

Appendix 3: HARC - Response to Government on the Draft Border Target Operating Model

Environment Department

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DEFRA Biosecurity,
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By email

Dear Jo,

Heathrow Animal Reception Centre – Border Target Operating Model Consultation Response

After a number of delays the City of London Corporation (the City) was pleased to receive the draft Border Target Operating Model (BTOM) and we support the focus in the Ministerial foreword of ‘creating the most effective border in the world, by introducing an improved regime of sanitary, phytosanitary and security controls on imports.’ We agree that these controls are essential to maintaining our security and biosecurity and will better protect us.

The City has an interest in the BTOM as it operates the Heathrow Animal Reception Centre (HARC), the only all species live animal BCP in the UK. The HARC has established itself as a world leader in the care of animals during transport since 1977. Open 24 hours a day, 365 days a year, the centre receives and cares for millions of animals of all types. The City is also the Local Authority for the whole of Greater London for the purpose of the provisions of the Animal Health Act 1981 relating to imported animals and their welfare.

Pre-pandemic, approximately 75-80% of live animals imported by air are flown into Heathrow and come through the Centre. Corporation staff work very closely with the Animal and Plant Health Agency (APHA) and Border Force to ensure animals are shipped in compliance with the law. The City takes formal action, including prosecution proceedings when warranted.

The City is also the London Port Health Authority (LPHA) for 94 miles of the tidal river Thames, from Teddington Lock to the outer Thames Estuary. The area includes the ports of London Gateway, Tilbury, Tilbury 2, Purfleet, Thamesport and Sheerness, in addition to London City Airport. It should be noted that whilst this response focusses on the HARC and the control of live animals into the UK, a separate response from the City in relation to food and feed will follow in due course.

With regards to the control of live animals, the HARC are pleased that threats posed to public and animal health from the import of live animals are recognised, along with the aim to protect animal health and welfare (in addition to public and plant health). HARC also fully supports the move towards a risk-based approach to border controls for live animals, including a consistent approach for EU and Rest of World (RoW) imports.

We are also pleased to note that live animal imports will be classified as high-risk and will require pre-notification, simplified health certificates, documentary checks and a higher degree of physical and ID checks, with 100% identity and physical checks in most cases. We appreciate that there may be some exceptions to the requirement for 100% checks for high-health animals such as racehorses from low-risk countries, some zoological animals and some live aquatic animals.

We would hope that any reduction in the 100% checking requirement is based on strong scientific evidence and discussions with the trade, trade bodies and regulators. HARC has previously been involved in the gathering of scientific evidence and sits on a number of groups, and would be willing to continue to do so to assist this process. This monitoring activity would protect against the impacts of a 'race' by importers to reduce the border controls to minimum levels.

We also note and support the common theme of simplification and digitisation at the border, which will ensure that we can balance biosecurity with an efficient trading border. Although we understand that the Trusted Trader schemes/pilots are not initially being considered for live animal imports, they may assist in the reduction of checks for those live animals specified above. However, HARC would have some concerns regarding the wider use of the schemes in this space.

Whilst we appreciate that there are temporary controls undertaken at the point of destination for live animals arriving from the EU, we strongly believe that checks on all live animals, except in very specific cases due to welfare etc, should be undertaken at the border or a nominated BCP in the case of the short straights. We believe that this is the best way to protect animal health and welfare.

We welcome the potential funding possibilities for live animal facilities at ports, but we strongly feel that this should be linked to a clear strategy for the UK, which is based on routes, current and potential throughput, needs and capacity. Designation and funding should then be linked to this strategy, which will ensure that live animal BCPs and their operators remain viable, and it will assist APHA in its ability to resource appropriately. With the exception of the short straights, HARC strongly believes that existing infrastructure should be prioritised for investment as they and the associated industry/stakeholders are already based around these points of entry, especially as live animals have fewer points of entry than other commodities.

Failure to have a strategy as outlined above will lead to unfair competition in the live animal environment, with commercial enterprises setting up and targeting high throughput and high profit elements of the work (which often balances out the low volume high-cost imports), based around the high-volume points of entry. In these scenarios it would be easy to envisage a manipulation of trade to high volume routes and/or existing BCPs no longer remaining viable, with the end result being that there is not enough capacity for the right species for the right point of entry.

HARC are experiencing this very problem at Heathrow, with the setting up of a commercial BCP, which has targeted specific species of live animal imports even though HARC had more than enough capacity for all species except for non-commercial cats and dogs at peak times. This has the potential to impact on the viability of HARC as the only all species BCP in the UK.

Unlike commercial BCPs, HARC is independent from commercial operations and is operated on a cost recovery basis, and we feel that this emphasis promotes and ensures animal health and welfare for all imported animals.

In summary, whilst HARC broadly supports the approach taken in the BTOM, there are a number of areas that we feel government should consider further in the final draft of the BTOM and when developing the

detailed arrangements. This includes developing a 'live animal BCP strategy' to ensure that there is appropriate capacity for the right species at strategic points of entry into the UK from the EU and RoW. This strategy should then be used to fund the development of infrastructure, and this funding should prioritise existing BCPs as they are already based around points of entry and the associated industries. Although it is appreciated that there are a number of strategic points of entry that would also need to be considered. HARC also broadly supports the approach regarding risk and checking requirements, and would be interested in helping the government and trade to develop this approach further.

HARC has and is committed to working with government on developing these principles to ensure that animal health and welfare, and public health is protected, whilst facilitating trade.

Yours sincerely,

**Port Health & Public Protection
Department of the Environment**