



# Port Health Delivery Plan 25/26

## Service Profile

As the London Port Health Authority (LPHA), the **Port Health Service** is responsible for a district extending for 94 miles along the River Thames from Teddington to the outer Estuary. The area includes the London Gateway port as well as the ports of Tilbury, Tilbury 2, Purfleet, Thamesport and Sheerness. The area also includes London City Airport as well as the various docks and dockland areas which have now been redeveloped.

The Service aims to deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health by controlling food and feed imports; food standards, food safety and water quality; infectious disease control; civil contingencies; ship sanitation; environmental protection and shellfish control.

The control of imported food and animal feed is an important requirement as the checks take place at ports that are first point of entry into the United Kingdom.

Last financial year saw significant changes in the way in which the Service was delivered. The imposition of checks to imported food and feed entering from the EU was brought alongside existing checks on food and feed from the rest of the world (RoW) through the Border Target Operating Model.

The service significantly restructured to form 4 groups – each a multidisciplinary team of technical and professional officers, managed by a group manager and two team leaders each. A further team managed by a Business Manager provides Technical Administration Support to the 4 groups. Operating Hours were extended by 4 hours per day, adding an extra 20 hours per week to our service coverage.

Port Health also contains the River Division with bases at Denton, Gravesend and Charlton. This team leads on ship sanitation, shellfish sampling, noise and nuisance control on the tidal Thames and ceremonial duties.

Now LPHA are responsible for compliance checks for all food and feed imports from the EU and the Rest of World (RoW) that enter via the Border Control Posts at London Gateway, Tilbury, Tilbury2, Purfleet, Thamesport and Sheerness.

The Port of London is the largest mixed cargo port in the United Kingdom. Containerized cargo continues to grow through further phased development at Tilbury and the investment in the 4<sup>th</sup> berth at London Gateway which came online in January 2025, quickly attracting a new customer base. Investment in the ports of London remains strong and underpins long term forecasts for growth.

## Service Responsibilities

The main activity for LPHA is the checking of food and feed imports from all countries which includes checks on all of mainland Europe. Cargo arrives from many areas of the world including South America, Africa, Australia, New Zealand, India, East Asia, the Mediterranean, USA, and Canada.

In addition to its imported food responsibilities, LPHA also has responsibility for Animal Feeding Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Shellfish classification forms one of the many tasks performed by the River Division; there are 17 active beds (2 declassified last year) within the Authority's area and 4 further active beds are monitored on a contractual basis for Swale Borough Council, and Thanet Borough Council plus additional samples are taken for FSA projects, as required.

Infectious disease control continues to present a significant effect on staff resource with enhanced checks of all vessel arrivals in our area. Relationships developed during the pandemic remain strong, such as those with Border Force, Port of London Authority and relevant port operators who assist in maintaining the biosecurity of the UK's borders.

Drinking water quality has remained an area of significance as vessels moor up for longer periods of in activity in the docks and surrounding areas (including the River and London City Airport).

Port Health Service Aims and Ambitions

The Port Health Service aims to:-

- Ensure compliance with legislation related to imported food and animal feed to protect public, animal and environmental health
- Deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health throughout the London Port Health Authority district

It is the ambition of LPHA to:

- Develop our Port Health Service to be the fastest processor of imported food and feed consignments in the UK whilst maintaining robust biosecurity measures at the border.
- At all times to seek value for money in the activities we undertake so that the highest possible standards are achieved cost effectively.

Links to City of London Corporation Plans

The Port Health Service Plans link to the Key Service Objectives set out in Port Health & Public Protection Business Plans.

 [Env Dept HLBP 2025-30 - FINAL.pdf](#)

Port Health and Public Protection High Level Delivery Plan

1. Promote and Protection Animal and Environmental Health, and Consumer Protection. The High-Level Business Plan requires us to Embed the Border Target Operating Model (BTOM) at Ports for Food and Feed.

Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
b) Protect and promote Public, Animal and Environmental Health and Consumer Protection					
1. Embed the Border Target Operating Model (BTOM) at the Ports for food and feed and at Heathrow for live animals (AVI). <ul style="list-style-type: none"><li>Finalise development of the services to move to Business as Usual operations by Q3 2025/26.</li></ul>	4.8%  (BTOM work is cost neutral)	44%	Providing Excellent Services  Vibrant Thriving Destination  Dynamic Economic Growth	<ul style="list-style-type: none"><li>% of checks undertaken on low and medium risk food and feed imports.</li></ul>	<ul style="list-style-type: none"><li>Provision of effective biosecurity controls at the border and promotion of animal welfare.</li><li>Realisation of new border controls for food and feed from the EU where the service is meeting demand from industry whilst providing effective public health protection.</li></ul>

2. Ensure Provision of Appropriate Facilities to enable delivery of services. The High-Level Business Plan requires us to Carry out a strategic review of operational facilities to ensure they are fit for purpose to enable effective, efficient and sustainable service delivery.

Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
<b>c) Ensure provision of appropriate facilities to enable delivery of services</b>					
1. Carry out a strategic review of operational facilities to ensure that they are fit for purpose to enable efficient, effective and sustainable service delivery. Review to include: <ul style="list-style-type: none"> <li>Cemetery and Crematorium.</li> <li>Public conveniences.</li> <li>Port Health Service accommodation.</li> <li>Heathrow Animal Reception Centre.</li> </ul>	0.3%	0.5%	Providing Excellent Services	Narrative updates will be provided on progress against the actions listed.	The continued delivery of high quality statutory services to customers and stakeholders in the most efficient and sustainable manner.

3. Financial Security and development. Consider commercial development opportunities for Port Health in London and the wider area.

Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
<b>d) Financial security and development</b>					
1. Consider commercial development opportunities for Port Health and HARC across London and a wider area. :	0% (cost neutral)	3%	Dynamic Economic Growth Flourishing Public Spaces Providing Excellent Services Vibrant thriving destination	<ul style="list-style-type: none"> <li>Provide an additional 300 lawn graves by end of Q4 2025/26.</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable services delivering high quality outcomes and 'steady state' infrastructure.</li> <li>Generation of additional income for the services to protect staffing levels and ensure sustainable delivery of statutory services.</li> <li>Increase CoL reputation for delivery of excellent public services within the Square Mile and beyond.</li> </ul>

## Risks

### Our key risks\*

Our business risks are managed in accordance with the Corporate Risk Management Framework. Risks are regularly reviewed and updated by management teams in consultation with risk owners. Committees receive regular updates on the risks held by the services within their remit to provide them with necessary assurance that risks are being managed and mitigated effectively, and to enable Members to fulfil their oversight and scrutiny role.

Our key service-level risks for the Port Health and Public Protection Division and the Cleansing Service are listed below.

Risk Title	Score
Brexit – impact on Port Health and Animal Health	RED, 24
Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business	RED, 16
A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	AMBER, 8
Air Quality (Department-level risk)	GREEN, 3

**\*Risk details were correct at November 2024 but are subject to continual review and change.**

## **Mitigations**

The Port Health Service is committed to creating aspirational roles, with career progression and job satisfaction.

A number of our team joined the service in more junior role and have developed upwards. Last year we restructured adding in some progression posts at the technical level with the aspiration of providing first line manager training, and an apprenticeship which would allow us over the long term to 'grow our own' Environmental Health Practitioners (Port Health Officers).

We have invested and will continue to invest in professional and personal development to achieve a sustainable, inclusive, resilient and agile workforce.

We are developing effective and collaborative relationships with business partners, the PH&PP team regularly meet with City Surveyors, Finance, HR and Media Teams either together or on an individual basis. A standout from last year was the multi business partner BTOM project group which oversaw the changes to the service.

Last year we implemented the Seal Check App, as part of our continued drive to develop our use of ICT, data and intelligence led solutions, and to ensure that the service is as effective and efficient as possible.

The Port Health Management team regular engage with PLA, DEFRA, FSA, Border Force, APHA and many other external stakeholders to ensure that we stay in tune with the external demands placed upon the service in the short, medium and longer term.

