

# Written Evidence submitted by The British Veterinary Association (BVA)(LS0046)

## Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

## Introduction

- 2) The veterinary profession has a reach and impact on society, despite its relatively small size, with around 24,422 UK-practising veterinary surgeons<sup>1</sup>. The UK veterinary profession is an integral part of the food supply chain using science, experience and practical skills to further animal health, animal welfare, farm productivity and public health. Official statistics put the value of UK livestock outputs at £14.8bn, not a penny of which could be realised without the input of the veterinary workforce.<sup>2</sup>
- 3) Veterinary surgeons work closely with animal keepers to ensure biosecurity and biocontainment measures are implemented. Poor biosecurity can have devastating economic and social consequences. Animal disease outbreaks are a strategic risk on the National Risk Register.<sup>3</sup> The foot-and-mouth disease outbreak in 2001, for example, is estimated to have cost £5billion to the private sector and £3billion to the public sector, damaged the lives of farmers and rural communities and caused a general election to be postponed.<sup>4</sup> More recently, vets were involved in the response to the 2020 Avian Influenza (AI) outbreak, coordinating action in government departments, assisting with the cull and undertaking surveillance visits.<sup>5</sup>
- 4) The important economic, social and political contributions of the veterinary profession would be impossible without EEA 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."*<sup>6</sup>

- 5) The veterinary profession is diverse, with far-reaching influence and impact in all parts of the food system, including:
  - production animal clinical practice, which provides preventive healthcare and treatment for livestock, as well as carrying out disease surveillance, promoting good biosecurity, boosting productivity and maintaining standards of animal welfare;
  - aquaculture, providing the UK sector with dedicated evidence-based veterinary services;

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<sup>1</sup> RCVS Facts 2018, 2020 <https://www.rcvs.org.uk/news-and-views/publications/rcvs-facts-2018/?destination=%2Fnews-and-views%2Fpublications%2F%3Fp%3D3>

<sup>2</sup> Defra, DAERA, Welsh Government, Scottish Government, Agriculture in the United Kingdom 2018, 2019 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/815303/AUK\\_2018\\_09jul19.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/815303/AUK_2018_09jul19.pdf)

<sup>3</sup> Cabinet Office, National Risk Register of Civil Emergencies 2017, 2017

<sup>4</sup> National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002

<sup>5</sup> What it's like working on the ground during a bird flu outbreak <https://vets.blog.gov.uk/2018/01/02/369/>

<sup>6</sup> 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-environment-subcommittee/Brexit-farm-animal-welfare/Gov-Brexit-farm-anim.pdf>

- abattoirs and throughout the food chain, where veterinary certification is key to securing public health, food safety, animal welfare and assurance for consumers in domestic and foreign markets;
  - veterinary schools and independent research laboratories, which advance our scientific understanding of veterinary medicine and animal production systems;
  - industry and technology, ensuring the UK remains competitive and forward thinking in many areas; and
  - veterinary surgeons working in the civil service, who provide veterinary expertise to public policy making.
- 6) Consequently, to ensure the continued resilience of the UK food chain and the agricultural economy, the capacity of the veterinary workforce must be a priority.

