

## BVA policy position on an EU-UK veterinary agreement

### Introduction

Following Brexit, the United Kingdom (UK) has been able to set its own standards for food safety and plant and animal health in Great Britain (GB), independent from the European Union (EU). The absence of an EU-UK veterinary agreement means that all goods of animal origin (such as meat, fish, dairy, and live animals) are subject to Sanitary and Phytosanitary (SPS) checks when they cross borders. These checks, while essential for maintaining biosecurity, have led to disruptions in trade, with a report by the Centre of Inclusive Trade Policy (CITP) concluding that the export of UK food and agricultural products to the EU has fallen by more than 16%, equating to £2.8bn fewer exports a year<sup>1</sup>.

Agri-food exports overall are worth £25 billion to the UK economy, and Aston University concluded that “the two years since the new trading rules were put in place have seen a fall of 5% in exports to the EU from 2019 levels, during a period where the sector has otherwise grown”. They concluded that a veterinary deal with the EU would benefit the sector, which could see an increase in exports from the UK to the EU by at least 22.5%<sup>2</sup>.

Ahead of the general election in July 2024, the Labour Party made a manifesto commitment to improve the UK’s trading relationship with the EU, outlining three specific areas of focus, including a ‘veterinary agreement’. Following the election, some trade ministers, including Douglas Alexander, have expressed their commitment to negotiating a veterinary agreement with the EU but with no indication of the likely date of commencement of such negotiations. In January 2024, the EU’s ambassador to the UK, Pedro Serrano, said that the EU is ‘favourable’ to the possibility of an agreement on sanitary and phytosanitary measures in the future but again with no indication of the likely timeline for completion.

BVA has consistently advocated for measures that support the veterinary workforce while safeguarding animal health and welfare. In 2022, we published the BVA position on the facilitation of trade in live animals and animal products between GB and the EU Single Market.<sup>3</sup> This position clearly supports the effective and efficient use of veterinary capacity whilst safeguarding animal health and welfare, upholding public health standards, and recognising the importance of the veterinary input into and signature on SPS-related trade documentation.

There is also a discrepancy within countries in the UK as Northern Ireland (NI) must continue to follow the EU’s legislation on goods, agricultural production and marketing, as well as SPS measures due to the Windsor Framework. Businesses that move agricultural and agri-food goods from GB to the EU and, to a lesser extent, from GB to NI must now demonstrate full compliance with relevant EU rules.

NI also faces the issue of access to veterinary medicinal products - as this wasn’t part of the Windsor Framework (which did set out a long-term solution for the supply of human medicines into NI, ensuring that human medicines can be approved and licensed on a UK-wide basis by the Medicines and Healthcare products Regulatory Agency (MHRA)).

We believe that a veterinary agreement with the EU provides the UK with an opportunity to ensure efficient use of the veterinary workforce while ensuring high standards of animal health and welfare; and public health. A veterinary agreement could also ease the movement of goods between NI and GB and could also provide a permanent solution to the issue of access to veterinary medicines in NI.

---

<sup>1</sup>Simpson, J. (2024, December 3). *British food exports to EU “have fallen £3bn a year since Brexit.”* The Guardian. <https://www.theguardian.com/business/2024/dec/03/british-food-exports-to-eu-brex-it-citp-trade>.

<sup>2</sup>Du, J., Shepotylo, O., Liu, X., & Shi, Y. (2024, September). *Unbound: UK Trade post-Brexit*. Aston Business School. <https://www.aston.ac.uk/Sites/Default/Files/2024-09/Full%20Report.pdf>.

<sup>3</sup>BVA position on the facilitation of trade in live animals and animal products between Great Britain and the EU Single Market. (2021). <https://www.bva.co.uk/media/4611/bva-position-on-the-facilitation-of-trade-in-live-animals-and-animal-products-between-great-britain-and-the-eu-single-market.pdf>

## What is a veterinary agreement?

A Veterinary Agreement – also known as an SPS agreement – is an agreement between sovereign nations that either ensures the alignment and harmonisation of the rules, regulations and standards relating to animal and plant health and public health; or formally recognises each country’s official controls on animal, plant and public health as being “equivalent” in effect and outcome. Such agreements have the potential to reduce or remove technical barriers to trade, and much of the bureaucratic overhead between the parties. A veterinary agreement includes trade in live animals, products of animal origin, such as food, and often includes veterinary medicinal products.

Third countries such as the UK that do not have a veterinary agreement with the EU can encounter significant difficulties when attempting to export their products into the EU. Such trade can only take place through Border Control Posts (BCPs) where strict documentation, identity and physical checks are applied to protect the EU’s animal and public health status. By their nature, BCP checks must be rigorous, and inspecting staff must be completely satisfied that everything is in order and fully compliant with the EU’s requirements before admitting consignments that can then freely travel within the EU. Something as simple as a minor spelling mistake or the stamp being applied in the wrong place can and do lead to the consignment being delayed or rejected altogether.

