

BVA views to help shape the Trade and Agriculture Commission report on the UK's future trade policies

Who we are

- 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, animal welfare, public health, regulatory issues and employment matters.
- 2) Veterinary surgeons deploy their expertise across domestic food production, from farm to fork, ensuring UK production meets high standards of animal health, animal welfare and food safety, and providing assurance to trading partners. The veterinary profession has a great deal of expertise that can contribute to the development of the UK's future trade policies and help secure opportunities for the UK economy.
- 3) We welcome the opportunity to provide our views to help shape the Trade and Agriculture Commission report on the UK's future trade policies.

How could we address trade barriers to improve UK business competitiveness?

- 4) Imports of both animals and animal products may carry pathogens that can represent a threat to UK public health and the health of animal populations. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or contaminants. 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.
- 5) The great majority of new free trade agreements (FTAs) now contain provisions seeking to reduce friction caused by sanitary and phytosanitary (SPS) trade barriers. SPS issues have often taken centre stage 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).
- 6) Whilst upholding high standards of animal health, welfare and public health, UK trade policy should endeavour to cooperate with trade partners on SPS processes to simplify procedures and remove access barriers for UK producers. This could be through veterinary equivalence agreements which can be part of a comprehensive FTA or be standalone.
- 7) There are also continuing opportunities outside of formal trade negotiations that can open export markets or simplify SPS requirements. A recent example was the USA granting market access for UK beef in March 2020.¹ This followed the USA's longstanding ban on EU beef, introduced in the wake of the BSE outbreak in 1996. The UK's standards of animal health, animal welfare and food safety were critical to allowing this to happen and are important for addressing trade barriers and improving market access for UK businesses. The US Food Safety and Inspection Service (FSIS) Audit Report was published in March 2020 and confirmed that UK meat hygiene systems and controls met the standards necessary for products to be

¹ <https://www.gov.uk/government/news/first-exports-of-uk-beef-to-the-usa-in-20-years-underway>

exported to the USA.

- 8) This example highlights that addressing barriers to trade is often technical and requires professional knowledge, hence the importance of veterinary surgeons within the trade sphere. 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. As veterinary surgeons deploy their expertise from farm to fork, ensuring UK production meets high standards of animal health, animal welfare and food safety, they are able to provide an unparalleled level of assurance to trading partners
- 9) 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. Similarly, the EU has the Market Access Database which lists SPS issues for trading nations. Outside of the EU, this process should help identify issues for UK exporters that reflect our specific health status and mix of production systems.

Why is an appropriately trained veterinary workforce so important?

- 10) Vets work to both certify and supervise the import and export of animals and animal products. The vital role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised around the world. In order to meet the opportunities afforded by international trade, the UK will require a veterinary workforce with the capability and capacity necessary to facilitate international trade both with the EU and other trade partners. 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 have a substantial impact on the farming and food sectors.
- 11) Should the SPS regime between the UK and trade partners be unduly complex, it would place additional burdens on import and export certification provided by the UK veterinary workforce. There is a risk that this could become a barrier to trade.
- 12) From January 2021, exporters will require an export health certificate (EHC) signed by an OV to transport animals, products of animal origin or germplasm from Great Britain to the EU Single Market and Northern Ireland. 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.

How could UK trade policy best advance the UK's agriculture and food interests? What outcomes would you seek?

- 13) Developing a new UK trade policy presents opportunities for the UK agriculture and food sectors. A reduction in tariff barriers and simplification of SPS requirements could present an opportunity for the export of products of animal origin (POAO). However, we firmly believe this opportunity should only be taken with significant farm to fork guarantees on animal health, animal welfare and public health.
- 14) The top priority must be to safeguard the UK's reputation for animal health, animal welfare, and food safety, and to do that, it is essential that these standards are upheld in trade negotiations. UK consumers expect and value these standards. Allowing products onto the UK market which do not conform to our high animal health and welfare standards risks undermining 'Brand

Britain' and has 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 medicines use.

