

# BVA response to Public Accounts Committee inquiry on UK Border 2020: preparedness

## 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, animal welfare, public health, regulatory issues and employment matters.
- 2) Veterinary surgeons deploy their expertise across domestic food production, from farm to fork, ensuring UK production meets high standards of animal health, animal welfare and food safety, and providing assurance to trading partners. The veterinary profession has a great deal of expertise that can contribute to the development of the UK's future trade policies and help secure opportunities for the UK economy.
- 3) We welcome the opportunity to provide our evidence to this inquiry on UK Border preparedness ahead of the end of the transition period.

## Introduction

- 4) On 31 January 2020, the United Kingdom left the European Union, and the current "transition period" ends at the end of 2020. The current rules relevant to the UK border, including on trade, travel and business for the UK and EU continue to apply during the transition period, but the government has been preparing for when the UK–EU relationship changes.
- 5) The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. Imports of both animals and animal products may carry pathogens that can represent a threat to public health and the health of animal populations in the UK. Veterinary certification and controls form a vital part of the biosecurity framework for the UK and our trading partners. In the broadest sense, biosecurity can be said to cover every aspect of disease control, prevention and treatment, all of which are areas that rely upon the knowledge and skill of veterinary professionals.
- 6) To facilitate trade, the UK will need enough veterinary surgeons to meet the additional demands for export and import certification and controls that may be required following the end of the transition period. If that requirement is not fulfilled, it could present a significant barrier to trade could be detrimental to the UK farming, food and hospitality sectors.

## Veterinary capacity

- 7) From 1 January 2021, there will be increased demand for veterinary certification and supervision for goods including live animals, products of animal origin (POAO) and germplasm as well as pet animals and equines moving between Great Britain and the EU Single Market and between Great Britain and Northern Ireland. Additional veterinary capacity will be needed to fulfil this demand. The end of the transition period will coincide with necessary Covid-19 restrictions. Capacity concerns are further complicated by the practicalities of following these restrictions.
- 8) 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.<sup>1</sup>

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<sup>1</sup> RCVS Facts 2018 <https://www.rcvs.org.uk/news-and-views/publications/rcvs-facts->

- 9) 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 who will be required to sponsor recruits from outside of the UK. This new immigration system casts significant doubt 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.
- 10) Ensuring capacity to fulfil current work and additional work related to the end of the transition period is essential. There is also a need for capacity that can meet any potential animal disease incursions in the UK. This necessity was underlined on 11 November 2020, an Avian Influenza Prevention Zone (AIPZ) was declared across England Scotland and Wales to mitigate the risk of the disease spreading. The introduction of the AIPZ comes after two separate, unrelated cases in kept poultry and birds and a third case of H5N8 avian flu in captive birds.<sup>2</sup>

### Goods moving from Great Britain to the single market

- 11) 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 Great Britain to the EU Single Market as well as Northern Ireland. The OV stamp and signature attests that relevant public and animal health requirements have been met.
- 12) 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.
- 13) The Animal and Plant Health Agency (APHA) has increased the number of veterinary surgeons with products of animal origin certification panels from approximately 600 in February 2019 to more than 1200, with further funded training announced on 1 October 2020. There has also been the introduction of a Certification Support Officer (CSO) role. These allied professionals work under the direction of an OV, providing support by collecting the evidence required for the OV to complete an EHC. The CSO does not remove the requirement for an OV to sign the EHC.
- 14) Defra estimate an additional 200 Full-Time Equivalent (FTE) OVs will be required to certify export of products of animal origin from Great Britain after the end of the Transition Period.<sup>3</sup> However, we are unaware of the assumptions that have been utilised to reach this estimate. Businesses involved in export certification work, put the number higher requiring at least 350 FTE additional vets.
- 15) Translating an FTE figure into the actual number of OVs needed is complex. This is because many qualified vets operating in the private certification market certify health certificates alongside other veterinary activities. There is a range of OV qualifications tailored to specific types of export (e.g. avian for poultry exports) so it's an over-simplification to focus on total numbers of OVs without a clear understanding of which panels will be most needed. Geography is also an important factor, OVs with the right panels will be needed to the correct localities to meet the need of local industry and transport logistics.
- 16) Where third countries export into the EU, EU Law requires animals and products of animal origin to enter via a designated border control post (BCP) for documentary, identity and physical checks by veterinary surgeons. A veterinary agreement could be reached between the UK and EU,

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2018/?destination=%2Fnews-and-views%2Fpublications%2F%3Ffilter-keyword%3Dfacts%26filter-type%3D%26filter-month%3D%26filter-year%3D

<sup>2</sup> <https://www.gov.uk/government/news/avian-influenza-bird-flu-national-prevention-zone-declared>

<sup>3</sup> Question for Department for Environment, Food and Rural Affairs UIN 96843, tabled on 29 September 2020 <https://questions-statements.parliament.uk/written-questions/detail/2020-09-29/96843>

similar to that between the EU and New Zealand,<sup>4</sup> which could significantly reduce the level of physical checks. However, this would not eliminate all checks or the need for infrastructure.

