

BVA response to Independent Strategic Review of NI Agri-Food

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 and welfare, public health, regulatory issues and employment matters.
2. The BVA's Northern Ireland Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Northern Ireland. The Branch advises BVA on the consensus view of the Northern Ireland members on local and United Kingdom issues.
3. We welcome the opportunity to respond to this Independent Strategic Review of the NI Agri-Food Sector (ISRAF).

The role of veterinary surgeons

4. The veterinary profession is an integral part of the agricultural and food sectors. Veterinary surgeons, working collaboratively with others, protect animals, people and the environment they share. Veterinary surgeons provide preventive healthcare and treatment for livestock, as well as carry out surveillance, promote good biosecurity, promote high animal health and welfare, undertake research and development, and optimise food productivity and sustainability.
5. By carrying out surveillance and enforcement from farm to-fork, Authorised Veterinary Inspectors (AVIs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the Northern Ireland agri-food sector is therefore of great interest and importance to the veterinary profession.
6. As an evidence-based, scientific profession, the veterinary voice is also valued by both producers and consumers as an 'honest-broker' of information about animal-derived food. Vets are therefore well-placed to advise and influence discussions informing the future of how we produce, consume and market our food; from safeguarding animal health and welfare, to ensuring consumers are able to make informed choices about their food purchases, whilst at the same time facilitating production efficiency and environmental protection.

The unique story the Northern Ireland agri-food sector can tell.

7. The veterinary profession in Northern Ireland plays a key role in the agri-food sector. Our vision would see animal health, animal welfare and public health at the centre of the unique story of the Northern Ireland agri-food sector. We want to see a strong, competitive, and innovative agri-food industry which enjoys the confidence of customers at home and abroad.
8. The relationship between a farmer and their vet is paramount when it comes to any effort improve animal health and welfare outcomes. A new agricultural policy offers an opportunity to harness the power of this relationship and empower farmers and vets to collaborate to see positive outcomes on farm.

Productivity of the sector.

9. BVA recognises the specific context of farming in Northern Ireland. Of the four constituent parts of the UK, Northern Ireland is most reliant on agriculture in terms of the share of Gross Value Added (GVA) and percentage share of total employment. Conversely, however, Northern Ireland also has the smallest average farm size within the UK. Northern Ireland farmers are more dependent on direct payments than

their counterparts elsewhere in the UK. It has been estimated that EU subsidies make up between 50 and 60 per cent of farm income in the UK.¹ However, this provides 83 per cent of total farming income in Northern Ireland.² Therefore, a focus on productivity will be important for the future of Northern Ireland agriculture.

10. The veterinary profession plays a pivotal role in increasing productivity while ensuring animal health and welfare needs are met. We support the definition of productivity used within the legislation which emphasises quality and efficiency in production.
11. The productivity of farm businesses is linked to the health and welfare of livestock. It is important to recognise that fewer healthier and happier animals with better productivity have less of an impact at all levels compared to numerous animals with poorer health and welfare outcomes. Considering sustainable consumption and production together can therefore have a positive impact on animal welfare and provide an opportunity to drive consumer demand for high animal welfare products.
12. Support for productivity should be linked to health and welfare outcomes and designed to support improvements in standards. Improved animal health outcomes benefits productivity through efficiency. Improved health status, biosecurity and husbandry will also reduce disease risk leading a more financially resilient sector.
13. Disease outbreaks and the measures to control them can carry wide and costly consequences for public health, the economy and the environment. These impacts are substantial; across the UK, the Foot and Mouth outbreak in 2001 is 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 and caused a general election to be postponed³.
14. The costs associated with endemic disease such as bovine TB is also large. Compensation and testing costs in the current Northern Ireland bTB programme reached almost £40 million in 2017/18.⁴ The benefits attached with achieving disease freedom are also significant in terms of animal health, welfare, productivity and access to foreign markets. There is a potential wider benefit for human welfare, with a recognised impact on the mental health and well-being of farmers.^{5,6}
15. The continuous monitoring of new and emerging disease through data collection, analysis and sharing across species provides high-quality intelligence on animal health and welfare that enables policy makers, veterinary professionals and animal keepers to take decisions to improve animal health and welfare and therefore productivity. A robust surveillance system is integral to the realisation of the high value outputs of Northern Ireland's £1 billion plus export-reliant livestock industry.
16. BVA has produced a detailed policy position on veterinary scanning surveillance which outlines our vision for animal health and disease monitoring post Brexit⁷. The development of a new agriculture policy

¹ House of Commons Library, EU Referendum: Impact on UK Agriculture Policy, 2016

² [https://www.daera-](https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/NI%20Future%20Agricultural%20Policy%20Framework%20-%20Stakeholder%20Engagement%20-%20FINAL_0.pdf)

