

BVA submission to the Department for International Trade consultation on UK trade negotiations: Gulf Cooperation Council (GCC)

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 relating to a potential free trade agreement (FTA) with the Gulf Cooperation Council (GCC) which consists of Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates.
- 3) Agreeing comprehensive FTAs with the GCC that reduce barriers whilst maintaining standards of animal health, animal welfare and public health offers an opportunity for the export of UK products of animal origin (POAO).

Trade and Agriculture Commission

- 4) Greater clarity is needed on the role of the Trade and Agriculture Commission (TAC). We would ask that procedures are put in place, as a matter of urgency, to support the role of the TAC in advising Parliament.
- 5) The original TAC was established to advise the UK government on how best to advance the interests of British farmers, food producers, and consumers in future trade agreements. Veterinary perspectives were included on the TAC. Former UK CVO Nigel Gibbens sat on the TAC, and former BVA President Simon Doherty joined the Commission's standards sub-group. The Commission reported in March 2020.
- 6) BVA has welcomed the announcement by Government that it would place the TAC on a statutory footing.¹ Chaired by Lorand Bartels, Professor of International Law, the new TAC will provide expert scrutiny of new trade deals once they reach the signature stage.
- 7) The new TAC was announced on 21 October 2021. Nearly three months later, it is still not clear that the TAC is ready to provide robust scrutiny of the UK-Australia FTA. It is vital that government clearly establishes how the TAC will operate and provide its analysis to Parliament ahead of the introduction of the UK-Australia FTA. The Government should ensure that the TAC is given the time it needs to carefully scrutinise the free trade deal with Australia, and subsequent FTAs such as any potential deal with the GCC, and to advise Parliament in a timely manner.

Engagement with the veterinary profession

- 8) The UK has a world-leading reputation for animal health, animal welfare, and food safety. UK production meets the highest standards of animal health, animal welfare and food safety thanks to veterinary surgeons who deploy their expertise across domestic food production, from farm to

¹ <https://www.bva.co.uk/news-and-blog/news-article/bva-welcomes-important-step-for-animal-health-and-welfare-as-government-puts-trade-and-agriculture-commission-on-legal-footing/>

fork, ensuring. They also play a unique role in international trade which is recognised around the world. The involvement of veterinary surgeons on farm and in abattoirs protects public health, food safety and animal health and welfare as well as providing assurance to trading partners. Veterinary advice and involvement at all stages of negotiations will serve to facilitate acceptable trade.

- 9) The UK requires a veterinary workforce with the capability and capacity necessary to facilitate international trade. To continue to trade, the UK must have enough appropriately trained Official Veterinarians (OV) to meet the additional demands for export and import certification. If that requirement is not fulfilled, it could present a significant barrier to trade and limit any opportunities for the farming and food sectors that may be found in a new FTA.
- 10) FTAs contain provisions relating to animal health, animal welfare and public health: areas which fall within the expertise of the veterinary profession. Therefore, it has been disappointing that consultation with the veterinary profession on FTAs has been so limited. DIT held no meeting with the profession prior to the publication of the recent Australian Trade Deal. This is despite the BVA submitting an 8-page consultation response in 2018 highlighting serious concerns about animal welfare in Australian agriculture.
- 11) This poor engagement has highlighted the need for genuine veterinary input into future trade negotiations. As the UK continues to strike new trade deals with partners around the world, which will have consequences for animal health, animal welfare and public health, as well as the ability to export easily to the EU Single Market, we would ask that the Department for International Trade, and Defra which leads on SPS aspects, reflect on how better to engage with our uniquely relevant profession.
- 12) We note the existence of the Agri-food Trade Advisory Group. However, the membership of this group consists of business representative organisations and contains nobody from a veterinary, animal health, food safety or animal welfare science background. Therefore, engagement with this group can in no way be seen as meeting a requirement to have consulted on the wide range of concerns held by the veterinary profession.
- 13) It is welcome to see veterinary expertise represented within the membership of the TAC. It will also be essential that this strengthened body draws upon additional veterinary expertise to scrutinise future trade deals and put animal health and welfare at the centre of decision making.
- 14) When the impact of trade deals on animal health and welfare is considered, there is often a focus on the effect on agriculture and aquaculture sectors. However, there is the potential for positive and negative impacts on wider sectors such as companion animals, equines, and wild animals. For example:
 - Agreements on the regulation of the pharmaceutical and medical device markets could potentially allow medicines or devices to enter the UK and be used to treat animals across all sectors.
 - Other areas of potential impact for veterinary services include imports of goods such as textiles, chemicals and IT equipment.
 - Delivery of services, particularly those relating to remote telemedicine and recognition of professional qualifications.

