

BVA Northern Ireland Branch submission to the House of Lords Committee: NI protocol and agrifood

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.
2. BVA Northern Ireland Branch exists to represent members in Northern Ireland. It brings together representatives of our specialist divisions, Government, academic institutions, and research organisations in Northern Ireland, as well as representatives from the North of Ireland Veterinary Association and the Association of Veterinary Surgeons Practising in Northern Ireland.

What do you expect the sanitary and phytosanitary (SPS) formalities to be for goods moving from Great Britain to Northern Ireland after the transition period, and how different is this from the current arrangements?

3. According to the Protocol, Northern Ireland will remain aligned to a range of EU single market rules, including sanitary rules for veterinary controls. At present there are controls on bringing livestock into Northern Ireland from Great Britain to try to protect the health of the animals already in the province, and also the health of people, because some animal diseases can be passed from animals to humans. DAERA uses legislation to control imports, and the main tools that it uses for imports from Great Britain are import licences. Consequently, some infrastructure will be in place to provide a portion of the controls that may be required from 1 January 2021. However, the volume of additional products which may require checks will be much greater than the current volume of live animals.
4. From January 2021, exporters will require an Export Health Certificate (EHC) signed by an Official Veterinarian (OV) to transport animals, germplasm and products of animal origin from Great Britain to the EU Single Market. Products of animal origin include meat and milk as well as composite products like pizzas, quiches, and pet food. Composite products are particularly complex and may require multiple EHCs to provide an audit trail of each individual ingredient.
5. It seems likely that 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 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.
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.

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How will these arrangements affect the agrifood sectors, and how can their impact be lessened?

7. These additional checks, alongside other trade requirements (e.g. customs checks) could add considerable time to journeys, which may be detrimental to animal welfare, in the case of live animals, or to the shelf life of products of animal origin.
8. 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.

What processes do you expect to see put in place for product-related regulatory controls, for agrifood goods moving from Great Britain to Northern Ireland, and how would these affect the agrifood sector?

9. 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.
10. 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.

How can the UK-EU future relationship reduce any possible negative impacts of the Protocol on the agrifood sector?

11. The NI veterinary workforce is heavily dependent on EU vets. The Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union or from outside the EU, to ensure this essential veterinary work continues.

How can the Government better engage with and provide support to you and the wider Northern Ireland agrifood sector?

12. We welcome ongoing opportunities to respond to consultations across government departments and the devolved administrations on matters relating to animal health and welfare, public health, and trade and investment. Government should continue to recognise the critical role vets play in food safety and national biosecurity and ensure prompt and full consultation where appropriate. BVA Northern Ireland Branch exists to represent members in Northern Ireland. It brings together representatives of our specialist divisions, Government, academic institutions, and research organisations in Northern Ireland, as well as representatives from the North of Ireland Veterinary Association and the Association of Veterinary Surgeons Practising in Northern Ireland. As such Branch is extremely well placed to advise on the consensus view of members in Northern Ireland, many of whom work directly in the Northern Ireland agrifood sector. Ongoing engagement with

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Branch, via the secretariat at BVA HQ, should be a priority for Government when considering support for the sector.

Are enough veterinarians being recruited?

13. From 1 January 2021, there will be increased demand for veterinary certification and supervision for goods (live animals and products of animal origin) and potentially equine and pet animals moving from Great Britain to Northern Ireland. At the same time, there will be increased demands for veterinary certification and supervision of goods moving from Great Britain to the European Union. Sufficient veterinary capacity will be needed to fulfil this demand.
14. UK veterinary practices are already experiencing difficulties recruiting. In November 2018 the Major Employers Group (MEG), which represents some of the largest UK veterinary businesses, estimated a veterinary workforce shortage of approximately 11.5%, based on vacancy rates. In recent years over half of the veterinary surgeons who register in the UK each year qualified elsewhere in the EU/EEA.
15. In February 2020 the government set out its plans for a new immigration system. 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 that will be required to sponsor recruits from outside of the UK. This new immigration system leaves a big question mark 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.

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