

BVA response to EFRA Committee Call for Evidence: Import check readiness

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 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. Veterinary surgeons both certify and supervise the import and export of animals and animal products. The vital role of veterinary surgeons in trade, protecting public health, food safety, animal health and animal welfare is recognised around the world.
3. We welcome the opportunity to provide evidence to the Committee on this issue which is important to our profession.

Has the introduction of import pre-notification for Sanitary and Phytosanitary (SPS) goods from EU Member States (except the Republic of Ireland) on 1 January 2022 gone smoothly? How has the Government responded to concerns raised by businesses since their introduction?

4. Since 1 January 2022, businesses importing products of animal origin (POAO), animal by-products (ABP) and high-risk foods not of animal origin (HRFNAO) have been required to pre-notify consignments at least four hours in advance of arriving in Great Britain from the EU excluding Ireland.
5. Since January 2021, this requirement had already been in place for live animals, POAO under safeguard measures and high priority plants and plant products.
6. From a veterinary perspective, the purpose of pre-notification is to support the staff at BCPs to ensure they have appropriate capacity in place. We are aware from the experience of veterinary surgeons operating points of entry in Northern Ireland, that pre-notification has been important for DAERA staff to prepare for controls on consignments from Great Britain.
7. Defra told the Public Accounts Committee (PAC)¹ that it had learned from experience of checks being introduced by the EU and that starting with pre-notification before introducing checks means that people would have to get used to using the IPAFFS system. However, Defra would not start checking until July. Therefore, the intention appears to be about building compliance, as well as an evidence base to understand the demands for checks when these are introduced from July 2022.

Was the Government right to delay on four occasions the introduction of import checks and controls? How well has it managed and communicated those delays?

8. We are aware that in March 2021, the UK Government announced its intention to reset the timetable for the phased introduction of controls on imports from the EU into Great Britain from October 2021.
9. Ahead of this announcement there was no consultation with the veterinary profession to understand what the impact of this change would be on animal health or how this

¹ <https://committees.parliament.uk/publications/8781/documents/88926/default/>

would affect preparations for sanitary controls in Great Britain. Consequently, no assurances were provided that all relevant biosecurity risks had been assessed and managed.

10. At the time BVA responded with the following statement:

“While these changes may provide some welcome breathing space for industry, they are being introduced at a late stage when vets have been working hard to make preparations for a new raft of requirements being introduced in only three weeks’ time.

“At a time when there are ongoing concerns about veterinary capacity, the sector really needs as much notice as possible to adjust to new demands and shifting timetables. It’s essential that we now use this additional time to put clear plans in place.

“We are also seeking reassurances that delays to import checks will not impact on our ability to protect the UK from disease incursion. These checks form a line of defence to help protect against diseases not currently present in the UK, such as African Swine Fever. This is particularly important as the UK currently does not have access to the range of EU disease surveillance and cooperation systems.”²

- 11.** On 14 September 2021, a Parliamentary Statement was released announcing further delays to border checks that were due to begin to be phased in from 1 October.³ As in March 2021, there has been no consultation with the veterinary profession and no assurances have been provided by Government that all relevant biosecurity risks associated with this delay have been assessed and managed. This is disappointing as the changes made to the timetable were solely related to Sanitary and Phytosanitary (SPS) measures.
- 12.** It is notable that the announcement came just 17 days ahead of the anticipated introduction of border controls on 1 October 2021. UK businesses, port operators, UK and devolved government departments and their agencies were all forced to rearrange plans based on the newly announced timetable for import controls. Furthermore, preparations in EU member states had also been based on the previous date.
- 13.** The UK is now outside EU animal disease surveillance and cooperation mechanisms. As members of the EU, the UK benefited from systems that monitor new and emerging disease through data collection, analysis and sharing across species.
- 14.** The UK will continue to have access to the OIE International surveillance system and alerts through the World Animal Health Information System (WAHIS), an internet-based computer system that processes data on animal diseases in real-time and then informs the international community. The EU Animal Disease Notification System (ADNS) is quicker and more detailed than WAHIS, but only reports incursions and outbreaks in member countries. When the UK Chief Veterinary Officer (CVO), Christine Middlemiss, gave evidence to the EFRA Committee she noted that the WAHIS system was slower by “approximately 24 hours”.⁴
- 15.** In the absence of border controls, and access to EU animal disease systems, there is an increased responsibility on the UK CVO to manage relationships with her counterparts in EU member states and the Commission to identify and manage risks

² <https://www.bva.co.uk/news-and-blog/news-article/vets-react-as-government-shifts-timetable-for-import-checks/>

³ <https://questions-statements.parliament.uk/written-statements/detail/2021-09-14/hcws285>

⁴ <https://committees.parliament.uk/oralevidence/2311/html/>

quickly. We trust her professional judgement as a veterinary surgeon to undertake this role. However, we do not believe this is a long-term solution to managing animal health risk.