## **Scope of the Food and Feed Service**

The LPHA is responsible for enforcing legal requirements relating to food safety and food standards for all food and animal feed that is imported through the ports within its area. This includes:

- Operation of the Border Control Posts at London Gateway Port, Tilbury, Tilbury 2, Purfleet and Thamesport
- Monitoring for illegal food or animal feed imports at any of the Ports within the district
- Carrying out documentary, identity and physical checks on imported consignments of products of animal origin and products not of animal origin
- Making checks of fish catch certificates to ensure compliance with regulations concerning Illegal, Unreported and Unregulated Fishing
- Sampling food and animal feed for chemical analysis and microbiological examination
- Checking consignments of imported animal feed comply with the relevant legislation
- Controls relating to Food Contact Materials
- Enforcing Contaminants in Food legislation
- Verification of Organic Produce
- Control of infectious diseases and food poisoning in liaison with UK Health Security Agency (UKHSA)
- Control of shellfish harvesting areas including sampling for classification and biotoxin analysis
- Sampling of drinking water supplied to vessels and from fixed points within the port boundary
- Food safety and hygiene inspections of premises and craft at dock locations and London City Airport
- Control of nuisance from the ports of London and regulation of premises under the Integrated Pollution Prevention and Control (IPPC) regime.

Other responsibilities that are delivered alongside the food service include:

- Enforcement of Rabies prevention legislation
- Export Health Certification as a direct result of our departure from the European Union.
- Investigating and controlling statutory nuisances including the investigation of complaints with regard

to noise and odour emissions from certain port industries

- Monitoring of waste control procedures relating to International Catering waste
- Inspection of vessels under the International Health Regulations and UK health legislation
- Liaison with Government Departments and Agencies
- Co-operate with Port Health Authorities nationally and internationally to maintain and improve service delivery.

## **Service Demands**

### **Imported Food**

Our main goal is to ensure that the Port Health Service is meeting its statutory obligations in relation to imported food and feed control. In doing this we aim to promote consumer confidence as a result of our work to assure the safety of the food supply chain, whilst protecting public, animal and environmental health.

Whilst meeting our statutory obligations we also have to pay attention to the principles of Better Regulation and take into account the way we deliver and enforce the legislation that we are responsible for.

LPHA has developed good working relationships with the trade using our ports by trying to understand the risks affecting businesses and dealing with consignments efficiently so as to avoid delays because of the checks we are obliged to carry out.

This understanding is an important aspect of our Service; however, there is a need to strike a balance between support for businesses, especially smaller businesses, and protecting consumers and others from fraudulent and illegal practices.

The main inspection activity for high risk non animal origin (HRNAO) and products of animal origin (PoAO) from countries outside the EU takes place at London Gateway Border Control Post (BCP) and, now to a lesser extent, Tilbury BCP.

With the implementation of EU checks we have seen a wider spread of import work geographically, which presents challenges both in terms of increased inspections, additional documentation checks, longer operating hours and increased traveling for staff – this has seen our staffing contingency grow from 50 to 105 staff within 12 months.

Changes in throughput have had a significant effect on the operation of the service. Additionally, whilst the Border Target Operating Model (BTOM) has lowered checks for most RoW countries and/or products, volumes of these imports are also predicted to increase as London Gateway attracts more business, and the associated logistics park development continues to expand. Berths 5, 6 and a second rail head are due to be delivered within the next 2 years. Failure of the Service to clear cargo swiftly will have a detrimental business effect and tarnish the reputation of LPHA and by implication, the City of London Corporation.

Throughput variations are a challenge because of numerous external factors affecting trade, including seasonal variations. This means that a flexible workforce is required to meet the fluctuations in service demand.

Under the new BTOM regime controls will be applied to goods proportionately based upon their risk categorisation:

- High risk (predominantly live animals, germinal products and goods under safeguard measures) will require pre-notification, simplified health certificates, documentary checks and a higher degree of physical and ID checks.
- Medium risk will require pre-notification, simplified health certificates, documentary checks and be subject to risk-based identity and physical checks at the border. Some will be set at 1%

physical and identity checks, although other goods will be considerably higher based on specific risks.

- Low risk will have minimal routine border controls applied. The proposal is for there to be no health certification or routine physical border checks, only a pre-notification data set and commercial documentation will be required for all low-risk animal products along with routine surveillance.

If risks increase or decrease and commodities need to move between risk categories, traders will be given 3 months notice so they can adapt their processes as needed, unless urgent protective action is required. The ability to apply emergency control measures on any commodities which pose an imminent risk to human or animal health will be retained.