[ni.gov.uk/sites/default/files/consultations/daera/NI%20Future%20Agricultural%20Policy%20Framework%20-%20Stakeholder%20Engagement%20-%20FINAL_0.pdf](https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/NI%20Future%20Agricultural%20Policy%20Framework%20-%20Stakeholder%20Engagement%20-%20FINAL_0.pdf)

³ National Audit Office (2002), The 2001 Outbreak of Foot and Mouth Disease

⁴ DAERA, (2017) Consultation on the Department's Response to the TB Strategic Partnership Group's Recommendations to Eradicate Bovine Tuberculosis (bTB) in Northern Ireland,

⁵ Crimes D, Enticott G. Assessing the Social and Psychological Impacts of Endemic Animal Disease Amongst

Farmers. *Frontiers in veterinary science*. 2019;6:342. doi: 10.3389/fvets.2019.00342, Bartram DJ, Yadegarfar G,

⁶ Baldwin DS. A cross-sectional study of mental health and well-being and their associations in the UK veterinary profession. *Social psychiatry and psychiatric epidemiology*. 2009 Dec 1;44(12):1075. doi: 10.1007/s00127-009-0030-8

⁷ British Veterinary Association (2018), Position on veterinary scanning surveillance (animal health and disease

presents an opportunity to modernise and optimise our animal health and disease monitoring networks which will be important as the UK loses access to EU disease surveillance systems. This can be achieved through:

- Maintaining the current level of Government resource spent on the scanning surveillance network
- Adopting new approaches to data collection and feedback
- Optimising appropriate skills and expertise
- Rethinking traditional approaches to funding and coordination
- Articulating the value of surveillance reporting to the veterinary profession and other stakeholders through education to increase awareness and participation
- Working collaboratively with stakeholders to explore innovative communication strategies
- The establishment of a body to oversee and co-ordinate surveillance policy across the four administrations of the UK.

17. Good animal health and welfare is paramount from farm-to-fork. Therefore, agricultural policy should support animal health and welfare which underpins the reputation of Northern Ireland's agricultural exports. This reputation allows Northern Ireland farmers to add value to produce by marketing to discerning, value-added markets.

Market opportunities at home and abroad.

18. 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.⁸ 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."⁹

19. We called on the UK 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.¹⁰ This was successful and implemented in England through the Agriculture Act 2020. A similar opportunity is available for Northern Ireland, and we would ask that that opportunity be taken.

20. In England, the new Animal Health and Welfare Pathway is designing interventions under the Agriculture Bill. BVA has held a seat on the Pathway Steering Group, which is seeking to ensure vets and farmers work together to improve animal health and welfare outcomes on farm. This will improve England's reputation for producing food to a high standard, which is the key to the marketability of produce. A key objective of the Pathway is to capture better data to provide evidence to underscore the high reputation for animal health and welfare and open further export markets.

The case for "Northern Ireland" branding and a NI trade promotion/marketing body.

21. High animal welfare standards and high environmental standards reinforce the marketability of our produce. Northern Ireland should look to maximise opportunities to promote high-quality, high welfare produce to export markets, including those products which might benefit from labelling that demonstrates

monitoring)

⁸ 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-to-cheaper-food-imports-report-says_47334.html>

⁹ 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

¹⁰ <https://www.bva.co.uk/media/1179/bva-veterinary-vision-for-post-brexit-agricultural-support.pdf>

region of origin. This can help secure opportunities for Northern Ireland farmers and open up new export opportunities.

22. We strongly support encouraging the public sector to buy Northern Ireland produce and championing the high standards of agriculture, by procuring farm assured produce. Government Buying Standards should be amended to reflect this. In addition, we would also welcome a government-led education campaign, supported by agricultural, animal health and welfare, and food stakeholders, to encourage all consumers, both public sector services and individual consumers, to buy farm assured produce, and understand the positive animal health and welfare, and environmental, impacts of doing so.

Areas where you perceive there are market failures that are preventing the sustainable development of the sector and that may require direct government intervention.

23. The Government should utilise public money to incentivise and support animal health and welfare outcomes as public goods. Public goods by their very nature, are not market goods in the same way as livestock products such as meat or milk. Public goods have no explicit value in terms of market prices and so the market cannot efficiently allocate resources to them. Other means therefore must be used – such as the intervention of Government in the form of regulation or financial support.¹¹
24. Incorporating animal health and welfare outcomes must be done in a meaningful way. An outcomes approach should be utilised as a tool to drive continuous improvement of animal management and husbandry practices, thereby promoting high animal health and welfare. The standardised assessment of health and welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct examination. Delivering these public goods should be at the heart of a new post Brexit agricultural policy- benefiting producers, consumers and wider society.

Processing capacity in Northern Ireland.

