

Written evidence submitted by The British Veterinary Association (BVA) (LFS0031)

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 is relatively small, with around 23,220 UK-practising veterinary surgeons,¹ but its reach and impact are significant. 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, public health and productivity. 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.²
3. Veterinary surgeons work closely with animal keepers to ensure biosecurity measures are implemented. Poor biosecurity can have devastating economic and social consequences. Animal disease outbreaks are a strategic risk on the National Risk Register.³ The Foot and Mouth 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.⁴ More recently, vets were involved in the response to the 2017 Avian Influenza (AI) outbreak, assisting with the cull and undertaking surveillance visits.⁵
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."⁶

¹ RCVS Facts 2017, 2018 RCVS Facts (2017)

² 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/A_UK_2018_09jul19.pdf

³ Cabinet Office, National Risk Register of Civil Emergencies 2017, 2017

⁴ National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002

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

⁶ 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>

5. The veterinary profession is diverse, with far-reaching influence and impact in all parts of the food chain and connected areas, 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
 - 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.

Veterinary capacity

Current capacity concerns

7. 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%.
8. In the Migration Advisory Committee review of the Shortage Occupation List published in May 2019,⁷ 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.”

Additional demands

⁷ Full review of the shortage occupation list, May 2019 <https://www.gov.uk/government/publications/full-review-of-the-shortage-occupation-list-may-2019>

9. Veterinary surgeons, both certify and supervise the import and export of animals and animal products to and from third countries. The vital role of veterinary surgeons in trade, protecting public health, food safety, animal health and animal welfare is recognised around the world. At the end of the current transition period, there will be increased demand for veterinary certification and supervision, and this will create additional demands on the limited capacity of the veterinary workforce. The UK needs enough vets in place to meet these additional demands. No detailed analysis has been undertaken by government to determine the numbers of vets that will be needed to undertake this work.

Exports

10. From January 2021, exporters will require an Export Health Certificate (EHC) signed by an Official Veterinarian (OV) to transport animals, germplasm and products of animal origin (POAO) from Great Britain to the EU Single Market. This includes meat, milk and pet food as well as composite products like pizzas and quiches. Composite products are particularly complex and may require multiple EHCs. For example, a cheese and ham sandwich will require a certificate for both the cheese and ham to provide an audit trail of each individual ingredient.
11. It seems likely that the requirement for EHCs will be similar, whether or not the UK and EU reach a free trade agreement. However, there are material uncertainties and limitations that mean it is not possible to calculate what the exact increase in export health certification requirements will be. When preparing for a no-deal exit the then Chief Veterinary Officer of the UK, suggested that the volume of products requiring veterinary export health certification could increase by as much as 325% in the case of no deal being reached between the EU and UK.⁸

Imports

12. On 10 February 2020, the Chancellor of the Duchy of Lancaster announced that businesses should prepare for border checks for imports from the EU after the transition period ends. Latest guidance⁹ indicates these requirements will be phased in. From April 2021 all POAO will also require pre-notification and the relevant health documentation. From July 2021 there will be an increase in physical checks and the taking of samples. Checks for animals, plants and their products will now take place at GB Border Control Posts.
13. Under these requirements, live animals or POAO would need to be accompanied by an EHC and vets would be required to carry out certification checks for animal products being imported into Great Britain from the EU Single Market. This change means that despite mitigations that have previously been put in place to attempt to meet the

⁸ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brex-it-says-cvo/>

⁹ <https://www.gov.uk/government/news/government-accelerates-border-planning-for-the-end-of-the-transition-period>

increase in certification needed for export checks, it is unlikely, as it currently stands, that the UK will have sufficient veterinary capacity to meet those for imports as well.