16. Import checks form a line of defence to help protect against diseases not currently present in the UK, such as African Swine Fever. Therefore, we should not see a further delay in the introduction of these basic biosecurity and food safety measures. Going forward, there needs to be greater planning and engagement with the veterinary profession to ensure capacity is in place to meet the requirements.

How prepared are British food and farming sector businesses, border posts and the Government for the introduction of further checks from 1 July 2022? What will be the impact of these extra checks?

17. We are mindful that the delivery of border controls is a devolved matter, therefore the below points are relevant for the Welsh and Scottish Governments as well as Defra.

Veterinary capacity

18. Our profession has faced a triple whammy of Brexit, Covid, and the boom in pet ownership, which have put unprecedented pressure on veterinary services across the country. How the UK will find the required veterinary capacity to fulfil increasing demands is unknown.
19. The UK will require a veterinary workforce with the capability and capacity necessary to facilitate international trade both with the EU and other trade partners. To continue to trade, the UK must have enough appropriately trained Official Veterinarians (OV) to meet the additional demands for exports and imports. If that requirement is not fulfilled, it will present a significant barrier to trade and limit any opportunities for the farming and food sectors.
20. There will be a need for enough OVs to perform sanitary controls as these are phased in for imports into Great Britain from the EU. As yet, we have not seen a government workforce analysis that estimates the total number of OVs, or full-time equivalents, that will be needed to undertake this work.
21. We can learn from the recent experience of the EU. The Irish Government was preparing “in the region of 200 extra full-time staff to carry out Sanitary and Phytosanitary Controls (SPS) checks and controls at ports and airports.”⁵ 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.⁶ Despite these plans, in August 2021 there was a four-day delay for British meat shipments to the port of Rotterdam due to a lack of OVs.⁷
22. In January 2021, Defra provided £14 million in England to support recruitment and training of over 500 new staff, including OVs.⁸ These OVs will be employed by public health authorities (PHAs), either directly or indirectly, or by the Animal and Plant Health Agency (APHA).
23. The UK is highly reliant on EU vets. Yet, as the demands on veterinary capacity have increased, there has been a constraint on new veterinary surgeons entering the UK from the EU. It is vital to consider the impact of meeting these additional demands without a corresponding increase in the number of veterinary surgeons in the UK.

⁵ <https://www.thejournal.ie/ireland-customs-veterinary-brexit-4135182-Jul2018/>

⁶ <https://www.theguardian.com/business/2018/sep/22/rotterdam-prepared-for-worst-after-brex>

⁷ <https://www.euromeatnews.com/Article-Lack-of-vets-delays-British-meat-exports-to-the-EU/4848>

⁸ <https://www.gov.uk/government/news/funding-for-new-checks-on-animal-products-creates-500-jobs>

Providing a workforce to deliver these new requirements may mean pulling vets away from other essential activities.

24. The operation of veterinary functions must become more efficient, and the use of allied professionals will be vital to achieving that aim. Consideration is 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, APHA introduced the new role of CSOs to support export certification. Based on this experience, there is scope to explore the utilisation of new categories of allied professionals to support the work of import control OVVs, as part of a vet-led team.
25. Further reforms need to be undertaken in a measured way that prioritises animal health, animal welfare and public health and does not undermine the integrity of the veterinary surgeon's signature.

Training

26. It is our understanding that Defra will be responsible for training the new portal OVVs in England. That training will be more extensive than the training required for EHC OVVs.
27. In the past, training for portal OVVs was normally provided on two days per calendar year. Considering how capacity is likely to be ramped up to meet demand ahead of July 2022, and likely as demand increases as controls are expanded, this previous model will no longer work.
28. We would welcome a clear timetable, from Defra and the Scottish and Welsh Governments, on how training is being developed, quality assured and delivered.

Infrastructure

29. BCPs are currently being constructed in Great Britain. On Friday 2 October 2020 the government launched a £200 million fund for ports to bid on to build new facilities. Reporting from the Financial Times has noted concerns from port operators that this funding may be inadequate in practice.⁹
30. Before becoming operational these BCPs will need to be inspected and approved by APHA, as the relevant competent authority. These BCPs will need to be designated for specific types of consignment and have appropriate facilities and staff to meet the standards expected for the specific designation
31. Involving the veterinary profession in the design of new facilities will be sensible. Veterinary knowledge of animal welfare and animal handling will provide a vital underpinning to the development of appropriate facilities to inspect and hold live animals, including equines.
32. Government should ensure that BCPs designated for live animals are located in appropriate locations to ensure there is not an incentive for longer journeys than necessary.
33. According to the most recent Border Operating Model,¹⁰ there is no stated date for when checks on live animals will begin at BCPs. Identity and physical inspections of live animals will only move to designated BCPs as facilities become available. Where there is no designated BCP, checks will remain at point of destination. Live animals pose the greatest animal health risk. This is why physical checks are performed on 100% of live animal imports under the risk-based framework of the Official Controls Regulations. Delaying physical Checks at destination poses an increased risk of

