

Chartered Institute of
Environmental Health



BREXIT Regulatory Research Group

BREXIT
REGULATORY
RESEARCH
GROUP

What is the BRRG?

Task and Finish group facilitated by **CIEH** to review workforce capacity to deliver import controls in respect of POAO and HRFNOAO at BCPs.

Purpose of the Group:

To make evidence based recommendations to government to ensure there is a competent, sustainable workforce available to deliver import (and potentially export controls) following **EU Exit**.

Objectives

- Explore alignment of OV duties with those of other qualified Food Competent Officers e.g. Environmental Health Practitioners (EHP's)
- Resolve capacity shortfalls for OCR controls and reduce industry disruption
- Bolster existing OV capacity using other suitably qualified, competent officers to deliver import controls, freeing up capacity to deliver export certification
- Ensure optimum use of food regulatory workforce, exploring opportunities for efficiencies
- Review officer/OV qualifications and training to deliver food controls at BCPs, make recommendations as appropriate to ensure a competent and sustainable workforce for the future- potential for bespoke qualification?
- Assist in building an evidence base for negotiating a new Veterinary Agreement with the EU

BRRG JOURNEY

SO FAR...

Association of Port Health Authorities MEMBERS SURVEY

Gathering support the campaign by conclusive evidence

Feb 2022

NI-GB forum presentation

Topic presented on NIGB Supply chain forum

Nov 2021

BRRG - Group was given a name - October 2021

Group was named BRRG- defining its purpose and direction

Oct. 2021

September 2022- Group formed

Basic findings, points of direction and desirable outcomes defined and introduced to group- as starting point for further discussion

Sep 2021

CIEH Port Health Coffee and Catch Up -16/9/2021

Topic touched again, members poll expressed 100% support to create group focusing on OV capacity issue solutions

Sep 2021

Informal discussions/meet ups Aug/Sep 2021

Some key concept and ideas for solution introduced to CIEH

August 2021

Informal CIEH meetings June/July 2021

Informal talks about OV capacity issues, OV and capacity issues mentioned on CIEH Coffee Port Health Catch up 8/7/2021.

June/ July 2021

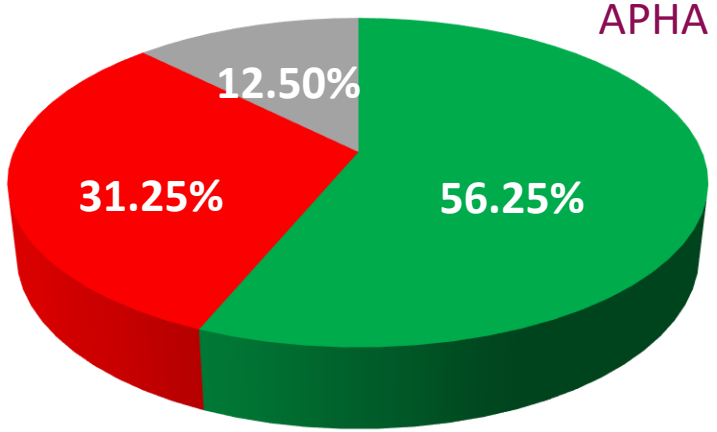
Achievements

- Political interest
- Industry support
- APHA (Association of Port Health Authorities) – CIEH Collaboration
- FSA support in principle
- Fed into Cabinet Office review of Border Controls and 2025 Vision

