

MIGRATION ADVISORY COMMITTEE: CALL FOR EVIDENCE

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 16,000 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.

The Royal College of Veterinary Surgeons (RCVS), is the statutory regulator for veterinary surgeons, responsible for the registration of veterinary surgeons and veterinary nurses in the UK, and sets, upholds and advances their educational, ethical and clinical standards.

We are grateful for the opportunity submit a joint response to this call for evidence.

INTRODUCTION

The veterinary profession is relatively small, with around 23,000 UK-practising veterinary surgeons, but its reach and impact are significant. The UK veterinary profession is an integral part of the international scientific community using evidence and practical skills to further animal health and welfare, and public health.

Veterinary surgeons work across the economy, allowing strategically important economic sectors to operate successfully - this would be impossible without the contribution of EU vets. 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.”¹

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

The demand for veterinary surgeons is likely to increase following exit from the EU. 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.² 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 essential veterinary work continues.

Before the EU referendum, UK 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.

¹ Government Response to the House of Lords European Union Committee Report on Brexit: Farm Animal Welfare <http://www.parliament.uk/documents/lords-committees/eu-energy-environment-subcommittee/Brexit-farm-animal-welfare/Gov-Brexit-farm-anim.pdf>

² Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brexit-says-cvo/>

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 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.

VETERINARY CONTRIBUTION

The veterinary profession is diverse, with far-reaching influence and impact in many areas of political, economic and public life. Vets work in myriad settings, including in:

- ensuring food safety: protecting animal health, animal welfare, public health and public services, and enabling trade in animals and animal products;
- production animal clinical practice: providing preventive healthcare and treatment for livestock, as well as carrying out surveillance, promoting good biosecurity, boosting productivity
- achieving the Government's objective of maintaining and improving the UK's world leading standards of animal welfare;
- companion animal and equine practice: looking after pets, leisure and sport animals;
- vets in practice have a crucial role in scanning surveillance as the 'eyes and ears' of animal health and welfare, as well as detecting zoonotic infections, which are transmissible from animals to humans;
- universities: teaching the next generation of veterinary surgeons and producing world leading research
- abattoirs and throughout the food chain to secure public health, food safety and animal welfare;
- industry and technology ensuring the UK remains competitive; and
- government providing veterinary expertise to public policy making.

AGRICULTURE AND FOOD PRODUCTION

Official statistics put the value of UK livestock outputs at £12.7bn,³ not a penny of which could be realised without the input of a thriving, sustainable veterinary workforce. The role of veterinary surgeons in protecting animal health, welfare and public health is considered essential throughout the EU and underpins all trade, as well as providing assurances for domestic consumers.

Vets working within the production animal sector work closely with farmers to ensure biosecurity measures are implemented. Poor biosecurity can have devastating economic and social consequences. Animal disease outbreaks are a strategic risk on the National Risk Register.⁴ The Foot and Mouth outbreak in 2001, for example, is estimated to have cost £5

³ Defra, DAERA, Welsh Government, Scottish Government, *Agriculture in the United Kingdom 2016, 2017*

⁴ Cabinet Office, *National Risk Register of Civil Emergencies 2017, 2017*

billion to the private sector and £3billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed.⁵

EQUINE INDUSTRY

The equine industry in the UK is vibrant, valuable, and dependent on equine vets. The equine sector contributes £8bn a year to the economy and is the second largest rural employer after agriculture. There are over 1 million horses and ponies, 18,000 equine businesses and approximately 250,000 jobs in the equine sector. It is estimated that there are 4.3 million who ride and 11 million who have some interest in horses.⁶

AQUACULTURE

Aquaculture is of immense importance to the Scottish economy, thanks in large part to the efforts of fish vets. In 2015, aquaculture revenue in Scotland was estimated to be worth £1.86 billion annually to the economy and supported over 8,300 jobs.⁷

TRADE

Veterinary surgeons working in food hygiene and public health in the UK 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 health, food safety and animal welfare, is recognised as essential throughout the EU and by the World Health Organisation in a global context.

The value of trade in meat, dairy, eggs and fish is significant, and possible because of the input of vets. The below tables show the value of trade in food at 2016 prices.⁸

Exports:

Item	Value £ million
Meat	1 573
Dairy & eggs	1 371
Fish	1 639

Imports:

Item	Value £ million
Meat	6 215
Dairy & eggs	2 762
Fish	3 078

⁵ National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002

⁶ British Equestrian Trade Association (BETA), National *Equestrian Survey*, 2015.

