

BVA submission to the Department for International Trade consultation on UK trade negotiations: India

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) We welcome the opportunity to provide evidence relating to a potential free trade agreement (FTA) with India.
- 3) Agreeing comprehensive FTAs with India that reduce barriers whilst maintaining standards of animal health, animal welfare and public health offers an opportunity for the export of UK products of animal origin (POAO).

Engagement with the veterinary profession

- 4) UK production meets the highest standards of animal health, animal welfare and food safety thanks to veterinary surgeons who deploy their expertise across domestic food production, from farm to fork, ensuring. They also play a unique role in international trade which is recognised around the world. The involvement of veterinary surgeons protects public health, food safety and animal health and welfare as well as providing assurance to trading partners. Veterinary advice and involvement at all stages of negotiations will serve to facilitate acceptable trade as well as reducing bureaucracy.
- 5) FTAs contain provisions relating to animal health, animal welfare and public health: areas which fall within the expertise of the veterinary profession. Therefore, it has been disappointing that consultation with the veterinary profession on FTAs has been so limited. For example, no meeting was held with the profession prior to the publication of the recent Australian Trade Deal in principle. This is despite the BVA submitting an 8-page consultation response in 2018 highlighting serious concerns about animal welfare in Australian agriculture.
- 6) This poor engagement has highlighted the need for genuine veterinary input into future trade negotiations. As the UK continues to strike new trade deals with partners around the world, which will have consequences for animal health, animal welfare and public health, as well as the ability to export easily to the EU Single Market, we would ask that the Department for International Trade, and Defra which leads on SPS aspects, reflect on how better to engage with our uniquely relevant profession.
- 7) We note the existence of the Agri-food Trade Advisory Group. However, the membership of this group consists of business representative organisations and contains nobody from a veterinary, animal health, food safety or animal welfare science background. Therefore, engagement with this group can in no way be seen as meeting a requirement to have consulted on the wide range of concerns held by the veterinary profession.
- 8) BVA has welcomed the announcement by Government that it will place the Trade and Agriculture

Commission (TAC) on a statutory footing.¹ The Trade and Agricultural Commission (TAC) was established to advise the UK government on how best to advance the interests of British farmers, food producers, and consumers in future trade agreements.

- 9) It is essential that this strengthened body draws upon veterinary expertise to scrutinise future trade deals and put animal health and welfare at the centre of decision making. Veterinary perspectives were included on the original TAC. Former UK CVO Nigel Gibbens sat on the TAC, -group.

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21) The TAC published its report in March 2020. Key amongst their recommendations was recommendation 8 which stated that:⁶

UK producers must meet the high standards of food production expected from UK producers. It should work with trading partners within future FTA negotiations to lower tariffs and quotas to zero where equivalence is possible.

22) The report submits that the UK should adopt a three-pillar approach to liberalising international trade. The most pertinent, for the purposes of an FTA, is pillar two, which establishes how

markets in FTAs would be matched to a core set of standards and technical norms in a number of areas. If trading partners could not demonstrate equivalence with core standards, then they would not be considered for zero tariff, zero quota access for those products to which the core standards applied. These standards and technical norms would:

“Reflect the shared ambitions of the UK and its trading partners;

“Be derived from international standards and norms; and

“Be applied in the UK.

The UK government should negotiate on the basis of this core set of standards, including climate change, environmental, ethical and animal welfare measures. When determining these priority standards, the UK government should take account of domestic production standards and the extent to which they reflect

groups. Defra, as the UK Government department with responsibility for animal welfare, should lead on this process. The involvement of veterinary surgeons will be essential.

Geographical Indications

May	89	17614	19791%
June	170	35156	20680%
Cumulative total	1047	156834	14979%

Last updated: 5 August 2021

- 36) When certificated for Northern Ireland, equines, germplasm and pets, are taken into account this would likely be significantly larger. An additional 40,000 EHCs had been issued between the start of the year and May for Great Britain-Northern Ireland movements of animals and POAO.¹⁵
- 37) Many of the expected veterinary demands have yet to materialise. As a result, we are not confident that the UK has 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 from October 2021, EHCs will also be required for goods moving from Great Britain to Northern Ireland. 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 OV's.
- 38) Previous Defra estimates, based on a survey conducted prior to the end of the transition period, found that the average time an OV spent on certification was approximately 15%. 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 OV's could require between 233 or 700 actual vets.
- 39) There will also be the need for OV's 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 OV's.¹⁶
- 40) Where the required veterinary capacity is not met, 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 pu62 Tc(40))JTJETQ.000008866 0 594.96 842.04 reW*nBh.h866 0 5

