

BVA comments on Agriculture Bill

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 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.
2. We welcome the opportunity to respond to this inquiry into the Agriculture Bill which is currently before Parliament.

Introduction

3. The future of the UK agri-food production is of great interest and importance to the veterinary profession. The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons, working collaboratively with others, protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, and also carry out surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.
4. Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards. By carrying out surveillance and enforcement from farm-to-fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production.
5. Brexit provides the opportunity to develop a strong, competitive and innovative agriculture and food sectors which enjoy the confidence of customers at home and abroad. In the BVA submission to the "Work of Defra: Health and Harmony" inquiry we set out, in detail to the Committee, how to make the best use of this opportunity.¹

The Agriculture Bill

6. The Agriculture Bill itself largely functions as "enabling" legislation. It provides the government with the powers to allocate funds to agriculture and to intervene in the

¹ BVA submission to EFRA Committee Inquiry- Work of Defra: Health and Harmony 2018
https://www.bva.co.uk/uploadedFiles/Content/News,_campaigns_and_policies/Get_involved/Consultation_archive/BVA%20Submission%20EFRA%20Committee%20Inquiry%20Work%20of%20Defra%20Health%20and%20Harmony.pdf



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agriculture and food sectors. The Secretary of State is granted considerable discretion to regulate, determine interventions, direct funding.

7. Defra has released a policy statement alongside the bill, “Health and Harmony: the future for food, farming and the environment in a Green Brexit”² which explains the intended policy the legislation will be used to enable. This statement goes some way to provide details that the legal text does not, however there is still a need for greater clarity as to how the powers provided for in the new bill will be implemented.

New Financial Assistance Powers

8. The legislation would enable a recalibration of the system of agricultural support in England, with a phased withdrawal of direct payments to farmers. The central principle of the new policy, which forms Part 1 of the bill, is that public money should support public goods that benefit producers, consumers and wider society.
9. BVA has supported this approach of public money for public goods and welcome this enshrining in legislation. We also welcome the specific inclusion of “protecting or improving the health or welfare of livestock” amongst the public goods which could receive financial support. It is welcoming to note consultation responses to the Health and Harmony consultation “showed that high standards of welfare are a priority for the public and the sector.”³
10. The adjoining policy statement gives an overview of the ways in which the “public goods” could be supported during the agricultural transition period and beyond. Within the animal health and welfare chapter we welcome the comprehensive approach where multiple policy levers open to government (regulation, funding, consumer information, data utilisation) are considered together.
11. We welcome the financial assistance available to improve agricultural productivity. The veterinary profession plays a pivotal role in increasing productivity while ensuring the animals’ health and welfare needs are met. We support the definition of productivity used within the legislation which emphasises quality and efficiency in production.

Interconnected outcomes

12. We would note the interconnected nature of the public goods and productivity as outcomes. We would caution against an approach which creates silos between the different schemes which would fail to achieve evident synergies. Crucially the

² Defra, Health and Harmony: the future for food, farming and the environment in a Green Brexit - policy statement, 14 September 2018 <https://www.gov.uk/government/publications/the-future-for-food-farming-and-the-environment-policy-statement-2018/health-and-harmony-the-future-for-food-farming-and-the-environment-in-a-green-brex-it-policy-statement>

³ Ibid



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design of animal health interventions should incorporate animal welfare and vice-versa, as the two are intrinsically linked.

13. The policy statement considers environmental public goods and animal health and welfare public goods separately. However, the two can be mutually beneficial:
 - Incentivising innovative whole farm management systems could integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products.
 - Reduced antimicrobial use in livestock can lead to fewer antimicrobials being excreted and thus reaching the environment. This would reduce potential for Antimicrobial Resistance (AMR) transmission from livestock into ecosystems
 - To mitigate against climate change, advances in animal production and farming practices are necessary to increase efficiency while maintaining animal welfare.
14. Similarly, schemes designed to assist productivity should incorporate animal health and welfare. Improved animal health outcomes benefits productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading a more financially resilient sector. This was most clearly illustrated by the Foot and Mouth outbreak in 2001. This was estimated to have cost £5 billion to the private sector and £3billion to the public sector, damaged the lives of farmers and rural communities, harmed the reputation of UK agriculture and caused a general election to be postponed.⁴
15. Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs, has stated that “high animal welfare standards and high environmental standards reinforce the marketability of our produce.”⁵ Therefore, agricultural policy should support animal health and welfare which underpins the reputation of UK agricultural produce. This reputation allows UK produce to add value to produce through the by marketing to discerning, value-added markets.

Veterinary Involvement

16. Veterinary surgeons work closely with farmers and animal keepers to ensure biosecurity measures are formulated, implemented and health and disease threats are monitored and acted upon. Both private veterinary surgeons and Government employed veterinary surgeons, are uniquely positioned to make every on-farm contact count by providing a holistic approach to overall herd health and welfare, its wider determinants and, in turn, disease surveillance and prevention.

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

⁵ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

17. Thus, the involvement of the veterinary profession within any new agricultural policy will be integral to achieving animal health, animal welfare, environmental and productivity gains. This ambitious agriculture policy will not achieve its aims if the veterinary profession does not have the capacity to play the role it is uniquely able to.
18. There have been concerns about the capacity of the veterinary workforce, which have existed for some time, but have been brought into sharp focus by the exit of the UK from the EU. The Major Employers Group (MEG) which represents large veterinary practices carried out a review in July 2017 which found a workforce shortage of around 11%. The demand for veterinary surgeons is likely to increase following exit from the EU. Nigel Gibbens, the then Chief Veterinary Officer 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.⁶
19. The UK veterinary workforce is highly reliant on EU graduates. Statistics from the RCVS reveal the dependence of the UK on non-UK EU vets. The RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of all new registrants in that year from non-UK EU vet schools was 47%⁷
20. It will be vital that an appropriate number of veterinary surgeons can be recruited from overseas, whether from EU or from outside the EU, to ensure that essential veterinary work continues, and the opportunities of a new agricultural policy can be seized.
21. To alleviate labour constraints BVA has made the following calls upon Government:
- Overseas nationals graduating from UK vet schools should be allowed to live and work in the UK.
 - Vets should immediately be restored to the Shortage Occupation List.
 - The veterinary profession should be prioritised within future immigration policy. The Government should consider the economic and social impact the profession has, beyond its relatively small size.

Collection and sharing of data

22. The Agriculture Bill allows the Secretary of State to “require a person in, or closely connected with, an agri-food supply chain to provide information about matters connected with any of the person’s activities connected with the supply chain so far as the activities are in England.”

⁶ Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vetsessential-after-brexitsays-cvo/>

⁷ Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017



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23. This data can be required for specific purposes set out under section 14 (4). We welcome the inclusion of “promoting the health or traceability of creatures of a kind kept for the production of food, drink, fibres or leathers;” on this list. However, the ability to collect data for the promotion of animal welfare is omitted. As animal welfare is an outcome which will be financed under this legislation, data that can be utilised to promote that aim should be available for collection.
24. BVA would therefore propose the following amendment, which would ideally be inserted onto the line directly below 14(4)(c) which refers to animal health and traceability.

Clause 14

Page 10, line 8, subsection (4)

Insert

“promoting the welfare of creatures of a kind kept for the production of food, drink, fibres or leathers”

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