

# BREXIT

## & THE VETERINARY & PROFESSION



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A vibrant green field of crops, likely corn, stretches across the foreground and middle ground. The sky is bright and filled with soft, white clouds, with a prominent sun flare in the upper right quadrant. The overall scene is bright and sunny, suggesting a clear day.

BVA is the national representative body for the veterinary profession in the United Kingdom (UK) and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

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# Summary of recommendations

Our overarching approach to Brexit is that existing animal health, animal welfare, public health, veterinary medicines, workforce, and environmental protection standards must at least be maintained at the same level, or a level equivalent to current EU standards, while seizing the opportunity to improve standards in accordance with evidence-based risk analysis of animal health, welfare and ethics. Any public money to replace the EU Common Agricultural Policy (CAP) should be used to support and incentivise public goods. These should encompass at least animal health and welfare, disease surveillance, biodiversity and environmental stewardship.



## Our specific recommendations are:

### Veterinary workforce

#### Short term

- R1. The UK Government should guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK, and for British vets and VNs working in the EU, at the existing level with no time limit.
- R2. The UK Government should add vets to the Shortage Occupation List or its equivalent and extend/continue to recognise existing MRPQ legislation through a transitional arrangement to mitigate against a sudden reduction in the veterinary workforce.
- R3. The RCVS should consult with the profession to define clear criteria, including an appropriate standard for veterinary education, to allow registration of vets with appropriate experience and equivalent standards of qualification and language to UK graduates, regardless of their country of origin.
- R4. The RCVS should review the data collected as part of its survey of the profession to better inform future decision making related to the veterinary workforce.
- R5. The RCVS should continue to recognise qualifications under the European Board of Veterinary Specialists.

#### Medium term

- R6. Diversify and incentivise veterinary roles in food hygiene and public health to make these roles a more attractive option for vets.
- R7. In consultation with BVA and the RCVS, the UK Government should devise an immigration system that takes account of veterinary workforce needs in the wide range of roles vets and vet nurses fulfil.

### Animal health

#### Short term

- R8. The UK Government should negotiate to establish formal links with the EU on veterinary surveillance (eg ongoing membership of the Animal Disease Notification System).
- R9. The UK Government should retain existing animal health legislation and maintain resources for veterinary surveillance to ensure no dilution of existing animal health standards and protections and, where appropriate, to avoid potential adverse consequences for human health.

Existing standards in relation to imported live animals and animal products must also be maintained.

- R10. The UK Government should reintroduce tick treatments for all cats and dogs travelling under the Pet Travel Scheme (PETS) alongside the introduction of tapeworm treatment for cats as well as dogs. This should be coupled with negotiation for the UK to become a non-EU country from which pet passports are recognised within PETS.
- R11. The UK Government should negotiate access to TRACES and other infrastructure such as vaccine banks.
- R12. The UK Government should seek to re-set its membership of the OIE.
- R13. Under the One Health concept, the UK Government should maintain existing environmental protection standards at the same level or equivalent to current EU standards.
- R14. The UK Government should introduce domestic legislation on Equine Identification; including retrospective microchipping of all horses, Local Authority-issued Fixed Penalty Notices and direct online notification of changes to key passport information direct to the central equine database.

#### Medium term

- R15. The UK Government should consult the veterinary profession on any changes it proposes to make to existing animal health and welfare legislation under the 'Henry VIII' amendment powers. Any changes should seek to ensure the regulatory environment is properly based on risk and not overly prescriptive.
- R16. The UK governments should establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health challenges.
- R17. The UK Government should use the EU Animal Health Law to identify and prioritise areas of legislation which would benefit from review ahead of/as part of trade negotiations.

### Animal welfare

#### Short term

- R18. The UK Government should ensure there is a strong, risk-based framework to protect animal health and welfare and which will endure post-Brexit. This should start from a baseline of existing animal health and welfare standards and identify and plan gradual, evidence-based steps toward improvement.

- R19. The UK Government should prioritise animal welfare and the maintenance of animal health and welfare standards in all trade negotiations to develop a unique, high standard of animal health, welfare and food hygiene as a selling point for the UK.
- R20. The UK Government should maintain resources for existing animal welfare surveillance, seeking opportunities to improve government and industry partnership working on jointly funded initiatives.
- R21. As part of negotiations around the Pet Travel Scheme (PETS), the UK Government should extend the waiting time post-Rabies vaccination to 8–12 weeks with the aim of minimising the risk of rabies incursion into the UK and simultaneously reducing illegal trade in puppies for sale via the non-commercial route.

#### Medium term

- R22. The UK governments and industry should work in partnership to develop a farm animal welfare stewardship programme funded through domestic agricultural policies. Such a scheme, focused on health and welfare outcomes, would use financial incentives for animal health, welfare, disease surveillance, biodiversity and environmental stewardship as public goods that benefit producers, consumers and wider society. Public money to replace the EU Common Agricultural Policy (CAP) should be used to support and incentivise such public goods.
- R23. The UK Government should legislate to ensure that imported goods have the same labels as home produced goods and introduce mandatory method of production and slaughter labelling with welfare outcome safeguards.

## Food hygiene and safety

#### Short term

- R24. The UK Government should continue to meet current standards for food hygiene legislation and enforcement, including veterinary certification and controls.
- R25. The UK Government should maintain a single standard for meat produced for both domestic and export markets supported by an appropriate health mark.

#### Medium term

- R26. The UK Government should undertake a major review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

- R27. The BVA Vet Futures workforce study and RCVS Graduate Outcomes project should investigate why UK veterinary undergraduates are not attracted to careers in food safety and meat hygiene, and explore measures to address the shortfall.

#### Long term

- R28. The UK Government should review the regulatory environment to ensure it is properly based on risk whilst maintaining current animal health and welfare standards.

## Veterinary medicines

#### Short term

- R29. The UK Government should guarantee the UK veterinary profession has ongoing access to all existing veterinary medicines licensed through the EU regulatory systems and existing import certificate mechanisms.
- R30. The UK Government should seek to maintain the link with the current EU veterinary medicine approval systems.
- R31. The Veterinary Medicines Directorate (VMD) should adopt existing Maximum Residue Limits (MRLs) for substances destined for use in food animals.
- R32. The UK Government should negotiate full membership at the International Cooperation on Harmonisation of Technical Requirements for Registration of Veterinary Medicinal Products (VICH).
- R33. The UK governments, in partnership with the veterinary profession and agricultural industry, should continue to play a leading role in tackling AMR by working with the EU, and internationally, to share best practice and promote responsible use.

#### Medium term

- R34. The UK Government should develop a new and innovative regulatory system, rooted in safety, quality and efficacy, which aims to attract companies to authorise and commercialise products in the UK, preferably in advance of the remainder of the EU.
- R35. The VMD should review the cascade to consider whether it is possible to allow greater flexibility regarding the use of medicinal products licensed elsewhere in the EU, and those of other partners within VICH, without stifling drug development.
- R36. The UK Government should align Maximum Residue Limit procedures for new substances with those of the EU in order to facilitate trade.

- R37. The UK Government should review the regulatory framework for UK-based research and development on veterinary medicines to ensure the UK remains an attractive place for new product R&D.

## Research and development

### Short term

- R38. The UK Government should fulfil its commitment to guarantee to underwrite any EU-funded multi-year research projects for the total period of the research grant, even after the UK leaves the EU.
- R39. The UK Government should develop a skills-based immigration policy that is commensurate with attracting the very best talent to the UK.
- R40. The UK Government should pursue a collaborative approach to the funding of biomedical research across Europe, as part of a wider global strategy for research.

### Medium term

- R41. The UK Government should link trade deals with collaborative research initiatives aimed at benefiting the UK and its trading partners beyond the EU.
- R42. The UK Government should develop a regulatory and legislative framework to ensure the UK continues to be a globally attractive place for veterinary research and development.

### Long term

- R43. The UK Government should increase its investment in private sector initiatives once EU state aid regulations cease to apply.

## Trade

- R44. Whatever agreement the UK reaches with the EU, and subsequently with third countries, the role of the veterinary surgeon in facilitating international trade via professional certification must be recognised and supported by the UK Government.
- R45. The UK Government should ensure that a trade deal or deals, in respect of animals and animal products, take account of already agreed protocols such as those applied by the EU or the OIE and are backed by appropriate veterinary certification.
- R46. The UK Government should impose import conditions for animals and animal products that are risk-based and supported by clear veterinary certified disease status.

- R47. The UK Government should ensure that veterinary intervention to ensure the appropriate standards are applied takes place at the point of production as checks at the border are insufficiently sensitive to detect risk.

- R48. The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets in order to avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards.

- R49. The UK Government should retain the Tripartite Agreement (TPA) to allow the free movement of horses between the UK, France and the Republic of Ireland.

## Devolution and Northern Ireland

Note: Recommendation R16 in the Animal health section calls on the UK governments to establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK.

- R50. The principles of collaboration and cooperation outlined in this report should be adopted should Scotland vote to become independent in order to facilitate cross-border trade and provision of veterinary services.
- R51. The UK Government, Northern Ireland Executive and Irish Government should consult on how best to ensure that the provision of professional services and trade across the Irish border is not disrupted.
- R52. DAERA and the Department of Agriculture, Food and the Marine should ensure cooperation across the border to continually improve animal health and welfare with an all-island approach.





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# Introduction

Ahead of the EU Referendum in June 2016 BVA produced a briefing for our members on the potential impact that Brexit could have on the UK veterinary profession, animal health and welfare, the agricultural sector and other areas of interest to our members. It was immediately clear that the UK's membership of the EU has had a profound effect on the day-to-day working lives of veterinary surgeons through myriad pieces of legislation on animal health and welfare, the impact that free movement of people has had on our workforce, the availability, safety and efficacy of the medicines we use, the rules that govern trade in animals and animal products, and the way our research is regulated.

Recognising the scale of these potential impacts, in response to the EU Referendum result we established a Brexit Working Group under the chairmanship of Alick Simmons, former UK Deputy Chief Veterinary Officer. The Working Group included the BVA President and Senior Vice President, BVA members with expertise and experience across all of the relevant issues, and representatives from BVA's devolved Branches in Scotland, Wales and Northern Ireland. We set ourselves the task of identifying the key issues for the veterinary profession arising from Brexit in order to inform BVA's lobbying.

