Preparing for our future UK trade policy:
British Veterinary Association Submission

1 INTRODUCTION

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 16,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country. We therefore take a keen interest in all issues affecting the profession and how the profession can effectively serve the needs of society.

In this paper the terms veterinary surgeon, veterinarian and vet are used interchangeably. An Official Veterinarian (OV) is a veterinary surgeon appointed by government to carry out authorised duties on its behalf.

We welcome the opportunity to provide feedback to this paper which explores an emerging approach to establishing an independent international trade policy as the UK exits the EU. In drafting our submission, we have drawn on the expertise of BVA specialist divisions, representing veterinary surgeons in different specialisms across the UK. Our branches in Scotland, Wales and Northern Ireland have also provided their insights.

International trade in animals and animal products depends on a combination of factors which should be considered to ensure unimpeded trade, without incurring unacceptable risks to public health and animal health and welfare. Veterinary surgeons, as qualified professionals who play an essential role in the operation of international trade, wish to see a high standard of animal health, welfare and food hygiene established and maintained as a unique selling point for the UK.

Official Veterinarians (OVs) both certify and supervise the import and export of animals and animal products to and from third countries. The role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised as essential throughout the EU and around the world.

Preparing for our future UK trade states the following approach to trade.

“In order to ensure continuity in relation to our trade around the world and avoid disruption for business and other stakeholders, the UK needs to prepare ahead of its exit from the EU for all possible outcomes of negotiations and to ensure that we have the necessary legal powers and structures to enable us to operate a fully functioning trade policy after our withdrawal from the EU.”

For the Government to implement this approach, the role of the veterinary surgeon in facilitating international trade must be recognised and supported. The demand of veterinary certification is increasing and will grow significantly following exit from the EU. Nigel Gibbens, Chief Veterinary

1 Department for International Trade, Preparing for our future UK trade, 2017
Officer UK, has suggested that this could lead to the volume of products requiring veterinary export health certification increasing by up to 325%.²

Ensuring the UK has a veterinary workforce to meet this demand will be critical to ensuring the UK is able to exploit the opportunities of any new trade deals. Therefore, the Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union or from outside the EU, to ensure this essential veterinary work continues.

High UK animal welfare, animal health and public health (including food safety) standards should not be undermined by cheaper imports produced to lower standards. As public goods, the UK should prioritise the maintenance of these standards in all trade negotiations.

Leaving the EU may offer opportunities not enjoyed by being a member of the EU trading bloc. Where opportunities are present to improve standards in accordance with evidence-based risk analysis of animal health, public health, welfare and ethics, these should be seized. Any actual or perceived risks and threats should be approached, in the same rational way, and mitigated to minimise the risks for UK farming, food industry, animal welfare and consumer interests.

2 VETERINARY CERTIFICATION

The import and export of animals and products of animal origin to third countries is dependent on veterinary certification. Veterinary certification is dependent on having available a sufficient number of adequately trained veterinary surgeons. International Veterinary Certificates are defined by the World Organisation for Animal Health (OIE), the reference organisation of the World Trade Organization (WTO) as:

“A certificate, issued in accordance with Chapter 5.2 [of the Terrestrial Animal Health Code³], describing the animal health and public health requirements that are fulfilled by the exported commodities.”⁴

The value of trade in meat, dairy, eggs and fish is significant, and only possible because of the input of vets. The below tables show the value of trade in food at 2016 prices.⁵

<table>
<thead>
<tr>
<th>Item</th>
<th>Value £ million</th>
</tr>
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<tbody>
<tr>
<td>Meat</td>
<td>1 573</td>
</tr>
<tr>
<td>Dairy &amp; eggs</td>
<td>1 371</td>
</tr>
<tr>
<td>Fish</td>
<td>1 639</td>
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⁵ Defra – Agriculture in the UK 2016, 2017
Veterinary certification is applied to live animals, as well as products of animal origin. These are defined as any products derived from animals or products that have a close relationship with animals. They include:

- fresh red meat, white meat, game and offal
- meat products (e.g. cured meats, cooked meats)
- fish, shellfish and fish products
- processed animal protein for human consumption
- processed pet food or raw material for pet food production
- lard and rendered fats
- animal casings
- milk and milk products
- eggs and egg products
- honey
- semen, embryos, ova
- manure, blood and blood products
- bones, bone products and gelatine
- hides and skins
- bristles, wool, hair and leathers
- hay and straw
- hunting trophies, i.e. animal heads and skins
- insect pupae

Additionally, any items which contain products of animal origin, may be subject to certification. Animal products are found in confectionary that uses gelatin and wine and beer where isinglass (derived from the bladders of fish) is used. Consideration should be given to the supply chains behind non-food products that depend on animal products, for example plastic bags that are made using stearic acid derived from animal fat.

Official Veterinarians certify and supervise the import and export of live animals and other animal products to and from third countries ensuring smooth trade. Veterinary surgeons providing official controls at food premises (exporting food) and at border inspection posts (checking imported food) are vital for the protection of the UK consumer and national freedom from animal health diseases (e.g. Foot and Mouth Disease and African Swine Fever). OIE has emphasised the importance of the role of veterinary surgeons in supervising food safety:

“[The] OIE has identified animal production food safety as one of its high priority initiatives. The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-
borne zoonoses, even when animals are not clinically affected... The OIE will continue to publicise and promote the fundamental role of the Veterinary Services in the area of food safety, both on-farm and at the abattoir level.”6

Imports of both animals and animal products may carry pathogens that represent a threat to UK public health and the health of animal populations. The EU sought to minimise the risk by ensuring appropriate standards of production and certification at the point of production thereby obviating the need for most border checks. This means that trade in goods between Member States meet a single standard providing assurances for consumers, via the identification and health mark, a unique number given to the premises at the time of approval for animal products. Therefore, within the EU trading bloc there is no need for additional veterinary certification. Brexit will change that for the UK, but the extent of the changes will depend on the nature of the UK’s exit and the international trade deals agreed.

Should the UK neither become a non-EU EEA country nor enter a customs union with the EU, administrative checks would apply to UK imports from and exports to the EU as currently apply to trade with non-EU countries. This is likely to be the case whether UK trade with the EU is conducted under a Free Trade Agreement or under WTO rules. Any additional costs will be incurred over and above tariff-related costs.

Imports of animals or animal products into the EU must, as a rule, be accompanied by the health certification laid down in EU legislation. This sets out the conditions that must be satisfied, and the checks that must have been undertaken. The certification must be signed by an Official Veterinarian, and must respect the provisions of Council Directive 96/93/EC on the certification of animals and animal products. Strict rules apply to the production, signing and issuing of certificates, as they confirm compliance with EU rules. Each category of animal and product has its own set of animal and public health requirements.

All products of animal origin imported from a third country are subjected to documentary checks, an assessment of the common veterinary entry document public and animal health certificates and accompanying commercial documentation. Rules of origin also apply to third country agricultural imports. In contrast, imports or exports of animal products within the Single Market can simply be accompanied by a commercial document, with details of the contents of the consignment, sender and recipient.

Consequently, post Brexit there will be increased demand for veterinary certification and supervision. The scale of this increase is uncertain. However, Nigel Gibbens, Chief Veterinary Officer UK, has indicated the volume of products requiring veterinary export health certification could increase substantially in the event of no deal being reached between the UK and EU. He has suggested this increase could be as much as 325%.7 Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

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3 CAPACITY TO MEET VETERINARY CERTIFICATION

Fulfilling demand for veterinary surgeons, following the departure of the UK from the EU will be critical to allowing trade. In the short to medium term, it will be impossible to meet this demand with UK nationals. Any increase in UK veterinary students may be a long term and gradual position but there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

The Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union or from outside the EU, to ensure this essential veterinary work continues. As the House of Lords European Union Committee noted in the report Brexit: farm animal welfare:

“Veterinarians play a key role in ensuring and inspecting farm animal health and welfare in the UK from farm to abattoir. They also play an important role in certifying animals in the context of trade. We note the overwhelming reliance on non-UK EU citizens to fill crucial official veterinary positions in the UK, and call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”

Statistics provided by the Royal College of Veterinary Surgeons (RCVS) reveal the dependence of the UK on non-UK EU vets. RCVS currently registers around 1,000 overseas vets per year, of which non-UK EU nationals make up the clear majority. In both 2015 and 2016, RCVS registered more non-UK EU vets than UK graduates.

