer services only in respect of certain areas of the market, whereas HARC deals with the importation of all animals, from domestic pets to animals destined for zoological facilities. It is not understood what policy that the Secretary of State would adopt to consider an application to run a Border Control Post. Additionally, it is understood that there is nothing in the legislation that requires the Secretary of State to designate a BCP (under Article 59 of the Official Controls Regulation (Regulation (EU) 2017/625)) simply because an application has been made that will meet the

standards of a BCP, only that if the Secretary of State does designate a BCP then it must meet the required standards.

5. Prior to the COVID-19 pandemic, Heathrow Airport Limited (“HAL”) and the Corporation were in discussions to open a new c.£20 million facility which would have continued to enhance the reputation of the UK and Heathrow in leading the world in portal live animal facilities at airports. However, the business case for this may no longer be viable. HAL has previously bid for monies from the Port Infrastructure Fund, to assist with facilities but was unsuccessful. In addition, the City Corporation has responded through HAL to a DEFRA-initiated Market Sounding for Live Animal Infrastructure Fund, for which the Corporation are still awaiting a decision. It is noted that the Government are funding significant BCP facilities at Ashford, Dover and in North Wales, but it appears the premier point of entry by air being left to market forces.
6. Concern regarding multiple points of entry at Heathrow for live animals have also been expressed by other stakeholders, including government agencies. There are also concerns about consistency and independence relating to animal welfare, the loss of skills, knowledge and facilities to deal with the wide variety of animals that enter through Heathrow. The Corporation believes that supporting the development of a single facility would ensure consistency and independence, which will protect and promote the welfare for all live animals imported into the UK via Heathrow. The Corporation is keen to ensure that the Government understands the serious consequences at Heathrow Airport of designating multiple BCPs acting for their own clients and risk such a move puts on the international reputation of UK and Heathrow Airport.

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