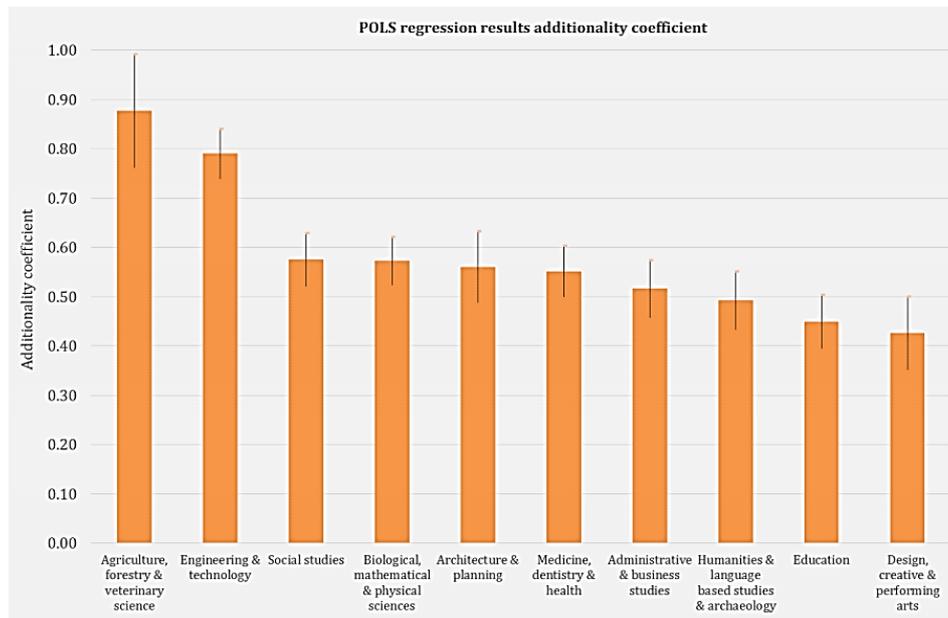
⁷ Scottish Salmon Producers Association, *Record year for salmon production*, 2015

<http://scottishsalmon.co.uk/record-year-for-salmon-production/>

⁸ Defra – Agriculture in the UK 2016, 2016

ACADEMIA AND RESEARCH

The UK's membership of the European Union has a "wide-ranging influence" on UK science and research.⁹ A report commissioned by the Department for Business, Innovation and Skills (BIS) found that in 2012/13 research and development income for veterinary science totalled £55m. Agriculture, forestry and veterinary science research is singularly adept at leveraging public sector funding to attract additional private sector finance that otherwise would not have occurred,¹⁰ as can be seen in the below graph.¹¹



Veterinary research is generating real world results. For example, it is estimated that the Bluetongue vaccination programme in 2008 has saved £460 million and 10,000 jobs in the UK, not to mention countless animal lives.¹² Our veterinary researchers are addressing some of the biggest social and economic problems of today, including:

- Inefficiencies in the food-chain;
- National food security, ensuring that indigenous food industries are competitive;
- Prevention of animal disease, zoonotic or otherwise;
- Antimicrobial resistance;
- Improving food animal welfare;
- Climate change, as food-producing animals are one of the great contributors to - and are impacted by - global warming;
- Conservation of wildlife;

⁹ Science and Technology Committee (Commons), *Leaving the EU: implications and opportunities for science and research*, 2016 <https://publications.parliament.uk/pa/cm201617/cmselect/cmsctech/502/50202.htm>

¹⁰ Department for Business, Innovation and Skills, *What is the relationship between public and private investment in R&D?* 2015 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/438763/bis-15-340-relationship-between-public-and-private-investment-in-R-D.pdf

¹¹ Department for Business, Innovation and Skills, *What is the relationship between public and private investment in R&D?* 2015, 215

¹² RCVS Research Subcommittee 2013 *Veterinary research in the UK: a snapshot*, 2013

- Improving companion animal and equine health and welfare.