- 17) The final details of the UK's future relationship with the EU, including the decisions of the joint committee for the operation of the Protocol on Ireland/ Northern Ireland, are unknown. However, it appears likely that these requirements for goods moving from Great Britain to the EU Single Market will apply to goods entering Northern Ireland.

## Goods moving from the Single Market to Great Britain

- 18) No-deal guidance issued by the government<sup>5</sup> provided assurances that imports of live animals and products of animal origin from the EU would not initially be subject to veterinary checks. On 10 February 2020 Michael Gove, the Chancellor of the Duchy of Lancaster, announced that businesses should now prepare for border checks for imports from the EU after the transition period ends.<sup>6</sup>
- 19) 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 associated products will now take place at Great Britain Border Control Posts.
- 20) Under these requirements, live animals or products of animal origin would need to be accompanied by an EHC and vets would be required to carry out checks for all animal products being imported into Great Britain from the EU Single Market. 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 will have sufficient veterinary capacity to meet those for imports as well.
- 21) Where the Great Britain BCPs will be located is still uncertain. In the Border Operating Model, which was updated in October 2020, the government notes "Much of this infrastructure will be located at ports and border locations but where this is demonstrated not to be possible, HMG will provide inland facilities."<sup>7</sup> There is then a list of "intended and potential inland sites." At this stage more certainty is needed. Putting in place this infrastructure and staff will require a significant amount of time and resource.
- 22) Great Britain can learn from the experience neighbouring states who are preparing border Sanitary and Phytosanitary infrastructure and staff to comply with imports from Great Britain. Ireland will be required to have BCPs in place from January. The Irish Government agreed sites and plans in 2018 and were preparing to hire "in the region of 200 extra full-time staff to carry out Sanitary and Phytosanitary Controls (SPS) checks and controls at ports and airports."<sup>8</sup> A sizeable number of this cadre will be OVs, but there will be phytosanitary staff and support staff included in this number. In the Netherlands, there were plans, reported in 2018,<sup>9</sup> for an additional 145 veterinarians for the Port of Rotterdam ahead of a previous potential no deal.
- 23) The National Audit Office report "The UK border: preparedness for the end of the transition period" includes an estimate for the number of staff needed for import checks on animals and

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<sup>4</sup> Council Decision 97/132/EC of 17 December 1996 on the conclusion of the Agreement between the European Community and New Zealand on sanitary measures applicable to trade in live animals and animal products.

<sup>5</sup> Importing animals and animal products if there's no Brexit deal, Updated 19 December 2018 withdrawn on 13 March 2020 <https://www.gov.uk/government/publications/importing-animals-and-animal-products-if-theres-no-brexit-deal/importing-animals-and-animal-products-if-theres-no-brexit-deal>

<sup>6</sup> <https://www.gov.uk/government/news/government-confirms-plans-to-introduce-import-controls>

<sup>7</sup> <https://www.gov.uk/government/publications/the-border-operating-model>

<sup>8</sup> <https://www.thejournal.ie/ireland-customs-veterinary-brexit-4135182-Jul2018/>

<sup>9</sup> <https://www.theguardian.com/business/2018/sep/22/rotterdam-prepared-for-worst-after-brexit>

POAO from July 2021.<sup>10</sup> That figure is 490. It is important to note that this figure will include a sizeable number of veterinary surgeons, as well as other professionals. It is also important to note that this figure will be in addition to the number of OVVs required for export certification work as explained above.

- 24) In Great Britain there are very limited numbers of OVVs that have the required training to function as Portal OVVs. It is likely that Port Authorities will be seeking to source private OVVs from existing certification businesses further reducing the availability of experienced export OVVs in the supply chain.

### Northern Ireland border preparations

- 25) Under the provisions in the Northern Ireland Protocol, exports from NI to the EU will not require EHCs at the end of the transition period. The UK government has indicated that movements of into GB will also continue without any additional certification being required.<sup>11</sup> However, where products move from Northern Ireland to Great Britain for onwards export to the EU, third countries outside the EU, or movement back into NI, either directly or following further processing, the OV in Great Britain will require supporting information from NI OVVs to permit certification of the goods and completion of the relevant EHC.<sup>12</sup> Supplying this supporting information will require veterinary capacity.

- 26) The UK government has indicated that border controls on live animals and POAO will be delayed until July 2021. Therefore, there is time available to put in place the necessary infrastructure and personnel. However, Northern Ireland is required to have an approved BCP in place by 1 January 2021.

