

Written evidence submitted by the British Veterinary Association (FSA0033)

BVA briefing for Scottish Affairs Committee: The future of Scottish agriculture post-Brexit inquiry

Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has 18,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. BVA's Scottish Branch brings together representatives of the BVA's territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.

What should be the priorities of any future agricultural support system in Scotland?

3. After 2020, Scotland can decide whether it wants to continue paying income support to farmers in line with the Common Agricultural Policy (CAP) or whether it is an occasion to reinvent policy.
4. Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. A new agricultural policy should be both ambitious and focussed on delivering outcomes.
5. BVA believes that the following objectives should be embedded within a new agricultural policy for the Scotland.

Support animal health and welfare as public goods

6. The Scottish Government should utilise public money to incentivise and support animal health and welfare outcomes as public goods. Public goods by their very nature, are not market goods in the same way as livestock products such as meat or milk. Public goods have no explicit value in terms of market prices and so the market cannot efficiently allocate resources to them. Other means therefore must be used – such as the intervention of Government in the form of regulation or financial support.¹
7. The wider economic and societal impacts of animal health and welfare are substantial. The UK 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.²
8. Agricultural policy should support animal health and welfare which underpins the reputation of UK agricultural produce. Michael Gove MP, Secretary of State for Environment, Food

¹ Farm Animal Welfare Committee (FAWC), Economics and Farm Animal Welfare, 2011

² National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002

and Rural Affairs, has stated that “high animal welfare standards and high environmental standards reinforce the marketability of our produce.”³ Scotland’s National Food and Drink Policy states that:

9. “Reputation is central to Scottish food and drink industry’s ability to sustain its current position and its ability to grow turnover and profitability in Scottish, wider UK and international markets.”

Outcomes based

10. Under a new agricultural policy, measurement should be predominantly based on outcome safeguards and done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare. A welfare outcome safeguards approach contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal’s health and welfare needs.

Indicators of positive welfare should be incorporated into welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)’s “good life” framework.⁴ Behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes.

11. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct assessment.

Animal welfare stewardship programme

12. Delivering these public goods should be at the heart of a new post Brexit agricultural policy-benefiting producers, consumers and wider society. In the report Brexit and the Veterinary Profession, BVA proposed a new animal welfare stewardship programme.⁵ This call is in line with the Farm Animal Welfare Committee (FAWC)⁶ and the Veterinary Development Council⁷ recommendations that the UK governments should work with industry to actively protect animal health and welfare and that this should include consideration of a farm animal welfare stewardship programme. Such a scheme, focussed on health and welfare that is evidence based and with welfare outcome safeguards, would use financial support for animal welfare as a public good, as has been the case for environmental stewardship. In 2014, the FAWC set out a proposed approach to developing such a stewardship programme starting with limited trials in each of the main livestock sectors.⁸

Farm assurance

³ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

⁴ Farm Animal Welfare Committee (FAWC). 2009. Farm Animal Welfare in Great Britain: Past, Present and Future. FAWC

⁵ British Veterinary Association, Brexit and the Veterinary Profession, 2017

https://www.bva.co.uk/uploadedFiles/Content/News,_campaigns_and_policies/Policies/Future_of_the_profession/brexit-and-veterinary-profession-v.1.0.pdf

⁶ FAWC (previously the Farm Animal Welfare Council), Economics and Farm Animal Welfare, 2011

⁷ Veterinary Development Council, The Veterinary Development Council Report 2011–2012, 2012

⁸ FAWC, An Animal Health and Welfare Stewardship Programme 2014

13. Post-Brexit agriculture policy could also support animal health and welfare by encouraging uptake of farm assurance schemes to incentivise animal health and welfare outcomes. Farm assurance schemes enable citizens to make sustainable and ethically informed choices about the food products they buy and the impact of these products on animal health and welfare.
14. BVA recognises that from an animal health and welfare point of view, it is not sufficient to carry out a tick-box exercise in terms of inputs. BVA supports welfare outcome assessment safeguards in assurance schemes as a tool to drive continuous improvement of animal management and husbandry practices, in turn promoting high animal health and welfare.
15. BVA believes that there is work to be done in communicating the value of improved animal health and welfare, and of assurance schemes in achieving this, to producers, farmers, citizens, retailers and others, so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood. Therefore, in December 2017, BVA published a detailed policy position on farm assurance schemes.⁹ The veterinary profession has a key role to play signposting the public in a professional and ethically justifiable way towards those farm assurance schemes that promote higher animal welfare.¹⁰

Disease surveillance

16. Scotland's farmers, crofters and growers produce output worth around £2.9 billion a year and are responsible for much of Scotland's £5 billion food and drink exports.¹¹ Exports of Scottish salmon to the EU were valued at £204million for 2016.¹² A robust surveillance system is integral to the realisation of these high value outputs. The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides high-quality intelligence on animal health and welfare that enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare, productivity, and identify and manage threats to public health, trade, food quality, the environment and leisure and tourism.
17. The withdrawal of the UK from the EU will have far-reaching implications on the UK's biosecurity and disease surveillance policy. EU legislation, structures and institutions are embedded within the UK surveillance network.
18. BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit.¹³ The development of a new agriculture policy presents an opportunity to modernise and optimise our animal health and disease monitoring networks.

