

Safety at Ports Project - Evaluation of risk and associated matters

National Trading Standards Board (NTSB)

Final Report

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Any enquiries about this report should be directed to enquiries@matrixknowledge.com

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List of acronyms

BIS	Department for Business Innovation and Skills
ERTS	Enhanced Remote Transit Shed
EU	European Union
HMRC	HM Revenue & Customs
LA	Local Authority
SPoC	Single Point of Contact
TS	Trading Standards
UKBF	UK Border Force

1.0 Executive Summary

Aim of the research

Unsafe goods imported from countries outside the European Union pose a large threat to the health and safety of consumers in the UK. The interception of dangerous consumer goods from countries outside the European Union (EU) at the point of entry is intended to prevent and reduce harm caused to people, business, and the economy by stopping unsafe and non-compliant products from reaching the market. The Safety at Ports Project was introduced to enforce consumer protection regulation at the source of the problem.

The National Trading Standards Board has commissioned Matrix to perform an independent evaluation of the Safety at Ports project in relation to the risks and associated matters of product safety at points of entry in England to help inform the future delivery and effectiveness of the service.

Methodology

Two methods have been employed for the evaluation:

1. interviews with Trading Standards (TS) representatives currently involved with the Safety at Ports project; and
2. cost benefit analysis to estimate the value of every pound spent at the point of entry.

Interviews were conducted with the 14 Trading Standards offices currently involved with the Safety at Ports project. This covers 12 points of entry across England. [Table 1](#) presents the points of entry and the associated Trading Standards office.

Table 1: Points of entry and associated Trading Standards office

Point of Entry	Trading Standards office
Felixstowe	Suffolk
Southampton	Southampton Hampshire
Heathrow	Hillingdon Hounslow Slough
London Gateway	Thurrock
Tilbury	Thurrock
Coventry postal hub	Warwickshire
Newcastle airport	Newcastle
Royal Portbury	North Somerset Bristol
Gatwick airport	West Sussex
Manchester airport	Manchester
East midlands airport	Leicestershire
Immingham docks	North East Lincolnshire North Lincolnshire

The decision model for this study compares two scenarios:

- Trading Standards office performs no market surveillance for goods arriving at port and unsafe goods are undetected: **the ‘do nothing’ scenario.**
- Trading Standards office performs market surveillance for goods arriving at port and detects unsafe goods: **the intervention scenario.**

In order to estimate the value for every pound spent at the point of entry, the cost benefit analysis based on the decision model was performed and includes three components:

1. costs of inspection (essentially this is based on the NTSB budget for the Safety at Ports project as well as the distributed cost of the Single Point of Contact for risk profiling consignments);
2. the number of unsafe items identified; and
3. the size and value of expected impacts on local authorities and consumers if unsafe goods are identified through inspection by the Trading Standards compared to the impacts if unsafe goods are distributed throughout the country.

Data used to populate the models was drawn from multiple sources including interviews with Trading Standards representatives, the previous economic model produced for the Local Better Regulation Office (LBRO) and published data sources.

Results

From the interviews with the Trading Standards representatives, the main issues facing Trading Standards offices revolve mainly around funding and capacity. Many Trading Standards representatives stated that the funding provided by the NTSB for carrying out surveillance activities is vital and without it, they would not be able to conduct the work. Also, many felt that with increased capacity, they would be able to conduct more surveillance. Other issues facing the Trading Standards offices are as follows:

- Difficulties in planning capacity for seasonal peaks and bottlenecks in high risk consignments that need to be checked.
- Lack of storage facilities.
- Difficulty in recruiting individuals with product safety experience.
- Lack of a co-ordinated approach to using and maintaining data on key central databases.
- Difficulty in prosecuting problem importers.
- The rise of internet traders.
- Importers increasingly importing goods through the postal service and private couriers.
- Developing good working relationships with other agencies involved with the safety of imports via points of entry in the UK such as UK Border Force and the Food Standards Agency.

Information obtained from the interviews led to the following recommendations being made by Trading Standards representatives to help improve activities around product safety:

- Continued funding from the NTSB
- Develop a national approach to dealing with product safety
- Streamline intelligence databases
- Increased co-ordination with UK Border Force

Results from the cost benefit analysis found, that in the absence of surveillance activities by Trading Standards offices at the point of entry, the value of the impact to society of unsafe goods potentially entering the consumer market has been estimated to be £281 million pounds per annum, with biggest impact on consumers (£273 million) from injuries, fatalities and fires from unsafe goods.

The total cost of surveillance activities for the Safety at Ports project is £667,365, which includes the NTSB funding for projects and the cost of the SPoC for risk profiling consignments. The points of entry included in the cost-benefit analysis were:

- Felixstowe
- Southampton
- Heathrow
- The London Gateway
- Tilbury
- Coventry postal hub
- Newcastle airport

As a result of surveillance, 1.11 million unsafe goods were estimated to be prevented from entering the consumer market.

Table 2 presents the net benefit and benefit cost ratio (B:C ratio) for each point of entry included in the cost benefit analysis. Net benefit is the difference between the total benefit generated by the intervention and its cost. Any value above zero, is deemed to be a positive return on investment. The B:C ratio is the ratio of the total benefit generated by the intervention and its cost and can be interpreted as value for money and a worthwhile investment if the ratio is greater than 1. The larger the B:C ratio, the greater the return on investment.

The net benefit for these surveillance activities at the points of entry ranges from £59,348 to £13.3 million. Our results suggest that for every pound invested in the points of entry, the net economic benefits generated by the points of entry range from £9 to £84. Felixstowe and Southampton are the most established ports within the Safety at Ports project and the net economic benefits generated from reduced impacts to consumers, public services, and businesses are £50 and £65 respectively for every pound invested in surveillance activities. Overall continued investment in the Safety at Ports projects is worthwhile and provides good value for money.

It should be noted that ports with the B:C ratio at the lower end of the scale are in their infancy and it is expected that once the projects have been actively performing surveillance and collecting data for at least one year, the B:C ratios should be nearer the higher end of the range. In addition, for all points of entry the results may be understated, as it does not include the potential benefits generated by the identification of incorrect goods

Table 2: Net benefit and B:C ratio by point of entry

Point of entry	Net benefit	B:C ratio
Felixstowe	£13,263,004	£50
Southampton	£10,910,004	£65
Heathrow	£2,042,667	£44
London Gateway	£478,104	£9
Tilbury	£1,302,783	£84
Coventry postal hub	£285,680	£19
Newcastle airport	£59,348	£9

The previous analysis for the LBRO found that for every pound invested in increasing surveillance at Felixstowe, it could generate £40 of economic benefits. This ratio included the impact of both unsafe and incorrect goods. While the focus for the current analysis is narrower in terms of goods considered, but broader in terms of other points of entry analysed, the results still show investment in surveillance at points of entry is worthwhile and value for money.

The break-even analysis¹ on the points of entry not included in the cost benefit analysis found:

- Royal Portbury would need to prevent 14 unsafe goods entering the country.
- Gatwick would need to prevent 13 unsafe goods entering the country.
- Manchester airport would need to prevent 14 unsafe goods entering the country.
- East Midlands airport would need to prevent 14 unsafe goods entering the country.
- Immingham docks would need to prevent 14 unsafe goods entering the country.

Data regarding the number of unsafe consignments and subsequently number of unsafe goods being imported via a point of entry came from a mixture of sources, and was often found to be inconsistent amongst Trading Standards offices and subject to large amounts of variation. To account for this uncertainty and to test the sensitivity of the benefit-cost ratio to variation in the number of unsafe consignments identified and the number of products per consignment, we ran sensitivity analysis around these two parameters. The results show that the conclusion of the analysis – i.e. that all points of entry represent a good investment from an economic point of view – generally remains, even when the number of consignments is increased and the number of products per consignment is reduced.

Conclusions

Based on the results of the cost benefit analysis, surveillance activities to identify and prevent unsafe goods entering the country via points of entry participating in the Safety at Ports project generates positive net benefits and is considered good value for money. Much of the benefit is derived from prevention of harm to consumers. For some of the newer projects (such as the London Gateway and Newcastle airport), the benefit cost ratios are likely to change as the activities at these points of entries increase and mature. In the case of the London Gateway, large growth is anticipated over the next few years and therefore the benefit cost ratio could be within the same range as that of Tilbury, Felixstowe and Southampton if they are able to replicate the same level of success.

¹ It should be noted, that costs are based on the fact that when one unsafe good is identified, the whole consignment of goods will need to be seized and destroyed. So for instance, with the cost of recall relates to a consignment, however it only takes the identification of one unsafe good to incur this cost.

The core basis of the analysis is contextually dependent on the level of surveillance and identification of unsafe and non-compliant goods required, which was provided by the Trading Standards at the time of interview. However measurement of these indicators was often not uniform across the Trading Standards, and therefore not robust. Future efforts around the Safety at Ports project need to focus on developing methods for consistent data collection and presentation using common data definitions. Future cost benefit analysis of points of entry included in the breakeven analysis will only be possible if at least a year's worth of robust data around surveillance, specifically volumes of high risk and unsafe goods being imported is collected.

The benefit cost ratios may be subject to uncertainty, as a result of the lack of consistency in data around volume of high risk and unsafe goods. Our sensitivity analysis, however, provides reassurance in that the conclusion of the analysis – i.e. that these programmes represent a good investment from an economic point of view – generally remains, even when the volume of unsafe goods identified is reduced.

2.0 Introduction

The National Trading Standards Board (NTSB) purpose is to provide leadership, influence, support and resources to help combat consumer detriment², locally, regionally and nationally and has set the following objectives to achieve this:

- **Objective 1** – Ensure effective governance arrangements for the delivery of national and cross boundary consumer protection activities
- **Objective 2** – Create systems to share intelligence more effectively and efficiently in order to identify and tackle emerging threats
- **Objective 3** – Ensure effective delivery of national and cross boundary enforcement projects
- **Objective 4** – Effectively coordinate and collaborate on all arrangements

In order to achieve Objective 3, to ensure effective delivery of national and cross boundary enforcement projects, the Safety at Ports Project was established with oversight from the Safety at Ports Governance Group.

The main aim of the Safety at Ports Project is to enforce consumer protection regulation at the source of the problem. The interception of dangerous consumer goods from countries outside the European Union (EU) at the point of entry is intended to prevent and reduce harm caused to people, business, and the economy by stopping unsafe and non-compliant products from reaching the market.

The NTSB has commissioned Matrix to perform an independent evaluation of risks and associated matters as they relate to product safety at points of entry in England, with a focus on the value for money of every pound spent at the point of entry to help inform the future delivery and effectiveness of the service.

The remainder of the report is structured as follows:

- Section 2 presents the methodology of the interviews and the economic model.
- Section 3 provides results from the interviews and the cost benefit analysis.
- Section 4 provides the conclusions
- Appendices provide further technical detail.

² The Office of Fair trading definition of consumer detriment is as follows: “where a customer suffers as a result of their dealings with an organisation, and where that suffering is partly or wholly the result of the organisation accidentally or deliberately treating the customer unfairly”

3.0 Methodology

The main aim of this study is to evaluate the Safety at Ports project in relation to the risks and associated matters of product safety at points of entry in England to help inform the future delivery and effectiveness of the service.

Two methods have been employed for the evaluation:

3. interviews with Trading Standards (TS) representatives currently involved with the Safety at Ports project; and
4. cost benefit analysis to estimate the value of every pound spent at the point of entry.

3.1 Interviews with Trading Standards representatives

The main objectives of the interviews with Trading Standards representatives were to:

- understand the processes involved in identifying unsafe goods at points of entry in England;
- understand the risks and associated matters as they relate to product safety at points of entry in England;
- assess the evolution and future expectations of risks to safety from unsafe goods; and
- gain insight as to the efficiency and effectiveness of operations at points of entry, with a view to improve safety.

Interviews were conducted with the 14 Trading Standards offices currently involved with the Safety at Ports project. This covers 12 points of entry across England. [Table 3](#) presents the points of entry and the associated Trading Standards office. Please refer to [Appendix 1](#) for the questionnaire used in the interviews with the Trading Standards representatives.

Table 3: Points of entry and associated Trading Standards office

Point of Entry	Trading Standards office
Felixstowe	Suffolk
Southampton	Southampton Hampshire
Heathrow	Hillingdon Hounslow Slough
London Gateway	Thurrock
Tilbury	Thurrock
Coventry postal hub	Warwickshire
Newcastle airport	Newcastle
Royal Portbury	North Somerset Bristol
Gatwick airport	West Sussex
Manchester airport	Manchester
East midlands airport	Leicestershire
Immingham docks	North East Lincolnshire North Lincolnshire

3.2 Cost-benefit analysis

The methodology for the cost-benefit analysis presented here builds upon previous analysis carried out by Matrix Insight (2009) for the Local Better Regulation Office (LBRO), which estimated the value for money of every pound spent on regulatory activity at Felixstowe, using a decision model. Increasingly, decision models are being used to inform ex-ante and ex-post evaluation of welfare interventions.

Decision models take as a starting point the theory or logic model for the intervention and build the relationships between inputs, process, outputs and outcomes to compare costs and benefits of different options. The models are populated using an array of different information, essentially to enable a synthesis of what is known about the topic within a framework that allows an informed assessment to be made about value for money (Shermilt et al, 2010).

The decision model for the previous analysis was based on the logic model for surveillance and mitigation activities carried out by Suffolk Trading Standards. This study aims to further develop the decision model by defining the logic models (see [Appendix 2](#)) at each point of entry covered by the Trading Standards currently involved in the Safety at Ports project and estimating the value for money for each point of entry. The cost-benefit analysis includes three components:

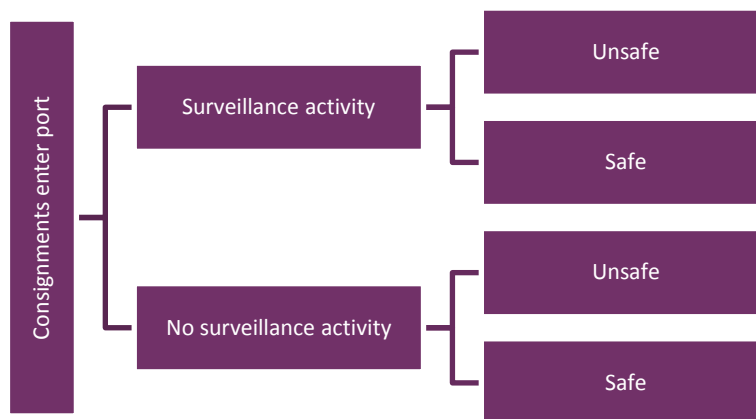
1. costs of inspection (essentially this is based on the NTSB budget for the safety at ports project as well as the distributed cost of the Single Point of Contact for risk profiling consignments);
2. the number of unsafe items identified; and
3. the size and value of expected impacts on local authorities and consumers if unsafe goods are identified through inspection by the Trading Standards office compared to the impacts if unsafe goods are distributed throughout the country.

[Figure 1](#) presents the basic conceptual framework used to compare the costs and impacts of the threat of the import of unsafe consumer goods entering the UK through a port. It compares two scenarios:

- Trading Standards office performs no market surveillance for goods arriving at port and unsafe goods are undetected: **the ‘do nothing’ scenario.**
- Trading Standards office performs market surveillance for goods arriving at port and detects unsafe goods: **the intervention scenario.**

This framework provides the basis for data collection and analysis and the outline for the cost-benefit model.

Figure 1: Simple Conceptual Model



Costs

The NTSB budget allocated to the Trading Standards offices for surveillance and inspection activities was used as the cost of the intervention. [Table 4](#) outlines the budget allocated to each Trading Standards office which was provided by the NTSB.

Cost related to the Single Point of Contact (SPoC) for profiling high risk consignments are estimated to be £200,000 and were provided by the Suffolk Trading Standards office. The costs of the SPoC for each point of entry were calculated based on the proportion of the total budget each point of entry received. For example, the proportion of the budget that is given to Tilbury is 2% (£11,000/ £467,765), therefore SPoC costs for Tilbury are 2% of £200,000 (£4,703).

It should be noted, that some points of entry currently do not use the SPoC system such as Coventry postal hub. However as the SPoC cost is a fixed cost, it has been proportionally distributed over all the points of entry for the analysis.

