

# BVA assessment of border readiness ahead of the end of the Brexit transition period

## Summary

With only a few weeks to the end of the transition period, the British Veterinary Association has published this assessment of border readiness highlighting a number of significant concerns. In particular, we are concerned that the UK will not have the necessary veterinary capacity to facilitate trade exports and imports, whether the UK secures a trade deal with the EU or not.

In light of the detailed analysis in this report, we are calling on the government to:

1. Clarify how its assessment of the need for 200 FTE Official Veterinarians to deliver export health certificates will be realised across the country and update on plans for urgent recruitment
2. Signal to industry now that it should be recruiting Official Veterinarians to deliver export health certification so that contracts can be signed to secure the necessary workforce
3. Guarantee that veterinary capacity to deliver statutory disease control work (such as TB testing) will not be compromised in order to deliver export health certification
4. Secure listed status for pet travel and equine movements to allow vets and animal owners to prepare and reduce the need for unnecessary paperwork and cost
5. Work with the EU to secure the necessary exemptions to allow diagnostic and research samples from CITES-listed species to move freely between the UK and EU after the transition

At a time when the veterinary profession is facing longstanding workforce shortages, additional capacity issues related to Covid-19, and the ongoing threat posed by exotic diseases such as avian influenza and African Swine Fever, it is essential the government works with the veterinary profession and industry to seek urgent solutions that will facilitate critical animal health and welfare and public health measures.

This report covers: veterinary capacity; goods moving from Great Britain into the Single Market; Goods moving from the Single Market to Great Britain; Northern Ireland border preparations; equine movements; pet travel; CITES species and samples; and veterinary medicines.

## Introduction

- 1) On 31 January 2020, the United Kingdom left the European Union (EU) and entered a “transition period” which ends at the end of 2020. During the transition period, there was no change to the rules relevant to border movements between the UK and EU, including on trade, travel and business. From the end of the transition period, 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.
- 2) International movements of live animals, POAO as well as pet animals and equines pose a risk as these may carry pathogens that can be a threat to public health and the health of animal populations. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants. SPS measures form a vital part the wider biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. In the broadest sense, biosecurity can be said to cover every aspect of disease control, prevention and treatment.
- 3) The vital biosecurity role veterinary surgeons play to facilitate the movement of live animals and POAO across borders is recognised around the world as essential for protecting public health, food safety and animal health and welfare.

- 4) 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 that could be detrimental to the UK farming, food and hospitality sectors.
- 5) Capacity concerns are further complicated by two events that coincide with the end of the transition period. The first of these is the continuing Covid-19 pandemic and the restrictions placed on the operations of the veterinary workforce. The second is the incursion of Avian Influenza (AI) in the UK. 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. There is a need for sufficient veterinary capacity that can meet this and any further potential animal disease incursions in the UK including the threat of African Swine Fever.
- 6) Since the publication of the Brexit and the Veterinary Profession report<sup>1</sup> in May 2017, BVA has raised our concerns about the capacity of the veterinary workforce to meet the demands of EU Exit. Unfortunately, 34 days ahead of the end of the transition period, our concerns remain largely unaddressed by government.

## Veterinary Capacity

- 7) 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 the Migration Advisory Committee review of the Shortage Occupation List (SOL) published in May 2019, this shortage of vets was recognised, and vets were reinstated to the SOL.<sup>2</sup>
- 8) The RCVS Survey of the Profession 2019<sup>3</sup> 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
- 9) 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.<sup>4</sup> Latest RCVS data, shared with BVA, suggests the number of new registrations from EEA qualified veterinary surgeons was sustained through 2018 and 2019. However, there has been a significant downturn in registrations during the period of covid-19 restrictions in 2020.
- 10) 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.<sup>5</sup> Losing these veterinary surgeons 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.
- 11) Free movement of people has had an enormous impact on our veterinary workforce. Any

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

<sup>2</sup> <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

<sup>3</sup> The 2019 Survey of the Veterinary Profession <https://www.rcvs.org.uk/news-and-views/publications/the-2019-survey-of-the-veterinary-profession/>

<sup>4</sup> RCVS Facts 2018 <https://www.rcvs.org.uk/news-and-views/publications/rcvs-facts-2018/?destination=%2Fnews-and-views%2Fpublications%2F%3Ffilter-keyword%3Dfacts%26filter-type%3D%26filter-month%3D%26filter-year%3D>

<sup>5</sup> <https://hansard.parliament.uk/Commons/2018-04-18/debates/A9180FFC-F1EC-45A0-AF34-F09345EC2827/LeavingTheEUVeterinaryProfessionInWales>

additional barriers to the movement of EEA-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.