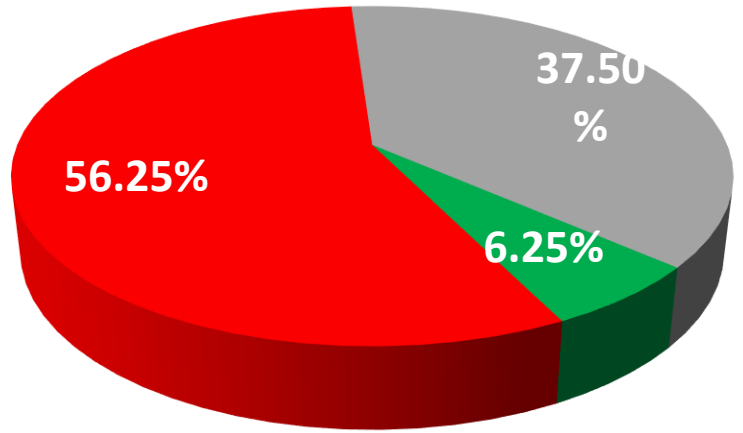
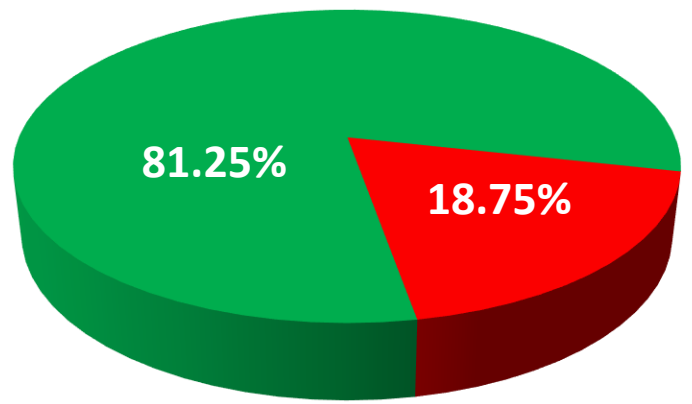
YES NO N/A

APHA Members Feedback

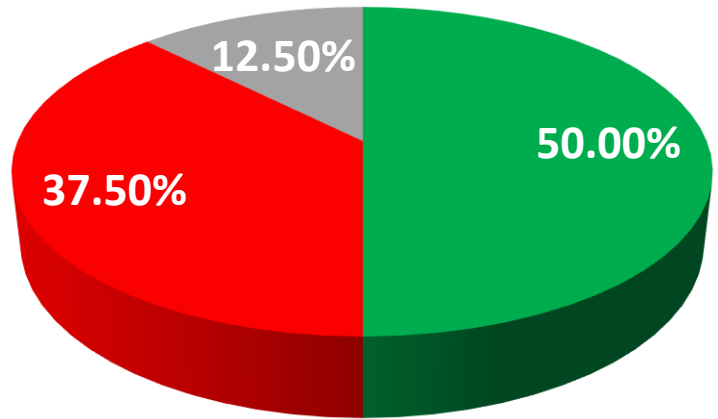
1 Is the Official Veterinarian shortage **likely to adversely affect your business?**



