

# BVA No-deal Brexit planning table September 2019

Veterinary workforce		
Key point	Update	Remaining concerns
<p>1) The UK veterinary workforce is heavily reliant on EU graduates, particularly in the field of public health.</p>	<p>As Home Secretary, <a href="#">Sajid Javid announced</a> in July that vets will be added to the Shortage Occupation List in Autumn when changes are made to the Immigration Rules.</p>	<p>Is government confident that we have the necessary veterinary workforce to meet the additional demands associated with Brexit (trade, pet travel, equine movements)?</p>
<p>2) A no deal Brexit would place additional demand on veterinary capacity, particularly in relation to a significant increase in veterinary certification required for trade, and other animal movements including pet travel and equines.</p>	<p>EU Settlement Scheme opened on 30 March 2019. Covers EEA and Swiss citizens, and their family members who are in the UK. The deadline for applications is 30 June 2021.</p> <p><a href="#">19 August Government announcement</a> that free movement will end on 31<sup>st</sup> October- instead of previous transition. This was followed by a "<a href="#">U-turn over plan to end freedom of movement on 31 October.</a>"</p> <p>This provides confusion. If free movement ended abruptly, before the settled status scheme ran its course, EU vets in the UK will have no way to prove they have right to live and work in UK. Ending free movement would also stymie the flow of EU vets into the UK.</p> <p>Home Office clarification issued on 4 September: <a href="#">Government announces immigration plans for no deal Brexit</a></p> <p>Home Office updated 5 September- <a href="#">Guidance for employers on carrying out right to work checks on EU, EEA and Swiss citizens and their family members in the UK after Brexit.</a></p> <p>In January 2019, the Government stated that in the event of a no deal Brexit, EEA nationals arriving in the UK after exit day who intend to stay for longer than three months would have to apply for European Temporary Leave to Remain (ETLR). This transitional system. Recent developments have cast doubt on whether ETLR will come into effect at all.</p>	<p>Can the government provide clarity to the veterinary profession on future immigration system plans?</p> <p>Does the Home Office have the capacity to register over two million EU nationals who are already in the UK by the end of December 2020, if the UK leaves the EU without a deal?</p> <p>Can the EU settlement scheme can cope with any significant surges in application numbers in the lead up to Brexit?</p> <p>What will happen to EU nationals, including highly skilled vets working in the UK, if they do not apply to the EU Settlement Scheme by 31st December 2020?</p> <p>What plans do you have to increase communication with EU nationals throughout the implementation of the EU Settlement Scheme?</p> <p>Can the Home Secretary guarantee the EU Settlement Scheme App will be available on Apple devices?</p>

## BVA No-deal Brexit planning table September 2019

		<p>When is the Home Office going to issue guidance on the ETLR immigration system for prospective migrants to the UK and employers?</p> <p>If the ETLR is overhauled, what system will likely take its place, and what communication strategy has the government put in place to inform employers and EU nationals of this?</p>
<p>3) Under the Mutual Recognition of Professional Qualifications Directive (MRPQ) EEA qualified vets have the automatic right to register with the RCVS to practice in the UK. In turn, UK vets have the right to live, register and work elsewhere in the EU. This removes the administrative, cost and time barrier of the RCVS statutory exam.</p>	<p>The UK Government issued a <a href="#">no deal advice</a> on the general issue of professional qualifications. The EU <a href="#">Commission has released a no deal notice too</a></p> <p>Qualifications already recognised by the RCVS will continue to be recognised. UK qualifications already recognised in EU member states will continue also.</p> <p>On Wednesday 6 February, the House of Lords passed The Veterinary Surgeons and Animal Welfare (Amendment) (EU Exit) Regulations 2019 to allow <a href="#">RCVS</a> to continue to register veterinary surgeons from the European Economic Area (EEA) after the UK leaves the European Union.</p> <p>The key part of the amendment was that RCVS would, after the UK exits the EU, be able to introduce the Statutory Examination for Membership for EEA and Swiss nationals where they hold a degree that does not meet RCVS educational requirements and standards- i.e. an EAEVE accredited course.</p>	<p>Has the RCVS put in place the required processes to recognise EAEVE accredited qualifications?</p> <p>How will vets who work on either side of the Irish land border be affected?</p>

