Home Affairs Committee: Post-Brexit migration policy inquiry

Who we are

1. British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 17,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country and we therefore take a keen interest in all issues affecting the profession.

2. We are grateful for the opportunity to submit a response to this inquiry considering Post-Brexit migration policy.

Key points

- There is currently a shortage of veterinary surgeons in the UK, with an estimated shortfall of 11% reported by the Major Employers Group (MEG).

- The UK veterinary workforce is highly reliant on EU graduates. In 2016, the proportion of new registrants from non-UK EU veterinary schools was 47%.

- In the meat hygiene sector, 95% of the veterinary workforce graduated overseas - with the clear majority of these coming from the EU.

- After Brexit the demand for qualified veterinary surgeons will likely rise. In part driven by an increased volume of products requiring veterinary export health certification to facilitate international trade.

- As part of essential Brexit preparation, the Government should undertake a major review of veterinary export certification to ensure the UK has the veterinary capacity to post-Brexit trade.

- To alleviate labour constraints BVA has made the following calls upon Government:
  - Overseas nationals graduating from UK vet schools should be allowed to live and work in the UK.
  - Vets should immediately be restored to the Shortage Occupation List.
• The veterinary profession should be prioritised within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.

Introduction

3. The veterinary profession is relatively small, with around 22,000 UK-practising veterinary surgeons, but its reach and impact are significant. The UK veterinary profession is an integral part of the international scientific community using evidence and practical skills to further animal health and welfare, and public health.

4. Veterinary surgeons work across the economy, allowing strategically important economic sectors to operate successfully. Official statistics put the value of UK livestock outputs at £12.7bn,1 not a penny of which could be realised without the input of a thriving, sustainable veterinary workforce.

5. Vets work closely with farmers to ensure biosecurity measures are implemented. Poor biosecurity can have devastating economic and social consequences. Animal disease outbreaks are a strategic risk on the National Risk Register.2 The Foot and Mouth outbreak in 2001, for example, is estimated to have cost £5billion 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.3

6. As the Government response to the House of Lords EU Energy and Environment Sub-Committee notes:

"Many vets working in the UK are EU nationals…and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority."4

7. Only those registered with the Royal College of Veterinary Surgeons (RCVS) may practise veterinary surgery in the UK. Under the EU Directive on the Mutual Recognition of Professional Qualifications (MRPQ), the RCVS must register EU vets with qualifications awarded by institutions that are recognised in another EU Member State. Therefore, vets who qualify in the EU are not required to sit a statutory exam before registration as a member of RCVS.

8. The demand for veterinary surgeons is likely to increase following exit from the EU. Nigel Gibbens, the then Chief Veterinary Officer UK, suggested that the volume of products requiring veterinary export health certification could increase by as much

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2 Cabinet Office, National Risk Register of Civil Emergencies 2017, 2017
3 National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002
as 325% in the case of no deal being reached between the EU and UK.\(^5\) The initial estimates suggest the figure for Northern Ireland could be more than twice that of the UK generally. It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from EU or from outside the EU, to ensure that essential veterinary work continues.

9. Before the EU referendum, UK veterinary practices were reporting difficulties in recruiting. This problem has been compounded following the Brexit vote, as non-UK EU vets are faced with considerable uncertainty about their futures. Therefore, as a first step, we ask that the veterinary profession is restored to the Shortage Occupation List.

10. A future immigration system must prioritise the veterinary profession. To ensure animal health and welfare; food safety and public health and the facilitation of trade, due regard should be given to the specific needs of the veterinary profession including:

- The projected demand for veterinary surgeons following the exit from the EU;
- The difficulty in meeting this demand with UK citizen vets, including the time and resource needed to increase university capacity;
- The nature of veterinary practices as small businesses faced with the demands of an onerous visa based system.

**Workforce reliance on EU vets**

11. The UK veterinary workforce is highly reliant on EU graduates. Statistics from the RCVS reveal the dependence of the UK on non-UK EU vets. The RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of all new registrants in that year from non-UK EU vet schools was 47%.\(^6\)

12. In the meat hygiene sector, this proportion is even higher with estimates suggesting 95% of the veterinary workforce graduated overseas - with the clear majority of these coming from the EU. Losing Official Veterinarians (OVs) 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. There are concerns within the meat processing industry about the potential impact of a post Brexit veterinary workforce shortage.

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\(^6\) Royal College of Veterinary Surgeons, *RCVS Facts 2016*, 2017
Trade

13. 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 enough adequately trained veterinary surgeons.

14. 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. In the event no deal on regulatory alignment is reached between the EU and UK, there may be a requirement for veterinary checks on all animals and animal products at the border to maintain sanitary and phytosanitary (SPS) standards.

