Northern Ireland Affairs Committee: Agriculture inquiry

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 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. The BVA’s Northern Ireland Branch brings together representatives of local veterinary associations, BVA’s specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.

3. We welcome the opportunity to respond to this inquiry into the opportunities and challenges for Northern Ireland’s agricultural sector in the light of the UK’s decision to leave the EU.

Introduction

4. The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons, working collaboratively with others, protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.

5. Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards. By carrying out surveillance and enforcement from farm-to-fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the Northern Ireland agri-food production is therefore of great interest and importance to the veterinary profession.
6. Northern Ireland’s agricultural industry is the cornerstone of the local economy. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. As the House of Commons Library notes; agriculture has a “high degree of reliance on the EU market for both inputs and revenues.”

7. This is particularly true for Northern Ireland, where the shared land border between the Republic of Ireland and Northern Ireland has resulted in the development of a highly integrated agri-food sector. According to figures from the Irish Farmers’ Association, the scale of agri-food trade across the Irish land border is vast, annually:

   - Over 400,000 pigs are exported from the Republic of Ireland for processing in Northern Ireland.
   - Almost 400,000 lambs are exported from Northern Ireland to the Republic of Ireland for processing.
   - Over 800m litres of milk are exported from Northern Ireland to be processed and then exported from the Republic of Ireland.

8. Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. A new agricultural policy should be both ambitious and focussed on delivering outcomes.

The potential challenges and opportunities for Northern Ireland’s agricultural sector post-Brexit

9. DEFRA’s consultation on the future for food, farming and the environment is largely focused on transforming agricultural policy in England. The consultation document states “this is a vision that could work for the whole of the UK but we recognise that devolution provides each administration with the powers to decide its own priorities.”

10. Agriculture in Northern Ireland has several particularities which should be reflected within a bespoke Northern Ireland agriculture policy. Of the four constituent parts of the UK, Northern Ireland is most reliant on agriculture in terms of the share of

1 Irish Farmers’ Association, Brexit: The Imperatives for Irish Farmers & the Agri-Food Sector 2016
GVA and percentage share of total employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK.¹

Reliance on CAP funding

11. There are two major strands to CAP payments: one for direct income support (Pillar 1) and the second for rural development (Pillar 2). Direct income support is a much larger programme than rural development. As can be seen in the table below,³ Northern Ireland receives a higher share of the total UK allocation than would be expected from its relatively small population.

<table>
<thead>
<tr>
<th></th>
<th>Pillar I</th>
<th>Pillar II</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>€ million (approximate number, non-inflation adjusted)</td>
<td>€ million (approximate number, non-inflation adjusted)</td>
</tr>
<tr>
<td>England</td>
<td>16,421</td>
<td>1,520</td>
</tr>
<tr>
<td>% share</td>
<td>65.5</td>
<td>58.9</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>2,299</td>
<td>227</td>
</tr>
<tr>
<td>% share</td>
<td>9.2</td>
<td>8.8</td>
</tr>
<tr>
<td>Scotland</td>
<td>4,096</td>
<td>478</td>
</tr>
<tr>
<td>% share</td>
<td>16.3</td>
<td>18.5</td>
</tr>
<tr>
<td>Wales</td>
<td>2,245</td>
<td>355</td>
</tr>
<tr>
<td>% share</td>
<td>8.96</td>
<td>13.7</td>
</tr>
<tr>
<td>Total UK</td>
<td>25.1 billion</td>
<td>2.6 billion</td>
</tr>
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12. At present, member states can transfer up to 15% of the Pillar 1 payments they receive from the EU to its Pillar 2 allocation. The amounts ‘modulated’ from direct payments to rural development programme funding differs across the UK. Wales modulates the full 15% which is allowed compared to 12% in England and 9.5% in Scotland. There is no Pillar 1 to Pillar 2 transfer in Northern Ireland.

13. In part this explains why Northern Ireland farmers are more dependent on direct payments than their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK. However, it is estimated that this provides 87 per cent of total farming income in Northern Ireland.

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¹ Northern Ireland Assembly Research and Information Service Briefing Paper, Northern Ireland’s agri-food sector – background and possible ‘Brexit’ considerations, 2016
³ House of Commons Library, Brexit: impact across policy areas, Briefing Paper 07213, August 2016, p 54
14. Any change in policy must be cognisant of this dependence and properly examine any consequences. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries.

15. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes. More challenging will be determining the impact on the wider rural economy that deliver goods and services to farms. Farm animal veterinary practices in the UK represent an important service sector to livestock farmers, and act as means to detect disease and enforce animal health and welfare legislation. Ensuring the continued capability of farm animal practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government.

**Land border between Northern Ireland and Ireland**

16. As the only part of the UK to share a land border with an EU Member State, the issues facing Northern Ireland are complex and unique. Across the border there are strong government, business and social relationships. Any impediment to the free movement of people, goods (including animals) and services across the border will impact on these long-standing arrangements. Currently, there is uncertainty for farmers who may wish to cross the border with live animals or products of animal origin.

17. Diseases do not necessarily respect political borders. North-South cooperation has enabled the island of Ireland to be treated in policy and operational terms as a single epidemiological unit for the purposes of animal health and welfare. Currently, there is an all-island approach taken to the control of animal disease and disease surveillance through government and non-government initiatives. Following Brexit, it will be imperative to maintain this cooperation.

**Coordination between UK Governments**

18. As can be seen above, there are substantive differences between Northern Ireland and elsewhere in the UK, which will need to be addressed by post-Brexit agricultural policy. However, there should remain a degree of coherence to agricultural policy amongst all four administrations. Coordination and oversight on matters of animal health and welfare is crucial. There will therefore need to be consideration where decisions on agricultural policy are taken, and how best to coordinate efforts across the nations of the UK.

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4 Department for Exiting the European Union, Northern Ireland and Ireland Position Paper, 2017
19. To facilitate this, the UK governments should establish a body to oversee and coordinate animal health and welfare policy across the four administrations of the UK and facilitate partnership working between industry and government to tackle endemic disease and animal health and welfare challenges.

**How a post-Brexit agriculture policy should operate**

20. The Health and Harmony consultation paper sets out a recalibration of the system of agricultural support in England, with a phased withdrawal of direct payments to farmers. This will be replaced with a system of public money being used for public goods that benefit producers, consumers and wider society. BVA has supported this approach of public money for public goods.

21. BVA has called on the Government to utilise public money to incentivise and support animal health and welfare outcomes as public goods. Therefore, we welcome the UK Government recognition of animal health and welfare as public goods that will be supported within future agricultural policy post-Brexit. We would support this approach being adopted in Northern Ireland.

22. We would note the below principles which will be fundamental to support animal health and welfare within a post-Brexit agriculture policy:

**Veterinary Involvement**

23. Veterinary surgeons working within the production animal sector work closely with farmers and animal keepers to ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. Both private veterinary surgeons and Government employed veterinary surgeons are uniquely positioned to make every on-farm contact count, by providing a holistic approach to overall herd health and welfare, its wider determinants and, in turn, disease surveillance and prevention. Thus, the involvement of the veterinary profession within any new agricultural policy will be integral to achieving its aims. Policy-makers should actively engage veterinary expertise.

**Outcomes based**

24. We note the intention within the DEFRA “Health and Harmony” consultation document to replace cross compliance with “a new, better targeted and proportionate mechanism to enforce the regulatory baseline.” Measurement should be predominantly based on outcomes and done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal
management and husbandry practices, thereby promoting high animal health and welfare. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct appraisal.

Animal welfare stewardship programme

25. In the report Brexit and the Veterinary Profession, we proposed a new animal welfare stewardship programme. This call is in line with the Farm Animal Welfare Committee (FAWC) and the Veterinary Development Council recommendations that the UK governments should work with industry to actively protect animal health and welfare and that this should include consideration of a farm animal welfare stewardship programme. Such a scheme, focussed on health and welfare, evidence-based and with welfare outcome safeguards, would use financial support for animal welfare as a public good, as has been the case for environmental stewardship. In 2014, the FAWC set out a proposed approach to developing such a stewardship programme starting with limited trials in each of the main livestock sectors.

Farm assurance

26. Post-Brexit agriculture policy could also support animal health and welfare by encouraging uptake of farm assurance schemes to incentice animal health and welfare outcomes. Farm assurance schemes enable citizens to make sustainable and ethically informed choices about the food products they buy and the impact of these products on animal health and welfare. Health and Harmony states that Defra is “considering whether providing greater clarity of information to consumers could support higher welfare production.” We support this aim, as well as Government ensuring labelling and farm assurance schemes are underpinned by evidence and welfare outcome safeguards. The veterinary profession has a key role to play in informing and educating the public regarding the value and provenance of animal derived food.

