Written evidence submitted by Heathrow Airport

Background and Context

Heathrow Airport welcomes the opportunity to respond to this inquiry and recognises the Committee's important work in monitoring progress on EU Exit and the impacts on the UK border.

Heathrow is the UK's biggest port by value and only hub airport[1]. The airport accounts for two thirds of all trade transported by air in the UK, worth over £161bn in 2020 – more than the seaports of Southampton and Felixstowe combined. We support the UK's economy, delivering trade and tourism to all corners of the globe, including the EU.

According to UK Trade Information data, over half of all UK trade of live animals passes through Heathrow, making the airport crucial to EU-UK trade post-EU Exit. These movements are due to Heathrow's status as the UK's only hub airport. Airlines, businesses and passengers choose Heathrow as a result of the global connectivity only available at the airport, and the opportunities this brings.

This was evidenced over the pandemic, as some routes reallocated to Heathrow and cargo-only flights to and from the airport increased. Despite the devastating impact that the COVID-19 pandemic has had on the aviation industry, Heathrow has remained open and operating over the past 18 months, keeping vital supply lines going, including the movement of live animals, plants and vaccines between the EU and UK – all crucial to industries across the country.

This response outlines Heathrow's views towards the Government's preparations for border changes from 2022, particularly the movement of live animals and full import controls. We have summarised our views below.

Current challenges and opportunities

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[1] https://mediacentre.heathrow.com/pressrelease/details/81/Corporate-operational-24/13243

Given our role as the UK's biggest port and handling trade in live animals, we are acutely aware of the impact full border controls will have on the airport and the businesses that operate and trade through it.

The unique nature of Heathrow and most airports in the UK must be taken into account. Unlike sea and other ports, Heathrow does not own or operate the individual Border Control Posts (BCPs) on site – rather, these are managed by independent organisations.

The designated BCP for live animals at Heathrow is the Heathrow Animal Reception Centre (HARC), run by the City of London Corporation, with a separate application by Airpets to run another live animal BCP recently granted approval by DEFRA. APH also operate the plants and POAO BCP at Heathrow. While we do not have a commercial relationship with these parties, as the BCP operators we have worked with BCP operators to help them prepare for the upcoming changes resulting from EU Exit.

The Committee should also note that the City of London Corporation have a statutory responsibility for enforcing the regulations for imported animals for the whole of the Greater London area. The legislation for the HARC means that it operates as a service only, recovering reasonable costs – so its commercial model is different to that of other businesses.

The HARC is a key entry point from the EU and the only BCP in the UK that can handle all animal types in one facility. It is imperative that the Government (DEFRA and the BPDG) ensures that BCP capacity and border changes do not compromise on Heathrow's ability to continue offering the full range of live animal capabilities not offered by other airports in the UK. This includes hatching eggs for vaccines that pass through the airport into the UK, via the HARC.

Heathrow's established route network – bound by slot regulations and geographical considerations – is the reason the airport hosts the only UK BCP capable of handling all animal types. Our popularity and transit capabilities make Heathrow the number one option for importing animals and plants into the country. It is not therefore the case that increasing capacity at other UK airport BCPs would necessarily meet current or future air cargo demand for live animals to/from the EU.

This helps to explain our current position and the opportunities and challenges presented by EU Exit. The opportunities and challenges can be split into three areas:

- Physical capacity
- Resourcing
- Designation of Border Control Posts (BCPs)

Physical capacity
With the upcoming Brexit changes and increased import controls, the Animal Reception Centre is likely to be limited on capacity, impacting its – and the UK's – ability to handle animals arriving from the EU. This also could have a knock-on effect on the UK's ability to trade and import into Heathrow from other countries around the world. Extra checks on animals means extra time at the BCP, limiting space for other animals – including those from the rest of the world – to be processed and checked.

The Government must work with the HARC and other BCPs on policy and operational solutions to streamline this inbound check process and avoid an extensive backlog or potential rejection of animals at the border.

While it is encouraging that DEFRA and the BPDG have recognised our role and have engaged with us on these concerns, we have not had any clear direction on resulting actions or solutions to minimise possible congestion or disruption. The proposed Live Animal Infrastructure Fund will go some way to supporting trade with Europe, but it is unclear when this will go live and how airports will be included in the assessment criteria. We await further information on this.

Resourcing
In addition to capacity constraints, APHA and DEFRA must recognise the importance of ensuring commensurate resource to support these BCPs in dealing with increased checks on live animals originating from the EU.

In recent months, we have been informed that there have been occasions where there has been insufficient physical APHA (Vet) resource to check animals. Government must ensure there is sufficient APHA resource to manage the additional checks on plants and animals' post-EU exit. On occasion, staffing levels have been insufficient to manage imports checks at UK BCPs, leading to delays and capacity concerns – this will increase as further checks are introduced from March 2022.

We appreciate that investment will be required in recruiting and training new staff, but have not been informed when and how this would happen. In addition, BCP partners have told us that turnover of staff is quite high, meaning that those who then have expertise often move on, meaning the process must repeat itself.

Our ask is for sufficient APHA resource to manage the additional checks on plants and animals post-EU Exit from next July.

Designation of BCPs

This feeds into a wider opportunity and challenge long-term, beyond EU Exit. We understand and support increased capacity at BCPs at Heathrow overall, but not at the expense of the airport's ability to operate or the existing BCPs statutory requirements.

Any additional capacity that may be required post-EU Exit must be worked on strategically and with the airport. While we do not want to act as an enabler or blocker to any application, the airport operates within strict operational licensing and security constraints. Therefore, any BCP applications must go through this rigorous approach.

As such, it is only right that Heathrow is involved in the designation process in some form. We believe that DEFRA and Government, when considering new capacity, should engage in an open dialogue with Heathrow and other ports to ensure that new BCPs are fit for purpose and operating within the standards set at the port, avoiding any race to the bottom.

Data concerns

There are historical and ongoing challenges to sourcing data on EU movements at airports specifically. Both the Government's UK Trade Info and APHA Traces service are limited in their EU-specific airport data pre-2021, as data was not required to be collected at airports on consignments before EU Exit.

This has quite clear impacts – it limits the ability of both the BCPs and Government agencies to accurately model and assess the impacts of extra checks on consignments, movements and time at ports. We understand that BCPs have previously requested any available data from Government to help with planning, but this has not been forthcoming or available. We would welcome any data and modelling assumptions for live animal and plant movements to be shared for use.

While BCPs have been able to share some of their data, this is different to those collected at other ports.

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