Table 4: NTSB budget by point of entry

Point of Entry	Trading Standards	NTSB budget	SPoC costs	Total
Felixstowe	Suffolk	£189,765	£81,137	£270,902
Southampton	Southampton Hampshire	£120,000	£51,308	£171,308
Heathrow	Hillingdon Hounslow Slough	£33,000	£14,110	£47,110
London Gateway	Thurrock	£44,000	£18,813	£62,813
Tilbury	Thurrock	£11,000	£4,703	£15,703
Coventry postal hub	Warwickshire	£11,000	£4,703	£15,703
Newcastle airport	Newcastle	£5,000	£2,138	£7,138
Royal Portbury	North Somerset Bristol	£11,000	£4,703	£15,703
Gatwick airport	West Sussex	£10,000	£4,276	£14,276
Manchester airport	Manchester	£11,000	£4,703	£15,703
East midlands airport	Leicestershire	£11,000	£4,703	£15,703

Point of Entry	Trading Standards	NTSB budget	SPoC costs	Total
Immingham docks	North East Lincolnshire North Lincolnshire	£11,000	£4,703	£15,703
Total		£467,765	£200,000	£667,365

Estimates of imports of unsafe goods

The Department for Business, Innovation and Skills (BIS) has issued guidance on Product Safety for Manufacturers³, which outlines the specific EU safety regulation requirements for a number of different types of industrial and consumer products. The types of imported goods can vary by point of entry depending on the season and demand. Based on the BIS guidance and from interviews with Trading Standards representatives, the majority of unsafe consumer goods can be classified as:

- Toys.
- Electrical products.
- Cosmetics.

The estimated number of high risk and unsafe consignments imported via each point of entry is based on data collected from interviews with the Trading Standards and also data dashboards collected by NTSB. The estimates are based on the number of SPoC notifications received by a point of entry. [Table 5](#) outlines the baseline level of high risk consignments. Where points of entry have been active for less than a year, volume of goods have been scaled up to reflect an annual amount. However, due to lack of data it should be noted that this scaling up does not make any adjustment for seasonal peaks. Estimates for the number of high risk goods imported via Manchester airport, East Midlands airport and Immingham docks are unavailable as at the point of interview had yet to start surveillance activities and as such this data were unavailable.

Table 5: Number of high risk goods by point of entry per annum

Point of entry	High risk
Felixstowe	5,325,600
Southampton	6,950,000
Heathrow	1,120,000
London Gateway	76,800
Tilbury	187,200
Coventry postal hub	124,800
Newcastle airport	13,200
Royal Portbury	14,400
Gatwick airport	34,340
Manchester airport	Not available
East Midlands airport	Not available
Immingham docks	Not available
Total	13,846,340

³ <https://www.gov.uk/product-safety-for-manufacturers>

Mitigation activities

If unsafe consignments are identified then mitigation activities occur. These accrue costs for the Trading Standards in terms of staff time spent working with importers and making sure that products are disposed of correctly. There are also costs associated with the loss of profit and the cost of storage and disposal for the businesses involved. In the model these are counted as impacts (or cost consequences) as they are not a cost paid by the regulatory system. [Table 6](#) presents the costs associated with mitigation activities by stakeholder.

Table 6: Mitigation costs by stakeholder (£2013)

Stakeholder	Cost per consignment	Source
Local authority	£639	Matrix Insight (2009)
Importer	£1,656	Interviews with Trading Standards

Impacts

The impacts of inspection are captured in two categories:

1. **Direct impacts to the LA.** The impacts to the local authority when in receipt of a customer or business complaint in relation to an unsafe product, i.e. the cost of Trading Standards activities if an unsafe item is imported through a point of entry, is not identified, and subsequently causes harm to a resident of the LA. This is estimated to be £1,347 per consignment and includes the cost of staff working with importers, dealing with recalls, seizing goods, storage and proper disposal. Costs associated with this activity were taken from Matrix Insight (2009) and inflated to 2013 prices. The model assumes that all LAs act at a similar level to any given incident.
2. **Indirect impacts to consumers:** The impacts to the consumer as a result of coming into contact with an unsafe good. For example the cost of the good to the consumer as well as unsafe items causing injury or harm to a consumer (see section below). The cost of a product to the consumer was estimated to be £3.29 and was taken from taken from Matrix Insight (2009) and inflated to 2013 prices.
3. **Indirect impacts to businesses:** The impacts to the business as a result of an unsafe good being identified in the market and subsequently being recalled. The costs to the business relate to the recall, storage, destruction of goods and are based on the probability that a good is recalled, which were estimated to £49,898 per consignment and are taken from Matrix Insight (2009) and inflated to 2013 prices. The probability of a product being recalled was estimated to be 2.21%. Please refer to [Appendix 3](#) for a detailed breakdown of the data and calculations associated with this probability.

Injuries and damages arising from unsafe goods

From interviews with the Trading Standards representatives, the most common types of unsafe goods that arrive from non EU countries are:

- Electrical goods, such as laptop and mobile phone chargers.
- Toys.

- Cosmetics, such as skin whitening creams.

Electrical goods and toys mainly arrive from the Far East, whereas cosmetics with safety issues generally come from Africa.

These types of goods pose a multitude of risks to consumer safety with varying severity of injury. The most common safety issues with electrical goods tend to be with the grade of plastic that is used to make the goods, and insufficient insulation around electrical component. These safety issues pose a serious shock risk, which could result in burns, electrocution and fires.

From interviews with product safety experts, the most common safety issues surrounding toys tend to be around the structural quality of the product, for example small parts of the toy falling off which present a choking hazard and flammability and toxicity issues. The harms related to toys are even more far reaching than electrical items, with common harms including choking; strangulation; ingestion of small parts; lacerations; burns, electrocution and fires; and long-term health problems such as cancer arising from toxic substances. A previous report by Matrix (2012) for the European Commission⁴ found that lead absorption from toys can lead to behaviour and attention problems and reduced IQ in children and estimated that the long-term economic costs of exposure to lead in toys are over €242m. These costs relate to: a reduction in health related quality of life (QALYs); an increase in health cost due to treatment; and a reduction in productivity.

From interviews with Trading Standards representatives and product safety experts, use of banned substances are the most common safety issue found with cosmetics and can result in long term health issues such as cancers.

Table 7 presents the costs associated with these types of injuries and harm. The costs have been taken from the Health and Safety Executive’s appraisal values for workplace accidents and ill health (2012)⁵ and the Economic Cost of Fire report by the Office of the Deputy Prime Minister (2006) and inflated to 2013 prices.

Table 7: Cost of injury and harm (£2013)

Injury/ Harm	Individual	Employers	Government	Total	Source
Serious injury	-£417	£3,853	£4,790	£8,122	HSE (2012)
Fatality	£1,379,777	£143,705	£118,713	£1,641,154	HSE (2012)
Fire	-	-	-	£30,353	Office of the Deputy Prime Minister (2006)

Note: Totals may not sum due to rounding

The costs of injury have been calculated based on the following categories:

- Net lost income, taking into account the offsetting of transfers from one party to another, e.g. benefits payments are a cost to Government, but an equal and opposite offsetting benefit to individuals.

⁴ http://ec.europa.eu/enterprise/sectors/toys/files/reports-and-studies/final-report-lead-in-toys-matrix-insight_en.pdf

⁵ <http://www.hse.gov.uk/economics/eauappraisal.htm>

- The cost of insurance, less compensation pay-outs to individuals.
- Production disturbance costs, such as cost of recruitment and work reorganisation.
- Health and rehabilitation costs, such as NHS costs.
- Administrative and legal costs, such as costs of administering benefits claims.

With Fatality, non-financial human costs are also included, which represents the value of 'human costs', sometimes described as 'pain, grief and suffering'.

The average cost of a domestic fire includes costs associated with the following:

- Fatalities
- Injures
- Property damage
- Criminal justice system
- Response of Fire and Rescue service

[Table 8](#) outlines the annual probabilities associated with harm caused by an unsafe good. Please refer to [Appendix 3](#) for a detailed breakdown of the data and calculations associated with the probabilities.

An assumption with the below probabilities, is that the products will fail within one year after purchase. This assumption was based on interviews with Trading Standards and product safety experts, where it was understood that when a product is unsafe, it will usually fail or cause harm within immediate use of the item. Given this expert information, this assumption is, we believe a reasonable one, and if this assumption holds, then results from the economic analysis are correctly stated. However if some products like toys, cause harm over a longer timeframe, the estimates from the economic analysis maybe overstated, however, we did not have access to data to enable us to perform this more sophisticated analysis.

Table 8: Probabilities associated with harm caused by an unsafe good

Harm	Probability
Accidental fire in dwellings caused by unsafe electrical appliances	0.06%
Major injury caused by unsafe product	0.07%
Fatality caused by unsafe products	0.0002%

Breakeven analysis

Some of the new pilot projects have yet to identify any unsafe goods. These projects relate to the following points of entry:

- Royal Portbury
- Gatwick airport
- Manchester airport
- East Midlands airport
- Immingham docks

For these, a breakeven analysis. A break-even analysis is based on the net benefit (the difference between total benefits and total costs). The formula for calculating the net benefit is:

$$\text{Net benefit} = (\text{impact} \times \text{value of impact}) - \text{cost}$$

By setting the net benefit to zero it is then possible to calculate the impact needed for the intervention's benefits to outweigh its cost. In this scenario, the impact would be the minimum number of unsafe goods identified and therefore prevented from entering the UK consumer market.

Cost is defined as the NTSB budget allocated to the point of entry and the proportional cost of the SPoC for risk profiling consignments.

In order to assign a monetary value to preventing unsafe goods entering the country as a result of surveillance, we estimated the average weighted costs associated with avoided:

- Mitigation activities by the Local Authority for goods reaching the consumer
- Harm to consumers from major injury, fatalities and fires
- Product recalls managed by retailers

Unit costs were weighted by the probability of the event occurring. Please refer to [Appendix 3](#) for a breakdown of the costs and probabilities used for each point of entry included in the breakeven analysis. [Table 9](#) presents the cost of the intervention and the weighted cost of an unsafe good for each point of entry.

Table 9: Costs by point of entry

Point of entry	Intervention cost	Weighted cost of unsafe good
Royal Portbury	£15,703	£1,135
Gatwick airport	£14,276	£1,118
Manchester airport	£15,703	£1,115
East Midlands airport	£15,703	£1,117
Immingham docks	£15,703	£1,135

One advantage with a breakeven analysis is that it indicates the minimum impact an intervention needs to achieve in order for it to start generating positive economic benefits. However, it is important to note that the estimates calculated can only be used for illustrative purposes, and do not reflect the actual or desired impact of the projects or the feasibility of achieving the necessary impacts but rather it provides a target for the Trading Standards to achieve.

4.0 Results

4.1 Overview of the Safety at Ports Project

The Safety at Ports Project was originally managed by the Local Better Regulation Office (LBRO), who allocated budget to Trading Standards in Suffolk and Southampton for enhanced sampling and testing of imported consumer products. Since March 2012, the NTSB are responsible for the management of the Safety at Ports Project.

The objective of the Safety at Ports Project is to enforce consumer protection regulation at the source of the problem. The interception of dangerous goods at the point of entry aims to prevent and reduce harm caused to people, business, and the economy by stopping unsafe and non-compliant products from reaching the market.

In 2013, additional funding was made available for new pilot projects to assess the extent to which unsafe goods enter these points of entry. [Table 10](#) presents the Trading Standards that are currently involved in the Safety at Ports project and how long they have been involved with the project.

Table 10: List of Trading Standards by Project Initiation date

Trading Standards	Project initiation date
Suffolk	Since start of project
West Sussex	Since start of project
Slough	2009
Southampton	2010
Hampshire	2011
Thurrock	January 2013
Manchester	June 2013
Hillingdon	August 2013
Hounslow	August 2013
Warwickshire	August 2013
Leicestershire	August 2013
Newcastle	November 2013
North Somerset & Bristol	October – November 2013
North & North East Lincolnshire	January 2014

Most Trading Standards follow the same process to identify unsafe goods, with the new projects basing their process on the Suffolk Trading Standards model, as this model is seen as best practice (see [Figure 2](#)). However depending on the type of port (sea, air or postal hub), the surveillance and mitigation activities vary ([Appendix 2](#)).

The starting point of the surveillance activities of the Trading Standards is the intelligence on high risk consignments originating from the Single Point of Contact (SPoC) based in Suffolk.

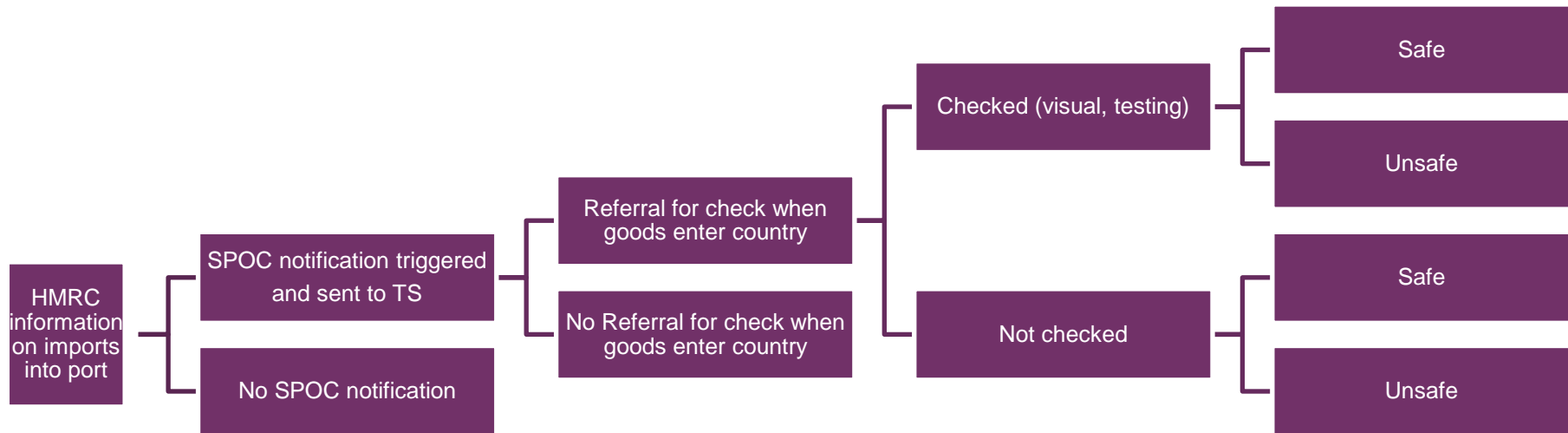
The SPoC plays a key role in the mitigation process to identify unsafe goods. The SPoC receives information about goods entering the UK from the National Clearance Hub (NCH) administered by HMRC. The SPoC has five key tasks:

- Maintaining the product safety intelligence hub (non-food products).
- Setting-up and managing profiles for unsafe importers and products.
- Disseminating 'hits' to the relevant market surveillance authority having determined whether each meets the criteria to be held for sampling.
- Follow up activities.
- Feeding information into national and European activities.

The SPoC has developed profiles about goods that are at risk of being unsafe based on their own knowledge, historical data and data provided by TS. Each profile contains the product type, country of origin and other key information about the imported goods. This information comes from the HM Revenue & Customs (HMRC) Customs Handling of Import and Export Freight (CHIEF) database which holds information about all goods imported into the UK via a sea or airport. The SPoC scans the CHIEF database with the profiles to select certain consignments that may contain unsafe goods coming through each sea or airport and sends it off to the appropriate TS.

This information is further risk assessed by the TS. For larger ports such as Felixstowe and Southampton the Trading Standards responsible conducts a further analysis of the data and compares the notification with other international (RAPEX, ICSMS) or regional databases they have about unsafe goods (CNS, TS interlink database). If Trading Standards have a large amount of notifications they may then decide, based on this information and officer capacity, to check only a sample of the consignments that may contain unsafe goods. From visual checks, a certain amount of goods may be seized immediately, because the goods are obviously unsafe (i.e. cosmetics that contain banned substances), other goods might need to be examined further (i.e. electrical goods) and are sent for a lab test. If a good is found to be unsafe, it is then stored until it can be destroyed. Further mitigation work with the inland authority where the importer is based takes place so that other potentially unsafe consignments can be identified before entering the consumer market.

Figure 2: Suffolk Trading Standards process map



[Table 11](#) provides a summary of the activities taking place in each Trading Standards involved in the Safety at Ports project.

