Who we are

The 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.

BVA Scottish Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Scotland. The Branch advises BVA on the consensus view of Scotland members on local and United Kingdom issues.

We are grateful for the opportunity submit a joint response to this inquiry considering immigration and Scotland.

Introduction

A strong veterinary workforce is vital to maintaining high animal health and welfare, food safety standards and overall public health. Currently, 14 per cent of the 2,252 vets working in Scotland are EU-graduates, according to Royal College of Veterinary Surgeons (RCVS) figures. Each year, around 50% of new vets registering to practise in the UK come from overseas.

The economic and social contribution of vets to Scotland is vast. Vets play a crucial role in helping to build strong agricultural communities and supporting Scotland’s agricultural industry as a cornerstone of the Scottish economy. With 80% of Scotland’s land mass used for agricultural production and 1 in 10 of all Scottish jobs dependent on agriculture in some way,¹ the value of vets in Scotland is clear. Scotland’s farmers, crofters and growers produce output worth around £2.9 billion a year, and are responsible for much of Scotland’s £5 billion food and drink exports.

Exports of Scottish salmon to the EU were valued at £204million for 2016.² This industry relies on non-UK EU vets working directly for salmon farming companies and in supporting industries such as pharmaceutical companies involved in crucial medicines supply and development.

The veterinary profession is relatively small, but its reach and impact are significant; the ramifications of a loss of even a small percentage of the workforce would be great. 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.”

We therefore ask, that a future UK immigration system delivers on the Prime Minister’s stated priority.

Nigel Gibbens, Chief Veterinary Officer UK, has suggested that the volume of products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK. It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union post-Brexit or from outside the EU, to ensure that the benefits of trade continue.

Before the EU referendum, 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.

A future immigration system must prioritise the veterinary profession. The Government should consider the economic and social impact the profession has, beyond its relatively small size. To ensure animal health and welfare; food safety and public health; research and the facilitation of trade which requires veterinary certification, 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 unable to meet the demands of an onerous visa based system.

**Workforce reliance on EU vets**

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

In the meat hygiene sector, this proportion is even higher with estimates suggesting 95% of the veterinary workforce here graduated overseas - with the clear majority of these coming from the rest of the EU. Losing Official Veterinarians 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 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.

---

5 Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017
Trade

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.

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. Imports of animals or animal products into the EU must, as a rule, be accompanied by the health certification laid down in EU legislation.

Consequently, 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. Nigel Gibbens, Chief Veterinary Officer UK, has suggested that this could lead to the volume of animal products requiring veterinary export health certification increasing by up to 325% in the case of no deal being reached between the EU and UK. Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

Academia and research

Scotland’s world-leading veterinary research universities and institutes attract and retain the best minds from the EU. Researcher mobility is “of critical importance to the UK science community, including academia, business and charities”, and “researcher mobility must be protected if UK science and research is to remain world-leading”. This is true for veterinary science, where 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 will not be enough appropriately qualified vets to meet workforce needs.

Clinical practice

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, representing approximately 30% of all practising veterinary surgeons in the UK. MEG estimates that 30% of their combined workforces are non-UK EU graduates and these figures are borne out by RCVS data. 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%.

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 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%.

Short term impact since Brexit vote

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.\(^9\)

In the November 2016 Voice survey, members were asked whether the result of the EU referendum had affected recruitment of veterinary surgeons to their own organisation. 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.\(^10\)

The Veterinary Public Health Association (VPHA) note that in the meat hygiene sector employers have seen a significant decrease in applications for veterinary roles since the referendum.

Following the decision that the UK should leave the EU, RCVS commissioned the Institute for Employment Studies (IES) to conduct three online surveys over a two-year period to gather the views and intentions of veterinary surgeons (VSSs) and veterinary nurses (VNs) registered to practise in the UK whose nationality is non-UK European. 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.

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.

Between 25th September and 6th October 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 past year. 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

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

\(^10\) British Veterinary Association, *BVA Workforce Issues Survey*, 2017
call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”

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 all EU countries may fall to be regarded as third countries 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 undertake checks on animal produce coming from the EU, it will need an increase in the number of vets.”

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.” Consequently, there will be no reduction in the demand for vets going forward.

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. Any increase in UK veterinary students may be a long term and gradual position but as a substantial solution there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

Meeting demand domestically

As can be seen above, the UK, including Scotland, has relied on the contributions of non-UK EU vets. After Brexit, there will be consideration given to how this demand could be met domestically—both by educating new veterinary surgeons or by ensuring greater retention of the exiting workforce.

Education

Across the UK steps have been taken to expand capacity within veterinary education. In part, these additional numbers have been facilitated by new universities initiating veterinary science courses. The University of Nottingham officially opened the School of Veterinary Medicine and Science in April 2007, the first purpose-built new veterinary school to be opened in the UK in 50 years. The University of Surrey opened its School of Veterinary Medicine in October 2015. There are concerns about how quickly the capacity of UK universities could be 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 plans to open the school of veterinary medicine in October 2012; the first cohort of students will not graduate until 2019. At present, the course is not

---

13 George Eustice MP, Minister of State (Department for Environment, Food and Rural Affairs) July 2017  
14 University of Surrey, New Veterinary School plans to embrace links between human and animal health Thursday 25 October 2012
approved for RCVS membership purposes and this will be the case until 2019 when the first students complete their training. RCVS accreditation is not a guaranteed. The Surrey veterinary school cost £45 million to establish.

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. This is more than the £9,000 covered by student fee plus the current support provided by the Scottish Funding Council (SFC) or similar funding from the Higher Funding Council for England (HEFCE). Further, UK students are currently subsidised by the high fees of overseas students; a re-balancing in favour of producing more domestic graduates would therefore jeopardise the funding model of some veterinary schools, requiring more additional funding per UK student place. This is a concern for the two veterinary schools in Scotland, where 42% all registered students are from outside the UK and EU. This is in part due to the fact both university courses are accredited by the American Veterinary Medical Association (AVMA).

An increase in veterinary places in UK universities would 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 rarely choose to pursue OV work alone as a career.

Retention of existing workforce

There are considerable efforts underway to retain graduates within the profession. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.

BVA and RCVS have expended considerable time, effort and resource to addressing this problem. Together, we launched the report Vet Futures – Taking charge of our future 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. In July 2016, the Vet Futures Action Plan, was launched with a series of actions to make this vision a reality. These actions are ongoing.

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. There will be an ongoing need to meet the demand for veterinary professional from outside the UK.

Our Calls

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

---

15 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)
16 Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017
clarity on the way forward.\textsuperscript{19} We now call upon the UK Government to bring forward legislation that will give legal effect to this agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

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.

A future immigration system must prioritise the veterinary profession. The Government should consider the economic and social impact the profession has, beyond its relatively small size. To ensure animal health and welfare; food safety and public health and the facilitation of trade which requires veterinary certification.

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. Vets have no overarching body, such as the NHS for doctors, that will be well placed to meet these exacting administrative demands. Any future immigration system for EU citizens must not place additional administrative or fiscal burdens on veterinary practices.

- 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 unable to meet the demands of an onerous visa based system.

\textsuperscript{19} European Commission and UK Government, \textit{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