## BVA No-deal Brexit planning table September 2019

Animal health		
Key point	Update	Remaining concerns
4) The UK would lose access to the EU disease surveillance system ADNS (the Animal Disease Notification System).	UK will have continued access to WAHIS through OIE.  ADNS access could be negotiated outside the EU (certain third countries have access).	Will the UK have a surveillance system that will allow us to prepare for exotic disease without ADNS access?
5) The UK could initially become an “unlisted third country” meaning pets would require additional veterinary certification to enter the EU.	Listing from the EU Commission is not anticipated prior to 31 <sup>st</sup> October, or soon after.  Pet travel issues will be very visible and affect members of the public directly. Meaning the risk attached is high. Defra <a href="#">campaign</a> to raise awareness of additional time and cost requirements for pet owners.  BVA Voice statistics from February 2019:  85% of companion animal vets have been approached in the previous 3 months by pet owners seeking guidance about pet travel in the event of a no deal Brexit. 39% claimed to have experienced a significant increase in enquiries. 17% of those vets who had been asked about pet travel in the event of a no deal Brexit felt that they could answer all their clients’ questions. Several commented that they were unable to provide definitive advice to those planning to travel, particularly around the need for additional rabies vaccinations and blood tests.	With autumn half term and the Christmas travel season approaching how much disruption will there be for pet owners to travel to the EU?
6) As an “unlisted third country”, no movement of horses would be permitted from the UK to the EU and the existing Tripartite Agreement would no longer be valid. Export Health Certificates would be required on a permanent or temporary basis.	<a href="#">UK listing</a> agreed in April covers horses. However, a new application would be required ahead of 31 <sup>st</sup> October. UK was unanimously agreed by Standing Committee on Plants, Animals, Food and Feed in April, and would expect to meet the requirements again at our next attempt.  That should be at a SCOPAFF meeting ahead of October 31st- but will probably be close to that date- cannot be confirmed yet. Standing Committee on Plants, Animals, Food and Feed meetings	Will the UK be listed ahead of Brexit for the movements of horses to the EU?  What will happen to horse movements across the Irish land border where these are economically significant?

## BVA No-deal Brexit planning table September 2019

	<p><a href="#">schedule</a> suggests meeting will be held: 24-25 September, 24-25 October.</p> <p>Even if listed, <a href="#">additional tests and certification</a> would be required, with time needed to undertake these. Horses would be required to enter the EU through a Border Inspection Post. No post exists on Irish land border or north coast of France (<a href="#">Calais is constructing a BIP</a>- though not yet recognised in <a href="#">EU Commission list</a>). Current EU BIPs on the channel include: Rotterdam, Ostend.</p> <p>BVA Voice statistics from February 2019:</p> <p>26% of production animal and equine vets have been approached by clients in the previous 3 months for guidance about farm animal exports or horse movements in the event of a no deal Brexit.</p> <p>Of the 40-production animal and equine vets surveyed who had been asked for guidance on farm animal exports or horse movements in a no deal scenario, just one (3%) felt able to answer all the questions their clients posed and a further five (13%) could answer most of their clients' questions. However, half of those who had been approached (20 vets, 50%) said they could only answer some of their clients' questions and around one in three could not help at all (14 vets, 35%).</p>	
--	---	--