COMPANION ANIMALS

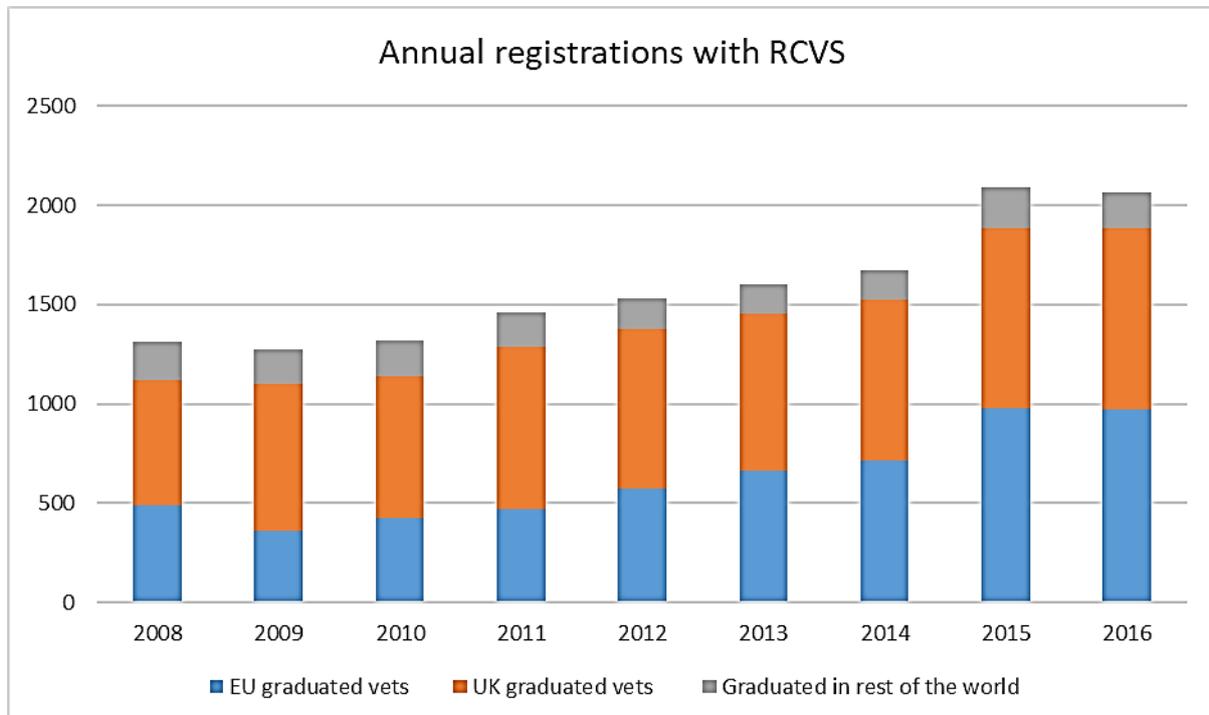
Estimates suggest that 12 million (44% of) UK households have pets and the pet population stands at around 54 million.¹³ Total spending on pets in the UK was estimated to be more than £4.6bn in 2015 based on Euromonitor data and has been growing steadily for many years. Total annual sales of veterinary medicines in the UK are estimated to be in the region of £695 million based on data from the National Office of Animal Health.¹⁴

The report, *Companion Animal Economics: The Economic Impact of Companion Animals in the UK*, examines both the direct and indirect benefits and costs of companion animals to society. The report concludes the annual turnover of the companion animal veterinary market in the UK was estimated to be £3 billion, with 3,621 businesses and more than 51,000 people employed.¹⁵

WORKFORCE RELIANCE ON EU VETS

The UK veterinary workforce is highly reliant on EU graduates. The ramifications of a loss of even a small percentage of the workforce would be great.

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% (RCVS, 2016).



¹³ The Pet Food Manufacturers' Association Pet Population 2017 <<https://www.pfma.org.uk/pet-population-2017>>

¹⁴ NOAH, Industry Facts and Figures <www.noah.co.uk/about/industry-facts-and-figures>

¹⁵ S Hall, *Companion Animal Economics: The Economic Impact of Companion Animals in the UK*, 2016 <<http://www.cabi.org/bookshop/book/9781786391728>>

PUBLIC HEALTH

Animal health is inextricably linked to public health. Zoonoses are infections or diseases that can be transmitted directly or indirectly between animals and humans, for instance by consuming contaminated foodstuffs or through contact with infected animals. The severity of these diseases in humans varies from mild symptoms to life-threatening conditions. Among emerging infectious diseases, 75% are zoonotic.¹⁶

EU veterinary surgeons make a particularly strong contribution to public health-critical roles. In the meat hygiene sector alone, some estimates suggest 95% of Official Veterinarians (OVs) working in abattoirs graduated overseas with the clear majority of these being non-UK EU graduates. The World Organisation for Animal Health (OIE) has emphasised the importance of the role of veterinary surgeons in abattoirs:¹⁷

“[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 zoonosis”

It then cites the detection of foot and mouth disease in an abattoir in 2001 as an illustration of the essential role of OVs:

“The fact that the first case detected during the foot and mouth disease epizootic in the United Kingdom in 2001 was in a pig abattoir clearly illustrates the relevance of this approach and the danger should it be called into question.”

