

BVA response to the Committee on the Future Relationship with the European Union

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.

The veterinary profession

2. The veterinary profession is relatively small, with around 23,220 UK-practising veterinary surgeons,¹ but its reach and impact are significant. The UK veterinary profession plays an essential role using science, experience and practical skills to further animal health, animal welfare, public health and productivity. Official statistics put the value of UK livestock outputs at £14.8bn, not a penny of which could be realised without the input of the veterinary workforce.²
3. The veterinary profession is diverse, with far-reaching influence and impact:
 - production animal clinical practice, which provides preventive healthcare and treatment for livestock, as well as carrying out disease surveillance, promoting good biosecurity, boosting productivity and maintaining standards of animal welfare;
 - companion animal and equine practice looking after family pets, leisure and sport animals as part of the local community;
 - aquaculture, providing the UK sector with dedicated evidence-based veterinary services
 - abattoirs and throughout the food chain, where official controls is key to securing public health, food safety, animal welfare and assurance for consumers in domestic and foreign markets;
 - veterinary schools and independent research laboratories, which advance our scientific understanding of veterinary medicine and animal production systems;
 - industry and technology ensuring the UK remains competitive and forward thinking in many areas; and

¹ RCVS Facts 2017, 2018 RCVS Facts (2017)

² Defra, DAERA, Welsh Government, Scottish Government, Agriculture in the United Kingdom 2018, 2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/815303/A_UK_2018_09jul19.pdf

- veterinary surgeons working in the civil service, who provide veterinary expertise to public policy making.

Trade

4. Veterinary surgeons, 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 facilitate trade, the UK will need enough vets to meet the additional demands for export and import certification that may be required.

Exports

5. 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 (POAO) from Great Britain to the EU Single Market. This includes meat, milk and pet food as well as composite products like pizzas and quiches. Composite products are particularly complex and may require multiple EHCs. For example, a cheese and ham sandwich will require a certificate for both the cheese and ham to provide an audit trail of each individual ingredient.
6. It seems likely that the requirement for EHCs will be similar, whether or not the UK and EU reach a free trade agreement. However, there are material uncertainties and limitations that mean it is not possible to calculate what the exact increase in export health certification requirements will be. When preparing for a no-deal exit the then Chief Veterinary Office of the UK, suggested that the volume of products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK.³

Imports

7. On 10 February 2020, the Chancellor of the Duchy of Lancaster announced that businesses should prepare for border checks for imports from the EU after the transition period ends. Latest guidance⁴ indicates these requirements will be phased in. From April 2021 all POAO will also require pre-notification and the relevant health documentation. From July 2021 there will be an increase in physical checks and the taking of samples. Checks for animals, plants and their products will now take place at GB Border Control Posts.
8. Under these requirements, live animals or POAO would need to be accompanied by an EHC and vets would be required to carry out documentary, identification and physical checks on imports into Great Britain from the EU Single Market. This change means that despite mitigations that have previously been 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

³ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brex-it-says-cvo/>

⁴ <https://www.gov.uk/government/news/government-accelerates-border-planning-for-the-end-of-the-transition-period>

will have sufficient veterinary capacity to meet those for imports as well.

9. Following the end of the transition period, the UK will hold the competence for designing its own Sanitary and Phytosanitary (SPS) control regime. It is essential that the veterinary profession is engaged in this process to ensure animal health, animal welfare and public health are upheld whilst using our workforce efficiently and effectively.
10. Furthermore, the final details of the UK's future relationship with the EU are unknown. A veterinary agreement could be reached between the UK and EU. This could form part of a comprehensive trade agreement or be standalone. Given the current symmetry in standards, an agreement like that between the EU and New Zealand could be reached. This could significantly reduce the level of physical checks on both sides. However, this would not eliminate all checks or the need for infrastructure.

Northern Ireland Protocol

11. In our response to the Northern Ireland Affairs Committee inquiry we provide a detailed analysis of the import trade requirements needed for POAO moving between Northern Ireland and Great Britain.⁵
12. The Withdrawal Agreement sets out the arrangements to maintain an open border on the island of Ireland after the end of the transition period. Northern Ireland will remain aligned to a range of EU single market rules, including sanitary rules for veterinary controls. Consequently, the requirements for trade relating to Northern Ireland will have unique factors which will have draws on veterinary capacity.
13. The European Commission's Q and A⁶ says:
 - a. The necessary checks and controls will take place on goods entering Northern Ireland from the rest of the UK, including, for example, Border Inspection Posts to ensure that the necessary sanitary and phytosanitary ("SPS") controls are carried out.
14. A joint committee holds responsibility for determining the practical arrangements for EU supervision of UK implementation and enforcement of specific aspects of the Protocol. There is scope for the joint committee to consider approaches that may limit the need for EHC documents or veterinary checks for goods entering Northern Ireland from Great Britain. However, it would appear this scope is much narrower than that open to customs issues.
15. The final details of the UK's future relationship with the EU, including the operation of the Northern Ireland Protocol, are unknown. However, it appears likely that these requirements for goods moving from Great Britain to the EU Single Market will apply to

