



27<sup>th</sup> August 2024

The Rt Hon Wes Streeting MP  
Secretary of State for Health and Social Care  
Department of Health and Social Care  
39 Victoria Street London  
SW1H 0EU

Dear Secretary of State,

## Legislative reform for effective implementation of International Health Regulations (IHR) at UK borders

We are writing to you on behalf of the Chartered Institute of Environmental Health (CIEH), the professional membership body representing over 7,500 Environmental Health professionals across the UK. Our members work in local government, the private sector, and academia, dedicated to safeguarding public health through various disciplines including food safety, health and safety, housing, environmental protection, as well as protecting the UK's biosecurity at our ports and borders. The Association of Port Health Authorities is an employer membership body, representing the interests of Local Authorities and Port Health Authorities with responsibilities for health controls and sea and airports. There are members of the Association throughout the UK who actively work to share expertise and best practice to deliver a consistent and effective port health service. It contributes significantly to national and international policy development and keeps its members up to date with changes in legislation and guidance."

We wish to bring to your attention a critical issue that has significant implications for the UK's public health and border security. The implementation of the International Health Regulations (IHR) is currently hampered by outdated and fragmented domestic legislation, leading to enforcement challenges that undermine our national health security.

### **Background:**

As you are aware, the International Health Regulations (IHR) are a legally binding framework established by the World Health Organization (WHO) to ensure and improve global health security. The UK, as a signatory to the IHR, is committed to implementing these regulations to prevent and respond to public health risks that have the potential to cross borders. However, our current legislative framework is inadequately equipped to meet these obligations effectively.

### **Current challenges:**

- **Outdated legislation:** Our border health legislation dates to 1979, with amendments made in 2007 to align with the IHR at that time. Despite these amendments, the integration was poorly executed, resulting in a convoluted legal landscape that includes remnants of the 1979 regulations alongside the 2007 updates. It also fundamentally misinterprets the IHR in key areas. This patchwork approach has created significant gaps and inconsistencies, making it challenging to enforce IHR standards at our ports.
- **Lack of enforcement mechanisms:** While the UK is fully committed to the principles of the IHR, there is no designated authority or clear mechanism to enforce these regulations effectively at our borders. For instance, designated ports of entry are required to have facilities to assess passengers who may be unwell, but the absence of clear enforcement route means these requirements are often unmet. This poses a serious risk to our ability to manage and contain public health threats.
- **Inconsistent standards:** The current regulations and procedures are marked by confusion and anomalies, which result from a fragmented approach to legislative updates. This inconsistency hampers the ability of port health authorities to uniformly apply and enforce health regulations across all points of entry.

#### **Proposed solutions:**

1. **Comprehensive legislative reform:** To address these issues, we propose the introduction of new legislation to codify the IHR within UK domestic law. This new legislation should:
  - **Repeal outdated regulations:** Eliminate remnants of the 1979 regulations to avoid confusion.
  - **Fully integrate IHR requirements:** Ensure that all IHR amendments are clearly and consistently incorporated into domestic law.
  - **Establish clear enforcement powers:** Define and delegate enforcement powers to Port Health Authorities (PHAs) and Local Authorities (LAs), ensuring they have the authority and resources needed to implement IHR regulations effectively.
  - **Standardise procedures:** Develop uniform procedures and standards across all ports to ensure consistent application and compliance with IHR.
2. **Empowering local authorities:** Local Authorities (LAs) possess the enforcement powers needed to implement IHR regulations effectively. Enhancing their role aligns with Labour's mission to further devolve powers to local government, ensuring that those closest to the community have the authority and resources to protect public health at our borders.
3. **Leveraging recent IHR amendments:** The recent amendments to the IHR, as highlighted in the UK statement at the 77th World Health Assembly, present a timely opportunity for the new government to take a leading role in shaping these developments. As the UK looks to

implement these amendments into domestic law, now is the ideal time to review and improve the current legislative framework, ensuring it is robust and fit for purpose.

**Lessons learned from COVID-19:**

COVID-19 has starkly highlighted the importance of robust border health regulations. The 77th World Health Assembly emphasised building on these lessons, leading to a package of critical amendments aimed at enhancing global preparedness, surveillance, and response to public health emergencies, including pandemics. The amendments focus on ensuring equitable access to medical resources, establishing clear definitions and mechanisms for pandemic emergencies, and enhancing national and international coordination. By addressing these weaknesses through updated and comprehensive legislation, we have a unique opportunity to enhance our pandemic preparedness and ensure a coordinated response to any future public health threats. This proactive approach will not only safeguard public health but also reinforce public confidence in our ability to manage and mitigate such crises. Furthermore, it will highlight the UK's commitment to international collaboration and adherence to best practices, setting a precedent for global health security.

**Our commitment:**

Environmental Health professionals played a crucial role during the COVID-19 pandemic, and they continue to be vital in pandemic response and protecting the UK's biosecurity, both at our borders and inland. The Chartered Institute of Environmental Health (CIEH), as the professional membership body for Environmental Health professionals, wishes to offer our services as a trusted partner in this space. We are willing to engage constructively with the new government and would welcome the opportunity to meet with the Secretary of State, members of his team, or departmental officials to discuss how we can support these efforts. Our expertise and commitment to safeguarding public health make us a valuable ally in enhancing the UK's border health regulations. We look forward to your support in this crucial endeavour.

Yours sincerely,  
Fran McCloskey

A handwritten signature in black ink, consisting of the letters 'F' and 'M' in a stylized, cursive font.

Chief Executive Officer, CIEH

Jon Avern

A handwritten signature in black ink, appearing to read 'Jon Avern' in a cursive script.

Chair, Association of Port Health Authorities