## Types of veterinary agreements

There are several examples of Veterinary Agreements that the EU has reached with different countries, from Andorra to Chile to the United States of America, although these vary in scope and depth. The EU also has more extensive veterinary agreements with New Zealand and Switzerland. These are considered to be the models under which there would be most benefit to the UK establishing with the EU because they both removed the vast majority of physical checks but do so in different ways. Switzerland is the only ‘third country’ included in the EU Common Veterinary Area (CVA)<sup>4</sup>; while New Zealand’s agreement is based on equivalence of SPS measures but still reduces almost all physical checks<sup>5</sup>.

## New Zealand-style agreement

The EU-New Zealand Free Trade Agreement (FTA) entered into force on 1 May 2024 and it simplifies trade in live animals and animal products.

The agreement is based on ‘a mechanism for the recognition of *equivalence* of sanitary measures’. This means the EU and New Zealand (NZ) do not apply the same SPS rules as each other but have agreed a list of products where they recognise that each other’s standards provide an equivalent level of SPS assurance to the importing party.

It eliminates most physical checks, with these taking place on 1-10% of most meat and dairy products. Duties were removed on 91% of New Zealand’s goods exports to the EU. This percentage will rise to 97% after 7 years<sup>6</sup>. However, not all products are covered, for example, NZ continues to be banned from exporting products like minced meat into the EU.

The agreement does not remove the need for documentary, physical and identity checks on live animals at the EU’s border, as 100% of live animals being imported from NZ remain subject to EU checks<sup>7</sup>. It also does not remove the need for paperwork (particularly veterinary certificates), albeit this is simplified for

---

<sup>4</sup> *The case for a Common Veterinary Area under the UK-EU Trade & Co-operation Agreement (2024)*. TAWC. <https://tawcuk.org/wp-content/uploads/2024/02/EU-UK-Common-Veterinary-Area.pdf>

<sup>5</sup> Wachowiak, J. (2024, October 3). *Veterinary agreements*. UK in a Changing Europe. <https://ukandeu.ac.uk/explainers/veterinary-agreements/>

<sup>6</sup> Groeneveld, R. (2024, May 24). *EU-New Zealand FTA: More possibilities for dairy but restrictions remain*. Dairy Global. <https://www.dairyglobal.net/industry-and-markets/market-trends/eu-new-zealand-fta-more-possibilities-but-restrictions-remain/>

<sup>7</sup> Wachowiak, J. (2024, October 3). *Veterinary agreements*. UK in a Changing Europe. <https://ukandeu.ac.uk/explainers/veterinary-agreements/>

most goods.

In practice, New Zealand's remoteness limits the number of consignments of live animals and products. It supplies 1% of EU imports in this sector (of which 33% are sheep and goat meat)<sup>8</sup>.

### Switzerland style agreement

The EU-Swiss veterinary agreement removes technical barriers to trade in a wide range of agricultural products ranging from plants and plant products to animal feed, seeds, live animals and animal products.

For the latter, it creates a de facto CVA based on the two parties having 'very similar legislation, leading to identical results'<sup>9</sup>. In practice, this means Switzerland must modify its legislation relating to animal, plant and veterinary public health in response to and in parallel with any changes made in the EU.

The creation of the CVA between the EU and Switzerland is based on the principle of mutual recognition of animal health legislation, policy, and operational implementation around animal and public health in each jurisdiction. This means that Switzerland has adopted and must continue to adopt and implement animal health and public health standards that are equivalent in content and effect to those of the EU.

In return, within the CVA, the agreement removes the need for any documentary, identity, and physical checks at the border, as well as most paperwork – this is because as a result of the legislative alignment, Switzerland is to all practical intents and purposes part of the EU Single Market for animals and animal products.

As another consequence of this, Switzerland also applies the same rules to its imports from non-EU (so-called "Third") countries as the EU does. As a result, shipments from outside the EU and Switzerland can also move freely throughout the CVA (ie both Switzerland and the EU's 27 Member States) once they have been inspected in Switzerland's two external BCPs at Geneva or Zurich airports or at any EU border control.

The legislative alignment in the EU's Swiss agreement serves to remove the need for veterinary-certified documentation, Export Health Certificates (EHCs), which otherwise are necessary for any movement of animals as well as animal products, including blood samples used in research and laboratory work, or for physical and documentary checks on product moving either way at the Swiss - EU border.