Table 11: Summary of the activities for Trading Standards involved with the Safety at Ports project

Point of entry	Trading Standard	Summary
Felixstowe seaport	Suffolk	<p>Suffolk Trading Standards is responsible for product safety surveillance activities for goods that arrive at Felixstowe Seaport. Suffolk Trading Standards has been carrying out checks to identify unsafe goods at this port for over 20 years and has been involved with the Safety at Ports Project since it started.</p> <p>In 2012, 3,75 million consignments or 42% of UK container traffic came through Felixstowe, making it one of the largest points of entry in the UK. Most unsafe products that arrive at this port are toys, electrical appliances, smoke alarms, LED lights, chainsaws and dental equipment, with most unsafe products arriving from the Far East. NTSB has allocated £189,765 for surveillance and mitigation activities at Felixstowe seaport. Currently, of the goods being sampled, 78% are identified as unsafe.</p>
Southampton seaport	Southampton Hampshire	<p>Southampton Trading Standards is part of the regional group Trading Standards South East Limited and are responsible for the product safety of goods that arrive at the Seaport of Southampton. They have been involved with the Safety at ports project since 2010. Hampshire Trading Standards has been actively involved with the process since 2011. After Felixstowe, Southampton is one of the largest points of entry in the UK, with 20% of UK container traffic arriving at this port.</p> <p>Southampton Trading Standards receive all SPoC notifications for the consignments that arrive in Southampton, however a small number of consignments that arrive at Southampton are sent directly to Hampshire Trading Standards for checks and therefore Southampton Trading Standards liaise with Hampshire trading standards to have the relevant SPoC notifications sent on to them (see Appendix 2, Figure 4 for Southampton process map).</p> <p>Both Southampton and Hampshire Trading Standards have access to the Community Network Services (CNS compass) database operated at Southampton Port. The Community</p>

		<p>Network Services (CNS) operates dedicated inventory control systems for both the port and air courier industries, covering Southampton, Tilbury, Port of London, Heathrow, Gatwick, Manchester, Birmingham, Immingham, Belfast and Portsmouth. The CNS database is used in addition to the SPoC process to identify potentially unsafe goods.</p> <p>The most common types of unsafe goods identified in Southampton are toys and electrical goods (chargers and adapters). Hampshire has also identified unsafe chainsaws with most unsafe goods arriving from China.</p> <p>As a result of funding from the NTSB (£120,000), in 2013 it was estimated that 350,000 unsafe goods were identified by Southampton and 3,500 were identified by Hampshire Trading Standards and thus were prevented from entering the UK consumer market.</p>
<p>Heathrow airport</p>	<p>Hillingdon Hounslow Slough</p>	<p>The Trading Standards associated with Heathrow airport form part of the London Trading Standards Authorities (Hillingdon, Hounslow) and Trading Standards South East Limited (ERTS in Slough and Surrey). These Trading Standards (apart from Slough) are new pilot projects which have been in operation since summer 2013 and are responsible for goods that arrive at Heathrow airport (see Appendix 2, Figure 5 for Heathrow airport process map). The allocation of consignments arriving at Heathrow to the different Trading Standards is predetermined by HMRC and the importer before arrival into the country. Slough has been involved with the Safety at Ports project since 2009. The initiation of these pilot projects was to gain insight into the extent to which unsafe goods are being imported through Heathrow and to estimate the level of surveillance that is required for this airport.</p> <p>From August until October 2013, training for personnel and relationship building with the appropriate regulatory bodies such as HMRC, was the main focus for Hillingdon TS. Since October 2013 the SPoC profiles for Heathrow Airport went live, allowing Hillingdon, Hounslow and Slough to start the surveillance activities. However previous to the profiles going live, some surveillance activity was performed by Slough as they have a number of ERTS.</p>

		<p>The main types of unsafe goods entering Heathrow Airport are lightweight, high quality goods-mainly cosmetics (such as skin lightening creams coming from Africa).</p> <p>NTSB has allocated £33,000 for the Heathrow projects which is shared amongst the three TS. However Slough also receives additional money from the TSSE budget, and to date has spent already £7,600 for product safety surveillance and mitigation activities. Hillingdon Trading Standards has checked 6 consignments and found 2 to be unsafe. Slough checked 3 consignments and found 20,000 unsafe goods.</p>
<p>London Gateway seaport Tilbury seaport</p>	<p>Thurrock</p>	<p>Thurrock Trading Standards has been involved with the Safety at ports project for one year and has been actively running surveillance activities to identify unsafe goods for 2 months for Tilbury and the London Gateway points of entry. The process to identify unsafe goods follows the Suffolk Trading Standards model (see Appendix 2, Figure 6 and Figure 7 for London Gateway Seaport and Tilbury Seaport process maps).</p> <p>Currently it is estimated that 10% of all consumer goods enter the UK via the London Gateway and Tilbury. The most common types of unsafe goods identified coming through these ports were toys, cosmetics and electrical goods, arriving from China. However there are plans to expand this point of entry to become one of the largest in the EU.</p> <p>NTSB has allocated £55,000 to Thurrock, £11,000 of which is to cover Tilbury and £44,000 is for the London Gateway.</p> <p>Since the projects became active, 24 consignments have been checked and 2 consignments containing 23 types of unsafe goods have been prevented from entering the UK consumer market.</p>
<p>Coventry postal hub</p>	<p>Warwickshire</p>	<p>Warwickshire Trading Standards has been involved with the Safety at Ports project since August 2013 and are responsible for goods that come through the Coventry postal hub (see Appendix 2, Figure 8 Coventry postal hub logic model). UK Border Force assists Warwickshire by scanning (x-ray) the parcels that are at risk of being unsafe and passing them on to the Trading Standards for further checks.</p>

		<p>The type of unsafe goods arriving at the postal hub are mainly small electrical appliances, hair straighteners, cosmetics, some toys and car parts (small air filters, service parts, which are counterfeit and unsafe). These goods usually come from Africa and the Far East (mainly China).</p> <p>NTSB have allocated £11,000 for this project and on average Warwickshire Trading Standards checks 24 parcels and identifies 3 parcels as unsafe per week.</p>
Newcastle airport	Newcastle	<p>Newcastle airport is a new pilot project and has been active since January 2014. Goods coming through Newcastle Airport are checked by Newcastle Trading Standards (see Appendix 2, Figure 9 for Newcastle Airport process map).</p> <p>The type of unsafe goods that arrives at Newcastle airport are mainly electrical appliances and cosmetics, with goods usually arriving from Dubai. NTSB have allocated £5,000 for this project. Although this project at Newcastle Trading Standards has only been active for a short time, they have successfully identified 200 goods that have safety issues.</p>
Royal Portbury seaport	North Somerset Bristol	<p>North Somerset Trading Standards has been involved with the Safety at Ports project since the October-November 2013) and is responsible for goods entering through Royal Portbury (see Appendix 2, Figure 10 for Royal Portbury Trading Standards process map). The SPoC risk profiling system is currently being developed, so surveillance activities of Trading Standards officer's centres around manifests (inventory of containers on a particular ship) that are emailed to the Trading Standards for risk assessment. However North Somerset Trading Standards have found that there are a limited amount of containers with goods that may have product safety issues.</p> <p>NTSB have allocated £11,000 for this project and to date, 3 consignments have been checked, with no product safety issues detected. As a result of this project, officers have established good relationships with the port staff and are working on "good will" to get storage and access to containers. Official procedures for access to consignments and storage for checks at the port are currently in development.</p>

<p>Gatwick airport</p>	<p>West Sussex</p>	<p>West Sussex Trading Standards has been involved with the Safety at Ports project since the beginning of the ports project and is responsible for goods coming through Gatwick airport (see Appendix 2, Figure 11 for Gatwick process map).NTSB have allocated £10,000 for this project. West Sussex Trading Standards receive intelligence from the SPoC and intelligence based on surveillance activities performed by UKBF and port health at Crawley Borough Council. This intelligence coming from UKBF and port health is sent to West Sussex Trading Standards to aid them with the identification of unsafe goods. In 2013 all unsafe goods were identified through these channels as there was an issue with the SPoC system. West Sussex Trading Standards aim to bring the SPoC system back up and running as soon as possible.</p>
<p>Manchester airport</p>	<p>Manchester</p>	<p>Manchester Trading Standards has been involved with the Safety at Ports project since June 2013 and is responsible for goods coming through Manchester airport see (Appendix 2, Figure 12 for Manchester Airport process map).</p> <p>NTSB have allocated £11,000 for this new project. The aim of the project is to estimate the extent to which consignments entering via Manchester airport have product safety issues and to begin surveillance activities to prevent unsafe products from entering the UK. Manchester Trading Standards are keen to start surveillance activities as soon as possible and are actively engaged with UKBF to develop procedures to gain access to consignments for surveillance and mitigation activities.</p>
<p>East Midlands airport</p>	<p>Leicestershire</p>	<p>Leicestershire Trading Standards has been involved with the Safety at Ports project since August 2013 and is responsible for goods coming through East Midlands airport (see Appendix 2, Figure 13 for East Midlands Airport process map).</p> <p>NTSB have allocated £11,000 for this new project. The aim of the project is to estimate the extent to which consignments entering via East Midlands airport have product safety issues and to begin surveillance activities to prevent unsafe products from entering the UK. Leicestershire Trading Standards are keen to start surveillance activities as soon as possible</p>

		and are actively engaged with UKBF to develop procedures to gain access to consignments for surveillance and mitigation activities.
Immingham docks	North East Lincolnshire North Lincolnshire	<p>North East Lincolnshire Trading Standards has been active in the Safety at Ports project since January 2014 and is responsible for goods coming through Immingham docks (see Appendix 2, Figure 14 for Immingham docks process map).</p> <p>NTSB have allocated £11,000 for this new project, which began activities in January 2014. The aim of the project is to estimate the extent to which consignments entering via Immingham docks have product safety issues and to begin surveillance activities to prevent unsafe products from entering the UK. It is too early to draw any conclusions as to the extent to which unsafe goods are entering the country via this port and effectiveness of surveillance and mitigation activities of the Trading Standards.</p>

4.2 Risks, challenges and threats

This section outlines the current and potentially arising risks, challenges and threats in relation to product safety at points of entry in England as raised by Trading Standards representatives from the Safety at Port project. It is important to note that the themes are often interrelated and therefore should not be viewed in isolation.

Funding and capacity

All Trading Standards stress that the current funding they receive from the NTSB is vital to enabling surveillance and mitigation activities to take place and that without this funding they would not be able to carry out this work. However Trading Standards form part of the LA and are affected by their decisions and strategic vision. Several Trading Standards expressed concern that due to recent cuts in public sector funding there is a risk that LA priorities may shift away from product safety and as such affect their ability to fulfil their remit.

As a result of the Safety at Ports project many Trading Standards now have more information about the extent to which unsafe goods are being imported into the country. Many ports feel that the current SPoC notifications are very effective to identify unsafe goods but they are constrained by lack of capacity to check all high risk consignments that are identified for checks. The amount of SPoC notifications that is sent on to a Trading Standards is also determined by the available capacity.

Two Trading Standards raised the issue that they receive many SPoC notifications all of which cannot be checked and therefore Trading Standards can only select a small sample for surveillance. Three Trading Standards stated that even though currently their capacity is sufficient for the amount of high risk consignments that need to be checked, they envisage that there could be bottlenecks in the amount of high risk goods that come into the country, driven by seasonal demand (such as during the summertime and Christmas) but also by expansion of some points of entry. However many Trading Standards state with more funding or even if capacity could be shared amongst Trading Standards when peaks and bottlenecks occur, they would be able to cope with increases in high risk consignments identified and perform more checks.

Capacity Planning

Two Trading Standards with large ports of entry stress that although there is an intelligence system in place from the SPoC, capacity planning is a challenge. Generally Trading Standards know that they need more capacity around the summer months and Christmas, but outside of these seasons, it is difficult to predict when other peaks will occur.

Another issue facing Trading Standards with regards to capacity planning is that some importers may import mixed product consignments, with only some of the product types classed as high risk. One Trading Standards stated that companies from outside the EU may import up to 1,500 containers a year and one container can contain up to 100,000 goods potentially of many different product types. In these circumstances it can be it can be physically difficult to access the goods in the container for inspection. As such officers may only be able to inspect

and test only a few of the different product types, before releasing the entire container, especially where working alone.

Capacity planning is difficult because of the limited timeframe the Trading Standards has available to examine the goods. One Trading Standards stated that they have two hours to decide whether or not the goods will be examined and after that they have three days to inspect the goods. One Trading Standards stressed that the timeframe to identify and check goods at the point of entry before they are distributed to importers is very short, thereby restricting the number of checks they are able to carry out.

Storage facilities

Some LAs have many Enhanced Remote Transit Storage (ERTS) where the imported goods are temporarily stored by freight agents till the goods are cleared. The local Trading Standards performs safety checks on high risk goods stored in the ERTS. However many Trading Standards have found that within their LA or at the point of entry, storage facilities are not sufficient and may often be shared by other authorities such as UK Border Force. Two Trading Standards found that the infrastructure they have access to for holding goods for inspection or storing unsafe goods after they have been identified is often insufficient. One of these Trading Standards stated that for their point of entry, goods arrive day and night and there is not always enough time to examine the goods as there may not be enough storage available or some goods are automatically cleared by HMRC, picked up and taken to the destination without an examination of the goods.

Another Trading Standards raised the issue of uneven distribution of storage, with an example that there can be many ERTS clustered in one LA compared to another LA which covers the same port. Access to storage is seen to directly impact the amount of high risk consignments that can be checked, as the amount of sampling that can take place would take into account not only officer capacity from the Trading Standards but also available storage. As a result if either resource is not sufficient, high risk consignments have to be released and sent on to its destination. High risk consignments will only be sent on if the inland authority takes responsibility for it.

Human resources

There have been many new pilots projects introduced to the Safety at Ports projects since summer 2013 and some are still in development with regards to gaining the necessary knowledge and experience to carry out surveillance and mitigation activities. Even though training is provided to officers of the new projects, many feel that hiring people with the relevant skills and experience within product safety is challenging. Trading Standards from the pilot projects do feel surveillance activities for their points of entry are beneficial, with some preventing thousands of unsafe goods from entering the country, and believe that with continued funding from the NTSB they can build on the work they have done so far and develop their knowledge further.

Administration

Generally most Trading Standards receive information about high risk consignments from the SPoC. All Trading Standards believe that high risk profiling from the SPoC is a vital for their surveillance activities with some of the larger ports further risk profiling SPoC notifications with intelligence from other local, national or international databases. There are currently many different databases used by Trading Standards for this purpose such as RAPEX, ICSMS and CNS to report and track unsafe goods that have been identified.

Although these databases are all found to be useful and up to date, many Trading Standards expressed that there is not a co-ordinated approach to using and updating information contained in some databases (for example the Trading Standards database and MEMEX) with one Trading Standards raising the issue of lack of information available centrally when unsafe goods are detected inland. As a result, Trading Standards spend more time contacting different parties such as inland authorities to help with their surveillance activities. The time spent contacting the different parties has an implication on the time allocated to check these goods, as usually goods can only be stored for a short while before they have to be released. This tends to be dependent on how much available storage there is either at the point of entry or the ERTS.

Another constant challenge faced by some Trading Standards is that the information declared by the shipping or freight agents is not specific enough or inaccurate. One Trading Standards raised the issue that instead of declaring phone chargers as such, they are declared as electrical items, which might not be picked up by the SPoC as a potentially unsafe consignment. One Trading Standards also highlighted that if chainsaws are declared as industrial machinery instead of consumer machinery they are not picked up by the SPoC who is looking for chainsaws for consumer use. Essentially the importers are evading the surveillance systems in place to identify specific types of goods and hence these goods could potentially enter the UK consumer market unnoticed.

Prosecution of importers

There are stringent surveillance activities in place in Trading Standards to detect unsafe goods and non-compliant goods. However due to the enormous amount of goods entering the larger ports every year, there is the risk that unsafe products enter the UK consumer market. Usually, goods are unsafe due to cheap production methods and low quality materials being used, these low cost products tend to be sold for a higher price, resulting in the large profit margins.

Most of the Trading Standards interviewed stated that when unsafe goods are identified, usually the cost of the mitigation activities falls upon the importer. These costs include storage and destruction of the unsafe goods. One Trading Standards raised the issue that because profit gains for the importer when these unsafe products are sold in the UK are so high, importers may accept the costs associated with the destruction of a consignment of unsafe goods.

The Trading Standards suggested if importers were faced with large penalties in addition to paying for the destruction of the goods, this may discourage them from importing unsafe goods. However the Trading Standards stated that there are many difficulties with implementing large fines against these importers and often because the goods haven't entered the market, it is difficult to initiate prosecutions. However if unsafe goods are identified inland, prosecution can

be initiated, usually by inland authorities, with many of these prosecutions resulting in a positive outcome.

Internet Trade

As the nature of business is changing towards more trade over the internet, Trading Standards are concerned that an increasing amount of high risk products that are purchased online are imported via postal hubs and fulfilment houses (for more information on these, see section on Postal imports). Many Trading Standards feel that this form of trade is expanding, posing an increase in threats to product safety. One of the Trading Standards mentioned this might be the case because it is cheaper to send smaller quantities via parcel than container.

One Trading Standards raised a concern that national and international law is perhaps not strong enough to prevent certain goods being sold via the internet. The problem with goods sold via the internet is that legally there has to be a responsible person for the product in the EU, therefore the responsibility of the unsafe good falls on the buyer.

