

**As of 27.09.18**

### **Position Statement: The veterinary profession in a 'no-deal' scenario**

The Royal College of Veterinary Surgeons (RCVS) role is to set, uphold and advance the educational, ethical and clinical standards of veterinary surgeons and veterinary nurses in the UK. This position paper outlines the impact of a 'no-deal' Brexit scenario on the UK's high standards of animal health and welfare, as well as public health, through its impact on the veterinary workforce.

EU-qualified veterinary surgeons make up a critical, and hitherto growing, part of the UK veterinary workforce. Currently, around 50% of veterinary surgeons<sup>1</sup> registering in the UK qualified elsewhere in the EU (approximately 1,000 vets a year<sup>2</sup>). Under existing arrangements these EU-qualified vets have the freedom to live and work in the UK, and the automatic right to register as veterinary surgeons in the UK (just as UK vets have the right to live, register and work elsewhere in the EU) under the Mutual Recognition of Professional Qualifications Directive (MRPQ).

The movement of these vets to the UK is likely to be disrupted by our exit from the EU, and they are highly unlikely to be replaced by additional UK-educated veterinary surgeons in the short term in any practical scenario. A reduction in the number of EU vets in the UK would not just affect clinical practice, but could have a particularly acute impact in the critical area of food safety and public health. Approximately 95% of vets currently working in public health for meat production in the UK are non-UK EU graduates<sup>3</sup> playing a vital role in ensuring the quality of meat and other animal products for import and export and in the monitoring of infectious diseases. Any significant barriers to the future registration or working rights of EU-qualified vets may have serious implications for both food standards and production and therefore both public health and animal welfare.

The government's Technical Notices show that a 'no-deal' Brexit scenario would also increase barriers to the export of animal products from the UK to the EU, and this would in turn considerably increase the number of veterinary surgeons required in the UK due to a significant rise in the need for veterinary certification of animals and animal products (estimated to be a 325% increase by the former Chief Veterinary Officer Nigel Gibbens<sup>4</sup>). This comes at a time when the existing shortage in

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<sup>1</sup> RCVS Facts 2016

<sup>2</sup> RCVS Facts 2016

<sup>3</sup> Brexit & The Veterinary Profession, British Veterinary Association, [https://www.bva.co.uk/uploadedFiles/Content/News,\\_campaigns\\_and\\_policies/Policies/Future\\_of\\_the\\_profession/brexit-and-veterinary-profession-v.1.0.pdf](https://www.bva.co.uk/uploadedFiles/Content/News,_campaigns_and_policies/Policies/Future_of_the_profession/brexit-and-veterinary-profession-v.1.0.pdf)

<sup>4</sup> Speaking at Official Veterinarian Conference 2017, reported <https://www.vettimes.co.uk/news/non-uk-vetsessential-after-brexit-says-cvo>

the veterinary sector overall is estimated to be 11%<sup>5</sup>, and when the meat production industry is reporting increasing challenges in veterinary recruitment<sup>6</sup>. Any reduction in the number of vets from outside the UK will clearly exacerbate this shortage. It is not yet clear how effective current government plans to ameliorate the additional certification requirements will be.

The veterinary education and research sectors could also be affected, with non-UK EU-graduate vets comprising around 22%<sup>7</sup> of academics who are responsible for educating the next generation of UK veterinary surgeons and carrying out research in areas such as new treatments, drug discovery, preventative and public health and improving clinical outcomes.

The government's Technical Notices also raise concerns about additional bureaucracy in relation to pet passports that could put further pressure on the veterinary workforce.

While we are working with government to examine the best way to boost domestic graduate numbers, it would take many years to expand domestic veterinary education sufficiently to be able to rely on UK graduates to make up any workforce shortages. The UK will continue to be reliant on non-UK-qualified veterinary surgeons for some years to come.

### **Assurance of standards**

We are aware of the argument that any shortfall in the number of EU-qualified vets as a result of Brexit would easily be remedied by recruiting vets from outside the EU. We have significant doubts about this. We already recruit a small percentage of our annual intake from universities in Australasia, South Africa and North America whose qualifications we recognise due to formal arrangements that assure us of the educational standards of those veterinary graduates. It would not be easy to increase significantly the number of vets coming from those countries, some of which face their own veterinary shortages.

Recruitment from other third countries is difficult, as at present we have no means of assuring that their veterinary educational standards are equal to those of the UK. Veterinary graduates from these countries are required by UK law to pass the RCVS 'Statutory Examination for Membership' before they can register here, and this is a substantial barrier to recruitment. Removing these barriers could amount to a lowering of veterinary standards in the UK, with all the attendant risks to animal health and welfare and public health.

Aside from issues around guaranteeing professional standards, it is worth noting that veterinary surgeons from the countries mentioned above, as well as the rest of the world, would be subject to the Home Office's immigration and visa regime, more details of which are outlined below.