## BVA No-deal Brexit planning table September 2019

Animal welfare		
Key point	Update	Remaining concerns
7) To maintain the UK's existing animal welfare standards, Defra will be required to pass EU-derived animal welfare legislation into UK law. However, the National Audit Office states: "In a no deal scenario, there is a high risk that Defra will be unable to deliver all the Statutory Instruments it needs in time."	<p>Several Statutory Instruments have been passed (with input from BVA to parliamentarians).</p> <p>Uncertain if all <a href="#">sifting</a> of SIs including Defra SIs relating to animal health/ welfare and trade has been completed.</p> <p>Unable to ascertain how many were likely to be needed as numbers were constantly changing as SIs were grouped etc.</p>	Will the statute book be ready for Brexit?
8) The principle of animal sentience is not captured within the bounds of the Withdrawal Act.	<p>Uncertainty about where/ if the principle will be enshrined in UK law. <a href="#">Theresa Villiers statement from 2017</a></p> <p><a href="#">Guardian report November 2017</a>: Michael Gove has promised to make "any necessary changes" to UK law to recognise that animals can feel pain, after a social media campaign accused Conservative MPs of voting down proposals to accept, they are sentient beings.</p> <p><a href="#">Lord Gardiner</a> during Wild Animals in Circuses (No. 2) Bill - Second Reading on 19th June 2019 "we have been clear that we will introduce our animal sentience proposals <i>after we leave the EU</i>."</p> <p>Zac Goldsmith made comments on sentience in the HoC on 3rd September. At #BetterDealForAnimals reception he made commitment that government will find "earliest possible legislative hook to introduce principle of sentience" and that "our laws here will be stronger than anywhere else in the world"</p>	<p>When will animal sentience be legislated for?</p> <p>What legislative vehicle will be utilised?</p>
Food hygiene and safety		
Key point	Update	Remaining concerns
9) The UK will continue to be able to access reports by the European Food Safety Authority (EFSA) on	<p><a href="#">FSA Annual Report 2018/19</a> states:</p> <p>"The FSA established and delivered a formal programme of activity</p>	Does FSA have the capacity to undertake the same risk assessment role of EFSA?

## BVA No-deal Brexit planning table September 2019

<p>risk assessment regarding food safety, but UK authorities would no longer be able to input to this work and future EFSA reports would not include UK data.</p>	<p>to manage response to exit. The programme’s scope focussed on Day 1 readiness and then a transition to the longer term, more stable position that allows us to maximise on opportunities. These included recruiting and training additional staff to take on responsibilities to be repatriated from EU, necessary amendments to legislation to ensure a functioning body of law on exit day, changes to processes to take account of loss of access to key systems. The FSA also secured an additional £14m in 2018/19 and £16m for 2019/20 to support delivery.”</p>	<p>What will the consequences be if FSA and EFSA make conflicting decisions?</p>
<p>10) Concerns about the veterinary workforce (Official Veterinarians) in UK abattoirs, 95% of whom are non-UK graduates, will be exacerbated. As a result, there are concerns abattoirs will be unable to operate at current volumes in a no deal scenario.</p> <p>11) This could have knock on effects on farms. If livestock is unable to move to an abattoir there this can lead to overstocking occurring on farms resulting in detrimental effects on animal welfare and health.</p>	<p>General workforce issues raised above.</p> <p>Reports from July 2019, if <a href="#">no deal is reached</a> there are the government will buy slaughtered livestock at set prices to prop up demand that will collapse in Europe because of high tariffs.</p> <p>A guaranteed purchaser does not incentive farms to make changes or reduce production. This would maintain demands on abattoirs which do not have the required veterinary workforce- thus overstocking would continue?</p>	<p>What communications have been made to farmers on contingency plans for loss of markets?</p> <p>How long will contingency plans be in place?</p> <p>Will there be overstocking on farms?</p> <p>Will there be capacity to store unsold meat?</p> <p>Is there a guarantee that (animal health, welfare, public health) standards in slaughterhouses will not be lowered (e.g. continued requirement for OV) to ensure throughput?</p>

