

BVA response to EFRA Committee inquiry: Seafood and Meat Exports to the EU

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health, animal welfare, public health, regulatory issues and employment matters.
- 2) We welcome the opportunity to provide our evidence to this inquiry on seafood and meat exports to the EU.
- 3) Movements of both animals and animal products may carry pathogens that can represent a threat to public health and the health of animal populations. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants. SPS measures form a vital part of the biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. In the broadest sense, biosecurity 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.
- 4) The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. Veterinary certification and controls form a vital part of the biosecurity framework for the UK and our trading partners.
- 5) To facilitate trade, the UK needs enough veterinary surgeons to meet the additional demands for export and import certification and controls that are now required following the end of the transition period. If that requirement is not fulfilled, it will present a significant barrier to trade that could be detrimental to the UK farming, food and hospitality sectors.

The Trade and Cooperation Agreement

- 6) The Withdrawal Agreement concluded between the EU and UK on 17 October 2019 formalised the position that Great Britain would be leaving the EU Single Market, as well as the unique position of Northern Ireland within the Single Market for agri-food products and live animals. Leaving the Single Market means exporters require an Export Health Certificate (EHC) to transport animals and Products of Animal Origin (POAO) from Great Britain to the EU Single Market and Northern Ireland. There is also a requirement for additional certification of pet travel and equine movements.
- 7) In most cases the purpose of a free trade agreement is to reduce trade friction. However, the deal reached between the UK and EU sought to manage additional trade friction. There was hope that the Trade and Cooperation Agreement (TCA) would in some way reduce the burden of the additional trade friction, reduce bureaucracy and limit the level of controls that would be required. However, the TCA Sanitary and Phytosanitary SPS chapter provides very little in this regard.
- 8) Within the structures created by the TCA, there will be a "Trade Specialised Committee on Sanitary and Phytosanitary Measures" where the UK and EU can meet and discuss the operation of SPS arrangements and potentially seek further facilitations without compromising biosecurity. It is imperative that the UK government engages with industry and the veterinary profession to understand their practical experience of meeting the demands of exporting SPS goods and to work together to identify potential solutions to bring to the specialised committee.
- 9) We welcome the provisions for cooperation on antimicrobial resistance (AMR), animal welfare, and sustainable farming. However, it should be noted that the TCA says, "The Parties recognise

that animals are sentient beings.” At present, this is no longer the case in the UK and should be rectified with legislation as a matter of urgency, as BVA has urged government for some time.

Which seafood and meat exports have been particularly affected by border delays and disruptions since 1 January, and why?

- 10) From 1 January 2021, there has been an increased demand for veterinary certification and supervision of goods moving from Great Britain to both the EU Single Market and Northern Ireland. This includes POAO, germplasm and live animals, including pet animals and equines.
- 11) Exporters require an EHC signed by an OV to transport live animals, POAO or germplasm from Great Britain to the EU Single Market and Northern Ireland (unless exempt during the current grace period). The OV stamp and signature attests that relevant public health, animal health and animal welfare requirements have been met. The EHC for fishery products¹ can be signed by a designated Food Competent Certifying Officer (FCCO) or an OV. The certificate must then travel alongside the consignment where they will enter the Single Market via a designated border control post (BCP) for documentary, identity, and physical checks by veterinary surgeons.
- 12) Additional veterinary capacity will be needed to fulfil this demand. It is still too early to tell if the UK has sufficient veterinary capacity to do this. Many operators are still waiting and delaying some of their exports. Thus far, veterinary capacity has not yet been a barrier and we welcome the work that has been done by government to increase that capacity.
- 13) Our understanding from discussions with the UK government, EU contacts and industry is that during January exports have been well below the level that would typically be expected. Engagement with French authorities has provided that in the first few days of January, traffic in the GB-France direction was only 30% of its usual amount, and it is at approximately 60% as of 14 January 2021. However a large percentage of the lorries were arriving in France empty. The proportion of batches that require SPS checks is around 5%, compared to 10% in usual times.
- 14) Further demands for additional veterinary capacity in Great Britain to sign EHCs are expected. The current grace period for movements from Great Britain to Northern Ireland, that removes the requirements for the majority of EHCs, will come to an end on 1 April 2021. It is also known that new EU EHCs will need to be operational by 21 April 2021. These new EHCs will also increase the demand for EHCs as they will remove an exemption currently in place for certain composite goods.
- 15) The Chilled Food Association, British Frozen Food Federation and British Poultry Council have compiled data from their memberships to identify the potential additional burdens from the extension of the scope of composite EHCs within their sectors. This is based on current trade flows so may not be representative of normal levels of trade. They estimate that without this change 29,732 EHCs would be required per annum for their memberships. They believe they would see the number of EHCs rise by approximately 8,533 per year: an approximate increase of 29%. The value of the consignments that would be covered by these 8,533 EHCs is approximately £21.91m.

