

BVA submission to the House of Lords EU International Agreements Sub-Committee: UK-Japan 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 have consulted with specialist divisions the Fish Veterinary Society (FVS), Pig Veterinary Society (PVS), the Goat Veterinary Society (GVS), the Sheep Veterinary Society (SVS), the British Cattle Veterinary Association (BCVA), the Veterinary Public Health Association (VPHA), the British Veterinary Poultry Association (BVPA), and our Branches in the devolved regions.
- 3) We welcome the opportunity to provide evidence in relation to ongoing UK-Japan trade negotiations, recognising that agreeing a comprehensive free trade agreement with Japan is a priority for the UK as we approach the end of the transition period and lose the benefits of the EU-Japan Economic Partnership Agreement.
- 4) Securing a new trade deal with Japan with reduced tariff barriers and the simplification of Sanitary and Phytosanitary (SPS) checks offers an opportunity for the export of UK products of animal origin (POAO).
- 5) 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

- 6) 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 Japan. 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.
- 7) 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. However, we have written to the Secretary

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

of State to raise serious concerns over the balance of expertise on the Commission, pointing to the fact that only one member of the 16-strong group is a veterinary surgeon. We have asked for a reconsideration of the decision not to include a representative from BVA who can bring forward the views, experiences, and expertise of the whole UK veterinary profession.

- 8) 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. In a recent survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of animals.
- 9) As the UK takes control of its trade policy, it should be assertive in spreading animal welfare norms via trade agreements. Therefore, a free trade agreement with Japan must have an ambitious and comprehensive animal welfare chapter, including detailed provisions on animal welfare cooperation.

Areas of concern

- 10) We are extremely concerned that current production systems in Japan fail to meet UK standards, with significant divergence in the field of animal welfare. The [Animal Protection Index](#) gives the UK a rating of B for overall animal welfare and government accountability, where Japan holds E and F grades respectively. 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, Japan has incorporated only some elements of the OIE's animal welfare standards and principles into legislation, in particular into the provisions of the Act on Welfare and Management of Animals 1973. However, relevant legislation does not currently contain provisions on transporting animals by air, land or sea, or on killing of animals for disease control².
- 11) Other than being listed in the category of "protected animals" giving rise to criminal offences for cruel treatment under Article 44 of the Act on Welfare and Management of Animals (1973), there is no content in the Act to specifically address the welfare needs of animals used in farming. There is also no policy or legislation related specifically to the rearing of pigs, broiler chickens, egg-laying hens, or dairy cattle and calves. The Standards relating to the Care and Keeping of Industrial Animals (1987) does not give any concrete instruction and there is no formal inspection or enforcement system to check whether farmers follow the guidelines. The Standards relating to the Methods of Destruction of Animals (1995) are also vague in their prevention of unnecessary pain and suffering before and during animal slaughter. World Animal Protection has urged the Government of Japan to mandate the humane slaughter of all farm animals³.
- 12) We also have some concerns regarding the effectiveness of disease control programmes in Japan, in particular in relation to Classical Swine Fever which Japan has been struggling with for several years⁴. The UK is a net importer of pig meat, currently importing around 60 per cent of all the pork it consumes⁵. Although the EU currently supplies virtually all the pork imported into

² <https://api.worldanimalprotection.org/country/japan>

³ Ibid

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https://www.oie.int/wahis_2/public/wahid.php/Reviewreport/Review?page_refer=MapFullEventReport&reportid=33099

⁵ <https://britishmeatindustry.org/industry/imports-exports/pigmeat/>

the UK, due to the high import tariffs on pork from elsewhere, if this were to change as a result of new trade deals, approaches to disease control must be a key consideration.

- 13) 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. The consumer confidence such assurance schemes attract must not be undermined by imports from systems where standards are lower than the UK⁶.
- 14) 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 farm animal welfare standards in all trade agreements it negotiates.
- 15) 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 demonstrating region of origin (eg Scottish salmon). Although mackerel accounts for the UK's largest seafood export to Japan by volume, Atlantic salmon is the product with highest export value - 649 million yen in 2018⁷. The UK's reputation for farming Atlantic Salmon with high health and welfare standards is key to growing the export market with Japan, where the appearance of the product, including fat content, flesh colour, and visual quality of the scales is important. These factors are contingent on high health and welfare standards during production, including feed type, control of sea lice, and slaughter processes. Scotland has a world-renowned food and drinks sector, and Atlantic salmon represents a growth market as the UK takes control of its trade policy.

Antimicrobial resistance

- 16) 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 of the O'Neill Review on Antimicrobial Resistance, the UK agricultural and food industry has taken steps to further 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. In 2018 the RUMA Targets Taskforce reported that no Highest Priority Critically Important Antimicrobials had been used in the British trout or Scottish salmon farming sectors in 2017, and sensitivity testing remains standard practice⁸.

⁶ <https://www.bva.co.uk/take-action/our-policies/farm-assurance-schemes/>

⁷ https://www.seafish.org/media/1553586094-Japan_Export_Guide.pdf

⁸ <https://www.ruma.org.uk/wp-content/uploads/2018/11/RUMA-TTF-1-year-on-Full-Report-FINAL.pdf>

17) The Government of Japan, in its National Action Plan on Antimicrobial Resistance 2016-2020 committed to strengthening surveillance and monitoring in the fields of veterinary medicines, livestock production, and aquaculture⁹. The growing interest in AMR in Japan represents a further opportunity for the UK to market high-quality produce where reduced use of antibiotics can be demonstrated, particularly in aquaculture, where biological control of sea lice through cleaner fish is almost unique globally.

Sanitary and Phytosanitary (SPS) measures

18) Allowing goods onto the UK market which fail to meet our current standards of animal health, animal welfare and public health will increase the need for Sanitary and Phytosanitary (SPS) checks, as within the UK these goods will become indistinguishable from UK produce. This has the potential to jeopardise the ability of exporters in the UK with the EU due to the increased risk that goods leaving the UK fail to meet EU SPS standards. The need for risk-based checks on UK goods entering the EU Single Market would increase, placing an additional administrative burden on UK producers and increase the potential for delays.

19) 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.

20) 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.

21) The UK Government should seek to apply a minimum animal health and welfare standard to the production of animal products imported directly for consumption by UK consumers or as material destined for re-export, potentially onto the EU market. A minimum 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 and welfare, and ensure consumer confidence at home and abroad.

22) The EU-Japan Economic Partnership Agreement deal includes an SPS chapter which seeks to simplify the Sanitary and Phytosanitary processes on trade between the two markets. A similar agreement would maintain these benefits for UK agriculture and aquaculture, which export to Japan.

Conclusion

23) A trade deal with Japan presents a number of opportunities:

- Securing the benefits of the EU-Japan Economic Partnership Agreement.
- Enabling exports of UK high animal health and welfare food by a reduction in tariffs

⁹ <https://www.mhlw.go.jp/file/06-Seisakujouhou-10900000-Kenkoukyoku/0000138942.pdf>

- 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.

24) However, the UK must safeguard its reputation for animal health, animal welfare, and food safety, and 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 and food safety and responsible antibiotic use.