⁵ BVA written evidence to Northern Ireland Affairs Committee Unfettered Access: Northern Ireland and customs arrangements after Brexit inquiry <https://www.bva.co.uk/media/3456/bva-written-evidence-to-northern-ireland-affairs-committee-unfettered-access-northern-ireland-and-customs-arrangements-after-bre.pdf>

⁶ https://ec.europa.eu/commission/presscorner/detail/ro/QANDA_19_6122

goods entering Northern Ireland. Therefore, EHCs would likely be required. Northern Ireland ports will also require border infrastructure and qualified official vets in place to perform checks on goods entering Northern Ireland. The requirement for border checks in Northern Ireland would come into effect on 1 January 2021, not the phased approach expected for ports in Great Britain.

16. Article 6(1) on “protection of the UK internal market” provides that the Protocol shall not prevent “unfettered market access for goods” moving from Northern Ireland to Great Britain. It sets out that there will be no restrictions of any kind on goods moving from Northern Ireland to the remainder of the United Kingdom.

Future trade deals

17. EU exit presents opportunities for the UK to negotiate new trade deals with other countries. These offer the potential for the UK to import animals and animal products that have been reared to lower animal health and animal welfare standards. 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. This principle should be enshrined in legislation.
18. One high profile example is the issue of chlorine-washed chicken which should be excluded on animal welfare grounds. These chickens can be kept in poor conditions with chemicals used to disinfect carcasses at the end of the production process. Furthermore, there are increasing public health concerns. One study⁷ has found that this process gives the false impression that the chlorine washing has been effective when it has merely made it impossible to detect disease in the lab.
19. The use of growth promoters is banned, or severely restricted for clinical use only, in the UK. Bovine somatotropin (BST) has been banned in the UK since 1990, with a report on animal welfare aspects of the use of bovine somatotropin from the Scientific Committee on Animal Health and Animal Welfare concluding that “Where BST increases milk yield and also thereby increases mastitis, foot or leg problems, reproductive disorders or other production-related disease, then BST is causing poor welfare which would not occur if it were not used” . Bovine somatotropin is routinely used in the US, where the beef industry utilises growth promoting compounds with a focus on improvements in efficiency and cost of production. Several other key classes of growth promoters are also used widely, either as feed additives or as hormone-impregnated implants that are inserted beneath the skin of the ears.
20. The US could attempt to set up dedicated UK standard supply chains. However, there are concerns that any system that would introduce two standards of production,

⁷ Highmore et al. (2018)Viable-but-Nonculturable *Listeria monocytogenes* and *Salmonella enterica* Serovar Thompson Induced by Chlorine Stress Remain Infectious <https://mbio.asm.org/content/mbio/9/2/e00540-18.full.pdf>

processing or certification for export markets could increase the risk of food fraud and potentially compromise animal welfare. Therefore, there would be the require for the introduction of robust auditable tracing systems from birth to export.

21. Allowing goods onto the UK market which fail to meet current UK standards of animal health, animal welfare and public health could increase the complexity of 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.
22. In June, BVA welcomed the announcement from the International Trade Secretary that a new Trade and Agriculture Commission would be established. The advisory Commission will consider the policies that the UK Government should adopt in free trade agreements to ensure UK animal welfare and production standards are not undermined.
23. However, we have serious concerns over the balance of expertise on the Commission. Only one member of the 16-strong group is a veterinary surgeon, while nine members were representing industry and retail bodies. We have written to the International Trade Secretary to raise these concerns.

Veterinary capacity

24. To continue to trade and benefit from any new trade relationships, the UK will need enough vets to meet the demand for export and import certification. However, at present there the veterinary profession is concerns that there is insufficient capacity within the profession to meet this increased demand.
25. 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 7,700 veterinary surgeons providing primary care directly to the public in the UK. This represented a veterinary workforce shortage of approximately 11.5%.
26. In the Migration Advisory Committee review of the Shortage Occupation List published in May 2019,⁸ this shortage of vets was recognised:

“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.”