It must be noted that the EU is said to be uneasy with some aspects of the Swiss veterinary agreement. Specifically, the EU-Swiss bilateral agreement is essentially "static", and there is no in-built mechanism to automatically reflect new or updated EU legislation in Switzerland's legislation (or make it directly applicable as happens within the EU via Commission Regulations). This means that Switzerland must amend its legislation every time the EU does which has led to concerns on the EU side that there may be periods when the Swiss industry is not subjected to the same controls as the EU's. There is therefore the risk that the Swiss veterinary agreement as a concept is slowly phasing out, as should sustained legislative divergence arise, it would no longer secure frictionless market access as a result of the non-incorporation of new developments in the EU acquis' in the Swiss legislative base.

This leads to the possibility a similar arrangement with the UK would either be strongly resisted by the EU; or come with additional requirements, for example, direct applicability across the whole of the UK of all the EU SPS legislative requirements and proposals.

### Summary differences between EU-Switzerland CVA and EU-New Zealand veterinary agreement<sup>10</sup>

---

<sup>8</sup> ibid

<sup>9</sup> ibid

	EU-Switzerland	EU-New Zealand	Animal welfare benefits	Workforce benefits
Mutual recognition animal health standards	✓	Some health standards only	✓	✓
Does not require veterinary certificates	✓	X	✓	✓
Information sharing	✓	✓	✓	✓
No checks	✓	X	X risk for enforcement; but no border waiting times for live animals	✓
Compliance with other FTAs	✓	✓	✓	-
Allows raising animal welfare standards unilaterally for each country	✓	✓	✓	-
Covers all species	✓	X	✓	✓

11

### Potential challenges of the Swiss style agreement

A potential “political” barrier to the development of a CVA is that this could be perceived as the UK livestock and processing industry effectively rejoining the EU or its Single Market, particularly if the negotiations with the EU rely on “dynamic alignment” excessively and the direct applicability of any changes in its SPS or public health legislation.

There could also be issues where the UK or parts of the UK would wish to pursue higher standards of health or welfare, or at a faster pace, than the EU. However, BVA believes that this could be dealt with by ensuring the UK obtains from the EU the right to derogate and apply higher standards of animal welfare (as distinct from lower), in areas such as food labelling. There is precedent for this area as within the EU

---

<sup>11</sup> *The Way Forward: A Common Veterinary Agreement with the EU and UK*. (2025). TAWC. <https://tawcuk.org/wp-content/uploads/2025/01/The-Way-Forward-EU-UK-Commons-Veterinary-Area-proposals.pdf> BVA added then the column about workforce benefits.

internal market, the Netherlands and Germany have been permitted by the EU to apply different and potentially higher labelling requirements, including origin, welfare and method of production labelling<sup>12</sup>.

Another potential issue for an EU – UK Veterinary Agreement is the number of potential entry points into the UK from Third Countries. Switzerland has only two non-EU ports of entry into Switzerland; Geneva & Zurich airports. The UK has multiple ports of entry across its land and sea borders with the EU as well as 10 BCPs with non-EU countries at airports and 12 at seaports.

The potential for importing disease which could negatively impact the UK's animal and public health as well as the UK's economy, is another significant consideration. Any disease entering the UK could also have a negative impact on the EU. BVA believes that by allowing the current BCPs to focus on animal health and internal paperwork so that we do not allow disease to enter and spread, this will be mitigated and indeed, in terms of surveillance, potentially improved by the more targeted use of the existing staff resources.

**Recommendation 1: The UK government should strive to develop an agreement based on the principle of dynamic alignment. It could use the Swiss-style agreement which is based on the principles of full and ongoing legislative alignment as to permit barrier removal; while also providing a mechanism to allow flexibility for areas where the UK may wish to set higher standards than European counterparts of animal health and welfare.**

## SPS Measures

SPS measures are measures to protect humans, animals, and plants from diseases, pests, or contaminants. We consider that SPS measures form a vital part of the UK's protective biosecurity and assurance framework and must not be seen solely as a barrier to trade that needs to be overcome.

After Brexit, BVA gave feedback to the Cabinet Office on the Border Target Operating Model (BTOM) draft, calling on the UK government to maximise the opportunity to develop an improved regime of SPS controls which are essential to maintain animal and public health as well as biosecurity<sup>13</sup>.

When considering a veterinary agreement with the EU that aims to align SPS measures to reduce barriers to trade and improve animal welfare, the UK must consider how practical it would be to comply with EU regulations. Currently, EU Animal Health Regulations require all farms producing animals or products of animal origin for trade within or export to the EU to have regular veterinary visits. From December 2023 all EU producers sending animals to market or to slaughter within the EU have been required to demonstrate that a veterinary visit has taken place in the past 12 months. This requirement should be relatively easy for most UK farmers to comply with in the medium-term given the move towards Animal Health and Welfare Pathways throughout most of the four UK Nations; for example the current English Health and Welfare Pathway "offers farmers funding for an annual visit from a veterinary professional of their choice to consider the health and welfare of their animals"<sup>14</sup>. BVA believes that annual veterinary visits have clear potential health and welfare benefits; with the prospects of access to EU markets now offering an added incentive. However, the introduction of dynamic alignment would make this mandatory for all live-stock keepers, including those selling to, or supplying processors servicing internal UK markets only.

