

Written Evidence submitted by The British Veterinary Association (BVA)(CF0006)

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 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 and welfare, public health, regulatory issues and employment matters.
- 2) We welcome the opportunity to respond to this EFRA Committee inquiry on DEFRA Common frameworks.

The need for common frameworks

- 3) As areas of EU competence have returned to the UK, the way in which this interacts with devolution needs careful consideration. According to analysis conducted by the UK government, there are a total of 142 distinct policy areas where EU law intersects with devolved powers in at least one of the three devolved nations.¹
- 4) This is particularly pertinent across issues of veterinary interest, including animal health, animal welfare, agriculture, and food safety. Until now, cohesion has been achieved through EU Directives which have allowed limited scope for the four nations of the UK to diverge.
- 5) It is essential that there are efficient and effective mechanisms in place to ensure ongoing cooperation and collaboration across the UK in relation to the production of products of animal origin, the delivery of veterinary services, disease control, and animal welfare standards. This was recognised in our report 'Brexit and the veterinary profession' published in 2016:
*"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."*²
- 6) Such mechanisms must ensure a degree of parity so as to avoid giving a competitive advantage to producers in one region over those in another yet allow sufficient flexibility to progress animal health and welfare, and food safety, and avoid stifling or slowing progress by a requirement to avoid divergence.
- 7) Maintaining cohesion in the UK internal market is important from a veterinary perspective for a range of reasons. Practically, it is more straightforward for a vet working on either side of the Wales/England or Scotland/England border to have one set of regulations to comply with.
- 8) There are already examples of divergence, such as approaches to disease control where the devolved administrations apply control programmes tailored to local circumstances. For example, the existing differences in monitoring and controlling Bovine Tuberculosis across the UK reflect the relative risk of the disease in the different areas, but there are mechanisms to allow movement of cattle across the borders. Where variations occur, there should be mechanisms in place to generate evidence of the effectiveness of the various policies and

¹ Institute for Government, Brexit, devolution and common frameworks,

<https://www.instituteforgovernment.org.uk/explainers/brexit-devolution-and-common-frameworks>

² <https://www.bva.co.uk/resources-support/practice-management/brexit-and-the-veterinary-profession/#>

support policy making across the UK

- 9) Furthermore, we would not wish to see the creation of a need for additional veterinary checks on products of animal origin moving within the UK. At a time when the veterinary workforce is already stretched, this could have a negative impact on the ability of the veterinary profession to deliver essential services.
- 10) We welcome the commitment to close working across participating administrations to design policy that benefits all parts of the UK, avoids disruptive divergence, and facilitates innovation in discussion with other administrations, ensuring that new regulations are interoperable.

United Kingdom Internal Market Act 2020

- 11) Examination of the mechanisms that will ensure cohesion across the UK post-Brexit should consider the United Kingdom Internal Market Act 2020 alongside common frameworks. We supported the principle of mutual recognition contained within the Act. This means that the rules governing the production and sale of goods and services in one part of the UK are recognised as being as good as the rules in any other part of the UK. Such recognition will also be necessary to support frictionless trade with third countries, in relation to the health provenance of animals born in one region of the UK and reared and slaughtered in another, but also more broadly in relation to 'Brand Britain'. We also supported the principle of non-discrimination which will prevent one regulatory system introducing rules which could discriminate against goods or services from another.
- 12) In our response to the Department for Business, Energy, and Industrial Strategy White Paper on the UK Internal Market, we raised our concerns that the mechanisms contained within the Act could have the unintended consequences of blocking progress on health and welfare standards and outcomes.³ For example, those regions wishing to make animal health and welfare improvements through mandating changes to particular production systems must not be disincentivised to do so by the requirement not to discriminate against lower welfare and potentially cheaper products from elsewhere in the UK. We noted that effective common frameworks would be vital to ensuring this potential negative is mitigated.