Our first priority was to develop a set of overarching principles to inform our more detailed work on each of the areas. These principles, agreed by BVA Council in September 2016, set a tone for our deliberations and a challenge to the Working Group to seek the best possible outcomes for the veterinary profession, and, crucially, for animal health and welfare, in terms of maintaining our high standards and seeking opportunities to improve. Our overarching approach to Brexit is that existing animal health, animal welfare, public health, veterinary medicines, workforce, and environmental protection standards must at least be maintained at the same level, or a level equivalent to current EU standards, while seizing the opportunity to improve standards in accordance with evidence-based risk analysis of animal health, welfare and ethics. The principles are set out in full at **Annex A (page 37)**.

Due to the many and varied implications of Brexit for the veterinary profession, we set out to be inclusive from the beginning. The Working Group consulted extensively with all of the specialist and species divisions and we received comprehensive

written evidence outlining the challenges and opportunities from all parts of the profession. We have also taken oral evidence from veterinary organisations and partner organisations, such as the National Office of Animal Health (NOAH), the National Farmers' Union (NFU), and the Wellcome Trust. The full list of consultees is available at **Annex B (page 40)**. We are enormously grateful to all of these organisations for sharing their ideas and expertise to help shape this report.

Recognising the importance of developing a strong lobbying position on behalf of the veterinary profession as a whole, we have worked collaboratively with the veterinary profession's regulator, the Royal College of Veterinary Surgeons (RCVS), to achieve the best possible outcome.

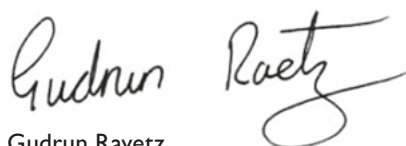
Throughout our work we have challenged ourselves to look for opportunities and to be innovative in thinking about how we manage or mitigate any identified risks. Each section in this report provides the background and context to the issues, a section on what we heard, our underlying principles, the challenges and opportunities we identified, and our recommendations for what should happen next. This report also touches on the impact of Brexit on devolution, given that animal health and welfare issues are devolved, but also underscores our strong view that efforts to control disease and promote animal welfare should be coordinated across the whole of the UK. The recommendations, listed in full in the **Summary of recommendations (page 4)**, will form the basis for our discussions with ministers and civil servants, the RCVS, and others as we enter the two-year negotiating period.

Leaving the EU may offer opportunities not enjoyed by being a member of trading bloc, for example there may be less of a need to compromise on standards, but there are also risks that need to be mitigated. Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. Achieving this requires enduring collaboration across the entire food chain with an acceptance that beneficiaries, individually and collectively, can and will be held to account for meeting the agreed standard. Confidence in a competitive, empowered and innovative industry requires independent scrutiny via agencies peopled with sufficient numbers of appropriately skilled professionals and technicians supported by evidence, academic excellence, and robust standards and processes. The veterinary profession is in a unique position to do that.

Veterinary surgeons are vital to the UK economy and in our communities. Vets work in myriad settings, including in clinical practice providing preventive healthcare and treatment for livestock, pets and leisure/sport animals, carrying out surveillance, and advancing standards of animal welfare; in

research advancing our scientific understanding; in abattoirs and throughout the food chain to secure public health, food safety and animal welfare; in industry and technology ensuring the UK remains competitive; and in government providing veterinary expertise to public policy making.

We welcomed the early pronouncements from the UK Government that it would seek to establish the UK's 'unique selling point' as one of high animal welfare and food safety standards. We echo this view and underline the vital importance of the veterinary profession in achieving it. This report sets out how we think it can be achieved. We see this report very much as the start of that process, and we are willing and able to assist the UK Government as negotiations develop.



**Gudrun Ravetz**  
**BVA President 2016–17**

## Members of the Brexit Working Group



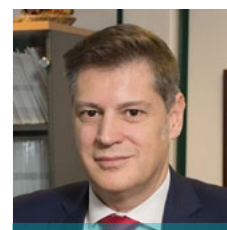
**Alick Simmons**  
Chair



**Gudrun Ravetz**  
BVA President 2016–17



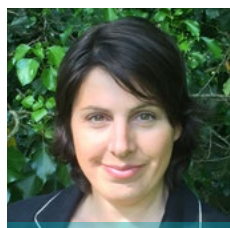
**Sean Wensley**  
BVA Senior Vice President 2016–17



**Juan Avila**



**Madeleine Campbell**



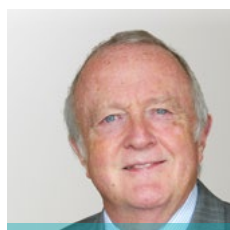
**Sarah Carr**



**Sandy Duncan**



**Pete Goddard**



**Peter Jones**



**Bill McKelvey**



**John O'Neill**

# Veterinary workforce

## Context

The UK veterinary profession is an integral part of the international scientific community using evidence and practical skills to further animal health and welfare and public health. It is a diverse profession with far-reaching influence and impact in many areas of political and public life. Vets work in myriad settings, including in:

- production animal clinical practice providing preventive healthcare and treatment for livestock, as well as carrying out surveillance, promoting good biosecurity, boosting productivity and maintaining standards of animal welfare;
- companion animal and equine practice looking after family pets, leisure and sport animals as part of the local community;
- research laboratories and lecture theatres advancing our scientific understanding;
- abattoirs and throughout the food chain to secure public health, food safety and animal welfare;
- industry and technology ensuring the UK remains competitive and forward thinking; and
- government providing veterinary expertise to public policy making.

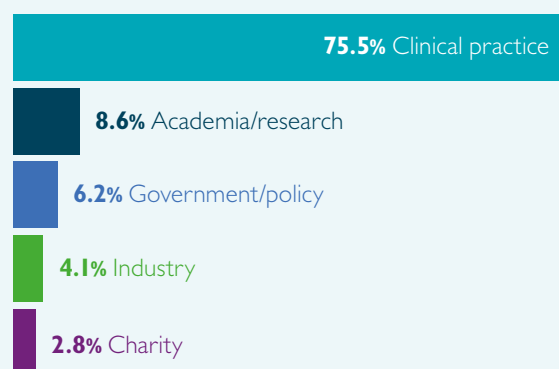
Vets are vital to the UK economy. Official statistics put the value of UK livestock outputs at £13 billion, not a penny of which could be realised without the input of a thriving, sustainable veterinary workforce. The Pet Food Manufacturers' Association Pet Population 2016 report estimates that 11 million (40% of) UK households have pets and the pet population stands at around 57 million (PFMA, 2016). The UK horse industry contributes £8 billion annually to the UK economy and is the country's second largest rural employer (Equine Sector Council, 2017). In addition to this, a report commissioned by the Department for Business, Education and Skills found that in 2012/13 research and development (R&D) income for veterinary science totalled £55 million (Department for Business, Education and Skills, 2015).

EU veterinary surgeons are vital to the UK veterinary workforce. Statistics from the Royal College of Veterinary Surgeons (RCVS) reveal that a significant proportion of the UK veterinary

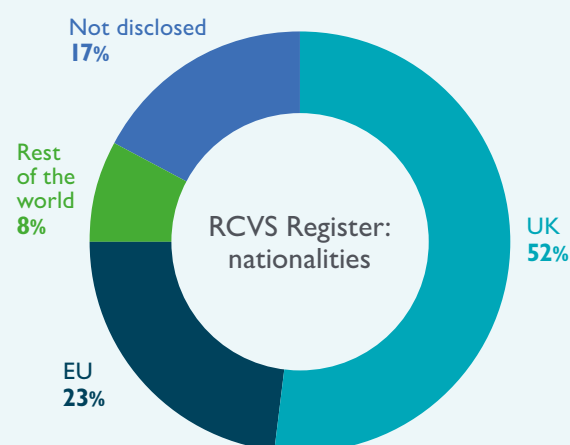
workforce graduated overseas, the vast majority from non-UK EU universities. In 2014, the proportion of new registrants in that year from non-UK EU vet schools was 43% (RCVS, 2014).

In recognising the importance of EU-graduated vets and veterinary nurses (VNs), without whom there would be deficits throughout the veterinary workforce, BVA has been lobbying for the UK governments to guarantee the status of non-British EU vets and VNs currently working and studying in the UK, and for British vets and VNs working in the EU.

### Main areas of employment for vets in the UK



Source: RCVS Survey of the profession 2014



Source: RCVS Register, data extracted 24 August 2016

## Principles

With this context in mind, we have adopted the following principles:

- P1. Working rights for non-British EU vets and veterinary nurses currently working and studying in the UK, and for British vets and VNs working in the EU, must be guaranteed at the existing level with no time limit.
- P2. New systems for immigration must take account of veterinary workforce needs and the demand for veterinary surgeons and nurses in the wide range of roles they fulfil, including taking into account flexible working and career breaks, and consideration of the inclusion of veterinary medicine on the Shortage Occupation List.
- P3. RCVS should have the power to determine the recognition of veterinary qualifications and language competency requirements.

## What we heard

Under EU Directive 2005/36/EC on the Mutual Recognition of Professional Qualifications (MRPQ), the RCVS must register vets with qualifications awarded by European institutions that are recognised in another EU or European Economic Area (EEA) Member State. EU veterinary schools can be accredited by the European Association of

Establishments for Veterinary Education (EAEVE). However, even where veterinary schools are not accredited or do not meet the same standard as the UK, their qualifications must be recognised and this has been raised with BVA as a source of concern for a number of years. There is a statutory exam for non-EU registrants whose qualifications are not automatically recognised by the RCVS and applicants must reach level 7 of the International English Language Testing System (IELTS) before applying to sit this exam.

EU veterinary surgeons make a particularly strong contribution to public health-critical roles, such as working in the Government Veterinary Services<sup>1</sup>. In the meat hygiene sector alone, some estimates suggest 95% of Official Veterinarians (OVs) working in abattoirs graduated overseas with the vast majority of these being non-UK EU graduates. Approximately 45% of Government Veterinary Services posts are fulfilled by non-UK EU vets and many non-UK EU vets also work in aquaculture and bovine tuberculosis (TB) testing.

In 2011, the veterinary profession was removed from the Home Office Shortage Occupation List because the Migration Advisory Committee made an assessment that there were sufficient veterinary surgeons to meet demand. However, this move did not anticipate the possible loss of non-UK EU graduates from the veterinary workforce. Currently, the Major Employers Group (MEG), representing large veterinary practices and corporate groups that employ around 13% of the UK workforce predominantly in small animal veterinary practice, estimates that 30% of their combined workforces

<sup>1</sup> Government Veterinary Services are part of the Civil Service that supports public sector veterinary professionals and promotes veterinary policy to other vets and the public



are non-UK EU graduates and these figures are borne out by RCVS data. MEG has also found that a higher proportion of non-UK EU graduates work full-time hours compared to UK-graduated veterinary surgeons. This therefore increases their overall dependency on non-UK EU vets to above that of 30%.