The Accredited Trusted Trader scheme is still in pilot stage. This scheme would allow frequent importers of products of animal origin and animal by-products to potentially reduce the need for routine physical checks at the Border Control Posts by taking responsibility for carrying out routine checks and sampling to ensure the protection of biosecurity, animal and public health whilst being closely regulated by government.

LPHA continues to engage with Government Departments and other Port Health Authorities to understand and influence decisions post EU Exit.

The hours of operation currently being worked are 06:00hrs to 22:00hrs Weekdays, 08:00hrs to 16:15hrs Saturdays and Sundays. The need to amend operational hours as a result of existing port operations also remains under regular review. The introduction of a nightshift is planned for 25/26 operating from 22:00 until 03:00 to assist with the EU trade.

Changes to legislation places considerable demands on the Service; often the changes can be at short notice to respond to a particular problem. In particular, problems with microbiological contamination, undeclared cargo, pesticide and veterinary drug residues continue to surface. Controls implemented at short notice may continue to operate for a long period such as those implemented following the issues with Brazilian beef and poultry and all High Risk non animal origin products.

Other emerging risks are notified by the FSA, in addition our Public Analysts circulate information to assist in determining which products may require our attention. Updates to the “High Risk” list under the UK's adopted version of Regulation (EC) 2019/1793 now take place every 6 months.

Checks of catch certificates and other documentation (including EU origin from January 2021) under legislation related to the import of illegal, unreported and unregulated (IUU) fishery products is time consuming as a considerable number of consignments have multiple certificates relating to the products being imported. The LPHA has good liaison arrangements with the UK Single Liaison Office of the Marine Management Organisation (MMO) who are responsible for this area of work. The introduction of EU sourced imports has increased the volume of checks in this area of control.

The trade expects consignments to be cleared as quickly as possible as delays result in additional costs and disruption to their business. For this reason, our Business Plans include a performance indicator to measure the time it takes to release consignments. Where containers have to be detained; queries on documentation are processed as quickly as possible; samples are submitted efficiently and there are Service Level Agreements with the laboratories to ensure delays are kept to a minimum.

## **Food Hygiene and Standards**

A small number of food businesses remain within the docks and London City Airport, including processing plants located outside of the dock areas but within the Port of London district that require inspection, in-house expertise has been retained to carry out this work. The volume of work is likely to increase as the port logistic

centres are developed at London Gateway and Tilbury. N.b. the logistics park at London Gateway is now subject to a Section 101 agreement with Thurrock Council

### **Products of Animal Origin**

Sampling of imported Products of Animal Origin (POAO) is carried out in accordance with detailed EU rules and an internal sampling plan related to the physical checks that are undertaken by the Official Veterinarians and Port Health Officers. The aim is to sample between 1 and 10% of all the physical exams carried out linked to a sampling matrix that is produced quarterly anticipating the number of samples required. This is reviewed quarterly in order to make the necessary adjustments in accordance with any throughput variations. Samples taken may contribute to the National Sampling Plan coordinated by the FSA.

### **High Risk Non Animal Origin**

The legislation relating to High-Risk non-Animal Origin products (HRNAO) is now reviewed on an ad hoc basis following divergence from the EU, this can mean changing requirements for sampling. Temporary increased controls because of emerging risks or widespread non-compliance plus other emergency measures add to the rapidly changing nature of these controls. Close liaison with the laboratories is essential because of the potential impact the change will have on them. Insufficient laboratory capacity or expertise is a concern which can cause considerable delays to imports.

### **Shellfish**

As the Food Authority for the tidal Thames, the Service has responsibility for the harvesting of shellfish throughout its area. The LPHA has a responsibility for monitoring the harvesting of shellfish throughout its area. A sampling program is in place for classification purposes and biotoxin monitoring. Sampling for Swale and Thanet Borough Councils is carried out on a contract basis, with any follow up enforcement activity being carried out by local teams.

### **International Health**

London City Airport is within the LPHA boundary and checks are made under the Public Health (Aircraft) Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 is in force and has implications for food safety and potable water on board aircraft. Supplies of water at London City airport are regularly sampled and analysed. In addition to the controls on water supplies, regular inspections of the outside catering units and the vehicles delivering the foods for aircrafts are performed.