## **Demands on veterinary capacity**

### **Facilitating trade**

- 7) Veterinary surgeons both certify and supervise the import and export of animals and animal products. The vital role of veterinary surgeons in trade, protecting public health, food safety, animal health and animal welfare is recognised around the world. Since January 2021, there has been increased demand for veterinary certification and supervision, and there will be further demands on the veterinary workforce. The UK needs enough vets in place to meet these additional demands.
- 8) The UK will require a veterinary workforce with the capability and capacity necessary to facilitate international trade both with the EU and other trade partners. To continue to trade, the UK must have enough appropriately trained Official Veterinarians (OV) to meet the additional demands for export and import certification. If that requirement is not fulfilled, it will present a significant barrier to trade and limit any opportunities for the farming and food sectors that may be found in a new free trade agreement (FTA).
- 9) From January 2021, exporters have required an export health certificate (EHC) signed by an OV to transport animals, products of animal origin or germplasm from Great Britain to the EU Single Market. The OV signature attests that relevant public health and animal health requirements have been met.
- 10) This has created a huge workload for the profession although, to date, we are not aware of any consignment failing to leave Great Britain for lack of an available OV. This is in part thanks to the fact that the number of vets in Great Britain who have become qualified as OVs to sign EHCs for animal products has tripled from 600 in February 2019, to over 1,800. There has also been the introduction of a Certification Support Officer (CSO) role. These allied professionals work under the direction of an OV, providing support by collecting the evidence required for the OV to complete an EHC. However, we are aware that capacity is now stretched with little potential for significant expansion.
- 11) Estimates provided by the SPS Certification Working Group,<sup>7</sup> suggest that for the first eight months of 2021, 204 years of certifier time have been required just to export products of animal origin and livestock to the EU.

### **EU EHCs issued 2020 vs 2021 by month**

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<sup>7</sup> The Working Group is made up of food and feed trade associations, hauliers, farmers and veterinary and environmental health professional organisations, working together to minimise trade friction in Export Health Certificate (EHC)/SPS products between GB and the EU/NI by identifying issues and proposing solutions to Government and its Agencies.

Month	Year		% change
	2020	2021	
January	303	37256	12296%
February	188	24546	13056%
March	315	27188	8631%
April	88	20797	23633%
May	114	19271	16904%
June	185	37490	20265%
July	152	21078	13867%
August	416	26362	6337%
Cumulative total	1761	213988	12152%

#### Certifier Burden Running total 2021

certifier hours (@2h/cert)	427976
certifier days (8h)	53497
certifier years (262d)	204.2

Last updated: 7 September 2021

- 12)** In addition, 40,000 EHCs were issued between the start of the year and May for Great Britain-Northern Ireland movements of animals and products of animal origin (POAO).<sup>8</sup>
- 13)** Despite this significant increase in workforce, further additional expected demands on veterinary capacity are yet to materialise. As a result, we are not confident that the UK will have sufficient vet capacity to meet further demands. As the provisions of the Scheme for Temporary Agri-food Movements to Northern Ireland (STAMNI) begin to be phased out, EHCs will also be required for goods moving from Great Britain to Northern Ireland. The STAMNI grace periods were expected to begin phasing out from 1 October 2021. However, on 6 September 2021, the government announced they will continue to operate the Northern Ireland Protocol on the current basis. Grace periods and easements that had been due to expire will continue “to provide space for potential further discussions”.<sup>9</sup>
- 14)** When the STAMNI arrangements are removed this will see demand for EHCs in Great Britain increase. The latest Defra estimate is that demand for EHCs may increase 70,000-150,000 per year as a result. This is estimated to require up to 70 full time equivalent OVs. Previous Defra estimates, based on a survey conducted prior to the end of the transition period, found that on average an OV spent approximately 15% of their working week on certification. Defra expected this percentage to increase with the greatly increased demand and increasing specialisation and used a range of 10% to 30% within their preparatory work. Using this same range, 70 FTE OVs could require between 233 and 700 actual vets.
- 15)** There will also be the need for OVs to perform import checks once sanitary controls are phased in for imports into GB from the EU. Defra funded £14 million in England to support recruitment and training of over 500 new staff, including OVs.<sup>10</sup> On 14 September 2021, a

<sup>8</sup> House of Lords European Affairs Committee 2nd Report of Session 2021-22 HL Paper 55 Report from the Sub-Committee on the Protocol on Ireland/Northern Ireland

<https://publications.parliament.uk/pa/ld5802/ldselect/ldEUaff/55/55.pdf>

<sup>9</sup> <https://questions-statements.parliament.uk/written-statements/detail/2021-09-06/hlws257>

<sup>10</sup> <https://www.gov.uk/government/news/funding-for-new-checks-on-animal-products-creates-500-jobs>

Parliamentary Statement was released announcing a postponement of border checks that were due to begin to be phased in from 1 October. There has been no consultation with the veterinary profession and no assurances have been provided by Government that all relevant biosecurity risks associated with this delay have been assessed and managed.