Non-UK EU nationals make up 22% of veterinary surgeons working in veterinary academia in the UK (Veterinary Policy Research Foundation, 2016), the majority of whom will be in roles directly linked to providing education and training within the undergraduate veterinary degree. Without non-UK EU vets, there may not be enough appropriately qualified vets to meet workforce needs.

Before the EU referendum, UK veterinary practices were reporting difficulties in recruiting, with a BVA Voice of the Veterinary Profession (Voice) survey in early 2015 revealing that 40% of practices with vacancies had taken more than three months to recruit in the last year, or had withdrawn the vacancy due to a lack of suitable candidates (BVA, 2015). In the November 2016 Voice survey, members were asked whether the result of the EU referendum had affected recruitment of veterinary surgeons to their own organisation and approximately one fifth reported that it had become harder to recruit (BVA, 2016). According to the Veterinary Public Health Association (VPHA), in the meat hygiene sector employers have seen a significant decrease in applications for veterinary roles since the referendum. In the November Voice survey, 61% of those asked agreed that for the purposes of post-Brexit immigration the veterinary profession should be considered a shortage occupation (defined as an occupation for which there are not enough resident workers to fill vacancies).

BVA and RCVS are undertaking studies on separate aspects of the veterinary workforce and the challenges they are facing irrespective of Brexit. We hope that the findings will help to influence the development of a flexible and skilled workforce which meets society's needs. A major consideration is striking the right balance between producing 'home grown' graduates from UK veterinary schools and bringing in appropriately qualified and skilled foreign graduates to maintain a thriving workforce. One consideration may be to increase the number of veterinary student places available with a concomitant increase in funding for veterinary education. However, we caution against this option being the panacea. Any increase in veterinary students may be a long term and gradual position, but as a substantial solution there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

The Prime Minister has reiterated the UK Government's commitment to its manifesto pledge to reduce net migration to 100,000 per year by 2020 (Daily Telegraph, 2016). The RCVS currently registers around 1000 overseas vets per year, of which EU nationals make up the vast majority. It seems unlikely this level could be sustained if the Government is to meet its target.

## Challenges

- Maintaining the UK veterinary workforce is essential. If the supply of overseas graduates, particularly from the EU 27, is slowed or stopped, then the UK will need to maximise retention of veterinary surgeons and incentivise roles in food hygiene and public health. Whilst retention has been recognised as a pre-Brexit problem it has been exacerbated since the referendum due to uncertainty about ongoing rights to employment.
- Vets working in food hygiene and public health in the UK are vital for the protection of the UK consumer; they both certify and supervise the import and export of animals and animal products to third countries. In a scenario where the UK is trading under World Trade Organisation (WTO) rules, there is likely to be an increased requirement for vets to fulfil these crucial roles. See **Food hygiene and safety (page 24)** for further detail.
- Routes for post-graduate qualifications and specialisation must be maintained. The more widely recognised a qualification, the greater its value, such as post-graduate qualifications validated through the European Board of Veterinary Specialists. In some cases, there is no equivalent specialist body in the UK.

In October 2016 Health Secretary Jeremy Hunt announced Government plans to fund training for up to 1500 more doctors every year in England from September 2018 in order to expand the number of home grown doctors to replace doctors recruited from overseas, who currently make up 25% of the medical workforce (Department of Health, 2016). Were the veterinary sector to be charged with producing more 'home grown' vets, the major challenges include:

- Infrastructure – the seven UK veterinary schools (and the University of Surrey<sup>2</sup>) would need significant infrastructure investment and expansion to be able to take on more veterinary students.

<sup>2</sup> The first cohort of students at the University of Surrey is in its third year of the course in 2017. The process of recognition for a new veterinary degree takes a number of years, as approval cannot be considered until after the RCVS undertakes a formal inspection of a full course and its standards, once the first cohort of students have completed their degrees. For the University of Surrey this will take place in 2019.

- Teaching – a fifth of the current veterinary teaching workforce are EU nationals. Restrictions on EU immigration would impact on the availability of high quality teaching staff to accommodate a growth in the veterinary student population.
- Extra-mural studies (EMS) provision – significant pressure already exists on veterinary practices to provide EMS placements for UK veterinary students. It is unclear whether capacity exists to expand this provision.
- Students – although veterinary science remains a popular and competitive degree programme some UK schools have seen a reduction in applications, and increasing the number of home grown students would likely be in direct competition with medicine which is drawing from the same pool of students achieving high grades in science A-levels.

## Opportunities

- Increased selectivity over vets who can register in the UK to take account of workforce needs, appropriate qualifications, experience and language skills, irrespective of their country of origin.
- EAEVE accreditation could be made compulsory for RCVS recognition of European veterinary qualifications.
- Scope to make it easier to employ vets from outside the EU based on competency and business need via the Shortage Occupation List or an equivalent.
- Ensure UK veterinary undergraduate qualifications remain amongst the best.
- Create a climate to attract and retain the brightest and best veterinary surgeons irrespective of country by enhancing the role and public value of the veterinary profession within public health and animal health and welfare.

## Recommendations

### Short term

- R1. The UK Government should guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK, and for British vets and VNs working in the EU, at the existing level with no time limit.
- R2. The UK Government should add vets to the Shortage Occupation List or its equivalent and extend/continue to recognise existing MRPQ legislation through a transitional arrangement to mitigate against a sudden reduction in the veterinary workforce.
- R3. The RCVS should consult with the profession to define clear criteria, including an appropriate standard for veterinary education, to allow registration of vets with appropriate experience and equivalent standards of qualification and language to UK graduates, regardless of their country of origin.

- R4. The RCVS should review the data collected as part of its survey of the profession to better inform future decision making related to the veterinary workforce.
- R5. The RCVS should continue to recognise qualifications under the European Board of Veterinary Specialists.

### Medium term

- R6. Diversify and incentivise veterinary roles in food hygiene and public health to make these roles a more attractive option for vets.
- R7. In consultation with BVA and the RCVS, the UK Government should devise an immigration system that takes account of veterinary workforce needs in the wide range of roles vets and vet nurses fulfil.



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# Animal health

## Context

The UK enjoys an increasingly good animal health status, but maintaining this requires a continuing commitment to effective veterinary surveillance, comprehensive preparedness and sophisticated and scalable responses to incidents and incursions. In its broadest sense, animal health can be said to cover every aspect of disease control, prevention and treatment all of which are areas that rely upon the knowledge and skill of veterinary professionals. This section is focused primarily on aspects of animal health which have been directly impacted by the UK's membership of the EU. However, as part of BVA's commitment to One Health we also recognise the importance of maintaining standards of environmental protection (eg the EU Directives on Birds and Habitats) and human health.

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**BVA considers animal health within the wider concept of One Health, which is generally defined as 'a worldwide strategy for expanding interdisciplinary collaborations and communications in all aspects of health care for humans, animals and the environment' (One Health Initiative, 2017).**

A high proportion of UK Government animal health policy is enacted via EU legislation in the form of either Directives or Regulations<sup>3</sup>. As well as addressing exotic diseases, such as rabies, avian influenza (AI), foot and mouth disease (FMD) and African horse sickness, the legislation includes measures to address endemic diseases such as bovine brucellosis and bovine tuberculosis. The latter require systematic measures including targeted surveillance, movement controls and 'stamping-out,' which if implemented correctly form the basis of trade in the relevant animals and in part animal products as the foundation for the recognition of area and national freedom or to regain status following an incursion. **Trade** is discussed further in a separate chapter ([page 32](#)).

In addition to control programmes for endemic disease and the capability to respond to exotic disease, surveillance for new and emerging disease (a policy which is not mandated by EU legislation), and for the incursion of disease exotic to the UK, are important elements of animal health policy and its implementation. Effective systems provide for:

- early detection, characterisation and risk assessment of new and emerging diseases enabling decisions on appropriate interventions.
- rapid detection and early response to exotic disease incursion, thereby ensuring effective control and prompt eradication.

More general EU legislation covering the identification and movement of animals and the disposal of animal waste has been enacted to underpin specific disease measures. Beyond this, there are rules which protect the borders of the EU (the 'Vet Checks' Directives) from incursion of disease and associated public health risks by regulating the importation of animals and animal products from third countries.

EU Member States, including the UK, recently agreed a Regulation on transmissible animal diseases (known as the Animal Health Law) providing the means to streamline the current rules into a single law which has been welcomed as more flexible, risk-based and proportionate. Despite this more strategic approach, there has been little broadening of scope and the new rules will only be applicable once the subordinate legislation (delegated and implementing acts) has been agreed, which will take until April 2019.

One controversial area involving the movement of small animals (ie dogs, cats and ferrets) is covered by either EU Regulation No 576/2013 (the so-called Pet Travel Scheme or PETS) and, for commercial movement, EU Directive 92/65/EEC (the 'Balai Directive'). Whilst PETS has made the transport of pets between the UK and mainland Europe easier and more cost effective for owners, the removal of the requirement for tick treatments has increased the risk of UK exposure to tick species not native to the UK and the potentially zoonotic vector-borne diseases they may carry.

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<sup>3</sup> A **directive** is a legal act of the European Union, which requires Member States to achieve a particular result without dictating the means of achieving that result. It can be distinguished from an EU **regulation** which is self-executing and does not require any implementing measures other than enforcement powers.



**To address the risk of exposure to non-native tick species and potentially zoonotic vector borne diseases, BVA has called for the re-introduction of tick treatments for all cats and dogs travelling under PETS alongside the introduction of tapeworm treatment for cats as well as dogs. Tighter border controls may also be of benefit to better regulate, and perhaps reduce, the commercial importation of puppies into the UK for onward retail. This matter is addressed further in our section on Animal welfare (page 20).**

## Principles

With this context in mind, we have adopted the following principles:

- P4. There must be no dilution of existing animal health protections and these should be reinforced wherever reasonable and proportionate.
- P5. Resources for existing disease control and eradication programmes and surveillance systems should at least be maintained, and the UK should seek opportunities to improve industry/government collaboration on jointly funded programmes.
- P6. Reciprocal surveillance data sharing with Europe and internationally must be maintained, and the UK must maintain effective and adequately resourced systems for detecting new and emerging diseases.
- P7. Existing standards (including welfare) in relation to imported live animals and animal products must be maintained.
- P8. Where animal health legislation is reviewed, the UK should seek opportunities to ensure the regulatory environment is properly based on risk and not overly prescriptive, in order to reduce unnecessary administrative burden.

