

BVA response to the External Affairs and Additional Legislation Committee inquiry: Exiting the European Union: Preparedness in Wales for the end of the transition period

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. BVA Welsh Branch represents members in Wales, bringing together representatives of specialist and territorial divisions, government, academic institutions and research organisations in Wales. The branch advises BVA on the consensus view of members in Wales on Welsh and UK issues.

Introduction

3. 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
4. The important economic, social and political contributions of the veterinary profession would be impossible without European Economic Area (EEA) vets. As the Government response to the House of Lords EU Energy and Environment Sub-Committee notes:
5. "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."³
6. The veterinary profession is diverse, with far-reaching influence and impact:

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/AUK_2018_09jul19.pdf

³ 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>

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

Veterinary capacity

Current capacity concerns

7. 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%.
8. In the Migration Advisory Committee review of the Shortage Occupation List published in May 2019,⁴ 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.”

Additional demands

9. 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,

⁴ Full review of the shortage occupation list, May 2019 <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

protecting public health, food safety, animal health and animal welfare is recognised around the world. At the end of the current transition period, there will be increased demand for veterinary certification and supervision, and this will create additional demands on the limited capacity of the veterinary workforce. The UK needs enough vets in place to meet these additional demands. No detailed analysis has been undertaken by government to determine the numbers of vets that will be needed to undertake this work.

Exports

10. 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.
11. 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.⁵

Imports

12. 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 guidance⁶ 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.
13. Under these requirements, live animals or POAO would need to be accompanied by an EHC and vets would be required to carry out certification checks for animal products being imported 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 will have sufficient veterinary capacity to meet those for imports as well.

⁵ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brexit-says-cvo/>

⁶ <https://www.gov.uk/government/news/government-accelerates-border-planning-for-the-end-of-the-transition-period>

14. 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.

15. 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

16. 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.⁷

17. 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 draw on veterinary capacity.

18. The European Commission's Q and A⁸ 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.

19. 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.

20. 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 the requirements for goods moving from Great Britain to the EU Single Market will apply to 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

⁷ 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>

⁸ https://ec.europa.eu/commission/presscorner/detail/ro/QANDA_19_6122

would come into effect on 1 January 2021, not the phased approach expected for ports in Great Britain.

21. 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.

Equine Movements

22. The UK will likely be subject to EU third country rules relating to equine movements. Third countries apply to the European Commission to become listed to allow equine movements to the EU to take place. The listing is based on the health status of the country with requirements dependent on the perceived level of disease risk. During no deal Brexit preparations in 2019, the EU Commission agreed the UK’s listed status application after it met the animal health and biosecurity assurances required for a third country to export live animals and animal products including equines. The UK may need to reapply for this status ahead of the end of the transition period.
23. When the UK becomes listed, horses would need both an appropriate ID document and appropriate health documentation to travel to the EU. As the UK would be a third country, an Export Health Certificate (EHC) would be required to move equines, on a permanent or temporary basis, to the EU. This would require additional action from vets to confirm the absence of disease. This new process would require more planning from the equine owner and could involve increased cost if additional tests are required.
24. It is uncertain if these requirements will be applied to equine movements between Great Britain and Northern Ireland.

Pet Travel

25. At present, The Pet Travel Scheme (PETS) is in operation. This means that with a Pet Passport companion animal (cats, dogs and ferrets) can re-enter the UK from the EU without having to be quarantined. In theory, this applies to movements of pets between Northern Ireland and the Republic of Ireland. In practice, the requirement for a Pet Passport to visit the Republic of Ireland has often not been enforced. This will be of particular interest to Wales due the number of animals that currently cross on the ferries between Wales and Ireland.
26. Official government guidance⁹ notes that the UK will become a third country from 1 January 2021. Third countries can apply to the European Commission to be listed. Pet travel requirements will change depending on what category the UK becomes on 1 January 2021.