- 12)** In February 2020 the UK 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 there are already constraints on the recruitment and retention of veterinary surgeons.

## Goods moving from Great Britain to the single market

### Third country listing

- 13)** A prerequisite for the movement of any live animals, POAO or germplasm from Great Britain to the EU Single Market as well as Northern Ireland, is that the UK receives a third country listing from the EU Commission. The committee responsible for this listing is the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF). It is expected that the dates for the meeting where a decision can be taken is 14 and 15 December.<sup>6</sup> At this meeting, SCoPAFF will assess the UK's submission that outlines its animal health status and biosecurity assurances.
- 14)** Based on that listing, it will be known what specific animal and public health assurances Great Britain exporters will be required to provide the EU with each consignment of live animals or POAO for the EU to maintain its biosecurity. That assurance is documented within an Export Health Certificate (EHC) and certified by the signature of an Official Veterinarian (OV).<sup>7</sup> An OV is a veterinary surgeon, either employed by the state or in private practice, who performs work, usually of a statutory nature, on behalf of the state. In Great Britain the majority of export health certification is carried out by veterinary surgeons in private practice.
- 15)** Harmonised EU EHCs establish the generic animal health and food safety requirements for products of animal origin exported to the EU. These generic documents include clauses that may or may not be applicable to UK exports, depending on the listing granted by the EU.
- 16)** It is essential that the UK secures a listing that removes the need for EHC clauses which would require processes that are unnecessary from an animal health perspective and would further stretch veterinary capacity. Each of the below are found within harmonised EU EHCs, if any of these were required it would create a significant draw on veterinary capacity. The probability of Great Britain exporters being asked to certify each of the below varies, based on the health status of the UK.<sup>8</sup>
- A 40-day standstill on the last holding before slaughter for bovine and sheep EHCs
  - A negative bovine Tuberculosis (bTB) test within 3 months of slaughter for bovines
  - The systematic trichinella testing of pigs
- 17)** Currently Notes For Guidance (NFG) suggest that the 40-day standstill requirement will not apply and EHCs may be certified on the basis of clearance for Notifiable Diseases. However, until the UK is formally listed and we have the final SCoPAFF position on the Supplementary Guarantee relating to Foot and Mouth Disease, and therefore any residency requirements, the UK Government is unable to provide a guarantee to industry that the 40 day residency sub-clause will not be in place.
- 18)** No other third country currently trading into the EU currently has a 3-month bTB test requirement applied to them. However, it is important to recognise that there are large areas of the UK where

<sup>6</sup> [https://ec.europa.eu/food/sites/food/files/plant/docs/planning\\_sc\\_meetings\\_2020.pdf](https://ec.europa.eu/food/sites/food/files/plant/docs/planning_sc_meetings_2020.pdf)

<sup>7</sup> In the case of fish this certification can be undertaken by a local authority Environmental Health Officer

<sup>8</sup> Veterinary Public Health Agency, (2020) Export Certification and the challenges facing the meat and livestock sector post-transition

bTB is endemic in the cattle population. Scotland has been recognised by the EU as Officially Tuberculosis Free (OTF) since September 2009. Again, until the UK is formally listed the UK Government is unable to provide a guarantee to industry that this requirement will not be in place.

- 19) A large proportion of UK pork production involves some period of outdoor rearing which has been promoted on welfare grounds. However, the sub-clause in the EHC for swine requires the animals to have been derived from officially recognised controlled housing which does not permit this outside rearing. If this definition is not met, then either *Trichinella* testing or freezing must be applied. Freezing is not logistically physically possible for the volume that would be required; therefore, the pork industry would have to test carcasses if this sub-clause remained. There are no Supplementary Guarantees against trichinella testing in the Porcine EHC and therefore the UK will be required to test.
- 20) *Trichinella* testing of all pig carcasses would be very time consuming for the veterinary profession, difficult to manage the necessary volumes and expensive for industry at around £1 per carcass. This would also present an opportunity cost, as resource to tackle significant pig health concerns, such as porcine reproductive and respiratory syndrome (PRRS), may be diverted to testing for a disease that is low risk in the UK.