Two Trading Standards recognise that fulfilment houses in their area pose a particular upcoming threat. Fulfilment houses store goods that are often purchased by individuals on trading websites such as eBay. Because these goods are ordered online and the importers are from outside the EU and are not directly in contact with those goods, the fulfilment houses work as distributors. Most goods stored in fulfilment houses are expected to be unsafe, but because of ownership issues for the goods, mitigation activities are difficult to carry out.

Postal imports

One Trading Standards mentioned that because of the nature of postal packaging, surveillance and mitigation activities have always been challenging. Currently packages are selected on the basis of country of origin and with the help of UKBF, packages are scanned and risky packages are referred to the TS.

Challenges arise because no specific information is available about the importer of the postal packages or specific information about the contents of the packages when they enter the postal hub. The only information that they have to risk assess on is the country of origin, size and weight of the package. This directly impacts SPoC profiles being generated and therefore hinders intelligence being sent to the Trading Standards about high risk goods arriving at the postal hub, resulting in difficulties in identifying unsafe goods.

One Trading Standards raised the issue that as more robust surveillance checks are put in place in more points of entry including postal hubs, importers of high risk packages may import via points of entry with less robust checks or even via private courier services.

UK Border Force

There is a delicate relationship between two Trading Standards and UK Border Force. These Trading Standards have raised the issue that there is not enough collaboration from UK Border Force with gaining access to high risk consignments for inspection. However as a result of the Safety at Ports project, doors are opening for new working relationships to be formed between

the two agencies, with discussions taking place around how they can work together to put processes in place to allow Trading Standards to carry out surveillance activities to tackle the problem of unsafe imports.

Counterfeit Goods & Food safety

Currently Trading Standards surveillance focuses on the non-compliance and safety aspect of a product with breaches in intellectual property being a secondary factor. However, it remains unknown as to how much of a risk counterfeit products actually pose. Some Trading Standards say counterfeit products tend to be produced to a very high standard, so as to look “genuine”. However One Trading Standards particularly found many counterfeit products (such as air filters and service parts) to be unsafe. It is not known how many counterfeit goods tend to be unsafe, as when Trading Standards record the results of their surveillance activities, goods would be classified as unsafe rather than counterfeit and unsafe.

It is recognised by the NTSB that safety, at a broader lever, of all imported goods through ports of entry in England and Wales needs to be more joined up and that there is a great opportunity for agencies to work together to prevent unsafe imports of all kinds entering the country. As such, from July 2013, NTSB has been given funding by the Food Standards Agency (FSA) to set up a new delivery process for funding animal feed inspection and sampling activities in England to commence in April 2014. This new mechanism will distribute £3.1 million, via regional delivery plans, to each local authority of which £300,000 of the funding is specifically to fund activities at port for imported feed and will fund manifest checks, identity checks and sampling at ports of animal feeding stuffs. Part of the NTSB agreement with the FSA for 2014-2015 is for the NTSB to undertake a number of projects to develop this work to ensure LAs deliver better quality and more effective working. For imports this will take the form of developing a consignment risk assessment model which will be used to better direct the funding to those types of port/import which pose the greatest risk. NTSB will also be asking regions to undertake a mapping exercise to identify all ports, hubs and wharves where animal feed is being imported.

4.3 Involvement of Inland authorities for Product safety

Co-ordination between Trading Standards and Inland authorities

As a result of the Safety at Ports Project there are many indirect beneficial effects, in addition to preventing unsafe goods from entering the UK. One of the core added values of the Safety at Ports Project is that it facilitates relationships and knowledge sharing between Trading Standards about unsafe goods and sharing of best practice.

Trading Standards share information amongst each other about unsafe goods that they identify by using databases such as ICSMS, TS Interlink (i.e. Newcastle Trading Standard, North East Lincolnshire Trading Standard) and RAPEX. Both Southampton Trading Standards and Hampshire Trading Standards have access to the Community Network Services (CNS compass) database operated at Seaport Southampton. However, because most databases are not regularly updated (it is not mandatory for Trading Standards to update information on the

databases) this knowledge base can only be used for historic purposes when investigating a case.

When unsafe goods have been identified by the Trading Standards as part of the mitigation process to prevent further unsafe goods entering the UK, the Trading Standards always notify the inland authorities where the importer of the goods is based about the unsafe goods they are trying to bring in to the country. This communication allows the inland authorities to make contact with these importers and to seize any unsafe goods that may have made it into the country. In addition, they can carry out further checks for other unsafe goods in those businesses. Some inland authorities actively feed intelligence to Trading Standards with a port about unsafe goods. Inland authorities also provide feedback on their follow up activities related to the information they received from the Trading Standards with a port.

Overall, feedback has been positive about the communication between Trading Standards and inland authorities, with both parties actively updating each other on importers or goods which they may need to be vigilant about. However there is not much cross over in mitigation activities between these two parties, with each conducting their own risk assessments, sampling, testing and destruction of unsafe goods. However in instances where potentially unsafe goods are being tested and have to be released before test results are returned, Trading Standards and inland authorities work together to ensure there is a smooth transition of the investigation.

4.4 Recommendations for improvements

From interviews with the Trading Standards representatives, the following suggestions for improvements were made to combat the risks that have been outlined in the previous section:

- **Continued funding from NTSB:** The general consensus amongst the Trading Standards is that if NTSB funding were not available, they would not be able to undertake product safety surveillance and mitigation activities. Trading Standards recommend that funding should be continued, with pilot projects feeling that this work is making a difference and would like to continue to build upon the foundations that have been set in place as a result of this project. NTSB should be mindful that funding decisions should not be unduly influenced by volume arguments as this research shows the value of a Trading Standards presence at all border points to mitigate the possibility of diversion.
- **National approach to product safety:** There is already a vast network established amongst Trading Standards, between Trading Standards and the SPoC and between Trading Standards and other regulatory bodies. This has been crucial for the success of the Safety at Ports project. To increase the impact of the Safety of at Ports project a national approach for product safety is needed. This could include a national budget for product safety surveillance and mitigation activities and shared capacity and storage facilities for Trading Standards which are responsible for the same point of entry or who are geographically close to each other.
- **Streamlining intelligence databases:** the current administrative process with different databases is of great importance to monitor information regarding imported unsafe

goods. This also helps the Trading Standards and the SPoC to develop risk profiles. However, it requires a lot of time to complete the various databases. This could be greatly improved if there was a more standardised or streamlined administration in place.

- **Development of a common data management system:** Generally Trading Standards representatives had a good idea of the results of their surveillance activities, but there was not a common platform used by all. The risk is that different Trading Standards may be using different definitions for key data items, or else are not accurately capturing data. Data dashboards were implemented by NTSB for Felixstowe and Southampton, but are currently being refined so that the task of data collection is more manageable and transparent. Developing common data collection methods is crucial for monitoring performance and will allow for points of entry to be analysed and compared against each other. This in turn will help decision makers identify trends and allocate budget accordingly
- **Increased collaboration with other agencies responsible for product safety:**
 - **UK Border Force:** Many Trading Standards have excellent relationships with UK Border Force. However due to an increased number of points of entry receiving funding from the NTSB for surveillance activities, issues have arisen between some Trading Standards and UK Border Force. However the two parties should continue to build on the new working relationships forming as a result of the Safety at Ports projects, as there are many benefits that can be obtained, as experienced by other ports working very closely with UK Border Force officers. One of the main benefits is around unsafe goods that are counterfeit, as one trading standards representative stated that in this situation, it is quicker and less costly to have the goods seized by UK Border Force for breaches in intellectual property, than it is to have the unsafe counterfeit goods tested for safety and then subsequently stored and destroyed. This collaboration serves to ultimately protect consumers from these potentially dangerous goods.
 - **Food Standards Agency (FSA):** As a result of funding given to the NTSB to develop risk assessment models for surveillance activities for animal feed imported via points of entry around the country, there are opportunities for efficiency gains to be made from Trading standards officers and representatives from the FSA working together and sharing knowledge. These collaborations should be strongly encouraged to increase the effectiveness of surveillance activities taking place at points of entry around the country and potentially reduce the costs of these activities by identifying synergies in processes and sharing resources where available.

4.5 Results of the cost benefit analysis

This section presents the results of the cost benefit analysis. Results for one year were generated as follows:

- The estimates of the costs of unsafe goods entering the country generated through the economic model were taken as the '**do nothing**' scenario.

- The **intervention** scenario was generated by estimating the impact of surveillance activities for unsafe goods for points of entry in England and the associated costs.
- The difference between the 'do nothing and the intervention scenarios represents the potential economic contribution of surveillance at the points of entry.

Impact of unsafe goods entering the consumer market

Matrix estimated the costs associated with unsafe goods entering the consumer market, the 'do nothing' scenario, for three different perspectives:

- Local authorities – the costs associated with mitigation activities to remove unsafe goods from the market after identification.
- Consumers – the costs associated with harm experienced from an unsafe good. These mainly stem from fatalities, serious injury and fires
- Retailers – the costs associated with recalling from sale and destroying unsafe goods.

Table 12 presents the potential level of unsafe goods entering the different points of entry in England, in the absence of surveillance activities. This data came from a mixture of interviews with Trading Standards representatives and NTSB data.

Table 12: Potential level of unsafe goods entering country by point of entry

Point of entry	Number of unsafe goods
Felixstowe	4,153,968
Southampton	4,256,382
Heathrow	373,333
London Gateway	17,723
Tilbury	43,200
Coventry postal hub	15,600
Newcastle airport	4,400
Total	8,864,607

Table 13 presents estimates of the cost of unsafe goods in the absence of surveillance activities by Trading Standards, by stakeholders in 2013. The results indicate that:

- The value of the impact to society of unsafe goods if no surveillance activities are performed is estimated to be £281 million.
- The major impact is on Consumers and is estimated to be £273 million. This cost relates to the impact of major injuries, fatalities and fire that are as a result of unsafe goods.
- The second largest impact was on the cost to the Retailers in terms of recalling items that are unsafe has been estimated to be £6 million.

Table 13: Costs of unsafe goods by sector (in £millions, base price 2013)

Sector	Cost
Local authority	£2
Consumer	£273
Retailer	£6

Sector	Cost
Total	£281

Preventing unsafe goods entering the consumer market

Based on the methods outlined in [Section 3.2](#), Matrix estimated the costs associated with surveillance activities for identifying unsafe goods at the different points of entry, the ‘intervention’ scenario, but also the costs of mitigation once unsafe goods have been identified which fall on the:

- Local authority - the costs associated with time spent by Trading Standards officers working with importers to have the unsafe goods destroyed
- Importers – the costs associated with storage and disposal of goods, as well as lost profit.

Even though surveillance activities take place in the ‘intervention’ scenario, not all high risk consignments can be sampled and checked, therefore there are still costs associated with unsafe goods not identified and thus entering the consumer market. As outlined in the previous section, these costs fall on the Local authorities, consumers and retailers.

The two main return on investment metrics calculated in this analysis are net benefit and the benefit cost ratio (B:C ratio). Net benefit is the difference between the total benefit generated by the intervention and its cost. Any value above zero, is deemed to be a good return on investment. The B:C ratio is the ratio of the total benefit generated by the intervention and its cost and can be interpreted as value for money and a worthwhile investment if the ratio is greater than 1. The larger the B:C ratio, the greater the return on investment.

The results for Felixstowe are as follows:

- The total cost of surveillance for goods coming through Felixstowe is £270,902. This includes NTSB budget provided to Suffolk and a relative proportion of costs associated with SPoC activities.
- The programme was estimated to prevent 438,048 unsafe goods entering the country.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £23,318.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £783,453.
- The total cost savings are estimated to be £13.5 million.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £13.3 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £50 to society in return, which shows the programme is value for money.

Table 14: Cost benefit analysis for Felixstowe

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			

	Without surveillance	With surveillance	Benefits (Cost savings)
Surveillance	£0	£189,765	
SPoC	£0	£81,137	
Total	£0	£270,902	
Impacts			
Local authority	£1,990,687	£2,014,005	-£23,318
Consumer	£132,167,596	£118,230,139	£13,937,457
Retailer	£3,823,702	£3,420,481	£403,220
Importer	£0	£783,453	-£783,453
Total	£137,981,984	£124,448,078	£13,533,906
Net benefit			£13,263,004
Benefit-cost ratio			£50

The results for Southampton are as follows:

- The total cost of surveillance for goods coming through Southampton is £171,308. This includes NTSB budget provided to Southampton and a relative proportion of costs associated with SPoC activities.
- The programme was estimated to prevent 350,000 unsafe goods entering the country.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £44,071.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £251,364.
- The total cost savings are estimated to be £11.10 million.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £10.91 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £65 to society in return, which shows the programme is value for money.

Table 15: Cost benefit analysis for Southampton

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£120,000	
SPoC	£0	£51,308	
Total	£0	£171,308	
Impacts			
Local authority	£304,552	£348,622	-£44,071
Consumer	£135,426,133	£124,178,756	£11,247,377
Retailer	£1,493,818	£1,364,448	£129,370
Importer	£0	£251,364	-£251,364
Total	£137,224,502	£126,143,190	£11,081,312
Net benefit			£10,910,004
Benefit-cost ratio			£65

The results for Heathrow are as follows:

- The total cost of surveillance for goods coming through Heathrow is £47,110. This includes NTSB budget provided to Heathrow and a relative proportion of costs associated with SPoC activities.
- The programme is estimated to prevent 180,000 unsafe goods entering the country. It should be noted, that at the point of analysis, surveillance for Heathrow had only been active for 3 months, and therefore this estimate has been scaled up on a pro rata basis to provide an annual estimate. We recognise that there are likely to be seasonal effects, but in the absence of any further data, we have unable to reflect these in this adjustment.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £5,494.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £25,755.
- The total cost savings are estimated to be £2.09 million.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £2.04 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £44 to society in return, which shows the programme is value for money.

Table 16: Cost benefit analysis for Heathrow

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£33,000	
SPoC	£0	£14,110	
Total	£0	£47,110	
Impacts			
Local authority	£2,912	£8,406	-£5,494
Consumer	£3,278,752	£1,170,983	£2,107,769
Retailer	£20,619	£7,364	£13,255
Importer	£0	£25,755	-£25,755
Total	£3,302,283	£1,212,507	£2,089,776
Net benefit			£2,042,667
Benefit-cost ratio			£44

The results for the London Gateway are as follows:

- The total cost of surveillance for goods coming through the London Gateway is £62,813. This includes NTSB budget provided to Thurrock and a relative proportion of costs associated with SPoC activities.
- The programme is estimated to prevent 17,723 unsafe goods entering the country. It should be noted, that at the point of analysis, surveillance for the London Gateway had only been active for 3 months, and therefore this estimate has been scaled up on a pro rata basis to provide an annual estimate. We recognise that there are likely to be seasonal effects, but in the absence of any further data, we have unable to reflect these in this adjustment.

- The incremental costs to the local authority for mitigation activities related to unsafe goods are £7,597.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £31,698.
- The total cost savings are estimated to be £0.54 million.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £0.48 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £9 to society in return, which shows the programme is value for money. It should be noted that this port is in its infancy and is set to expand to become one of the largest ports in the EU. It is therefore expected that once expansion gets underway and data on surveillance activities have been collected for at least one year, the B:C ratio could be within the same range of Tilbury, Felixstowe and Southampton if they are able to replicate the same level of success.

Table 17: Cost benefit analysis for the London Gateway

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£44,000	
SPoC	£0	£18,813	
Total	£0	£62,813	
Impacts			
Local authority	£1,839	£9,437	-£7,597
Consumer	£563,899	£0	£563,899
Retailer	£16,314	£0	£16,314
Importer	£0	£31,698	-£31,698
Total	£582,052	£41,135	£540,917
Net benefit			£478,104
Benefit-cost ratio			£9

The results for Tilbury are as follows:

- The total cost of surveillance for goods coming through Tilbury is £15,703. This includes NTSB budget provided to Thurrock and a relative proportion of costs associated with SPoC activities.
- The programme was estimated to prevent 43,200 unsafe goods entering the country. It should be noted, that at the point of analysis, surveillance for Tilbury had only been active for 3 months, and therefore this estimate has been scaled up on a pro rata basis to provide an annual estimate. We recognise that there are likely to be seasonal effects, but in the absence of any further data, we have unable to reflect these in this adjustment.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £18,518.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £77,264.
- The total cost savings are estimated to be £1.32 million.

- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £1.30 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £84 to society in return, which shows the programme is value for money.