## BVA No-deal Brexit planning table September 2019

Veterinary medicines		
Key point	Update	Remaining concerns
12) Veterinary medicines that have been previously authorised for veterinary use in the UK by the European Medicines Agency (EMA) will remain authorised.	Existing authorisations should continue.  As yet unanswered PQs asked by Chuka Umunna (Streatham) Asked on: 22 July 2019 Department for Environment, Food and Rural Affairs Veterinary Medicine: Drugs280341	In longer term, will new medicines gain UK authorisations as quickly?  Will VMD have the additional capacity to undertake new authorisations?
13) Veterinary medicines authorised for veterinary use by regulators in another EU Member State are authorised for use in the UK through mutual recognition. In a no deal scenario the use of these drugs in the UK is allowed via a national authorisation.	To ask the Secretary of State for Environment, Food and Rural Affairs, what parts of the Government's plan for registration of veterinary medicines in the event of a no deal Brexit have been implemented.  Department for Environment, Food and Rural Affairs Veterinary Medicine: Drugs280342 To ask the Secretary of State for Environment, Food and Rural Affairs, what parts of the Government's plan for regulation of veterinary medicines in the event of a no deal Brexit have been implemented.  <a href="#">Food and Drink, Veterinary Medicines and Residues (Amendment etc.) (EU Exit) Regulations 2019</a> We welcomed provisions within the SI which ensure veterinary medicines that hold an EU marketing authorisation will be converted into a UK authorisation. This is a sensible move to ensure continued legal certainty and access for vets and the farmers and pet owners they work with.	
14) Mutual recognition of batch testing would cease if the UK leaves the EU under no deal, meaning additional checks for veterinary medicines manufactured in the UK and exported to the EU.	UK will not require additional checks on medicines entering the UK. There will be a requirement for batch testing on medicines leaving UK into EU.  This could also impact on supply chains that crisscross the EU and UK- thereby affecting supply.	Additional red tape for UK exporters creates incentives to move production into EU - what will the impact be on vets in industry in UK?
15) Existing Maximum Residue Limits (MRLs) for food safety would	SI will ensure UK MRLs will be the same as the EU, on day one.	Is there potential for diverging MRLs across UK jurisdictions?

## BVA No-deal Brexit planning table September 2019

<p>become UK law via the EU Withdrawal Act. There is no guarantee that this harmonisation would continue in future, which would place a barrier to trade with the EU in future.</p>	<p>Going forward this could change. There were unconfirmed <a href="#">reports in March 2019</a> that the UK would offer a political guarantee to unilaterally follow all European Union food safety and animal health regulations for at least nine months in the event of a 'no deal' Brexit, to protect British farming. This was unconfirmed. Any harmonisation would require EU recognition to remove the requirement for border checks.</p>	<p>Is there potential for diverging MRLs between NI and Ireland creating confusion for vets working on either side of the land border?</p>
<p>16) Delays at ports leading to shortages of veterinary medicines.</p>	<p>August 2019, the Yellowhammer <a href="#">reporting in the Sunday Times</a> had a specific section on vet medicines that is worth reading:          “ii) Any disruption that reduces, delays or stops the supply of medicines for UK veterinary use would reduce our ability to prevent and control disease outbreaks, with potential harm to animal health and welfare, the environment and wider food safety and availability, as well as, in the case of zoonotic diseases, posing a risk to human health. <b>Industry stockpiling will not be able to match the 4-12 weeks’ stockpiling that took place in March 2019. Air freight capacity and the special import scheme are not a financially viable way to mitigate risks associated with veterinary medicine availability issues.</b>”          Veterinary medicines are confirmed as Category 1 listed, meaning that, in the event of any disruption at the border, veterinary medicines will be amongst the goods prioritised.</p> <p>The government fund includes £434 million made available to help ensure continuity of vital medicines and medical products. This announcement follows a commitment from the PM to spend up to £300 million on extra freight capacity to keep vital goods moving after a no-deal Brexit.  <a href="#">Doctors' letter warns PM over medicine supplies and flu after Brexit</a></p> <p><a href="#">VMD EU Exit Information Hub</a></p> <p><a href="#">Joint statement</a> from Veterinary Medicines Directorate and National Office of Animal Health Planning Feb 2019          “To reduce any risk to medicines availability in the UK, detailed</p>	<p>What medicines are most at risk of shortages?</p> <p>How will this be felt across small animal, large animal, equine practice?</p> <p>Where shortages occur as a result of production issues, unrelated to Brexit, will there be a need to clarify this?</p>

