

BVA response to Trade and Agriculture Commission Call for Evidence - CPTPP

14 August 2023

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With nearly 19,000 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 on the UK accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership and what it means for animal health and welfare. Leaving the European Union has meant that the UK has been able to take control of its trade policy, providing the opportunity to be more assertive in spreading animal welfare norms via trade agreements. It is vitally important that existing animal health, animal welfare, public health, veterinary medicines, workforce, and environmental protection standards are at least maintained and opportunities to improve and enhance standards and outcomes should also be taken.

What impact could the UK's accession to the CPTPP have on animal health and welfare standards?

- 3) It is essential that 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. It is our view that FTAs should commit all parties to promote cooperation on welfare standards and be supportive of future research on animal welfare standards. Trading partners should also promote and maintain food safety standards to the level of the country with the higher standards, it should be an ongoing conversation between both countries on how they can better support animal welfare and food safety standards in food production and trade.
- 4) We are concerned about the impact that the UK's accession to the CPTPP will have on animal health and welfare standards and the potential it has to undo years of progress towards higher welfare standards for animals in the UK. There are a number of goods traded within the Partnership that will no longer be subject to import tariffs to the UK. This is extremely concerning from an animal health and welfare perspective. Tariffs on eggs and egg products, a proportion of which are produced from battery cage farmed hens, will be phased out over the next 10 years. The UK has also agreed to importation quotas for beef and pork from the CPTPP. In some countries within the Partnership this is produced under conditions that would not be accepted in UK domestic production. For example, in the UK there are requirements placed upon farmers and industry for rearing animals which include space allowances in enclosures made for pregnant sows and legislation that mandates that calves are always provided with bedding. According to the Animal Protection Index, Mexico, Japan, Peru, Vietnam and Malaysia, all members of the CPTPP, do not have specific legislation in place for the rearing of hens, cattle, and pigs.¹
- 5) There are significant differences in how the UK and some of the countries in the CPTPP use antibiotics in farm animals. The UK is one of the lowest users of antibiotics in Europe, and lower than any EU country with a significant livestock farming industry. Importation of products of animal origin from countries in the CPTPP with higher usage of antibiotics increases the likelihood of importing antimicrobial resistant (AMR) bacteria. This presents a challenge to both public health and animal health in the UK.

Animal welfare standards for imported goods

- 6) Along with the British Veterinary Poultry Association (BVPA) we wrote to the Secretary of State for Business and Trade following the announcement of the UK accession to the CPTPP on 16 July 2023. Under the terms of the deal, import tariffs on eggs and egg products will be phased out over a 10-year period. This means eggs could be imported from countries employing battery cage systems. Raising hens in conventional battery cages have been illegal in the UK since 2012. The prospect of the UK public unknowingly consuming eggs from hens living in such conditions is troubling and poses a significant threat to the leading animal welfare standards that the UK has gained recognition for. Under the British Lion

¹ <https://api.worldanimalprotection.org/>

Code of Practice, British egg producers operate to world-leading standards of animal welfare. In addition to undercutting our egg producers, such imports would also send a concerning message that the UK will not negotiate for high animal health and welfare standards on the global stage.

- 7) This issue has further implications for products that contain eggs. The argument can be made that if eggs are sold in the UK from these countries then this can be displayed on the packaging so consumers are able to make informed choices. However in the case of egg products and products that contain eggs, this becomes much harder. It is vital that the Government introduces improved welfare labelling on products to enable consumers to have a more active choice. Defra, in its own call for evidence in 2021, found there was public appetite for improved welfare labelling but did not consider the time right to consult on proposals to reform labelling for animal welfare. This is worrying to see as the UK public want to be more informed about their food choices at a time when the country is opening up its markets to more international goods raised and manufactured under significantly different conditions than the home market. We believe it is very important that consumers are given clear information about the origins and welfare standards of the animal produce they purchase, and it is alarming that Defra is not pursuing this work on labelling at this crucial time.
- 8) In signing up to the CPTPP deal the UK has agreed to import 13,000 tonnes of beef per year starting ten years after the deal has been ratified. This is concerning, given that many countries in the Partnership raise cattle in management systems that would be unacceptable in the UK. For example, Canada uses growth hormones such as testosterone propionate, progesterone and trenbolone acetate in cattle production which are banned for use in cattle rearing in the UK. It is concerning that the UK could soon be importing beef raised under conditions we would not accept in this country. This is just another example of a trade deal that has been signed which offers countries access to the British home market who do not place as much value on animal health and welfare as the UK.
- 9) In the recently negotiated FTA with Australia, the UK Government consented to tariff-free access on beef products beginning at 35,000 tonnes per year rising in instalments to 110,000 tonnes over the next 10 years. Australia has beef production methods that are not acceptable in the UK due to animal welfare concerns. For example, a proportion of Australian cattle rearing is carried out on non-grazing feedlots which limits space and the ability of animals to carry out their natural behaviours. This practice is not allowed in the UK. Whilst trade deals are clearly vital to the UK economy, they should never come at the expense of the quality of food we serve on our plates, or the higher quality of life provided by UK producers for those animals involved in food production.
- 10) Similarly, in signing up to the CPTPP, the UK has agreed to quotas for importing pork starting at 10,000 tonnes per year and increasing to 55,000 by year 10 of the agreement. Once again we see the UK market opened to animal produce that is kept in conditions we would not accept in this country. Several countries within the Partnership use sow stalls, which confine a sow to a small and bare metal cage where she cannot turn around for the whole of the 16-week pregnancy. This deprives her of chances to explore, exercise and socialise and has been banned in the UK since 1999.
- 11) It is not clear whether the cumulative impact of the recently negotiated trade deals and any subsequent deals is being factored into trade negotiations. We fear that offering tariff-free access, for animal produce such as eggs and beef, to countries with lower animal welfare standards than the UK will erode so many of the hard-fought animal welfare gains that the UK has achieved. If the UK Government proceeds with its current negotiating style we could see deal after deal being signed that undermines our own high standards. A clear and consistent stance in maintaining the UK's animal welfare standards must be a key pillar in all trade agreements going forward.