Table 18: Cost benefit analysis for Tilbury

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£11,000	
SPoC	£0	£4,703	
Total	£0	£15,703	
Impacts			
Local authority	£4,484	£23,002	-£18,518
Consumer	£1,374,503	£0	£1,374,503
Retailer	£39,765	£0	£39,765
Importer	£0	£77,264	-£77,264
Total	£1,418,752	£100,266	£1,318,486
Net benefit			£1,302,783
Benefit-cost ratio			£84

The results for Coventry postal hub are as follows:

- The total cost of surveillance for goods coming through Coventry postal hub is £15,703.
- The programme was estimated to prevent 15,600 unsafe goods entering the country. It should be noted, that at the point of analysis, surveillance for the Coventry postal hub had only been active for 6 months, and therefore this estimate has been scaled up on a pro rata basis to provide an annual estimate. We recognise that there are likely to be seasonal effects, but in the absence of any further data, we have unable to reflect these in this adjustment.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £32,473.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £334,809.
- The total cost savings are estimated to be £0.30 million.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £0.29 million.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £19 to society in return, which shows the programme is value for money.

Table 19: Cost benefit analysis for Coventry postal hub

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£11,000	
SPoC	£0	£4,703	
Total	£0	£15,703	

	Without surveillance	With surveillance	Benefits (Cost savings)
Impacts			
Local authority	£67,203	£99,676	-£32,473
Consumer	£496,348	£0	£496,348
Retailer	£172,316	£0	£172,316
Importer	£0	£334,809	-£334,809
Total	£735,868	£434,485	£301,383
Net benefit			£285,680
Benefit-cost ratio			£19

The results for Newcastle airport are as follows:

- The total cost of surveillance for goods coming through Newcastle airport is £7,138.
- The programme was estimated to prevent 2,400 unsafe goods entering the country. It should be noted, that at the point of analysis, surveillance for the Newcastle airport had only been active for 6 months, and therefore this estimate has been scaled up on a pro rata basis to provide an annual estimate. We recognise that there are likely to be seasonal effects, but in the absence of any further data, we have unable to reflect these in this adjustment.
- The incremental costs to the local authority for mitigation activities related to unsafe goods are £5,012.
- The costs to the importer for storage and destruction of unsafe goods that are identified by the Trading Standards officers was estimated to be £25,755.
- The total cost savings are estimated to be £66,486.
- The net benefit, calculated as the difference between the total benefits (cost savings) and the cost of the intervention, is £59,348.
- The benefit cost ratio indicates that for every £1 invested in prevention, the intervention generates £9 to society in return, which shows the programme is value for money.

Table 20: Cost benefit analysis for Newcastle airport

	Without surveillance	With surveillance	Benefits (Cost savings)
Costs			
Surveillance	£0	£5,000	
SPoC	£0	£2,138	
Total	£0	£7,138	
Impacts			
Local authority	£4,425	£9,438	-£5,012
Consumer	£139,996	£55,998	£83,997
Retailer	£22,092	£8,837	£13,255
Importer	£0	£25,755	-£25,755
Total	£166,513	£100,027	£66,486
Net benefit			£59,348
Benefit-cost ratio			£9

Economic impact of incorrect goods

Through surveillance activities performed by Trading Standards officers, incorrect goods, defined as goods which may have labelling issues, or are non-compliant with regulations but are not unsafe, will be identified. Whilst not in the scope of this current study, it is acknowledged that these types of goods may result in economic damages, such as injuries to consumers and the costs to retailers of product withdrawal from the market. As a result of identification of these goods, through surveillance activities, the net benefit and benefit cost ratio for each point of entry may, in reality, be greater than estimated.

Breakeven analysis

This section presents the break-even analysis for number of unsafe goods prevented from entering the country. As described in [Section 4](#), a break-even analysis estimates the impact required for the monetary value of the impact of an intervention to outweigh its cost, or 'break even'. Note that this analysis is for illustrative purposes and does not aim to predict the future outcomes of the Safety at Ports projects for the included points of entry. Instead it attempts to show a number of possible scenarios where the pilot would break even based on the selected outcome. It makes no judgements of likelihood or feasibility.

[Table 21](#) presents the break-even point for the following points of entry, based on a weighted cost of an unsafe good:

- Royal Portbury
- Gatwick airport
- Manchester airport
- East Midlands airport
- Immingham docks

Table 21: Breakeven point by point of entry

Point of entry	Intervention cost	Weighted cost of an unsafe good	Number of unsafe goods to be prevented
Royal Portbury	£15,703	£1,135	14
Gatwick airport	£14,276	£1,118	13
Manchester airport	£15,703	£1,115	14
East Midlands airport	£15,703	£1,117	14
Immingham docks	£15,703	£1,135	14

The results indicate that in order to outweigh the total costs of intervention (NTSB budget plus proportional SPoC costs):

- Royal Portbury would need to prevent 14 unsafe goods entering the country.
- Gatwick would need to prevent 13 unsafe goods entering the country.
- Manchester airport would need to prevent 14 unsafe goods entering the country.
- East Midlands airport would need to prevent 14 unsafe goods entering the country.
- Immingham docks would need to prevent 14 unsafe goods entering the country.

It should be noted, that costs are based on the fact that when one unsafe good is identified, the whole consignment of goods will need to be seized and destroyed. So for instance, with the cost of recall relates to a consignment, however it only takes the identification of one unsafe good to incur this cost.

If any of these points of entry prevent more than the break-even point of number of unsafe goods, then they will generate positive net benefits and a positive benefit cost ratio. Moreover once the points of entry have been undergoing and collecting data on surveillance for one year, future research should focus on replicating the cost-benefit analysis for these points of entry.

4.6 Sensitivity analysis

Data regarding the number of unsafe consignments and subsequently number of unsafe goods being imported via a point of entry came from a mixture of interviews with the Trading Standards representatives, NTSB, the SPoC and Matrix Insight (2009). Because of the different sources of data, large variation in terms of size of consignments and lack of consistency in the type of data collected by points of entry, there is a large degree of uncertainty around the results. NTSB are currently developing a centralised method of data collection for key data items such as number of consignments checked and number of consignments found to be unsafe, which will provide more consistent comparable data for points of entry involved in the Safety at Ports project.

To account for this uncertainty and to test the sensitivity of the benefit-cost ratio to variation in the number of unsafe consignments identified and the number of products per consignment, we ran sensitivity analysis around these two parameters. The results (presented in [Appendix 4](#)) show that the conclusion of the analysis – i.e. that all points of entry represent a good investment from an economic point of view – generally remains, even when the number of consignments is increased and the number of products per consignment is reduced. The results of the sensitivity analysis can also be used as an indication of the minimum number of unsafe products that need to be prevented coming through a point of entry, in order for it to be worth investing in surveillance activities.

5.0 Conclusion

The main aim of this study was to evaluate the Safety at Ports project in relation to the risks and associated matters of product safety at points of entry in England to help inform the future delivery and effectiveness of the project. Specifically, the study included interviews with Trading Standards representatives, a cost benefit analysis and a breakeven analysis. In combination, these methods were designed to help understand the risk, challenges and threats facing the Trading Standards offices with respect to product safety issues and provide recommendations for improvement, as well as estimate the value for every pound invested in the Safety at Ports project.

The results from the study suggest that:

- The main issues facing Trading Standards offices revolve mainly around funding and capacity. Many Trading Standards representatives stated that the funding provided by the NTSB for carrying out surveillance activities is vital and without it, they would not be able to conduct the work. Also, many felt that with increased capacity, they would be able to conduct more surveillance. Other issues facing the Trading Standards offices are as follows:
 - Difficulties in planning capacity for seasonal peaks and bottlenecks in high risk consignments that need to be checked.
 - Lack of storage facilities.
 - Difficulty in recruiting individuals with product safety experience.
 - Lack of a co-ordinated approach to using and maintaining data on key central databases.
 - Difficulty in prosecuting problem importers.
 - The rise of internet traders.
 - Importers increasingly importing goods through the postal service and private couriers.
 - Developing good working relationships with UK Border Force.
- From the interviews with Trading Standards representatives, the following recommendations were made to help improve activities around product safety:
 - Continued funding from the NTSB
 - Develop a national approach to dealing with product safety
 - Streamline intelligence databases
 - Increased co-ordination with UK Border Force
- The value of the impact to society of unsafe goods potentially entering the consumer market in the absence of surveillance activities by the Trading Standards offices has been estimated to be £281 million pounds, with biggest impact on consumers (£273 million) from injuries, fatalities and fires from unsafe goods.
- The total cost of surveillance activities for the Safety at Ports project is £667,365, which includes the NTSB funding for projects and the cost of the SPoC for risk profiling consignments.
- The points of entry included in the cost-benefit analysis were:
 - Felixstowe
 - Southampton

- Heathrow
- The London Gateway
- Tilbury
- Coventry postal hub
- Newcastle airport
- As a result of surveillance, 1.11 million unsafe goods were estimated to be prevented from entering the consumer market
- The net benefit for these surveillance activities ranges from £59,348 to £13.3 million.
- Our results suggest that for every pound invested in the points of entry, the net economic benefits generated by the points of entry range from £9 to £84. Felixstowe and Southampton are the most established ports within the Safety at Ports project and the net economic benefits generated from reduced impacts to consumers, public services, and businesses are £50 and £65 respectively for every pound invested in surveillance activities. Overall continued investment in the Safety at Ports projects is worthwhile and provides good value for money. It should be noted that ports with the B:C ratio at the lower end of the scale are in their infancy and it is expected that once the projects have been actively performing surveillance and collecting data for at least one year, the B:C ratios should be nearer the higher end of the range. In addition, for all points of entry the results may be understated, as it does not include the potential benefits generated by the identification of incorrect goods.
- The previous analysis for the LBRO found that for every pound invested in increasing surveillance at Felixstowe, it could generate £40 of economic benefits. This ratio included the impact of both unsafe and incorrect goods. While the focus for the current analysis is narrower in terms of goods considered, but broader in terms of other points of entry analysed, the results still show investment in surveillance at points of entry is worthwhile.
- The break-even analysis on the points of entry not included in the cost benefit analysis found:
 - Royal Portbury would need to prevent 14 unsafe goods entering the country.
 - Gatwick would need to prevent 13 unsafe goods entering the country.
 - Manchester airport would need to prevent 14 unsafe goods entering the country.
 - East Midlands airport would need to prevent 14 unsafe goods entering the country.
 - Immingham docks would need to prevent 14 unsafe goods entering the country.

Data regarding the number of unsafe consignments and subsequently number of unsafe goods being imported via a point of entry came from a mixture of sources, and was often found to be inconsistent amongst Trading Standards offices and subject to large amounts of variation. To account for this uncertainty and to test the sensitivity of the benefit-cost ratio to variation in the number of unsafe consignments identified and the number of products per consignment, we ran sensitivity analysis around these two parameters. The results show that the conclusion of the analysis – i.e. that all points of entry represent a good investment from an economic point of view – generally remains, even when the number of consignments is increased and the number of products per consignment is reduced

The results of the cost benefit analysis hinge on the accuracy of the volume of goods coming through the points of entry, and the amount of consignments/ goods detected as unsafe. Future research efforts focusing on the value for money of product safety surveillance need to focus on developing consistent and accurate data collection methods with common definitions, which can help to develop a clearer picture of the size of the product safety problem, and impact that the surveillance activities are having in preventing unsafe goods from entering the country. In addition, for the new projects which are yet to start active surveillance or yet to identify unsafe goods, future research should involve replicating the cost benefit analysis to include these points of entry.

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7.0 Appendix

Appendix 1: Interview template for Trading Standards representatives

Thank you for agreeing to this interview.

Matrix, an advisory company based in London, has been tasked by the National Trading Standards Board to carry out an **Evaluation of the Safety at Ports Project with particular focus on risks and associated matters as they relate to product safety at UK points of entry, in order to help inform the future delivery and effectiveness of service**. As part of this project, Matrix is collecting evidence about the Safety of Ports Project to conduct an economic evaluation.

Interviews with port representatives of the policy are integral to this study to help us identify this data.

Opinions collected will remain anonymous and they would feed directly into preparatory work for the Evaluation of the Safety at Ports Project. The information you provide is protected by the data confidentiality act of 2003.

This questionnaire contains 22 open questions. Questions are grouped under main headings:

- The goods arriving at the port (process, costs)
- General use of resources for surveillance and mitigation activities
- Selecting goods for surveillance activities (process, costs)
- Examining potentially unsafe or incorrect goods (process, costs)
- Follow up activity after the unsafe or incorrect good is identified (process, costs)
- Imported unsafe or incorrect goods have been identified inland (process, costs)
- The evolution of threats regarding product safety of imported goods

The goods arriving at port

1. How long have you been involved with the safety at ports project, till what time will you be involved?
2. Do you have a port of entry?

3. In your opinion, what is the percentage of UK container traffic coming through at ...(relevant port of entry).. in 2013?

Prompt: in Matrix 2009: 38%, in 2012 42%, what is the evolution to be expected?

4. What is the amount of goods coming through other point of entry in UK?
5. Can you please provide an estimate of the number of goods arriving at ...(relevant port of entry)...in 2013?
 - a. IF CONSIGNMENT: Can you please provide an estimate of the number of goods in a single consignment/container/shipment/delivery?
 - b. Of these consignments/ goods that arrive at the port how many come from outside the EU?
 - c. In your opinion, how many of those consignments/goods are at risk of non-compliance (containing incorrect or unsafe goods)?
6. In your opinion, how many seized counterfeit products are also unsafe?
7. Which are the most common types of unsafe products arriving from outside the EU?
 - a) *Where do they come from?*
8. Which are the most common types of incorrect products (mislabelled etc. Not necessary unsafe) arriving from outside the EU?

General use of resources for surveillance and mitigation activities

9. What are the total mitigation costs to prevent unsafe goods to harm consumers? (without those costs no goods would be checked for safety?)
 - a. In your opinion what are the “operational costs”?

Selecting goods for surveillance activities

10. When goods from outside the EU arrive through the relevant port, we would like to know the steps of the process how an unsafe/ incorrect good is identified?
 - a. What is the first step in the process to identify an unsafe good?
 - b. What is the next step?

Prompt: Is there a process similar to a paperwork check of potentially risky consignments?

- i. Can you please provide an estimate of the number of consignments selected after this step?
 - ii. Can you please provide an estimate of the number of consignments not selected for this step?
- c. Is there another step after that?
- i. Please estimate the number of goods that is sampled and how many are not sampled?
 - ii. In your opinion, what is the probability that a consignment is incorrect in the sample?
 - iii. In your opinion, what is the probability that a consignment is unsafe in the sample?
 - iv. In your opinion, what is the probability that an incorrect consignment is also unsafe in the sample?

Prompt: range 20-25%

11. Can you please provide an estimate of the cost of this identification process?
- d. Please give a breakdown per step in the process described above:
 - e. IF NOT COST: Please provide the amount of time, resources or salary/hourly wage rate

Examining potentially unsafe or incorrect goods

12. Can you please explain how the goods selected via the sifting procedure described above are examined to determine whether or not a product is unsafe/incorrect?
13. Can you please estimate the number of goods that are identified as incorrect or unsafe after this examination?
14. Can you please provide an estimate of the cost of this mitigation process?
- a. IF NOT COST: Please provide the amount of time, resources or salary/hourly wage rate

Follow up activity after the unsafe or incorrect good is identified

15. Can you please explain what happens after the unsafe or incorrect goods are identified?

16. Can you please provide an estimate of the cost of this mitigation process?
 - b. IF NOT COST: Please provide the amount of time, resources or salary/hourly wage rate

Imported unsafe or incorrect goods have been identified inland

17. Does the inland authority also check goods for safety coming from ports?
18. What is the relationship between the port of entry and the inland authority?
 - a. Is there sufficient communication?

19. Can you please explain the process how the mitigation policy copes with unsafe goods that have been identified inland?

20. What is the cost of mitigation activities relating to unsafe goods identified inland?

21. Do you know the costs associated with product recall?

The evolution of threats regarding product safety of imported goods

22. In your opinion, could you outline one or two of the most prominent challenges concerning product safety in the relevant port?