What steps should the UK Government take to mitigate these issues? What should its short and long-term priorities for action be?

Ensuring appropriate veterinary capacity

- 16) At this stage, almost two months after the end of the transition period, there are material uncertainties and limitations on knowing what the exact increase in control and certification requirements is likely to be. When preparing for a no-deal exit in 2019, Defra’s “mid estimate” assumption was a fivefold increase in the number of EHCs.

¹ fresh fish, processed fish and crustaceans, such as lobster and crab, including living animals if intended for direct human consumption

- 17) Translating EHCs into veterinary workforce demand is complex. Defra estimated an additional 200 Full-Time Equivalent (FTE) OV's will be required to certify export of POAO from Great Britain.² Businesses involved in export certification work put the number higher, requiring at least 350 FTE additional vets. Translating an FTE figure into the actual number of OV's needed is more complex because many qualified vets operating in the private certification market certify health certificates alongside other veterinary activities. There is a range of OV qualifications tailored to specific types of export (e.g. avian for poultry exports), so it is an over-simplification to focus on total numbers of OV's without a clear understanding of which panels will be most needed. Geography is also an important factor; OV's with the right panels will be needed at the correct localities to meet the need of local industry and transport logistics.
- 18) The Animal and Plant Health Agency (APHA) has increased the number of veterinary surgeons with POAO certification panels from approximately 600 in February 2019 to more than 1200 at the end of the transition period. There has also been the introduction of a Certification Support Officer (CSO) role. These allied professionals work within a vet-led team, under the direction of an OV, providing support by collecting the evidence required for the OV to complete an EHC. BVA supports the concept of the vet-led team utilising a 'hub and spoke' model with the vet at the centre working with appropriately trained and regulated allied professionals to coordinate services for clients and patients.³ The CSO does not remove the requirement for an OV to sign the EHC. There are now 400 CSOs trained in Great Britain.⁴ There are opportunities to expand the number of CSOs and make use of their skills to help to optimise limited veterinary resource.
- 19) Government has put in place surge capacity to meet demand in the short term. Provision has been put in place for APHA vets to be taken off front line work and utilised to fill gaps in provision when this is needed. APHA has also trained a number of new export locums to meet demand without moving frontline staff off other work. This dedicated locum capacity is particularly welcome. APHA veterinary capacity is an important resource that is needed to meet animal disease incursions in the UK, which could limit that ability for that resource to be released. This necessity was underlined on 11 November 2020, when an Avian Influenza Prevention Zone (AIPZ) was declared across England, Scotland, and Wales to mitigate the risk of the disease spreading.

