

BVA response to EU Goods Sub-Committee Future UK-EU relations: trade in goods inquiry

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) We welcome the opportunity to provide our evidence to this inquiry on Future UK-EU relations and the issue of veterinary capacity to meet the requirements of those relations.
- 3) Imports of both animals and animal products may carry pathogens that can represent a threat to UK 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 of the UK's 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, all of which are areas that rely upon the knowledge and skill of veterinary professionals.
- 4) The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. Veterinary certification and controls form a vital part of the biosecurity framework for the UK and our trading partners.
- 5) 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.

The Trade and Cooperation Agreement

- 6) The Withdrawal Agreement concluded between the EU and UK on 17 October 2019 formalised the position that Great Britain would be leaving the EU Single Market, as well as the unique position of Northern Ireland within the Single Market for agri-food products and live animals. Leaving the Single Market means exporters will require an Export Health Certificate (EHC) to transport animals and Products of Animal Origin (POAO) from Great Britain to the EU Single Market and Northern Ireland. There is also the requirement for additional certifications for pet travel and equine movements.
- 7) Unlike a normal free trade agreement, any deal reached between the UK and EU was going to manage additional trade friction, not seek to reduce it. There was hope that the Trade and Cooperation Agreement (TCA) would in some way make that additional trade friction less burdensome, reduce bureaucracy and limit the level of controls that would be required. However, the TCA Sanitary and Phytosanitary SPS chapter provides very little in this regard.
- 8) Within the structures created by the TCA, there will be a "Trade Specialised Committee on Sanitary and Phytosanitary Measures" where the UK and EU can meet and discuss the operation of SPS arrangements and potentially seek further facilitations without compromising biosecurity. It is imperative that the UK government engages industry and the veterinary profession to understand the practical experience of meeting the demands of exporting SPS goods and to work together to identify potential solutions to bring to this specialised committee.
- 9) We welcome the provisions for cooperation on antimicrobial resistance (AMR), animal welfare, and sustainable farming. However, it should be noted that the TCA says, "The Parties recognise that animals are sentient beings." At present this is no longer the case in the UK and should be

rectified with legislation as a matter of urgency as BVA has urged government to do for some time.

Veterinary involvement in trade

- 10) From 1 January 2021, there has been an increased demand for veterinary certification and supervision for goods including live animals, 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.

Exports

- 11) Exporters 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 (unless exempt during the current grace period). The OV stamp and signature attests that relevant public and animal health requirements have been met. 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.
- 12) Additional veterinary capacity will be needed to fulfil this demand. It is still too early to tell if the UK has sufficient veterinary capacity at present to do this. Many operators are still waiting and delaying some of their exports. Thus far, veterinary capacity has not yet been a barrier and we welcome the work that has been done by government to increase that capacity.
- 13) Our understanding from discussions with the UK government, EU contacts and industry is that during the month of January exports have been well below the level that would typically be expected. Engagement with French authorities has provided that in the first few days of January, traffic in the GB-France direction was only 30% of its usual amount, and it is at approximately 60% as of 14 January 2021. However a large percentage of the lorries were arriving in France empty. The proportion of batches that require SPS checks is around 5%, compared to 10% in usual times.
- 14) Further demands for additional veterinary capacity in Great Britain to sign EHCs are expected. The current grace period that is in place for movements from Great Britain to Northern Ireland that removes the requirements for the majority of EHCs will come to an end on 1 April 2021. It is also known that new EU EHCs will need to be operational by 21 April 2021. These new EHCs will also increase the demand for EHCs as they will remove an exemption currently in place for certain shelf stable composite goods.

