

1 WHO WE ARE

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 17,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country. We therefore take a keen interest in all issues affecting the profession and how the profession can effectively serve the needs of society.
2. 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.
3. We welcome the opportunity to respond to this inquiry on Wales' future relationship with the European Union (EU).

2 KEY POINTS

4. 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.
5. Each year, around 50% of vets registering to practise in the UK come from overseas, with the vast majority of these coming from the rest of the EU. A future immigration system must prioritise the veterinary profession. In the short term, vets should be immediately restored to the Shortage Occupation List.
6. Any future relationship with the EU should maintain parity with the current veterinary medicine approval systems.
7. When shaping a new agricultural policy, the UK and Welsh Governments should give regard to the BVA principles for the future of agriculture policy post Brexit.

3 INTRODUCTION

8. Since the EU referendum in June 2016, we have been working hard to collate the views of our membership on Brexit - thinking about the potential impact on the veterinary profession; on animal health and welfare; public health; agriculture; trade and research. BVA has produced the report Brexit and the veterinary profession which explores the challenges and opportunities across several areas of

public policy all of which will depend, in some way, on the future relationship with the EU.

9. Government spending in Wales has been supported by EU funding. Wales is one of the only areas of the UK - alongside Cornwall - to receive ongoing funding from the EU to support deprived communities. In budgetary terms, Wales is a net beneficiary of EU membership, currently receiving about £680million in EU funding each year. The bulk of this funding comprises receipts under the Common Agricultural Policy (CAP) and Structural Funds.

10. Veterinary surgeons play a crucial role in helping to build strong communities and supporting Wales' agricultural industry, which is the cornerstone of the Welsh economy. Brexit provides the opportunity to develop a strong, competitive and innovative agricultural and food industry with agricultural policy tailored to the needs of Wales. There must also be oversight and coordination of animal health and welfare policy across the four administrations of the UK. BVA has developed principles for the future of agriculture policy post Brexit.

11. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries. Veterinary surgeons play an essential role in the operation of trade, working as official controllers at farms, food premises and other settings in Wales carrying out official controls (inspection and audit). These Official Veterinarians (OVs) both certify and supervise the import and export of animals and animal products to and from third countries. The volume of products requiring veterinary export health certification could increase by up to 325% in the event of no deal being reached between the EU and UK.

12. The importance of ports to the Welsh economy is significant, with 18,400 jobs directly supported. At present, over 70 per cent of Irish cargo (including produce from Northern Ireland) passes through Wales. This is because this offers the quickest route for exporters to Great Britain and the EU. The requirement for veterinary checks on animals and products of animal origin at ports could reduce the efficiency of traffic passing through the ports. Consequently, there is a risk of displacement of traffic from Welsh ports.

13. 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. In both 2015 and 2016, RCVS registered more non-UK EU vets than UK graduates. Therefore, the Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU or from outside the EU, to ensure this essential veterinary work continues.

14. 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 and in future domestic agricultural policy.

4 VETERINARY CERTIFICATION IN TRADE

15. Last year, the total value of all Welsh exports was £16.4 billion, up £2.6 billion 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.

16. 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.

17. 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.

18. 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.

19. 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.”

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.

25. Where additional veterinary certification checks on animals and products of animal origin are required at ports this will reduce the efficiency of traffic passing through the ports. Consequently, there is a risk of displacement of traffic from Welsh ports. At present, over 70 per cent of Irish cargo (including produce from Northern Ireland) passes through Wales. To maintain this and capture the benefits of any new trade deals additional capacity at ports will be necessary. Extra inspections and inspection points will be needed. Furthermore, the necessary additional OVs to execute the inspections will be required on site.