## What we heard

The recently agreed EU Animal Health Law is recognised as well thought out, practical and flexible base-line legislation to which the UK's contribution was significant. It provides a platform for the reform of the legislative and policy detail of

disease control as obligations for Member States and farmers in respect of surveillance and standards on farm. However, it also includes measures to list multi-resistant bacteria as transmissible disease and classifies rabbits as food-producing animals, which could have unintended consequences for companion animals. Consideration should be given to whether the Animal Health Law will form part of the *Acquis Communautaire* copied across into domestic legislation or whether separate UK legislation will be needed.

A robust surveillance system is vital to the health of UK livestock and the free sharing of animal health surveillance data would benefit such a system. It will be important to ensure that capacity and capability of the surveillance system, which has been under financial pressure in recent years, is maintained at an appropriate level irrespective of legislative requirements post-Brexit. An effective, publicly-funded system could work in partnership with the private sector to collect and share this and other sources of data to inform the livestock sector about trends in endemic disease. Surveillance in companion animals, on the other hand, does not exist on anywhere near the same scale. Existing infrastructure could be enhanced in order to address areas with a potential impact on human health, eg zoonotic disease and antimicrobial resistance.

Consideration will need to be given to the status of the UK for the purposes of the Pet Travel Scheme to facilitate a smooth transition from day zero post-Brexit. The UK may be required to become a listed country or the EU could continue to recognise UK pet passports in the same way it does for Switzerland, Norway, Andorra and others. Alternatively, owners may be required to get a new UK passport or third country certification before travelling with their pet. The UK is currently establishing a Central Equine Database in order to comply with the revised EU Regulation on Equine Identification (EU 2015/262) – a move that BVA fully supports.

Movement of animals, semen and embryos within the EU is currently facilitated by the Trade Control and Expert System (TRACES) system. Vets working within the zoo and wildlife sectors also rely on TRACES for movements of zoo animals (necessary for European Endangered Species Programmes and general zoo welfare management) and UK zoo breeding populations risk becoming genetically isolated without the ability to trade easily with the EU.

In the event that the UK pursues a bilateral trade agreement with the EU, it may find itself in a situation where it is required to comply with EU legislation for trade purposes, but is unable to influence the development of the legislation. Existing relationships with the Federation of Veterinarians of Europe (FVE), the Federation of European Companion Animal Veterinary Associations (FECAVA) and the Federation of European Equine Veterinary Associations (FEEVA) may enable

future input into EU decision making. The UK is currently represented at the World Organisation for Animal Health (OIE) as a Member State of the EU, but following Brexit the UK will need to re-engage with the OIE as a separate entity.

The UK has numerous disease reference laboratory<sup>4</sup> designations many of which have been awarded by the EU. These include the Animal and Plant Health Agency (eg avian influenza), the Pirbright Institute (eg foot and mouth disease) and the Centre for Environment, Fisheries and Aquaculture Science (crustacean diseases). These designations will be lost when the UK leaves the EU, along with the funds that accompany them. There is also the risk of the loss of scientific influence and collaboration that these designations tend to engender.

Ongoing access to veterinary medicines will be crucial for the maintenance of animal health in both food producing animals and companion animals. Concerns related to this matter are addressed in the **Veterinary medicines chapter (page 26)**.

## Challenges

- Animal health challenges posed by Brexit will vary depending on the outcome of the exit negotiations. Whatever the outcome, the biggest challenge is establishing an animal health policy with no dilution of current standards, which suits all animal keepers, but in particular the UK livestock industry and the risks it seeks to manage while maintaining the confidence of both UK consumers and foreign governments.
- Although the Prime Minister has indicated that the UK will no longer be a member of the Single Market (Prime Minister's Office, 2017), the way in which the UK exits the EU will impact on animal health policy. Withdrawing from the Single Market might presage calls for deregulation and a reduction in surveillance as the UK relies on simple bilateral trade agreements which introduce a plethora of different voluntary standards. On the other hand, a 'soft Brexit' with the UK staying in the Single Market may require retention of most, or perhaps all, EU animal health laws at an equivalent standard for this market.

- Agricultural policy in the UK is devolved. As an EU Member State the UK has been able to maintain a degree of coherence to agricultural policy amongst all four administrations, but following Brexit there is increased scope for divergence of these policies. Coordination and oversight on matters of animal health is crucial. This issue is discussed in more detail in the **Trade (page 32)** and **Devolution (page 34)** chapters.

## Opportunities

Most EU animal health legislation is fit for purpose, but there are instances where EU legislation is overly prescriptive and neither risk-based nor proportionate, either because it was ill-drafted or because the risk has changed over time. Animal health-related opportunities arising from Brexit include:

- Update and improvement of legislation designed to address exotic disease. More recently revised legislation such as the Foot and Mouth Disease and Avian Influenza Directives are effective and proportionate while those for classical swine fever and bluetongue are overly prescriptive.
- UK re-setting its relationship with the World Organisation for Animal Health (OIE).
- Development of a body to oversee and coordinate animal health policy amongst the devolved administrations and to facilitate partnership working between industry and government to tackle endemic disease and animal health challenges.
- Adoption of the EU Animal Health Law as part of the Great Repeal Bill, with subordinate legislation considered as it arises to be adopted in a risk-based manner.

The degree to which these opportunities can be realised will be influenced by the nature of any trade agreement with the EU and other countries since foreign governments will expect standards applied to be similar to or exceed those with whom we trade in animals and animal products.

<sup>4</sup> A disease reference laboratory is designated to pursue scientific and technical problems relating to a named disease. Designation as a reference laboratory may be at a national level, on behalf of the EU or on behalf of the OIE. These designations are awarded to laboratories with a record of excellence in the named disease for meeting other criteria. EU designated laboratories receive funding but those designated by the OIE do not.

The laboratory should lead active research in relation to the disease and provide scientific and technical assistance and expert advice on topics linked to diagnosis and control of the disease for which the Reference Laboratory is responsible. Reference laboratories also provide scientific and technical training for personnel from other countries, and coordinate scientific and technical studies in collaboration with other laboratories or organisations.



## Recommendations

### Short term

- R8. The UK Government should negotiate to establish formal links with the EU on veterinary surveillance (eg ongoing membership of the Animal Disease Notification System).
- R9. The UK Government should retain existing animal health legislation and maintain resources for veterinary surveillance to ensure no dilution of existing animal health standards and protections and, where appropriate, to avoid potential adverse consequences for human health. Existing standards in relation to imported live animals and animal products must also be maintained.
- R10. The UK Government should reintroduce tick treatments for all cats and dogs travelling under the Pet Travel Scheme (PETS) alongside the introduction of tapeworm treatment for cats as well as dogs. This should be coupled with negotiation for the UK to become a non-EU country from which pet passports are recognised within PETS.
- R11. The UK Government should negotiate access to TRACES and other infrastructure such as vaccine banks.
- R12. The UK Government should seek to re-set its membership of the OIE.

- R13. Under the One Health concept, the UK Government should maintain existing environmental protection standards at the same level or equivalent to current EU standards.
- R14. The UK Government should introduce domestic legislation on Equine Identification; including retrospective microchipping of all horses, Local Authority-issued Fixed Penalty Notices and direct online notification of changes to key passport information direct to the central equine database.

### Medium term

- R15. The UK Government should consult the veterinary profession on any changes it proposes to make to existing animal health and welfare legislation under the 'Henry VIII' amendment powers. Any changes should seek to ensure the regulatory environment is properly based on risk and not overly prescriptive.
- R16. The UK governments should establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health challenges.
- R17. The UK Government should use the EU Animal Health Law to identify and prioritise areas of legislation which would benefit from review ahead of/as part of trade negotiations.

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# Animal welfare

## Context

A matter of significant public concern within the UK (Mayfield, et al., 2007) (Clark, et al., 2016), animal welfare is inextricably linked with animal health (see chapters on **Animal health, page 16** and **Veterinary medicines, page 26**), with public health, and with One Health issues such as antimicrobial resistance. Animal health and welfare is an international issue, which is impacted upon by trading agreements and by national (including devolved) and international legislation.

In the UK animal welfare policy is devolved and is currently legislated for by a combination of national legislation (eg the Animal Welfare Act 2006, The Welfare of Farmed Animals (England) Regulations, and their devolved equivalents); international treaties, such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and World Organisation for Animal Health (OIE) guidelines on animal welfare; and EU legislation. Around 80% of UK animal welfare legislation originates from the EU via 44 EU animal welfare laws, which cover: farm animals (17 laws); wildlife (11 laws); animals in research (nine); and companion animals (four) (Veterinary Policy Research Foundation, 2016).

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**BVA's position on the role of the veterinary profession in relation to animal welfare ([www.bva.co.uk/policy](http://www.bva.co.uk/policy)) states that improving animal welfare should be the profession's primary aim and motivation. It is recognised that neither sentiment nor economic factors can be entirely divorced from animal welfare considerations, yet they should never be paramount in its consideration. It also notes that veterinary surgeons in the UK make a declaration upon registration that 'above all, my constant endeavour will be to ensure the health and welfare of animals committed to my care.'**

## Principles

With this context in mind, we have adopted the following principles:

- P9. There must be no dilution of existing animal welfare standards and legislation and the UK should seek opportunities to improve animal welfare, for example in relation to the export/import of live animals, mandatory method of production labelling, and the labelling of non-stun slaughter.
- P10. The unique selling point of "UK PLC" should be high animal welfare and food safety standards.
- P11. The maintenance of animal welfare standards should be integral to the negotiation of new trade agreements.

## What we heard

Currently, there is legislation to define minimum standards for animal welfare, which BVA supports. However, where standards are out of date they must be updated and where they do not exist they must be created. The UK must at least maintain these standards in order to trade on the unique selling point of high animal welfare and food safety standards and it is important that they do not drop, even in situations where exports are made to countries where animal welfare standards are lower. Our approach to animal welfare is outlined in our [Animal Welfare Strategy \(\[www.bva.co.uk/policy\]\(http://www.bva.co.uk/policy\)\)](#) (BVA, 2016).

Welfare at slaughter is a priority for both BVA and the wider UK public; nearly 120,000 people supported our e-petition calling for an end to non-stun slaughter to improve animal welfare at the time of death. Whilst the UK is free to ban non-stun slaughter under the derogation in Council Regulation (EC) No 1099/2009 on the Protection of Animals at the Time of Killing, the UK Government has repeatedly resisted calls to do so, and argued that compromise measures such as labelling could only be introduced EU wide. Brexit therefore presents an opportunity to introduce mandatory method of production labelling, including method of slaughter, with welfare outcome safeguards. As part of the campaign on welfare at slaughter, BVA supports the recommendations in the February 2015 Farm Animal Welfare Committee (FAWC) opinion report on Closed Circuit Television (CCTV) in slaughterhouses.