14. Following the end of the transition period, the UK will hold the competence for designing its own Sanitary and Phytosanitary (SPS) control regime. It is essential that the veterinary profession is engaged in this process to ensure animal health, animal welfare and public health are upheld whilst using our workforce efficiently and effectively.
15. Furthermore, the final details of the UK's future relationship with the EU are unknown. A veterinary agreement could be reached between the UK and EU. This could form part of a comprehensive trade agreement or be standalone. Given the current symmetry in standards, an agreement like that between the EU and New Zealand could be reached. This could significantly reduce the level of physical checks on both sides. However, this would not eliminate all checks or the need for infrastructure.

Northern Ireland Protocol

16. In our response to the Northern Ireland Affairs Committee inquiry we provide a detailed analysis of the import trade requirements needed for POAO moving between Northern Ireland and Great Britain.¹⁰
17. The Withdrawal Agreement sets out the arrangements to maintain an open border on the island of Ireland after the end of the transition period. Northern Ireland will remain aligned to a range of EU single market rules, including sanitary rules for veterinary controls. Consequently, the requirements for trade relating to Northern Ireland will have unique factors which will have draws on veterinary capacity.
18. The European Commission's Q and A¹¹ says:
 - a. The necessary checks and controls will take place on goods entering Northern Ireland from the rest of the UK, including, for example, Border Inspection Posts to ensure that the necessary sanitary and phytosanitary ("SPS") controls are carried out.
19. A joint committee holds responsibility for determining the practical arrangements for EU supervision of UK implementation and enforcement of specific aspects of the Protocol. There is scope for the joint committee to consider approaches that may limit the need for EHC documents or veterinary checks for goods entering Northern Ireland from Great Britain. However, it would appear this scope is much narrower than that open to customs issues.
20. The final details of the UK's future relationship with the EU, including the operation of

¹⁰ BVA written evidence to Northern Ireland Affairs Committee Unfettered Access: Northern Ireland and customs arrangements after Brexit inquiry <https://www.bva.co.uk/media/3456/bva-written-evidence-to-northern-ireland-affairs-committee-unfettered-access-northern-ireland-and-customs-arrangements-after-bre.pdf>

¹¹ https://ec.europa.eu/commission/presscorner/detail/ro/QANDA_19_6122

the Northern Ireland Protocol, are unknown. However, it appears likely that these requirements for goods moving from Great Britain to the EU Single Market will apply to goods entering Northern Ireland. Therefore, EHCs would likely be required. Northern Ireland ports will also require border infrastructure and qualified official vets in place to perform checks on goods entering Northern Ireland. The requirement for border checks in Northern Ireland would come into effect on 1 January 2021, not the phased approach expected for ports in Great Britain.

21. Article 6(1) on “protection of the UK internal market” provides that the Protocol shall not prevent “unfettered market access for goods” moving from Northern Ireland to Great Britain. It sets out that there will be no restrictions of any kind on goods moving from Northern Ireland to the remainder of the United Kingdom.

Future immigration system

22. The RCVS Survey of the Profession 2019¹² provides data on vets currently registered in the UK:

- 63.9% UK Graduates
- 21.6% in an EEA/EU/EFTA country
- 4.7% Graduated in Republic of Ireland
- 9.8% Graduated elsewhere

23. According to RCVS data, in recent years over half of the veterinary surgeons who register in the UK each year qualified elsewhere in the EEA. This data illustrates our existing reliance on non-UK graduates within the veterinary profession. In the meat hygiene sector, this is particularly acute. The FSA estimates 95% of the veterinary workforce in abattoirs graduated overseas – with the clear majority of these coming from the EU. Losing these Official Veterinarians (OVs) 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 jeopardise trade.

24. Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EEA-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.

25. On 18 February 2020, the government set out its plans for a new immigration system.¹³ Once free movement ends in January 2021, it will be replaced with an employer-led points-based system. This new immigration system leaves a big question about whether the profession will be able to fill the workforce gap created by the end of free movement, when we are already struggling to recruit and retain vets. A visa-based

¹² The 2019 Survey of the Veterinary Profession <https://www.rcvs.org.uk/news-and-views/publications/the-2019-survey-of-the-veterinary-profession/>

¹³ Policy paper The UK's points-based immigration system: policy statement Published 19 February 2020

system will place significant administrative and financial burdens on veterinary businesses, who will be required to sponsor recruits from outside of the UK.