- 27) Denis McMahon, the Permanent Secretary of the Northern Ireland Department for Agriculture, Environment and Rural Affairs (DAERA) has noted, referring to delivering border infrastructure:

“Having seven months to deliver all of that has been a monumental challenge. In operational terms, there are a range of issues that, from the beginning, have had the potential to derail the schedule. One example is physical constraints at the sites. Even without those kinds of delays, the deadline was almost impossible to meet.”<sup>13</sup>

- 28) Robert Huey, the Northern Ireland Chief Veterinary Officer also noted:

“The plans that we submitted to the Commission for its approval — everything that we do has to be approved by the Commission as far as facilities, practices and processes are involved — were for around 100 additional inspectors. The implementation of a contingency would require more than that. Let us be clear: although I am recruiting vets and technical officers, all those staff will, initially, have to come from within my own staff resource: I will, initially, have to rob Peter to pay Paul until we get additional staff in. We will bring in some agency staff, of course, to help with that as well, but the majority of the veterinary staff will come from within my staff. They will come off the TB programme and other programmes. That is inevitable.”<sup>14</sup>

- 29) The challenges remaining to ensure an operational BCP in Northern Ireland remain and highlight

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<sup>10</sup> <https://www.nao.org.uk/wp-content/uploads/2020/11/The-UK-border-preparedness-for-the-end-of-the-transition-period.pdf>

<sup>11</sup> <http://apha.defra.gov.uk/external-operations-admin/library/documents/exports/ET197.pdf>

<sup>12</sup> <http://apha.defra.gov.uk/external-operations-admin/library/documents/exports/ET197.pdf>

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<http://aims.niassembly.gov.uk/officialreport/minutesofevidencereport.aspx?AgendaId=23370&evidID=12137>

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<http://aims.niassembly.gov.uk/officialreport/minutesofevidencereport.aspx?AgendaId=23370&evidID=12137>

the challenge ahead for plans in Great Britain.

## Equine movements

- 30)** 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.
- 31)** 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.
- 32)** In order to be considered registered, an equine will need to have its studbook approved by the EU (unless it is registered by an international sporting organisation like the FEI Federation Equestre Internationale).<sup>15</sup> If the studbook has not been approved, the equine will be considered unregistered (and will have to follow the relevant requirements for this category). Weatherbys and other UK studbooks are not currently approved. The UK has applied to the EU for studbook listing but, this has not been granted. Until and unless this changes, any plans should be made on the basis that horses (other than those registered with the FEI) will be considered unregistered.
- 33)** It is uncertain if these requirements will be applied to equine movements between Great Britain and Northern Ireland

## Pet travel

- 34)** Pet travel after the end of the transition period remains a source of significant uncertainty and needs clarification urgently. At present, The Pets Travel Scheme (PETS) is in operation. This means that with a Pet Passport, companion animals (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.
- 35)** Official government guidance<sup>16</sup> 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.
- 36)** 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.

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<sup>15</sup> <https://www.beva.org.uk/Resources-For-Vets-Practices/Clinical-Practice-Guidance/Brexit-Guidance/Movements-of-equines>

<sup>16</sup> <https://www.gov.uk/guidance/pet-travel-to-europe-after-brexit>

- 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.

**37)** 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 if the pet's rabies vaccinations are kept up to date.

**38)** 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 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.

**39)** 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) where they may need to present proof of microchip, rabies vaccination and tapeworm treatment if required.

**40)** It is uncertain how requirements will be applied to movements between Great Britain and Northern Ireland. In fact, the guidance currently offered by the UK government and DAERA are contradictory:

"There will be no significant changes to pet movements between Great Britain and Northern Ireland. They should continue in a very similar way to as they do now. Further guidance will be provided in due course on pet travel to Northern Ireland"<sup>17</sup>

"As Northern Ireland does not have any pet approved routes, all pet animals travelling here must enter the UK through a pet approved route via Great Britain (GB) or the Republic of Ireland (RoI)."<sup>18</sup>

## Veterinary medicines

**41)** Most veterinary medicines available on the UK market are imported from or via the EU. The EU therefore remains a very important part of the supply chain network and is a key trading partner. The predictable supply of products to the UK is dependent on functioning supply chains that are dependent on the Dover:Calais short straits. It must be a priority to ensure the smooth movement of veterinary medicines products from 1st January 2021 onwards.

**42)** Animal health companies have worked very hard on EU exit preparations and contingency planning both in terms of regulatory requirements and their supply chains such as warehousing, stocks and routes. However, if delays around Kent and the short straits become protracted lasting for several weeks to months, then this could potentially eventually cause a supply issue, outside of the animal health industry's control.

<sup>17</sup> <https://www.gov.uk/guidance/pet-travel-to-europe-from-1-january-2021#pet-travel-to-northern-ireland>

<sup>18</sup> <https://www.daera-ni.gov.uk/articles/travelling-pets>