

Written evidence submitted by the Food Standards Agency (FSA) (VSH0003)

Environment, Food and Rural Affairs Committee Non-Inquiry Hearing: Vet Shortages

Summary

This pre-reading will cover the following:

- Strategic context.
- What our vets do.
- Legislative context.
- Challenges the FSA faces.
- How this impacts the consumer.
- Actions to mitigate workforce shortages.
- Ongoing challenges.
- Actions that could support systemic change.

Strategic context

1. Royal College of Veterinary Surgeons (RCVS) data looking at UK practicing vets shows that:
 - a. In 2021, 45% of leavers had been in the profession for four years or less, including 21% who had less than one year of experience.
 - b. 2020 saw the highest number of vets leaving UK practice in 10 years.
 - c. Between 2019 and 2021 joiners to the UK veterinary profession fell by 26% (from 2,782 in 2019 to 2,119 in 2021).
 - d. In 2019, 1134 EU vets joined the RCVS register, compared to 365 in 2021 (post EU Exit and Covid). The number of EU vets registering with the RCVS in 2023 was 527, showing only a slight recovery.
 - e. And to put this within a wider context, [the Federation of Veterinarians of Europe \(FVE\) 2023 survey](#) of the profession reported that "Up to 59% of European veterinarians surveyed in 2023 viewed 'too much work' as a key challenge and 49% cited recruitment difficulties or staff shortages."
2. An important factor has been the changes that were implemented following the UK's departure from the EU which impacts EU vets who now need to meet specific criteria, as well as obtain a work visa, to practice in the UK. Before departure from the EU, all EU veterinary school qualifications were recognised in the UK (through mutual recognition of professional qualifications (MRPQ)) and there were no additional language requirements, meaning vets were able to freely move and practice in the UK. Post EU Exit, to practice in the UK all overseas vets, including those from the EU, must either qualify from a European Association of Establishments for Veterinary Education (EAEVE) or a Royal College of Veterinary Surgeons (RCVS) accredited university or pass the RCVS Statutory Membership Exam. They also must achieve the International English Language

Testing System (IELTS) Level 7 English qualification which is defined as a good level of proficiency of the English language with the ability to handle complex language well and understand detailed reasoning. EU graduates have historically (and to date) formed a significant percentage of the UK's veterinary workforce so, these changes and increased demand for veterinary resources in the EU have acted as a disincentive and had a negative effect on Official Veterinarian (OV) recruitment.

3. Vets working across the meat sector underpin the economy, providing value to the **£9.1bn domestic meat industry and the £2.1bn meat export trade**. Our OVs and Official Auxiliaries (OAs) or Meat Hygiene Inspectors (MHIs), are responsible for assuring the safety of food produced in abattoirs in England and Wales. On an annual basis, they inspect in the region of 1.85m cattle, 12.4m sheep and goats, 9m pigs, 990m poultry and 1.9m wild game and in addition conduct over 800 unannounced inspections in approved cutting plants and 300 animal welfare assurance visits in approved abattoirs.
4. The role of vets in Public Health, particularly abattoirs, is important but often not seen as attractive within the profession in the UK (99% of OVs working in abattoirs are from overseas). In an increasingly competitive domestic and international veterinary jobs market, with rising salaries in private practice and the visa and enhanced language entry requirements for EU vets post EU Exit, the FSA and its SDP's heavy reliance on an international OV workforce to deliver Official Controls is under increasing pressure, as highlighted in the joint Food Standards Agency/Food Standards Scotland [2022 Annual Report](#).

What our vets do

5. Our OVs must be present for abattoirs to legally operate in the UK (and to export to the EU). OVs inspect animals before and after slaughter to identify any diseases or conditions that could affect public or animal health. As an example, foot and mouth disease was originally identified at an abattoir in 2001. Abnormalities are then investigated further (e.g. suspicion of notifiable diseases), and/or reported to the management of the abattoir as well as the farmer at the farm of origin. OVs are supported in most abattoirs by our skilled OAs or MHIs, who work with the OV in ensuring that meat from approved abattoirs across England and Wales is held to the highest welfare and safety standards. MHI/OAs work under the supervision of an OV, with the OV ultimately being responsible for the delivery of Official Controls.
6. Our OVs also monitor and enforce animal welfare compliance in approved abattoirs on behalf of the Department for Environment, Food and Rural Affairs in England (Defra) and the Welsh Government in Wales through a Service Level Agreement. In Northern Ireland, this work is carried out by the Department of Agriculture, Environment and Rural Affairs (DAERA). Animal welfare requirements are monitored and enforced by OVs to ensure that animals are spared avoidable pain, distress or suffering during operations.