- Any discussions on the removal of quarantine that would allow free access to pet animals would raise very significant concerns about diseases which are endemic in other countries.

15) It is imperative for mechanisms beyond the TAC to be developed to give due regard to the impact of trade deals on animals which will be considered sentient beings under legislation currently before Parliament i.e., beyond agriculture and aquaculture sectors. Engagement with the veterinary profession will be vital for government to meet this duty.

Sanitary and Phytosanitary (SPS) measures

16) Imports of both animals and animal products may carry pathogens that can represent a threat to UK public health and the health of livestock, wildlife and pet animals. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants.

17) SPS measures serve a vital purpose: protecting national freedom from animal health diseases (e.g., Foot and Mouth Disease and African Swine Fever). The consequences of failing to maintain freedom from disease can be costly. This was most vividly illustrated by the Foot and Mouth outbreak in 2001. This was estimated to have cost £5 billion to the private sector and £3 billion 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.²

18) More concerning recently has been African swine fever (ASF), which is a fatal and highly infectious disease. ASF has spread to all provinces in China and is moving West and has been detected as near as Belgium.³ An assessment⁴ of the economic losses caused by ASF outbreaks in China between August 2018 and July 2019 showed a total economic loss that accounts for 0.78% of China's gross domestic product in 2019, with impacts experienced in almost all economic sectors through links to the pork industry and a substantial decrease in consumer surplus. Scenario analyses demonstrate that the worst cases of pig production reduction and price increase would trigger 1.4% and 2.07% declines in gross domestic product, respectively. These findings demonstrate an urgent need for ASF containment.

19) SPS measures form a vital part of the UK's biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. In the broadest sense, biosecurity can be said to cover every aspect of disease control, prevention and treatment, all of which are areas that rely upon the knowledge and skill of veterinary professionals.

20) "Rabies is a fatal viral disease that continues to threaten human and animal health in endemic countries. Rabies is endemic in animals in the Arabian Peninsula. Although Saudi Arabia is the largest country on the Peninsula, little has been reported in the country about the rabies situation."⁵ Therefore, any potential discussions on quarantine requirements for pet animals that

² National Audit Office, *The 2001 Outbreak of Foot and Mouth Disease*, 2002

³ Updated Outbreak Assessment #10 African swine fever in Europe (Eastern Europe & Belgium) 23 March 2020

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874897/asf-east-europe-update10.pdf

⁴ Shijing et al (2021) You African swine fever outbreaks in China led to gross domestic product and economic losses *Nature Food* volume 2, pages 802–808 (2021) <https://www.nature.com/articles/s43016-021-00362-1>

⁵ Kasem et al (2019) Rabies among animals in Saudi Arabia, *Journal of Infection and Public Health*, Volume

may form part of FTA negotiations must consider any risk of introducing disease into the UK. Consequently, the inclusion of veterinary surgeons as part of trade negotiation teams will be vital. This is the norm for many of our trading partners, and we strongly believe the UK should bolster its trade personnel with veterinary surgeons who can provide an unparalleled level of assurance to trading partners.

- 21) The great majority of new free trade agreements (FTAs) now contain provisions seeking to simplify SPS trade requirements. SPS issues have often taken centre stage in the most recent and wide-ranging trade agreements. An FTA with the GCC should create a forum where opportunities to simplify SPS requirements or remove barriers can be agreed. This work is often technical and requires professional knowledge, hence the importance of veterinary surgeons within the trade sphere.
- 22) To support cooperation on SPS barriers under a new FTA, the UK Government should develop a process whereby vets, farmers and processors are engaged to identify unnecessary SPS barriers. This could form a key component of the UK's ongoing cooperation with the GCC nations on SPS issues.
- 23) Within any FTA the UK should not permit imports that fail to meet the current high animal and public health standards of the UK market. Within the UK these goods 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.
- 24) The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets. A single standard that includes veterinary controls and certifications will avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards, avoid compromised animal health, animal welfare, and public health and ensure consumer confidence at home and abroad.