Appendix 2: Trading Standards offices process maps

Figure 3: Felixstowe process map



Figure 4: Southampton process map

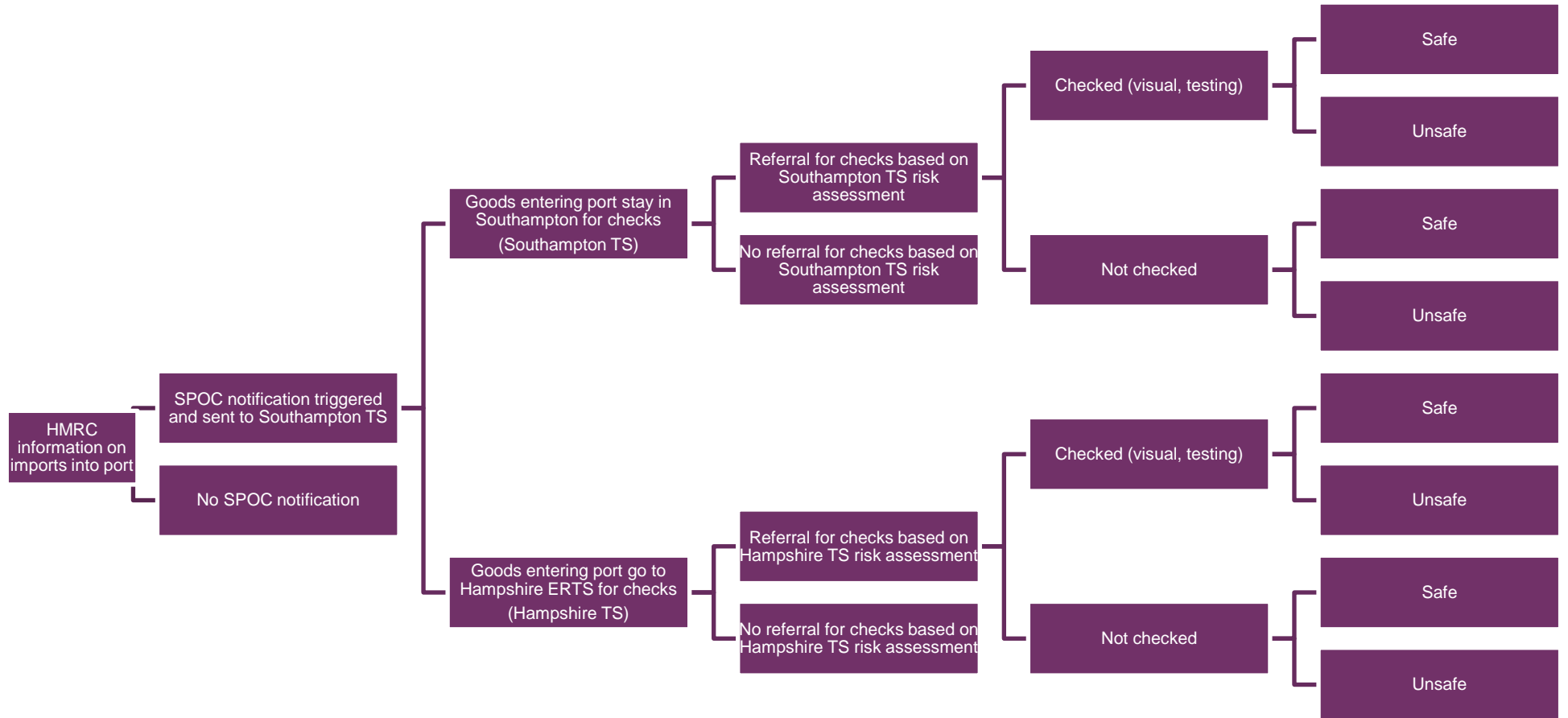


Figure 5: Heathrow process map

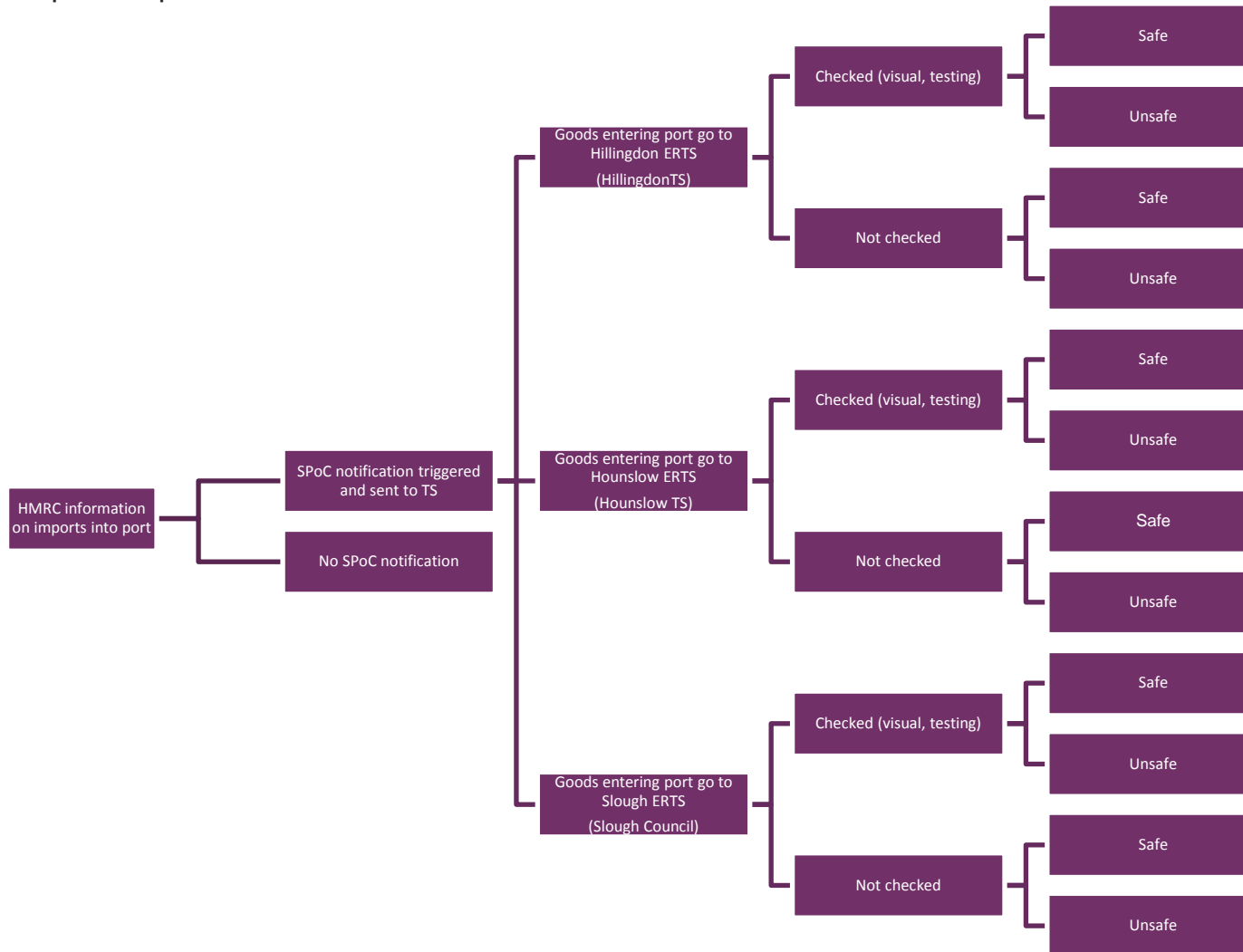


Figure 6: London gateway process map

London Gateway has two processes that work in tandem to identify unsafe goods. They are based on notifications sent from the SPoC and their own manual checks of manifests documents for goods arriving at the port.

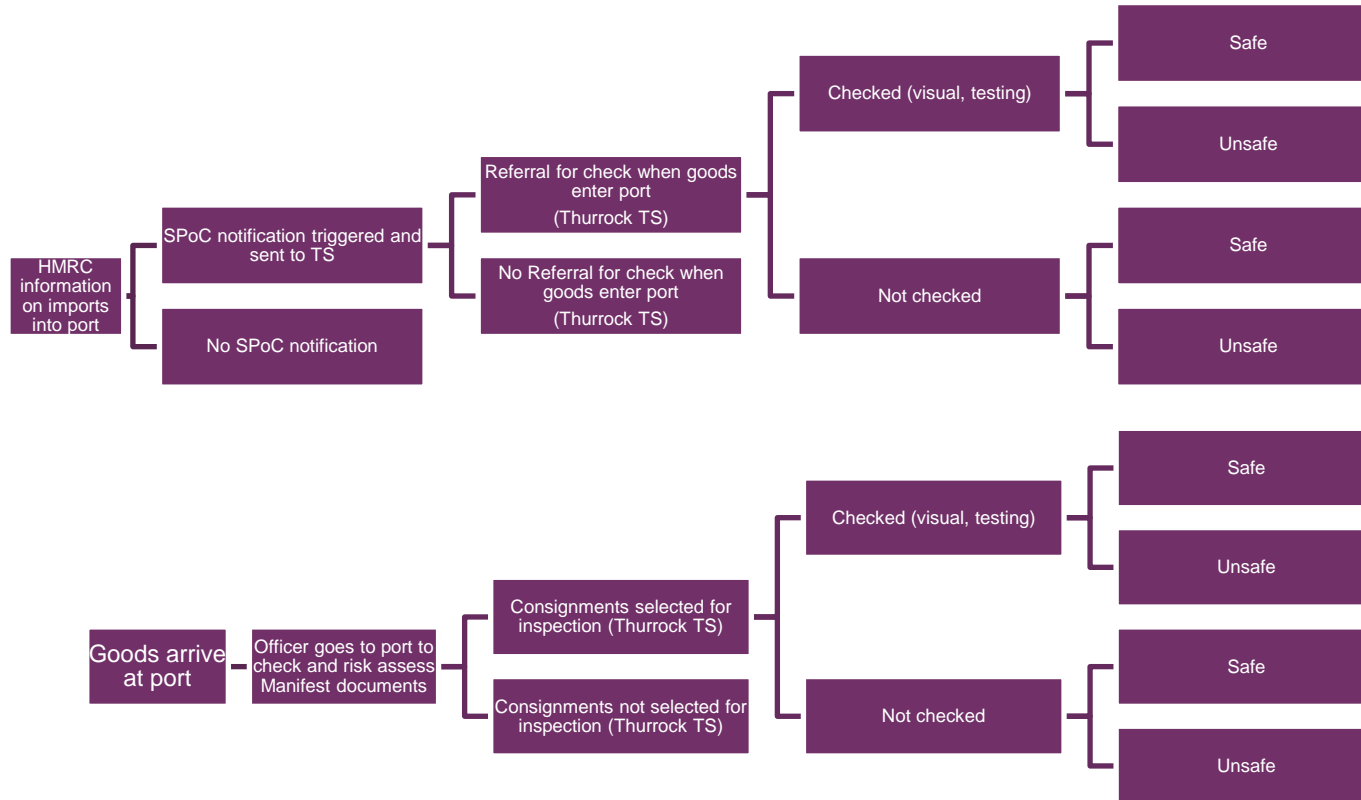


Figure 7: Tilbury process map

Tilbury has two processes that work in tandem to identify unsafe goods. They are based on notifications sent from the SPoC and their own manual checks of manifests documents for goods arriving at the port.

