

City Corporation Brexit Key Principles for the Port Health and Public Protection Division

The City of London Corporation has agreed the following key principles that will form the basis of its negotiations with government and relevant agencies concerning the functions undertaken by its Port Health and Public Protection Division:

- 1. The same, or an improved, level of consumer protection should be sought for public, animal and environmental health in terms of any proposed changes to regulatory controls after the UK leaves the EU.**

The current UK regulatory regime that covers a wide range of public, animal and environmental protection matters, including those goods that enter and leave the UK as imports and exports via our seaports and airports, complies with agreed EU wide and/or international standards, controls and enforcement protocols. This provides the UK with a reputation on an international/global platform as a country whose products meet the highest standards of quality, safety and integrity (that includes traceability) which is a very important USP for current and future trade for the UK.

- 2. Any changes to the current legislation should be commensurate with the risk posed by different activities and trades, as it is recognised that some enforcement requirements could be streamlined.**

Whilst opportunities exist to further refine and streamline the current regulatory landscape in the UK, through the parliamentary process provided in the EU (Withdrawal Bill), this should not go back to the crude one in one/two out as has previously been the case. The above proposition is one that focuses and targets those imported products and associated trades and businesses that pose the highest risk to the health, safety and well-being of UK consumers, the wider public and the environment, and who fail to meet the required quality and safety standards imposed by UK regulatory controls.

- 3. The UK should continue to recognise EU controls in order to avoid resourcing implications at the UK border; and this would best be done as part of a reciprocal agreement with mutual recognition, as this would be more sustainable politically, promote regulatory alignment, and facilitate UK-EU trade.**

Without this in place the UK faces huge pressures to rapidly establish additional documentation checks, physical examinations, sampling and analysis, alongside major infrastructure works at ports of entry to facilitate this essential regulatory control work and ensure it can be effectively carried out. Analysis undertaken by the London Port Health Authority estimates for the Port of London, that if imported food and feed from the EU, that covers both products of animal origin and products of non-animal origin require inspection as currently is the case for third country imports,

there will be at least a 25% increase in work load for the London Port Authority at its Designated Ports of Entry and Border Inspection Posts. There could also be further increases in trade activity at the Port of London, as importers may decide to divert food and feed currently coming from the EU on roll on roll off vehicles through the Port of Dover to the Port of London, as importers are likely to experience potentially serious delays at Dover, as it currently has no Border Inspection Post facilities at the port.

In the event of a 'no deal' outcome there is likely to be a further increase in port health border inspections and examinations necessary for food and feed, if imports from third countries that are destined for the UK, but first enter an EU port e.g. Rotterdam, are no longer subjected to the current EU port health controls at that EU port of entry (as they are in transit), before being transported into the UK as a final destination. It is very difficult to determine what the scale of the increase will be as there is no specific data recorded for these particular shipping movements. However, it is understood that if the UK reverts to World Trade Organisation standards for imported food and related products, unless a Fair Trade Agreement is secured with the EU, the UK is legally obliged to undertake an inspection regime for EU imported food and feed (which is currently not required), as is now in place and carried out for other third countries.

There will also need to be a commensurate increase in the number of highly trained professional and technical port health specialists to ensure the necessary port health duties can be fully implemented.

4. Full cost recovery for local authorities and port health authorities to enforce relevant legislation is essential, and this should be extended to include those areas not already covered, particularly if they have to undertake additional controls as a result of Brexit.

This is imperative as the additional costs to secure, as far as is possible, the continuing efficient movement of goods through the ports and onto their final destinations, are likely to be very high. It should also not be overlooked that all Products of Animal Origin (PoAO), are required to enter the UK via a Designated Border Inspection Post and will require the sign off from an Official Veterinarian (or the equivalent post Brexit) that the PoAO meets the necessary UK regulatory standards. These are highly trained specialists, many of whom are EU citizens and are likely to be in high demand in the UK and the EU, which could further increase costs for this work.

These added costs should be charged by the Port Health Authority to the importers.

5. The current checks at UK and EU borders on third country imports should be maintained to facilitate free movement of goods within the EU, and between the EU and the UK, and the UK should maintain access to existing IT and rapid alert arrangements.

This has been covered in terms of free movement of goods above. However, the UK's access to existing IT infrastructure systems and related rapid alert systems for food and non-food products should not be underestimated. These systems provide critical and timely information, along with shared intelligence and networking across the UK and EU countries. Without systems such as RASFF – the Rapid Alert System for Food and Feed, TRACES – Trade Control and Expert System and CITES – the Convention on International Trade in Endangered Species of Fauna and Flora, the work of the LPHA, and in the City Corporation's role as Animal Health Authority for London, would be hugely compromised and the risk to public and animal health in the UK greatly increased. Furthermore, if the UK is not given access to these systems then there will be a need to develop its own, resulting in time delays, a loss of economies of scale, greater service inefficiencies and additional capital and running costs for the new systems.

- 6. To control public health and animal health risks effectively, and to prevent the potential spread of zoonosis (a disease which can be transmitted to humans from animals), monitoring, checks and controls on high risk food, feed and animals should be undertaken at first point of entry into the UK, i.e. at its borders.**

This is seen by the City of London Corporation in both its role as the London Port Health Authority and as the Animal Health Authority for London as critical to the efficiency and effectiveness of the services it provides and its ability to significantly reduce the risk caused by poor standards of safety and quality from food and feed, and the spread of zoonotic diseases.

The infrastructure and expertise required for physical inspection and examination of goods should be as close to the port of entry as is reasonably possible. Facilities at or close to the port of entry can be designed in a way that enables these operations to work more smoothly and efficiently and the practicability of the logistics as well as costs for importers, carriers, port operators and ultimately the customers work far better for them.