The role of livestock in achieving environmental public goods

19. Environmental outcomes and animal health and welfare outcomes can be mutually beneficial. The use of innovative whole farm management systems that integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and

⁹ British Veterinary Association, BVA Position on Farm assurance schemes, 2017

¹⁰ British Veterinary Association, Vets speaking up for animal welfare BVA animal welfare strategy, 2016

¹¹ NFUS, Farming Facts: Scottish farming, 2017, Available at: <https://www.nfus.org.uk/farmingfacts.aspx>

¹² BBC Scotland, Exports of Scottish salmon leap by 17%, 2017 [Online] Available at: <http://www.bbc.co.uk/news/uk-scotland-scotland-business-39699830>

¹³ British Veterinary Association, Position on veterinary scanning surveillance (animal health and disease monitoring), 2018

welfare food products is paramount to ensure environmentally sustainable agriculture. Veterinary input is essential to the design and implementation of these systems.

20. Animal agriculture can be a significant contributor to climate change. To mitigate climate change, changes in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare. Schemes designed to advance national animal health with a focus on disease prevention and eradication can help to maximise performance and reduce wastage including greenhouse gas emissions.

What funding will Scotland's agricultural sector require post-Brexit?

21. Currently Scotland currently receives around 17% of the total UK CAP budget. All of Pillar 1 funding comes from the EU. Pillar 2 funding comes partly from the EU and (in Scotland) partly from the Scottish Government. CAP payments are an important part of farm incomes in the UK: In the UK, EU farm subsidies currently make up around 50-60% of farm income.¹⁴ NFUS places the figure in Scotland higher, stating "agricultural support made up 66% of total income from farming in 2016."¹⁵

Any change in policy must be cognisant of this dependence and properly examine any consequences. Any decision will also be made within a context of considerable uncertainty about future trading relationships with the EU and other countries. Agriculture, as a sector, is particularly exposed to any disruption in trading relationships with the EU and other countries.

22. Any requirement for veterinary checks on animals and products of animal origin at ports could reduce the efficiency of produce moving to European markets and place additional administrative costs upon farmers.
23. This uncertainty means it will be difficult to assess the full impact of the withdrawal of direct payments to farm incomes. More challenging will be determining the impact on the wider rural economy that deliver goods and services to farms. Farm animal veterinary practices in the UK represent an important service sector to livestock farmers, and act as means to detect disease and enforce animal health and welfare legislation. Ensuring the continued capability of farm animal practice as a means of achieving the public goods of animal health and welfare should be properly assessed by the Government. BVA is supportive of the Scottish Government's plan to provide a transition/ implementation period which aims to provide land managers with stability and confidence to invest in their businesses and thereby deliver public benefit.
24. While a period of stability is welcome, where there is scope for improvement this should be exploited. This time should also be used to develop and trial an ambitious new agricultural policy that is focussed on delivering outcomes. BVA believes that

How should a future agricultural policy seek to accommodate different sectors of the farming community, especially those in remote and less favoured areas, and crofters?

25. As animal health and welfare specialists and advocates the veterinary profession is well-placed to advise and influence sustainable animal husbandry practices at whole system levels, safeguarding animal health and welfare and influencing sustainable future livestock

¹⁴ House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016

¹⁵ National Farmer Union of Scotland, STEPS TO CHANGE: A New Agricultural Policy For Scotland <https://www.nfus.org.uk/userfiles/images/Policy/Brexit/STEPS%20FOR%20CHANGE%20March%202018%20-%20for%20email.pdf>

and food production. No trade in live animals and animal products can take place without veterinary certification and veterinary specialists are crucial in protecting public health (including food safety). Thus, the involvement of the veterinary profession within any system of agricultural support is integral.

26. The veterinary profession is relatively small, with around 25,500 UK-practising veterinary surgeons, but its reach and impact are significant. The UK veterinary profession is an integral part of the international scientific community using evidence and practical skills to further animal health and welfare, and public health. Almost half of the veterinary surgeons who register in the UK each year qualified elsewhere in the European Union. In some sectors, such as the meat industry, over 90% of veterinary surgeons are EU nationals.
27. Veterinary surgeons work across the economy, allowing strategically important sectors to operate successfully - this would be impossible without the contribution of EU vets. As the Government response to the House of Lords EU Energy and Environment Sub-Committee notes:

“Many vets working in the UK are EU nationals...and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority.”¹⁶
28. This is particularly true in Scotland where support is already provided to animal veterinary practices, in some remote areas of the highlands and islands, because without them, crofters and their animals would be completely without practical veterinary cover.¹⁷
29. Before the EU referendum, UK veterinary practices reported difficulties recruiting. This problem has intensified following the Brexit vote, as non-UK EU vets have faced considerable uncertainty about their futures. The Major Employers Group which represents some of the largest UK veterinary businesses providing primary care directly to the public, conducted a survey of vacancy rates amongst its members in July 2017. This found an average workforce shortage of approximately 11% for veterinary surgeons and 5.6% for veterinary nursing. A subsequent survey was conducted in November 2018 and showed 890 vacancies in member practices employing over 7700 veterinary surgeons, representing a veterinary workforce shortage of approximately 11.5%.
30. 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.
31. A future immigration system must prioritise the veterinary profession. The Government should consider the economic and social impact the profession has, beyond its relatively small size. To ensure animal health and welfare; food safety and public health and the facilitation of trade which requires veterinary certification, due regard should be given to the specific needs of the veterinary profession including:
 - The projected demand for veterinary surgeons following the exit from the EU;
 - The difficulty in meeting this demand with UK citizen vets, including the time and resource needed to increase university capacity;

¹⁶ Government Response to the House of Lords European Union Committee Report on Brexit: Farm Animal Welfare <http://www.parliament.uk/documents/lords-committees/eu-energy-environmentsubcommittee/Brexit-farm-animal-welfare/Gov-Brexit-farm-anim.pdf>

¹⁷ Highlands and Islands Veterinary Services Scheme (HIVSS)

- The nature of many veterinary practices as small businesses unable to meet the demands of an onerous visa-based system.

32. The Immigration White Paper includes plans to scrap the cap for skilled workers and a consultation on a minimum salary requirement of £30,000 for skilled migrants seeking five-year visas. BVA has warned that a £30,000 threshold for EU workers could lead to a near-total wipeout of veterinary surgeons in critical public health roles in UK slaughterhouses, with devastating consequences for UK trade.¹⁸

What should be included in common frameworks between the UK and devolved administrations in relation to agriculture?

33. Due to the differing nature of the make-up of the veterinary workforce, the provision of veterinary education, and the agricultural industry in the four parts of the UK, Brexit will impact in different ways.

34. Legislation and regulation governing the work of the veterinary profession in the UK is a mixed picture. While much of the direction comes from the EU, implementation happens at both UK and devolved levels. Regulation of the veterinary profession and legislation relating to veterinary medicines, for example, are UK-wide, while animal health and welfare are devolved matters. Directives and regulations from the EU have thus far provided for common approaches across the UK to many of the issues of interest to the veterinary profession.

35. Brexit may allow policy differentiation within the UK in areas where EU law has previously provided a common legal framework. According to analysis conducted by the UK government, there are a total of 142 distinct policy areas where EU law intersects with devolved powers in at least one of the three devolved nations. The department with the greatest number of policy areas falling into this category is Defra.¹⁹

36. The UK, Scottish and Welsh governments agreed in October 2017 that new UK-wide arrangements should be created to replace EU law in some areas, to provide legal certainty and regulatory consistency. Northern Ireland was represented by civil servants due to the ongoing absence of a devolved government in Belfast. Together they announced six broad principles to determine where new UK-wide “common frameworks” should be established.²⁰

37. To prevent or limit divergence, common frameworks may need to be created to “set out a common UK, or GB, approach and how it will be operated and governed”. Depending upon the policy area, “this may consist of common goals, minimum or maximum standards, harmonisation, limits on action, or mutual recognition”.²¹

38. A no deal Brexit will mean there will be no transition period where EU law will continue to take effect across the UK. In turn, this will result in much of the time where common

¹⁸ <https://www.bva.co.uk/news-campaigns-and-policy/newsroom/news-releases/new-immigration-rules-risk-no-vets-in-abattoirs,-warns-bva/>

¹⁹ Institute for Government, *Brexit, devolution and common frameworks*,

<https://www.instituteforgovernment.org.uk/explainers/brexit-devolution-and-common-frameworks>

²⁰ Cabinet Office, Northern Ireland Office, Office of the Secretary of State for Scotland, Office of the Secretary of State for Wales, Department for Exiting the European Union, The Rt Hon David Davis MP and The Rt Hon Damian Green MP, Joint Ministerial Committee Communiqué: 16 October 2017, retrieved 23 February 2018, www.gov.uk/government/publications/joint-ministerial-committee-communication-16-october-2017

²¹ HM Government, Joint Ministerial Committee communiqué: 16 October 2017

<https://www.gov.uk/government/publications/joint-ministerial-committee-communication-16-october-2017>

frameworks can be agreed being truncated. The European Union (Withdrawal) Act 2018 makes provision for the period where these common frameworks are being designed and implemented. In this time the UK government will be able to maintain the existing common arrangements through the exercise of regulations in specific areas.²²

May 2019

²² Written Ministerial Statement: European Union (Withdrawal) Bill - Agreement between the UK and Welsh governments Statement from the Chancellor of the Duchy of Lancaster, David Lidington. 25 April 2018