- 15) We welcomed the early pronouncements from the UK Government that it would seek to establish the UK's "unique selling point" as one of high animal welfare and high food safety standards.² The current Chancellor of the Duchy of Lancaster noted in his previous role as Secretary of State for Environment, Food and Rural Affairs:

"[P]eople know that high animal welfare standards and high environmental standards reinforce the marketability of our produce. It would, therefore, be a mistake if in any free trade deal we watered down those standards. We want free trade deals, but we should not tarnish the good name of free trade by associating it with any diminution in those standards."³

- 16) 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 Policy.⁴ 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.
- 17) However, it is important to recognise that the UK's ability to design a new domestic agriculture policy offers an opportunity to bolster trade strategy. Already, the new Animal Health and Welfare Pathway is designing interventions under the Agriculture Bill in England. The Pathway is seeking to ensure vets and farmers work together to improve animal health and welfare outcomes on farm. This will improve the UK's reputation for producing food to a high standard, which is the key to the marketability of our produce. A key objective of the Pathway is to capture better data to provide evidence to underscore the UK's high reputation for animal health and welfare and open further export markets. At the same time the new ELM scheme will provide farmers with an opportunity to secure financial reward in return for delivering environmental benefits, which will further underscore the reputation of UK produce.
- 18) 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 requires 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.

How could we balance protection of consumer and business interests, whilst also offering consumers greater choice, availability and affordability?

- 19) It is fair to consider the balance between the interests of consumers and businesses. However, it would be inappropriate to compromise public health, animal health and animal welfare within a balancing exercise between business interests and consumer choice.

² Former Environment Secretary, Andrea Leadsom MP, speaking at NFU conference 2017, reported Farming UK <https://www.farminguk.com/news/UK-s-poorest-families-will-gain-from-Brexit-due-tocheaper-food-imports-report-says_47334.html>

³ Michael Gove MP, Secretary of State for Environment, Food and Rural Affairs noted this giving evidence to the House of Lords Select Committee on the European Union Energy and Environment Sub-Committee

⁴ <https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brexit-agricultural-support.pdf>

- 20) Many surveys indicate that UK citizens wish to see improvement in the welfare of farmed animals.⁵ In a 2010 survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of animals.⁶
- 21) According to a Which? survey of UK consumers, the vast majority of the UK public are against lower quality food being imported into the UK, even if it means a reduction in cost.⁷ 72% of respondents surveyed did not think food from countries with lower standards should be on sale in the UK. 79% would be uncomfortable eating beef produced with growth hormones, and 72% would be uncomfortable eating chlorine-treated chicken. Overall, 72% think food from countries with lower standards shouldn't be available at all. The survey found people from lower socio-economic backgrounds, those who in theory would benefit most from greater affordability, were less likely than those from higher socio-economic households to believe food produced to lower standards should be available in the UK.
- 22) The British public have an expectation of high standards, and evidence would suggest they consider this a priority for trade policy. Furthermore, prioritising lower food costs within trade policy fails to recognise, that within the UK, food is more affordable than ever.⁸ The average British family spend on food and drink has fallen from 30% in the 1950s to less than 10% today.⁹ In fact, in the UK, food costs as a proportion of household income are amongst the lowest in the world, behind only the United States and Singapore.¹⁰

How could we ensure that animal welfare and environmental priorities are integral to our trade policy?

- 23) 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 ensuring the welfare of farmed animals. In a survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of animals.¹¹ Recognising the sentience of animals in law is an international marker of the significance of animal welfare and should be enshrined in UK law as a priority.
- 24) High animal welfare standards and high environmental standards reinforce the marketability of our produce. 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.
- 25) As the UK takes control of its trade policy, it should be assertive in spreading animal welfare norms via trade agreements. The UK and New Zealand are largely aligned on animal health and welfare policy, and an early trade deal with New Zealand offers an excellent opportunity to reinforce the importance of animal welfare. We believe a free trade agreement between the UK

⁵ Eurobarometer. 2007. Attitudes of EU citizens towards animal welfare. Special Eurobarometer 270. http://ec.europa.eu/public_opinion/archives/ebs/ebs_270_en.pdf

⁶ Kehlbacher, A. 2010. Willingness to pay for animal welfare in livestock production. PhD Thesis. University of Reading, UK.

⁷ <https://www.which.co.uk/news/2020/06/why-labels-wont-protect-uk-food-standards-from-a-us-trade-deal/>

⁸ <https://www.which.co.uk/news/2019/11/heres-how-our-food-prices-compare-to-30-years-ago-and-you-might-be-surprised/>

⁹ <https://www.nfuonline.com/news/latest-news/blog-headlines-over-food-prices-demonstrate-need-for-resilient-farming-sector/>

¹⁰ <https://www.bbc.co.uk/news/business-45559594>

¹¹ Kehlbacher, A. 2010. Willingness to pay for animal welfare in livestock production. PhD Thesis. University of Reading, UK.

and New Zealand should include an ambitious and comprehensive animal welfare chapter, including detailed provisions on animal welfare cooperation.