Port Health Authorities have powers and duties to prevent and control risks to human health from infection or contamination, including by chemicals and radiation. This includes investigating incidents relating to foodborne illnesses in premises and on vessels and in relation to infectious disease control

LPHA officers board vessels including Cruise Liners arriving within the port to undertake inspections under the Public Health (Ships) Regulations and issue Ship Sanitation Certificates under the International Health Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 also applies sections of the Food Safety Act to vessels arriving in port. We work closely with other Port Health Authorities to enforce standards on vessels, in particular to ensure “problematic” vessels are tracked around the UK.

In 2024/25 officers recorded 2993 vessel arrivals, boarding 61 and issuing 30 ship sanitation certificates. Our vessel arrival number includes multiple arrivals of the same vessel during the defined period.

The Service has an Infectious Disease Protocol that has been drawn up in conjunction with UKHSA. Close liaison takes place between UKHSA staff and the LPHA following the protocol to ensure control of the situation.



## **LPHA Approach to Enforcement**

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the FSA and in accordance with their "Food Law Enforcement Service Planning Guidance" and the content of the Plan provides the basis upon which the London Port Health Authority will be monitored and audited by the FSA.

The City Corporation is committed to the principles of the Regulators' Code, a statutory code for all regulators. Port Health & Public Protection has its own Policy Statement on Enforcement which has been approved by the Port Health & Environmental Services Committee and sets out its approach to enforcement. The policy can be found [here](#).

The LPHA provides advice and support to business is in line with the FSA's Code of Practice. The Service aims to maintain and build on existing relationships to encourage businesses to meet their legal obligations and to develop best practice.

Detailed information on the Service's activities and practical advice on compliance with legislation is available on the City of London website [www.cityoflondon.gov.uk/porthealth](http://www.cityoflondon.gov.uk/porthealth). The website is regularly updated to include any changes in legislation or procedures.

Where we cannot provide the advice sought, the enquiry will be referred direct to either a dedicated branch of the FSA, Defra or the MMO.

On a routine basis, information regarding new "controls" is sent direct to importers and agents. Where necessary, individual meetings are also held with agents, importers and other trade organisations to clarify and discuss legal issues and best practice.

We also provide updates on current issues and offer advice and support in the use of electronic systems such as IPAFFS.

## Port Health Delivery Plan

Progress against the Key Performance Indicators and Key Objectives will be reported to the Port Health and Environmental Services Committee on a four monthly basis throughout the year.

The City's Corporate Plan has a number of key themes supported by the Port Health Function, these are:

## Port Health Performance 2024/25

PH1	POAO <ul style="list-style-type: none"><li>• Documentary checks 110,290 CHEDPs were validated.</li><li>• Physical checks 3683 Samples 204</li></ul>
PH2	PNAO <ul style="list-style-type: none"><li>• Documentary checks 33402</li><li>• Physical and Identity checks 5140</li><li>• Samples 1438</li></ul>
PH3	Number of shellfish samples collected 228
PH4	Percentage of Food Hygiene Inspections completed. 100% (160 in total (141 in LPHA area, and 19 in Logistics Park)
PH5	Percentage of operational time the Launch and ancillary craft are available. 95%
PH6	All permitted process to have 1 inspection minimum each year. 11 inspections undertaken on the permitted activities,
PH7	Number of ship boardings: 2024/25 – 61 boardings (7 of which were cruise ship inspections and 30 SSCEC renewal inspection
Notes	POAO - Products of Animal Origin PNAO - Products of Non-Animal Origin

## Corporate Key Indicators 2025/26

PI 1.	Proportion of RoW imported food and feed consignments that satisfy the checking requirements cleared within five days: <ul style="list-style-type: none"><li>• POAO<ul style="list-style-type: none"><li>○ Non-fish 85%</li><li>○ Fish 85%</li></ul></li><li>• PNAO - 85%</li></ul>
PI 10.	85% of imported food and feed consignments (PNAO) are subjected to mandatory documentary controls within five days.
Notes	POAO - Products of Animal Origin PNAO - Products of Non-Animal Origin