Immigration

- 20) The UK is highly reliant on EU vets. According to the Royal College of Veterinary Surgeons (RCVS), on 19 January 2021, there were 27,324 UK practising vets. Of these, 7,936 graduated in the EU (29% of the total). In recent years, more veterinary surgeons who registered in the UK qualified in the EU than in the UK. However, between 2019 and 2020, EU registrations dropped by 35%. This has largely been because of Covid 19 and restrictions on travel. Last ten years of annual registration data below:

Registration Year	UK	EU	Rest of World	Total
2011	818	472	174	1464
2012	807	573	150	1530
2013	792	664	145	1601
2014	815	713	143	1671

² Question for Department for Environment, Food and Rural Affairs UIN 96843, tabled on 29 September 2020 <https://questions-statements.parliament.uk/written-questions/detail/2020-09-29/96843>

³ <https://www.bva.co.uk/media/3110/20191015-bva-vet-team-poster-v6.pdf>

⁴ James Quinault Defra evidence to Public Accounts Committee <https://committees.parliament.uk/oralevidence/1585/default/>

2015	909	981	203	2093
2016	911	973	178	2062
2017	867	963	200	2030
2018	885	1197	218	2300
2019	987	1137	225	2349
2020	1075	741	132	1948

- 21) The FSA estimates 95% of the veterinary workforce in abattoirs graduated overseas – with the clear majority of these coming from the EU. Losing these veterinary surgeons from slaughterhouses would increase the risk of food fraud, provide the potential for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could jeopardise trade.
- 22) Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EU-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.
- 23) In February 2020, the government set out its plans for a new immigration system. Free movement has now ended, as has the automatic registration of EEA qualified vets by the Royal College of Veterinary Surgeons as part of the Mutual Recognition of Professional Qualifications (MRPQ). In place of free movement is an employer-led points-based system which is likely to place a significant administrative and financial burden on veterinary businesses who will be required to sponsor recruits from outside of the UK. This new immigration system casts significant doubt over whether the profession will be able to fill the workforce gap created by the end of free movement when we are already struggling to recruit and retain vets.

Ensuring EHCs are accepted consistently.

- 24) An EHC that has been signed by an OV to transport live animals, POAO or germplasm from Great Britain to the EU Single Market will enter the Single Market via a designated border control post (BCP) for documentary, identity and physical checks by veterinary surgeons. Efforts have been undertaken by government and certifying vets to ensure UK EHCs are accepted consistently across EU BCPs and the movement of goods continues.
- 25) Senior Defra and APHA staff have attended daily meetings with OVs to determine capacity issues and identify any concerns regarding EHCs. These concerns are then raised by government with individual BCPs and the EU Commission to ensure consistency. As appropriate, the guidance to Great Britain OVs and Member State BCPs is updated to ensure the advice to exporters is correct. This process has improved, however, there remain significant problems with the completion of EHCs, both in interpreting the requirements and with inconsistencies in interpretation and implementation at BCPs.
- 26) Longer term the government could seek to work with the EU to simplify the documentation requirements and processes. This should be an ambition of the Trade Specialised Committee on Sanitary and Phytosanitary Measures. The membership and scope of this specialised committee is not yet known. However, it is essential that across all sectors industry and the veterinary profession are engaged to identify potential solutions to bring to the specialised committee.

How useful and responsive were the guidance and support provided by the Government to business, before and since 1 January?

- 27) It is vital that correct and up-to-date guidance is provided to OVs to complete EHCs. As noted above, the number of OVs undertaking EHC work in Great Britain has expanded dramatically. As a result, many of the OVs completing EHCs since the end of the transition period will have

been doing so for the first time. Furthermore, the established cohort of OV's who had the required export qualifications previously will have no prior experience of signing these specific EU EHCs.

- 28) Guidance is needed to allow the OV to perform their role effectively and efficiently to facilitate the movement of products. Clear and accurate guidance reduces also provides the OV assurance they are meeting their professional duties to the RCVS. Good guidance, which provides certainty to OV's, will make this area of work more inviting for vets and aid retention.
- 29) It is only as trade with the EU under the new requirements has progressed and EHCs are being completed by OV's in Great Britain and checked by OV's in EU BCPs that many of the consistencies of interpretation are being identified. As noted above, Defra has been liaising with the EU Commission to clarify any interpretation issues with EHCs and based on this, APHA has been regularly updating guidance to OV's. However, it will be challenging for OV's to stay up to date given the frequency with which guidance is updated.
- 30) These updates are the utility of these clarifications may be short lived. The Animal Health Law, which was adopted by the EU in 2016, will be implemented from 21 April 2021. As a result, a new set of EU EHCs will be required to be used. The model certificates have been published in the Official Journal of the EU.⁵ These new certificates will need to be made available on the Export Health Certificates Online (EHCO) system and accompanying Notes for Guidance provided to OV's. As the new certificates are used, new interpretation issues will emerge. This will add new delays to exports until further clarifications can be agreed between the UK and EU and updated guidance provided.
- 31) To date, little official guidance from government has been provided to OV's on this significant change. Similarly, little advice has been shared with industry on how to make preparations now to ensure certifying OV's will have the required information in the correct format to complete and sign these new EHCs.

