

BVA submission to the House of Lords EU International Agreements Sub-Committee: UK-Australia Trade Negotiations

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, 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 provide evidence in relation to ongoing UK-Australia trade negotiations, recognising that agreeing a comprehensive free trade agreement (FTA) is a priority for the UK as we approach the end of the transition period.
- 3) Veterinary surgeons deploy their expertise across domestic food production, from farm to fork, ensuring UK production meets the highest standards of animal health, animal welfare and food safety, and providing assurance to trading partners. The inclusion of veterinary surgeons as part of trade negotiation teams, trade missions, and within embassies is the norm for many of our trading partners, and as such the UK should bolster its trade personnel with veterinary expertise.

Animal health and welfare standards

- 4) Veterinary surgeons, as qualified professionals who play an essential role in the operation of international trade, want to see a high standard of animal health, welfare and food hygiene prioritised within any trade negotiations and deals, including with Australia. High UK animal health and welfare standards have been recognised within the Agriculture Bill as public goods, and as such will be able to receive financial support. We strongly support this approach, having called on the Government to use public money to incentivise and support animal health and welfare outcomes as public goods in our Veterinary Vision for Post Brexit Agriculture Policy¹.
- 5) Future trade deals have the potential to undermine this investment by allowing goods produced to lower standards of animal health and welfare which would inevitably hold a competitive advantage over UK farmers, undercutting UK producers on price. We have welcomed the formation of the Trade and Agriculture Commission, which will consider the policies that the UK Government should adopt in free trade agreements. We support the appointment of BVA past President Simon Doherty to the Commission's 'Standards Working Group'.
- 6) Animal welfare is a global concern and ensuring the health and welfare of sentient animals is important as a marker of social progress, as well as for the role it plays in achieving other sustainability objectives. UK citizens see value in the welfare of farmed animals. UK farm assurance schemes empower shoppers to make sustainable and ethically informed choices about the food they buy, including the impact of food production on animal health and welfare. Assurance schemes allow farmers to demonstrate that the food they have produced has met specific, independently certified standards at each stage of the supply chain from 'farm to fork'. These standards include animal health and welfare, food safety, stockmanship training and competencies, and environmental protection. It is essential that the consumer confidence such assurance schemes attract is not undermined by imports from systems where standards are

¹ <https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brexit-agricultural-support.pdf>

lower than the UK.²

- 7) Animal welfare standards diverge significantly between the UK and Australia. The Animal Protection Index gives the UK a B grade in overall animal welfare, whereas Australia holds a D grade.³ Defra and the relevant devolved administrations of the UK act in accordance with the guiding principles of the World Organisation for Animal Health - the OIE - with all eight points of the OIE's Guiding Principles for Animal Welfare incorporated by legislation, including through the Animal Welfare Act 2006, the Animal Health and Welfare Act 2006 (Scotland) and the Welfare of Animals Act (Northern Ireland) 2011. In comparison, the lack of a national strategy for animal welfare in Australia acts as a barrier for full implementation of OIE standards and continual improvement.⁴
- 8) Although Australia is working towards converting the Model Codes of Practice into Australian Animal Welfare Standards and Guidelines aimed at harmonising and streamlining livestock welfare legislation, progress has been slow and concerns have been raised that the development of the standards are being unduly influenced by industry. Extreme confinement systems for pigs and poultry are still permitted, and at present the slaughter of non-stunned animals remains allowed in all States and Territories in Australia. The Model Code of Practice for Domestic Poultry requires that 'birds must be slaughtered in a manner that minimises handling and stress' but it is not mandated that birds shall be stunned before being slaughtered.⁵ The recently published BVA position on the welfare of animals at slaughter recommends that "all animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering."⁶
- 9) The use of some Hormonal growth promoters (HGP) in beef is approved in Australia. In the UK, the use of growth promoters is banned, or severely restricted for clinical use only. Within the UK, Australian beef would become indistinguishable from UK produce, jeopardising the ability of exporters to trade using the good reputation of the UK as a high animal health and welfare producer. This would increase the risk that goods leaving the UK would fail to meet EU standards. Consequently, there would be a need for additional risk-based checks on Great British goods entering the EU Single Market, and potentially Northern Ireland. This would place additional delays on producers selling into the EU.
- 10) In our recent response to the Public Bill Committee on the Trade Bill 2019-2021 we indicated support for proposals to establish a UK body – the Trade Remedies Authority (TRA) – to ensure the UK can continue to protect domestic industries against injury caused by unfair trading practices, such as dumping and unforeseen surges in imports. This non-departmental public body, responsible for conducting trade remedies investigations under a statutory framework provided by the Taxation (Cross-border Trade) Act 2018 and for making impartial recommendations to the Secretary of State, should provide a critical safety net for the livestock industry. However, this does not negate the need for Government to secure the inclusion of high welfare standards for farm animals in all trade agreements it negotiates.
- 11) As the UK takes control of its trade policy, it should be assertive in spreading animal welfare norms via trade agreements. Therefore, any free trade agreement with Australia must have an ambitious and comprehensive animal welfare chapter, including detailed provisions on animal welfare cooperation.