Being required to implement some other EU standards in the UK could be problematic in other respects. For example, the EU has recently decreased the permitted maximum level of lead in ruminant animal products from 500 ppm to 200 ppm. Applying this lower-level UK-wide would present a particular challenge, given the geochemistry of the main livestock grazing areas. The UK government would therefore have to introduce the lower level (200) into the entire UK domestic market or negotiate with the EU the possibility

---

<sup>12</sup> *Food labelling - EU-wide uniform food labelling*. (n.d.). Federal Ministry of Food and Agriculture.

<https://www.bmel.de/EN/topics/food-and-nutrition/food-labelling/EU-wide-food-labelling-lmiv-fic.html> .

<sup>13</sup> *BVA feedback to the Cabinet Office Border Target Operating Model draft* (2023). BVA  
<https://www.bva.co.uk/media/5099/bva-feedback-to-the-cabinet-office-btom.pdf>

<sup>14</sup> *Animal Health and Welfare Pathway*. (2025, January 21). GOV.UK.

<https://www.gov.uk/government/publications/animal-health-and-welfare-pathway/animal-health-and-welfare-pathway>

**BVA policy position on an EU-UK veterinary agreement January 2025**

of operating to two different standards, one for domestic and one for export consumption. This is an example of an area where the right to apply divergence and flexibility and deviate from European legislation may be needed.

## Animal health and welfare

BVA supports the need for a regime of robust import controls as the key line of defence to help protect against diseases not currently present in the UK, such as African Swine Fever (ASF), a fatal and highly infectious viral disease that can be transmitted between pigs. We support the risk-based and targeted approach to border controls and welcome the proposed categorisation derived from a scientific assessment of the biosecurity and food safety risk that each commodity poses, whilst also taking into account the risk associated with the region or country of origin.

However, while robust import controls are certainly one of the key lines of defence to protect against disease, physical checks currently being carried out at Border Control Points (BCPs) are causing innumerable delays, raising concerns for animal health and welfare. BCPs are not always located on the most direct route between the point of departure and destination – meaning that livestock are potentially subjected to longer journeys and the risk of adverse welfare impacts than necessary were “point to point” transport permitted. Trade via BCPs can also be affected by communication issues. For example, misunderstanding the details of the EU’s SPS requirements, inaccurate translation or form completion can lead to delays and the complete rejection and return of the consignment.

The primary focus for animal disease prevention should be disease surveillance, data sharing and intelligence-led interventions rather than physical checks as these are better ways of controlling disease outbreaks and protecting the UK’s biosecurity. If the UK agreed a Swiss-style veterinary agreement with the EU, the UK could also gain access to the Animal Disease Information System (ADIS), which tracks and reports notifiable diseases across the EU; the Rapid Alert System for Food and Feed (RASFF), and the Trade Control and Expert System (TRACES). The RASFF was established to ensure the exchange of information between member countries to support swift reaction by food safety authorities in case of risks to public health resulting from the food chain<sup>15</sup>. TRACES is the European Commission’s platform for animal and plant health certification required for the importation of animals, animal products, food and feed of non-animal origin and plants into the European Union, and the intra-EU trade and EU exports of animals and certain animal products<sup>16</sup>. Access to TRACES would allow APHA to verify an animal’s true origin, the journey history or health status.

A veterinary agreement based on the alignment of the Swiss style could also allow the UK to drive up standards of animal health and welfare in areas where the EU has higher standards than the UK. This agreement will still allow the UK to maintain those standards of animal health and welfare that are higher than those in the EU, such as food labelling. Switzerland has a ban on beak trimming for laying hens since 1992<sup>17</sup> while some member states in the EU still allow it<sup>18</sup>.

## Equine movement

In terms of risks to animal welfare associated with physical checks and transit via BCPs, one area that could particularly potentially benefit from a Swiss-style veterinary agreement is equine movement. Prior to Brexit, the Tripartite Agreement (TPA) enabled the movement of horses with high health status between

---

<sup>15</sup> *Rapid Alert System for Food and Feed (RASFF)*. (2023). European Commission. [https://food.ec.europa.eu/food-safety/rasff\\_en](https://food.ec.europa.eu/food-safety/rasff_en)

<sup>16</sup> *TRACES at a glance*. (n.d). European Commission [https://food.ec.europa.eu/horizontal-topics/traces\\_en](https://food.ec.europa.eu/horizontal-topics/traces_en)

<sup>17</sup> *Opinion on Beak Trimming of Laying Hens*. (2007). FAWC.

