

APPENDIX 2

SEVINGTON PAINTING – SUMMARY OF KEY POINTS

Painting Sheds – Determined as Not Reasonably Practicable and/or Operationally Feasible

The paragraphs below summarise the reasons for the determination by the Applicant that certain site operations, specifically related to potential painting or similar maintenance that would require temporary closure of inspection sheds, are not considered reasonably practicable or operationally feasible. The assessment is based on significant concerns that relate to Health and Safety (H&S), critical operational continuity, financial implications, and national security risks.

(i) Operational Feasibility and H&S Grounds

Any interference with the continuity of the core site operations presents substantial H&S risks and would practically inhibit the site's critical checking capacity, so having a potential impact on Great Britain's (GB) food security and national biosecurity functions in relation to the Short Straits. As has been identified:

'Around a quarter of the UK's food imports pass through the Short Strait (Dover and the Channel Tunnel), and short-life products from the EU are highly reliant on these routes. 62% of fruit and vegetable imports from the EU arrive via the Short Strait, 43% of meats and 41% of dairy imports'. [United Kingdom Food Security Report 2021: Theme 3: Food Supply Chain Resilience - GOV.UK](#)

Site operations by the painting of the sheds would be affected by:

- *working at height regulations*: compliance with Working at Height Regulations would necessitate the erection of scaffolding around the front, sides, and roofs of the inspection sheds, or the deployment of cherry pickers. It is anticipated that such work would consequently prevent the checking of Heavy Goods Vehicles (HGVs) at the affected sheds during any such maintenance period.
- *paint fumes*: the presence of paint fumes poses a potential H&S risk to staff which it is expected would need to be mitigated by requiring the temporary closure of operations at the sheds being painted.
- *rolling closures*: the closure of sheds on a rolling basis has been considered, but the conclusion is that this approach would still significantly restrict the site's overall capacity, so reducing the capacity for essential customs checks and biosecurity measures at the Short Straits border.

(ii) Critical Infrastructure and Non-Replicable Facilities

Both the Department for Environment, Food & Rural Affairs (**Defra**) and His Majesty's Revenue and Customs (**HMRC**) operate inspection infrastructure at this site that cannot be replicated elsewhere on site or at other locations, making any closure highly disruptive. For example:

BCP Shed A (Defra): this facility processes products of animal origin and adheres to the highest level of biosecurity. Closing this specialised facility, even temporarily, leaves the nation exposed to biosecurity risks during the duration of the closure.

HMRC Shed 5 (Border Force): this is utilised 24 hours a day, 7 days a week and 365 days a year for the drop-off and collection of goods under temporary storage. There is no alternative facility on site that can perform the same function. Temporary closure would therefore have severe operational implications.

(iii) Cost and Commercial Risk

Temporarily closing the site, or the parts identified above, would be excessively expensive.

Specialist Contractors: exterior building panels are Kingspan; any over-painting must be carried out by professional, specialist repair companies using approved maintenance paints, adding to the cost and complexity.

Commercial Risk: a period of reduced operational capacity at the Border Control Post (BCP) and Inland Border Facility (IBF) would likely cause disruption at the Short Straits border. Defra would be faced with deciding between the high biosecurity risk of auto-clearing high-risk goods or halting imports through this vital route.

(iv) Political and Reputational Risk

Reducing border operational capacity is considered to be politically unacceptable. With the Government currently engaged in EU reset negotiations, impaired border operations would be viewed negatively and risk reputational damage to the United Kingdom. Furthermore, there could potentially be non-compliance with World Trade Organisation (WTO) obligations.

Summary - due to the combination of the factors identified above, the Applicant considers the proposed action not to be reasonably practicable nor operationally feasible.