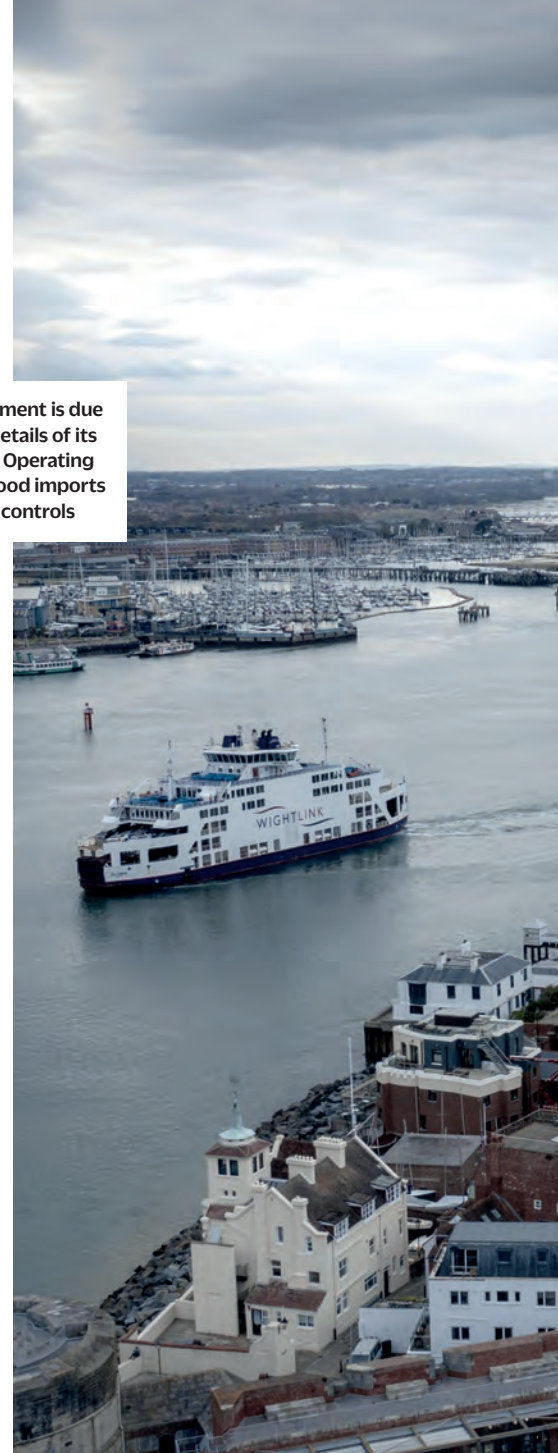




The government is due to release details of its new Target Operating Model for food imports and border controls



MORE CHANGE FOR UK PORTS

Why EH should be instrumental in shaping the new Target Operating Model for food imports

WORDS BY NIC PATON

BACK IN JUNE, *EHN* highlighted how then minister for Brexit opportunities Jacob Rees-Mogg's decision to scrap planned checks on food imports from the European Union had created significant upheaval and an extra burden for environmental health ('Playing politics with food safety', vol 37 issue 4).

Since then, of course, to use Prime Minister Harold Macmillan's famous turn of phrase, 'events' in the form of a long Tory leadership campaign, a new government, a cost of living crisis and the death of The Queen, have somewhat

conspired to disrupt the normal course of government business.

Nevertheless, environmental health officers are still anticipating the publication this autumn of a significant update to the government's thinking around food imports and border controls in the form of a new Target Operating Model (TOM).

The model, which is being worked up by the Cabinet Office, will be the foundation for a new food import checks regime that is set to be introduced towards the end of 2023.

There has, naturally, been a lot of conjecture as to what the TOM will contain, concedes Tony Baldock, director

of health and wellbeing at Ashford Borough Council, who has been working with the government on its plans.

"The broad headline is that 100% documentary checks of everything being imported will no longer be needed. This is in connection with the 'Border 2025' visions for all freight – world freight, not just EU – so that is a big change," he tells *EHN*.

"I think this is a sensible approach. It will be very much modelled on things that exist in the finance world, in other words, so-called 'ecosystems of trust'. Such systems look at the consignee, the consignor and the haulier, and rate this trusted relationship, and therefore allow

IN NUMBERS

£48bn

Estimated value of food, feed and drink imported into the UK in 2019

£10.5bn

Estimated value of fruit and vegetable imports to the UK from the EU in 2021, with drinks adding a further £6.2bn

£1bn

Amount then Brexit opportunities minister Jacob Rees-Mogg in April suggested would be saved annually by delaying planned changes to EU food import checks

£450m

Amount of taxpayers' money spent on new border control posts, now unwanted because of the government's U-turn, according to the British Ports Association

a more targeted approach to inspection based on intelligence and risk. This model will also consider the kind of goods being imported so it will be proportionate."