Scope

- 13) There is a wide scope of relevant competences returning from the EU including animal health, animal welfare, agricultural policy, and trade policy. There is an opportunity to more clearly align all of the relevant "farm to fork" policies that are returning from the EU within the framework process.
- 14) Of the provisional draft Common Frameworks listed in the call for evidence the following are of most relevance to the veterinary profession:
 - Agricultural support
 - Animal health and welfare
 - Fisheries management and support: provisional common framework
- 15) A separate framework on food and feed safety and hygiene is also of relevance to our profession. BVA supports a holistic One Health approach that considers all aspects of animal health, animal welfare and wider issues of relevant public health including food safety. These do not necessarily need to form part of the same framework, but we need assurance that those interconnected issues will be considered together.
- 16) The future of agricultural support is of great interest to the veterinary profession because veterinary surgeons play an integral part of the agricultural and food sectors. Therefore, the

³ <https://www.bva.co.uk/media/3681/bva-submission-to-the-beis-white-paper-uk-internal-market-final.pdf>

Common Framework on agricultural support is of interest to the profession.

- 17) Veterinary surgeons are uniquely placed to advise and influence sustainable animal husbandry practices at whole-system levels, safeguarding animal health and welfare and influencing sustainable future livestock and food production. A new agricultural policy offers an opportunity to harness the power of this relationship and empower farmers and vets to collaborate to see positive outcomes on farm. Thus, the involvement of the veterinary profession within any system of agricultural support should be integral at every level including at the level of this Framework. BVA is well placed to support this framework as we have engaged in the development of new agricultural policies in England, Scotland, Wales and Northern Ireland.

Veterinary involvement

- 18) The effective operation of frameworks will depend greatly on veterinary involvement within government, especially between the four Chief Veterinary Officers (CVOs) of the United Kingdom. This is evident in the animal health and welfare provisional draft common framework, which references the four CVOs, and other government vets, on numerous occasions.
- 19) There are already good working arrangements established between the four CVOs and we are aware that they meet regularly. We trust the professionalism of the CVOs to build upon their existing relationships and take on this additional role to underpin this framework.
- 20) However, we are also aware that veterinary capacity within government, both operational and policy, has been tasked with substantial new responsibilities since EU exit. We would therefore request that appropriate resourcing is provided to properly manage the additional requirements of these frameworks.

Transparency and consultation

- 21) We agree with the need for the four governments and agencies such as the FSA and FSS to agree common approaches. Where there are agreements between governments as opposed to decisions by a single government there is a risk of a lack of transparency and an exclusion of outside stakeholders. The approach taken to this collaborative framework should endeavour to be as transparent as possible and ensure opportunities for consultation and engagement with key stakeholders.
- 22) The Animal Health and Welfare Common Framework notes that up until the end of the Transition Period most animal health and animal welfare law was harmonised at EU level, relying on EU processes and institutions to carry out most risk assessments, risk management decisions and develop and pass legislation. Legislation was developed by the European Commission and voted on at the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) by EU Member States.
- 23) SCoPAFF has its own webpage⁴ which provides a schedule of meetings. Ahead of meetings, agendas are shared publicly, and minutes are shared soon after. This level of transparency should at least be maintained, but this is also an opportunity to increase transparency.
- 24) Engagement with stakeholders outside government is essential and will add value to the decisions taken under the frameworks. BVA is well placed to provide input as we can draw upon the experiences and expertise of vets across the four parts of the UK. BVA's structures include our Scottish Branch, Welsh Branch and Northern Ireland Branch: each has their own officer team and Branch Council. Our branches provide BVA with the consensus view of members in Scotland, Wales and Northern Ireland and help shape policy development.
- 25) The different farm assurance schemes have a significant role to play in adoption of animal health and animal welfare standards and it will be essential that they are properly consulted within the Animal Health and Welfare Common Framework.

⁴ https://ec.europa.eu/food/horizontal-topics/committees/paff-committees_en

26) As the opportunity for divergence increases, the clear communication of government decisions to veterinary surgeons will become more important. Clear and speedy communications to the profession are vitally important particularly for disease control purposes. The common frameworks should ensure that effective communication of decisions is embedded in their work.

Confidence

27) BVA would stress the significance of the operation of these frameworks to UK exports. Safeguarding the UK's reputation for high animal health, animal welfare and the safety of food and feed produced in the UK and exported abroad must be at the heart of what the frameworks seek to achieve.

28) The governance structure that will be put in place and its functioning will be considered by foreign authorities when considering whether the UK should be listed for the export of food and feed as well as live animals and other products of animal origin such as germplasm.

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