

Notes to accompany the letter to Ministers

These notes are intended to be read in conjunction with our letter dated 17th October 2022 describing the looming market disruption that will occur on 13 December 2022 when new UK-only rules are introduced by Defra. They provide additional information and background explanation of the issues and offer an alternative solution to avoid damage to the UK's meat export market.

Existing regulations

The European Union made changes to their Animal Health Regulations (AHR) to include the need for farms to receive 'regular' animal health visits by a veterinarian in order that the meat from those animals can be exported to the EU.

The purpose of these farm visits is to verify the absence of Notifiable Diseases, despite the fact that, as a country, the UK is recognised as being 'free' of such diseases. Nevertheless, the need for farm visits by vets is accepted by industry and is already being met.

Nowhere in the AHR does it stipulate the frequency of the visits or the method by which a farm must prove that a visit has taken place. This is for the competent authorities in the exporting country to determine and is not specified in the EU's Animal Health Regulations.

Until May this year, the evidence that these visits had taken place could be provided by farmers supplying a *farmer* declaration which has been previously agreed with Defra and the Food Standards Agency.

Defra's proposed new regulations & their implications

In May this year, without any consultation or discussion with industry, Defra quietly changed the requirement from a *farmer* declaration to a *veterinary* attestation with immediate effect. The change was not publicised or even communicated to anyone in the industry but simply changed in the Notes for Guidance.

As soon as the change was discovered, we asked Defra to postpone its implementation to allow time for proper consultation. They moved the date to 13 December but, we are concerned that the damage that will be done to the UK export market has not been recognised.

For these new vet attestations to be produced and replace the existing farmer declarations, each farm affected will require a new visit for a vet to be prepared to sign these new documents.

Defra has confirmed that farms already covered by a UK Farm Assurance scheme do not need to meet this new requirement, however there are thousands of animal holdings across Great Britain that do not belong to one of these schemes and will therefore need to have a signed veterinary visit before 13 December. This is not achievable.

To give an idea of the scale of the problem, there are currently around 72,500 sheep holdings and 54,500 cattle holdings in Great Britain. Red Tractor's assurance scheme membership

consists of 27,566 assured beef and 20,361 lamb holdings. Our understanding is that beef and lamb membership is around 7,000 for Wales (12,000 holdings) and 9,000 for Scotland.

This leaves thousands of farms at risk of not being able to export if they are unable to provide a veterinary attestation. It will mean that Official Veterinarians at abattoirs will refuse to sign Export Health Certificates because they do not have documentary evidence of a farm visit which has been signed by a vet.

The meat supply chain is complex and relies on UK firms being able to export parts, but not all of an animal carcase in order to make it viable. Regardless of how much meat is sold on the UK market, if firms are unable to export items such as skins, hides, offal and other valuable fifth quarter materials, the drop in revenue will have to be recovered either by lowering the price paid for animals at the farm gate or raising the price of the meat destined for British supermarket shelves.

We are still yet to receive consensus from DEFRA on how this information should be presented and moved through the system from farm to processor and how this would work for stock moving through auction markets. For example, we still have no indication whether multiple non-certified copies and copies of copies would be acceptable.

Shortage of Vets

The ongoing shortage of veterinarians has been an issue since we left the EU, which has seen an increased workload for a reduced number of UK vets after many chose to return to the EU.

If Defra implement this UK-only bureaucracy, this will create a bottleneck and farmers will be left waiting a considerable amount of time before a vet would be available to perform the new checks and issue the paperwork required to keep the supply chain moving efficiently.

To put this in perspective, even if we started today, it would take many months to complete the thousands of vet visits to farms that would be needed if Defra proceed with this new requirement with other work being impacted for this to be prioritised.

The veterinary profession takes pride in being able to adapt and respond to changing legislation or requirements and have demonstrated this on many occasions. However, clarity and definitions about what is required and the time frames need to be supplied.

Government is currently examining excessive bureaucracy and red tape and asking departments to model reducing their headcounts by up to 40% in some cases. However, this new requirement from Defra is taking us in the opposite direction, adding an extra layer of bureaucracy that's not required by the EU, while at the same time increasing food price inflation pressures.

If the Food Standards Agency, which is responsible for these veterinary inspections, is asked to cut numbers, this can only exacerbate the problem.

Proposed alternative solution

Regardless of the 13 December deadline we feel this change should not occur, as it adds unnecessary complication to how the information is moved around the system. As an industry we firmly believe the only way this can be implemented is through a digital solution based on holding the information on a database such as the Livestock Information Programme. We further believe that, until such an option is available, we should continue with the current approach of using farmer declarations.

If Defra insist on implementing the change, at the very least we would need a longer implementation period during which farmer declarations are accepted.

A suggestion by industry has been to combine the voluntary Government Pathway program launched this year with the requirement for an attestation determining a farm veterinary visit has taken place. However, this may partly resolve the request for a veterinary attestation by the UK competent authorities, but it does not resolve the issue of how the information would move throughout the supply chain. For this to happen there would need to be a digital solution.