



**BORDER
REFORM
RESEARCH
GROUP**

Chartered Institute of
Environmental Health



The Association of
Port Health
Authorities

SUMMARY REPORT

THE BCP PREPAREDNESS SURVEY

*Conducted collaboratively by **BRRG** and Association of Port Health Authorities, exploring various aspects of BCP preparedness for checks of imported food from EU as originally scheduled from 1st July 2022.*



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Meet the BRRG

Border Reform Research Group (BRRG) is a task-and-finish group facilitated by the CIEH.

The **current focus** is a review of controls applied to imports and exports of products of animal origin arriving from the EU and the rest of the world (RoW). The aim is to ensure, that the public health and animal health are protected- using suitable highly skilled professionals.

The survey -Goals and Objectives

THE **BCP PREPAREDNESS SURVEY** was conducted in **February and March 2022** in collaboration with BRRG and the Association of Port Health Authorities.

In response to current staffing challenges and to ensure a sustainable workforce for the benefit of UK and international trade, the CIEH in association with the newly established BRRG conducted a survey to obtain insights into staffing at BCPs and elicit views about the potential for a wider range of officers to undertake official controls of products of animal origin- currently restricted for delivery by OV's.

This report and further initiatives do provide a conclusive dataset to support our views and to assist Port Health Authorities, Businesses, professional bodies, and other relevant stakeholders in their lobbying activities.

The **key objective of this report** was to authentically capture the current level of preparedness for checks and highlight the common concerns held in connection with starting the EU SPS checks from 1st July 2022.

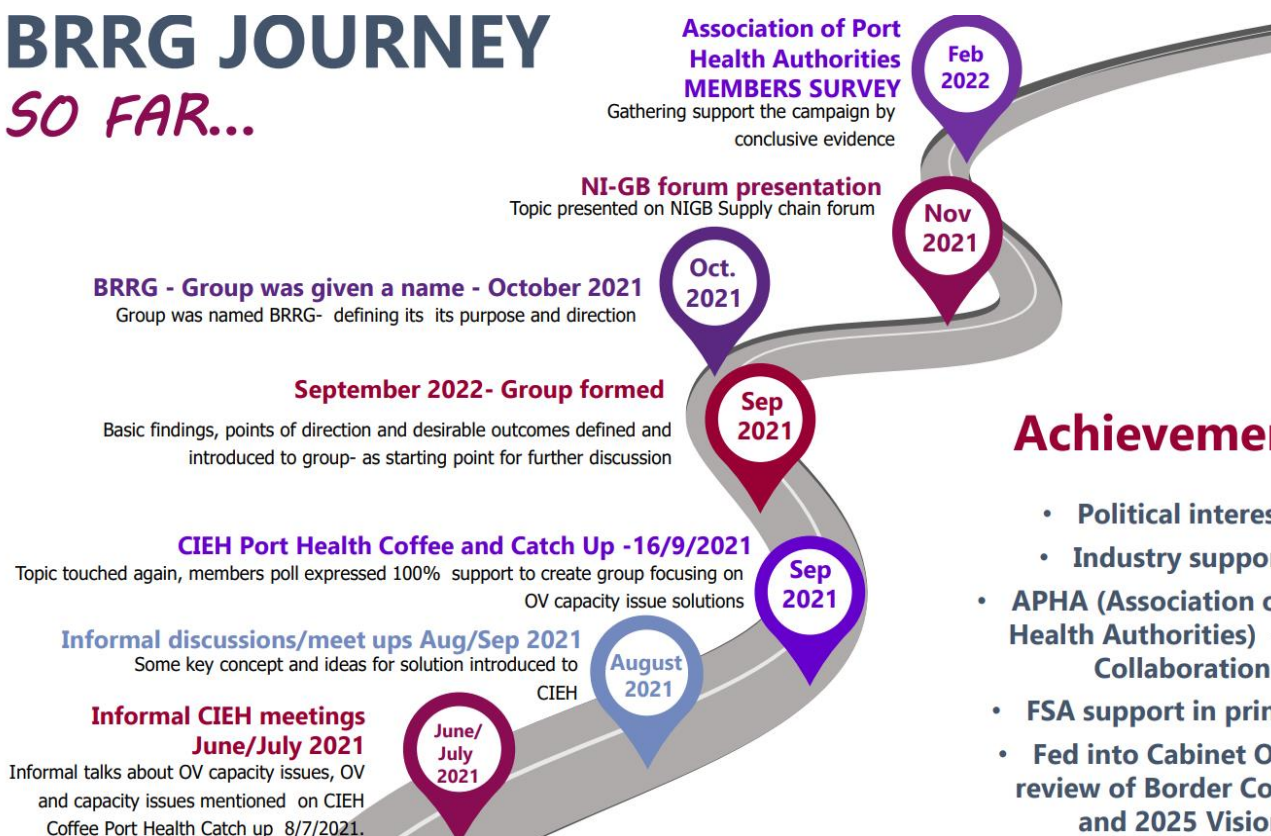
The key learning, uncertainties, and lessons learned remain relevant despite the government announcement on 28/4/2022 concerning further delays. Questions were aimed to identify key concerns related to the recruitment of authorized officers, OV's, overall staff capacity planning, and related topics.