## Official controls in abattoirs

- 16) The Food Standards Agency (FSA) estimates 95% of the veterinary workforce in abattoirs graduated overseas – with the clear majority of these coming from the EU. Losing veterinary surgeons from slaughterhouses would increase the risk of food fraud, provide the potential for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could increase the risk of an infectious disease outbreak and jeopardise valuable export markets.
- 17) We know that government is concerned about OV capacity, and what this increase in EHC OV demand will mean for the other vital roles undertaken by vets. This is particularly in relation to the operation of official controls in abattoirs.
- 18) The Food Standards Agency and Defra have put in place contingency procedures for abattoir OVs in England and Wales. RCVS has agreed to admit to its temporary register vets who are unable to meet the requisite level 7 International English Language Testing System (IELTS) qualifications. To make use of this mitigation, vets will be required to:
  - have a contract of employment to work as an OV providing meat hygiene controls;
  - have the necessary skilled worker visa including IELTS at level 5; and
  - hold European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary degrees and
  - have completed and passed the meat OV training course.
- 19) This temporary registration will last for 12 months, with the possibility of an extension of six months, during which time the temporary registrant will be expected to pass the IELTS level 7 test. Whilst on the temporary register, the individual's role will be limited in scope and under the supervision of a registered veterinary surgeon.
- 20) This FSA contingency for abattoir OVs is now in operation. A similar provision has been put in place to allow EHC OVs to register in the same way but has yet to be triggered by the Defra Secretary of State.
- 21) BVA recognises the need for this contingency and has supported its use with the caveat that it should not lead to a two-tier system and that longer-term there must be innovative solutions found to develop the current model and improve reward and recognition.
- 22) FSA has recently consulted on early proposals for reform of FSA-delivered Official Controls in the meat sector in England and Wales.<sup>11</sup> The proposed Future Delivery Model is based around seven principles under the headings: trust and food safety, accountability, technology, responsiveness, international trade, value for money, and resource availability. The proposal includes a move away from the existing FSA controlled 'one size fits all' model towards a tailored, risk-based approach with industry having responsibility and accountability for parts of carcass inspection.
- 23) The proposal recognises that Service Delivery Partners (SDP) recruitment and retention figures continue to pose a risk, with FSA dependent on the SDP for 99% of OVs and over half of Meat Hygiene Inspectors. The current recruitment landscape for OVs requires a more balanced and resilient solution, with increased job satisfaction and improved career pathways.

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<sup>11</sup> [https://www.food.gov.uk/sites/default/files/media/document/early-proposals-for-a-future-delivery-model-for-fsa-delivered-official-controls-in-the-meat-sector\\_0.pdf](https://www.food.gov.uk/sites/default/files/media/document/early-proposals-for-a-future-delivery-model-for-fsa-delivered-official-controls-in-the-meat-sector_0.pdf)

## Veterinary demands in farm animal practice

- 24) BVA is aware of concerns regarding capacity within farm animal practice. There has been reporting of veterinary shortages in farm animal practice.<sup>12</sup> Erosion of the veterinary workforce, including in farm animal practice, has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU. Considerable efforts are underway to retain graduates within the profession.
- 25) BVA has held a seat on the steering group that is designing the Animal Health and Welfare Pathway, which is a central component of the UK Government's plans for future farming in England. The Pathway maps out how farmers, vets and government will work together to deliver sustained improvement in animal health and welfare over time.
- 26) At the heart of the pathway will be an annual health and welfare review. From 2022, livestock farmers with commercial cattle, sheep and pigs who are eligible to claim Basic Payment Scheme (BPS) will be eligible for a Defra-funded, vet-led annual health and welfare review. During the visit, the vet and farmer will be able to decide on priority actions specifically to improve that farm's health, welfare and productivity, alongside medicine reviews, key data collection and testing for certain endemic diseases.
- 27) The Pathway will rely on collaboration between vets and farmers. This offers vets an excellent opportunity to renew their relationships with clients and work together to improve animal health and welfare outcomes on farm. However, an ambitious agriculture policy will not achieve its aims if there is insufficient veterinary capacity within farm animal practice. We are working closely with Defra on the design of the annual review to ensure veterinary capacity is utilised efficiently.
- 28) This is a devolved policy area. In Scotland, Wales and Northern Ireland proposals are being developed and we are engaging to ensure the value of the vet-farmer relationship is at the heart of future farming policy and efficient use of the veterinary workforce is considered.