7. Our OVs are therefore vital in protecting Animal Health and Welfare, assuring Food Safety and underpinning International Trade in meat products and animal by-products. They ensure meat Food Business Operators (FBOs) are compliant with the law so that we, as the public, can be confident that our food is safe and traceable throughout the production process and back to origin (farm to fork approach). If FSA is unable to fully deliver Official Controls due to a lack of OV workforce, many meat establishments will be unable to operate. This could also present a number of significant risks such as: **unsafe meat being placed on the market** via other routes, **no or reduced meat produce** available for consumers and **reduced international trade in meat products**, alongside animal welfare issues for animals unable to move to slaughter and a financial impact on FBOs through loss of earnings.
8. The FSA employs **77 vets directly** (in roles covering approval of meat establishments, audits and assurance of meat establishments, professional veterinary advice and trade related matters) and our Service Delivery Partner (SDP) supplies **268 OVs** who deliver the FSA Official Controls in FSA approved abattoirs and approved game handling establishments across England and Wales.
9. In relation to meat controls the FSA charges FBOs. For 2023/24 the chargeable cost of the controls provided to FBOs in England and Wales is forecast to be £50m with income of over £34m after discounts are applied (approximately £16m).

Legislative Context

10. The FSA supports the need to reform and modernise the 1966 Veterinary Surgeons Act (VSA) which regulates the UK Veterinary Profession. The current legislation is out of date and holds us back from having a more agile and modern workforce including the role of OVs.

Challenges the FSA Faces

11. The FSA outsources its requirement for OVs and approximately 50% of our MHIs in England and Wales. This contract has been retendered on a regular basis. The current sole supplier SDP has been awarded the contract both as part of multiple SDPs and as a standalone supplier with the FSA, (and its predecessor the Meat Hygiene Service), through open competition tender exercises to ensure qualified and competent personnel are provided to all FSA approved meat premises to perform Official Controls duties.
12. In 2021, as a result of the cumulative impacts of Covid, EU Exit, and an increased demand for veterinary services across the profession, the SDP OV numbers declined considerably, putting FSA service delivery, and the ability of abattoirs to operate, at risk.
13. As an interim measure in June 2021 the RCVS granted FSA permission to use their Temporary Registration (TR) approach. This allows vets from European Association of Establishments for Veterinary Education (EAEVE) accredited universities to temporarily

register and work under the supervision of a Member of the Royal College of Veterinary Surgeons (MRCVS) “Supervising OV” for 12 – 18 months whilst they work towards gaining (IELTS) level 7 English, which is the requirement to practice as a vet in the UK. The Temporary Registrant must hold the International English Language Testing System (IELTS) level 5 English which is defined as a modest user of the English language with ability to understand the meaning of conversation in most situations. The RCVS reviewed the permission in June 2022 and again in June 2023, extending permission to use the TR scheme until end of December 2024 with an agreement to apply (IELTS) level 6 English, defined as a competent user with the ability to use and understand fairly complex language. The FSA together with its SDP has worked hard towards reducing reliance on this scheme by creating alternative recruitment pathways which incorporate language training, improve retention and reduce attrition.

14. The recent [Home Office net migration announcement](#) to increase the earning threshold for overseas workers from its current position of £26,200 to £38,700 from 4 April 2024 has further implications for the FSA, our SDP and their ability to recruit overseas vets using the MHI (vet track) pathway. The average MHI salary is just over £28,000, so when the new cap is implemented, it will have knock-on effects across the recruitment pipeline and could increase costs to the SDP. This in turn will impact on the industry, who pay a percentage of service costs, the taxpayer and, ultimately, the price of meat to consumers.

How this impacts the consumer

15. FSA consumer research published in July 2023 via a “[Food and You 2](#)” survey demonstrates that 78% of those with some knowledge of the FSA trust us to make sure food is safe and what it says it is. Furthermore 82% of respondents reported confidence in FSA when protecting the public from food related risks.

The top concerns for consumers are food prices (87%), food poverty and inequality (77%), and animal welfare in the food production process (32%).

Additionally, an industry report* released in 2021, states that 89% of interviewed consumers answered that the welfare of the animals is one of the most important factors when choosing their products.

16. Without a sustainable OV workforce there is a significant risk of consumers’ expectations, and crucially, regulatory requirements not being met. The implications would potentially mean putting consumers’ health and confidence in the FSA at risk.

*[Understanding consumers attitudes to animal welfare | AHDB](#)

Actions to mitigate workforce shortages

17. Against this backdrop the FSA, and our SDP, have been implementing mitigating shorter term measures to stabilise the OV pipeline whilst searching for long-term solutions to address the challenges around recruitment and retention of OVs.