[https://assets.publishing.service.gov.uk/media/5a7cfb3eed915d28e9f3954e/FAWC\\_opinion\\_on\\_beak\\_trimming\\_of\\_laying\\_hens.pdf](https://assets.publishing.service.gov.uk/media/5a7cfb3eed915d28e9f3954e/FAWC_opinion_on_beak_trimming_of_laying_hens.pdf)

<sup>18</sup> *Overview report Protection of the welfare of laying hens at all stages of production*, (2023). European Commission ; Health and Food Safety Directorate..

Ireland, the UK and France (the three main hubs of the European continent's horse racing industry). Following the UK's departure from the EU, the movement of all horses into the EU is regulated by the EU's SPS with owners and companies having to submit checks such as: pre notifying the border authority, pre-export isolation and residency requirements, alongside an export health certificate (EHC); and having to move through a BCP set up to inspect equines. This is causing delays and concerns for animal health and welfare as there can be long delays on the inspections and movement through BCPs as well as issues with the paperwork not being filled accurately.

The physical check of live animals with high health status such as equine athletes and the potential welfare implications if animals are subsequently detained or turned back at these entry points is a concern for animal welfare. The UK's Trade & Animal Welfare Coalition (TAWC) has acknowledged this stating that "inspections at ports of entry into the EU and at Great Britain ... impose a risk to animal welfare by prolonging transport stress and exposure to confined conditions through waiting time at the BCP. Additionally, if the movement of animals were deemed to be non-compliant (e.g. incorrect accompanying paperwork), animals could either be re-dispatched to their country of origin, placed into quarantine, or destroyed entirely".

As per the section on animal health and welfare, another concerning issue regarding equine movement is the lack of access to TRACES, despite the UK landbridge – a transportation route that connects Ireland to the EU by using the UK's road and port infrastructure- being used to transport equines. Access to TRACES would allow APHA to verify the horse's origin, health status and movement history, preventing fraudulent movement of equines that may be destined for slaughter, causing significant biosecurity, welfare and food safety concerns.

### Veterinary certification

Following Brexit, the introduction of health certifications and physical checks are causing concerns to the veterinary profession in three main areas: animal health and welfare; unnecessary bureaucracy and associated paperwork, such as the need for Export Health Certificates (EHCs); and veterinary man-power implications and poor use of professional resource.

About 1 million EHCs have been issued putting significant pressure on the profession, since Brexit controls came into force in January 2021<sup>19</sup>. With a cumulative total of just 1,761 EU EHCs issued in 2020, rising to almost 214,000 in 2021, this represents a 12,152 per cent change. At the time, and assuming the rest of the year remained in line with these figures, it was estimated that an additional 245 years of certifier time would be required compared to 2020<sup>20</sup>. This trend has continued and in 2024, 328,727 were issued by the Animal and Plant Health Authority (APHA)<sup>21</sup> with reports estimating that the UK food industry has spent over £200m on EHCs since the UK left the single market in January 2021<sup>22</sup>.

A veterinary agreement based on the alignment of the Swiss model will remove the need for EHCs as well as the need to pass through BCPs with their associated checks, but not for commercial documentation. Commercial documentation is an internal movement document that was already used prior to Brexit. It is a much simpler and less time-consuming document to fill, often one page, requiring no veterinarian certification. A return to these arrangements would significantly reduce the current pressure on the veterinary workforce by significantly reducing the volume of work related to EHCs required of Official Veterinarians.

---

<sup>19</sup> Gonçalves, M. (2024, July 31). *Brexit export health certificate costs mount to £200m*. The Grocer. <https://www.thegrocer.co.uk/news/uk-food-exporters-have-spent-over-200m-on-vet-paperwork-since-brexit/693897.article>

<sup>20</sup> *Vet shortages, workloads and what we can do about them at the OV Conference 2021*. (2021, October 29). Veterinary Practice. <https://www.veterinary-practice.com/article/vet-shortages-workloads-ov-conference-2021>

<sup>21</sup> *Export Health Certificates 2024* (2025, January 21). GOV.UK; APHA. <https://s3.eu-west-1.amazonaws.com/data.defra.gov.uk/Agriculture/Export+Health+Certificates+December+2024.pdf>

<sup>22</sup> Gonçalves, M. (2024, July 31). *Brexit export health certificate costs mount to £200m*. The Grocer. <https://www.thegrocer.co.uk/news/uk-food-exporters-have-spent-over-200m-on-vet-paperwork-since-brexit/693897.article>

It must also be recognised that the profession has begun to adapt to the changed requirements, and some veterinary businesses have been established or expanded to meet this need, so some Official Veterinarians' (OVs) livelihoods now depend to some degree on responding to the existing veterinary certification requirements. So while it remains the view of the BVA that this is not the best use of veterinary resources, some consideration must be given to the timing and manner of the phasing in of any changes that would result from a reduction in the need for veterinary certification under the anticipated new arrangements