## BVA No-deal Brexit planning table September 2019

	<p>planning is ongoing to ensure that supply chain measures are appropriate to address the sector's complex needs and priorities.”</p> <p>BVA Voice statistics from February 2019:</p> <p>Around one in four vets working in clinical practice (28%) have been asked by clients in the last three months whether Brexit will affect the supply of veterinary medicines; most of these had been asked on more than one occasion in the last three months, with some having been asked many times (an average of around five times each amongst those who had received any enquiries of this nature). Extrapolated across all vets working in clinical practice, this equates to around 1.5 such enquiries per vet in the last three months.</p>	
--	--	--

## BVA No-deal Brexit planning table September 2019

Research and development		
Key point	Update	Remaining concerns
17) The EU research and innovation programme Horizon 2020 has helped to foster a collaborative approach between UK and EU veterinary researchers.	<p>Latest government advice is here: <a href="#">How Horizon 2020 funding will be affected if there's a no-deal Brexit.</a></p> <p>The government has committed to guarantee funding for all successful competitive UK bids to Horizon 2020 that are submitted before we leave the EU, if there's a no-deal Brexit.</p>	<p>Have vets in academia/ members/ VSC raised any issues?</p>
18) In a no deal scenario, the UK government has stated it will guarantee the funding for UK organisations which have competitively bid for Horizon 2020 projects. However, there is uncertainty about continued UK eligibility for parts of the programme.	<p>The guarantee also covers all successful competitive UK bids to Horizon 2020 calls open to third-country participation submitted between Brexit and the end of 2020. Both the guarantee and extension commit funding to UK Horizon 2020 participants for the lifetime of projects.</p> <p>UK Research and Innovation (UKRI) will also manage the independent assessment of UK applications to European Research Council (ERC), Marie Skłodowska-Curie Actions (MSCA) and SMEi grants that have been submitted before Brexit, if they are not assessed by the European Commission. Successful applications will be funded for the lifetime of the project.</p>	<p>Have UK institutions or veterinary academics lost opportunities to partake in projects as a result of expected changes?</p>

## BVA No-deal Brexit planning table September 2019

Trade		
Key point	Update	Remaining concerns
<p>19) The EU would require the UK to be a “listed third country” before any animals or animal products can be exported into the Single Market.</p>	<p>UK will need to be re-listed ahead of 31st October to export any live animals/ animal products or horses.</p> <p>UK was unanimously agreed by Standing Committee on Plants, Animals, Food and Feed in April, and would expect to meet the requirements again at our next attempt.</p> <p>That should be at a SCOPAFF meeting ahead of October 31st- but will probably be close to that date- cannot be confirmed yet. Standing Committee on Plants, Animals, Food and Feed meetings <a href="#">schedule</a> suggests meeting will be held: 24-25 September, 24-25 October.</p> <p>If no animals or products of animal origin can be exported, this will have detrimental affects on all sectors, particularly those heavily reliant on the EU export market.</p>	<p>Will the UK be listed ahead of Brexit? When will we know?</p>
<p>20) All exports to countries inside the Single Market would require an Export Health Certificate (EHC) signed by an Official Veterinarian (OV) creating an additional demand on veterinary capacity.</p>	<p>Meeting EHC requirements, saw the introduction of Certification Support Officers (CSOs) to support the work of Official Veterinarians (OVs). This required changes to RCVS guidance. Figures from Defra show 253 have registered, of which 175 have enrolled on training, but only 48 have qualified so far.</p> <p>Defra have asked for support with spreading messages to vets about the importance of completing training modules. Overall, they now have 985 vets qualified for product exports (772 in England, 103 in Wales, 99 in Scotland).</p> <p>In February 2019, <a href="#">Animal and Plant Health Agency</a>(APHA), announced the availability of free-of-charge online training for the Official Controls Qualification for Products Exports (OCQ(V) - PX), and, where candidates are eligible, prerequisite courses in Essential Skills (OCQ(V) - ES) and Exports General (OCQ(V) - EX).</p>	<p>What is the latest assessment of increase in amount of EHCs needed?</p> <p>Is Government confident that we have the necessary workforce (both OVs and CSOs) to complete EHCs? Have the subsidy schemes been successful?</p> <p>Are the new EHCs and guidance useful and are vets/ farmers aware that they will be needed?</p>