### Export health certification

- 21) From January 2021, exporters will require an EHC signed by an OV to transport live animals, POAO 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.
- 22) The consignments will then need to travel alongside this certificate where they will enter the Single Market 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, 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 requirement for EHCs.
- 23) 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 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.
- 24) The work of the joint committee for the operation of the Protocol on Ireland/ Northern Ireland is still ongoing. 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.

### Meeting the demand for EHCs

- 25) In Great Britain most export certification work is undertaken by veterinary surgeons in private practice. Exporters who plan on moving live animals or POAO from 1 January 2021, should have made contact with veterinary businesses which are able to provide the service of signing EHCs. This is a necessary step to ensure capacity is available where and when it will be needed. This would allow those veterinary businesses to prepare by hiring OVs and support staff, investing in systems, and undertaking additional training.
- 26) To support the preparations of these businesses, government has provided free training<sup>9</sup> that has helped to increase the number of veterinary surgeons in Great Britain with products of animal origin certification panels from approximately 600 in February 2019 to more than 1200. 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.
- 27) Defra estimates an additional 200 Full-Time Equivalent (FTE) OVs will be required to certify

<sup>9</sup> <https://www.gov.uk/government/news/training-fund-launched-to-help-vets-prepare-for-1-january-2021>

exports of products of animal origin from Great Britain after the end of the Transition Period.<sup>10</sup> Businesses involved in export certification work, put the number higher requiring at least 350 FTE additional vets.<sup>11</sup> Our understanding of the Defra figure is that this is a midpoint estimate based largely on existing trade patterns between Great Britain and the EU. Consequently, there is scope for a greater requirement for OV capacity within the ranges of supply and demand assumed within the Defra analysis. An additional risk, not taken into consideration in the Defra analysis, is there will likely be some disruption, at least initially, as businesses and OVs respond to the practicalities of providing EHCs on this new scale.

- 28)** 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.
- 29)** The 200 FTE figure only provides the number of OVs that may be required for final export certification. However, there is uncertainty about the certification of sub-clauses in the EHCs. The UK may seek an equivalence agreement to allow these sub-clauses to be signed by the export OV based of national Notes For Guidance (NFG's) only. If this agreement is not secured, complex certification and support documentation by OVs may be required along the supply chain from farm to slaughter. Veterinary capacity and training would need to be put in place to meet this requirement.

### Contingency planning

- 30)** The Defra Secretary of State, George Eustice MP, has indicated that in the event of gaps in capacity, state veterinary workforce could be deployed to undertake export work:

“In addition to that, as a belt-and-braces approach, we are also designing contingency plans with our agencies, like APHA, so that if push came to shove, and there was a gap in capacity, we could come in with the state veterinary service to help complement what those private vets are doing.”<sup>12</sup>

- 31)** Welsh Rural Affairs Minister Lesley Griffiths was asked about this issue in a session of the Senedd's Climate Change, Environment and Rural Affairs Committee:<sup>13</sup>

“So, my TB testing will be impacted,’ or the current situation with avian flu, we will just have to take vets off that sort of work.”

- 32)** To which the Chief veterinary officer (CVO) for Wales, Christiane Glossop, who was also giving evidence to the committee, noted:

“It is really unsatisfactory.”

- 33)** We share these concerns about the continuation of the vital work of the state veterinary service including disease surveillance, bTB testing and responding to incursions of exotic disease. The use of this contingency must be severely time-limited to ensure the adverse effects of minimal

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<sup>10</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>

<sup>11</sup> Industry assessment provided at “Export Certification and the challenges facing the meat and livestock sector post-transition” event organised by the Veterinary Public Health Association and chaired by former UK Chief Veterinary Officer Nigel Gibbens. 24 September 2020.

<sup>12</sup> House of Commons Environment, Food and Rural Affairs Committee, Oral evidence: The work of Defra (HC261),

22 September 2020, <https://committees.parliament.uk/oralevidence/911/pdf>

<sup>13</sup> <https://www.fginsight.com/news/welsh-vets-responsible-for-tb-testing-face-move-to-ports-to-deal-with-brex-it-issues-114629>



state veterinary capacity on animal health, animal welfare and public health is limited.