Concerns identified were highlighted and dated back to 2016 in many cases, but remain valid - unresolved, and un-actioned.

Staffing capacity issues represent the potential of the adverse impact on food safety, food standards, disruption to smooth run of food supply chain, increased cost of recruited OV driven by the supply & demand changes etc.

Enabling EHPs and food safety officers to deliver SPS checks would ease the OV capacity shortage, but also

BRRG JOURNEY SO FAR...



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

potentially optimise operation. (i.e versatile use of the Environmental health for other local authority functions).

Capacity issues will remain **potentially** detrimental to nations' food safety, security, supply chain, and other potential disruption to food operation- until these are solved, questions reliably answered & solutions known, planned for and implemented.

The further deferral of checks could assist the key stakeholders finding solutions and closing the gaps in process and policy.

This report provides information to assist Port Health Authorities, businesses, and other relevant stakeholders in resolving numerous issues that remain yet to be solved.

Key facts about the survey

The Audience

We approached 32 colleagues from BCP's across the UK

We received 20 responses. Some responses were however completed only very partially. Response % are based on a number of responses received for that specific question. Sixteen responses were completed satisfactorily (considering the level of completion).

Not all questions were mandatory, as we understand that respondents might wish not to share some information.

It is recognized, that n=16 isn't a substantial size of the sampled population, but the consistency of responses indicates that issues were widely shared.

Software Used

Quantitative analysis: **Qualtrics XM**, MS Excel,

Qualitative analysis: <https://monkeylearn.com/word-cloud>

Data collection: Qualtrics XM

Results presentation: Quantitative results were compared with the number of responses for a specific question to maintain data integrity of reported results (not all questions were answered by participants).

Presentation of findings

Qualitative Analysis

Basic rules of the **thematic analysis** were used when collating and analysing the responses.

Key topics and areas were collated and summarised in thematic areas - as they were common across a number of respondents. This indicated that concerns are common and shared- therefore not isolated.

The qualitative (written) responses were aligned with the results of quantitative analysis.



Quantitative Analysis

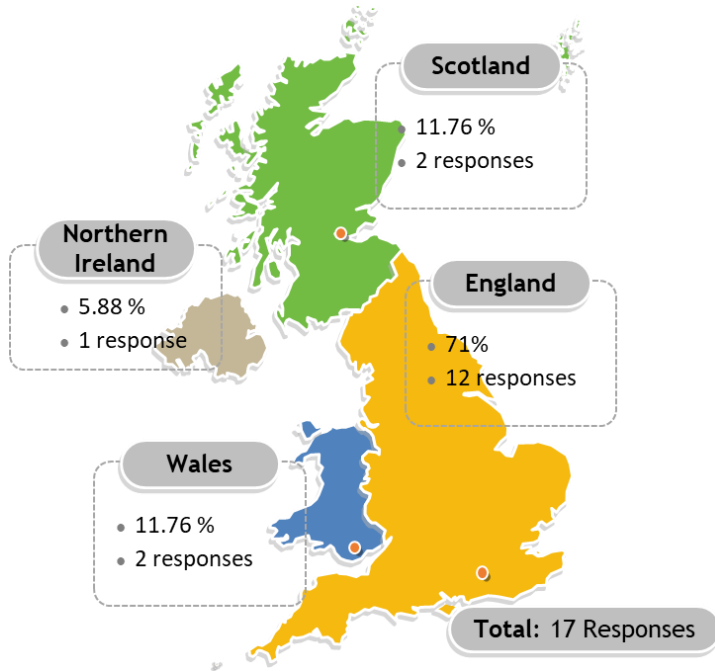
Responses were collected and checked for completion.

The key topics were analysed and presented in form of charts and tables (where relevant). The % representation and the number of respondents were presented alongside the results - so reviewers are provided with information about file size.

Summary of findings

Location of respondents:

From 32 participants, 17 shared their location.