## BVA No-deal Brexit planning table September 2019

	<p>The OCQ(V) – PX covers the export of animal products, including food for human consumption and animal by-products. Candidates must have contacted APHA and subsequently registered on the OV database and/or enrolled on the course offered free of charge by 29th March 2019.</p> <p>A similar initiative has been made available through the Welsh Government to OVs working within the Veterinary Delivery Partnerships (VDP) network in Wales. <a href="#">80+ veterinary surgeons are being trained up to ensure meat and animal products exports are approved in Wales.</a></p> <p>New EHC to EU are <a href="#">available here</a>, with accompanying guidance.</p>	
21) Defra may need to negotiate with 154 non-EU countries to agree new versions of over 1,400 EHCs.	<p>In September the NAO reported that, Defra was focusing on reaching agreement with 15 countries that account approximately 90% of total exports to non-EU countries of animal products, and live animals, but was not expecting to be able to complete negotiations with all the remaining 139 countries by March 2019.</p> <p>After this publication Defra noted there had been a change in approach, instead of renegotiating new certificates with each country they would seek agreement that existing EU certificates would continue to be recognised.</p>	Are there any outstanding third countries which have not agreed to roll over certificates?
22) Exports of animals and products of animal origin would be required to enter the EU via a Border Inspection Post (BIP), which may radically change the flow of exports.	<p>France: <a href="#">Calais is constructing a BIP (Border Inspection Post)</a>-though not yet recognised in <a href="#">EU Commission list</a>. Also employing vets to perform checks.</p> <p>No is in place BIP on Irish land border.</p>	<p>Will Calais BIP be approved by EC, and when?</p> <p>If not, are exporters prepared to move supply through other ports with designated BIP?</p>
23) The UK would lose access to TRACES (the EU trade control and export system) as part of its import control system and a new system would need to be developed at a cost of £27.5 million.	<p>If the UK exits the EU without a deal, on 31 October 2019, you will no longer be able to use the EU's TRACES System to certify UK imports from outside the EEA countries.</p> <p>The replacement system, the Import of Products, Animals, Food and Feed System (IPAFFS) should be used instead.</p>	<p>What are the plans to pilot the Import of Products, Animals, Food and Feed System (IPAFFS) and communicate with vets and farmers?</p> <p>How will IPAFFS interact with other IT systems</p>

## BVA No-deal Brexit planning table September 2019

	<p>IPAFFS is a web-based service for the application for, and issuing of, Common Veterinary Entry Documents (CVEDs) for imports from outside the EU of live animals, their products and germplasm. IPAFFS is the system used for notifying UK authorities of movements of live animals, germplasm and certain other commodities into to the UK from Third Countries.</p>	<p>and EU systems?</p> <p>What systems are in place if IPAFFS experiences failure?</p>
<p>24) Impact of tariffs on agri-food trade.</p>	<p>UK has published its tariff schedule, and EU will be required to apply its WTO schedule to the UK as a third country. AHDB <a href="#">analysis here</a>. Agricultural produce has amongst the highest tariff barriers into the EU. UK has raised tariffs for some agri-food sectors.</p> <p>Concerns have been raised in media reporting about the contingency planning where export markets become uneconomical because of tariffs. <a href="#">No-deal Brexit could cause mass slaughter of UK lambs as end of European trade spells 'disaster' for farmers (July 2019)</a></p> <p>August 2019: <a href="#">BBC reported</a> that 45,000 dairy cattle in NI would be at risk of a cull in a no-deal Brexit scenario. <a href="#">UFU responded</a> saying they were not anticipating no-deal Brexit dairy cow cull</p> <p>Reports that in the event of <a href="#">no deal</a> the government will buy slaughtered livestock at set prices to prop up demand that will collapse in Europe because of high tariffs. This would maintain production but continue to place demands on abattoirs which do not have the required veterinary workforce- thus overstocking would continue.</p> <p>Wider economic and environmental issues attached to culling productive and healthy animals where value has been lost because export markets are lost. Including the welfare impact on farmers/ vets seeing healthy animals culled.</p>	<p>Will tariffs create incentives for live exports? E.g. UK tariff schedule says for imports into UK of lamb</p> <ul style="list-style-type: none"> <li>• Live animal 80.5 Euros/ 100kg</li> <li>• Carcass 12.8% + 171.3 Euros/ 100kg</li> </ul> <p>What will the financial impact on farming businesses and the veterinary businesses that service them?</p>