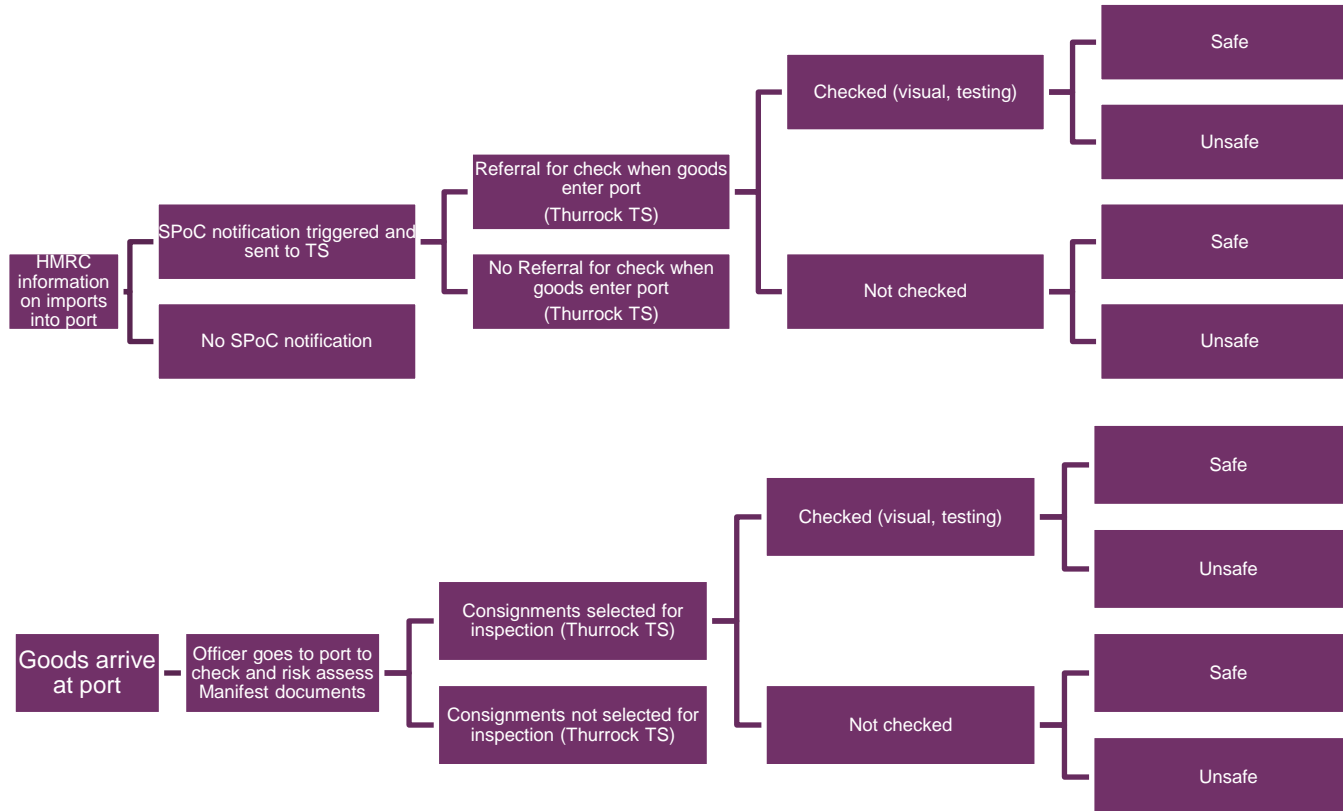


Figure 8: Coventry postal hub process map

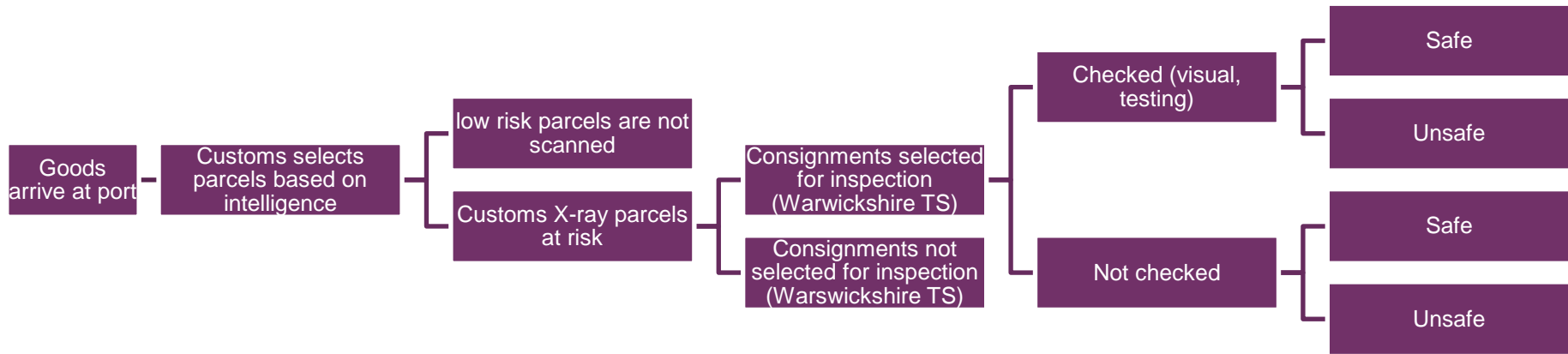


Figure 9: Newcastle airport process map

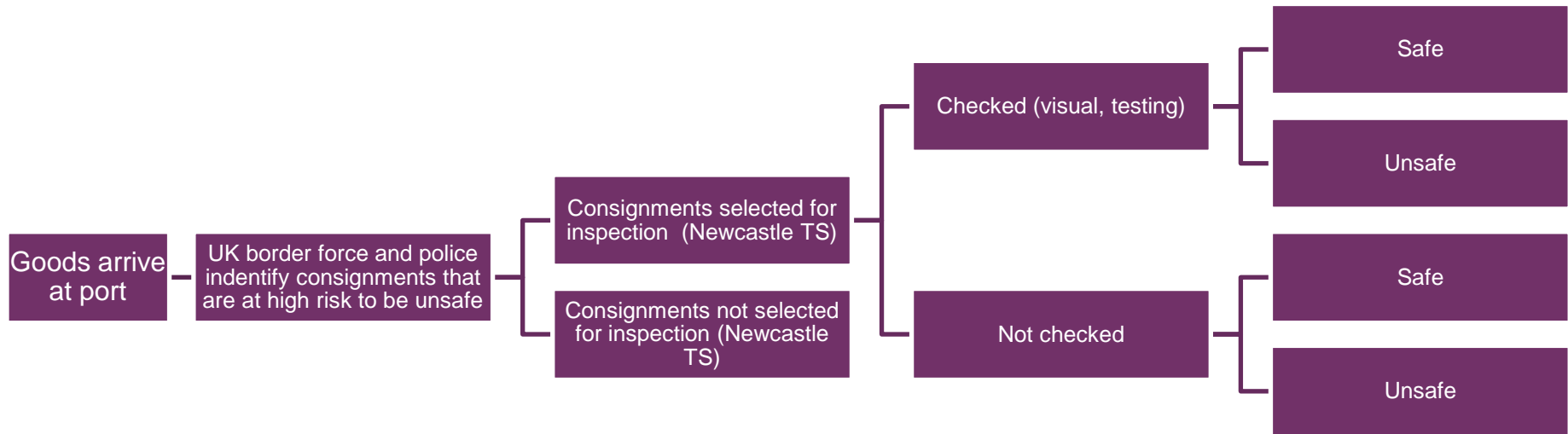


Figure 10: Royal Portbury process map

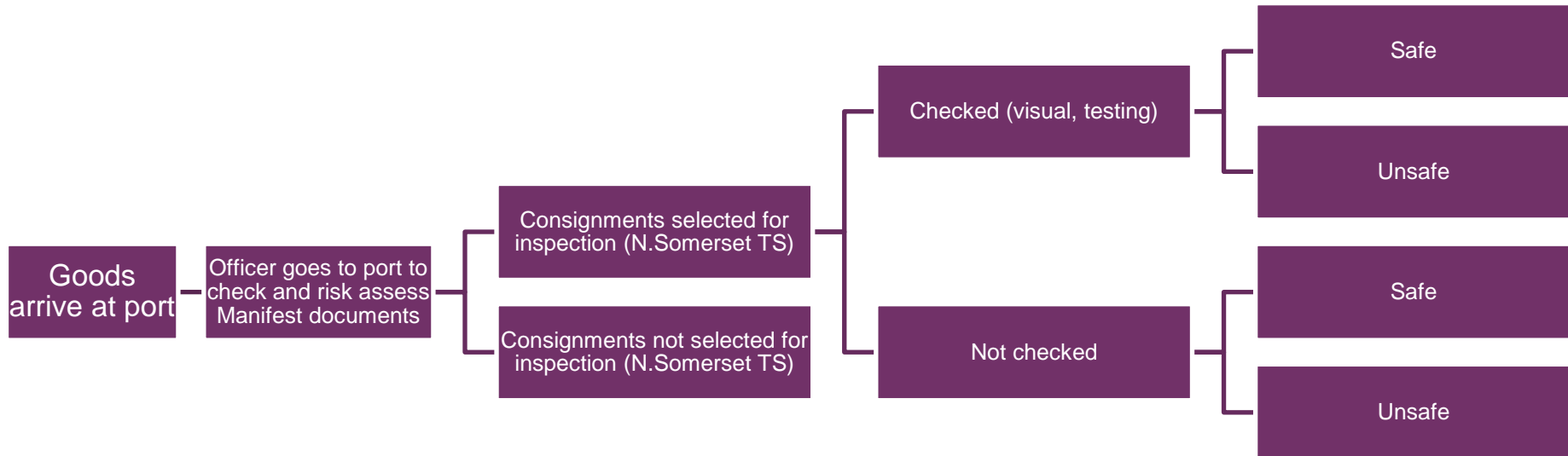


Figure 11: Gatwick airport process map

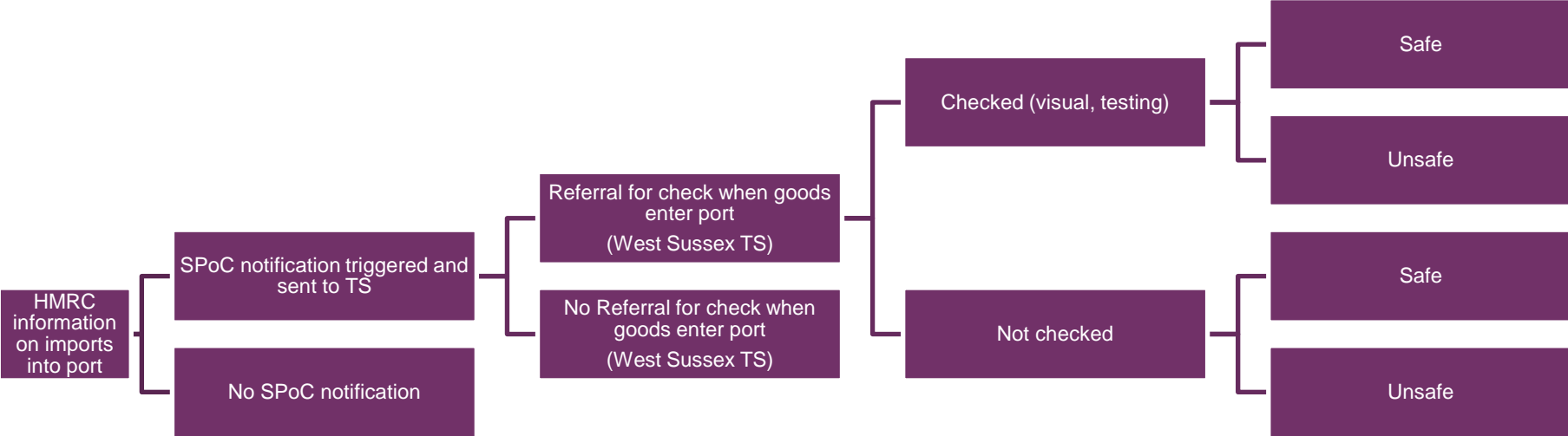


Figure 12: Manchester airport process map

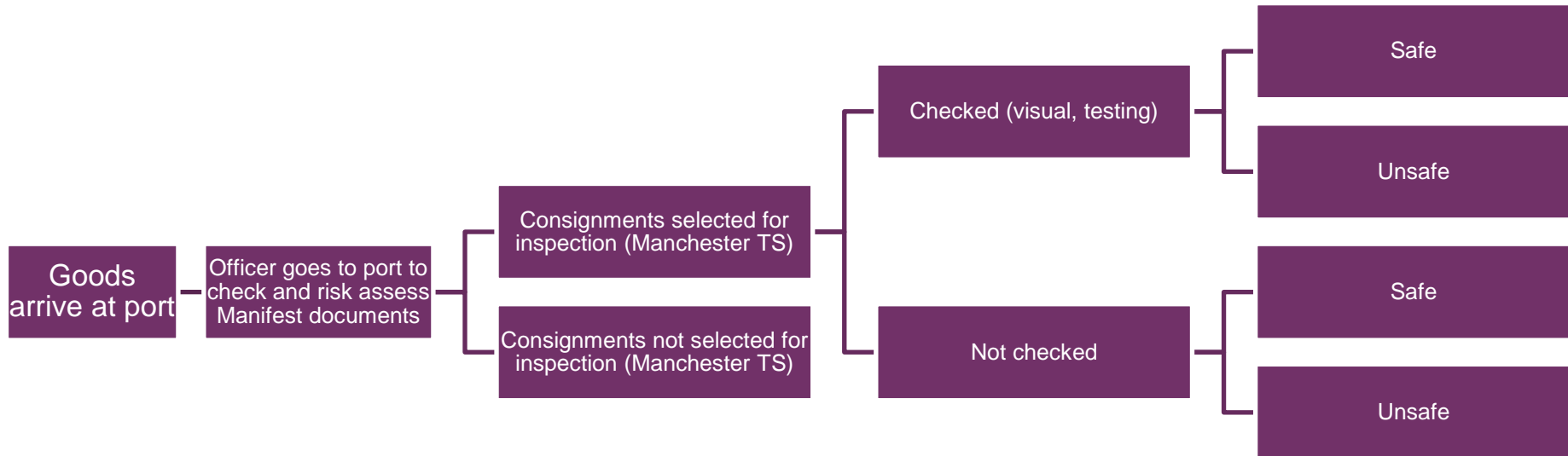


Figure 13: East Midlands airport process map

East Midlands airport has two processes that work in tandem to identify unsafe goods. They are based on notifications sent from UK Border Force and their own risk assessment of consignments for goods arriving at the port.

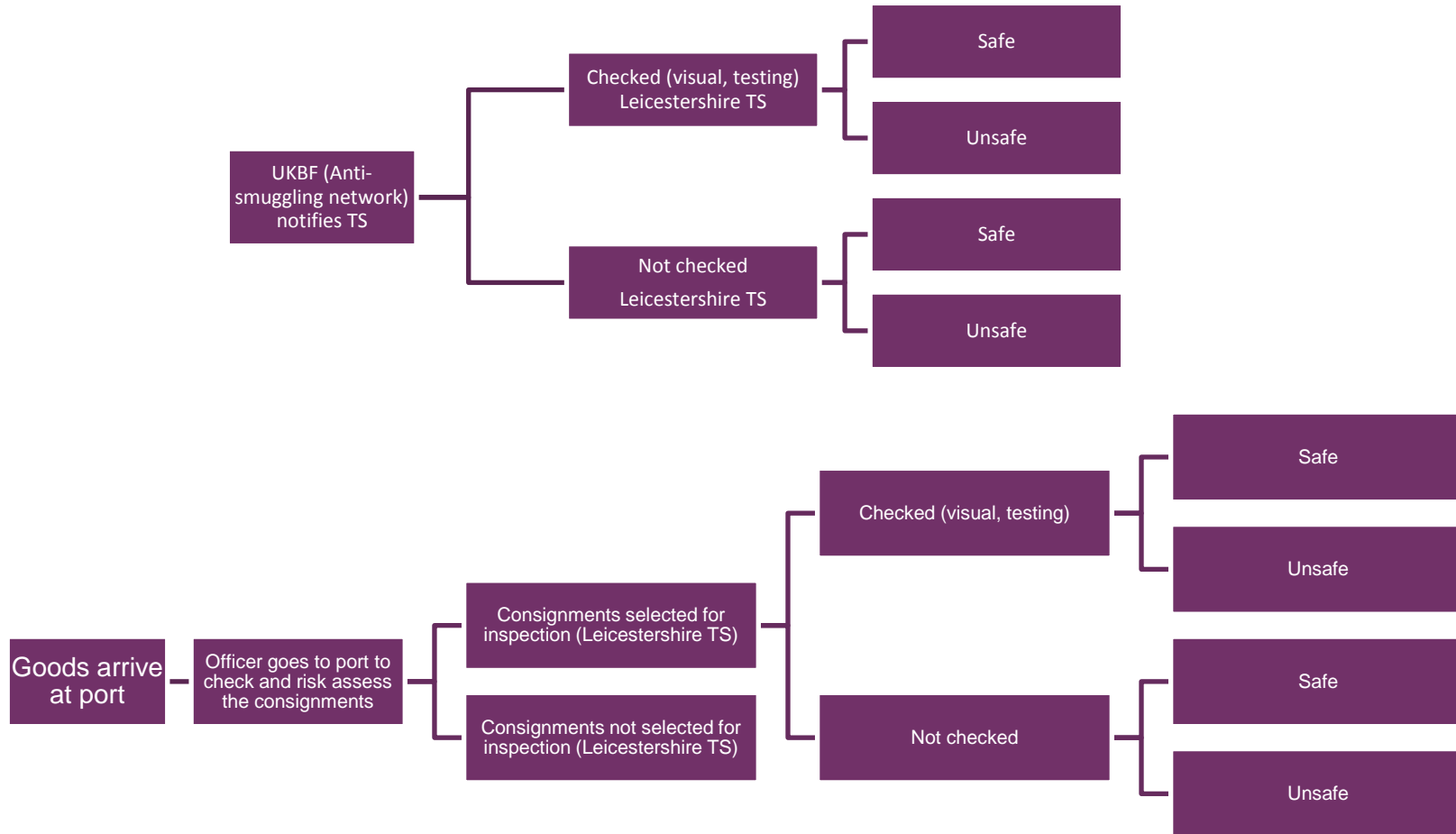
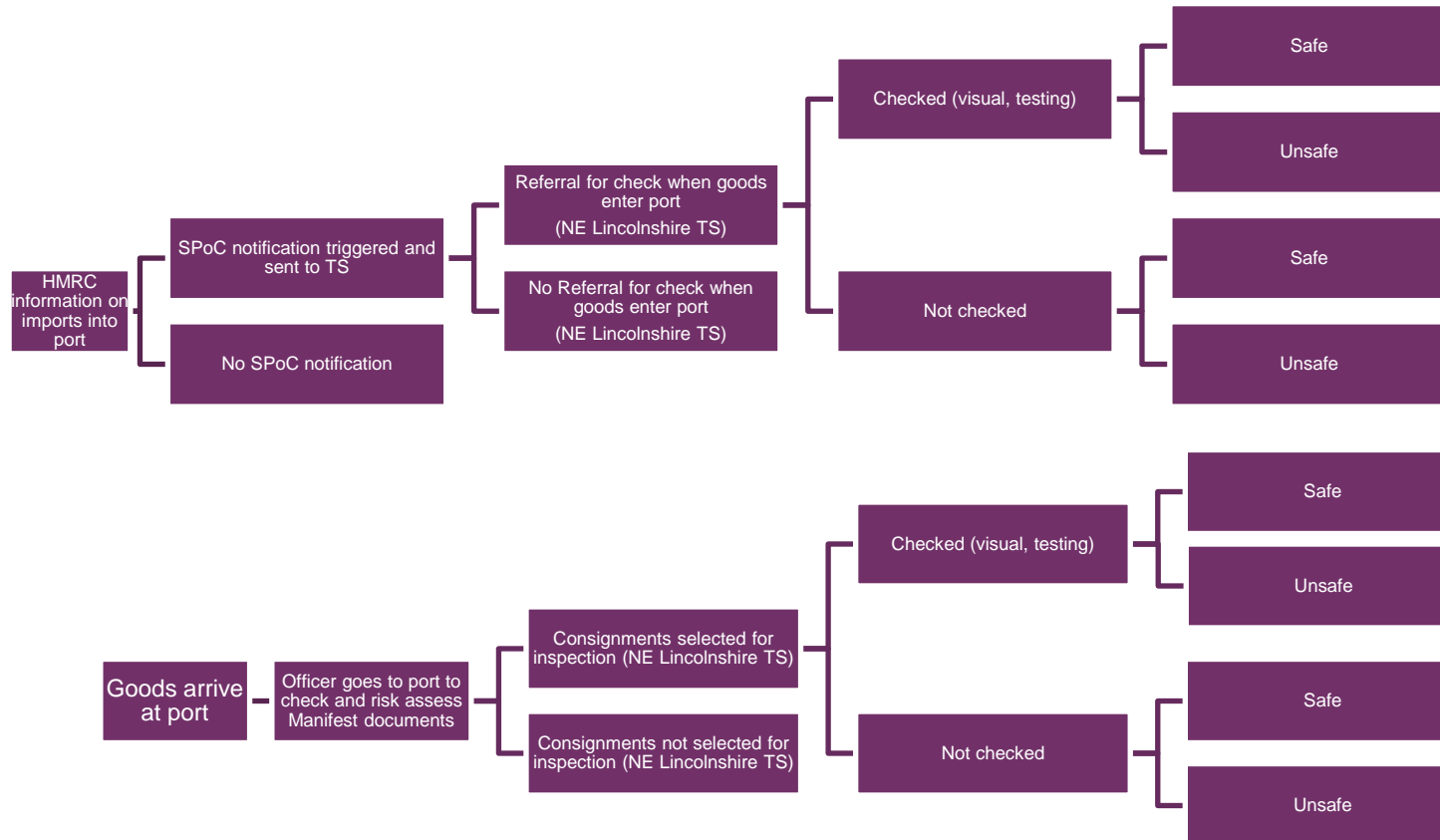


Figure 14: Immingham docks process map

Immingham docks has two processes that work in tandem to identify unsafe goods. They are based on notifications sent from the SPoC and their own manual checks of manifests documents for goods arriving at the port.



Appendix 3: Data for economic model

Table 22 present detailed descriptions of parameters used to populate the economic model and estimate the costs associated with unsafe goods.