**Recommendation 2: The veterinary agreement should include provisions to remove the need for EHCs, while ensuring it retains the power to develop robust checks at BCPs for animal welfare and health, in parallel, allowing the veterinary profession to focus resources on animal health and disease surveillance.**

**Recommendation 3: The UK government should implement surveillance at points of entry to check for personal imports of food products of animal origin and to undertake a public information campaign. There are current restrictions in place<sup>23</sup>, however, surveillance could be improved.**

**Recommendation 4: Any EU-UK veterinary agreement must include the provision for the UK to diverge around specific animal health and welfare; such as food labelling requirements.**

**Recommendation: An EU-UK veterinary agreement must also include the provision for the UK to diverge on biosecurity-related legislation in order to safeguard the UK from disease incursion from the EU.**

**Recommendation 5: The UK Government should work with specific sectors, such as the pig sector to ensure any new veterinary agreement addresses present concerns around notifiable diseases being imported from Europe, specifically African Swine fever.**

**Recommendation 6: The UK Government must ensure that there is a focus on disease prevention based on data sharing and disease surveillance ensuring that the UK has access to RASFF, ADIS as well as TRACES under any agreement.**

## **Veterinary Medicinal Products (VMPs)**

Veterinary agreements can also include access to VMPs if the countries do not already have a Mutual Recognition Agreement (MRA) that includes these products. VMPs may be used for clinical purposes, such as to treat production or companion animals but also for the laboratory sector who treat non-standard species as well as use medicines for experimental and research purposes.

This will be particularly important to protect from disease incursion. A good example of this is a disease such as Foot and Mouth Disease (FMD), a transboundary animal disease (TAD) that deeply affects the production of livestock and disrupts regional and international trade in animals and animal products. Vaccine security is a particular problem for FMD due to the epizootic nature of the disease, the variable nature of FMD virus and the difficulty in creating or sustaining an economic market for the vaccine<sup>24</sup> so reaching an agreement that facilitates the movement of VMPs would be key to controlling disease outbreaks in the UK and in the EU.

### **Access to veterinary medicinal products in Northern Ireland**

---

<sup>23</sup> *Bringing food into Great Britain*. (n.d.). GOV.UK. <https://www.gov.uk/bringing-food-into-great-britain/meat-dairy-fish-animal-products>

<sup>24</sup> *Prequalification Veterinary Vaccines* (2023). Food and Agriculture Organization of the United Nations; The European Commission for the Control of Foot-and-Mouth Disease (EuFMD) . <https://www.fao.org/eufmd/global-situation/vaccine-prequalification/es/>



Following Brexit, the Northern Ireland Protocol was agreed to avoid a so-called “hard border” between NI and the Republic of Ireland (ROI). This required NI to align with the EU in certain areas like customs, goods regulation, VAT, state aid and rules on agri-food, allowing it to maintain frictionless access to the EU market and prevent checks having to be applied on goods moving between NI and the ROI.

Veterinary medicines in NI are regulated by the UK’s Veterinary Medicines Regulations 2013<sup>25</sup>, which is legislation that is overseen by the Veterinary Medicines Directorate, an executive agency of Defra for the whole of the UK. However, Veterinary Medicines Regulations (VMRs) 2024 do not apply in NI<sup>26</sup>. Instead, due to the provisions in the Northern Ireland Protocol and the Windsor Framework, products marketed in NI are now required to comply fully with the European Veterinary Medicines Products Regulation, which is overseen and regulated by the European Medicines Agency (EMA). The 2013 VMRs, in addition to EU laws on veterinary medicines and medicated feed still apply in NI.

Two elements in the EU Veterinary Medicinal Products Regulation will be particularly difficult for GB-based companies to comply with in order to market products in NI: batch release testing and Marketing Authorisation Holder (MAH) registered address. The European regulation requires batch testing to take place within the EU and for the MAH registered address – the address in the datasheet inside the medicine pack- to be also within the EU. Currently, the majority of veterinary medicines are transported from mainland Europe into GB, where they are warehoused and where the MAH is often located, and then into the ROI and NI. This supply route and process will not be permitted by the EU after December 2025, since any product entering NI from GB will be considered an import into the EU and batch release testing will have to have been carried out within the territory of the EU.

It is unclear what percentage of NI veterinary medicinal products could be at risk. Earlier estimates indicated that up to 50% of products could be at risk<sup>27</sup>. The figure was then thought to be closer to 30%, and recent insights give a figure closer to 10%. However, it is not only the percentage of products that may be lost but the type and nature of these products, the volumes used and the health and welfare impact that this may have on both animal and human health.

On 19 December 2022, the European Commission agreed to a three-year delay of the implementation of their proposed controls on the supply of veterinary medicinal products into NI until 31 December 2025, thanks to lobbying efforts, including those from BVA and its NI Branch. Once this so-called “grace period” expires, however, there are significant concerns about the availability of veterinary medicinal products in NI.

