

APPENDIX A

BORDER CONTROL POST

PUBLIC PROTECTION SERVICE, ODPH



1. EXECUTIVE SUMMARY

1.1 The Border Target Operating Model sets out the Government's new approach to Safety and Security controls (applying to all imports), and Sanitary and Phytosanitary controls (applying to imports of live animals, germinal products, animal products, plants and plant products) at the border. All such imports must come through a designated Border Control Post (BCP).

1.2 Plymouth Port Health Authority (part of ODPH) is in the final stages of gaining designated BCP status at Millbay, however there are concerns about operating a resilient service on a full cost recovery basis due to the current low throughput of food freight.

2. BACKGROUND

2.1 From 30 April 2024, animal products, high risk food of non-animal origin and medium and high-risk plants and plant products must come into the UK through a port of entry with the relevant Border Control Post (BCP). If a port is no longer able to carry out checks on particular types of goods, traders will need to find an alternative route to import their goods into the country.

2.2 Previous discussions have confirmed that it is in the interest of Plymouth to have a designated BCP. The required facilities (which have been DEFRA funded) are almost complete and Plymouth PHA is on schedule to gain designated status ahead of April 30 2024.

2.3 However, the Border Target Operating Model (BTOM) is designed to achieve full cost recovery and Plymouth PHA will not be able to achieve this with current freight traffic.

2.4 Roles and responsibilities are still being discussed, but it is almost certain that Plymouth Port Health Authority will require the services of a fully qualified portal veterinarian to sign off the required checks and oversee physical inspections. Plymouth PHA already know that in order to fully cost recover enough in fees to pay for a vet and all other expenses, the charges will be prohibitively expensive. Brittany Ferries is the main freight customer and they have confirmed that they do not wish to pass any further costs on to their importers, meaning that freight traffic would be directed to the other Brittany Ferries ports. As Plymouth PHA cannot currently compete with other ports charging models, Plymouth PHA will almost certainly lose the freight traffic that the port currently sees, in direct contrast to Plymouth's aspirations as a Port.

2.5 Based on best available evidence, current estimates are that Plymouth PHA will be required to undertake approximately 150 remote documentary checks a year and perhaps one or two physical inspections at the BCP. Plymouth PHA must also deal robustly with anything unforeseen that appears at the port once the new regime begins.

2.6 Plymouth PHA are seeking approval to enter a short to medium term Service Level Agreement with City of London Port Health Authority to provide immediate resilience at the Border Control Post. Plymouth PHA believe that entering a Service Level Agreement with a larger port will ensure that Plymouth Port can continue to grow and attract more freight customers, whilst minimising BCP set up costs and demand on its existing team of food safety inspectors. Plymouth PHA have chosen London because it is a well-resourced port health authority at the forefront of all new developments.

2.7 Plymouth PHA have DEFRA grant funding until July 2024. This will be used to cover set up costs and SLA negotiation. In the proposed SLA model, London Port Health Authority would undertake all of the remote documentary checks, including all invoicing. Plymouth PHA anticipate 150

checks will be required (this is an insignificant number in relation to London PHA's 200,000 checks per year), therefore costs can be recouped easily by London, providing a competitive service for Plymouth customers.

2.8 Plymouth Port Health Officers would retain local control over the BCP, undertaking local verification checks, assisting with emergencies and dealing with the port operator locally to resolve any issues. The service would operate using Plymouth staff and London PHA procedures and templates. Plymouth PHA would also undertake the one or two physical checks required, signed off by the London PHA portal vet.

3. ALTERNATIVE OPTIONS

3.1 Alternative options would be:

- Plymouth doesn't have a designated Border Control Post. However, the facility is built and mainly ready, subject to procedures and staffing. If there is no BCP, all relevant freight would be diverted away from Plymouth
- Run the BCP at a significant loss to Plymouth City Council.

4. FINANCIAL IMPLICATIONS AND RISK

4.1 Under this arrangement there will be no costs to either Plymouth or London PHA – there will be a small income from London PHA to cover the local Plymouth PHA work. Plymouth PHA consider this as the best option for Plymouth in the short term, ensuring resilience, competence and good customer service at Plymouth Port in highly unpredictable circumstances.

4.2 Most of the food freight currently entering Plymouth will fall into the low and medium risk categories. It is likely that the most frequent freight carriers will benefit from the Trusted Trader scheme (currently in pilot), therefore there will be little demand for officers onsite. However, Plymouth offers a good route to Wales and the west side of England and may be a useful alternative to avoid delays at the short straits. Once the BCP is operational, Plymouth PHA believes that freight traffic will increase, especially if Plymouth offers a smooth, value for money service.

5. TIMESCALES

5.1 The designation inspection took place at Millbay on 22 February 2024.

5.2 Confirmation of proposals for staffing and procedures must be with the relevant stakeholders as part of the final application for designation by the end of March 2024.