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Ref: NBP/kab

25 October 2023

Joanne Bradshaw  
Director, Defra Biosecurity, Borders & Trade Programme  
(Via Email)  
DEFRA

Dear Joanne

**Re: Border Target Operating Model – local authority recruitment and funding intentions**

We write in response to your letter addressed to Local Authority Port Health Managers concerning the above, dated 10 October 2023.

We note the Government's advice to immediately begin recruitment and other operational preparations for the implementation of the Border Target Operating Model (BTOM). We understand funding support is available until 30 April 2024, when local authority Port Health Authorities should commence full cost recovery and note that additional financial support is available on application until 31 July 2024, after which all central government funding support will cease.

In response, we write to advise you that this authority will be unable to follow this advice until such time as our Cabinet has had time to consider all available options open to this authority, including the short and long-term financial viability of our Port Health Service, and the feasibility of successfully meeting all of the necessary requirements for such in the time allocated for complete implementation of the BTOM.

Our concerns are summarised as follows:

- Implementation of Sanitary and Phyto-sanitary (SPS) checks at UK borders has already been delayed by UK Government on a significant number of occasions since the UK left the European Union in 2020. It has been established that implementation of these checks will cost UK economy an estimated £330 million per annum (Source: Cabinet Office). It is therefore considered possible that this implementation will again be delayed until after the impending general election. Should this occur, this would place current and proposed port health resourcing in jeopardy, and also risk further financial penalty on Portsmouth taxpayers.
- Based on figures supplied by HMRC this authority has consistently detailed and communicated the necessary estimated resources with DEFRA which are required to meet the SPS check demands through Portsmouth International Port. At the time of writing there is no confirmation as to how much of the required resource this authority can claim support for.

- The proposed funding window and cut-off date does not provide this authority sufficient time to implement full cost recovery measures without placing a considerable financial risk on the Portsmouth taxpayer. Considering the uncertainty of supply and demand within the proposed business model, our Cabinet needs time to consider the implications of such, and the financial risks involved.
- With the current shortage of skilled port health personnel in the employment market, it is unlikely that any recruitment initiative undertaken between now and the proposed BTOM implementation date will allow adequate time to yield enough trained officers to meet the resource and competency requirements to fully staff Portsmouth's Border Control Post.
- The BCP facility built for the Port Health function at Portsmouth International Port (PIP), was originally constructed for the Border Operating Model (BOM). Required inspections under the new BTOM will reduce the use of the facility significantly. The port is waiting on further data before making any strategic decisions on the use of the facility.
- Whilst PIP have advised that the designated portion of the facility could be used by the PHA in the short term, subject to the current timetable going ahead, it is possible that this facility may become unavailable for use by the PHA and will be repurposed in order to recoup the considerable funds used to build and equip it under the now redundant provisions of the original BOM. If this happens, an alternate option for a much smaller BCP needs to be considered. All of which will require significant funding, placing risk on the taxpayer the PIP, and the Port Health team.
- If the situation arises that the income generated is insufficient to cover the costs of equipping and staffing the BCP, noting that this costing has to be agreed with DEFRA in advance; will there be any further support post July 2024? If this is not available, then it will be assumed that the cost will be either borne by the Portsmouth taxpayer or that there will be a reduction in service which could affect efficiency of function. If there is any additional cost to the taxpayer this is contrary to the Government's New Burden's doctrine.

We will contact you regarding this authority's intentions in this matter when the Cabinet process outlined above has been completed.

In the meantime, it would be helpful if you could provide specific responses to the above, particularly the latter point regarding funding, which will assist in our decision-making process, and formulating the way ahead.

Yours sincerely,

**Cllr Steve Pitt**  
**Leader, Portsmouth City Council**  
**Portsmouth City Council**

**Natalie Brahma-Pearl**  
**Chief Executive**  
**Portsmouth City Council**