⁹ Financial Times, Building of Brexit border posts faces delays, Peter Foster, January 25 2021
<https://www.ft.com/content/82dab12c-380a-450b-b7f7-c47a56102c66>

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1041528/2021_December_BordersOPModel.pdf

disease spread when compared to checks at BCPs. Government should provide a firm timetable for live animal checks at BCPs.

34. Further to the development of BCPs, there will also need to be completion of supporting infrastructure such as roads to support transport to and from inspection sites.

IT Systems

35. Now that the UK has left the EU, Great Britain no longer has use of the EU's TRACES (Trade Control and Expert System) to validate imports. The replacement system, the Import of Products, Animals, Food and Feed System (IPAFFS) has been used for imports from outside of the EU. Since 1 January 2022 it has been used for pre-notification of imports from the EU.
36. IPAFFS is a web-based service for online applications and issuing of, Common Health Entry Documents (CHEDs) for imports of live animals, their products and germplasm.
37. Defra is currently mandating pre-notifications on IPAFFS for EU imports prior to the introduction of identity and physical checks. This has the benefit of building compliance with IPAFFS gradually over the coming months. Potentially after a full month of utilisation, there should now be an evidence base within Defra to understand the baseline from which to grow that compliance.
38. Government is undertaking considerable efforts to digitise the process of completing EHCs through the Digital Assistance Scheme (DAS). It is hoped digitisation will make the process of certification quicker, simpler and reduce the potential for human error. There is scope for further schemes to digitise the imports aspects and to streamline the existing IT systems.

EU readiness

39. Any discussion of readiness needs to consider both sides. EU member states will require sufficient OV capacity to provide EHCs for exports to Great Britain. This creates additional demands for veterinary capacity in the EU, when the UK is also generating requirements for veterinary capacity.
40. In most cases in the EU, OVs are directly employed by the state or local authorities. Our understanding is that Defra has been in contact with relevant member state competent authorities to confirm capacity is in place.
41. There was a steep learning curve on both sides of the channel and Irish Sea as SPS measures were applied to exports from Great Britain to the EU Single Market. Based on data shared by the French Embassy, we understand that in the first week of the new trade relationship non-compliances accounted for 90% of exports. That number improved over the weeks and months, and we are now seeing levels of non-compliance akin to other third country trade. This welcome improvement is testament to the hard work of vets across the UK.
42. Senior Defra and APHA staff have attended regular meetings with OVs to determine capacity issues and identify any concerns regarding the completion of EHCs as well as the acceptance of these EHCs by EU BCPs. These concerns are then raised by government with individual BCPs and the EU Commission to ensure consistency. As appropriate, the guidance to Great Britain OVs and Member State BCPs is updated to ensure the advice to exporters is correct. This process has improved, however, there remain periodic issues with the completion of EHCs, both in interpreting the requirements and with inconsistencies in interpretation and implementation at BCPs.
43. Ahead of the full application of the complete range of import controls on movements into Great Britain it is vital that appropriate structures and communication channels are put in place to ensure high compliance and consistency of interpretation as goods move in the opposite direction, learning from the lessons of more than a year of Great Britain exports to the EU Single Market. The data generated from pre-notifications on

IPAFFAS could be utilised today to build a shared understanding of the shared task ahead.

How confident is the sector that the timetable for introducing further checks from July 2022 will be met?

44. From a biosecurity perspective, we would be concerned if the date for import controls was delayed once again. SPS measures serve a vital purpose: protecting national freedom from animal diseases (eg Foot and Mouth Disease and African Swine Fever).
45. The consequences of failing to maintain freedom from disease can be costly. This was vividly illustrated by the Foot and Mouth outbreak in 2001, which is estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities, harmed the reputation of UK agriculture, and caused a general election to be postponed.¹¹ More concerning recently has been the advance of African Swine Fever (ASF), a fatal and highly infectious disease of pigs which could have a significant impact on UK pig industry.
46. UK businesses, port operators, UK and devolved government departments and their agencies have all rearranged plans based on the newly announced timetable. Furthermore, preparations in EU member states have also been based on this assumption.
47. Should there be a further delay, every effort should be taken to communicate changes in good time to support the readiness of the veterinary profession. It is vital to provide clarity to stakeholders in the UK and the EU.

¹¹ National Audit Office, *The 2001 Outbreak of Foot and Mouth Disease*, 2002