Northern Ireland Affairs Committee: The land border between Northern Ireland and Ireland. British Veterinary Association Northern Ireland Branch: Written Submission

1 BRITISH VETERINARY ASSOCIATION AND NORTHERN IRELAND BRANCH

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

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.

2 INTRODUCTION

BVA welcomes the opportunity to respond to this inquiry on the challenges facing Northern Ireland as a result of Brexit. 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 vets, farmers, and pet owners who may wish to cross the border with their animals.

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.

Northern Ireland has large rural areas which rely heavily on a local social and economic network of agriculture, food production and related sectors including the veterinary profession. Veterinary surgeons play a crucial role in helping to build strong communities and supporting Northern Ireland’s agricultural industry, which is the cornerstone of the local economy.

Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the European Union (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.”

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1Department for Exiting the European Union, Northern Ireland and Ireland Position Paper, 2017
2House of Commons Library, Briefing Paper Number 8065, 1 August 2017 Importance of trade with
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.


“In order to ensure continuity in relation to our trade around the world and avoid disruption for business and other stakeholders, the UK needs to prepare ahead of its exit from the EU for all possible outcomes of negotiations and to ensure that we have the necessary legal powers and structures to enable us to operate a fully functioning trade policy after our withdrawal from the EU.”

For the Government to implement this approach, 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 work collaboratively with private practitioners in Northern Ireland. Based on the outcome of this effective working relationship, 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 health, food safety and animal welfare, is therefore recognised as essential throughout the EU and around the world.

The demand of veterinary certification is increasing and will grow significantly following exit from the EU. Nigel Gibbens, Chief Veterinary Officer UK, has suggested that this could lead to the volume of products requiring veterinary export health certification increasing by as much as by 325% in the event of no deal being reached between the EU and UK.

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, and this applies to Northern Ireland as much as anywhere else in the UK. The NI veterinary workforce is heavily dependent on EU vets, potentially even more so than the rest of the UK due to the large numbers of vets who qualify from the Republic of Ireland. Therefore, the Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union or from outside the EU, to ensure this essential veterinary work continues.

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3 Irish Farmers’ Association, *Brexit: The Imperatives for Irish Farmers & the Agri-Food Sector* 2016
4 Department for International Trade, *Preparing for our future UK trade*, 2017


3 VETERINARY CERTIFICATION

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.

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. They include:

- fresh red meat, white meat, game and offal
- meat products (e.g. cured meats, cooked meats)
- 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
- milk and milk products
- eggs and egg products
- honey
- semen, embryos, ova
- manure, blood and blood products
- bones, bone products and gelatine
- hides and skins
- bristles, wool, hair and leathers
- hay and straw
- hunting trophies, i.e. animal heads and skins
- insect pupae

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.

There is significant trade in Animal By-Products (ABP) between Northern Ireland and the Republic of Ireland. As an example, Northern Ireland exports a significant quantity of unprocessed poultry manure as there is insufficient arable land or specialist facilities to process. At present, this trade operates in accordance with Article 48 of EU Regulation 1069/2009.

OVs certify and supervise the import and export of live animals and other animal products to and from third countries ensuring smooth trade. 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.”

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.

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. 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.

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 product has its own set of animal and public health requirements.

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. 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 be increased demand for veterinary certification and supervision. The scale of this increase is uncertain. However, Nigel Gibbens, Chief Veterinary Officer UK, has 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.

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4 CAPACITY TO MEET VETERINARY CERTIFICATION

Fulfilling demand for veterinary surgeons, following the departure of the UK from the EU will be essential to maintain 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.

The Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union 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.”

Statistics provided by the Royal College of Veterinary Surgeons (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.

According to RCVS, of the 794 vets practising in Northern Ireland, 390 graduated elsewhere in the EU. This includes vets who graduated from University College Dublin, in the Republic of Ireland, which is often an attractive option for students from NI, where there is currently no vet school.

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8 Information provided by Royal College of Veterinary Surgeons
EU veterinary surgeons make a particularly strong contribution to public health-critical roles, who are indispensable for trading purposes. Estimates suggest 95% of Official Veterinarians (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.

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.

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.”9

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 guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

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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.

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.”

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.

5 Veterinary Medicines

To protect animal and public health there must be access to medicines for the treatment of animals that meet standards that ensure safety, quality and efficacy. Therefore, the Government should guarantee the UK veterinary profession has ongoing access to all existing and future veterinary medicines licensed through the EU regulatory systems and existing import certificate mechanisms.

Currently, there are three channels for the authorisation of veterinary medicines in the UK. Firstly, there is national authorisation by the Veterinary Medicines Directorate (VMD) when an applicant has applied to the UK only, and has no desire or intention to license and commercialise the product in any other Member State. The second is the centralised procedure, under which an applicant submits a dossier to the European Medicines Agency (EMA) and a product is then licensed for use throughout the EU. Thirdly, the mutual recognition or decentralised procedure by which an applicant submits a dossier to one Member State which undertakes the authorisation. In this third procedure, other Member States may approve the product by mutual recognition of the original marketing authorisation.

Available estimates suggest 30,000 people are cross-border workers. This includes a significant number of veterinary surgeons with practices straddling the border. Harmonised regulation of medicines has provided certainty to these vets in their work on either side of the border.

The UK’s exit from the EU veterinary medicines approval system means the market for English-language labelling and data information within the EU will shrink, which could have a knock-on effect for those EU countries, including the Republic of Ireland, that heavily rely on licensing and packaging with the UK.

BVA has been calling on the UK Government to guarantee that the UK veterinary profession has ongoing access to all existing and future veterinary medicines licensed through the EU regulatory systems and existing import certificate mechanisms. The UK Government should seek to maintain the link with the current EU veterinary medicine approval systems.

6  PET TRAVEL

At present, The Pets Travel Scheme (PETS) is in operation. This means that with a Pet Passport companion animals (cats, dogs and ferrets) can re-enter the UK from the EU without having to be quarantined. In theory, this applies to movements of pets between Northern Ireland and the Republic of Ireland. In practice, the requirement for a Pet Passport to visit the Republic of Ireland has often not been enforced.

Currently, there is uncertainty about the future of the PETS scheme when the UK departs the EU. The UK may be required to become a listed country or the EU could continue to recognise UK pet passports in the same way it does for Switzerland, Norway, Andorra and others. Alternatively, owners may be required to get a new UK passport or third country certification before travelling with their pet.

BVA has asked that consideration be given to the status of the UK for the purposes of the Pet Travel Scheme to facilitate a smooth transition from day zero post-Brexit. The particular circumstances of Northern Ireland as the only part of the UK to share a land border with the EU, must be considered within this, and an appropriate balance found between protecting against disease incursion and the cross-border puppy trade, and facilitating the legal movement of owners with their dogs.

CONCLUSION

Official Veterinarians working on farms, food premises and other places carry out official controls (inspection and audit). Across the UK, including Northern Ireland, OVs work collaboratively with local private practitioners. Based on the outcome of this effective working relationship veterinarians, according to the 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 Northern Ireland, the UK, EU and around the world.

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.

To protect animal and public health there must be access to medicines for the treatment of animals any new trade deal with the EU should maintain the link with EU veterinary medicine approval systems.

Consideration needs to be given to the status of the UK for the purposes of the Pet Travel Scheme to facilitate a smooth transition from day zero post-Brexit. The particular circumstances of Northern Ireland as the only part of the UK to share a land border with the EU, must be considered within this.