Sanitary and phytosanitary (SPS) measures

- 12) 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. They serve a vital purpose: ensuring the maintenance of public and animal health through effective disease surveillance and control. The consequences of failing to do this could be catastrophic to multiple sectors of the UK's economy.
- 13) Certain countries within the CPTPP use significantly more antibiotics in farm animal production than the UK. This often correlates with animals being kept in worse living conditions with more animals crammed into less space with the resulting disease from these intensive conditions leading to increased antibiotic use². Certain countries within the CPTPP use antimicrobials for growth promotion, which was banned in the UK in 2006. This is cause for concern for two reasons. Similar to the tariff-free access offered on eggs

² <https://www.saveourantibiotics.org/the-issue/antibiotic-overuse-in-livestock-farming/>

and the beef and pork import allowances, this does not send a positive message that the UK is willing to standby established higher standards. The second and more worrying implication of this deal is it raises the likelihood of the transmission of AMR bacteria in the food we import from these countries. The high levels of AMR we see today are a result, in part, of the overuse and misuse of antibiotics in humans, animals and plants. The UK use of antibiotics in farmed animals is one of the lowest compared with members of the EU. This is significant given the EU ban on the routine use of antibiotics in livestock which came into force in January 2022. Preventative use has also been restricted to exceptional treatments of individual animals meaning that antibiotics can no longer be applied to compensate for poor hygiene and animal husbandry practices. It is alarming to consider the possibility that all the hard work the UK puts into the biosecurity of animal production could be under threat by the overuse of antibiotics within the CPTPP.

- 14) It is not clear whether the UK intends to use its influence, now it is part of the CPTPP, to reduce the use of antibiotics in farm animals across the Partnership. The signs are not encouraging given Japan, the CPTPP's first precedent-setting applicant, was insistent that the UK accept virtually all existing CPTPP rules for entry into the Partnership.³ Canada has already put pressure on the UK to open its home market to Canadian beef despite the significant differences in cattle rearing practices between the two nations.

Future Trade Deals

- 15) We have provided responses to calls for evidence and consultations on trade negotiations between the UK and a number of other countries and trading blocs. Some of these include South Korea, Australia, New Zealand, the CPTPP and Japan. For each of these responses we have expressed our concern over the lack of consistency when it comes to negotiating and for consideration to be given to animal welfare in trade. The UK has worked hard to achieve international recognition for animal welfare standards. Negotiating trade deals offers a great opportunity for the UK Government to use this reputation to push for higher standards from the countries it chooses to do business with.
- 16) The original Trade and Agriculture Commission (TAC) published its report in March 2020. Key amongst their recommendations was recommendation 8 which stated that:

“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.”

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

- 18) As a matter of urgency, and before initiating further FTA negotiations, the UK Government should adopt

³ <https://www.csis.org/analysis/united-kingdom-joining-cptpp-what-comes-next>

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 and this will need a system requiring checks and continuous monitoring to ensure standards are maintained over time.

- 19) To reiterate, it is our view that FTAs should commit all parties to promote cooperation on welfare standards and be supportive of future research on animal welfare standards. Trading partners should also promote and maintain food safety standards to the level of the country with the higher standards, it should be an ongoing conversation between both countries on how they can better support animal welfare and food safety standards in food production and trade.