4 Are difficulties recruiting EH/Food competent officers likely to adversely affect your business?

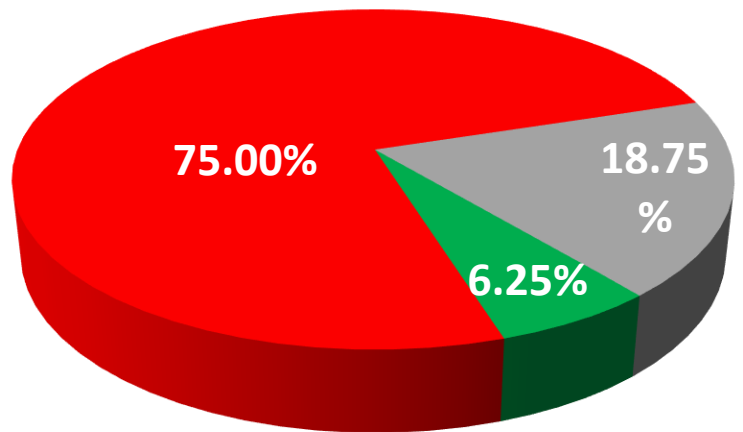


2 Is the UK education program/system adequate to **meet OV capacity requirements?**

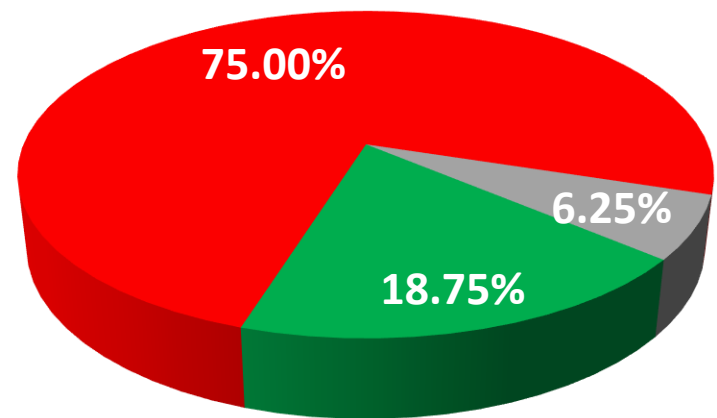


5 EH /Food competent officer capacity- It is easier to recruit EH/Food competent officers than to recruit Official Veterinarians

3 Do you think - **The supply of OVs for UK BCP SPS work is sustainable or on a recovery path?**

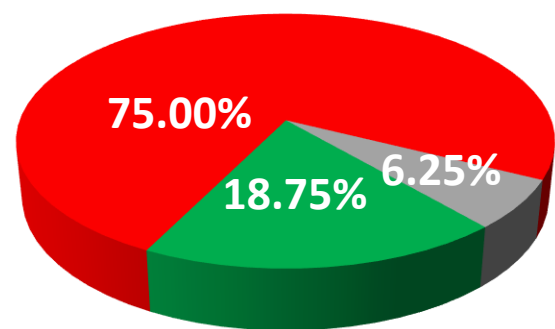


6 Is the UK education program/system adequate to meet EH/Food competent officer capacity requirements?



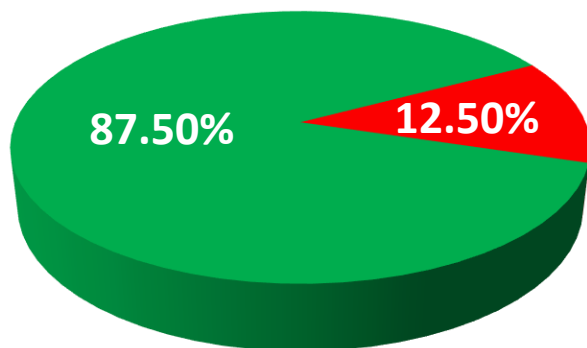
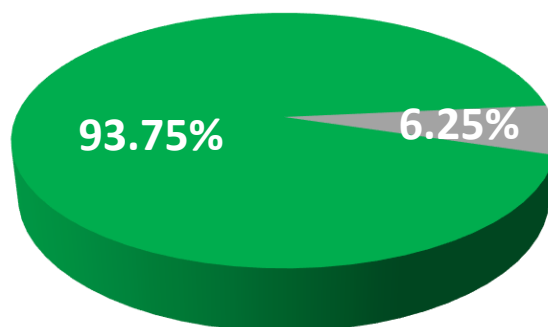
YES NO N/A

APHA Members Feedback



7 Do you think the **supply of EH/Food competent officers for UK official controls work** is sustainable or on a recovery path?:

8 If EH /Food Competent officers could perform POAO SPS imported food checks, **would you consider this recruitment option?**

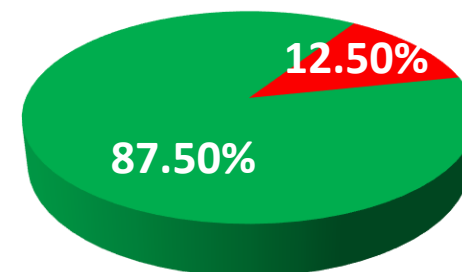


12 Would you support a **campaign to enable EH/Food competent officers to be authorised to carry out SPS checks.**



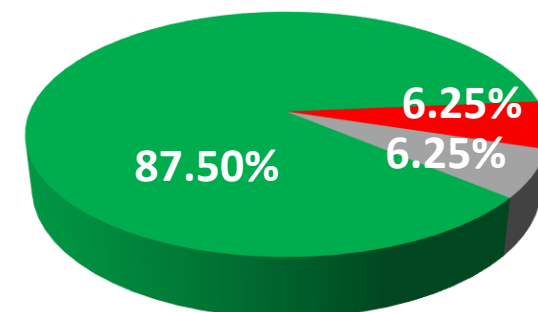
9 Would you support **the development of a dedicated qualification** (Standalone or EH Bolt-on) to ensure a sustainable workforce to deliver import controls on POAO in the future?

