Scottish Affairs Committee: Scotland and Brexit: Trade and Foreign Investment inquiry

Who we are

1. 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. We therefore take a keen interest in all issues affecting the profession and how the profession can effectively serve the needs of society.

2. 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.

3. In this paper the terms veterinary surgeon, veterinarian and vet are used interchangeably. An Official Veterinarian (OV) is a veterinary surgeon appointed by government to carry out authorised duties on its behalf.

4. BVA welcomes the opportunity to respond to this inquiry on Scotland, Brexit and trade.

Key points

5. 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.

6. A veterinary export certificate is a written statement made with authority; the authority in this case coming from the veterinarian’s professional status. Veterinarians have a professional responsibility to ensure the integrity of veterinary certification, taking into account the 10 Principles of Certification set out by the Royal College of Veterinary Surgeons (RCVS), the regulator of the profession.¹

7. The then 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.

8. 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 trade with the EU.

9. Each year, around 50% of vets registering to practise in the UK come from overseas, with the vast majority of these coming from the rest of the EU. Therefore, a future immigration system must prioritise the veterinary profession. In the short term, vets should be immediately restored to the Shortage Occupation List.

Introduction

10. 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,² 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.

11. Exports of Scottish salmon to the EU were valued at £204 million for 2016.³ 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.

12. Agri-food, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries.⁴ Veterinary surgeons play an essential role in the operation of trade, working as official controllers at farms, food premises and other settings carrying out official controls (inspection and audit). These Official Veterinarians (OVs) both certify and supervise the import and export of animals and animal products to and from third countries.

13. Unless a comprehensive deal is negotiated between the UK and EU where recognition of regulatory alignment on animal health standards is retained, it is likely that there will be a need for border checks for biosecurity purposes. This is because imports of both animals and animal products present the highest level of risks as they can transmit serious human and animal diseases.

14. Where third countries export into the EU, EU Regulation 882/2004,⁵ (soon to be replaced by 625/2017)⁶ requires border inspection posts for sanitary and phyto-

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² NFUS, Farming Facts: Scottish farming, 2017, Available at: https://www.nfus.org.uk/farmingfacts.aspx
⁴ House of Commons Library, Briefing Paper Number 8065, 1 August 2017 Importance of trade with the EU for UK industries
sanitary checks in the immediate vicinity of the border. These are documentary, identity and physical checks of live animals and products of animal origin to ensure animal health, animal welfare and food safety standards are met. Michel Barnier has stated that EU border controls could be applied to “100% of imports of live animals and products of animal origin”.7

15. In the event of no deal being reached between the EU and UK, the volume of products requiring veterinary export health certification could increase by up to 325%.8

16. The requirement for veterinary checks on animals and products of animal origin at ports could reduce the efficiency of traffic passing through the UK’s ports. Additional capacity at ports will be necessary. Extra inspections and inspection points will be needed. Additional OVs to execute the inspections will be required on site.

17. Ensuring the UK has a veterinary workforce to meet this demand will be critical to ensuring the UK is able to exploit the opportunities for trade in agricultural produce. In both 2015 and 2016, RCVS registered more non-UK EU vets than UK graduates.9 Therefore, the Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU or from outside the EU, to ensure this essential veterinary work continues.

Veterinary certification in trade

18. 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.

19. Veterinary certification is applied to live animals, as well as products of animal origin. These are defined as any products derived from animals or products that have a close relationship with animals. Animal products include:10

- fresh meat and offal
- game and poultry
- meat products
- fish, shellfish and fish products
- processed animal protein for human consumption
- processed pet food or raw material for pet food production
- lard and rendered fats
- animal casings

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9 Information provided by Royal College of Veterinary Surgeons
• milk and milk products
• eggs and egg products
• honey
• semen, embryos, manure, blood and blood products
• bones, bone products and gelatine
• hides and skins
• bristles, wool, hair and leathers
• hay and straw
• hunting trophies, ie animal heads and skins
• insect pupae

20. Additionally, any items which contain products of animal origin, may be subject to certification. Animal products are found in confectionary that uses gelatine and wine and beer where isinglass (derived from the bladders of fish) is used. Consideration should be given to the supply chains behind non-food products that depend on animal products, for example plastic bags which are made using stearic acid derived from animal fat.

21. OVs providing official controls at food premises (exporting food) and at border inspection posts (checking imported food) are vital for the protection of the UK consumer and national freedom from animal health diseases (e.g. Foot and Mouth Disease and African Swine Fever). The World Organisation for Animal Health (OIE), a reference organisation of the World Trade Organization (WTO), has emphasised the importance of the role of veterinary surgeons in supervising food safety:

“[The] OIE has identified animal production food safety as one of its high priority initiatives. The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-borne zoonoses, even when animals are not clinically affected...The OIE will continue to publicise and promote the fundamental role of the Veterinary Services in the area of food safety, both on-farm and at the abattoir level.”

22. Imports of both animals and animal products may carry pathogens that represent a threat to UK public health and the health of animal populations. The EU sought to minimise the risk by ensuring appropriate standards of production and certification at the point of production thereby obviating the need for most border checks. This means that trade in goods between Member States meet a single standard providing assurances for consumers, via the identification and health mark, a unique number given to the premises at the time of approval for animal products. Therefore, within EU trade there is no need for any 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.