**BVA's position on non-stun slaughter states that all animals should be stunned before slaughter. If slaughter without stunning is still to be permitted, then any meat or fish from this source must be clearly labelled and should include requirements relating to animal welfare outcome safeguards. This will enable consumers to fully understand the choice they are making when purchasing such products.**

**BVA has also called for mandatory CCTV in slaughterhouses and legislation to ensure vets have unrestricted access to slaughterhouse CCTV footage.**

According to a 2014 survey by World Animal Protection, the UK is currently considered to be amongst the top four countries for animal welfare (EU Energy and Environment Sub-Committee, 2017). Furthermore, a poll by the RSPCA suggested that eight out of ten people want animal welfare laws improved or at least kept the same after the UK leaves the EU (RSPCA, 2017).

Building and strengthening the UK's brand for animal welfare will rely on utilising the opportunities that Brexit may provide to unilaterally improve standards of welfare – for example in export markets, and in areas which can attract business into the UK, eg access to high standard animal research facilities which aim to minimise the use of animals in research. Defra has stated that enhanced health and welfare will increase industry profitability (Defra, 2004). However, such opportunities could be limited by the terms of future trade agreements, which sometimes conflict unnecessarily with the aims of animal welfare strategies. An understanding of strategic animal welfare priorities for the UK within a One Health context and consideration of a long-term plan for food and farming are therefore important components of future trade agreement negotiations. In relation to animal health and welfare, the aim of Brexit negotiations should be to provide a competitive, enduring, risk-based framework which will promote and develop a unique, high-standard health and welfare selling point for the UK. A market exists for high standards of animal welfare.

We note that both the Farm Animal Welfare Committee (FAWC; previously the Farm Animal Welfare Council, 2011) and the Veterinary Development Council (Veterinary Development Council, 2012) have made recommendations that the UK governments should work with industry to actively protect animal health and welfare and that this should

include consideration of a farm animal welfare stewardship programme. Such a scheme, focussed on health and welfare outcomes, would use financial support for animal welfare as a public good, as has been the case for environmental stewardship (which should continue). In 2014, the FAWC set out a proposed approach to developing such a stewardship programme starting with limited trials in each of the main livestock sectors (FAWC, 2014). Financial incentives focused on animal welfare outcomes are trade compatible under the World Trade Organisation rules (RSPCA, 2016).

**BVA's position on transporting animals states that slaughter should take place as near to the point of production as possible so that animals are transported on the hook (as meat) not on the hoof (as live animals).**

Since the introduction of the Pet Travel Scheme (PETS), covering the travel of pet dogs, cats and ferrets, BVA has heard concerns about the illegal entry of dogs into the UK under the scheme. Almost a third of vets working in companion animal practice have had concerns in the last twelve months that puppies they saw had been imported illegally (BVA, 2016) and BVA has raised concerns with Defra over the level of controls and checks at our borders. It has been suggested that extending the waiting time post-Rabies vaccination to 8–12 weeks would have two benefits, firstly in reducing the likelihood of disease incursion (Greene, 2011) and secondly, in reducing the misuse of non-commercial movement routes for the illegal import of puppies for sale. Trade in non-traditional companion animals (NTCAs), exotic and wildlife species, with particular reference to wild-caught animals, would also benefit from tighter control and could build upon existing protections such as the 2007 EU ban on wild bird imports.

The export of live animals remains a concern and is expanded upon in [BVA's existing position on transporting animals \(www.bva.co.uk/policy\)](http://www.bva.co.uk/policy).

## Challenges

- Upholding current standards of animal welfare during trade negotiations (eg the UK could be obliged to import meat produced under lower welfare conditions than would be acceptable in the UK).

- Maintaining consistency in welfare standards across the devolved regions. Post-Brexit, standards may diverge and this could have a detrimental impact on animal welfare as well as the disease risk and response capability for the UK.
- Ensuring that baseline standards for animal welfare are good enough for trade and regularly updated to ensure that we do not end up with domestic and export standard abattoirs. This could dilute animal welfare standards overall, and make exports more difficult.

## Opportunities

- Increasing welfare standards at slaughter, including mandatory pre-stunning and CCTV in all abattoirs with unrestricted access for vets.
- Considering the welfare issues around the transport and export of live animals.

- Developing an enduring, risk-based framework, which from day one will promote and develop a unique, high standard animal health and welfare selling point for the UK.
- Prioritising animal welfare during trade negotiations.
- The UK has the opportunity to become a stronger influence for positive animal welfare in the OIE.
- Implementation of measures to promote improved welfare which are currently too complex to implement under EU law eg mandatory method of production labelling with welfare outcome safeguards and labelling for method of slaughter.
- Renegotiation of PETS including the reintroduction of mandatory tick and tapeworm treatment and measures to reduce illegal importation of puppies for sale.

## Recommendations

### Short term

- R18. The UK Government should ensure there is a strong, risk-based framework to protect animal health and welfare and which will endure post-Brexit. This should start from a baseline of existing animal health and welfare standards and identify and plan gradual, evidence-based steps toward improvement.
- R19. The UK Government should prioritise animal welfare and the maintenance of animal health and welfare standards in all trade negotiations to develop a unique, high standard of animal health, welfare and food hygiene as a selling point for the UK.
- R20. The UK Government should maintain resources for existing animal welfare surveillance, seeking opportunities to improve government and industry partnership working on jointly funded initiatives.
- R21. As part of negotiations around the Pet Travel Scheme (PETS), the UK Government should extend the waiting time post-Rabies vaccination to 8–12 weeks with the aim of minimising the risk of rabies incursion into the UK and simultaneously reducing illegal trade in puppies for sale via the non-commercial route.

### Medium term

- R22. The UK governments and industry should work in partnership to develop a farm animal welfare stewardship programme funded through domestic agricultural policies. Such a scheme, focused on health and welfare outcomes, would use financial incentives for animal health, welfare, disease surveillance, biodiversity and environmental stewardship as public goods that benefit producers, consumers and wider society. Public money to replace the EU Common Agricultural Policy (CAP) should be used to support and incentivise such public goods.
- R23. The UK Government should legislate to ensure that imported goods have the same labels as home produced goods and introduce mandatory method of production and slaughter labelling with welfare outcome safeguards.



# Food hygiene and safety

## Context

The UK applies EU regulations regarding meat hygiene through the Food Standards Agency (FSA) and their inspection teams, which are led by Official Veterinarians (OVs). These regulations require official controls guaranteeing animal health and welfare and protecting public health to be carried out and enforced by OVs.

The vast majority of OVs supervising slaughterhouses in the UK come from other EU Member States. In part, this is because veterinary schools in other EU countries place a greater emphasis on public health critical work through the veterinary degree and on the role of the OV, requiring them to supervise all food premises where the food is of animal origin. Students at UK veterinary schools do not demonstrate the same level of interest in meat hygiene work, with only 6% of students expressing an interest in “government work” (Vet Futures, 2015). Within the workforce, the Veterinary Public Health Association (VPHA) estimates that only 4% of OVs are UK or Commonwealth graduates.

We are very pleased to note that the UK Government has signalled its understanding of the importance of maintaining high standards in both food safety and animal welfare. Speaking at the National Farmers' Union (NFU) conference in February 2017, Defra Secretary of State Andrea Leadsom said: “British food is renowned and respected for its high standards of animal welfare, food safety, and food traceability. It’s one of the most compelling reasons for consumers to buy British.” Vets are integral to meeting these high standards and uniquely qualified to identify notifiable diseases, including zoonoses (diseases that transmit between animals and humans), to recognise poor welfare standards, and to provide independent certification.

## Principles

With this context in mind, we have adopted the following principles:

- PI2. Food hygiene legislation and enforcement, including that for meat hygiene, must be maintained at the current standard or an internationally-recognised equivalent.
- PI3. Veterinary involvement from farm to fork underpins animal health, welfare, public health and food safety. Therefore, veterinary certification and controls to facilitate international trade must be maintained to ensure high standards.

### The role of the Official Veterinarian

Regulation (EC) 854/2004 sets out a requirement for all abattoirs to have an Official Veterinarian (OV). In the UK OVs are appointed to conduct work on behalf of the FSA and the Animal & Plant Health Agency (APHA). Responsibilities include:

- Ante- and post-mortem inspections of animals and carcasses.
- Animal welfare – conducting clinical examinations and ensuring that animals are slaughtered humanely.
- Animal and public health – undertaking surveillance to detect signs of disease that may affect human and/or animal health.
- Auditing good hygiene practices.

The World Organisation for Animal Health (OIE) has emphasised the importance of the role of veterinary surgeons in abattoirs (World Organisation for Animal Health, 2017):

“[The] OIE has identified animal production food safety as one of its high priority initiatives. The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-borne zoonoses, even when animals are not clinically affected... The OIE will continue to publicise and promote the fundamental role of the Veterinary Services in the area of food safety, both on-farm and at the abattoir level.”

It cites the detection of foot and mouth disease in an abattoir in 2001 as an illustration of the essential role of OVs:

“[The] OIE still considers abattoirs to be key points in epidemiological surveillance for zoonoses as well as other animal diseases. The fact that the first case detected during the foot and mouth disease epizootic in the United Kingdom in 2001 was in a pig abattoir clearly illustrates the relevance of this approach and the danger should it be called into question.”



- PI4. Where food safety (including meat hygiene) legislation is reviewed, the UK should seek opportunities to ensure the regulatory environment is properly based on risk whilst maintaining current health and welfare standards.

## What we heard

The role of veterinary surgeons in protecting animal health, welfare and public health (encompassing meat hygiene) is considered essential throughout the EU and underpins all trade, as well as providing assurances for domestic consumers. Given that the current OV workforce relies heavily on non-British EU vets, there are significant concerns within the meat processing industry about the potential impact of a post-Brexit veterinary workforce shortage on the UK agri-food sector, estimated to be worth £108 billion in direct terms to the economy in 2014 (NFU, 2017), which would impact on the UK's ability to meet its international animal health, public health, and animal welfare obligations (see **Veterinary workforce, page 11**, for more detail).

