Welsh Affairs Committee: Brexit: Agriculture, Trade and repatriation of powers inquiry
British Veterinary Association Welsh Branch: Written Submission

1 INTRODUCTION

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 Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

We welcome the opportunity to respond to this inquiry on the challenges facing agricultural trade in Wales post-Brexit. 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.”

Wales has large rural areas of low population density which rely heavily on a local social and economic network of agriculture, food production and related sectors including the veterinary profession. Wales is one of the only areas of the UK - alongside Cornwall - to receive ongoing funding from the European Union to support deprived communities. In 2014, structural funds to Wales to help support jobs and services in towns, for example, together with direct payments to farmers under the Common Agricultural Policy (CAP) amounted to £658million. Vets play a crucial role in helping to build strong communities and supporting Wales’ agricultural industry, which is the cornerstone of the Welsh economy.

Agricultural policy in the UK is devolved, yet the UK has been able to maintain a degree of coherence to agricultural policy amongst all four administrations. Brexit presents an opportunity to tailor agricultural policy to suit the respective regions of the UK, however coordination and oversight on matters of animal health is crucial.

The Government White Paper, Preparing for our future UK trade, published by the Department for International Trade states the following approach to trade.

1 House of Commons Library, Briefing Paper Number 8065, 1 August 2017 Importance of trade with the EU for UK industries file:///C:/Users/michaelm/Downloads/CBP-8065.pdf
“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 international trade must be recognised and supported.

Veterinary surgeons working as official controllers at farms, food premises and other settings in Wales carry out official controls (inspection and audit). These Official Veterinarians (OVs) work collaboratively with private practitioners in Wales. 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 Wales as much as anywhere else in the UK. 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.

High UK animal welfare, animal health and public health (including food safety) standards should not be undermined by cheaper imports produced to lower standards. As public goods, the UK should prioritise the maintenance of these standards in all trade negotiations.

Leaving the EU may offer opportunities not enjoyed by being a member of trading bloc. Where opportunities are present to improve standards in accordance with evidence-based risk analysis of animal health, public health, welfare and ethics, these should be seized. Any actual or perceived risks and threats should be approached, in the same rational way, and mitigated to minimise the risks for UK farming, food industry, animal welfare and consumer interests.

2 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.

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3 Department for International Trade, *Preparing for our future UK trade*, 2017
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.

Official Veterinarians certify and supervise the import and export of live animals and other animal products to and from third countries ensuring smooth trade. Veterinary surgeons 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.

3 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.

Currently, of the 1,038 vets working in Wales, almost a quarter are EU-graduates.

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7 Information provided by Royal College of Veterinary Surgeons

8 Figures of EU graduated vets currently practising in Wales provided by the RCVS on 8 February 2017 RCVS, 2015. RCVS Facts. [Online] Available at: file:///C:/Users/Amyw/Downloads/rcvsfacts2015.pdf [Accessed 7 June 2017]
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.

Last year, the total value of all exports was £15.9 billion, up £2,391 million compared to the previous year. Access to the EU market is a specific concern for Wales- exports to the EU accounted for 67.4% of Welsh exports compared to 49% for the UK as a whole. Agricultural produce makes a sizeable contribution towards Welsh exports. With almost three times as many sheep per hectare of agricultural holdings compared to other countries of the UK, there is a large market for Welsh products, such as Welsh lamb, at home as well as a thriving export market.

The income from exports of lamb allow sheep farms in Wales to continue to play an important role in an environment and landscape that is uniquely Wales. Any threat to these farms, particularly smaller farms which are already marginal, via loss of export income could have far reaching consequences for Wales’ natural environment, as well as the viability of private veterinary practice in rural areas.

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.”

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.

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.

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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.

4 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

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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. Any new trade deal should maintain the link with the current EU veterinary medicine approval systems.

5 OBJECTIVES FOR FUTURE TRADE DEALS

The UK should prioritise the maintenance of animal health and welfare standards in all trade negotiations to develop a unique, high standard of animal health, welfare and public health (including food safety) as a selling point for the UK. Where opportunities exist to improve standards in accordance with evidence-based risk analysis of animal health, welfare and ethics, these should be seized.

The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets to avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards.