Table 22: Detailed description of addition model parameters

Reference	Description	Value	Assumption	Calculations and sources
A	Number of unsafe goods ('do nothing')	8,864,607		Based on evidence from interviews with Trading Standards
B	Est. Number of injuries caused by incorrect and unsafe products (incl. cosmetics) per annum in the UK	276,052		RoSPA (2002)
C	Est. Proportion of injuries which are 'other reportable injury' - ie: more serious	2.17%		RoSPA (2002)
D	Probability of major injury	0.07%	Calculation	Probability of major injury = (B*C)/A = (276,052*2.17%) / 8,864,607
E	Number of deaths from faulty appliances and leads	19		Department for Communities and Local Government (2012)
F	Probability of fatality	0.0002%	Calculation	Probability of fatality =E/A =19 / 8,864,607
G	No. of accidental dwelling fires due to faulty appliances and leads	5,700		Department for Communities and Local Government (2012)
H	Probability of fire	0.06%	Calculation	Probability of fire =G / A = 5,700 / 8,864,607
I	Number of unsafe consignments ('do nothing')	5,059		Based on evidence from interviews with Trading Standards

Reference	Description	Value	Assumption	Calculations and sources
J	Number of consumer goods and toys recalled in UK	112		Recall UK (2013)
K	Probability of recall	2.21%	Calculation	Probability of recall =J / I =112 / 5,059
L	Cost of goods reaching a consumer	£639	Inflated to 2013 prices using GDP deflator from HM Treasury (2013)	Matrix Insight (2009)
M	Cost of major injury	£8,122	Inflated to 2013 prices using GDP deflator from HM Treasury (2013)	HSE (2012)
N	Cost of fatality	£1,641,154	Inflated to 2013 prices using GDP deflator from HM Treasury (2013)	HSE (2012)
O	Cost of fire	£30,353	Inflated to 2013 prices using GDP deflator from HM Treasury (2013)	HSE (2012)
P	Cost of recall	£49,898	Inflated to 2013 prices using GDP deflator from HM Treasury (2013)	Matrix Insight (2009)
Q	Probability of goods reaching a consumer (Royal Portbury)	0.3%	Population living in area used as a proxy for probability of goods reaching consumer	Office of National Statistics 2011 Census – Population density by Local Authority
R	Probability of	1.3%	Population	Office of National Statistics

Reference	Description	Value	Assumption	Calculations and sources
	goods reaching a consumer (Gatwick airport)		living in area used as a proxy for probability of goods reaching consumer	2011 Census – Population density by Local Authority
S	Probability of goods reaching a consumer (Manchester airport)	0.8%	Population living in area used as a proxy for probability of goods reaching consumer	Office of National Statistics 2011 Census – Population density by Local Authority
T	Probability of goods reaching a consumer (East Midlands airport)	1%	Population living in area used as a proxy for probability of goods reaching consumer	Office of National Statistics 2011 Census – Population density by Local Authority
U	Probability of goods reaching a consumer (Immingham docks)	0.3%	Population living in area used as a proxy for probability of goods reaching consumer	Office of National Statistics 2011 Census – Population density by Local Authority
V	Weighted cost of unsafe good (Royal Portbury)	£1,135	Calculation	Weighted cost of unsafe good (Royal Portbury) $= (Q * L) + (D * M) + (F * N) + (H * O) + (K * P)$ $= (0.3\% * 639) + (0.07\% * 8,122) + (0.0002\% * 1,641,154) + (0.06\% * 30,353) + (2.21\% * 49,898)$
W	Weighted cost of unsafe good (Gatwick airport)	£1,118	Calculation Fatality and Fire have been excluded from the	Weighted cost of unsafe good (Gatwick airport) $= (R * L) + (D * M) + (K * P)$ $= (1.3\% * 639) + (0.07\% * 8,122) + (2.21\% * 49,898)$

Reference	Description	Value	Assumption	Calculations and sources
			cost, as most goods coming through the airport are cosmetics	
X	Weighted cost of unsafe good (Manchester airport)	£1,115	Calculation Fatality and Fire have been excluded from the cost, as most goods coming through the airport are cosmetics	Weighted cost of unsafe good (Manchester airport) $= (S * L) + (D * M) + (K * P)$ $= (0.8\% * 639) + (0.07\% * 8,122) + (2.21\% * 49,898)$
Y	Weighted cost of unsafe good (East Midlands airport)	£1,117	Calculation Fatality and Fire have been excluded from the cost, as most goods coming through the airport are cosmetics	Weighted cost of unsafe good (East Midlands airport) $= (T * L) + (D * M) + (K * P)$ $= (1\% * 639) + (0.07\% * 8,122) + (2.21\% * 49,898)$
Z	Weighted cost of unsafe good (Immingham docks)	£1,135	Calculation	Weighted cost of unsafe good (Immingham docks) $= (U * L) + (D * M) + (F * N) + (H * O) + (K * P)$ $= (0.3\% * 639) + (0.07\% * 8,122) + (0.0002\% * 1,641,154) + (0.06\% * 30,353) + (2.21\% * 49,898)$

Appendix 4: Sensitivity analysis

This section presents sensitivity analysis for the return on investment (benefit-cost ratio) yield by points of entry in the Safety at Ports project.

Table 23: Sensitivity analysis for Felixstowe

Number of unsafe consignments identified	Number of unsafe products per consignment									
	200	400	600	800	1000	1200	1400	1600	1800	2000
37	15.5	26.1	34.7	41.9	48.0	53.3	58.0	62.1	65.9	69.3
73	15.2	25.8	34.4	41.6	47.7	53.0	57.6	61.7	65.5	68.8
110	14.9	25.4	34.1	41.2	47.3	52.6	57.2	61.3	65.0	68.4
146	14.6	25.1	33.7	40.9	47.0	52.2	56.8	60.9	64.6	68.0
183	14.3	24.8	33.4	40.5	46.6	51.8	56.4	60.5	64.2	67.5
219	14.0	24.5	33.1	40.2	46.2	51.5	56.0	60.1	63.8	67.1
256	13.7	24.2	32.7	39.8	45.9	51.1	55.7	59.7	63.4	66.7
292	13.4	23.9	32.4	39.5	45.5	50.7	55.3	59.3	62.9	66.2
329	13.1	23.6	32.1	39.1	45.1	50.3	54.9	58.9	62.5	65.8
365	12.7	23.2	31.7	38.8	44.8	50.0	54.5	58.5	62.1	65.4
402	12.4	22.9	31.4	38.5	44.4	49.6	54.1	58.1	61.7	64.9
438	12.1	22.6	31.1	38.1	44.1	49.2	53.7	57.7	61.3	64.5
475	11.8	22.3	30.7	37.8	43.7	48.8	53.3	57.3	60.8	64.1
511	11.5	22.0	30.4	37.4	43.3	48.5	52.9	56.9	60.4	63.6
548	11.2	21.7	30.1	37.1	43.0	48.1	52.5	56.5	60.0	63.2

Table 24: Sensitivity analysis for Southampton

Number of unsafe consignments identified	Number of unsafe products per consignment						
	500	1000	1500	2000	2500	3000	3500
12	2.0	2.8	3.4	3.9	4.3	4.7	5.0
23	3.0	4.6	5.9	7.0	8.0	8.8	9.5
35	4.0	6.5	8.5	10.2	11.6	12.8	13.9
47	5.0	8.3	11.0	13.3	15.2	16.9	18.4
59	6.0	10.2	13.6	16.4	18.9	21.0	22.9
70	7.0	12.0	16.1	19.6	22.5	25.1	27.3
82	8.0	13.9	18.7	22.7	26.1	29.1	31.8
94	9.1	15.8	21.2	25.8	29.8	33.2	36.2
105	10.1	17.6	23.8	29.0	33.4	37.3	40.7
117	11.1	19.5	26.3	32.1	37.0	41.3	45.1
129	12.1	21.3	28.9	35.2	40.7	45.4	49.6
141	13.1	23.2	31.4	38.4	44.3	49.5	54.0
152	14.1	25.0	34.0	41.5	48.0	53.5	58.5
164	15.1	26.9	36.6	44.7	51.6	57.6	62.9
176	16.1	28.7	39.1	47.8	55.2	61.7	67.4

Table 25: Sensitivity analysis for Heathrow

Number of unsafe consignments identified	Number of unsafe products per consignment									
	2000	4000	6000	8000	10000	12000	14000	16000	18000	20000
1	18.1	21.1	24.1	27.1	30.0	33.0	35.9	38.9	41.8	44.8
2	18.1	21.0	24.0	27.0	30.0	32.9	35.9	38.8	41.8	44.7

Number of unsafe consignments identified	Number of unsafe products per consignment									
	2000	4000	6000	8000	10000	12000	14000	16000	18000	20000
3	18.0	21.0	24.0	26.9	29.9	32.9	35.8	38.8	41.7	44.7
4	17.9	20.9	23.9	26.9	29.9	32.8	35.8	38.7	41.7	44.6
5	17.9	20.9	23.8	26.8	29.8	32.8	35.7	38.7	41.6	44.5
6	17.8	20.8	23.8	26.8	29.7	32.7	35.7	38.6	41.5	44.5
7	17.8	20.7	23.7	26.7	29.7	32.6	35.6	38.5	41.5	44.4
8	17.7	20.7	23.7	26.6	29.6	32.6	35.5	38.5	41.4	44.4
9	17.6	20.6	23.6	26.6	29.6	32.5	35.5	38.4	41.4	44.3
10	17.6	20.6	23.6	26.5	29.5	32.5	35.4	38.4	41.3	44.2

Table 26: Sensitivity analysis for the London Gateway

Number of unsafe consignments identified	Number of unsafe products per consignment									
	200	400	600	800	1000	1200	1400	1600	1800	2000
1	1.7	3.2	4.7	6.2	7.7	9.2	10.7	12.2	13.7	15.2
2	1.7	3.2	4.7	6.2	7.7	9.2	10.7	12.2	13.7	15.1
3	1.7	3.2	4.6	6.1	7.6	9.1	10.6	12.1	13.6	15.1
4	1.6	3.1	4.6	6.1	7.6	9.1	10.6	12.1	13.6	15.1
5	1.6	3.1	4.6	6.1	7.6	9.0	10.5	12.0	13.5	15.0
6	1.5	3.0	4.5	6.0	7.5	9.0	10.5	12.0	13.5	15.0
7	1.5	3.0	4.5	6.0	7.5	9.0	10.4	11.9	13.4	14.9
8	1.4	2.9	4.4	5.9	7.4	8.9	10.4	11.9	13.4	14.9
9	1.4	2.9	4.4	5.9	7.4	8.9	10.4	11.9	13.3	14.8
10	1.3	2.8	4.3	5.8	7.3	8.8	10.3	11.8	13.3	14.8

Table 27: Sensitivity analysis for Tilbury

Number of unsafe consignments identified	Number of unsafe products per consignment									
	200	400	600	800	1000	1200	1400	1600	1800	2000
2	17.1	31.8	46.4	60.9	75.5	90.0	104.5	119.0	133.5	148.0
3	17.0	31.6	46.2	60.8	75.3	89.9	104.4	118.9	133.3	147.8
4	16.8	31.4	46.0	60.6	75.2	89.7	104.2	118.7	133.2	147.6
5	16.7	31.3	45.9	60.5	75.0	89.5	104.1	118.6	133.0	147.5
5	16.5	31.1	45.7	60.3	74.9	89.4	103.9	118.4	132.9	147.3
6	16.3	31.0	45.6	60.1	74.7	89.2	103.7	118.2	132.7	147.2
7	16.2	30.8	45.4	60.0	74.5	89.1	103.6	118.1	132.5	147.0
8	16.0	30.6	45.2	59.8	74.4	88.9	103.4	117.9	132.4	146.8
9	15.9	30.5	45.1	59.7	74.2	88.8	103.3	117.8	132.2	146.7
10	15.7	30.3	44.9	59.5	74.1	88.6	103.1	117.6	132.1	146.5
11	15.5	30.2	44.8	59.3	73.9	88.4	102.9	117.4	131.9	146.4
12	15.4	30.0	44.6	59.2	73.7	88.3	102.8	117.3	131.8	146.2
13	15.2	29.8	44.4	59.0	73.6	88.1	102.6	117.1	131.6	146.0
14	15.1	29.7	44.3	58.9	73.4	88.0	102.5	117.0	131.4	145.9

Table 28: Sensitivity analysis for Coventry postal hub

Number of	Number of unsafe products per consignment									
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unsafe consignments identified	25	50	100	125	150	200
31	17.6	25.5	41.3	49.2	57.1	72.8
47	14.9	22.8	38.6	46.4	54.3	70.1
62	12.1	20.0	35.8	43.7	51.6	67.3
78	9.3	17.2	33.0	40.9	48.8	64.5
94	6.6	14.5	30.3	38.1	46.0	61.8
109	3.8	11.7	27.5	35.4	43.3	59.0
125	1.0	8.9	24.7	32.6	40.5	56.2
140	-1.7	6.2	22.0	29.8	37.7	53.5
156	-4.5	3.4	19.2	27.1	35.0	50.7
172	-7.3	0.6	16.4	24.3	32.2	47.9
187	-10.0	-2.1	13.7	21.5	29.4	45.2
203	-12.8	-4.9	10.9	18.8	26.7	42.4
218	-15.6	-7.7	8.1	16.0	23.9	39.6
234	-18.3	-10.4	5.4	13.2	21.1	36.9

Table 29: Sensitivity analysis for Newcastle airport

Number of unsafe consignments identified	Number of unsafe products per consignment							
	25	50	100	125	150	200	250	300
1	3.2	4.5	7.2	8.5	9.9	12.5	15.2	17.9
2	2.8	4.1	6.8	8.1	9.5	12.1	14.8	17.5
3	2.4	3.7	6.4	7.7	9.1	11.8	14.4	17.1
4	2.0	3.3	6.0	7.4	8.7	11.4	14.0	16.7
5	1.6	3.0	5.6	7.0	8.3	11.0	13.6	16.3
6	1.2	2.6	5.2	6.6	7.9	10.6	13.3	15.9
7	0.8	2.2	4.8	6.2	7.5	10.2	12.9	15.5
8	0.4	1.8	4.5	5.8	7.1	9.8	12.5	15.2
9	0.1	1.4	4.1	5.4	6.7	9.4	12.1	14.8
10	-0.3	1.0	3.7	5.0	6.4	9.0	11.7	14.4

Appendix 5: Regulatory bodies

This section outlines the main roles and responsibilities of regulatory bodies at national and local levels. The regulatory bodies outlined below are not an exhaustive list of bodies involved with the regulatory landscape, but are those most relevant to the threats covered in this report.

Central government and national regulators

Department for Business, Innovation and Skills (BIS): BIS promotes the creation and growth of business and leads work to create the conditions for business success through competitive, flexible and fair markets. It has an interest in consumer protection legislation and as well as being the voice for business across government, it is responsible for regulatory reform policy and works across government and the regions to raise levels of UK productivity. It has recently merged with the Department for Innovation, Universities and Skills.

HM Revenue and Customs (HMRC): HMRC is a non-ministerial department formed in 2005, following the merger of Inland Revenue and HM Customs and Excise Departments. HMRC ensures the correct tax is paid at the right time, whether this relates to payment of taxes received by the department or entitlement to benefits paid.

UK Border Force (UKBF): Border Force is a law enforcement command within the Home Office. We secure the UK border by carrying out immigration and customs controls for people and goods entering the UK. Border Force was formed on 1 March 2012 as a law enforcement command within the Home Office. Border Force secures the border and promotes national prosperity by facilitating the legitimate movement of individuals and goods, whilst preventing those that would cause harm from entering the UK. This is achieved through the immigration and customs checks carried out by our staff at ports and airports.

Local Government

Local Authorities: Local Authority Regulatory Services (LARS) are a function of local government, in this context specifically the functions of environmental health and Trading Standards. In two-tier areas, environmental health is delivered by district councils and Trading Standards by county councils. LARS budgets are set by their local authority which is funded through local council tax revenues and a central grant from HM Treasury depending on devolved arrangements. They may also receive further central government funding for specific activities. LARS are accountable to their authority and therefore their priorities are in part dependent upon decisions made by local politicians. Below is an outline of the work of the four relevant functional areas of LARS for the threats covered by this project.

Animal Health (AH): Generally AH is undertaken by Trading Standards offices, dependent on the structure of the local authority. Animal health officers often work closely with the Animal

Health Agency and ensure that all farmed animals in the UK are disease free, healthy and well looked after.

Environmental Health (EH): EH is responsible for carrying out functions in relation to environmental protection, food safety and nutrition, health and safety, public health and housing.

Port Health (PH): Local authorities may have PH responsibilities if they encompass a point of entry, such as an air or sea port. Where the point of entry is a seaport then a Port Health Authority may be formed to carry out the responsibilities of the LA. Port Health Authorities can only be formed in England and Wales and are formed from a single or multiple riparian authorities. The core responsibilities of the PHA are in preventing the introduction into the UK of epidemic, contagious and infectious diseases and other responsibilities have been assigned through law including ensuring the wholesomeness of imported foods. These functions would otherwise be the responsibility of EH and are so in local authorities with PH functions, i.e. those with an airport. In these authorities there may be a dedicated PH team. In addition many LAs and PHAs are members of APHA (above) where they actively work together to develop policy and guidance and to share best practice. Authorities are not obliged to follow these guidance instructions.

Trading Standards departments: Trading Standards offices are responsible for carrying out functions in relation to consumer protection, animal health, fair trading, labelling, pricing and product safety.