Trade in livestock and livestock products between NI and ROI would also be put at risk, as these discontinuations will be across all species and all therapeutic drug classes. A third of NI’s annual 2.5 billion litres of raw milk is shipped to the ROI for processing, but Stormont’s Department of Agriculture, Environment and Rural Affairs (DAERA) must certify that it meets EU standards, which it will not be able to do unless a medicines deal is agreed<sup>28</sup>.

A veterinary agreement between the EU and the UK could resolve this issue. However, this agreement could take much longer than 12 months to negotiate so we have developed a policy position with longer-term, medium-term and mitigations. The position is [available here](#).

---

<sup>25</sup> *Veterinary medicines legislation*. (2014, April 14). GOV.UK; Veterinary Medicines Directorate. <https://www.gov.uk/guidance/veterinary-medicines-regulations>

<sup>26</sup> *RCVS publishes guide to help professions navigate the 2024 Veterinary Medicines Regulations*. (2024, October 2). RCVS. <https://www.rcvs.org.uk/news-and-views/news/rcvs-publishes-guide-to-help-professions-navigate-the-2024/>.

<sup>27</sup> *The Northern Ireland Protocol (NIP)* (2024, March 19). NOAH (National Office of Animal Health). <https://www.noah.co.uk/topics/business-and-trade/northern-ireland-protocol/>

<sup>28</sup> *ibid*

**Recommendation 7: When developing a veterinary agreement, the UK Government should consider including veterinary medicinal products for all purposes. Veterinary medicinal products are often used for clinical purposes, such as to treat production or companion animals but also for the laboratory sector who treat non-standard species as well as use medicines for experimental and research purposes, rather than clinical veterinary use.**

**Recommendation 8: A veterinary agreement generally and a Swiss-style agreement, in particular, must allow for continuous access to the full range of UK-licensed veterinary medicinal products for Northern Ireland.**

## Pet travel

A Swiss-style veterinary agreement will include the movement of livestock (farm and equine) and it could also include household pets (dogs and cats), as currently Switzerland and the EU allow pets to travel using a pet passport – as long as they are microchipped and vaccinated- without the need for an animal health certificate<sup>29</sup>.

Given the volume of travel between the UK and the EU, many holidaymakers would benefit from having reductions in the cost and bureaucracy of getting an animal health certificate which is currently required if people are travelling with their pets to an EU country or NI as pet passports issued in GB are no longer valid to enter the EU<sup>30</sup>. Animal health certificates are often time-consuming and complex yet required within a short time frame as pet owners may have a deadline for travel, so some veterinary practices choose not to make them available to customers.

From 2025, as part of the Windsor Framework, pets require a pet passport to travel from GB to NI<sup>31</sup> which is technically part of the EU single market so the EU and the UK could replicate this in an EU-UK veterinary agreement across both areas. This document is free of charge and lasts for a lifetime so it would considerably reduce the time veterinary practices currently spend on issuing animal health certificates and the cost for pet owners. In our pet travel position, we already recommended that the UK Government should negotiate for the UK to become a non-EU country from which pet passports are recognised with the Pet Travel Scheme<sup>32</sup>.

**Recommendation 9: The UK government should consider including pet passports to be used for travel between the UK and the EU as part of the veterinary agreement as this provides the necessary assurance for animal health and traceability while reducing the administrative burden on veterinary surgeons.**

## Mutual Recognition of Professional Qualifications (MRPQs)

The UK is highly reliant on veterinarians trained in EU institutions, particularly in certain sectors of veterinary work such as public health. In our report “Brexit and the Veterinary Profession” published in 2017, we stated that in the meat hygiene sector alone, some estimates suggest 95% of Official Veterinarian (OVs) working in abattoirs graduated overseas with the vast majority of these being non-UK EU graduates. Approximately

---

<sup>29</sup> *Dogs, cats and ferrets*. (2024). Confederation Suisse; Federal Food Safety and Veterinary Office. <https://www.blv.admin.ch/blv/en/home/tiere/reisen-mit-heimtieren/hunde-katzen-und-frettchen.html>

<sup>30</sup> *Taking your pet dog, cat or ferret abroad*. (2020, August 10). GOV.UK. <https://www.gov.uk/taking-your-pet-abroad/pet-passport>

<sup>31</sup> *Northern Ireland pet travel scheme: how the scheme will work*. (2024, November 6). GOV.UK; APHA. <https://www.gov.uk/government/publications/northern-ireland-pet-travel-scheme/northern-ireland-pet-travel-scheme-how-the-scheme-will-work>

<sup>32</sup> *BVA policy position on pet travel*. (2021.). BVA. <https://www.bva.co.uk/media/4043/bva-policy-position-on-pet-travel-full.pdf>

45% of Government Veterinary Services posts are fulfilled by non-UK EU vets and many non-UK EU vets also work in aquaculture and bovine tuberculosis (TB) testing<sup>33</sup>.