A. ANIMAL WELFARE

Animal welfare is a global concern amongst other pressing concerns including climate change, biodiversity loss, antimicrobial resistance and food security for a growing human population. Ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives. The UK must promote good animal welfare as an important sustainable development goal. Trade acts as a means to achieving this.

Post Brexit, maintaining consistency in welfare standards across the devolved regions of the UK could also pose a challenge. Standards may diverge and this could have a detrimental impact on animal welfare as well as the disease risk and response capability for the UK. Our overarching call is therefore for the four parts of the UK to continue to work together for the good of animal health and welfare, and public health

UK citizens place value in the welfare of farmed animals. In a recent survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of animals. However future trade deals may undermine these values. The House of Lords European Union Committee noted the “greatest threat to farm animal welfare standards post-Brexit would come from UK farmers competing against cheap, imported food from countries that produce to lower standards than the UK.”

To ensure domestic animal welfare standards and to support animal welfare globally the Government must secure the inclusion of high farm animal welfare standards in the trade agreements it negotiates.

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Where opportunities are available to improve the welfare of farmed animals, these should be considered in all future trade deals.

B. **ANIMAL HEALTH**

Protecting animal health through standards and surveillance must be an objective of any further trade policy, to effectively detect, respond to, and prevent outbreaks of disease in animal populations. Outbreaks can have immense social and economic consequences. The Foot and Mouth outbreak in 2001 is estimated to have cost £5 billion to the private sector and £3 billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed. In Wales, there were 117 infected premises; controlling the outbreak not only seriously affected farming communities directly but had a huge impact on rural tourism and Welsh rural incomes.

Trade and animal movements across the borders of the UK are likely to remain hugely important for the whole UK economy; diseases do not respect political borders meaning that shared surveillance will continue to be a priority; and it is imperative that animal welfare regulations do not simply export poor welfare. For all of these reasons, structures should be put in place to ensure ongoing cooperation and collaboration.

The UK Government should ensure that trade deals, in respect of animals and animal products, take account of already agreed protocols such as those applied by the EU or the OIE and are backed by appropriate veterinary certification.

Most pathogens, particularly in animal products, cannot be practically detected during border checks. This is because checks at the border are insufficiently sensitive to detect risk. Future trade deals should emphasise checks at the point of production, where they are more effective.

C. **PUBLIC HEALTH INCLUDING FOOD SAFETY**

Animal health is inextricably linked to human 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.

To protect public health the safety of animals and animal products must be prioritised in trade deals. It is imperative that standards are maintained from farm to fork and veterinary inspection is central to that.

D. **ANTIMICROBIAL RESISTANCE**

The UK Government has demonstrated strong leadership at home and globally in tackling the issue of antimicrobial resistance. Thanks to these efforts, action has been taken at all levels, at the United Nations; within the EU and domestically. As the forward to the UK Five Year Antimicrobial Resistance Strategy 2013 to 2018 notes:


“There are few public health issues of greater importance than antimicrobial resistance (AMR) in terms of impact on society. This problem is not restricted to the UK. It concerns the entire world and requires action at local, national and global level.”

Encouraged by the publication of the O’Neill Review on Antimicrobial Resistance, the UK agricultural and food industry has taken steps to further the responsible use of antimicrobials. BVA is a member of the Responsible Use of Medicines in Agriculture (RUMA) alliance. RUMA launched sector specific targets for antimicrobial use on 27 October 2017. UK veterinary sales data show the industry is already acting with reductions in sales of critically important antimicrobials.

Responsible farm antimicrobial use must be incorporated into future trade deals to ensure progress on responsible antimicrobial use is not undermined.

6 CONCLUSION

Veterinary surgeons working as official controllers at farms, food premises and other places carry out official controls (inspection and audit). Across the UK, including Wales, these Official Veterinarians 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 Wales, the UK, EU and around the world.

Following exit from the EU, the UK will likely 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.

Any future trade deals should have the following objectives, animal health, animal welfare, public health and food safety and not undercut the leadership of the UK Government at home and abroad in addressing the issue of anti-microbial resistance. The value of EU exports and EU funding to the rural environment in Wales means that any trade deal may have proportionately greater socio-economic effects in Wales than elsewhere in the UK.