17 participants- shared the stage of BCP completion and the type of operation:

BCP	%	n
BCP under construction	23.53%	4
Operational BCP	23.53%	4
Other- please specify	29.41%	5*
Operational Multiple BCPs	5.88%	1
Under construction multiple BCPs	11.76%	2
Port health authority with no BCP (existing or under constructions)	5.88%	1
Total	100%	17

Other*:

BCP awaiting planning approval ►multiple operational BCPs and multiple sites under construction. ► New BCP Constructed - Designation pending ►PHA with historic BCP that could be reinstated should demand require.

Product type and commodities related questions

We asked our respondents questions about the commodities and product types their BCPs are likely to handle in the future or are passing through already. This was in order to establish the significance of OV and EH capacity at BCPs. In conclusion, the OV and EH capacity issues are relevant to BCP operations.

The key objective of the study was however to explore the issues associated with the staffing process.

The survey brought a great opportunity to examine issues related to the recruitment of professional personnel- EH/Food competent officers and OVs.

Results concluded, that out of **16 responses**, **13 (81.25%)** BCP isn't sure about their recruitment needs, as opposed to **3 (18.75%)** who are clear on their staffing requirements.

The key reasons for uncertainty were a lack of conclusive data and reassurance about the process.



Key findings:

Even though there is another deferral in place- we should use the experience and support our BCPs - therefore our imports and logistics business to ensure, that the officials' shortage is not going to be detrimental to the supply chain and its smooth operation.

Quantitative Analysis

The following sets of questions were designed to examine the concerns, views, and opinions of BCP representatives.

16 participants contributed with responses to this block of questions.

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

YES	56.25%	NO	31.25%	N/A	12.50%
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2. Is the UK education program/system adequate to meet OV capacity requirements?

YES	6.25%	NO	56.25%	N/A	37.50%
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3. Do you think - The supply of OVs for UK BCP SPS work is sustainable or on a recovery path?

YES	6.25%	NO	75.00%	N/A	18.75%
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4. Are difficulties recruiting EH/Food competent officers likely to adversely affect your business?

YES	81.25%	NO	18.75%	N/A	0.00%
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5. EH /Food competent officer capacity- It is easier to recruit EH/Food competent officers than to recruit Official Veterinarians

YES	50.00%	NO	37.50%	N/A	12.50%
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6. Is the UK education program/system adequate to meet EH/Food competent officer capacity requirements?

YES	18.75%	NO	75.00%	N/A	6.25%
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7. Do you think the supply of EH/Food competent officers for UK official controls work is sustainable or on a recovery path?

YES	18.75%	NO	75.00%	N/A	6.25%
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8. If EH /Food Competent officers could perform POAO SPS imported food checks, would you consider this recruitment option?

YES	93.75%	NO	0.00%	N/A	6.25%
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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?

YES	100.00%	NO	0.00%	N/A	0.00%
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10. Should such a qualification (program development and student fees) be Government funded?

YES	100.00%	NO	0.00%	N/A	0.00%
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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

YES	87.50%	NO	12.50%	N/A	0.00%
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12. Would you support a campaign to enable EH/Food competent officers to be authorised to carry out SPS checks.

YES	87.50%	NO	12.50%	N/A	0.00%
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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

YES	87.50%	NO	6.25%	N/A	6.25%
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Key findings:

- **The unavailability of qualified personnel is a critical long-term issue (OV, EH, Qualified food officers)**
- **There is currently no adequate UK recovery process in place to remedy the shortage of OVs supply-readily available to conduct SPS checks & official controls**
- **Training and qualification system would benefit from a new tailored program (standalone/bolt-on etc.) to address the issue for the future. Fees and program development should be government funded.**
- **Staff shortages of authorised officers (EH, OV) have potentially adverse impact on port operation and businesses.**
- **Use of EH for SPS checks (if that would be an option) would be welcomed**

Deferral of SPS checks needs to be utilized to prepare processes, resources, and approaches to SPS checks- therefore biosecurity, food safety, and security & public health. The circumstances might change- good standards should remain.



Qualitative analysis

Qualitative analysis captured comments and views that our respondents shared with us.

These were analyzed and collated by the leading topic, identifying key points:

The outline of comments echoes common topics represented in the port health community.