'TRUSTED TRADER' MODEL

The plans are ambitious, especially in the timeframe, but the broad direction of travel is good, and the government's overall vision and thinking is positive, Baldock argues. "If we are fully plugged into the model, and businesses are fully plugged into the model, it could work," he says, adding that Ashford has been working with one of the Cabinet Office pilot projects on how a future 'trusted trader' model might work in practice.

"The mood music is all around segmenting checks into low, medium and high risk"

The government's approach also broadly chimes with feedback from industry to government gleaned at workshops on the TOM held over the summer, highlights environmental health practitioner and consultant Helen Buckingham.

Buckingham was until the end of last year interim head of environmental services and port health at East Suffolk Council, home to the Port of Felixstowe

and is also lead author and trainer for the CIEH and the Food Standards Agency on imported food controls.

"The mood music is all around segmenting checks into low, medium and high risk; a very simple traffic light scheme, with low-risk checks essentially dropping out," Buckingham points out. "So, low-risk goods of plants or animals won't need any checks or documentation. High-risk checks on live animals and the highest-risk products will, of course, need everything. The crux, then, is what does 'medium risk' mean?"

If the TOM model does end up being based around a trusted trader approach, one key question is what any accreditation



Above: Mike Sellers, director of Portsmouth International Port. Right: Portsmouth BCP

process will look like, she points out. Equally, how will already over-burdened inland EH professionals be expected to pick up anything missed at the border?

“One of our biggest fears, in terms of risk to public and animal health, is the prevalence of the ‘white van man’ bringing goods into GB without being subjected to the appropriate level of checks,” Buckingham says.

“Anecdotally, this has been on the increase since the EU exit properly took effect and it’s one of our biggest threats in the future. The much anticipated trusted trader scheme must be structured properly to mitigate such risks,” she adds.

EXPENSIVE ‘WHITE ELEPHANTS’

A further big question mark in all this is where any new model will leave the vastly expensive border control posts (BCPs) that were built – and staffed up – by many ports around the country in anticipation of July’s checks, and have now ended up being mothballed or sitting idle.

The British Ports Association (BPA), for one, has calculated that at least £450m of taxpayers’ money has been spent on these now mostly unwanted new facilities. This includes an estimated £250m on building a number of inland border facilities.

As BPA chief executive Richard Ballantyne said in April, at the time of the Rees-Mogg U-turn: “Many UK port operators have built border control posts in preparation for post-Brexit checks and all were due to be ready. This announcement is a major policy change, meaning the facilities will effectively become white elephants, wasting millions of pounds of public and private funding, not to mention the huge effort there has been to get things ready in time.”

Baldock concedes the sudden about-turn by the government did create headaches



ROLE FOR CIEH

Seizing the opportunity

“Although we don’t yet know what will be in the Target Operating Model, EH needs to ensure government recognises the skills it can offer. We’re working with members through the Border Regulatory Reform Group (BRRG) to ensure the voice of EH is heard,” Kate Thompson, CEIH director Wales tells *EHN*.

“Too often our food safety system is taking people – OVs especially – away from other countries which also need them. I hope we can use this as an opportunity to develop a better system where we grow our own.

“There will be a lot of people on EH or food career pathways within the new border control posts who are now uncertain about their future. We need to ensure they do not leave the profession. If they don’t secure a job at one of the BCPs, we need to encourage them to stay in the profession and help us with the challenges we face.”



for port operators. Some BCP roles will probably be lost to redundancy, most likely in business process administration, although not, he emphasises, frontline EH positions. The government has also been mindful in its ongoing planning of the need to be using these new BCPs and their staff in the best way possible going forward, he adds.

“I really feel for the new BCPs and those which have expanded in preparation for additional checks,” says Buckingham.

“I have met a lot of people recruited into these positions, often from a diverse range of operational backgrounds, such as from cruise ships. A huge proportion have come in from outside the profession and have worked so hard for months, or even years, to get to grips with the language and procedures involved in imported food checks, waiting for the big July 2022 switch on.

“Some of them have decided to leave their roles already, and who can blame them? It’s such a shame to see much-needed talent in our profession leaving so soon,” she adds.