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<sup>5</sup> RCVS Facts 2016

<sup>6</sup> 'Meat inspectors shortage 'crisis' blamed on Brexit', BBC, <https://www.bbc.co.uk/news/uk-wales-44886259>

<sup>7</sup> Veterinary Policy Research Foundation, 2016. Brexit - Veterinary Fact File. [Online] Available at: <https://vprf.files.wordpress.com/2016/10/brexit-impacts-for-website.pdf>

In the event of a 'no-deal' scenario the RCVS would be in a position to restrict the registration of graduates from certain EU veterinary schools where we do not have sufficient assurance of educational standards, as their degrees are not approved or accredited by the European Association of Establishments for Veterinary Education (EAEVE), a quality assurance body from which all UK vet schools that offer RCVS-accredited degrees have approval or accreditation. This would only impact a small minority (approximately 13%) of EU veterinary applicants per year<sup>8</sup>, a percentage that can be expected to decline as more European veterinary schools gain accreditation. This minority of applicants would still be able to join the RCVS Register after passing our Statutory Membership Examination. Moving to a policy of recognising EAEVE-approved/accredited veterinary schools could also smooth the path to registration for graduates of non-EU veterinary schools in countries such as Turkey. Further, unlike under the existing MRPQ system, it would facilitate the registration of non-EU citizens who graduate from EU veterinary schools.

### **Impact of possible changes to the visa regime**

However, we are concerned that a 'no-deal' scenario could have a much more significant impact on the number of vets moving to the UK from the EU. The recent Migration Advisory Committee (MAC) report<sup>9</sup> recommends that these vets should become subject to the visa regime, with attendant fees and bureaucracy, creating a significant barrier to living and working in the UK.

While we welcome the MAC's recommendation to remove the cap on the form of visa that would apply to veterinarians from third countries, we are concerned that any benefit would be undermined by any overall cap on visas. If the government retains its policy of reducing immigration to below 100,000, veterinary surgeons would need to make up around 1% of that quota<sup>10</sup> in order to maintain current numbers. Given that we are in competition with other, much larger, sectors and professions that may be prioritised over veterinary surgeons, this presents a real challenge and reason for concern. It is for this reason that in 2017 we issued an urgent call to the Home Office for vets to be placed on the Shortage Occupation List to enable employers more to easily gain visas for overseas, including EU, veterinarians<sup>11</sup>.

It is clear that, due to the UK's current dependence on the many skilled individuals who qualify in other countries and come to work in the UK, any restriction in movement is highly likely to exacerbate the current shortage of vets.

As of June 2018, the RCVS Register included 7,729 non-UK European nationals, of whom 81% were registered as UK-practising<sup>12</sup>, with 87% of these being employed full-time<sup>13</sup> according to a survey

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<sup>8</sup> RCVS Register 2013-2017

<sup>9</sup> Migration Advisory Committee (MAC) report: EEA migration, <https://www.gov.uk/government/publications/migration-advisory-committee-mac-report-eea-migration>

<sup>10</sup> RCVS Facts 2016

<sup>11</sup> Joint RCVS-BVA submission to the MAC review: <https://www.bva.co.uk/news-campaigns-and-policy/newsroom/news-releases/strong-case-vets-shortage-occupation-list/>

<sup>12</sup> RCVS UK-Practising Register, June 2018

<sup>13</sup> European veterinary surgeons working in the UK: The impact of Brexit, Institute for Employment Studies, 2017

conducted by the Institute of Employment Studies (IES) on our behalf. This compares with only 65% of all vets being employed full-time, which clearly illustrates how EU-qualified vets make an even more significant contribution to our workforce than their numbers suggest.

The same survey of non-UK EU graduates conducted by IES showed that 77% of respondents believe that EU-graduate vets are now less likely to apply to join the RCVS Register. These sentiments are supported by evidence that 40% of non-UK EU vets are already considering leaving the country, with 18% already actively looking for work outside of the UK. Our registration data also shows that new EU registrations have levelled off since the referendum, after a decade of year-on-year growth.

### **Conclusion**

The RCVS is concerned that a 'no-deal' scenario could:

- Raise barriers to the registration of EU/EEA-qualified veterinary surgeons in the UK at a time when the UK has a significant shortage of veterinary surgeons and is dependent on EU-qualified vets to meet the demand for veterinary services.
- Increase trade barriers for products of animal origin, greatly increasing the need for veterinary certification in a sector that is highly dependent on EU-qualified vets and already struggling to recruit sufficient vets.
- Increase bureaucratic burdens on the veterinary workforce.
- Due to a combination of the above, put both animal health and welfare and public health at risk by greatly exacerbating the existing shortage of veterinary surgeons.

We strongly recommend that these concerns are taken into account when considering the practicability of a 'no-deal' outcome of the Brexit negotiations.

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The RCVS is working with the British Veterinary Association (BVA) and the Department for Environment, Food & Rural Affairs (DEFRA) as part of the Veterinary Capability and Capacity Project (VCCP), which aims to address in advance any potential issues that could arise due to our exit from the EU.