## Meeting veterinary capacity

- 29) How the UK will find the required veterinary capacity to fulfil increasing demands in the food chain is unknown. The Major Employers Group (MEG), which represents some of the largest UK veterinary businesses providing primary care, conducted a survey looking at vacancy rates amongst its members in November 2018. The results showed that there were 890 vacancies in member practices employing over 7,700 veterinary surgeons providing primary care directly to the public in the UK. This represented a veterinary workforce shortage of approximately 11.5%.
- 30) In the Migration Advisory Committee review of the Shortage Occupation List published in May 2019,<sup>13</sup> this shortage of vets was recognised:

*"It is clear from the stakeholder evidence that they [vets] are facing significant recruitment difficulties. Furthermore, the SOC code ranks 44th in the shortage indicators which indicates it is in relative shortage compared to other occupations. The vacancy rate has been increasing over recent years, apart from a dip in 2016/17, however, still above average."*

## Vets from overseas

- 31) The UK is highly reliant on EU vets. According to the Royal College of Veterinary Surgeons (RCVS), on 19 January 2021, there were 27,324 UK practising vets. Of these, 7,936 graduated in the EU (29% of the total). In recent years, more veterinary surgeons who registered in the UK qualified in the EU than in the UK. In 2019, RCVS data on where new registrants graduated showed the following:

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<sup>12</sup> <https://www.bbc.co.uk/news/uk-england-lincolnshire-57802728>

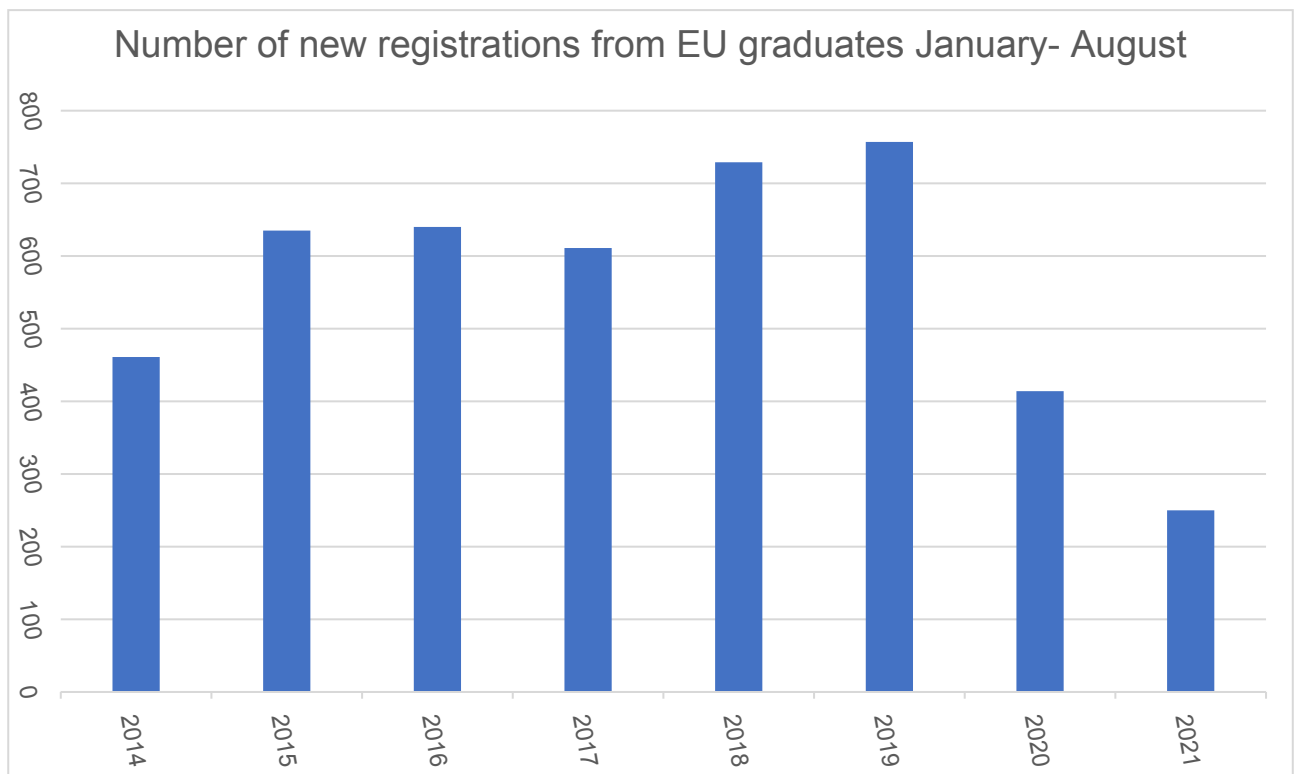
<sup>13</sup> Full review of the shortage occupation list, May 2019 <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