⁹ <https://www.gov.uk/guidance/pet-travel-to-europe-after-brexit>

27. If the UK becomes an unlisted country from 1 January 2021, before someone can travel to the EU with their pet they will need to take the following steps:

- Owners must have their dog, cat or ferret microchipped and vaccinated against rabies.
- Their pet must have a blood sample taken at least 30 days after its last rabies vaccination. Their vet may recommend a booster rabies vaccination before this test.
- The pet's blood sample will be sent to a to an EU-approved blood testing laboratory.
- Wait 3 months from the date the successful blood sample was taken before they can travel.
- An OV must give the owner a copy of the test results and enter the day the blood sample was taken in an animal health certificate (AHC).
- Pet owners will not be able to travel with their pet if they have not completed these steps.
- If the blood test result is not successful, they will need a repeat vaccination and another blood test taken at least 30 days after the repeat vaccination.

28. If the UK becomes a Part 1 listed country, pet owners must have their pet microchipped and vaccinated against rabies at least 21 days before travel. They will need to make sure their pet's rabies vaccinations are kept up to date and ensure dogs receive tapeworm treatment if needed. They must also apply for a new document, the UK pet passport. They can use this for travel to the EU for their pet's lifetime (or until full) if the pet's rabies vaccinations are kept up to date.

29. If the UK becomes a Part 2 listed country, owners must have their pet microchipped and vaccinated against rabies at least 21 days before travel. They will need to make sure the pet's rabies vaccinations are kept up to date and make sure dogs receive tapeworm treatment if needed. Owners would be required to visit an OV no more than 10 days before you travel to get an AHC confirming that the pet is microchipped and vaccinated against rabies. The pet will need a new AHC for each trip to the EU if the UK becomes a Part 2 listed country.

30. In all cases, on arrival in the EU, pet owners travelling with pets will need to enter through a designated travellers' point of entry (TPE). At the TPE, pet owners may need to present proof of microchip, rabies vaccination and tapeworm treatment if required.

31. It is uncertain if these requirements will be applied to movements between Great Britain and Northern Ireland. Currently advice on the NI Direct website pet travel advice does not extend beyond the transition period.¹⁰

Future trade deals

¹⁰ <https://www.nidirect.gov.uk/articles/taking-your-pets-abroad>

32. EU exit presents opportunities for the UK to negotiate new trade deals. To benefit from any new trade deals, the UK will need enough vets to meet the demand for export certification.
33. Additionally, new trade deals 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.
34. One high profile example is the issue of chlorine-washed chicken, which the BVA recommends should be excluded on animal welfare grounds. These chickens can be kept in poor conditions that are not in line with the Animal Welfare requirements delivered by UK farmers, with chemicals used to disinfect carcasses at the end of the production process. Furthermore, there are increasing public health concerns related to this process, with one study¹¹ finding that this process gives the false impression that the chlorine washing has been effective when, in reality, it has merely made it impossible to detect disease in the lab. We strongly oppose the import of US chicken meat and meat products to the UK on both animal welfare grounds and on the basis that public health should not be put at risk.
35. 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.

Meeting future demand: immigration system

36. The RCVS Survey of the Profession 2019¹² 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
37. 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

¹¹ 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>

¹² The 2019 Survey of the Veterinary Profession <https://www.rcvs.org.uk/news-and-views/publications/the-2019-survey-of-the-veterinary-profession/>

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. Losing Official Veterinarians (OVs) from slaughterhouses would increase the risk of food fraud, provide the potential for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could jeopardise trade. RCVS data has also previously shown that around a quarter of all vets working in Wales are EU-graduates¹³.

38. 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 have significant consequences for animal health, animal welfare, public health, and trade.
39. On 18 February 2020, the government set out its plans for a new immigration system.¹⁴ 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.
40. 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 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.
41. 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.¹⁵ 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.