Many countries require veterinary certification of products of animal origin. As advocates for animal welfare, it should be veterinary surgeons that perform these critical roles. Post-Brexit the UK will be treated as a third country by the EU for the purposes of exports and imports. In this situation, there may be increased demand for veterinary certification and supervision, which would require more OVs than are currently employed in the sector. A major review of current UK capacity for third country certification should be an early priority to ensure the UK can facilitate trade post-Brexit.

OVs are vital in abattoirs and any reduction in their role would be a detrimental step for animal health and welfare, public health, and UK trade. BVA opposes any system that would introduce two standards of production, processing or certification for domestic and export markets because it would increase the risk of food fraud, potentially compromise animal welfare, and leave the UK unable to provide public health guarantees to consumers. Without vets to ensure consumer and business confidence in the UK agri-food business there is the risk of a negative impact on the UK's future export capability.

## Challenges

- Maintaining a single standard of certification for domestic and export markets.
- Attracting and retaining a sufficient veterinary workforce, with adequate expertise, to meet needs in food hygiene and public health.

## Opportunities

- UK to be a global leader in food safety and animal welfare.
- Investing in the veterinary-led team in food hygiene and public health roles to develop and promote a unique, high health and welfare selling point for the UK.
- Developing and diversifying the role of the OV to make it a more attractive career option.

## Recommendations

### Short term

- R24. The UK Government should continue to meet current standards for food hygiene legislation and enforcement, including veterinary certification and controls.
- R25. The UK Government should maintain a single standard for meat produced for both domestic and export markets supported by an appropriate health mark.

### Medium term

- R26. The UK Government should undertake a major review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

- R27. The BVA Vet Futures workforce study and RCVS Graduate Outcomes project should investigate why UK veterinary undergraduates are not attracted to careers in food safety and meat hygiene, and explore measures to address the shortfall.

### Long term

- R28. The UK Government should review the regulatory environment to ensure it is properly based on risk whilst maintaining current animal health and welfare standards.

# Veterinary medicines

## Context

Medicines commercially available for the treatment of animals need to meet standards that ensure safety, quality and efficacy. In addition, medicines used in food-producing animals need to be regulated and used in such a way that residues of the active ingredients are not present in the food at a level harmful to human health. In the EU, this is ensured by the Veterinary Medicinal Products Directive 2001/82/EC (as amended). This sets out controls on the manufacture, authorisation, marketing, distribution and post-authorisation surveillance of veterinary medicines applicable in all EU Member States according to agreed technical requirements for quality, safety and efficacy thereby avoiding any barriers to trade in animal products derived from animals treated with such products. UK controls on veterinary medicines are set out nationally in the Veterinary Medicines Regulations (VMR), issued by the Veterinary Medicines Directorate (VMD).

Currently, there are three channels for the authorisation of veterinary medicines in the UK. Firstly, there is national authorisation by the VMD when an applicant has submitted an application to the UK only, and has no desire or intention to license and commercialise the product in any other Member State. The second is the centralised procedure,

under which an applicant submits a dossier to the European Medicines Agency (EMA) and a product is then licensed for use throughout the EU. Thirdly, the mutual recognition or decentralised procedure by which an applicant submits a dossier to one Member State which undertakes the authorisation. In this third procedure, once licensed, other Member States may approve the product by mutual recognition of the original marketing authorisation. In the case of veterinary medicines licensed for use in food animals by any of the above channels, there are requirements in place which lay down procedures for the establishment of residue limits of pharmacologically active substances in foodstuffs of animal origin.

Proposals for new EU Regulations on veterinary medicinal products and medicated feeds are currently under consideration and aim to: increase the availability of veterinary medicinal products; reduce administrative burden in the authorisation procedures; stimulate competitiveness and innovation; improve the functioning of the internal market; and address the public health risk of antimicrobial resistance. BVA has supported the development of the Regulations and it is hoped that the proposed rules would achieve their stated aims to benefit animals, including aquatic species, as well as their holders, pet owners, veterinary surgeons and businesses, including farmers and the animal health industry.

## Prescribing veterinary medicines under the Cascade

If there is no suitable veterinary medicine authorised in the UK to treat a condition in a particular species, vets can treat an animal under their care in accordance with risk-based decision tree known as the Cascade.

### The steps, in descending order of suitability, are:

- a veterinary medicine authorised in the UK for use in another animal species, or for a different condition in the same species
- a medicine authorised in the UK for human use, or
- a veterinary medicine not authorised in the UK, but authorised in another Member State for use in any animal species in accordance with the Special Import Scheme
- an extemporaneous preparation or special
- medicines imported from outside Europe via the Special Import Scheme

## Principles

With the above in mind, we have adopted the following principles:

- P15. Access to veterinary medicines licensed in the EU must be guaranteed and the UK should seek to maintain the link with the current EU approval systems
- P16. The veterinary medicines cascade must be maintained and the UK should seek opportunities to simplify it.
- P17. Any new UK regulatory framework for veterinary medicines must be soundly based on safety, quality and efficacy.



## What we heard

Continued access to veterinary medicines is essential for animal health and welfare in the UK. It is therefore important that any new regulatory measures allow the continued use of existing products authorised under EU systems without additional regulatory burdens and costs, and avoiding the necessity to reapply for marketing authorisations in the UK for EU-approved products used safely for many years. It is also important that the UK retains access to pharmacovigilance data on those medicines.

In order to protect public safety and thus be able to trade with the EU, future UK medicines legislation must establish an authorisation procedure on the same scientific and evidence-based technical requirements as currently adopted by the EU, firmly rooted in the standards set for quality, safety and efficacy.

Pharmaceutical companies are unlikely to be willing to fund separate applications to both the EMA and the UK. Any new regulatory model should seek to maintain a link between the licensing system to be introduced in the UK and the EU centralised and decentralised/mutual recognition systems, whereby the UK recognises EU authorisations aligned with the

Acquis Communautaire or, alternatively, establishes a European Free Trade Area (EFTA) type arrangement. This would also help to avoid unnecessary duplication of assessment.

The regulatory and legislative framework should also ensure that the UK is an attractive location for pharmaceutical research and development (R&D) with the focus on new product development. Measures to align the UK with EU systems should avoid the introduction of greater bureaucracy, which has the potential to result in increased defensive and costly research.

Availability of veterinary medicines for minor uses in major species and minor species (MUMS) remains a source of concern for the veterinary profession. Every effort must be made to show initiative in streamlining the regulatory process to increase availability of MUMS for both terrestrial and aquatic animals.

Maximum Residue Limits (MRLs) for substances in medicinal products destined for use in food animals are established by the EU according to Regulation No 470/2009. These MRLs underpin trade in animals and animal products and it is therefore important that, for new substances, UK MRL procedures are aligned with those of the EU.

BVA recognises antimicrobial resistance (AMR) as an issue of critical importance to society as a whole and we are committed to providing leadership on this issue. Our strong position on reducing antimicrobial resistance aligns with action being taken in the UK to tackle the problem through promoting best practice guidance and developing evidence-based targets for reducing use. These measures should align with EU requirements for antimicrobials and take account of proposals under consideration in the new EU Regulation for veterinary medicines in order to facilitate future trade.

**BVA's position on antimicrobial resistance states that our overall aspiration is to reduce the use of antibiotics in animals under our care alongside improving the health and welfare of those animals, particularly through disease prevention strategies. We do not support the habitual use of prophylactic antibiotics.**

The International Cooperation on Harmonisation of Technical Requirements for Registration of Veterinary Medicinal Products (VICH) is a trilateral programme (EU-Japan-USA) aimed at harmonising technical requirements for veterinary product registration. In order to remain as one of the leading agencies in Europe and beyond, and have an influential voice in global veterinary regulatory affairs, the UK should seek full membership of VICH.

Veterinary medicines are increasingly bought and sold online via internet pharmacies, which has prompted concerns about online prescription fraud. In the UK, the VMD has taken action to develop the accredited internet retailer scheme (AIRS) and the new EU proposal on veterinary medicinal products seeks to introduce rules to facilitate the internet retailing of veterinary medicines within the EU.

The UK is the only member of the EU that provides for a two-tier system for prescribing and distributing veterinary medicines – through veterinary surgeons and suitably qualified persons (SQPs). EU legislation currently recognises the UK's unique situation and it will be important for the VMD to establish whether this may present any barriers to future trade with the EU.

## Challenges

- A new bespoke regulatory system which introduces additional burdens for applicants could be a disincentive to product development for the UK market, which might discourage companies from licensing and commercialising products in this country and lead to a second-tier status.
- Outside the EU the UK may be unable to preserve the current efficiencies achieved by the existing EU system or harness the improvements within the EU proposal on veterinary medicinal products including new rules on the internet retail of veterinary medicines.
- Alignment with EU systems may potentially have a downside if the VMD are compelled to accept a European authorisation without any input into the assessment or decision process.



## Opportunities

- The use of AMR or antibiotic usage levels as a negotiating point in bilateral free trade agreements could be considered if the Codex Alimentarius<sup>5</sup> working group looking at the risk of AMR through the food chain finds that it is a realistic risk pathway.
- Developing a new and innovative regulatory system to attract companies to authorise and commercialise products in the UK in advance of the remainder of the EU.
- The UK could consider unilaterally introducing longer data protection periods for new and innovative products which would encourage more new product R&D in this country.
- Consideration could be given to greater restriction and control of obtaining veterinary medicines through the internet, especially antimicrobials, to reduce the potential for online prescription fraud.
- The UK might, in certain circumstances, carry out its own scientific risk assessment for authorisation of medicines thus giving access to a greater range of products on the market, although this would need to be funded.
- Modification of the cascade to allow greater flexibility regarding the use of medicinal products licensed elsewhere in the EU and those of other partners within VICH without stifling drug development.

## Recommendations

### Short term

- R29. The UK Government should guarantee the UK veterinary profession has ongoing access to all existing veterinary medicines licensed through the EU regulatory systems and existing import certificate mechanisms.
- R30. The UK Government should seek to maintain the link with the current EU veterinary medicine approval systems.
- R31. The Veterinary Medicines Directorate (VMD) should adopt existing Maximum Residue Limits (MRLs) for substances destined for use in food animals.
- R32. The UK Government should negotiate full membership at the International Cooperation on Harmonisation of Technical Requirements for Registration of Veterinary Medicinal Products (VICH).
- R33. The UK governments, in partnership with the veterinary profession and agricultural industry, should continue to play a leading role in tackling AMR by working with the EU, and internationally, to share best practice and promote responsible use.