### The Groupage Export Facilitation Scheme (GEFS)

- 34)** The Groupage Export Facilitation Scheme (GEFS) has been established by Defra to facilitate the movement of POAO from Great Britain to, or for transit through, the EU, as well as the movement of goods from Great Britain to Northern Ireland.<sup>14</sup> The scheme allows exporters to make use of 30-day Support Attestations from their suppliers in the UK. These attestations can be used to facilitate the provision of information to OV's who can sign EHCs based on this information.
- 35)** This scheme is open to specific categories of products which are produced by a stable network of known suppliers. It is hoped that this will reduce the demands on OV time. 30-day Support Attestations may be used for composite products, meat products, meat preparations and dairy products for human consumption as well as processed pet food. Attestations cannot be used for fresh meat, raw milk, POAO not for human consumption (except processed pet food), live animals, germinal products.

### Goods moving from the Single Market to Great Britain

- 36)** No-deal guidance issued by the government<sup>15</sup> in 2018 provided assurances that imports of live animals and products of animal origin from the EU would not initially be subject to veterinary checks. But 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>16</sup>
- 37)** 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.
- 38)** 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.
- 39)** Where the Great Britain Border Control Posts (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>17</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.
- 40)** Great Britain can learn from the experience of 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>18</sup> A sizeable number of this cadre will be OV's, but there will be phytosanitary staff and support staff

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<sup>14</sup> <http://apha.defra.gov.uk/external-operations-admin/library/documents/exports/ET193.pdf>

<sup>15</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-brexid-deal/importing-animals-and-animal-products-if-theres-no-brexid-deal>

<sup>16</sup> <https://www.gov.uk/government/news/government-confirms-plans-to-introduce-import-controls>

<sup>17</sup> <https://www.gov.uk/government/publications/the-border-operating-model>

<sup>18</sup> <https://www.thejournal.ie/ireland-customs-veterinary-brexid-4135182-Jul2018/>

included in this number. In the Netherlands, there were plans, reported in 2018,<sup>19</sup> for an additional 145 veterinarians for the Port of Rotterdam ahead of a previous potential no deal.

- 41) 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 POAO from July 2021.<sup>20</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 OV’s required for export certification work as explained above.
- 42) In Great Britain there are very limited numbers of OV’s that have the required training to function as Portal OV’s. It is likely that Port Authorities will be seeking to source private OV’s from existing certification businesses further reducing the availability of experienced export OV’s in the supply chain.

### Northern Ireland border preparations

- 43) 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 live animals and POAO into GB will also continue without any additional certification being required.<sup>21</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 OV’s to permit certification of the goods and completion of the relevant EHC.<sup>22</sup> Supplying this supporting information will require veterinary capacity.
- 44) 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.
- 45) Denis McMahon, the Permanent Secretary of the Northern Ireland Department for Agriculture, Environment and Rural Affairs (DAERA) has noted (September 2020), 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>23</sup>

- 46) 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

<sup>19</sup> <https://www.theguardian.com/business/2018/sep/22/rotterdam-prepared-for-worst-after-brexit>

<sup>20</sup> <https://www.nao.org.uk/wp-content/uploads/2020/11/The-UK-border-preparedness-for-the-end-of-the-transition-period.pdf>

<sup>21</sup> <http://apha.defra.gov.uk/external-operations-admin/library/documents/exports/ET197.pdf>

<sup>22</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>

inevitable.”<sup>24</sup>

- 47) The challenges remaining to ensure an operational BCP in Northern Ireland remain and highlight the challenge ahead for plans in Great Britain.

## Equine movements

- 48) 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.
- 49) 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.
- 50) 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>25</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.
- 51) It is uncertain if these requirements will be applied to equine movements between Great Britain and Northern Ireland

## Pet travel

- 52) 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 across the Ireland land border. However, in practice, there is a risk-based pragmatic approach taken, meaning the requirement for a Pet Passport has often not been enforced.
- 53) Official government guidance<sup>26</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.
- 54) 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.