Disease surveillance

27. The withdrawal of the UK from the EU will have far-reaching implications on the UK’s biosecurity and disease surveillance policy. EU legislation, structures and

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5 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
6 FAWC (previously the Farm Animal Welfare Council), Economics and Farm Animal Welfare, 2011
institutions are embedded within the UK surveillance network. This is particularly true for Northern Ireland where an all-island approach is taken to the control of animal disease and disease surveillance through government and non-government initiatives. The development of a new agriculture policy should be taken as an opportunity to modernise and optimise the disease surveillance network.\(^9\) This can be achieved through:

- Maintaining the current level of Government resource spent on the scanning surveillance network.
- Adopting new approaches to data collection and feedback.
- Optimising appropriate skills and expertise.
- Rethinking traditional approaches to funding and coordination.
- Articulating the value of surveillance reporting to the veterinary profession and other stakeholders through education to increase awareness and participation.
- Working collaboratively with stakeholders to explore innovative communication strategies.

**UK trade policy and Northern Ireland’s agricultural sector**

28. Should the UK neither become a non-EU European Economic Area (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. However, concluding a customs agreement without a deal on regulatory alignment would require checks on animals, animal products and plants at the border to maintain sanitary and phytosanitary standards. This in turn could reduce the efficiency of traffic moving across the border. To avoid this happening in relation to Northern Ireland, the Government has proposed:

"An agreement on regulatory equivalence for agri-food, including regulatory cooperation and dispute resolution mechanisms"\(^10\)

29. The role of the veterinary surgeon in facilitating trade must be recognised and supported. Official Veterinarians (OVs) working on farms, food premises and other settings in Northern Ireland carry out official controls (inspection and audit). 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

\(^9\) British Veterinary Association, *BVA Position on veterinary scanning surveillance (animal health and disease monitoring)*, 2018

\(^10\) Department for Exiting the European Union, Northern Ireland and Ireland Position Paper, 2017

health, food safety and animal welfare, is therefore recognised as essential throughout the EU and around the world.

30. The demand for veterinary certification is increasing and will grow significantly following exit from the EU. Nigel Gibbens, then Chief Veterinary Officer UK, suggested that this could lead to the volume of products requiring veterinary export health certification increasing by as much as 325% in the event of no deal being reached between the EU and UK. Initial estimates suggest that for Northern Ireland this figure could be double.

31. As the UK leaves the EU and looks to “forge new and ambitious trade relationships”, we welcome the Government commitment to “ensuring the maintenance of high standards of consumer, worker and environmental protection in trade agreements.” In our response to the Department for International Trade White Paper, Preparing for our future UK trade policy, BVA called for this commitment to be expanded to explicitly include public goods: animal health; animal welfare; public health (including food safety); and responsible use of antimicrobials.

32. 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 high food safety standards. This reputation is true for Northern Ireland and has recently benefited from approval of Bovine Spongiform Encephalopathy (BSE) negligible risk status.

Labour needs of Northern Ireland’s agricultural sector

33. A strong veterinary workforce is vital to maintaining high animal health and welfare, public health including food safety standards and the facilitation of 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.

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12 Department for International Trade, Preparing for our future UK trade, 2017
13 British Veterinary Association, Preparing for our future UK trade policy: British Veterinary Association Submission, 2017
14 Former Environment Secretary, Andrea Leadsom MP, speaking at NFU conference 2017, reported Farming UK
34. To safeguard animal health, animal welfare, food safety and public health, the UK needs a veterinary workforce with adequate capacity and capability.

35. The UK veterinary workforce is highly reliant on EU graduates. This reliance is particularly acute within the meat hygiene sector. Estimates suggest 95% of the veterinary workforce working in abattoirs graduated overseas - with the clear majority of these coming from the rest of the EU. Losing Official Veterinarians (OVs) from slaughterhouses would increase the risk of food fraud, provide opportunities for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could jeopardise trade.

36. It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU post-Brexit or from outside the EU, to ensure that essential veterinary work continues. To alleviate labour constraints, BVA has made the following calls upon Government:

- To bring forward legislation that will give legal effect to the report on progress in phase 1 of the Brexit negotiations agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.
- Vets should immediately be restored to the Shortage Occupation List.
- Prioritise the veterinary profession within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.
- Allow overseas nationals graduating from UK vet schools to live and work in the UK.