Tariff reduction and standards

- 25) 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. 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 the GCC.
- 26) The TAC published its report in March 2020. Key amongst their recommendations was recommendation 8 which stated that:⁶

“The UK government should take an ambitious approach to the liberalisation of the UK's import tariff regime, for countries that can meet the high standards of food production expected from UK producers. It should work with trading partners within future FTA negotiations to lower tariffs and quotas to zero where equivalence is demonstrated for these standards.”

- 27) The report submits that the UK should adopt a three-pillar approach to liberalising international

12, Issue 3, 2019, Pages 445-447,
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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/969045/Trade-and-Agriculture-Commission-final-report.pdf

trade. The most pertinent, for the purposes of an FTA, is pillar two, which establishes how “core standards” should be developed:

“Zero tariff, zero quota access to UK markets in FTAs would be matched to a core set of standards and technical norms in a number of areas. If trading partners could not demonstrate equivalence with core standards, then they would not be considered for zero tariff, zero quota access for those products to which the core standards applied. These standards and technical norms would:

- *reflect the shared ambitions of the UK and its trading partners;*
- *be derived from international standards and norms; and*
- *already be applied in the UK.*

The UK government should negotiate on the basis of this core set of standards, including climate change, environmental, ethical and animal welfare measures. When determining these priority standards, the UK government should take account of domestic production standards and the extent to which they reflect international standards’ agreements. Implementation of this pillar would require further analysis and consultation, particularly with the Devolved Administrations. Determining which standards and norms should be considered as part of this pillar would need to involve consultation with all stakeholders. Agreement of a broad and comprehensive core set of standards would maximise the trade liberalisation that this approach could deliver.”⁷

- 28)** As a matter of urgency, and before initiating further FTA negotiations, the UK Government should adopt this recommendation of the TAC. Core standards should be developed before the UK offers tariff-free access to its market. Consideration needs to be given to how the UK would determine a standard as being equivalent to these core standards. It will be vital to have engagement with the veterinary profession in developing these standards. This will require a system requiring checks and continuous monitoring to ensure standards are maintained over time.
- 29)** Antimicrobial resistance (AMR) is a global health and development threat and requires urgent multisectoral action. The WHO has declared that AMR is one of the top 10 global public health threats facing humanity⁸ and therefore AMR must be a significant factor in UK core standards. This standard should consider both regulation (e.g., prescribing requirements) and actual outcomes in terms of antimicrobial use or sales data.

Non- stun slaughter

- 30)** The Agriculture and Horticulture Development Board estimates the global trade in halal meat is worth around £550 billion and is set to double in the next 30 years.⁹ This is an opportunity afforded by an FTA with the GCC.
- 31)** Opening export opportunities for the UK’s produce is welcome, but in order to capitalise on our reputation for high standards, it’s essential that any future deals are only for products that are

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/969045/Trade-and-Agriculture-Commission-final-report.pdf

⁸ <https://www.who.int/news-room/spotlight/10-global-health-issues-to-track-in-2021>

⁹ <https://www.nfuonline.com/archive?treeid=150358>

pre-stunned before slaughter. Effectively stunning before slaughter is essential as this renders animals unconscious and therefore insensible to pain, distress, fear and suffering

