APHA PROPOSED REVISION OF EXISTING FEES FOR STATUTORY SERVICES – BVA / BSAVA / SPVS RESPONSE

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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) We have consulted specialist divisions the British Small Animal Veterinary Association (BSAVA) and the Society of Practising Veterinary Surgeons (SPVS)

3) We understand that APHA is seeking views on proposals to introduce new fees to achieve Full Cost Recovery (FCR) for services which are currently provided free of charge, namely Animal By-Products (ABPs), Animal Gatherings (England and Wales only), and Pet Passports. The proposals form part of a review of current processes to identify efficiencies and improvements and failure to implement FCR would impact on the Agency’s ability to deliver other critical work.

Animal By-Products

4) As veterinary practices do not require approval as ABP operators nor are they required to register as ABP hauliers when transporting pet cadavers from domestic premises or branch surgeries to the main practice for disposal we do not feel that we need to comment on APHA proposals for FCR for ABP inspections. However, we would appreciate reassurance that the exemptions for veterinary practices will remain in place.

Animal Gatherings

5) Although veterinary practices will not be directly affected by APHA proposals for FCR for the licensing of animal gatherings (including markets, collection centres and shows) we support the principle of a fixed fee structure which takes into account the different levels of disease risk posed by the different types of animal gathering. We would appreciate reassurance that these proposals do not apply to animal gatherings involving companion animals.

Pet Passports

6) Regarding pet passports, these are an integral part of the existing legislation to control the international movement of pets (cats, dogs and ferrets) in order to maintain the UK’s freedom from rabies and Echinococcus multilocularis, and must be complemented by effective border controls and surveillance. We understand the need to introduce fees to recover costs and recognise that veterinary practices will be able to transfer the costs of providing this service to the individuals who wish to undertake international travel with their pets. We agree that the relative additional cost to a client, who is already paying for their pet to be prepared for international travel, would be small, and fully expect that veterinary practices would recoup any charges incurred.

7) We are aware that the number of passports issued will vary significantly between different practices and would therefore suggest that consideration is given to providing a range of batch sizes for different practice needs. APHA should also ensure that processes are in place for online ordering and prompt supply of passports to practices.

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