Losing OVs 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.

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. This is likely to be the case whether UK trade with the EU is conducted under a Free Trade Agreement or under WTO rules. Any additional costs will be incurred over and above tariff-related costs.

¹⁶ Blancou J et al. *Emerging or re-emerging bacterial zoonoses: factors of emergence, surveillance and control*. *Veterinary Research*. 2005;36:507–522

¹⁷ World Organisation for Animal Health, *The role of the veterinarian at the abattoir* 2017.

<<http://www.oie.int/en/for-the-media/editorials/detail/article/the-role-of-the-veterinarian-at-the-abattoir/>>

Imports of animals or animal products 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 Official Veterinarian, 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 animal product has its own set of animal and public health requirements.

All products of animal origin imported from a third country are subjected to a documentary check—an assessment of the common veterinary entry document, public and animal health certificates, and accompanying commercial documentation. 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.

Consequently, post Brexit there will almost certainly be increased demand for veterinary certification and supervision. Currently, up to 30% of Official Veterinarians 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.¹⁸ Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

ACADEMIA AND RESEARCH

Researcher mobility is “of critical importance to the UK science community, including academia, business and charities”, and that “researcher mobility must be protected if UK science and research is to remain world-leading”.¹⁹ 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.²⁰ Without non-UK EU vets, there will not be enough appropriately qualified vets to meet workforce needs.

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%.

¹⁸ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brex-it-says-cvo/>

¹⁹ House of Lords, EU membership and UK science, Second report of the Science and Technology Committee, Session 2015–16, HL Paper 127
<<https://publications.parliament.uk/pa/ld201516/ldselect/ldscitech/127/127.pdf>>

²⁰ Veterinary Policy Research Foundation, 2016. Brexit - Veterinary Fact File. [Online]
Available at: <https://vprf.files.wordpress.com/2016/10/brexit-impacts-for-website.pdf>

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.²¹

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.²² 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.

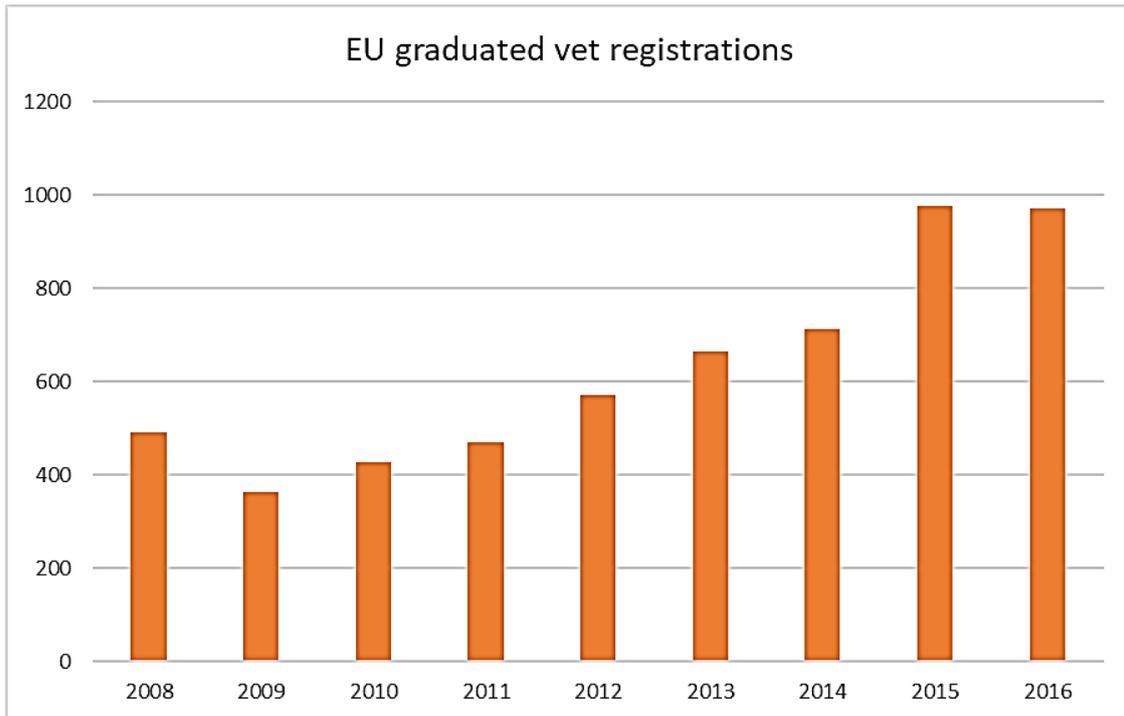
Following the decision that the UK should leave the EU, RCVS commissioned the Institute for Employment Studies (IES) to conduct three online surveys over a two-year period to gather the views and intentions of veterinary surgeons (VSSs) and veterinary nurses (VNs) registered to practise in the UK whose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