23. 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 and animal products at the border to maintain sanitary and phytosanitary standards.

24. Imports of animals or animal products from a third country into the EU must, as a rule, be accompanied by the health certification laid down in EU legislation. This sets out the conditions that must be satisfied, and the checks that must have been undertaken. The certification must be signed by an OV, and must respect the provisions of Council Directive 96/93/EC on the certification of animals and animal products. Strict rules apply to the production, signing and issuing of certificates, as they confirm compliance with EU rules. Each category of animal and product has its own set of animal and public health requirements.

25. All products of animal origin imported from a third country are subjected to documentary checks, an assessment of the common veterinary entry document, public and animal health certificates and accompanying commercial documentation. OV’s are an essential part of these checks. Rules of origin also apply to third country agricultural imports. In contrast, imports or exports of animal products within the Single Market can simply be accompanied by a commercial document, with details of the contents of the consignment, sender and recipient.

26. After Brexit there may be the potential for new trade deals which expand access in markets outside the EU. It would be unwise to make assumptions about the detail of such an agreement. The process to reach agreement can also be lengthy. Peter Hardwick, Head of Exports at the Agriculture and Horticulture Development Board (AHDB) notes that to “get the deal that we have with China on pork took us negotiating around seven years to complete because of the sanitary requirements.”

27. Consequently, post Brexit there will be increased demand for veterinary certification and supervision. The scale of this increase is uncertain. In October 2017, Nigel Gibbens, then Chief Veterinary Officer UK, indicated the volume of products requiring veterinary export health certification could increase “by 325%”. Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

12 House of Lords, Energy and Environment Sub-Committee, Corrected oral evidence: Brexit: agriculture Wednesday 8 February 2017

28. Where additional veterinary certification checks on animals and products of animal origin are required at ports this will reduce the efficiency of traffic passing through. To maintain current trade and to capture the benefits of any new trade deals additional capacity at ports will be necessary. Extra inspections and inspection points will be needed. Furthermore, the necessary additional OVs to execute the inspections will be required on site.

29. Much of the wider discussion has focussed on maintaining tariff free trade with the EU as part of future arrangement. However, it is essential to recognise non-tariff barriers and the additional costs that may be incurred to meet them, over and above tariff-related costs.

Veterinary Workforce

30. 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.

31. The UK Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU or from outside the EU, to ensure this essential veterinary work continues. 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."¹⁴

32. Statistics provided by RCVS reveal the dependence of the UK on non-UK EU vets. RCVS currently registers around 1,000 overseas vets per year, of which non-UK EU nationals make up the clear majority. In both 2015 and 2016, RCVS registered more non-UK EU vets than UK graduates.¹⁵

33. EU veterinary surgeons make a particularly strong contribution to public health-critical roles, who are indispensable for trading purposes. Estimates suggest 95% of OVs who are responsible for verifying and auditing meat hygiene in abattoirs graduated overseas with the clear majority of these being non-UK EU graduates.

¹⁵ Information provided by Royal College of Veterinary Surgeons
34. OVs also minimise the risk of food fraud, promote animal welfare and provide public health reassurance to consumers at home and overseas. 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 and that could jeopardise trade.

35. As noted above, following Brexit, there will be increased demand for veterinary certification and supervision, which would require more OVs than are currently employed in the sector. 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.”16

36. When veterinary surgeons are required more than ever, non-UK EU vets are facing considerable uncertainty about their futures. We have called on the Government to provide legal certainty on working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

37. Available data from the RCVS show that 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.

![Figure 1. Number of Non-UK EU graduated vet registrations 2008-2017 Data Provided by Royal College of Veterinary Surgeons](https://www.instituteforgovernment.org.uk/sites/default/files/publications/IfG_Brexit_customs_WEB_0.pdf)
38. To protect the trade in animals and animal products, priority must be given to the veterinary profession. As the Government response to the EU Energy and Environment Sub-Committee report Brexit: Farm Animal Welfare notes:

"Many vets working in the UK are EU nationals, including those filling Official Veterinary positions, and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority." 17

39. Concerns about the capacity of the veterinary workforce were recognised as a pre-Brexit problem. However, this concern has increased since the referendum due to uncertainty about ongoing rights to employment. The veterinary profession is concerned that there will not be a workforce with the capability and capacity necessary to ensure animal health and welfare; food safety and public health and the facilitation of trade. We are calling on the Government to undertake a major review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

Conclusions

40. Official Veterinarians working on farms, food premises and other places carry out official controls (inspection and audit). Across the UK OVs, according to international trade rules, can certify the import and export of animals and animal products to and from third countries. The role of veterinary surgeons in facilitating trade and protecting public health, food safety and animal welfare, is therefore recognised as essential in the UK, EU and around the world.

41. Following exit from the EU, the UK may be treated as a third country by the EU for the purposes of exports and imports. In this case the demand for veterinary certification will grow significantly. Therefore, we are calling on the Government to undertake a major timely review of third country certification to ensure the UK has the capacity to facilitate new trade agreements.

42. Ensuring the UK has a veterinary workforce to meet demand will be critical. 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. 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.

43. 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 and the up to date evidence of a shortage in the profession. Therefore, we call for vets to be immediately restored to the Shortage Occupation List.

44. 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.