Immigration

⁸ Full review of the shortage occupation list, May 2019 <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

27. The important economic, social and political contributions of the veterinary profession would be impossible without EEA vets. As the Government response to the House of Lords EU Energy and Environment Sub-Committee notes:
- “Many vets working in the UK are EU nationals...and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority.”⁹
28. The RCVS Survey of the Profession 2019¹⁰ provides data on vets currently registered in the UK:
- 63.9% UK Graduates
 - 21.6% in an EEA/EU/EFTA country
 - 4.7% Graduated in Republic of Ireland
 - 9.8% Graduated elsewhere
29. According to RCVS data, in recent years over half of the veterinary surgeons who register in the UK each year qualified elsewhere in the EEA. This data illustrates our existing reliance on non-UK graduates within the veterinary profession. 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. These OVs perform a vital role verifying compliance with food safety, public health, animal health and welfare standards and provide assurance to consumers at home and overseas that underpins trade.
30. 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 create significant consequences for animal health, animal welfare, public health, and trade.
31. On 18 February 2020, the government set out its plans for a new immigration system.¹¹ Once free movement ends in January 2021, it will be replaced with an employer-led points-based system. This new immigration system leaves a big question about 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. A visa-based system will place significant administrative and financial burdens on veterinary businesses, who will be required to sponsor recruits from outside of the UK.
32. Furthermore, if the UK establishes additional barriers this could make other countries within the EEA more attractive for EEA vets. They will be able to provide certainty to EEA vets and frictionless access to residency and work. Progress has been made in the EU to hire vets to undertake additional veterinary checks on animals and products of animal

⁹ Government Response to the House of Lords European Union Committee Report on Brexit: Farm Animal Welfare <http://www.parliament.uk/documents/lords-committees/eu-energy-environment-subcommittee/Brexit-farm-animal-welfare/Gov-Brexit-farm-anim.pdf>

¹⁰ The 2019 Survey of the Veterinary Profession <https://www.rcvs.org.uk/news-and-views/publications/the-2019-survey-of-the-veterinary-profession/>

¹¹ Policy paper The UK's points-based immigration system: policy statement Published 19 February 2020

origin from the UK. For example, the recent Irish Budget provided €7m for staff and IT costs arising from additional import control and export certification requirements arising as a result of Brexit.

33. According to the RCVS, across UK veterinary schools there were 5,295 veterinary undergraduate students in 2017 (over a five-year course). Of these, 129 were from the EU and 1,016 were from third countries.¹² Therefore, we welcome the proposal to allow international graduates a period of two years after graduating during which they can apply to switch their UK study visa to a UK work visa from outside the UK. This could permit some of these third-country graduates to remain in the UK, where they have gained their clinical skills.

Mutual recognition of the veterinary qualification

34. As can be seen above, EU-qualified veterinary surgeons make up a critical part of the UK veterinary workforce. This has been facilitated by existing arrangements where EU-qualified vets have the freedom to practise in the UK. In order to meet the anticipated demands on the veterinary workforce, limiting barriers to EU qualified vets being able to come to work in the UK, whilst upholding high professional standards, must be the priority for any future system of qualification recognition.

35. Currently, under the Mutual Recognition of Professional Qualifications Directive (MRPQ), EEA qualified vets have the automatic right to register with the Royal College of Veterinary Surgeons (RCVS) to practise in the UK. In turn, UK vets have the right to live, register and work elsewhere in the EU.

36. If no trade deal has been agreed with the EU by 31 December 2020, then the MRPQ Directive may cease to apply. However, if this is the case, an amendment to the Veterinary Surgeons Act passed in February 2019 means vets will be able to join the Register without sitting the Statutory Membership Examination if their veterinary school is approved or accredited by the European Association of Establishments for Veterinary Education (EAEVE) at the time of their graduation. In the longer term, the RCVS plan to seek an arrangement that will give assurances on standards at European veterinary schools.

37. Recognition of qualifications could form part of a trade deal with the EU. In “The Future Relationship with the EU: The UK’s Approach to Negotiations” the UK sets out its approach to the recognition of professional qualifications:

“The Agreement should provide a pathway for the mutual recognition of professional qualifications, underpinned by regulatory cooperation. Comprehensive coverage would ensure that qualification requirements do not become an unnecessary barrier to trade in regulated services, across the modes of supply, between the UK and the EU.

¹² RCVS Facts 2017

The Agreement should ensure that the parties can set their own professional standards and protect public safety. The parties should explore how competent authorities could recognise applicants who demonstrate that they meet the host states' standards.¹³

38. On 19 May 2020, the UK government published its own draft Comprehensive Free Trade Agreement.¹⁴ This sets out a more ambitious approach to have British qualifications recognised by default across the EU, subject to terms and conditions.

39. We support the UK Government's aim of negotiating mutual recognition of professional qualifications, underpinned by regulatory cooperation, through a trade deal with the EU. Going forward, the veterinary profession must be engaged in this process to ensure the protection of standards and workforce capacity.

¹³ The Future Relationship with the EU: The UK's Approach to Negotiations

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/868874/The_Future_Relationship_with_the_EU.pdf

¹⁴ HM Government, Draft Comprehensive Free Trade Agreement

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/886010/DRAFT_UK-EU_Comprehensive_Free_Trade_Agreement.pdf