Imports

- 15) There will also be the need for OVs to perform import checks once sanitary controls are applied on imports into Great Britain from the EU. 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 at Great Britain Border Control Posts.
- 16) 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.”¹ 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.
- 17) 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

¹ <https://www.gov.uk/government/publications/the-border-operating-model>

Sanitary and Phytosanitary Controls (SPS) checks and controls at ports and airports.”² 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, for an additional 145 veterinarians for the Port of Rotterdam ahead of a previous potential no deal.³

- 18)** Recently, the government announced £14 million in funding has been given to local authorities across England to help them maintain the UK’s high standards on imported animal products. “Over 500 new port health roles are being created to facilitate the new checks on imports of animal products from the EU from April 2021.”⁴ Not all of this reported 500 personnel will need to be qualified official veterinarians (OVs), but it is likely that a significant number will be OVs.
- 19)** In Great Britain there are very limited numbers of OVs that have the required training to function as Portal OVs. It is likely that Port Authorities will be seeking to source private OVs from existing certification businesses further reducing the availability of experienced export OVs in the supply chain.

Increasing veterinary capacity

- 20)** At this stage, a month after the end of the transition period, there are material uncertainties and limitations on knowing what the exact increase in control and 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.
- 21)** Translating EHCs into veterinary workforce demand is complex. Defra estimated an additional 200 Full-Time Equivalent (FTE) OVs will be required to certify export of POAO from Great Britain.⁵ Businesses involved in export certification work, put the number higher requiring at least 350 FTE additional vets. Translating an FTE figure into the actual number of OVs needed is a further complexity. 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 oversimplification 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.
- 22)** 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 at the end of the transition period. 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.
- 23)** Government has put in place surge capacity to meet demand in the short term. Provision has been put in place for APHA vets to be taken off front line work and utilised to fill gaps in provision when this is needed. APHA has also trained a number of new export locums to meet demand without moving frontline staff off other work. This dedicated locum capacity is particularly welcome. APHA veterinary capacity is an important resource that is needed to meet animal disease incursions in the UK, which could limit that ability for that resource to be released. This necessity was underlined on 11 November 2020, when an Avian Influenza Prevention Zone (AIPZ) was declared across England Scotland and Wales to mitigate the risk of the disease spreading.

² <https://www.thejournal.ie/ireland-customs-veterinary-brexit-4135182-Jul2018/>

³ <https://www.theguardian.com/business/2018/sep/22/rotterdam-prepared-for-worst-after-brex>

⁴ <https://www.gov.uk/government/publications/port-health-transition-fund>

⁵ 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>

Immigration

24) The UK is highly reliant on EU vets. According to the Royal College of Veterinary Surgeons (RCVS), on 19 January 2020, there were 27,324 UK practising vets. Of these, 7,936 graduated in the EU (29% of the total). In recent years, more veterinary surgeons who registered in the UK qualified in the EU than in the UK. However, between 2019 and 2020, EU registrations dropped by 35%. This has largely been because of Covid 19 and restrictions on travel. Last ten years of annual registration data below:

Registration Year	UK	EU	ROW	Total
2011	818	472	174	1464
2012	807	573	150	1530
2013	792	664	145	1601
2014	815	713	143	1671
2015	909	981	203	2093
2016	911	973	178	2062
2017	867	963	200	2030
2018	885	1197	218	2300
2019	987	1137	225	2349
2020	1075	741	132	1948

25) The FSA estimates 95% of the veterinary workforce in abattoirs graduated overseas – with the clear majority of these coming from the EU. 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.

26) Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EU-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.

27) In February 2020 the government set out its plans for a new immigration system. Free movement has now ended as has the automatic registration of EEA qualified vets by the Royal College of Veterinary Surgeons as part of the Mutual Recognition of Professional Qualifications (MRPQ). In place of free movement is 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.

Ensuring EHCs are accepted consistently

28) The EHC that has been signed by an OV to transport live animals, POAO or germplasm from Great Britain to the EU Single Market will enter the Single Market via a designated border control post (BCP) for documentary, identity and physical checks by veterinary surgeons. Efforts have been undertaken by government and certifying vets to ensure UK EHCs are accepted consistently across EU BCPs and the movement of goods continues.

29) Senior Defra and APHA staff have attended daily meetings with OVs to determine capacity issues and identify any concerns regarding EHCs. These concerns are then raised by

government with individual BCPs, the EU Commission to ensure consistency. As appropriate the guidance to OVs is updated to ensure the advice to exporters is correct. This process has worked well to date. However, there remain significant problems with the completion of EHCs, both in interpreting the requirements and with inconsistencies in interpretation and implementation at BCPs.