- 48%- EU/ EEA
- 42%- UK
- 10%- 3rd countries

**32)** Free movement of people and the mutual recognition of professional qualifications (MRPQ) had an enormous beneficial impact on our veterinary workforce. The end of free movement has created additional barriers to the movement of EU-qualified vets to the UK.

**33)** According to figures provided by the RCVS, between January and August 2021, 250 EU vets registered in the UK. By the same point in 2020 this figure was 414. Free movement was in operation during 2020, however, this figure was likely suppressed due to Covid-19 related restrictions. Therefore 2019 offers the most useful baseline as is the last year under free movement without the downward pressure of Covid-19 on immigration. In that year, by the same point, 757 EU graduates had registered in the UK. Therefore, less than a third of the pre-covid, pre-end of transition number has registered so far this year.

**34)** The graph below shows the number of new registrants with the RCVS over the first 8 months of the year (January to August) from 2014 to 2021.



**35)** On 4 October 2021, The Council of the RCVS voted to introduce more flexibility into the requirements for English language testing of overseas-qualified veterinary surgeons wishing to join the RCVS Register. The Council agreed that this small degree of flexibility would facilitate access to the RCVS Register for more overseas-qualified veterinary surgeons.

**36)** Until recently, any overseas-qualified veterinary surgeons wishing to sit the RCVS Statutory Examination for Membership, or to apply for full registration to practise in the UK, would need to have achieved Level 7 in IELTS across all components, i.e., listening, reading, writing, and speaking. RCVS Council agreed that it would be acceptable for veterinary surgeons to achieve IELTS Level 6.5 in any one of the four test components, so long as the average score across all components remained at least Level 7.