### Medium term

- R34. The UK Government should develop a new and innovative regulatory system, rooted in safety, quality and efficacy, which aims to attract companies to authorise and commercialise products in the UK, preferably in advance of the remainder of the EU.
- R35. The VMD should review the cascade to consider whether it is possible to allow greater flexibility regarding the use of medicinal products licensed elsewhere in the EU, and those of other partners within VICH, without stifling drug development.
- R36. The UK Government should align Maximum Residue Limit procedures for new substances with those of the EU in order to facilitate trade.
- R37. The UK Government should review the regulatory framework for UK-based research and development on veterinary medicines to ensure the UK remains an attractive place for new product R&D.

<sup>5</sup> The Codex Alimentarius, or "Food Code" is a collection of standards, guidelines and codes of practice adopted by the Codex Alimentarius Commission. The Commission, also known as CAC, is the central part of the Joint FAO/WHO Food Standards Programme and was established by FAO and WHO to protect consumer health and promote fair practices in food.

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# Research and development

## Context

The UK has an unparalleled strategic asset in its science capability. With only 0.9% of the world's population, we currently have four of the top 10 universities and produce almost 16% of the total global output of peer-reviewed scientific papers. That research base has benefited greatly from the UK's membership of the EU. Whilst the UK contributed some £5.4 billion to the EU research budget in the period from 2007 to 2013, British researchers won back nearly £9 billion in collaborative research grants. The House of Commons Science and Technology Committee described UK science and research as "a national asset that can either be nurtured and strengthened by appropriate stewardship and vision, or be compromised by neglect during the UK's exit from the EU" (House of Commons Science and Technology Committee, 2016).

The UK has particular strengths in the biomedical sciences, including veterinary science. As referenced above in the **Veterinary workforce section (page 11)**, in 2012/13 research and development income for veterinary science totalled £55 million (Department for Business, Education and Skills, 2015). EU funding and collaboration has helped enable all the UK veterinary schools to grow their research portfolios and to attract the very best research brains in the EU to the UK. Currently, some 22% of the academic staff in UK veterinary schools are non-UK EU nationals.

The UK Government has undertaken to guarantee that any EU-funded multi-year research projects won by UK academic institutions while we remain a member of the EU will be underwritten for the total period of the research grant, even after the UK leaves the EU (HM Treasury, 2016), and we welcome this commitment.

## Principles

With the above in mind we have adopted the following principles:

**PI8.** There must be a regulatory and legislative framework to ensure the UK continues to be a globally attractive place for research and development (R&D) to include the

involvement of the veterinary profession in the UK in the conduct of clinical trials.

**PI9.** The UK should seek to maintain access to EU partnership R&D, or similar pan-European, funding and develop new opportunities with global partners.

## What we heard

The UK veterinary research base is essential in meeting the ongoing challenges of improving animal health and welfare, protecting food safety, combating antimicrobial resistance and controlling zoonotic diseases.

All of the UK veterinary schools have expressed real concerns about losing EU staff who report feeling uncertain about their future rights to live and work in the UK, or who may not be permitted to stay after Brexit. UK academic institutions must be able to attract staff from an international pool. Veterinary researchers who are EU nationals need to be free to move to the UK as required, and to feel secure in their jobs, and UK researchers need to continue to be able to benefit from developing their careers in EU institutions.

It is difficult to envisage how the UK could maintain access to any significant level of EU research funding unless EU institutions were free to compete for UK funding on a directly reciprocal basis. The current situation of the UK being a net beneficiary of the EU research budget will certainly disappear.

Mobility, collaboration, a diverse funding environment and a regulatory structure supporting cross-border research are necessary for effective research and development.

The Wellcome Trust is working with the wider life sciences community. They have identified that maintaining a diverse funding environment may be a challenge but they are looking for opportunities around regulatory reform and the potential to move away from the EU's precautionary culture.

There may be opportunities for the UK, free from the regulatory burdens associated with the EU, to devise a distinctive and attractive environment for research and innovation, with the overall aim of minimising complexity and

cost. The removal of the EU's state aid<sup>6</sup> regulations should enable the UK Government to invest more in private sector initiatives.

It will be important to maintain and grow the UK's reputation as a key country in which multinational pharmaceutical companies can conduct research to the highest global standards. The regulatory framework that applies to life science research should not hinder the development and global application of novel therapeutics.

## Challenges

- Ensuring budgetary resources are suitable to maintain the UK's current pre-eminence in world science, including veterinary science.
- Retaining and attracting the best research brains to work in the UK in the veterinary research sector.
- Maintaining collaborative research links to EU-funded research groups.

## Opportunities

- Benefiting from a skills-based immigration policy that is commensurate with attracting the very best brains to the UK, including from within the EU.
- Focusing research on the disease problems that are a particular threat to UK livestock health and welfare.
- Linking trade deals with collaborative research initiatives aimed at benefiting the UK and its trading partners beyond the EU.
- Increasing government investment in private sector initiatives once EU state aid regulations cease to apply.

## Recommendations

### Short term

- R38. The UK Government should fulfil its commitment to guarantee to underwrite any EU-funded multi-year research projects for the total period of the research grant, even after the UK leaves the EU.
- R39. The UK Government should develop a skills-based immigration policy that is commensurate with attracting the very best talent to the UK.
- R40. The UK Government should pursue a collaborative approach to the funding of biomedical research across Europe, as part of a wider global strategy for research.

### Medium term

- R41. The UK Government should link trade deals with collaborative research initiatives aimed at benefiting the UK and its trading partners beyond the EU.
- R42. The UK Government should develop a regulatory and legislative framework to ensure the UK continues to be a globally attractive place for veterinary research and development.

### Long term

- R43. The UK Government should increase its investment in private sector initiatives once EU state aid regulations cease to apply.

<sup>6</sup> State aid is defined as an advantage in any form whatsoever conferred on a selective basis to undertakings by national public authorities. EU rules generally prohibit state aid unless it is justified by reasons of general economic development.

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# Trade

Trade in animals and animal products to and from the UK is facilitated in the case of the EU by the Single Market and, in the case of third countries, for the most part by bilateral trade agreements. Of course, trade in animals and animal products is underpinned by legislation which, in turn, is supported by the professional standards of the veterinary profession. In essence, the veterinary profession facilitates much of this trade by supervising the production of certain products (eg fresh meat) and certifying other products and animals. It follows that the veterinary profession will play an important role in changes arising from Brexit.

The EU treaties introduced the single standard of production across the EU. This means that trade in goods between Member States (and imports from third countries) are required to meet a single standard providing assurances for consumers, via the health mark for animal products, and simplified trade across borders. In addition, the EU Customs Union provides for tariff-free trade across the EU. Brexit may change that, but the extent of the changes will depend on the nature of the UK's exit and the international trade deals agreed.

For third countries, either the UK has reached bilateral agreements for certification or the EU has reached bilateral agreements which apply to trade between all Member States and the relevant third country (eg Canada and Switzerland). These agreements cover certification where required and set the tariffs for the commodities covered by the scope of the agreement. Again, Brexit may change this since the EU agreements with third countries will not be applicable to the UK once the UK leaves the EU.

Some trade agreements pre-date the formation of the EU and will remain important post-Brexit. For example, the Tripartite Agreement (TPA) in place for the movement of horses between the UK, France and the Republic of Ireland which allows for a relaxation of the procedures required under Council Directive 2009/156/EC. BVA supports the retention of the TPA to allow the continuation of the free movement of horses between the UK, Ireland and France due to the significant economic impact on the racing and breeding industries.

The UK's post-Brexit CITES status (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) requires permits for both export and import of CITES species. There are significant implications for the movement of zoo animals, research material and diagnostic specimens from these species (all are covered by CITES down to a swab from a CITES species). Currently samples can move freely within the EU enabling use of laboratories across the EU in a timely fashion. CITES permits are also essential for trade/research movement of all Appendix-listed animal species. The UK's withdrawal from a common EU CITES area may have implications for audit and regulation of trade in 'dubious' animal products, and we do not want the UK to become a soft option for the global trade in these products.

The implications of Brexit for veterinary workforce, animal health and welfare, public health and veterinary medicines are based around the risks and opportunities linked to each of these issues. In each of these areas, UK Government policy has been profoundly affected by membership of the EU. However, strongly linked to each of these issues is trade in animals and animal products since it is the veterinary profession that provides the professional assurances that underpin these transactions.

Brexit offers the opportunity for change and we have discussed these opportunities in the chapters above. For example, there are advocates for tighter controls at the UK border as, it is argued, this will reduce the risk of incursion of animal disease carried on animals and animal products. On the other hand, international trade agreements based, for example, on OIE



standards rather than EU standards, might better facilitate trade with third countries. At the same time, there may be an appetite for fundamental change to food hygiene law where the UK's regulations begin to diverge from that of the EU. The implications of fundamental change are two-fold:

- a. Re-introducing tighter controls at the border has implications. Imports of both animals and animal products may carry pathogens that represent a threat to UK animal populations. The EU sought to minimise the risk by ensuring appropriate standards of production and certification at the point of production thereby obviating the need for most border checks. The following will need to be taken into account:
  - Enhanced border checks may give the impression of greater control over the risk but equally they may hinder travel and transport with increased costs for little gain.
  - Risk of incursion will not be eliminated since most pathogens, particularly in animal products, cannot be practically detected during border checks. The application of appropriate standards, with checks at the point of production, is more effective.
  - Since 2001, with the exception of one incident of Equine Infectious Anaemia, serious exotic disease incidents in the UK have been attributed primarily to wild birds (Avian Influenza) or insects (Bluetongue, Schmallenberg disease). Increasing border controls will not change these risks.
- b. Increasing controls on imports and/or diverging substantially from EU production standards will have consequences. Trade deals or trading blocs are generally built on the application of an agreed single or equivalent standard for each traded commodity in order to ease and standardise trade between the two parties. That will not change once the UK leaves the EU. The following will need to be taken into account:
  - Once the UK leaves the EU, the EU is likely to treat the UK as third country. Taking export of fresh meat as an example, either the UK will have to continue to meet the EU standards or run two standards in parallel - one to meet the EU standard and one for the domestic market. The latter could result in complications, confusion and significant risks, including food fraud.
  - If the UK imposes strict controls on imports, it is likely that the EU (or any other state we treat similarly) will impose reciprocal controls.

These principles are intended to underpin the application of good veterinary practice in animal health, welfare and public health. For the most part, provided these are observed and that the opportunities that Brexit represents are exploited, then the essential role the veterinary profession currently fulfils to enable trade in animals and animal products can be maintained and enhanced.