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<sup>24</sup>

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

<sup>25</sup> <https://www.beva.org.uk/Resources-For-Vets-Practices/Clinical-Practice-Guidance/Brexit-Guidance/Movements-of-equines>

<sup>26</sup> <https://www.gov.uk/guidance/pet-travel-to-europe-after-brexit>



- Their pet must have a blood sample taken at least 30 days after its primary rabies vaccination (from a current series of vaccinations). 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.
- Owners must take their pet to the vet no more than 10 days before travel to get an AHC which will be valid for 10 days of issue for entry into the EU. Pets will need a new health certificate for each trip to the EU.

**55)** 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.

**56)** 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.

**57)** 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.

**58)** 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>27</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>28</sup>

## CITES species and samples

**59)** There is uncertainty about the movement of diagnostic samples from CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) listed species between the UK and EU at the conclusion of the transition period.

**60)** CITES is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival. Global trade and movement of endangered animals or plants, or their products (for example skin, fur, teeth, shell,

<sup>27</sup> <https://www.gov.uk/guidance/pet-travel-to-europe-from-1-january-2021#pet-travel-to-northern-ireland>

<sup>28</sup> <https://www.daera-ni.gov.uk/articles/travelling-pets>

feathers, blood or seeds) is controlled under the convention.

- 61) At the end of the current transition period, species and their products that are currently freely moved and traded between the UK and the EU would require a CITES permit or import/export notification. This is because the UK will fall outside of the EU regime which removes requirements for paperwork for movements within the EU. This would mean movement of all species and their products controlled under CITES between the UK and the EU would need to follow the same processes as those currently in place for movement between the UK and non-EU countries.
- 62) Clinical samples taken for the purpose of diagnosis fall under the auspices of the convention. Veterinary surgeons in the UK send these clinical specimens to reference laboratories for investigation to aid diagnosis and determine best treatment. These laboratories may be situated within the UK or in the EU. Often a diagnostic company will operate across both jurisdictions and may move samples between laboratories in both the UK and EU. It is important to note that this process moves in two directions, with clinical samples taken by EU veterinary surgeons shipped to laboratories in the UK.
- 63) Until the end of the transition period, UK clinical samples can be sent to laboratories in the EU without any accompanying paperwork. From January 2021, all diagnostic samples taken from any CITES listed animal will need appropriate paperwork. It is our understanding that Northern Ireland will remain within the EU CITES territory. Consequently, movements of diagnostic samples from Northern Ireland to a referral laboratory in Great Britain, and vice versa, would be illegal without the required permission.
- 64) Applying for a permit can take many days before being granted. It will be the responsibility of both the UK veterinary surgeon sending the sample and the diagnostic company receiving the sample in the EU to apply for CITES paperwork. In this time many samples will have perished. For those samples that survive, the severe delays will make diagnoses in clinical cases impossible. This will have devastating consequences for the health and welfare of the animals affected. Samples from CITES listed species that are utilised for research will be equally impacted.
- 65) This will have an enormous effect on the health and welfare of wild animals kept as part of zoological collections. Furthermore, many of the species affected are very common, including many species of tortoises and parrots which may be kept as pets and may be under the care of their local veterinary practitioner. In order to safeguard the health and welfare of endangered wildlife, we are asking the Government to work with the EU to secure an exemption from the requirement for permits where samples are moving for the purposes of veterinary diagnosis.

## Veterinary medicines

- 66) 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 medicinal products from 1st January 2021 onwards.
- 67) 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.
- 68) There are concerns about the availability of veterinary medicines in Northern Ireland. Often medicines are shipped from the EU and warehoused in Great Britain. They are then moved in smaller quantities to Northern Ireland. Trade friction in the Irish Sea could make this difficult. For example, there could be a requirement for batch testing once medicines enter Northern Ireland from Great Britain. The Ireland/Northern Ireland Specialised Committee readout on 5 November included the below information which indicates any regulatory controls will be delayed:

“The Committee noted that an agreed approach had been reached on a phased process for implementing medicines regulation in Northern Ireland up to 31 December 2021, providing the additional time needed for businesses to prepare in relation to batch testing, importation and Falsified Medicines Directive requirements.”<sup>29</sup>

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<sup>29</sup> <https://www.gov.uk/government/news/irelandnorthern-ireland-specialised-committee-05-november-2020>