## Education

- 37)** The UK has taken steps in recent years to expand the number of veterinary undergraduate places.<sup>14</sup> This includes increases to the capacity in a number of existing veterinary schools and the establishment of new veterinary schools and partnerships.
- University of Surrey School of Veterinary Medicine (which produced its first graduates in 2019)
  - Harper and Keele Veterinary School (first intake in 2020 with first graduates in 2025)
  - University of Aberystwyth/Royal Veterinary College training hub (first intake in 2021 with first graduates in 2026)
  - The University of Nottingham School of Veterinary Sciences increased its student numbers in 2020 via a dual intake, which sees 150 undergraduates start at the school in September, followed by a further 150 in April.
- 38)** There are also future plans for the University of Central Lancashire (UCLan) to welcome its first intake of veterinary medicine students in 2023 before graduating in 2028. Scotland's Rural College is likely to take its first cohort of veterinary students in the autumn of 2023 with graduates emerging in 2028. In Northern Ireland, the Department of Agriculture, Environment, and Rural Affairs (DAERA) has commissioned an options analysis on veterinary education in Northern Ireland with a view to establishing a vet school in Northern Ireland.
- 39)** It would not be possible to further expand the capacity for veterinary education in UK universities at short notice. Increasing capacity takes time, planning, money (both initial capital and ongoing revenue), and personnel. As an example, at present, it is estimated that the full cost of veterinary education is well in excess of £20,000 per student, per year of study.<sup>15</sup> Despite existing funding mechanisms, the cost of providing undergraduate veterinary education exceeds current direct income streams.<sup>16</sup> Expanding the numbers of UK graduates must be supported by additional Government funding in order to safeguard existing quality and standards in veterinary education.
- 40)** Further, UK students are currently subsidised by the high fees of overseas students; a re-balancing in favour of producing more domestic graduates would therefore jeopardise the funding model of some veterinary schools, requiring more additional funding per UK student place.
- 41)** Furthermore, UK graduates tend to favour clinical practice over public health roles. A significant cultural change will be required to reduce the existing reliance on overseas-qualified veterinary surgeons in this area.

## Allied professionals

- 42)** Consideration is also being given to how the veterinary team can be reformed to permit allied professionals to take on additional tasks, and allow vets to use their time and expertise more efficiently.
- 43)** In response to the expected increase in demand for EHCs, the Animal and Plant Health Agency (APHA) has introduced the role of Certification Support Officers (CSOs). CSOs work

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<sup>14</sup> RCVS Facts 2017 demonstrates an increase in veterinary undergraduate student numbers from 804 in 2006-2007 to 1011 in 2016-2017.

<sup>15</sup> Veterinary Schools Council, 2017. Maintaining excellence and sustainability in UK veterinary education and research post-Brexit <https://www.vetschoolscouncil.ac.uk/wp-content/uploads/2017/05/Veterinary-education-research-post-Brexit-VSC.pdf>

<sup>16</sup> Ibid

under the direction of the Official Veterinarians responsible for signing export health certificates relating to POAO. The act of certification is still undertaken by a veterinary surgeon.

- 44) In England, we are aware that a number of practices have opted to employ and train Approved Tuberculin Testers (ATTs) to support their TB testing commitments. BVA has previously welcomed the move to train ATTs, following a successful pilot study by the APHA. The fact that practices are now able to train up ATTs has been a relief for farm practices during a time when many areas have moved to 6 monthly testing and the ability to source new veterinary staff has been curtailed.
- 45) Further reform needs to be undertaken in a measured way that prioritises animal health, animal welfare and public health and does not undermine either the role of the veterinary surgeon in diagnosis or the integrity of the veterinary surgeon's signature. In 2019, BVA developed its own position on the vet-led team,<sup>17</sup> with a hub and spoke model at its core. In this model the veterinary surgeon acts as the hub for treatment, directing to the most appropriate allied professional (the spokes), who refer back to the vet for further direction whenever necessary. This model allows for a co-ordinated approach, with the appropriate and efficient use of skills and better animal health and welfare and public health outcomes.

### Impact of wider workforce shortages on animal health and welfare

- 46) Workforce shortages in the farming and food sectors, beyond the veterinary profession and allied professions, will have negative consequences for animal health and welfare. Farming is incredibly integrated. Therefore, while we focus on the impact on livestock agricultural sectors below, it is worth noting that labour shortages in arable farming will affect input in animal agriculture such as forage and the bedding.