## BVA No-deal Brexit planning table September 2019

	<p>Rolled over trade deals with several countries on same or similar terms with those in place through EU. List of countries where roll-over deals have been agreed <a href="#">is here</a>.</p>	
<p>25) Waste products moved across borders. (animal waste, clinical waste etc.).</p>	<p><a href="#">Animal waste export 'threatened' under no deal Brexit</a> Guidance of importing and exporting waste in a no-deal situation <a href="#">is here</a>. The UK government has secured an agreement that all UK consents for shipments of notifiable waste that go beyond 31 October 2019 will be rolled over.</p> <p>This follows the process set out by the European Commission (EC) in the notice 'Withdrawal of the UK and EU waste law' issued on 8 November 2018. If the UK leaves the EU, the UK will remain a:</p> <ul style="list-style-type: none"> <li>• party to the Basel Convention</li> <li>• member of the Organisation for Economic Co-operation and Development (OECD)</li> </ul> <p>The UK will be treated the same way as any other OECD country or any country party to the Basel convention that intends to export waste to an EU country. The current waste shipments procedures will still apply.</p> <p>We have asked CVO for her assessment of plans to handle waste</p>	<p>If the UK is unable to move waste to the EU for processing/ disposal are there contingency plans in place?</p>
<p>26) Potential for new trade deals in the event of a no-deal which undermine the UK's high standards of animal health, animal welfare, public health and antimicrobial use.</p>	<p>Reports that no deal Brexit could see the UK prioritise reaching quick trade deals with other nations including the USA. <a href="#">Trump Tells Johnson He Wants Post-Brexit UK-US Trade Deal 'Within A Year'</a></p> <p><a href="#">DIT has consulted on</a> UK/US trade negotiations and <a href="#">BVA response where we raise our concerns</a>. BVA has been attempting to secure a meeting with the relevant people in DIT.</p> <p>Concerns that government does not understand these concerns raised as the Defra CSO made a statement in the Telegraph in</p>	<p>Will the UK government refuse to agree a trade deal where the UK would have to accept products produced to lower animal health, welfare and public health standards?</p> <p>Would trade deals be passed that would undercut UK producers who produce to high standards and affect the viability of UK farming?</p>

# BVA No-deal Brexit planning table September 2019

	August 2019 <a href="https://www.telegraph.co.uk/news/2019/08/29/no-health-reason-ban-chlorinated-chicken-says-governments-scientific/">https://www.telegraph.co.uk/news/2019/08/29/no-health-reason-ban-chlorinated-chicken-says-governments-scientific/</a>	
--	--	--