5 VETERINARY WORKFORCE

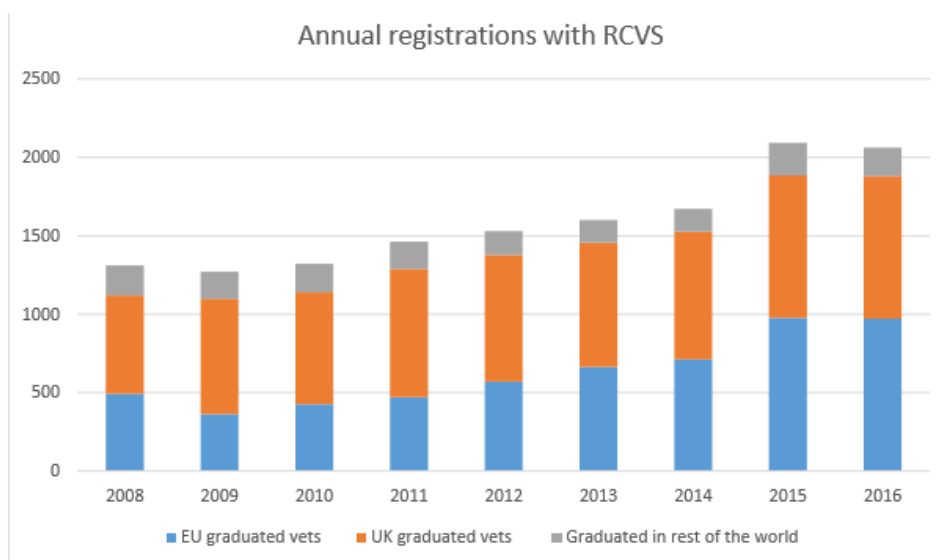
26. A strong veterinary workforce is vital to maintaining high animal health and welfare, food safety standards and overall public health. In the short to medium term, it will be impossible to meet this demand with UK nationals. Any increase in UK veterinary students may be a long term and gradual position but there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

27. The UK Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU or from outside the EU, to ensure this essential veterinary work continues. As the House of Lords European Union Committee noted in the report Brexit: farm animal welfare:

“Veterinarians play a key role in ensuring and inspecting farm animal health and welfare in the UK from farm to abattoir. They also play an important role in certifying animals in the context of trade. We note the overwhelming reliance on non-UK EU citizens to fill crucial official veterinary positions in the UK, and call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”

28. 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.

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



30. Non-UK 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

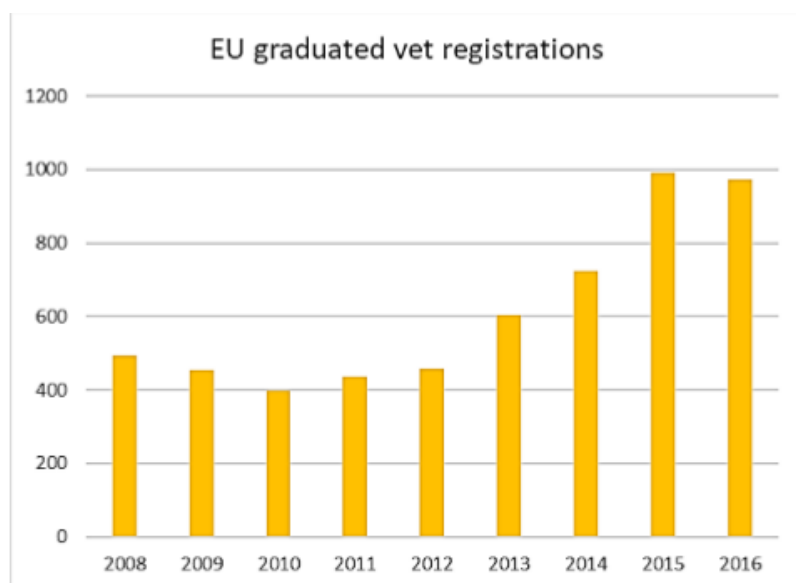
auditing meat hygiene in abattoirs graduated overseas with the clear majority of these being non-UK EU graduates.

31. 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.

32. 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."

33. 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.

34. 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.



35. 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."

36. 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.

6 VETERINARY MEDICINES

37. 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.

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

7 CONCLUSIONS

39. At present, non-UK EU vets are faced with considerable uncertainty about their futures. The publication of the joint report on progress in phase 1 of the Brexit negotiations has provided some clarity on the way forward. We now call upon the UK Government to bring forward legislation that will give legal effect to this agreement and guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

40. 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.

41. 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.

42. Any future relationship with the EU should maintain the link with the current veterinary medicine approval systems.

43. When shaping a new agricultural policy, the UK and Welsh Governments should give regard to the BVA principles for the future of agriculture policy post Brexit.