

BVA submission to Public Bill Committee: Agriculture Bill

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With 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 and welfare, public health, regulatory issues and employment matters.
2. We welcome the opportunity to respond to this inquiry into the Agriculture Bill which is currently before Parliament.

Introduction

3. EU Exit provides the opportunity to develop strong, competitive and innovative agriculture and food sectors which enjoy the confidence of customers at home and abroad.
4. The future of the UK agri-food production is of great interest and importance to the veterinary profession. Vets, working collaboratively with others, protect animals, people and the environment they share. Vets provide preventive healthcare and treatment for livestock, and carry out surveillance, promote good biosecurity, support high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.
5. Vets negotiate, draft and uphold necessary legislation and standards. By carrying out surveillance and enforcement from farm-to-fork. Official Veterinarians (OVs) certify compliance with domestic, European Union and World Organisation for Animal Health (OIE) standards. Certification underpins all trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production.
6. Thus, the involvement of the veterinary profession within any future agricultural policy will be vital to all aspects of policy development, review and implementation.

The Agriculture Bill

7. The Agriculture Bill itself largely functions as “enabling” legislation. It provides the government with the powers to allocate funds to agriculture and to intervene in the agriculture and food sectors. The Secretary of State is granted considerable discretion to regulate, determine interventions, and direct funding.

8. Defra released a policy statement alongside the previous version of this bill, “Health and Harmony: the future for food, farming and the environment in a Green Brexit”¹ which explains the intended policy the legislation will be used to enable. An updated policy statement² was published on 25 February 2020 giving more timely detail.

Public money for public goods

9. The legislation would enable a recalibration of the system of agricultural support in England, with a phased withdrawal of direct payments to farmers. The central principle of the new policy, which forms Part 1 of the Bill, is that public money should support public goods that benefit producers, consumers and wider society.
10. We support this approach of public money for public goods and welcome this enshrining in legislation. We also welcome the specific inclusion of “protecting or improving the health or welfare of livestock” amongst the public goods which could receive financial support. It is welcoming to note consultation responses to the “Health and Harmony” consultation “showed that high standards of welfare are a priority for the public and the sector.”³
11. The adjoining policy statement gives an overview of the ways in which the “public goods” could be supported during the agricultural transition period and beyond. We welcome the comprehensive approach where multiple policy levers open to government to improve animal health and welfare (regulation, funding, consumer information, data utilisation) are considered together. Crucially the design of animal health interventions should incorporate animal welfare and vice-versa, as the two are intrinsically linked.
12. Vets are the trusted advisors to farmers and uniquely positioned to offer advice and provide essential services which play a key role in the package of measures necessary to protect and improve animal health and welfare. Consequently, the inclusion of the veterinary profession in the design of a new system is essential.
13. We welcome the involvement of vets to date. In particular, the presence of BVA on the steering group of the Animal Health Pathway has offered a worthwhile opportunity to develop a new approach to preventing endemic disease, improving the health of livestock and raising animal welfare standards on farm.

Interconnected outcomes

14. Animal health and welfare is interwoven with many social, economic and environmental outcomes. We would caution against an approach which creates silos between animal

¹ Defra, Health and Harmony: the future for food, farming and the environment in a Green Brexit - policy statement, 14 September 2018 <https://www.gov.uk/government/publications/the-future-for-food-farming-and-the-environment-policy-statement-2018/health-and-harmony-the-future-for-food-farming-and-the-environment-in-a-green-brex-it-policy-statement>

² Defra, The future for food, farming and the environment: policy statement (2020) Publish 25 February 2020 <https://www.gov.uk/government/publications/the-future-for-food-farming-and-the-environment-policy-statement-2020>

³ Ibid

health and welfare schemes and those that seek to increase productivity or improve the environment. Such an approach would fail to maximise the benefits of evident synergies.

Productivity

15. We welcome the financial assistance available to improve agricultural productivity. The veterinary profession plays a pivotal role in increasing productivity while ensuring animal health and welfare needs are met. We support the definition of productivity used within the legislation which emphasises quality and efficiency in production.
16. Schemes designed to assist productivity should incorporate animal health and welfare as improved animal health outcomes benefit productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading to a more financially resilient sector. This was most clearly illustrated by the Foot and Mouth outbreak in 2001. This was estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities, harmed the reputation of UK agriculture and caused a general election to be postponed.⁴ More recently, it is estimated that the Bluetongue vaccination programme in 2008 has saved £460 million and 10,000 jobs in the UK, not to mention countless animal lives.⁵
17. Michael Gove MP, at the time Secretary of State for Environment, Food and Rural Affairs, stated that “high animal welfare standards and high environmental standards reinforce the marketability of our produce.”⁶ Therefore, agricultural policy should support animal health and welfare which underpins the reputation of UK agricultural produce. This reputation allows UK produce to add value to produce by marketing to discerning, value-added markets.

Environment

18. The policy statement considers environmental public goods and animal health and welfare public goods separately. However, the two can be mutually beneficial and should be integrated more closely. Examples include:
 - Incentivising innovative whole farm management systems could integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products.
 - To mitigate against climate change, advances in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare.
 - Anthelmintics are widely used to control gastrointestinal parasites of livestock. However, the residues of these compounds, particularly the macrocyclic lactones, are excreted in faeces, where they may have toxic effects on dung-colonising insects. A vet-directed parasite plan will allow production and animal health outcomes to be met alongside the protection of biodiversity.