10 Should such a qualification (program development and student fees) be **Government funded?**



11 Do you agree, that effective **mapping of syllabi across educational programs** could identify further capacity to expand the workforce and ease the delivery of official controls (i.e. think of food technologists, microbiologists, EH, medical staff)

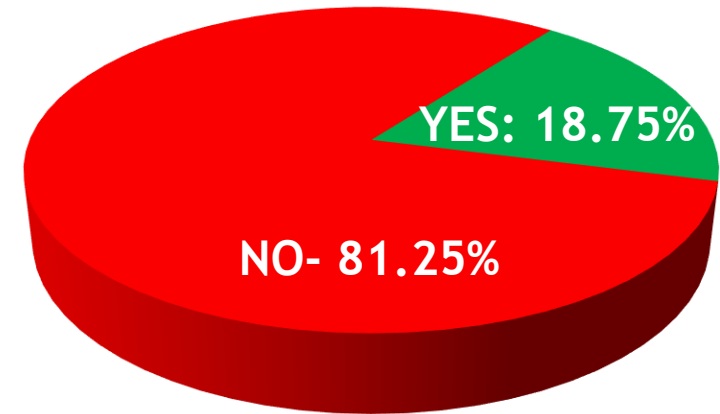
13 Do you think it would be of benefit to industry and UK taxpayers if a sustainable long-term solution could be introduced- so **SPS checks are delivered by staff qualified in the UK?**



APHA (Association of Port Health Authorities)

Members Feedback

Are you clear about the number of staff you will require from 1/7/2022? If NO, please outline what are the barriers to forecast:



"We have received limited data on the expected volume of consignments coming through our ports, therefore cannot make an accurate estimate of staff required"

"HMRC data does not indicate where the product is landed just where cleared so it is not completely accurate"

"Discrepancy between our data, IPAFFS IMP data and Defra's Customs data. We are working on our data as it matches IMP data, and broadly the same as previous projects undertaken"

"Lack of data to substantiate assumed figures of predicted EU products that will be subject to checks so staffing resources is based on speculation"

"All based on HMRC estimates at present"

"Acute Financial shortfall - lack of central Defra funding from 1 April 2022 onwards. Means I probably cannot recruit further essential staff and train them in time for 1 July. Urgently awaiting Defra response!"

"Significant uncertainties around pre-notification times, volume of POAO and HFNAO, no data on organics and limited data on IUU"

"We are as clear as we can be given our predicted EU imports. Assuming the numbers are correct we will have enough staff to cover the Port Health function"

Headlines

- Data available is not robust enough to forecast recruitment needs
- Supply of OV and EH- neither education system is currently fit for purpose to satisfy staffing demands for official controls
- Education and qualification system isn't currently fit to meet demand
- Legislation and FLCoP does not exclude other professions, as definition of *suitably trained* is broad - open to interpretation.
- Qualifications, competencies, skills- open to wider cohorts of suitable candidates
- Need for dynamic approach of SPS checks and border controls as a whole
- CIEH and others have a chance to make a positive change

Thank you for listening

- Comprehensive review is overdue, we must act now.
- Workforce crisis cannot be solved by any one organisation working in isolation.
- Opportunity for Government, employers, professional bodies and academia to collaborate to protect public health and support businesses

Thank you goes to colleagues from BRRG team for the support, time and ideas. Thank you to colleagues from Association of Port Health Authorities who helped with their feedback to shape the survey.

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BRRG **CONTACT FORM** (Questions, enquiries, suggestions)