Key findings:

- *The use of OV's and EH to deal with food safety matters would result in increased efficiency, substantial savings, etc.*
- *Modern borders should be based on competency and risk-based approach rather than titles*
- *Need for a specific port health competency matrix*
- *Recently qualified EH do not have sufficient practical meat controls experience*
- *Will take a long time to supply a sufficient amount of EH to meet the demand*
- *Current staffing solutions result in hiring overly priced OV's as a result of the OV shortage*
- *UK veterinary programs- do they prepare sufficiently?*
- *The topic was discussed in past, SPS checks were done by EH in past without issues- this was suggested after 2016- an opportunity missed?*
- *No EH or vet degree cover sufficiently imported food contest. A more radical pragmatic approach is needed, promoting career pathways, etc.*
- *Open to wider professions with suitable skills*
- *Review of policy needed to establish current position and what needs to be done*

Expert's voice:

"Difficulty in obtaining OV cover could be mitigated by allowing EHOs/TSOs to carry out some of the work currently reserved for an OV. Additional training requirements will be minimal"

"The Food Law CoP amendment was welcome and enabled us to recruit non-EHPs to assist OV/OFI's in the checks - but I would have preferred more EHPs - but there are not enough available or willing. The low risks associated with EU SPS goods are not the same as RoW (which we don't have). I remain of my original opinion that post-Brexit UK legislation should have looked at a more practical, pragmatic and sustainable model for EU-GB SPS checking by those best placed to do it. Maybe it's just another missed opportunity"

"The Port Health Authority of the future will require a mixed set of competencies, based around the trade and requirements at their BCP. They will want flexibility and the ability to deploy staff with the relevant competency to do a task - not staff with a specific qualification. The fundamental change required is to remove the specific qualification requirement - and accept any relevant degree level qualification - this will open up the market place to entrants into Port Health. There then needs to be a specific port health competency matrix - where by individuals can the competency and subsequent authorization to undertake specific tasks. The competency matrix should be contributed to by all relevant bodies."

"Due to time constraints and shortage of EHPs we have had to engage with an OV agency to secure the capacity required. This is a very expensive option and will add significantly to our charges levied on importers."

"Immediately after Brexit (2016) I suggested to Defra that there may be an opportunity for UK to "go its own way" and dispense with OV requirement for EU SPS checks and train up EHPs to do this specialist work (as we did very successfully pre-EU many years ago). I find it rather ironic and disappointing to find that the same questions are being asked now, only a few months before the checks start on 1 July."

"OV and EH should be an inter-changeable equivalent role in UK and EU when dealing with food issues this would not only allow more local control and improve imports and exports but also a big step forwards for others such as the FSA in dealing with meat hygiene improving accountability, performance, sustainable workforce, and very worthwhile cash savings"

"The watering down of the FLCoP means that the EH qualification is no longer considered as valuable or worthwhile as it was previously. CIEH need to promote the profession more not encourage a change to what a "food competent officer" is"

"The solution required is far more radical - it requires a fundamental reassessment of the skill sets and competencies required at the border. Neither the degree in Veterinary Science nor the Environmental Health degree have any meaningful content related to Import /Border controls. As the UK moves forward outside of the EU, import and border controls will become significantly more important. However, in the current model of OVS/EHPS the costs associated with operating that border will rise disproportionately. This will ultimately lead to compromised biosecurity. "

"The terminology of OV / EHP or PHO should be related to history - and new inclusive job title and role developed. With this job role is supported by the competency matrix. Obviously not all individuals will have all competencies - and this is the point. This mechanism will provide a career pathway - so individuals can see how they can develop their port health career. Moreover, it will allow PHAs to undertake competency or training gap analysis, to target future issues. It will support a dynamic approach to service delivery and facilitate demand lead resourcing. All of which will lead to an effective and efficient port health service. And contribute to the HMG Border Strategy 2025 - of a world class border. "

Future priorities

Competency system for delivery of official controls - proposal for review of qualification process enabling UK to staff their statutory posts without reaching out to international job markets (international staff resources should therefore become an option and convenience instead of the “only option” and “the necessity”)

Grow of the profession -promote collaborative working, explore options of new dedicated qualification. Review existing competency and qualification system to facilitate access to relevant entrants from other industries and professions