## BVA No-deal Brexit planning table September 2019

Devolution		
Key point	Update	Remaining concerns
<p>27) A no deal Brexit will mean there will be no transition period where EU law will continue to take effect across the UK. This will reduce the time available in which common frameworks to coordinate animal health and welfare policy across the four parts of the UK can be agreed.</p>	<p>EU directives and regulations have provided for common approaches across the UK. This has been particularly true within the areas of interest to the veterinary profession: animal health, animal welfare, public health including food safety, traceability and trade.</p> <p>Statutory instruments passing through Parliament have presented concerns and different SIs took different approaches to devolution.</p>	<p>How will the different jurisdictions of the UK coordinate action on animal health, welfare and public health in a no deal Brexit?</p> <p>Are messages from all UK governments consistent?</p>
<p>28) Whilst these common frameworks are being designed and implemented, the UK government will be able to maintain the existing common arrangements through the exercise of regulations in specific areas.</p>	<p><a href="#">The Zoonotic Disease Eradication and Control (Amendment) (EU Exit) Regulations 2019</a>. Here we welcome the continuation of a duty placed on the competent authorities to cooperate with each other. However, where there is divergence in the goal of a programme (e.g. where the different parts of the UK decide to set, modify or omit a different target for the reduction of the prevalence of the zoonoses and zoonotic agents) that cooperation could be limited.</p> <p>Draft <a href="#">Trade in Animals and Animal Products (Legislative Functions) and Veterinary Surgeons (Amendment) (EU Exit) Regulations 2019</a> appeared to have been a better consideration of devolution within the drafting of the legislation and appropriate procedures legislated for than we have seen in the past. The UK SoS can only legislate to add/ amend or remove a country (or part of a country) with the consent of the other devolved Ministers/ DAERA. This is welcome as it will ensure consistency across the UK.</p>	

## BVA No-deal Brexit planning table September 2019

Northern Ireland		
Key point	Update	Remaining concerns
<p>29) There would be no agreed “backstop” in place to avoid the need for veterinary checks on live animals and products of animal origin at the land border between Northern Ireland and Ireland. Official Veterinarians (OV) would be required to undertake these checks.</p>	<p>We have been reassured by the NI CVO that he and his team will be as prepared as they can be given the degree of uncertainty. They, as a Department, deployed emergency plans and focused resources on this single issue.</p> <p>Important to note NI is different from GB in a number of ways. DAERA do much more export certification in-house with their Government vets. Currently egg and fish exports are dealt with by Environmental Health Officers, beef and dairy by DAERA. Live animals, hides, skins and a few other sundry, products of Animal Origin are dealt with by private vets who are Authorised Veterinary Inspectors (AVI).</p> <p>DAERA employ vets and have them trained up in house. They have also been employing Certification Support Officers (CSOs) to support the work of vets. DAERA has been in discussions with veterinary representative bodies to meet the needs of private vets to step up and do more EHCs. DAERA provides training for AVIs.</p> <p>Manufacturing NI tweeted “This year, 18,000 Export Health Certificates are issued for food goods which cross the border. That will rise to an estimated 2,000,000 EHC’s in No Deal!” Which is in line with the estimates we’ve seen.</p> <p>Part of the reason why this increase is so large is the integration of agri-food on the island, the larger size of the sector compared to GB and the complex nature of the food that crosses (not simply consignments of milk or lamb but finished products)</p> <p>As Simon Doherty noted in his <a href="#">interview with BBC</a>-</p> <p>"Take pizza," he says. "Imagine it's produced in Northern Ireland</p>	<p>Will the veterinary profession have the capacity to meet the increase in EHCs, pet travel, equine certification etc.?</p> <p>What will happen on (or near) the land border for movements of live animals and products of animal origin?</p> <p>Will pet passports be enforced crossing the Irish land border?</p>

## BVA No-deal Brexit planning table September 2019

	<p>and exported to the Republic of Ireland and each ingredient comes from a different country. Let's say it has chicken from Thailand, chorizo from Spain and cheese from Ireland. Each of these individual ingredients will require their own audit trail if the rules are enforced."</p> <p>Ultimately knowing the rise in EHCs will be impossible because other factors will play a part including tariffs which will make moves across the border uneconomic.</p> <p>5 September 2019: <a href="#">No-deal Brexit checks 'needed near Irish border' - Varadkar</a>. Some checks on goods and live animals may need to take place near the Irish border in a no-deal Brexit, Leo Varadkar has said. As far as possible, checks would take place at ports, airports and firms, the Taoiseach said, and his government was "working out the details" with the EU.</p> <p>Alternative Arrangements considering ways to address Irish border to avoid need for backstop- however, problem is not solved. Report from September 2019: <a href="#">Irish border after Brexit – all ideas are beset by issues says secret paper</a></p>	
--	---	--