#### Poultry

- 47) The UK poultry meat sector is heavily reliant on labour from foreign nationals at all stages in the supply chain (breeding farms, hatcheries, broiler chicken farms, catching poultry, transport of poultry and feed, and in the abattoir). As with many sectors, the poultry industry has been severely affected by the current labour shortage. The main challenges have been in abattoirs where labour shortages have severely reduced the number of birds that can be processed each day. These delays further along the supply chain are causing consequences on farm.
- 48) Modern chickens are capable of growing at up to 100g per day. Consequently, even a short delay of a few days on farm can lead to issues surrounding stocking density. Thus far stocking density, and therefore welfare, of broiler chickens have been maintained. To do this, the industry has had to remove parent flocks earlier than planned to reduce the supply of new broiler chickens to abattoirs, thus ensuring they can cope with the supply. The British Poultry Council has reported that their members have been forced to cut back weekly chicken production by 5-10%, all year-round turkey production by 10% and estimate Christmas turkey production to be cut down by around 20%.<sup>18</sup>

#### Pigs

- 49) Pig farming is a continuous process where pigs are produced for weekly sale with the same number ready to go to the abattoir each week and enough space on farm to produce these numbers on time. Much UK pig production is multisite i.e. pigs are bred and raised to weaning on one site, grown from weaning to 30-40 kg on another site, and finished on a third site, or a combination of these. Although the breeding units will produce weaners continuously most of the other accommodation is on an all-in all-out basis with pigs on site for weeks or months depending on the type of production. A producer would have a number of these sites and fill and empty them on a rotation.

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<sup>17</sup> <https://www.bva.co.uk/take-action/our-policies/the-vet-led-team/>

<sup>18</sup> <https://britishpoultry.org.uk/government-is-twiddling-its-thumbs-while-poultry-meat-production-suffers/>



- 50)** There is limited spare capacity within the system, beyond that required under Red Tractor. This required contingency is designed to allow abattoirs to occasionally delay the purchase of pigs for a short period and allows the farms to process any excess pigs over the next few weeks. This is called “rolling back” or “rolling over.”
- 51)** Rolling back in farrow-to-finish farms results in excess pigs at a heavier weight than would normally be sold. During this time farmers will have to bear the additional costs associated with accommodation and feed. These pigs are also worth less than they would have been at the usual slaughter weight as they will not meet the contracted weight and especially back fat requirements. This will impact the finances of the farm.
- 52)** If a finishing yard can't be emptied then it can't be filled, this means the weaner yard can't be emptied so it can't be filled so there is pressure on the breeding site. The backlog here is worse as all the pigs will be the same age, so all pigs will be becoming too big together. A normal contingency for moving weaners and growers would be to utilise any spare capacity in the system to send them to an alternative site. However, this is now disappearing, and pigs are backing up. This is causing particular concern on outdoor breeding units which do not have facilities to hold hundreds of newly weaned piglets.
- 53)** Our biggest concern here is the welfare of the pigs as numbers on farm rise. We will see farms which are illegally overstocked. Overstocking leads to a fall in pig welfare and an increase in aberrant aggressive behaviour, widely referred to as vice. Much of this overstocking will be legal as many of our pigs are finished in straw yards at much lower stocking levels than those legally required. However as stocking rates increase in these yards, pigs will have more competition for space, more aggression (as the pigs are older than normal and more sexually active), and higher ammonia levels as more muck is in the bedding. There is also an issue on all farms where bigger pigs are being kept, that the accommodation may no longer be able to contain them. Pigs are inquisitive and quite destructive and being bigger and heavier gives them more ability to do damage to their surroundings.
- 54)** The Pig Veterinary Society sought feedback from its members on the above issues. They found that virtually all pig producers are affected by this issue now. Industry believes there are about 120,000 extra pigs on farm now<sup>19</sup> and this has been increasing at up to 15,000 pigs a week.<sup>20</sup>
- 55)** There have been media reports indicating that there is a need to cull pigs to stop them being over stocked.<sup>21</sup> Animals that are culled won't go into the food chain, they will either be rendered or sent for incineration. Farmers are only permitted to kill pigs under their care in an emergency, usually due to sickness or injury. Pig vets have been advised by Defra that they do not regard prevention of overstocking as an emergency. This means that if a farm needs to cull its excess pigs, then only a veterinary surgeon or someone with the correct licence under WATOK can do this. There are very limited numbers of people able to perform this task meaning this may not be feasible. There are also massive financial implications to farms in doing this.
- 56)** Piglets on breeding units can't be killed with a captive bolt. For a mass cull it is likely that Pentobarbitone injection would have to be used. Veterinary surgeons would be required to prescribe as this is a prescription only drug (POM-V). This is also a time and labour-intensive process.