## Recommendations

- R44. Whatever agreement the UK reaches with the EU, and subsequently with third countries, the role of the veterinary surgeon in facilitating international trade via professional certification must be recognised and supported by the UK Government.
- R45. The UK Government should ensure that a trade deal or deals, in respect of animals and animal products, take account of already agreed protocols such as those applied by the EU or the OIE and are backed by appropriate veterinary certification.
- R46. The UK Government should impose import conditions for animals and animal products that are risk-based and supported by clear veterinary certified disease status.
- R47. The UK Government should ensure that veterinary intervention to ensure the appropriate standards are applied takes place at the point of production as checks at the border are insufficiently sensitive to detect risk.
- R48. The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets in order to avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards.
- R49. The UK Government should retain the Tripartite Agreement (TPA) to allow the free movement of horses between the UK, France and the Republic of Ireland.

# Devolution

Legislation and regulation governing the work of the veterinary profession in the UK is a mixed picture. While much of the direction comes from the EU, implementation happens at both UK and devolved levels. Regulation of the profession and legislation relating to veterinary medicines, for example, are UK-wide, while animal health and welfare are devolved matters. BVA's own structure recognises the devolved nature of the UK with Branches in Scotland, Wales and Northern Ireland, and we support the concept of local solutions that suit local circumstances. However, directives and regulations from the EU have thus far provided for common approaches across the UK to many of the issues of interest to the veterinary profession.

Due to the differing nature of, for example, the make-up of the veterinary workforce, the provision of veterinary education, and the agricultural industry in the four parts of the UK (see Table 1) we recognise that Brexit will impact in different ways, and over the coming months and years we will be working closely with our members and partner organisations in each part of the UK to respond to these impacts.

Trade and animal movements across the borders of the UK are likely to remain hugely important for the whole

UK economy; diseases do not necessarily respect political borders meaning that shared surveillance will continue to be a priority; and it is imperative that animal welfare regulations do not simply export poor welfare to neighbouring countries. For all of these reasons, in a post-Brexit UK we believe that structures should be put in place to ensure ongoing cooperation and collaboration. Our overarching call is therefore for the four parts of the UK to continue to work together for the good of animal health and welfare, and public health.

**Table 1: Differences in agricultural contribution to GVA, livestock numbers, number of vets and number of vet schools by administration.**

	Agriculture GVA** (% of total) <sup>1</sup>	Livestock (number per ha. agricultural holdings) <sup>1</sup>			Number of vets <sup>2</sup>	Vet schools
		Sheep	Pigs	Cattle		
England	0.6	1.68	0.6	0.43	15415	5*
N. Ireland	1.4	1.99	1.61	0.57	773	0
Scotland	1	1.2	0.32	0.06	1924	2
Wales	0.7	5.71	0.67	0.02	1012	0

\*University of Surrey veterinary degree approval due in 2019. \*\*Gross Value Added. 1. House of Commons Library (2016) *Agriculture in the home countries: Social Indicators page* [Online] Available at: <http://researchbriefings.files.parliament.uk/documents/CBP-7754/CBP-7754.pdf> [Accessed 6 April 2017]. 2. RCVS, 2014. RCVS Facts. [Online] Available at: [www.vetfutures.org.uk/download/factsheets/rcvsfacts2014.pdf](http://www.vetfutures.org.uk/download/factsheets/rcvsfacts2014.pdf) [Accessed 16 March 2017].



## Recommendations

Note: Recommendation **RI6 in the Animal health section (page 5)** calls on the UK governments to establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK.

R50. The principles of collaboration and cooperation outlined in this report should be adopted should Scotland vote to become independent in order to facilitate cross-border trade and provision of veterinary services.

# Northern Ireland

When the UK leaves the EU, Northern Ireland (NI) will be the only part of the UK which shares a land border with the EU. Currently, across the border there are strong government, business and social relationships. Many of these existed before the UK and Ireland entered the European Economic Community (EEC, now EU) and others have developed since then. Any impediment to the free movement of people, goods (including animals) and services across the border will seriously impact on these long-standing arrangements.

Around 85 NI veterinary practices provide services to the livestock industry. The NI agri-food sector, including producers, processors, and veterinary practices relies on trade across the border with 350,000 sheep, 500,000 pigs and 600 million litres of milk traded annually for processing (Department of Agriculture, Environment and Rural Affairs, 2016). Consequently, any impediment to trade will adversely affect the livestock, agri-food and veterinary sectors. Veterinary practices in NI often provide services to clients and governments on both sides of the border and these too could be directly impacted by border restrictions.

The NI veterinary workforce is heavily dependent on EU vets, potentially even more so than the rest of the UK due to the large numbers of vets who qualify from the Republic of Ireland. The free movement of people across the border means that EU vets work in all sectors in NI, including many in the Department for Agriculture, Environment and Rural Affairs (DAERA).

Currently, there is an all-island approach taken to the control of animal disease and disease surveillance through government and non-government initiatives. These have the potential for further development to continue improving the status of animal health and welfare.

The UK should provide an environment for the development of an animal health and welfare strategy, with high calibre veterinary support, to enhance the NI livestock sector. High productivity of quality product will improve trade and the local NI economy.

## Northern Ireland stakeholder event

In November 2016, BVA held a Brexit meeting at DAERA to engage directly with Northern Ireland stakeholders. Attendees included:

- BVA Northern Ireland Branch
- Agri-Food and Biosciences Institute
- DAERA
- Ulster Farmers' Union
- Northern Ireland Meat Exporters Association
- Queens University Belfast
- Veterinary NI
- Dairy UK
- Moy Park
- Dunbia
- Parklands

## Recommendations

- R51. The UK Government, Northern Ireland Executive and Irish Government should consult on how best to ensure that the provision of professional services and trade across the Irish border is not disrupted.
- R52. DAERA and the Department of Agriculture, Food and the Marine should ensure cooperation across the border to continually improve animal health and welfare with an all-island approach.

# Brexit: the British Veterinary Association's principles for negotiating the UK's exit from the European Union

There are a number of areas of interest to the veterinary profession that may be affected by Brexit. These include veterinary workforce issues, animal health (including surveillance and border controls), animal welfare, food hygiene and safety, veterinary medicines and research and development (R&D).

Our overarching approach to Brexit is that existing animal health, animal welfare, public health, veterinary medicines, workforce, and environmental protection standards must at least be maintained at the same level, or a level equivalent to current EU standards, while seizing the opportunity to improve standards in accordance with evidence-based risk analysis of animal health, welfare and ethics.

Any public money to replace the EU Common Agricultural Policy (CAP) should be used to support and incentivise public goods. These should encompass at least animal health and welfare, disease surveillance, biodiversity and environmental stewardship.

In relation to the specific areas of interest the BVA has developed underlying principles for negotiation:

## Workforce

1. Working rights for non-British EU vets and veterinary nurses currently working and studying in the UK, and for British vets and VNs working in the EU, must be guaranteed at the existing level with no time limit.
2. New systems for immigration must take account of workforce needs and the demand for veterinary surgeons and nurses in the wide range of roles they fulfil, including

taking into account flexible working and career breaks, and consideration of the inclusion of veterinary medicine on the Shortage Occupation List.

3. RCVS should have the power to determine the recognition of veterinary qualifications and language competency requirements.

## Animal health

4. There must be no dilution of existing animal health protections and these should be reinforced wherever reasonable and proportionate.
5. Resources for existing disease control and eradication programmes and surveillance systems should at least be maintained, and the UK should seek opportunities to improve industry/government collaboration on jointly funded programmes.
6. Reciprocal surveillance data sharing with Europe and internationally must be maintained, and the UK must maintain effective and adequately resourced systems for detecting new and emerging diseases.
7. Existing standards (including welfare) in relation to imported live animals and animal products must be maintained.

8. Where animal health legislation is reviewed, the UK should seek opportunities to ensure the regulatory environment is properly based on risk and not overly prescriptive, in order to reduce unnecessary administrative burden.

## Animal welfare

9. There must be no dilution of existing animal welfare standards and legislation and the UK should seek opportunities to improve animal welfare, for example in relation to the export/import of live animals, mandatory method of production labelling, and the labelling of non-stun slaughter.
10. The USP of "UK PLC" should be high animal welfare and food safety standards.
11. The maintenance of animal welfare standards should be integral to the negotiation of new trade agreements.

## Food hygiene and safety

12. Food hygiene legislation and enforcement, including that for meat hygiene, must be maintained at the current standard or an internationally-recognised equivalent.
13. Veterinary involvement from farm to fork underpins animal health, welfare, public health and food safety. Therefore, veterinary certification and controls to facilitate international trade must be maintained to ensure high standards.
14. Where food safety (including meat hygiene) legislation is reviewed the UK should seek opportunities to ensure the regulatory environment is properly based on risk whilst maintaining current health and welfare standards.

## Veterinary medicines

15. Access to veterinary medicines licensed in the EU must be guaranteed and the UK should seek to maintain the link with the current EU approval systems.\*
16. The veterinary medicines cascade must be maintained and the UK should seek opportunities to simplify it.
17. Any new UK regulatory framework for veterinary medicines must be soundly based on safety, quality and efficacy.

## Research and development (R&D)

18. There must be a regulatory and legislative framework to ensure the UK continues to be a globally attractive place for research and development (R&D) to include the involvement of the veterinary profession in the UK in the conduct of clinical trials.
19. The UK should seek to maintain access to EU partnership R&D, or similar pan-European, funding and develop new opportunities with global partners.

These principles were agreed by BVA Council in September 2016.

\*The wording of principle 15 was slightly amended by BVA Council in April 2017



# List of contributors and consultees

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- Association of Government Vets (AGV)
- Association of Veterinarians in Industry (AVI)
- Association of Veterinary Students (AVS)
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- British Equine Veterinary Association (BEVA)
- British Small Animal Veterinary Association (BSAVA)
- British Veterinary Hospitals Association (BVHA)
- British Veterinary Poultry Association (BVPA)
- British Veterinary Zoological Society (BVZS)
- Fish Veterinary Society (FVS)
- Goat Veterinary Society (GVS)
- Lab Animal Veterinary Association (LAVA)
- Pig Veterinary Society (PVS)
- Royal Army Veterinary Corps (RAVC)
- Sheep Veterinary Society (SVS)
- Society of Greyhound Veterinarians (SGV)
- Society of Practising Veterinary Surgeons (SPVS)
- Veterinary Deer Society (VDS)
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- The Royal College of Veterinary Surgeons (RCVS)
- The Royal Society for the Prevention of Cruelty to Animals (RSPCA)
- The Veterinary Medicines Directorate (VMD)
- The Veterinary Policy Research Foundation (VPRF)
- Vet Schools Council (VSC)
- The Wellcome Trust



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