15. Post-Brexit there will almost certainly be increased demand for veterinary certification and supervision. Currently, up to 30% of Official Veterinarians in the UK engaged in export health certification for exports of animals and animal products to non-EU countries are estimated to be EU nationals.

16. 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 veterinary capacity to meet the demand for veterinary certification to ensure the UK has the capacity to facilitate trade post-Brexit.

Academia and research

17. The world-leading veterinary universities in the UK attract and retain the best minds from the EU. Non-UK EU nationals make up 22% of veterinary surgeons working in academia in the UK, most of whom will be in roles directly linked to providing education and training within the undergraduate veterinary degree. Without non-UK EU vets, there would be a loss of specialist knowledge as well as not enough appropriately qualified vets to meet workforce needs.

Clinical practice

18. The Major Employers Group (MEG) represents large veterinary practices, corporate groups and charities that employ over 6,000 veterinary surgeons, predominantly in small animal veterinary practice. MEG estimates that 30% of their combined workforces are non-UK EU graduates. MEG has also found that a higher proportion of non-UK EU graduates work full-time hours compared to UK graduated veterinary surgeons. This therefore increases their overall dependency on non-UK EU vets to above 30%.

19. A review undertaken by MEG in July 2017 of members providing first opinion clinical services direct to the public found well over 600 vacancies open for primary services.

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veterinary surgeons in the UK. Based on MEG’s combined employment at the time of the survey, this represents a workforce shortage of around 11%.

Impact since Brexit vote

20. 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 reverses the trend, which had seen a consistent increase in the numbers of vets from elsewhere in the EU.

![Figure 1. Number of Non-UK EU graduated vet registrations 2008-2017 Data Provided by Royal College of Veterinary Surgeons](image)

21. Before the EU referendum, UK veterinary practices were reporting difficulties in recruiting, with a BVA Voice of the Veterinary Profession (Voice) survey in early 2015 revealing that 40% of practices with vacancies had taken more than three months to recruit in the last year, or had withdrawn the vacancy due to a lack of suitable candidates.  

22. In the November 2016 Voice survey, members were asked whether the result of the EU referendum had affected recruitment. Of the 650 vets who gave an opinion approximately one fifth reported that it had become harder to recruit, zero respondents reported recruitment of vets had become easier because of the Brexit vote. The Veterinary Public Health Association (VPHA) note that in the meat

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8 British Veterinary Association, Voice of the Veterinary Profession (Voice) survey, 2015
9 British Veterinary Association, BVA Workforce Issues Survey, 2017
hygiene sector employers saw a significant decrease in applications for veterinary roles since the referendum.

23. Following the decision that the UK should leave the EU, RCVS commissioned the Institute for Employment Studies (IES) to conduct online surveys to gather the views and intentions of non-UK EU veterinary surgeons and veterinary nurses registered to practise in the UK. Of those who responded to the first survey:

- 18 per cent are actively looking for work outside the UK;
- 32 per cent are considering a move back home;
- 40 per cent think they are now more likely to leave the UK.

24. In Autumn 2017, the Society of Practising Veterinary Surgeons (SPVS) conducted a survey on recruitment within the veterinary profession. The survey found a deterioration in the ability of practices to hire suitably qualified staff. In the 2015 survey 30% of those advertising a position had found it easy, defined as taking less than 3 months to identify a suitable candidate for a post. By the same definition, in 2017 only 22% of respondents had easily recruited a candidate, with 47% taking more than 3 months to find someone, whilst 31% had failed to find any suitable candidate at the time of response to the survey.

Future demand

25. Fulfilling demand for veterinary surgeons, following the departure of the UK from the EU will be essential to maintain animal health and welfare, public health, food safety and trade. 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.”

26. On leaving the EU, the UK will not merely need to maintain the current level of veterinary workforce, but also meet additional demands. Post-Brexit the UK may be regarded as a third country by the EU for the purposes of exports and imports. Consequently, there may be increased demand for veterinary certification and supervision. As the Institute for Government notes: “If the UK is required to

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undertake checks on animal produce coming from the EU, it will need an increase in the number of vets."\textsuperscript{11}

27. The government has stated that “high environmental and food standards will not be diminished or diluted because of leaving the EU or establishing free trade deals with other countries.”\textsuperscript{12} Consequently, there will be no reduction in the demand for vets going forward.

28. A consistent supply of qualified vets will be necessary to maintain these standards. In the short to medium term, it will be impossible to meet this demand with UK nationals alone.

Meeting demand domestically

29. Consideration should be given to how this demand could be met domestically - both by educating new veterinary surgeons and by ensuring greater retention of the existing workforce.