How ready is the UK to introduce checks on food imports from the EU during 2021, and are there lessons to be learnt from the issues that UK exporters have faced?

- 32) There will also be the need for OV's to perform import checks once sanitary controls are applied on imports into Great Britain from the EU. These requirements will be phased in. From April 2021 all POAO will also require pre-notification and the relevant health documentation. From July 2021 there will be an increase in physical checks and the taking of samples at Great Britain Border Control Posts.
- 33) Where the Great Britain BCPs will be located is still uncertain. In the Border Operating Model, which was updated in October 2020, the government notes "Much of this infrastructure will be located at ports and border locations but where this is demonstrated not to be possible, HMG will provide inland facilities."⁶ There is then a list of "intended and potential inland sites." At this stage more certainty is needed. Putting in place this infrastructure and staff will require a significant amount of time and resource. BCPs will need to be approved for the specific type of commodity that will move through them. For example, for a BCP to be designated for live animal imports it will require specific infrastructure.
- 34) On Friday 2 October 2020 the government launched a £200 million fund for ports to bid on to build new facilities.⁷ Reporting from the Financial Times has noted concerns from port operators that this funding may be inadequate in practice.⁸
- 35) Great Britain can learn from the experience of neighbouring states who are preparing border

⁵ https://eur-lex.europa.eu/eli/reg_impl/2020/2235/oj

⁶ <https://www.gov.uk/government/publications/the-border-operating-model>

⁷ <https://www.gov.uk/government/news/200-million-port-infrastructure-fund-opens-for-bids>

⁸ <https://www.ft.com/content/82dab12c-380a-450b-b7f7-c47a56102c66>

Sanitary and Phytosanitary infrastructure and staff to comply with imports from Great Britain. Ireland will be required to have BCPs in place from January. The Irish Government agreed sites and plans in 2018 and were preparing to hire “in the region of 200 extra full-time staff to carry out Sanitary and Phytosanitary Controls (SPS) checks and controls at ports and airports.”⁹ A sizeable number of this cadre will be OVs, but there will be phytosanitary staff and support staff included in this number. In the Netherlands, there were plans, reported in 2018, for an additional 145 veterinarians for the Port of Rotterdam ahead of a previous potential no deal.¹⁰

- 36)** Recently, the government announced £14 million in funding has been given to local authorities across England to help them maintain the UK’s high standards on imported animal products. “Over 500 new port health roles are being created to facilitate the new checks on imports of animal products from the EU from April 2021.”¹¹ Not all of these reported 500 personnel will need to be qualified official veterinarians (OVs), but it is likely that a significant number will be OVs.
- 37)** In Great Britain there are very limited numbers of OVs that have the required training to function as OVs at BCPs. It is likely that Port Authorities will be seeking to source private OVs from existing certification businesses, further reducing the availability of experienced export OVs in the supply chain.
- 38)** As Great Britain has now left the EU Single Market, it now holds the competence to design its own official controls regime. It is essential that the veterinary profession is engaged in this process to ensure animal health, animal welfare and public health are upheld whilst using our workforce efficiently and effectively by amongst other things exploiting the opportunities presented by new technology.

⁹ <https://www.thejournal.ie/ireland-customs-veterinary-brexit-4135182-Jul2018/>

¹⁰ <https://www.theguardian.com/business/2018/sep/22/rotterdam-prepared-for-worst-after-brex>

¹¹ <https://www.gov.uk/government/publications/port-health-transition-fund>