²¹ British Veterinary Association, *Voice of the Veterinary Profession (Voice) survey*, 2015

²² British Veterinary Association, *BVA Workforce Issues Survey*, 2017



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 2016 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.

At present, non-UK EU vets are faced with considerable uncertainty about their futures. We have called on the Government to guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

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 call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”²³

²³ House of Lords European Union Committee, *Brexit: farm animal welfare* 5th Report of Session 2017-19 - published 25 July 2017 <<https://publications.parliament.uk/pa/ld201719/ldselect/ldcom/15/1502.htm>>

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."²⁴

The government has stated that "high environmental and food standards will not be diminished or diluted as a result of leaving the EU or establishing free trade deals with other countries."²⁵ 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

EDUCATION

The UK has taken steps in recent years 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;²⁶ the first cohort of students will not graduate until 2019. At present the course not approved for RCVS membership purposes and this will be the case until 2019 when the first students complete their training. The Surrey veterinary school cost £45 million to establish.

Additional resource will be needed to expand capacity within UK veterinary schools. The costs per student for veterinary education are high compared to other teaching subjects. This is because of the wide range of clinical and professional skills they need to be equipped with at

²⁴Institute for Government, *Implementing Brexit: Customs*, (2017)

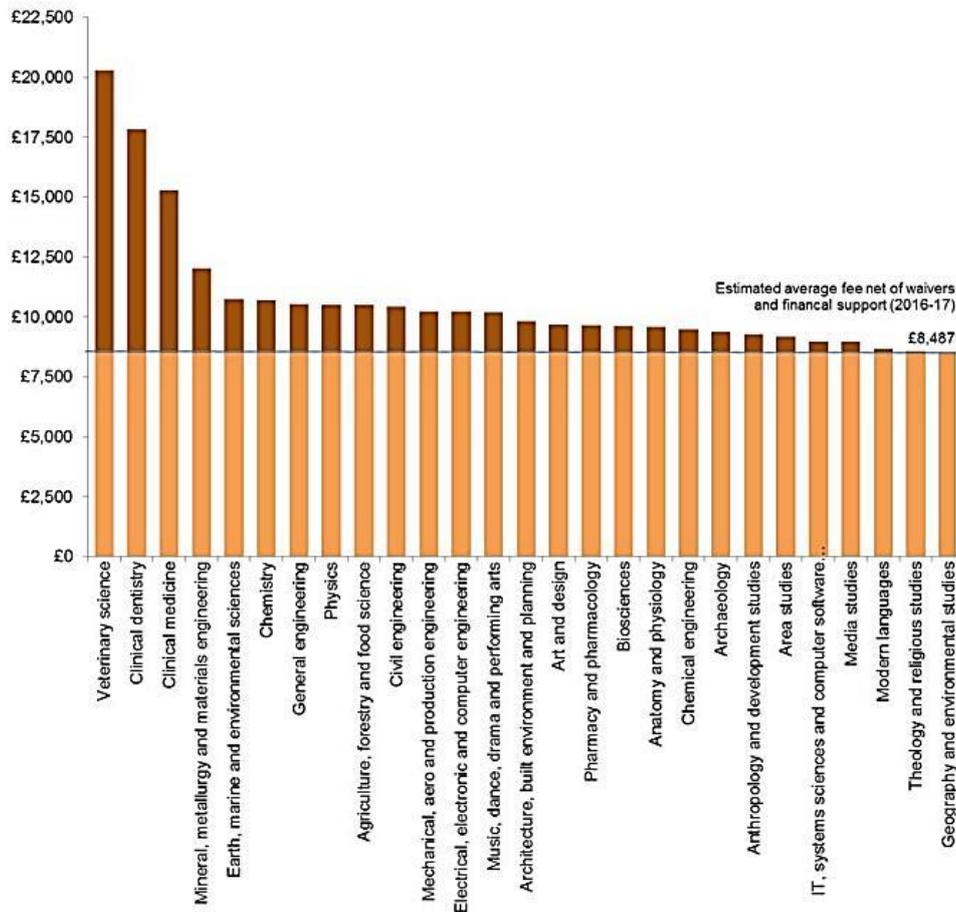
<https://www.instituteforgovernment.org.uk/sites/default/files/publications/IfG_Brexit_customs_WEB_0.pdf>