- 26) The UK Government has demonstrated strong leadership at home and globally in tackling the issue of antimicrobial resistance, which presents a significant worldwide threat to both human and animal health. Thanks to these efforts, action has been taken at all levels, including at the United Nations, within the EU and domestically. This growing international concern represents a further opportunity for the UK to market high-quality produce where responsible medicine use can be demonstrated, particularly in aquaculture, where biological control of sea lice through cleaner fish is almost unique globally.
- 27) Encouraged by the publication of the O'Neill Review on Antimicrobial Resistance¹², 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.
- 28) Responding to the O'Neill review, industry made a commitment to reduce antibiotic use in livestock and farmed fish to 50 mg/kg by 2018. This target was achieved two years early. The release in October 2019 of the most recent Veterinary Antimicrobial Resistance and Sales Surveillance (VARSS) report shows continued progress:¹³
- The UK is now the lowest user of antibiotics when compared to EU countries with significant livestock farming and the 5th lowest user overall.
 - For the third year running, the lowest level of sales of veterinary antibiotics in the UK (226 tonnes) was recorded since regular recording began in 1993.
 - Total sales of veterinary antibiotics, adjusted for animal populations, was 29.5 mg/kg in 2018.
 - This result signals an additional 9% reduction from 2017 and a 49% reduction since 2014.
 - Sales of the highest priority critically important antibiotics (HP-CIAs) have dropped 68% since 2014.

How could we advance global agri-food standards, and what can we learn from other countries?

- 29) Above, we note the opportunities offers through trade negotiations to advance animal health, animal welfare and public health standards. Bilateral trade deals present a number of opportunities to advance standards as well as open up new opportunities for the UK agricultural industry.
- 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 ambitious and comprehensive animal welfare chapters.
 - Cooperating with trade partners to simplify SPS processes and remove access barriers for UK producers.
- 30) These opportunities should only be taken with significant guarantees on public health, animal health and animal welfare.

¹² <https://amr-review.org/>

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909987/_1587146-v23-VARSS_2018_Report__2019_-accessible.pdf

- 31) UK has already begun to represent itself in the WTO since leaving the EU on 31 January 2020. At the end of the transition period, the UK will begin to operate under its own WTO schedules. The UK should use its newly restored position within the WTO system to champion animal health, public health and significantly animal welfare concerns, which the UK public see as a moral obligation.¹⁴
- 32) The WTO, since it was established in 1995, has incorporated and set up over 20 different agreements into its rules. The most relevant for animal welfare are the General Agreement on Tariffs and Trade (GATT '47), the Agreement on Technical Barriers to Trade (TBT), the Agreement on Applying Sanitary and Phytosanitary Measures (SPS) and the Agreement on Agriculture (AoA). Through these rules, the WTO encourages the harmonisation of national measures with relevant international standards to facilitate safe trade.
- 33) The broad objective of the World Organisation for Animal Health (OIE) is to promote global improvements in animal health, animal welfare, and veterinary public health. To this end, the OIE sets intergovernmental standards and works to strengthen the capacities of Members to implement them. The OIE standards are recognised as WTO references with respect to animal health and zoonotic diseases, and a significant number of WTO disputes have addressed the relevance of these OIE standards to international trade measures. In addition to animal health standards, the OIE also sets standards for animal welfare, and has implemented regional and global strategies to encourage their adoption by Members. In comparison with measures to protect animal health or food safety, few WTO disputes have considered animal welfare related measures. A lack of WTO case law has contributed to uncertainty about the consistency of WTO animal welfare measures. The UK should seek to work closely with allies on this issue, including the EU, to push for a strengthening of animal welfare protections within the WTO.
- 34) A new role at the WTO offers the UK Government a new arena to demonstrate our strong leadership on the issue of antimicrobial resistance. Thanks to the UK Government's efforts, action has already been taken at all levels, including at the United Nations, within the EU and domestically. AMR is a significant global concern. It was discussed at both the G20 Summit, which took place at Hangzhou, China, on 4-5 September 2016, and ahead of a UN meeting on 21 September 2016, where all 193-member states signed a declaration to combat the proliferation of antibiotic resistance.

¹⁴ Kehlbacher, A. 2010. Willingness to pay for animal welfare in livestock production. PhD Thesis. University of Reading, UK.