

## **BVA response to the European Affairs Sub-Committee (Protocol on Ireland/Northern Ireland) Call for Evidence: Windsor Framework**

### **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. The BVA's Northern Ireland (NI) Branch brings together representatives of local veterinary associations, BVA's specialist divisions, Government, academic institutions, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.
3. We welcome the opportunity to respond to the European Affairs Sub-Committee's Call for Evidence on the Windsor Framework.

What is your overall assessment of the Windsor Framework? How far does it go to resolve the problems that have arisen with the Protocol? Does it leave any issues unresolved?

4. Overall, BVA believes that the Windsor Framework positively addresses many concerns of vets, farmers, agrifood businesses, and pet owners alike. Throughout the UK, the veterinary profession is managing with workforce shortages, and it is therefore encouraging that the proposals will simplify the flow of goods and minimise the need for veterinary intervention as animals and goods move across the Irish sea.
5. We are pleased to see efforts to simplify the requirements for pet owners travelling between Great Britain (GB) and Northern Ireland (NI). Under the NI protocol, pet owners who wished to transport companion animals between NI and GB had to obtain an EU pet passport and a rabies vaccination from a veterinary practice, as NI was a constituent part of the EU single market. Vets are concerned as this is an unnecessary vaccination as rabies is not present in GB or NI. Additionally, pet owners who wanted to travel between GB and NI had to acquire an Animal Health Certificate (AHC). If these rules had been fully enforced, veterinary practices would have had an increased workload, potentially without having the necessary capacity to deal with it. This could have placed greater strain on an already overstretched veterinary profession, which may have been detrimental to animal welfare. Therefore, the Windsor Framework's removal of the checks outlined in the NI Protocol is welcomed by the veterinary profession.

6. We recognise that in point 47 of the Windsor Framework, there is the statement to maintain an uninterrupted flow of veterinary medicines to Northern Ireland. However, the Windsor Framework does not propose a solution on how to achieve this. Although we welcomed the extension to the grace period at the end of 2025, we remain extremely concerned about this issue and we are committed to working with the UK Government, EU Commission, and other stakeholders to find a permanent solution. We welcome the Veterinary Medicines Directorate's (VMD) plans to engage with industry and the veterinary profession to find a permanent solution beyond the 2025 grace periods.
7. The Windsor Framework also represents a missed opportunity to have made animal welfare improvements to the GB-NI movement rules for livestock. Under the current regulations, cattle entering NI from GB must have export and NI tags applied and their GB tag removed. Retagging creates issues in terms of traceability, as well as being a stressful experience for the animals involved, with concern amongst vets regarding its necessity.
8. Greater clarification would be welcomed around EU requirements for the certification of animals/animal products moving into NI, with concerns existing that a reduction in checks would not necessarily translate into reduced requirements.

What is your assessment of the Windsor Framework's provisions in relation to customs procedures and the movement of goods between Great Britain and Northern Ireland, including the arrangements for 'green' and 'red' lanes, an enhanced Trusted Trader Scheme, handling of Tariff Rate Quotas and the system of commercial data-sharing?

9. Throughout the UK, the veterinary profession is managing workforce shortages. Any checks on goods that necessitate the involvement of vets could place further strain on an already fatigued workforce, therefore impacting the welfare of animals. It is consequently promising that the new proposals seek to minimise the need for veterinary intervention as animals and goods move across the Irish Sea through the removal of unnecessary checks.
10. BVA welcomes the move to the 'green' lane system, which allows Northern Ireland to have full access to the United Kingdom internal market, removing supply constraints created by the Protocol, notably on agrifood which forms a significant amount of GB to NI trade. Agrifoods bound for the NI market are no longer subject to checks at NI ports, and the need to produce Export Health Certificates, Phyto Sanitary certificates, and checks for individual items has been eliminated. The overall reduction in checks that are set out within the Windsor Framework is also beneficial to animal welfare, as it allows for a reduction in journey times for live animals.