⁴ National Audit Office, *The 2001 Outbreak of Foot and Mouth Disease*, 2002

⁵ RCVS Research Subcommittee 2013 *Veterinary research in the UK: a snapshot*, 2013

⁶ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

- Reduced antimicrobial use in livestock can lead to:
 - Fewer resistant bacteria contaminating an environment.
 - Lower levels of antimicrobials entering the environment, reducing the risk that there may be selection for antimicrobial resistance in environmental bacteria.

19. An environmental benefit scheme on land where livestock is kept must include animal health and welfare. For example, a farm with serious sheep scab infection in the flock should not be receiving funding for an environmental scheme in the absence of a parallel programme to eradicate sheep scab.

Veterinary capacity

20. Both private veterinary surgeons and Government employed veterinary surgeons make every on-farm contact count by providing a holistic approach to overall herd health and welfare. An ambitious agriculture policy will not achieve its aims without contributions from the veterinary profession.

Current capacity concerns

21. The Major Employers Group (MEG), which represents some of the largest UK veterinary businesses providing primary care, conducted a survey looking at vacancy rates amongst its members in November 2018. The results showed that there were 890 vacancies in member practices employing over 7700 veterinary surgeons providing primary care directly to the public in the UK. This represented a veterinary workforce shortage of approximately 11.5%.

22. In the Migration Advisory Committee review of the Shortage Occupation List published in May 2019,⁷ this shortage of vets was recognised:

23. “It is clear from the stakeholder evidence that they [vets] are facing significant recruitment difficulties. Furthermore, the SOC code ranks 44th in the shortage indicators which indicates it is in relative shortage compared to other occupations. The vacancy rate has been increasing over recent years, apart from a dip in 2016/17, however, still above average.”

Additional demands

24. At the end of the transition period, there will be increased demand for veterinary certification and supervision. Official government advice notes that to transport animals, products of animal origin or germplasm from the UK to the EU from 1 January 2021, exporters will require an export health certificate signed by an Official Veterinarian (OV).⁸ There are material uncertainties and limitations on knowing what the increase in export

⁷ Full review of the shortage occupation list, May 2019 <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

⁸ Guidance Exporting animals and animal products to the EU from 1 January 2021 <https://www.gov.uk/guidance/exporting-animals-animal-products-fish-and-fishery-products-if-the-uk-leaves-the-eu-with-no-deal>

health certification is likely to be. However, when preparing for a no deal exit in 2019, Defra's "mid estimate" assumption was a fivefold increase in the number of export health certificates.⁹

25. No deal guidance issued by the government provided assurances that imports of live animals and products of animal origin from the EU would not be subject to veterinary checks.¹⁰ On 10 February 2020 Michael Gove MP,¹¹ the Chancellor of the Duchy of Lancaster, announced that businesses should now prepare for border checks for imports from the EU after the post-Brexit transition period ends.
26. Under these requirements, vets would be required to carry out certification checks for all animal products being imported into the UK, with multiple certificates required for consignments with a range of different products. This change means that despite the mitigation the veterinary profession has put in place to attempt to meet the increase in certification needed for export checks, it is unlikely as it currently stands that the UK would have sufficient capacity to meet those for imports as well.

Future immigration system

27. In recent years over half of the veterinary surgeons who register in the UK each year qualified elsewhere in the EU/EEA. According to Royal College of Veterinary Surgeons 2018 registration data, new UK registrants qualified in the following locations:¹²
- 38.5%- UK
 - 52%- EU/ EEA
 - 9.5%- 3rd countries
28. In the meat hygiene sector, this is particularly acute. The FSA estimates 95% of the veterinary workforce in abattoirs graduated overseas - with the clear majority of these coming from the EU.
29. Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EEA qualified vets to the UK will have significant consequences for animal health, animal welfare, public health, and trade.
30. On 18 February 2020, the government set out its plans for a new immigration system.¹³ Once free movement ends in January 2021, it will be replaced with 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 leaves a big question mark over whether the

⁹ Letter from Christine Middlemiss, UK Chief Veterinary Officer

¹⁰ Defra, Guidance Importing animals and animal products if there's no Brexit deal
<https://www.gov.uk/government/publications/importing-animals-and-animal-products-if-theres-no-brexit-deal/importing-animals-and-animal-products-if-theres-no-brexit-deal>

¹¹ Cabinet Office, 10 Feb 2020, Government confirms plans to introduce import controls
<https://www.gov.uk/government/news/government-confirms-plans-to-introduce-import-controls>

¹² Data provided by Royal College of Veterinary Surgeons

¹³ Policy paper The UK's points-based immigration system: policy statement Published 19 February 2020

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.

Standards in trade deals

31. High UK animal welfare, animal health and public health (including food safety) standards should not be undermined by imports produced to lower standards. As public goods, recognised within the Agriculture Bill, the UK should uphold these standards in all trade negotiations.
32. Allowing goods onto the UK market which fail to meet current UK standards of animal health, animal welfare and public health would increase the need for Sanitary and Phytosanitary (SPS) checks on all goods leaving the UK and entering the EU Single Market. The application of the Northern Ireland protocol of the Withdrawal Agreement would mean these same checks would potentially be required for goods moving from Great Britain to Northern Ireland. This would place an additional administrative and cost burden on producers and increase the potential for delays.
33. The animal health, animal welfare and public health standards of goods entering the UK should be required to meet the same standards expected of UK producers. This position is shared with the NFU and other farming and animal welfare organisations.¹⁴ This principle should be enshrined in law and the Agriculture Bill provides an opportunity for that legislation.

¹⁴ <https://www.nfuonline.com/news/eu-exit/eu-exit-news/letter-to-prime-minister-nfu-leads-charge-on-trade-and-standards-asks-ahead-of-brexite/>