Education

42. The UK has taken steps in recent years to expand the number of veterinary undergraduate places.¹⁶ This includes increases to the capacity in a number of existing

¹³ Figures of EU graduated vets currently practicing in Wales provided by the RCVS on 8 February 2017. RCVS, 2015. RCVS Facts. [Online] Available at: <file:///C:/Users/Amyw/Downloads/rcvsfacts2015.pdf> [Accessed 7 June 2017]

¹⁴ Policy paper The UK's points-based immigration system: policy statement Published 19 February 2020

¹⁵ RCVS Facts 2017

¹⁶ RCVS Facts 2017 demonstrates an increase in veterinary undergraduate student numbers from 804 in 2006-2007 to 1011 in 2016-2017.

veterinary schools and the establishment of new veterinary schools and partnerships: University of Surrey School of Veterinary Medicine (which produced its first graduates in 2019), Harper and Keele Veterinary School (first intake in 2020) and the University of Aberystwyth/Royal Veterinary College training hub.

43. There are concerns about how quickly the capacity of UK universities could be further expanded to meet a massively increased demand at short notice. Increasing capacity takes time, money (both initial capital and ongoing revenue), and personnel.
44. The University of Surrey announced plans to open the school of veterinary medicine in October 2012; the first cohort of students will not graduate until 2019. The Surrey veterinary school cost £45 million to establish.
45. At present, it is estimated that the full cost of veterinary education is well in excess of £20,000 per student, per year of study.¹⁷ Despite existing funding mechanisms, the cost of providing undergraduate veterinary education exceeds current direct income streams.¹⁸ Expanding the numbers of UK graduates must be supported by additional Government funding in order to safeguard existing quality and standards in veterinary education.
46. Further, UK students are currently subsidised by the high fees of overseas students; a re-balancing in favour of producing more domestic graduates would therefore jeopardise the funding model of some veterinary schools, requiring more additional funding per UK student place.
47. Furthermore, UK graduates do favour clinical practice over public health roles. A significant cultural change would be required to make public health roles more appealing to UK graduates and reduce the existing reliance on overseas-qualified veterinary surgeons in this area.

Retention of existing workforce

48. Considerable efforts are underway to retain graduates within the profession. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.
49. Together, RCVS and BVA launched the report “Vet Futures – Taking charge of our future”¹⁹ in November 2015. The Vet Futures project aims to improve retention of the existing veterinary workforce by ensuring veterinary professionals are confident, resilient, healthy and well supported, and benefit from exceptional leadership. In July 2016, the Vet Futures Action Plan,²⁰ was launched with a series of actions to make this vision a reality. These actions are ongoing, and a review of the project is underway.

¹⁷ Veterinary Schools Council, 2017. Maintaining excellence and sustainability in UK veterinary education and research post-Brexit <https://www.vetschoolscouncil.ac.uk/wp-content/uploads/2017/05/Veterinary-education-research-post-Brexit-VSC.pdf>

¹⁸ Ibid

¹⁹BVA, RCVS Vet Futures – Taking charge of our future, 2015 <https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>

²⁰ BVA, RCVS Vet Futures Action Plan 2016-2020, 2016 [https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016\(5\).pdf](https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf)

Paraprofessionals

50. Consideration is also being given to how the veterinary team can be reformed to allow paraprofessionals to take on additional tasks, freeing up veterinary time. In response to the expected increase in demand for EHCs, the Animal and Plant Health Agency (APHA) has introduced the new role of Certification Support Officers (CSOs). CSOs work under the direction of the Official Veterinarians responsible for signing export health certificates relating to POAO. The act of certification is still undertaken by a veterinary surgeon. Similarly, Official Auxiliaries work with FSA (and DAERA/FSS) OVs to assist with the delivering official controls in abattoirs.
51. Further reform needs to be undertaken in a measured way that prioritises animal health, animal welfare and public health and does not undermine the role of the veterinary surgeon in diagnosis or the integrity of the veterinary surgeon's signature. This work is being undertaken as part of the RCVS Legislation Review.