Education

30. There are concerns about how quickly the capacity of UK universities could be further expanded to meet a massively increased demand at short notice. Increasing capacity takes time, money (both initial capital and ongoing revenue), and personnel. The University of Surrey announced well-progressed plans to open the school of veterinary medicine in October 2012;\textsuperscript{13} the first cohort of students will not graduate until 2019.

31. Additional resource will be needed to expand capacity within UK veterinary schools. The current cost of veterinary courses is estimated at £20,000 per student per annum.\textsuperscript{14} This is more than the £9,000 covered by student fee plus the current support provided by the Office for Students and devolved administrations.

32. Further, UK students are currently subsidised by the high fees of overseas students; a re-balancing in favour of producing more domestic graduates would


\textsuperscript{12} George Eustice MP, Minister of State (Department for Environment, Food and Rural Affairs) July 2017 <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-07-07/3647/>

\textsuperscript{13} University of Surrey, New Veterinary School plans to embrace links between human and animal health Thursday 25 October 2012 <https://www.surrey.ac.uk/mediacentre/press/2012/92737_new_veterinary_school_plans_to_embrace_links_between_human_and_animal_health.htm>

\textsuperscript{14} Veterinary Schools Council, Maintaining excellence and sustainability in UK veterinary education and research post-Brexit <http://www.vetschoolscouncil.ac.uk/wp-content/uploads/2017/05/Veterinary-education-research-post-Brexit-VSC.pdf> (Source: Adapted from Universities UK analysis of Higher Education Funding Council for England TRACT(T) and Office for Fair Access data)
therefore jeopardise the funding model of some veterinary schools. Of all undergraduates 14% are international (5% EU and 9% are non-EU).\textsuperscript{15}

33. The veterinary students from third countries who are educated in the UK, at present are qualified to practise in the UK but are often unable to stay because of visa restrictions. Accommodating these graduates within a post-Brexit immigration policy would assist with alleviating an impending workforce shortage.

34. However, an increase in domestically trained vets will not necessarily translate into vets who will easily substitute for the non-UK EU vets we may lose access to. In part this is because, though UK students are taught public health to a high standard, UK graduates are less likely to choose to pursue public health work alone as a career.

Retention of existing workforce

35. BVA and RCVS have expended considerable time, effort and resource to retain graduates within the profession. Together, we launched the report Vet Futures – Taking charge of our future\textsuperscript{16} in November 2015. The Vet Futures project aims to improve retention of the existing veterinary workforce by ensuring veterinary professionals are confident, resilient, healthy and well supported, and benefit from exceptional leadership.

36. Whilst retention has been recognised as a pre-Brexit problem it has been exacerbated since the referendum due to uncertainty about ongoing rights to employment. Considering the projected demand for vets, it is impossible for this to be met in the short term domestically.

Our Calls

37. At present, non-UK EU vets are faced with considerable uncertainty about their futures. The publication of the joint report on progress in phase 1 of the Brexit negotiations has provided some clarity on the way forward.\textsuperscript{17} We now call upon the Government to bring forward a system that will give effect to this agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

38. After Brexit the demand for qualified veterinary surgeons will likely rise. In part driven by an increased volume of products requiring veterinary export health certification to facilitate international trade. As part of essential Brexit preparation,

\textsuperscript{15}HESA data 2015/16
\textsuperscript{17}European Commission and UK Government, Joint report from the negotiators of the European Union and the United Kingdom Government on progress during phase 1 of negotiations under Article 50 TEU on the United Kingdom's orderly withdrawal from the European Union, 2017
the Government should undertake a major review of veterinary certification to ensure the UK has the veterinary capacity to facilitate post-Brexit trade.

39. In 2011, the veterinary profession was removed from the Home Office Shortage Occupation List because the Migration Advisory Committee made an assessment that there were sufficient veterinary surgeons to meet demand. However, this move did not anticipate the possible loss of non-UK EU graduates from the veterinary workforce. Therefore, we call for vets to be immediately restored to the Shortage Occupation List.

40. The veterinary students from third countries who are educated in the UK, at present are qualified to practise in the UK but are often unable to stay because of visa restrictions. Accommodating these graduates within a post-Brexit immigration policy would assist with alleviating an impending workforce shortage. It would also allow graduates who have contributed to UK economy and wider society to continue to do so.

41. A future immigration system must prioritise the veterinary profession, to ensure animal health and welfare; food safety and public health and the facilitation of trade. Due regard should be given to the specific needs of the veterinary profession. Most veterinary practices are SMEs and as such will have limited capacity and human resources expertise. Any future immigration system for EU citizens must not place additional administrative or fiscal burdens on veterinary practices.