At the time, we recommended in the short-term that the UK Government should add veterinary professionals to the Shortage Occupation List or its equivalent and continue to recognise existing MRPQ legislation through a transitional arrangement to mitigate against a sudden reduction in the veterinary workforce. The UK Government took action and in 2019, we welcome the Government's addition of veterinary professionals to the Shortage Occupation List.

The UK-EU Trade and Cooperation Agreement allows for Mutual Recognition Agreements (MRAs) to be negotiated on a sector-by-sector basis, and professional bodies on both sides can propose MRAs for the UK and EU to consider. Existing agreements on MRPQ include EU/Canada which grants semi-automatic recognition to architects<sup>34</sup>, and in 2023 the UK Financial Reporting Council signed a MoU on reciprocal arrangements<sup>35</sup> with its New Zealand equivalent under the UK-New Zealand trade agreement. This allows New Zealand-qualified auditors to apply to have their qualifications recognised in the UK, and vice-versa.

The workforce model developed by the Institute for Employment Studies (IES) on behalf of the Royal College of Veterinary Surgeons (RCVS) forecasts a much higher vacancy rate for government services (25%) than for other areas of veterinary practice which oscillate between 4 and 11%. They stated that in government service, supply was 79% of total demand in 2023, and although this will increase slightly to 2029, it will then fall so that in 2035 it is likely to be 78% of total demand<sup>36</sup>.



37

**Recommendation 10: The UK Government should prioritise the negotiation of a veterinary agreement with the EU as a matter of urgency. This agreement should aim to reduce trade and**

<sup>33</sup> *Brexit & the veterinary profession*. (2017). BVA. <https://www.bva.co.uk/media/3107/brexit-and-veterinary-profession-v10.pdf>

<sup>34</sup> *EU and Canada lay the foundations for free movement of architects*. (2022, March 21). European Commission; Trade and Economic Security. [https://policy.trade.ec.europa.eu/news/eu-and-canada-lay-foundations-free-movement-architects-2022-03-21\\_en](https://policy.trade.ec.europa.eu/news/eu-and-canada-lay-foundations-free-movement-architects-2022-03-21_en)

<sup>35</sup> *UK and New Zealand audit authorities agree mutual recognition of audit qualifications*. (2023, September 27). FRC (Financial Reporting Council). <https://www.frc.org.uk/news-and-events/news/2023/09/uk-and-new-zealand-audit-authorities-agree-mutual-recognition-of-audit-qualifications/>

<sup>36</sup> *New RCVS workforce model highlights need for more vets working in public health*. (2024, December 13). RCVS. <https://www.rcvs.org.uk/news-and-views/news/new-rcvs-workforce-model-highlights-need-for-more-vets-working/>

<sup>37</sup> Robinson, D., Sharma, M., & Williams, M. (2024). *2024 RCVS Workforce Modelling Report*. RCVS; Institute for Employment Studies on behalf of the RCVS. <https://www.rcvs.org.uk/news-and-views/publications/2024-rcvs-workforce-modelling-report/?destination=%2Fnews-and-views%2Fpublications%2F>

border controls by ensuring dynamic alignment on SPS measures, secure access of veterinary medicinal products for Northern Ireland, and include MRPQs when appropriate.

**Recommendation 11: An EU-UK-veterinary agreement could also, if appropriate, include MRPQs. RCVS would accredit those veterinary schools in the EU with equivalent syllabus and curriculum. This could help with the current and predicted workforce shortages in some areas such as public health.**

## Conclusions

BVA supports the negotiation of a UK-EU veterinary agreement using the principle of dynamic alignment and the Swiss Veterinary Agreement as a model. Dynamic legislative alignment will reduce the need for checks on live animals and paperwork and their routing via stated BCPs, ensuring that live animals are not detained or returned from the border, suffering from unnecessary stress and minimising any potential negative impacts on animal welfare, while mitigating some of the current pressures on the veterinary workforce arising from the current certification requirements.

Such an agreement could also benefit the UK's economy. Agri-food exports overall are worth £25 billion to the UK economy, and Aston University concluded that "the two years since the new trading rules were put in place have seen a fall of 5% in exports to the EU from 2019 levels, during a period where the sector has otherwise grown". They concluded that a veterinary deal with the EU would benefit the sector which could see an increase in exports from the UK to the EU by at least 22.5%<sup>38</sup>

While BVA strongly believes the principle of alignment used in the Swiss-style agreement should be generally beneficial to animal health and welfare and the veterinary profession, it will be important for any EU-UK veterinary agreement to include the provision for UK legislation to diverge, particularly around higher animal health and welfare standards.

---

<sup>38</sup> <https://www.aston.ac.uk/latest-news/veterinary-deal-would-increase-uk-agrifood-exports-eu-more-fifth-research-shows>