² <https://www.bva.co.uk/take-action/our-policies/farm-assurance-schemes/>

³ <https://api.worldanimalprotection.org/compare>

⁴ <https://api.worldanimalprotection.org/country/australia>

⁵ <https://api.worldanimalprotection.org/country/australia>

⁶ <https://www.bva.co.uk/media/3664/full-position-bva-position-on-the-welfare-of-animals-at-slaughter.pdf>

Sanitary and Phytosanitary (SPS) measures

- 12) The great majority of FTAs now contain provisions on sanitary and phytosanitary (SPS) measures i.e. measures to protect humans, animals, and plants from diseases, pests, or contaminants. In the most recent and wide-ranging trade agreements, such as the EU-Canada Comprehensive Economic and Trade Agreement (CETA), the 11-party Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) or the abortive EU-US Transatlantic Trade and Investment Partnership (TTIP), SPS issues have often taken centre stage.
- 13) Currently, there is no comprehensive FTA in place between the EU and Australia that the UK can replicate. Nor is there a free-standing veterinary agreement. However, on 22 May 2018, the Council of the European Union adopted the decision authorising the opening of negotiations for an FTA between the EU and Australia.
- 14) Securing an FTA with Australia, which reduces tariff barriers as well as simplifying SPS requirements, within the confines of Australia's necessarily extremely strict SPS measures, could present an opportunity for the export of products of animal origin (POAO). Developing a strong dialogue between the UK and Australia could support the reduction in SPS barriers over time. However, this opportunity should only be taken with significant guarantees and progress on the animal welfare concerns raised above.
- 15) The UK government should develop a process whereby vets, farmers and processors are engaged to identify unnecessary SPS barriers with trading partners. This could form a key component of the UK's trade strategy, akin to the United States Trade Representative's National Trade Estimate Report on Foreign Trade Barriers.⁷ Similarly, the EU has the Market Access Database which lists SPS issues for trading nations including Australia.⁸ For example, removing barriers to the export of sheep germplasm to Australia would open a new market for the UK.

Veterinary capacity

- 16) Vets both certify and supervise the import and export of animals and animal products to and from third countries. The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. To continue to trade, the UK will need enough vets to meet the additional demands for export and import certification.
- 17) From January 2021, exporters will require an export health certificate (EHC) signed by an Official Veterinarian (OV) to transport animals, products of animal origin or germplasm from the UK to the EU. The OV signature attests that relevant public health and animal health requirements have been met. The requirement for EHCs will be similar if the UK and EU reach a free trade agreement, or if no trade deal is agreed. However, there are material uncertainties and limitations on knowing what the exact increase in export health certification is likely to be. When preparing for a no-deal exit in 2019, Defra's "mid estimate" assumption was a fivefold increase in the number of EHCs.
- 18) The veterinary profession is concerned that there will not be a workforce with the capability and capacity necessary to facilitate international trade both with the EU and other trade partners including Australia.

Antimicrobial resistance

- 19) The UK Government has demonstrated strong leadership at home and globally in tackling the issue of antimicrobial resistance. Thanks to these efforts, action has been taken at all levels, including at the United Nations, within the EU and domestically. Encouraged by the publication

⁷ https://ustr.gov/sites/default/files/2020_National_Trade_Estimate_Report.pdf

⁸ https://madb.europa.eu/madb/sps_crossTables.htm?isSps=true&table=countryproduct

of the O'Neill Review on Antimicrobial Resistance⁹, the UK agricultural and food industry has taken steps to advance and promote the responsible use of antimicrobials. Alongside our specialist divisions, we are a member of the Responsible Use of Medicines in Agriculture (RUMA) alliance, which launched sector-specific reduction targets for antimicrobial use in late 2017, resulting in a reduction in overall sales, and sales of the most critically important antimicrobials.¹⁰

20) Australia's response to AMR recognises the effects on human and animal health, agriculture, food and the environment. Their response involves action across all these sectors and the Council of Australian Governments has endorsed a new National AMR Strategy.¹¹ This represents a further opportunity for the UK to market high-quality produce where reduced use of antimicrobials can be demonstrated.

Conclusion

21) A trade deal with Australia presents a number of opportunities:

- A reduction in tariffs to enable exports of UK food produced with high standards of animal health and welfare.
- Sending a strong message on the UK's expectations for animal welfare standards to other potential trade partners by agreeing an ambitious and comprehensive animal welfare chapter.
- Cooperating on SPS processes to simplify procedures between the two markets and remove access barriers for UK producers, recognising Australia's necessarily extremely strict SPS measures.

22) However, there are significant animal welfare concerns that must be addressed, and in all respects the UK must safeguard its reputation for animal health, animal welfare, and food safety. In order to do that, it is essential that those standards are upheld in trade negotiations. Products which do not conform to the animal health and welfare standards, which UK consumers expect and value, risk undermining 'Brand Britain' and have the potential to irreparably damage the UK agricultural sector. In all trade agreements it negotiates, the Government must secure the inclusion of equally high standards of animal health, animal welfare, public health, food safety and responsible antibiotic use.

⁹ <https://amr-review.org/>

¹⁰ <https://www.ruma.org.uk/wp-content/uploads/2018/11/RUMA-TTF-1-year-on-Full-Report-FINAL.pdf>

¹¹ <https://www.amr.gov.au/australias-response>