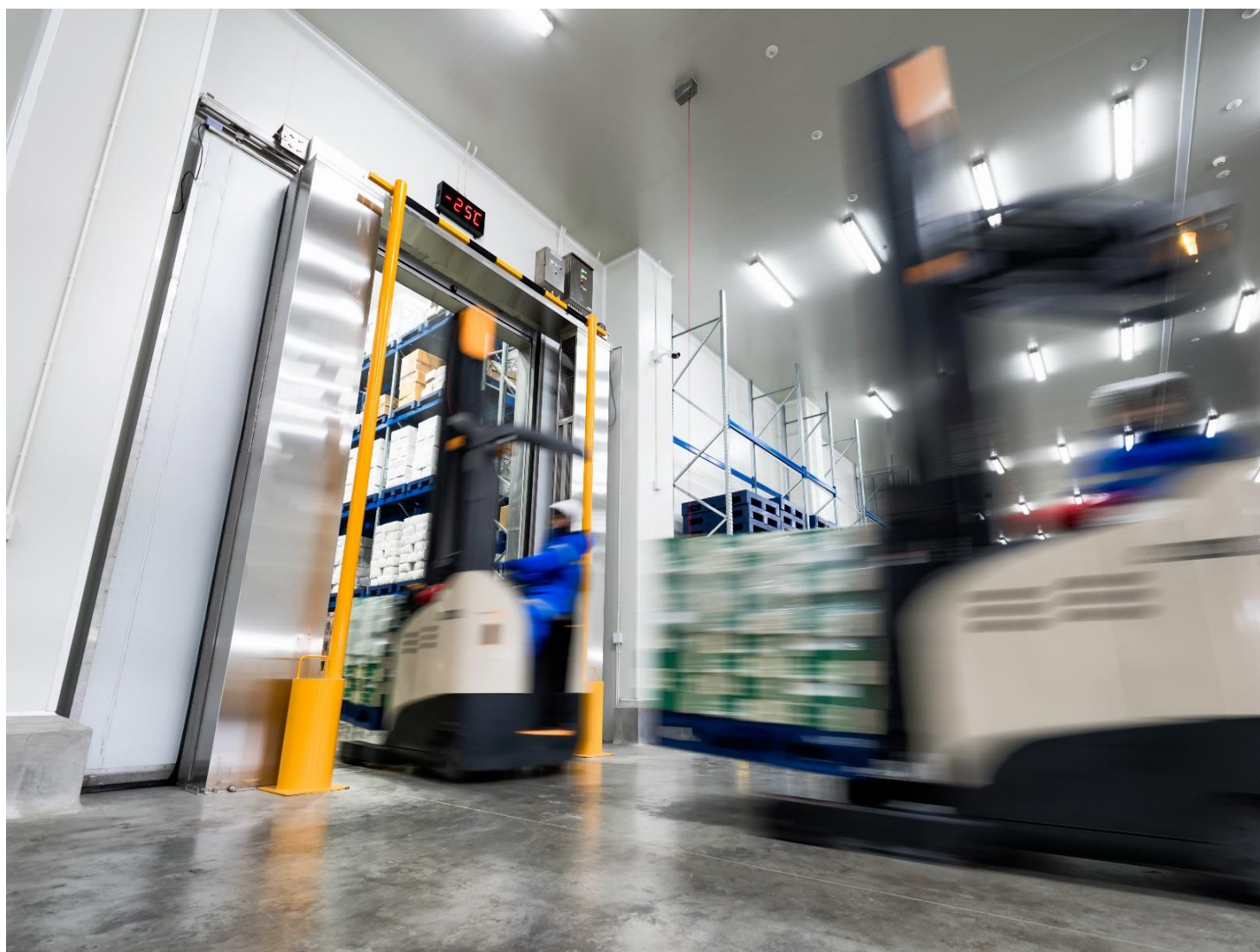
Core principles of SPS checks and health protection need to be further voiced and promoted -aim to assist government in delivery of informed decisions.

Assist government in accessing easy to understand and interpret information -relevant to food safety and

security- this way help in protecting supply chain, biosecurity and core principles of public health.

Increased awareness in areas of **public health. Wider context, complex implications**- in connection to food imports and associated official controls.

Wider implications of Check free borders introduced (tolerability of risk, cost-benefit considerations, and examples of scenarios)- increase awareness in scale of priorities.



Next steps

Thorough policy mapping - establish in detail the current standing and the opportunities arising from the current legislative environment. Identify necessary and desirable changes to legislation & implementing policies. Share findings and promote dialogue.

Revive tested approaches and strategies - give them new risk-based meaning - in the interest of (not only) the UK population of 21st century (and beyond)

Relearn to apply core tested principles and approaches such as “Nudge- push- shove”, “Engage-enforce-educate” - share these with wider audiences.

Key stakeholder proactive engagement- tailored, targeted, effective- clear goals and objectives, follow-up, informed qualified representation of the initiative, engagement meetings follow up etc.



Contact & response form



Web:

<https://brrg.org.uk>

Authors:

Diana Tumova
Diana.tumova35@gmail.com

Kate Thompson
k.thompson@cieh.org

Anthony Baldock
Anthony.Baldock@ashford.gov.uk

Report and technical enquiries:

Diana Tumova
Diana.tumova35@gmail.com

Other BRRG pblications:

[Written evidence](#)- Revocation and reform Bill 2022