How would you assess the new framework for agrifood retail trade into Northern Ireland agreed as part of the Windsor Framework? Does it go far enough in mitigating the issues that have been raised in relation to the arrangements for agrifood trade under the Protocol?

11. The Windsor Framework is positive for the agrifood retail trade into Northern Ireland, removing the barriers to trade which had been created by the Protocol and were disrupting the flow and availability of goods.
12. We welcome the move to reduce unnecessary paperwork, checks and duties on goods sold in Northern Ireland. The costly, officially signed and highly detailed certificates and extensive checks, which existed for individual animal products under the Protocol, created a series of difficulties for the veterinary profession, placing burden on a profession which was already dealing with the complications of workforce shortages. As a result, the implementation of many of the veterinary requirements had been delayed with a series of grace periods put in place to manage this.

What is your assessment of the proposals on pets, including a pet travel document and owner declaration for pets moving from Great Britain to Northern Ireland, and microchip identification for pets moving from Northern Ireland to Great Britain and back?

13. The proposals on pets are welcomed by BVA on the basis that they will remove costly and unnecessary processes for pet movements, meaning less paperwork for veterinary practices. They will also help to reduce over treatment and unnecessary procedures through their recognition of the UK's rabies and tapeworm free status.
14. The Windsor Framework proposals will create a simpler process for pet owners, with no requirements for those travelling from NI to GB, and the only requirements for those travelling into NI from GB being confirmation that the animal is microchipped and has a travel document, which is issued for the lifetime of the pet. This directly addresses the concerns of many pet owners, and will reduce the burden on vets, enabling pet movements to continue as easily as they did before Brexit.

In the context of the Framework, how would you assess the current situation with regard to veterinary medicines? What steps need to be taken to agree a long-term solution before the expiry of the grace period at the end of 2025?

15. BVA believes that the three-year extension to the grace period is a welcome step, however, it is essential that within this time period a long-term solution is found to secure access to veterinary medicines in Northern Ireland beyond 2025. To avoid uncertainty and additional stressors on the veterinary workforce BVA would wish to see a solution adopted as soon as possible.
16. Failure to obtain a permanent solution could see Northern Ireland lose access to 51% of the veterinary medicines it currently receives. This would affect all sectors – farm, equine, pigs, poultry, and pets – and will have significant implications on animal health and welfare, public health, trade, and the agricultural economy. The veterinary medicines affected will include anesthetics and vaccines, including salmonella vaccine for poultry, the loss of which would pose a serious public health issue and

due to Red Lion standards, mean that eggs from NI will not be able to be sold in GB. A failure to obtain preventive vaccines means an increase in usage of antibiotics. While a reduction in the portfolio of antibiotics mean that the most suitable antibiotics to treat animals may be discontinued. Both these have serious impacts for the development of antibiotic resistance in animals, then risking human health.

17. This issue has arisen as EU rules require that veterinary medicines must be batch tested and released to move from GB to NI along with having a marketing authorisation holder (MAH) based in NI or the EU, and not GB. The scale and cost of meeting these changes is likely to mean that companies will look to withdraw products from the NI market. It is therefore essential that a viable and efficient solution is found prior to the end of the grace period. There are also concerns around divergence, as the UK develops its own requirements, and around joint labelling, which will particularly effect products marketed in the UK and Republic of Ireland.
18. BVA is committed to working with the UK Government, EU Commission, and other stakeholders to find a permanent solution for veterinary medicines in Northern Ireland beyond 2025. We have identified the following potential permanent solutions.
  - a. Applying a grandfather rule to allow veterinary medicines that were aligned with regulation before Brexit to continue to be supplied to Northern Ireland, with newly licensed veterinary medicines then adhering to EU rules.
  - b. Examination of existing EU trade agreements, such as those with New Zealand, which allow food products into the EU. There is veterinary medicine regulatory alignment work in these deals, which could be utilised.
  - c. Finally, a minor amendment to EU law could be sought, which would allow veterinary medicines with a Marketing Authorisation Holder located in Great Britain to be used in Northern Ireland.