BVA Response to Welsh Government Consultation: The Animals and Animal Products (Examination for Residues and Maximum Residue Limits) (Wales) Regulations 2019

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with 18,000 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.

2. The BVA’s Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

3. We welcome the opportunity to respond to this consultation on the draft update of the Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997.

Purpose of legislation

4. We understand the necessity to review and revise legislation in light of Brexit to ensure it is fit for purpose.

5. We welcome the intention to align veterinary medicines requirements in Wales with those in England and Scotland. On the issue of veterinary medicines in particular a consistent approach to residues is imperative to provide certainty to vets and the farmers they advise. This is especially true for the large number of vets who operate across UK jurisdictions.

6. There is considerable movement of animals and animal products across the Wales/England border. A review of the beef sector in Wales in 2014 found that 72% of Welsh cattle were slaughtered outside Wales.¹ Of the slaughtering that occurred in Wales, 42% comprised cattle born outside Wales. Of British sheep, 31% were bred in Wales but only 24% were slaughtered in Wales.

7. BVA advocates slaughter as close to the point of production as possible. In border areas, the closest abattoir may be in England. Divergence in residue

¹ A Review of the Beef Sector in Wales Commissioned by Hybu Cig Cymru – Meat Promotion Wales (HCC) A report to help identify the strategic options available to inform the future of the Welsh beef industry 2014
regulations could delay this movement by adding a requirement for additional levels of assurance.

8. Additionally, allowing two standards of production could lead to an increase in the risk of food fraud, potentially compromise animal welfare, and leave the UK unable to provide public health guarantees to consumers in Wales, the rest of the UK or to export markets.

9. We therefore welcome the approach taken to provide consistency. We believe this approach should be formalised going forward, because in the area of animal health, animal welfare and agriculture cooperation and collaboration between the four parts of the UK is essential. BVA advised in its report Brexit report:2

“…in a post-Brexit UK we believe that structures should be put in place to ensure ongoing cooperation and collaboration. Our overarching call is therefore for the four parts of the UK to continue to work together for the good of animal health and welfare, and public health.”

Communication of legislation

10. As a result of Brexit, more regulation on veterinary medicines and associated guidance will be within the remit of UK and Welsh authorities. We would ask that consideration be given the presentation of legislation, such as that under consultation to ensure it meets the intended audience.

11. A single legal instrument consolidating the regulation of residues and Maximum Residue Limits is welcome. However, this can be confusing when certain aspects of the legislation are specific to animals that are to be utilised for human consumption and other aspects also cover products for animal consumption. Making these distinctions clear in the legislation as well as the communication of this legislation would be beneficial.

12. The legislation will be relevant to vets working in small animal or equine practice, however this is not clear in the presentation of the legislation. Equine vets may treat some animals without passports to which the regulations will apply. Vets working in small animal practice will often provide treatment to backyard poultry flocks and will need to advice their clients on residues. Clarity on the intended audience for legislation would be beneficial to avoid confusion.

13. BVA, as the representative body for veterinary surgeons is well placed to advise on engagement the profession and would welcome the opportunity to engage on how best to communicate the affect of this legislation.

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2 British Veterinary Association, Brexit and the Veterinary Profession, 2017
https://www.bva.co.uk/uploadedFiles/Content/News_,_campaigns_and_policies/Policies/Future_of_the_profession/brexit-and-veterinary-profession-v.1.0.pdf