

BVA submission to the Public Bill Committee: Trade Bill 2019-21

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 and welfare, public health, regulatory issues and employment matters.

Introduction

2. We welcome the opportunity to provide evidence on the Trade Bill 2019-21, which gives the Government powers to implement 'rolled-over' trade agreements, effectively replacing trade agreements the UK had as an EU Member State. We understand that the Bill is not intended to deal with future new trade agreements, and we remain keen to engage with DIT and Defra on matters relating to the role of veterinary surgeons in the trade of animals and products of animal origin.
3. Continuity in trading relations will be crucial for the profitability and sustainability of the UK livestock industry, within which the veterinary profession plays a key role from farm to fork. As such we warmly welcome the Government's aim of providing such continuity after Brexit by negotiating roll-over trade agreements with partner countries.

The role of vets in trade

4. Vets both certify and supervise the import and export of animals and animal products to and from third countries. The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. To continue to trade, the UK will need enough vets to meet the additional demands for export and import certification.
5. From January 2021, exporters will require an export health certificate (EHC) signed by an Official Veterinarian (OV) to transport animals, products of animal origin or germplasm from the UK to the EU. The OV signature attests that relevant public and animal health requirements have been met. The requirement for EHCs will be similar if the UK and EU reach a free trade agreement, or if no trade deal is agreed. However, there are material uncertainties and limitations on knowing what the exact increase in export health certification 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.
6. Where third countries export into the EU, EU Law requires animals and products of animal origin to enter via a designated border control post for documentary, identity and physical checks by vets. A veterinary agreement could be reached between the UK and EU, similar to that between the EU and New Zealand, which could significantly reduce the level of physical checks. However, this would not eliminate all checks or the need for infrastructure.
7. 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. On 10 February 2020 Michael Gove MP, 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.

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8. Under these requirements, vets would be required to carry out certification checks for all animal products being imported into the UK. This change means that despite mitigations 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 veterinary capacity to meet those for imports as well.

Standards in trade deals

9. The UK must safeguard its high reputation for animal health, animal welfare, and food safety. In all trade agreements it negotiates, the government must secure the inclusion of equally high standards of animal health, animal welfare, public health and food safety and responsible antibiotic use.
10. 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.

Trade Remedies Authority

11. We support proposals to establish a UK body – the Trade Remedies Authority (TRA) – to ensure the UK can continue to protect domestic industries against injury caused by unfair trading practices, such as dumping and unforeseen surges in imports. This non-departmental public body, responsible for conducting trade remedies investigations under a statutory framework provided by the Taxation (Cross-border Trade) Act 2018 and for making impartial recommendations to the Secretary of State, should provide a critical safety net for the livestock industry.

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