

that animals are sentient beings.+At present this is no longer the case in the UK and should be rectified with legislation as a matter of urgency as BVA has urged government to do for some time.

2. Will vet availability be a constraint on the operation of the new arrangements in the UK? If so, what is the extent of the shortfall, and what are its causes?

- 9) From 1 January 2021, there has been an increased demand for veterinary certification and supervision for goods including live animals, POAO and germplasm as well as pet animals and equines moving between Great Britain and the EU Single Market and between Great Britain and Northern Ireland. Additional veterinary capacity is needed to fulfil this demand. However, quantifying how much additional capacity is difficult. It is still too early to tell if the UK has sufficient veterinary capacity at present to do this. Many operators are still waiting and delaying some of their exports. For example, the capacity for the certification of travelling pets will currently be less than usual given the covid-19 travel restrictions. Thus far, veterinary capacity has not yet been a barrier and we welcome the work that has been done by government to increase that capacity.
- 10) Our understanding from discussions with the UK government, EU contacts and industry is that during the month of January exports have been well below the level that would typically be expected. Engagement with French authorities has provided that in the first few days of January, traffic from GB to France was only 30% of its usual amount, and it is at approximately 60% as of 14 January 2021. However a large percentage of the lorries were arriving in France empty. The proportion of batches that require SPS checks is around 5%, compared to 10% in usual times.
- 11) Further demands for additional veterinary capacity in Great Britain to sign EHCs are expected. The current grace period that is in place for movements from Great Britain to Northern Ireland that removes the requirements for the majority of EHCs will come to an end on 1 April 2021.
- 12) There will also be the need for OVAs to perform import checks once sanitary controls are applied on imports into Great Britain from the EU. 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 at Great Britain Border Control Posts.
- 13) Where the Great Britain BCPs will be located is still uncertain. In the Border Operating Model, which was updated in October 2020, the government notes that BCPs are not to be located at ports and border locations but where this is demonstrated not to be possible, HMG will consider other options. More certainty is needed. Putting in place this infrastructure and staff will require a significant amount of time and resource.
- 14) Great Britain can learn from the experience neighbouring states who are preparing border

qualified in the UK. However, in 2019 and EU registrations dropped by 35%. This has largely been because of COVID-19 and restrictions on travel. Last ten years of annual registration data below:

Registration Year	UK	EU	ROW	Total
2011	818	472	174	1464
2012		573	150	
2013		664	145	
2014	815	713	143	1671
2015	909	981	203	2093
2016	911	973		2062
2017				
2018				
2019				
2020				

- 26) The UK has taken steps in recent years to expand the number of veterinary undergraduate places. 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. This new capacity is welcome, but it will take 5 years for these new routes to produce new vets.
- 27) 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.
- 28) The University of Surrey announced plans to open the school of veterinary medicine in October 2012; the first cohort of students did not graduate until 2019. The Surrey veterinary school cost £45 million to establish.
- 29) 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.⁸ Despite existing funding mechanisms, the cost of providing undergraduate veterinary education exceeds current direct income streams.⁹ Expanding the numbers of UK graduates must be supported by additional Government funding in order to safeguard existing quality and standards in veterinary education.
- 30) 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. We welcome news that from summer 2021 that international students who have successfully completed an undergraduate veterinary degree in the UK will be eligible for a graduate visa, which will allow them to stay in the UK for up to 2 years to gain work experience. This is a positive step towards supporting the UK veterinary industry and ensuring that the UK remains a leading centre for veterinary education and research.
- 31) Furthermore, there is a clear trend amongst UK graduates who have favoured clinical practice over public health roles. This is evident in the fact that 95% of the veterinary workforce in abattoirs graduated overseas. A significant cultural change and incentivisation would be required to reduce the existing reliance on overseas-qualified veterinary surgeons in this area.

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