²⁵ George Eustice MP, Minister of State (Department for Environment, Food and Rural Affairs) July 2017
<<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2017-07-07/3647/>>

²⁶ University of Surrey, *New Veterinary School plans to embrace links between human and animal health*
Thursday 25 October 2012

<https://www.surrey.ac.uk/mediacentre/press/2012/92737_new_veterinary_school_plans_to_embrace_links_between_human_and_animal_health.htm>

graduation, as set out in the RCVS Day One Competencies.²⁷ The current cost of veterinary courses is estimated at £20,000 per student per annum.²⁸



This is more than the £9,000 covered by student fee plus the current support provided from the Higher Funding Council for England (HEFCE) or similar funding levels provided by the Scottish Funding Council (SFC). 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.

As noted above, 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. There are therefore difficulties in recruiting appropriately qualified and skilled staff from the UK to fill the roles that would be needed as this would require significant change in behaviour of UK graduated vets and / or potential financial incentives to persuade them to move from private practice. Movement from public sector posts into academia would be likely to increase the shortage problem in that area.

²⁷ Royal College of Veterinary Surgeons, *RCVS Day One Competences*, 2014

²⁸ 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)

Extra-mural studies (EMS) are formal placements taken throughout the veterinary medicine degree. The purpose of EMS is to provide students with real-life experience in a range of areas, from animal handling and working with clients in the hospital setting to gaining an understanding of the ethical and legal responsibilities required of the veterinary surgeon. They are an essential part of veterinary education. Current regulations set a minimum of 38 weeks of EMS during the course. This typically breaks down into 12 weeks on pre-clinical placements and 26 weeks of clinical placements. A large and rapid expansion in student numbers may see EMS placements become a pinch point, as capacity within veterinary practice is limited.

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 veterinary schools in other EU countries place a greater emphasis on public health critical work through the veterinary degree and on the role of the OV. Students at UK veterinary schools do not demonstrate the same level of interest in meat hygiene work, with only 6% of students expressing an interest in “government work”.²⁹ Within the public service workforce, the Veterinary Public Health Association estimates that only 4% of OVs are UK or Commonwealth graduates.

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*³⁰ 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*,³¹ 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.

ADMINISTRATIVE CAPACITY

An expansion of the current limited use of a visa based system is likely to be expensive, time-consuming, bureaucratic and frustrating especially for small and medium sized enterprises (SMEs). 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

²⁹ BVA, RCVS *Vet Futures – Taking charge of our future*, 2015

<<https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>>

³⁰ BVA, RCVS *Vet Futures – Taking charge of our future*, 2015

<<https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>>

³¹ BVA, RCVS *Vet Futures Action Plan 2016-2020*, 2016

<[https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016\(5\).pdf](https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf)>

practices. Veterinary practices, share characteristics noted by the Federation of Small Businesses:

“Although one in four (24%) small employers have at least one non-UK worker, the use of the tier points-based visa system is low. Ninety-five per cent of small employers have never made use of the UK’s points-based immigration system to meet their business’ labour and skills needs. Where small businesses have used visas, the most commonly used visas are the Tier 2, at three per cent, and the Tier 1, at two per cent. When respondents were asked why they had not engaged with the points based immigration system, the most common response was that their labour and skill needs were met through the UK and EU labour markets (70%).”³²

The new immigration system for EU citizens should also allow for transfers between employers once an EU worker is in the UK.

OUR CALLS

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 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.

³² Federation of Small Businesses (FSB), *A Skilful Exit: What firms want from Brexit*, 2017
<https://www.fsb.org.uk/docs/default-source/fsb-org-uk/a-skilful-exit---what-small-firms-want-from-brexit.pdf?sfvrsn=0>