For Mike Sellers, director of Portsmouth International Port, while he agrees the new



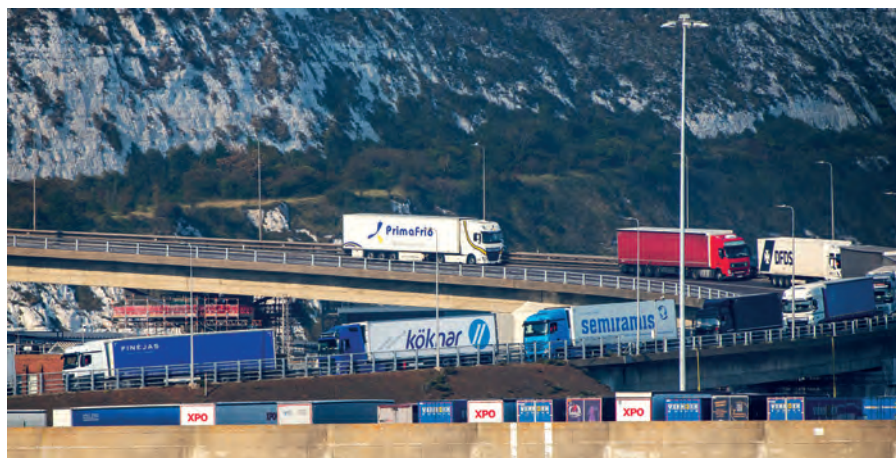
“There’s never been a better time to rewrite the rules and influence what comes next”

TOM could be positive in the longer term, the confusion, lack of clarity and costs incurred by ports – some £25m in Portsmouth’s case – have left something of a bad taste in the mouth.

“What’s not good enough is the fact that we spent two years putting in infrastructure and getting prepared for the border operating model and what was going to happen for that,” he tells *EHN*.

“We are contractually obliged, because two-thirds of our costs are coming from government funding. But we’re under a grant-funded agreement that for the next five years prevents us from doing anything else with that facility,” he explains.

“We built an exceptionally large piece of infrastructure based on the design that the government wanted us to build. It has three bays for the current high-risk products, meat products and products of animal origin (POAO), with a number of freezer chambers behind that. And we’ve got 10



UK trucks queue to enter the Port of Dover

bays for plant-based goods, with lots of refrigerators and ambient storage behind them. And then one for the forest products.

“We’ve delivered what the government wanted us to deliver under a contract, and we are left with a running cost. We’re a local authority port, so we don’t have private shareholders who can help subsidise that shortfall, which is in excess of £7m.

“On top of that there is the cost of the energy too at the moment – bearing in mind these have freezers and refrigerators. So the cost of running the facility is exceptionally high, and all of those costs are increasing,” Sellers adds.

ENTERING THE DISCUSSION

For both Baldock and Buckingham, there are also wider conversations – and opportunities if the government is willing to consider them – for EH that potentially could emerge from the new TOM.

“I think the government is missing an opportunity, even in the Target Operating Model, to say, ‘Do we really need veterinarians to be doing inspections on post-mortem things?’” says Baldock.

“We know there is the public health risk and zoonotic risk, but we are interchangeable with veterinarians. In the British model, EHOs will always plug into those gaps. The need for lots of official veterinarians (OVs) is foolish; it is an expensive business and it robs the continent of all their OVs. Almost every OV I have ever met was either Spanish, Romanian or Polish, and that can’t be right.”

“There’s never been a better time to rewrite the rule book and influence what comes next,” agrees Buckingham. “So, my wish is that we find a way to use our skilled EH resources to do more POAO work, in preference to relying so much on checks by vets, which we’ve been bound by EU rules to do all this time.”

Finally, and chiming with CIEH’s ambitions to get EH more firmly on the new Truss administration’s radar, as discussed in this edition from page 8, there is an opportunity in all this activity and new thinking for EH to be making its voice heard much more loudly around the government table.

“The bar on checks has to be properly thought through and our voices as professionals, as BCPs and port health authorities have to be a much bigger part of it. I call on CIEH and the Association of Port Health Authorities to ensure they are right in the thick of the conversations, bringing the right people to the table,” says Buckingham.

“We play an important role in this space and we should be taking notice,” agrees Baldock. “We need to be a bit more vocal and lobby a bit more. Our specialism is our generalism and that’s the message the profession needs to stand up and be very proud of. We don’t do ourselves justice too often.”

NEED TO KNOW

- A new Target Operating Model for food imports is expected this autumn, after the government’s U-turn over changes to EU imports in the spring.
- It will be the foundation for a new food import checks regime from the end of 2023.
- The likelihood is it will be based on a ‘trusted trader’ model and will cover all freight, not just the EU.
- The fate of now-mothballed border control posts – and their hundreds of employees – is uncertain.
- Environmental health must maximise its role in the new model.