26. Furthermore, if the UK establishes additional barriers this could make other countries within the EEA more attractive for EEA vets. They will be able to provide certainty to EEA vets and frictionless access to residency and work. Progress has been made in the EU to hire vets to undertake additional veterinary checks on animals and products of animal origin from the UK. For example, the recent Irish Budget provided €7m for staff and IT costs arising from additional import control and export certification requirements arising as a result of Brexit.
27. According to the RCVS, across UK veterinary schools there were 5,295 veterinary undergraduate students in 2017 (over a five-year course). Of these, 129 were from the EU and 1,016 were from third countries.¹⁴ Therefore, we welcome the proposal to allow international graduates a period of two years after graduating during which they can apply to switch their UK study visa to a UK work visa from outside the UK. This could permit some of these third-country graduates to remain in the UK, where they have gained their clinical skills.

Other efforts to support capacity

Education

28. The UK has taken steps in recent years to expand the number of veterinary undergraduate places.¹⁵ 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) and the University of Aberystwyth/Royal Veterinary College training hub.
29. There are concerns about how quickly the capacity of UK universities could be further expanded to meet a massively increased demand at short notice. Increasing capacity takes time, money (both initial capital and ongoing revenue), and personnel.
30. The University of Surrey announced plans to open the school of veterinary medicine in October 2012; the first cohort of students will not graduate until 2019. The Surrey veterinary school cost £45 million to establish.
31. At present, it is estimated that the full of cost of veterinary education is well in excess of £20,000 per student, per year of study.¹⁶ Despite existing funding mechanisms, the cost of providing undergraduate veterinary education exceeds current direct income streams.¹⁷ Expanding the numbers of UK graduates must be

¹⁴ RCVS Facts 2017

¹⁵ RCVS Facts 2017 demonstrates an increase in veterinary undergraduate student numbers from 804 in 2006-2007 to 1011 in 2016-2017.

¹⁶ 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>

supported by additional Government funding in order to safeguard existing quality and standards in veterinary education.

32. 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.
33. Furthermore, UK graduates do favour clinical practice over public health roles. A significant cultural change would be required to reduce the existing reliance on overseas-qualified veterinary surgeons in this area.

Retention of existing workforce

34. Considerable efforts are underway to retain graduates within the profession. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.
35. Together, RCVS and BVA launched the report “Vet Futures – Taking charge of our future”¹⁸ in November 2015. The Vet Futures project aims to improve retention of the existing veterinary workforce by ensuring veterinary professionals are confident, resilient, healthy and well supported, and benefit from exceptional leadership. In July 2016, the Vet Futures Action Plan,¹⁹ was launched with a series of actions to make this vision a reality. These actions are ongoing, and a review of the project is underway.

Paraprofessionals

36. Consideration is also being given to how the veterinary team can be reformed to allow paraprofessionals to take on additional tasks, freeing up veterinary time. In response to the expected increase in demand for EHCs, the Animal and Plant Health Agency (APHA) has introduced the new role of Certification Support Officers (CSOs). CSOs work 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.
37. Further reform needs to be undertaken in a measured way that prioritises animal health, animal welfare and public health and does not undermine the role of the veterinary surgeon in diagnosis or the integrity of the veterinary surgeon’s signature. This work is being undertaken as part of the RCVS Legislation Review.

¹⁷ Ibid

¹⁸BVA, RCVS *Vet Futures – Taking charge of our future*, 2015

<<https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>>

¹⁹ BVA, RCVS *Vet Futures Action Plan 2016-2020*, 2016

<[https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016\(5\).pdf](https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf)>