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9 Information provided by Royal College of Veterinary Surgeons
EU veterinary surgeons make a particularly strong contribution to public health-critical roles, who are indispensable for trading purposes. Estimates suggest 95% of Official Veterinarians (OVs) who are responsible for verifying and auditing meat hygiene in abattoirs graduated overseas with the clear majority of these being non-UK EU graduates.

OVs also minimise the risk of food fraud, promote animal welfare and provide public health reassurance to consumers at home and overseas. There are significant concerns within the meat processing industry about the potential impact of a post Brexit veterinary workforce shortage on the UK agri-food sector which would impact on the UK’s ability to meet its international animal health, public health, and animal welfare obligations and that could jeopardise trade.

As noted above, following Brexit, there will be increased demand for veterinary certification and supervision, which would require more OVs than are currently employed in the sector. As the Institute for Government notes: “If the UK is required to undertake checks on animal produce coming from the EU, it will need an increase in the number of vets.”

When veterinary surgeons are required more than ever, non-UK EU vets are facing considerable uncertainty about their futures. We have called on the Government to guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

In the months following the UK’s decision to leave the EU, there was a reduction in the numbers of EU graduated vets registering to work in the UK. This contradicts the trend, which had seen a steady increase in the numbers of vets from elsewhere in the EU.

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<https://www.instituteforgovernment.org.uk/sites/default/files/publications/IfG_Brexit_customs_WEB_0.pdf>
To protect the trade in animals and animal products, priority must be given to the veterinary profession. As the Government response to the EU Energy and Environment Sub-Committee report Brexit: Farm Animal Welfare notes:

“Many vets working in the UK are EU nationals, including those filling Official Veterinary positions, and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority.”

The veterinary profession is concerned that there will not be a workforce with the capability and capacity necessary to facilitate international trade. We are calling on the Government to undertake a major review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

4 Veterinary Medicines

To protect animal and public health there must be access to medicines for the treatment of animals that meet standards that ensure safety, quality and efficacy. Therefore, the Government should guarantee the UK veterinary profession has ongoing access to all existing and future veterinary medicines licensed through the EU regulatory systems and existing import certificate mechanisms.

Currently, there are three channels for the authorisation of veterinary medicines in the UK. Firstly, there is national authorisation by the Veterinary Medicines Directorate (VMD) when an applicant has applied to the UK only, and has no desire or intention to license and commercialise the product in any other Member State. The second is the centralised procedure, under which an applicant submits a dossier to the European Medicines Agency (EMA) and a product is then licensed for use throughout the EU. Thirdly, the mutual recognition or decentralised procedure by which an applicant submits a dossier to one Member State which undertakes the authorisation. In this third procedure, other Member States may approve the product by mutual recognition of the original marketing authorisation. Any new trade deal should maintain the link with the current EU veterinary medicine approval systems.

5 Objectives for Future Trade Deals

As the UK leaves the EU and looks to “forge new and ambitious trade relationships” we welcome the commitment to “ensuring the maintenance of high standards of consumer, worker and environmental protection in trade agreements.” This commitment should be expanded to explicitly include public goods: animal health; animal welfare; public health (including food safety); and responsible use of antimicrobials.

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12 Department for International Trade, Preparing for our future UK trade, 2017
We welcomed the early pronouncements from the UK Government that it would seek to establish the UK’s “unique selling point” as one of high animal welfare and food safety standards. Where opportunities exist to improve standards in accordance with evidence-based risk analysis of animal health, welfare and ethics, these should be seized.

The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets. A single standard that includes veterinary controls and certifications will avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards, avoid compromised animal welfare, and ensure consumer confidence at home and abroad.