18. The interim use of the RCVS TR scheme has enabled our SDP to rebuild OV numbers in abattoirs to pre-covid and pre-EU exit levels. It has also supported critical government veterinary roles, as OVs who progress in their career typically move to roles supporting food security, trade, and animal health and welfare. Using learning gained through the utilisation of the TR scheme, we have worked with our SDP to adapt our use of TR, so that candidates now enter the scheme holding level 6 English, which, alongside a better understanding of the support needed, enables them to have a higher chance at passing their Level 7 English. Early indicators suggest this is having a positive impact, with candidates achieving the required language level in a shorter time period compared to early 2023.
19. Further to this, our SDP has implemented retention strategies for OVs, that have achieved level 7 English, which include financial incentives, role variation, career pathways and training opportunities. Internal feedback highlighted that OVs enjoy the delivery of Official Controls in abattoirs but that it is challenging work, and therefore the ability to do different tasks during their week is intended to reduce attrition, improve OV mental wellbeing and aid recruitment into Veterinary Public Health roles. The SDP continues to monitor this strategy with early signs of positive impacts on retention.
20. To reduce reliance on the TR measure, in 2023 our SDP also developed and implemented the MHI (Vet Track) pathway whereby vets qualified from EAEVE accredited universities and who hold Level 5 English are recruited on a 2-year MHI visa. This enables vets to work whilst studying for the Level 7 language qualifications required for full RCVS registration and which then allows them to become novice OVs under a new Veterinary Surgeon visa. We expect to begin to see the impact of this scheme from July 2025.
21. Within the FSA, we have continued to develop our pay offer. In 2023 we identified SEO veterinary roles ('Senior Executive Officer' which in broad terms is a middle management position) as an area of priority and subsequently added them to our higher Market-Facing / Niche salary band. This is for roles we have identified as being in high demand across sectors and attract a higher rate of pay in the wider market, and/or there are few individuals with the skills nationally, and which resulted in an average pay increase for FSA SEO veterinary roles of £3,700 per annum.
22. In parallel, we continue to work on a number of initiatives looking at the medium- and longer-term solutions with our SDP, other Government departments, and the wider profession through the British Veterinary Association (BVA) and, the RCVS.
23. The current contract with our SDP for the Delivery of Official Controls runs until 31 March 2025 and the retender process has begun. The new contract will be based on the existing outsourced delivery model but will seek to increase resilience in the marketplace by encouraging interest and bids from a wider range of potential suppliers.

24. To enhance veterinary students' knowledge and awareness of vital veterinary public health (VPH) roles, both the FSA and our SDP have developed and implemented Extra Mural Studies (EMS) work experience programmes, with excellent student feedback. The aim of EMS is to enable veterinary students to gain practical experience in as many aspects of veterinary work as possible. FSA specific week-long EMS placements, focus on both field and office-based work, allowing students to experience various veterinary roles available in the FSA. Students gain knowledge of veterinary work from a non-practice perspective, increasing their awareness and understanding of animal health and welfare, and veterinary public health in relation to food production, including One Health. This builds on both FSA's and our SDP's ongoing work with universities and Vet Schools Council to engage, develop partnerships and increase awareness of veterinary roles in government and specifically in public health.
25. The FSA has also looked at different OV resourcing models to reduce commercial and financial exposure, and to progress some immediate business continuity issues. However, "direct employment" of OVs would have resulted in a combination of increased gross operating costs and FSA pay inflation, would have increased gross annual operating costs by £6-£7m by 2025-2026. This could have only been met through reallocation of FSA spend and significantly increased charges to the meat industry.
26. The Civil Service (CS) Nationality Rules caused further difficulty, as only nationals from the United Kingdom, the Republic of Ireland, the Commonwealth or EU nationals with settled status are eligible to work in the Civil Service. As the majority of vets working in public health within the UK are from overseas it was estimated that only 65% of the required number of OVs met the CS Nationality requirements and would be eligible to transfer to the FSA from our SDP. We did explore an exemption to these requirements with the Cabinet Office but that was not available.
27. Considering all these factors, and the unanticipated economic environment at the time, it was with regret that the FSA decided to put the plans to directly employ OVs on hold. We will of course continue to assess this situation.

Ongoing challenges

28. Despite the actions already taken to address recruitment and retention challenges in the FSA and its SDP, there are external factors like an increased demand for vets due to pet boom, trade and the need for Export Health Certificates in the EU and GB. There are also wider challenges related to work life balance, pay and recent notifiable diseases outbreaks which mean that there are not enough vets entering and being retained in the UK profession to support all the veterinary service demands. Whilst the mitigating actions above have proved positive and delivered a more stable current workforce, without a long-term sustainable change to the system, FSAs ability to protect animal health and welfare, food safety and underpin international trade will remain precarious.

Actions that could support systemic change

29. Any significant systemic change will require a whole sector approach. Two notable potential solutions for consideration include VSA reform and increased financial support for the veterinary sector.
30. Legislative (VSA) reform will support a more sustainable veterinary profession to encompass innovation & technology and to enable vets in the future to be multidisciplinary, working with a range of allied professionals.
31. Increased financial backing could enable changes to government vet remuneration to make this a more attractive chosen route and could support universities to deliver more targeted training in veterinary public health, including increasing student exposure to abattoirs, engaging, and supporting future veterinarians earlier in their education and career journey. We are operating in an increasingly competitive recruitment market, and as government salaries fall behind those on offer in the private sector, this impacts on both recruitment and retention to these vital VPH roles.

March 2024