## **Cattle**

- 57)** Until recently, many farm workers (mostly dairy) came to the UK from the EU for blocks of time (e.g., 3 months) and then returned home for an equal block of time and “rotate” with another

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<sup>19</sup> <https://www.theguardian.com/business/2021/oct/01/uk-pig-industry-warns-butcher-shortage-mass-cull>

<sup>20</sup> [http://www.npa-uk.org.uk/iqs/dldbitemid.440/dlsfa.view/Press\\_Releases.html](http://www.npa-uk.org.uk/iqs/dldbitemid.440/dlsfa.view/Press_Releases.html)

<sup>21</sup> <https://www.insider.com/100000-pigs-could-be-destroyed-because-of-severe-labor-shortage-in-uk-2021-9>

group of workers. Many of these workers don't qualify for the definition of "skilled worker" under the government's new points-based visa system. The result is that, when they go home, they can't come back to the UK. This is leaving a shortage of workers for manual-based work such as milking, calf feeding, tractor work and bedding up. Understaffing is having an effect on the welfare of the cattle. Difficulty recruiting leads to a lack of continuity, poor communication and a loss of husbandry skillsets which ultimately lead to a shortfall in the care provided to the livestock.

### Sheep

**58)** The Government's sheep welfare code states that farmers should remove the fleece from all mature sheep at least once a year. This is essential for health and welfare, reducing both the risk of heat stress and maggot infestation. Thankfully, concerns regarding lack of shearers during the early part of the COVID19 pandemic did not materialise. However, this was mainly due to a mobilisation of other farmers, farm workers and retired shearers returning to work to meet demand. It is uncertain whether there may be a shortfall of shearers in future years, with consequential health and welfare concerns.

### HGV drivers

**59)** There has been a well-publicised shortage in the haulage industry and, as demands on HGV drivers continue to grow, there is some concern that livestock hauliers may move from this sector to other industries. Delivery of animal feed may be negatively affected for the same reason. There is anecdotal evidence of problems in some areas finding drivers at short notice. A lack of livestock hauliers may have many negative consequences. One example is that this may impact the timely collection, from holdings in areas that are eligible, of carcasses for delivery to APHA Veterinary Investigation Centres, where post-mortem examination of livestock is undertaken for surveillance purposes.

### Conclusion

**60)** As can be seen from the evidence provided above there are serious concerns about the ability of the veterinary workforce to meet increasing demands. Furthermore, like many sectors emerging from the pandemic, the veterinary profession is already exhausted. We're facing a triple whammy of Brexit, Covid, and the boom in pet ownership, which have put unprecedented pressure on veterinary services across the country.<sup>22</sup> The increase in pet ownership will have a knock-on effect on farm animal work and we are hearing anecdotal reports of vets in mixed practice being required to spend more of their working day on companion animal work to fulfil demand.

**61)** It was expected that additional certification demands on the veterinary profession would begin from 1 October 2021. The government has now delayed both the introduction of border controls on goods entering Great Britain from the EU, and the initial phasing out of the STAMNI arrangements for goods moving to Northern Ireland from Great Britain. Consequently, there is now an opportunity for government to engage with the veterinary profession and wider industry, to undertake a thorough analysis of the workforce needs of these changes and put in place measures to meet those needs.

**62)** Workforce shortages across the farming and food sectors will have negative consequences for animal health, animal welfare and public health. We are particularly concerned about the livestock backlog on farms created by staffing shortages. We urge the Government to work with industry to find solutions, particularly in relation to animal health, animal welfare and public health.

October 2021

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<sup>22</sup> <https://www.bva.co.uk/news-and-blog/news-article/vet-practices-managing-triple-whammy-of-brexit-covid-and-pet-boom/>