A. ANIMAL WELFARE
Animal welfare is a global concern amongst other pressing concerns including climate change, biodiversity loss, antimicrobial resistance and food security for a growing human population. Ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives. The UK should promote good animal welfare as an important sustainable development goal. Trade acts as a means to achieving this.

UK citizens place value in the welfare of farmed animals. In a recent survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of animals. However future trade deals may undermine these values. The House of Lords European Union Committee noted the “greatest threat to farm animal welfare standards post-Brexit would come from UK farmers competing against cheap, imported food from countries that produce to lower standards than the UK.”

To ensure domestic animal welfare standards and to support animal welfare globally the Government must secure the inclusion of high farm animal welfare standards in the trade agreements it negotiates. Where opportunities are available to improve the welfare of farmed animals, these should be considered in all future trade deals.

B. ANIMAL HEALTH
Protecting animal health through standards and surveillance must be an objective of any further trade policy, to effectively detect, respond to, and prevent outbreaks of disease in animal populations. Outbreaks can have immense social and economic consequences. The Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed.

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16 National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002
The UK Government should ensure that trade deals, in respect of animals and animal products, take account of already agreed protocols such as those applied by the EU or the OIE and are backed by appropriate veterinary certification.

Most pathogens, particularly in animal products, cannot be practically detected during border checks. This is because checks at the border are insufficiently sensitive to detect risk. Future trade deals should emphasise checks at the point of production, where they are more effective.

C. PUBLIC HEALTH INCLUDING FOOD SAFETY
Animal health is inextricably linked to human health. Zoonoses are infections or diseases that can be transmitted directly or indirectly between animals and humans, for instance by consuming contaminated foodstuffs or through contact with infected animals. The severity of these diseases in humans varies from mild symptoms to life-threatening conditions. Among emerging infectious diseases, 75% are zoonotic.17

To protect public health the safety of animals and animal products must be prioritised in trade deals. It is imperative that standards are maintained from farm to fork.

D. ANTIMICROBIAL RESISTANCE
The UK Government has demonstrated strong leadership at home and globally in tackling the issue of antimicrobial resistance. Thanks to these efforts, action has been taken at all levels, at the United Nations; within the EU and domestically. As the forward to the UK Five Year Antimicrobial Resistance Strategy 2013 to 2018 notes:

“There are few public health issues of greater importance than antimicrobial resistance (AMR) in terms of impact on society. This problem is not restricted to the UK. It concerns the entire world and requires action at local, national and global level.”

Encouraged by the publication of the O’Neill Review on Antimicrobial Resistance, the UK agricultural and food industry has taken steps to further the responsible use of antimicrobials. BVA is a member of the Responsible Use of Medicines in Agriculture (RUMA) alliance. In October 2017, RUMA launched sector specific targets for antimicrobial use. UK veterinary sales data show the industry is already acting, with reductions in overall sales and sales of the most critically important antimicrobials.19

Responsible farm antimicrobial use must be incorporated into future trade deals to ensure progress on responsible antimicrobial use is not undermined.

19 Veterinary Medicines Directorate, Veterinary Antimicrobial Resistance and Sales Surveillance 2016, 2017
6 Conclusion

Veterinary surgeons working as official controllers at farms, food premises and other places carry out official controls (inspection and audit). In the UK, these Official Veterinarians work collaboratively with private practitioners. Based on this effective working relationship veterinarians, according to the international trade rules, can certify the import and export of animals and animal products to and from third countries. The role of veterinary surgeons in facilitating trade and protecting public health, food safety and animal welfare, is therefore recognised as essential in UK, EU and around the world.

Following exit from the EU, the UK will likely be treated as a third country by the EU for the purposes of exports and imports. In this case the demand for veterinary certification will grow significantly. Therefore, we are calling on the Government to undertake a major timely review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

To protect animal and public health there must be access to medicines for the treatment of animals any new trade deal with the EU should maintain the link with EU veterinary medicine approval systems.

Any future trade deals should have the following objectives, animal health, animal welfare, public health and food safety and not undercut the leadership of the UK Government at home and abroad in addressing the issue of anti-microbial resistance.