

BVA submission to the Department for Business, Energy, and Industrial Strategy white paper: UK Internal Market

Introduction

- 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) We have consulted with our Branches in Northern Ireland, Scotland, and Wales.
- 3) We welcome the opportunity to comment on the BEIS white paper 'UK Internal Market'. As areas of EU competence return to the UK, the way in which this interacts with devolution needs careful consideration. This is particularly pertinent across a number of issues of veterinary interest, including animal health, animal welfare, agriculture, and food safety. Until now, cohesion has been achieved through EU Directives which have allowed limited scope for the four nations of the UK to differ.
- 4) Following the end of the transition period it is essential that there is an efficient and effective mechanism in place to ensure ongoing cooperation and collaboration across the UK in relation to the provision of both goods and services, and disease control, and animal welfare standards. This was recognised in our report 'Brexit and the veterinary profession' published in 2016:

*"Trade and animal movements across the borders of the UK are likely to remain hugely important for the whole UK economy; diseases do not necessarily respect political borders meaning that shared surveillance will continue to be a priority; and it is imperative that animal welfare regulations do not simply export poor welfare to neighbouring countries. For all of these reasons, in a post-Brexit UK we believe that structures should be put in place to ensure ongoing cooperation and collaboration. Our overarching call is therefore for the four parts of the UK to continue to work together for the good of animal health and welfare, and public health."*¹

- 5) Such a mechanism must ensure a degree of parity so as not to disadvantage producers in any particular region at any given time, yet allow sufficient flexibility to progress animal health and welfare, and food safety, and avoid stifling or slowing progress by a requirement to avoid divergence.
- 6) Maintaining cohesion in the UK internal market is important from a veterinary perspective for a range of reasons. Practically it is easier for a vet working on either side of the Wales/England or Scotland/England border to have one set of regulations to comply with. Where there are already examples of divergence, such as approaches to disease control, those differences exist for evidence-based reasons, allowing the devolved administrations to apply control programmes tailored to local circumstances. For example, the existing differences in monitoring and controlling Bovine Tuberculosis across the UK reflect the relative risk of the disease in the different areas, but there are mechanisms to allow movement of cattle across the borders.

¹ <https://www.bva.co.uk/media/3107/brexit-and-veterinary-profession-v10.pdf>

- 7) Furthermore, we would not wish to see the creation of a need for veterinary checks on products of animal origin moving within the UK at a time when the veterinary workforce is already stretched. The veterinary workforce will be further stretched from January 2021 by the requirement for exporters to hold 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. According to the Northern Ireland Protocol, Northern Ireland will remain aligned to a range of EU single market rules, including sanitary rules for veterinary controls, placing an additional administrative and cost burden on producers and increasing the potential for delays.
- 8) In addition, significant concerns remain in relation to the way in which animal health companies will be required to register and maintain authorisations (licences) for veterinary medicines in Northern Ireland. For veterinary medicines with an authorisation for the NI/EU market consideration could be given to the development of a simplified route for veterinary medicines to be authorised throughout the UK without requiring a repeat GB assessment by the UK regulatory authority. Different packaging requirements within the UK, in particular any NI only packaging and labelling requirements would act as a severe disincentive to keeping veterinary medicines on the market, especially in NI. The current lack of clarity, and the likelihood of burdensome NI specific regulatory requirements, as well as concerns about potential severe supply chain disruption, represents a serious risk to the availability and control of veterinary medicines in Northern Ireland, which will have a significant impact on animal health and welfare, and could increase the risk of antimicrobial resistance developing.
- 9) It is essential that unnecessary burdens are not created within the UK and as such we strongly support the principle of mutual recognition, which means that the rules governing the production and sale of goods and services in one part of the UK are recognised as being as good as the rules in any other part of the UK. Such recognition will also be necessary to support frictionless trade with third countries, in relation to the health provenance of animals born in one region of the UK and reared and slaughtered in another, but also more broadly in relation to 'Brand Britain' We also strongly support the principle of nondiscrimination which will prevent one regulatory system introducing rules specifically discriminating against goods or services from another.
- 10) The mechanism for ensuring cohesion must not create the unintended consequence of blocking progress on health and welfare standards and outcomes. For example, those regions wishing to make animal health and welfare improvements through mandating changes to particular production systems must not be disincentivised to do so by the requirement not to discriminate against lower welfare and potentially cheaper products from elsewhere in the UK. While we are concerned that the pace of change could be dictated by the least agile bureaucracy, it should remain possible that increased opportunities for regional autonomy become a driver for improvement as the UK aspires to lead the way in global food production standards.
- 11) We must also continue to recognise and protect the benefits of geographical indications on some products, where those products are valued by consumers at home and abroad. Examples such as Scottish salmon and Welsh lamb represent opportunities to promote high-quality high welfare UK produce to export markets, which Government should look to maximise, as well as seeking to protect and promote local traditional specialities (eg Stilton cheese, Cumberland sausage).
- 12) These challenges have the potential to be overcome by well thought out and effective common frameworks. We welcome the commitment to close working across participating administrations to design policy that benefits all parts of the UK, avoids disruptive divergence, and facilitates innovation in discussion with other administrations, ensuring that new regulations are interoperable. We support the principle of Defra's approach of placing multiple policy areas, which are the subject of returning powers, within the scope of the Animal Health and Welfare Frameworks such that these Frameworks will act as the vehicle for the UK Government and devolved administrations to

collaborate on changes to regulation. However, the Frameworks must not prevent the devolved administrations from developing tailored animal health and welfare programmes, nor stifle the pace of change.