- 32) While it is a statutory requirement for all animals to be effectively stunned before slaughter in the UK, there is a derogation in place to permit slaughter without stunning for slaughter in accordance with religious rites which provides for non-stun slaughter where food is intended for the consumption of Jews and Muslims.
- 33) For meat to be considered halal, Islamic scholars must be satisfied that the animal is alive at the point of slaughter and that the stunning method does not cause death. In the UK there are differences of opinion between Islamic scholars and, in turn, Halal certification bodies as to whether they will accept pre-slaughter stunning. Where Islamic scholars and Halal certification bodies do accept stunning,¹⁰ only methods that deliver an effective recoverable stun are accepted, ie. a stunning method that renders the animal unconscious and insensible to pain but does not kill the animal before neck cutting.
- 34) Ultimately, we would like to see an end to all non-stun slaughter.¹¹ However, where non-stun slaughter is permitted, the supply of meat from non-stunned animals should meet the demand of the religious communities in the UK. Therefore, the export of meat from non-stunned animals should be prohibited in law. We recommend the UK governments should introduce a non-stun permit system to ensure the number of animals slaughtered without prior stunning does not exceed the demand of the UK's religious communities. This model is currently successfully employed in Germany and Austria.^[2]
- 35) A 'Demonstration of Life' (DoL) protocol designed to give Muslim consumers' confidence that animals subject to head-only electrical stunning meet the religious requirements for halal meat has been launched. The move is the result of partnership working between government, meat industry, farmers' unions, vets, Islamic scholars and Halal certification bodies. The protocol was launched by Lord Goldsmith and is supported by the Animal Welfare Committee, which advises Defra.
- 36) The framework will allow the UK to certify specific recoverable stunning methods for small ruminants to confirm that these methods do not result in death before the point of exsanguination. A similar framework has been successfully implemented in New Zealand and provides assurances that recoverable stunning does not result in death for small ruminants^[3]and which supports that country's sheep meat exports to Muslim-majority countries. There is, therefore, a model for the UK to follow to successfully market our produce to this growing market whilst meeting the requirements for Halal production and upholding our standards and reputation for animal welfare.

Animal welfare and AMR chapters

¹⁰ <https://www.ifta.org.uk/blog/stunned-meat>

¹¹ <https://www.bva.co.uk/media/3664/full-position-bva-position-on-the-welfare-of-animals-at-slaughter.pdf>

^[2] The Law Library of Congress, 2019. Legal Restrictions on Religious Slaughter in Europe .Available at: <https://www.loc.gov/law/help/religious-slaughter/europe.php>

^[3] Fuseini, A., Knowles, TG., 2020. The ethics of Halal meat consumption: preferences of consumers in England according to the method of slaughter. Veterinary Record 186, 644. Available at: <https://veterinaryrecord.bmj.com/content/186/19/644>

- 37) We have called on Government to include ambitious and comprehensive animal welfare chapters within all new FTAs, including detailed provisions on animal welfare cooperation. Similarly ambitious provisions for collaboration on antimicrobial resistance should also be a priority.
- 38) The membership of forums established under FTAs to enable this collaboration will be important. We would ask the UK government to consider the balance of expertise it proposes for any such groups. Defra, as the UK Government department with responsibility for animal welfare, should lead on this process. The involvement of veterinary surgeons will be essential.
- 39) The UAE is a key export destination for seafood from the UK. In 2019, the UK exported 1,266 tonnes of seafood to the UAE with value of £10.5m.¹² The top species included farmed salmon. Given this significant trade in fish between the two nations, fish welfare expertise would be beneficial to any group.

Geographical Indications

- 40) High animal welfare standards and high environmental standards reinforce the marketability of our produce. So, within its trade policy, the UK Government should look to maximise opportunities to promote high-quality, high-welfare UK produce to export markets, including those products which might benefit from labelling that demonstrates region of origin (e.g. Scottish salmon, Welsh lamb and Yorkshire Wensleydale cheese). This can help secure opportunities for UK farmers and open up new export opportunities.
- 41) It is therefore welcome to see that FTAs include a provision allowing more British products to receive protected recognition in these markets.

Conclusion

- 42) The UK must safeguard its high reputation for animal health, animal welfare, and food safety. In all trade agreements it negotiates, the government must only grant tariff free access to agricultural goods where there is equivalence with core standards of animal health, animal welfare, public health and food safety and responsible antibiotic use.
- 43) Ongoing consultation with the veterinary profession on all relevant aspects of trade will be essential. BVA, as the representative body for the profession, looks forward to engaging with DIT further as this trade negotiation and others progress.

¹² <https://fishfocus.co.uk/export-market-in-uae-webinar/>