25. A full assessment of abattoir provision that can be accessed by farms in Northern Ireland would be beneficial to understand the welfare of animals during transport, at slaughter, or on-farm were there to be barriers to accessing slaughter facilities in a timely fashion. The 2019 FAWC opinion on the welfare of animals during transport echoes this concern with the following recommendation:

“FAWC recommends that there is a review of the availability of abattoirs related to the points of production and particularly mindful of end of life requirement. This will identify where abattoirs need to be sited in order to meet the needs of farmers and to minimise journey times and thereby meet the welfare needs of animals.”¹²

26. It is important to recognise that the total number of abattoirs across the UK has declined.¹³The 2020 APGAW report into the Future for Small Abattoirs in the UK examined data on throughput in this context and found that while the number of total abattoirs in the UK has reduced, throughput has remained largely the same. This reflects the rationalisation of the slaughter industry and a shift towards a centralised processing model, where larger abattoirs serve specific retailers, producers or quality assurance schemes. In addition, anecdotally we have heard that improved legislative standards, and those from retailers and assurance bodies, including for welfare, have required slaughter premises to replace or update their

¹¹ Farm Animal Welfare Committee (FAWC), Economics and Farm Animal Welfare, 2011

¹² FAWC, 2019. Opinion on the welfare of animals during transport. Available at:

<https://gov.wales/sites/default/files/publications/2020-04/opinion-on-the-welfare-of-animals-in-transport-by-the-farm-animal-welfare-ommittee-fawc.pdf>

¹³ Sustainable Food Trust, 2018. A Good Life and a Good Death: Re-localising farm animal slaughter.

Available at: <https://sustainablefoodtrust.org/articles/a-good-life-and-a-good-death-re-localising-farm-animal-slaughter/>

equipment to comply with these standards. This has led to some smaller premises closing due to financial pressures.

High-throughput abattoirs

27. A shift towards this model of abattoir provision can increase journey lengths to slaughter as the number of abattoirs diminishes. Where current legal requirements derived from European Community Regulation 1/2005 and set out in the UK Welfare of Animals (Transport) Orders¹⁴ and Regulations^{15,16,17} are effectively applied and enforced, this in itself is not a welfare concern as evidence suggests transport conditions and fitness to travel are of greater importance than journey duration (time and distance) in terms of safeguarding the health and welfare of animals during transport.^{18,19,20,21}
28. In addition, larger, high-throughput abattoirs may present health and welfare advantages throughout the slaughter process. These advantages may include more defined roles and responsibilities for staff, standardisation of processes, up-to-date staff training, internal and external audit to meet retailer and quality assurance scheme requirements, suitable handling facilities, and additional resources to invest in new equipment and ongoing maintenance.
29. The Abattoir Sector Group has been formed following the recommendation by the All-Party Parliamentary Group for Animal Welfare's (APGAW) report into 'The Future for Small Abattoirs in the UK'.²² We await the work of this group which is chaired by former BVA President, and former President of BVA Northern Ireland Branch, Simon Doherty.

Low-throughput abattoirs

30. Low-throughput abattoirs, often situated locally to producers, can provide opportunities to slaughter animals as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances. In addition, in the case of single-species abattoirs, low-throughput abattoirs may provide purpose-built, species-specific facilities that promote good animal welfare. Importantly, small abattoirs receive a heavily discounted rate (up to 90%) on OV supervision to lead the delivery of official controls.²³ Some small abattoirs may also supply niche markets that require very high animal health and welfare standards. However, it is important to recognise that the available data suggests that there is variability in welfare outcomes in lower-throughput abattoirs.
31. Figure 1 forms part of a suite of FSA data stories, analysing level 3 (major) and 4 (critical) welfare non-compliances recorded from April 2017 to March 2019 shown per million animals slaughtered in specific slaughterhouse size groups.^{24,25} The data is from England and Wales, and therefore may not necessarily be extrapolated to Northern Ireland. The complete set of data stories includes animal welfare non-

¹⁴ [The Welfare of Animals \(Transport\) \(England\) Order 2006](#)

¹⁵ [The Welfare of Animals \(Transport\) \(Wales\) Order 2007](#)

¹⁶ [The Welfare of Animals \(Transport\) \(Scotland\) Regulations 2006](#)

¹⁷ [The Welfare of Animals \(Transport\) Regulations \(Northern Ireland\) 2006](#)

¹⁸ Cockram, M.S., 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science*, 106(4), pp.234-243.

¹⁹ Warriss, PD., Brown, SN., Knowles, TG., Kestin, SC., Edwards, JE., Dolan, SK., Phillips, AJ., 1995. Effects on cattle of transport by road for up to fifteen hours. *Veterinary Record*, 136, 319-323.

²⁰ Schwartzkopf-Genswein, K. and Grandin, T., 2014. 9 Cattle Transport by Road. *Livestock Handling and Transport: Theories and Applications*, p.143

²¹ Nielsen, B.L., Dybkjær, L. and Herskin, M.S., 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal*, 5(3), pp.415-427.

²² <https://apgaw.org/2020/06/07/apgaw-publishes-report-on-small-abattoirs/>

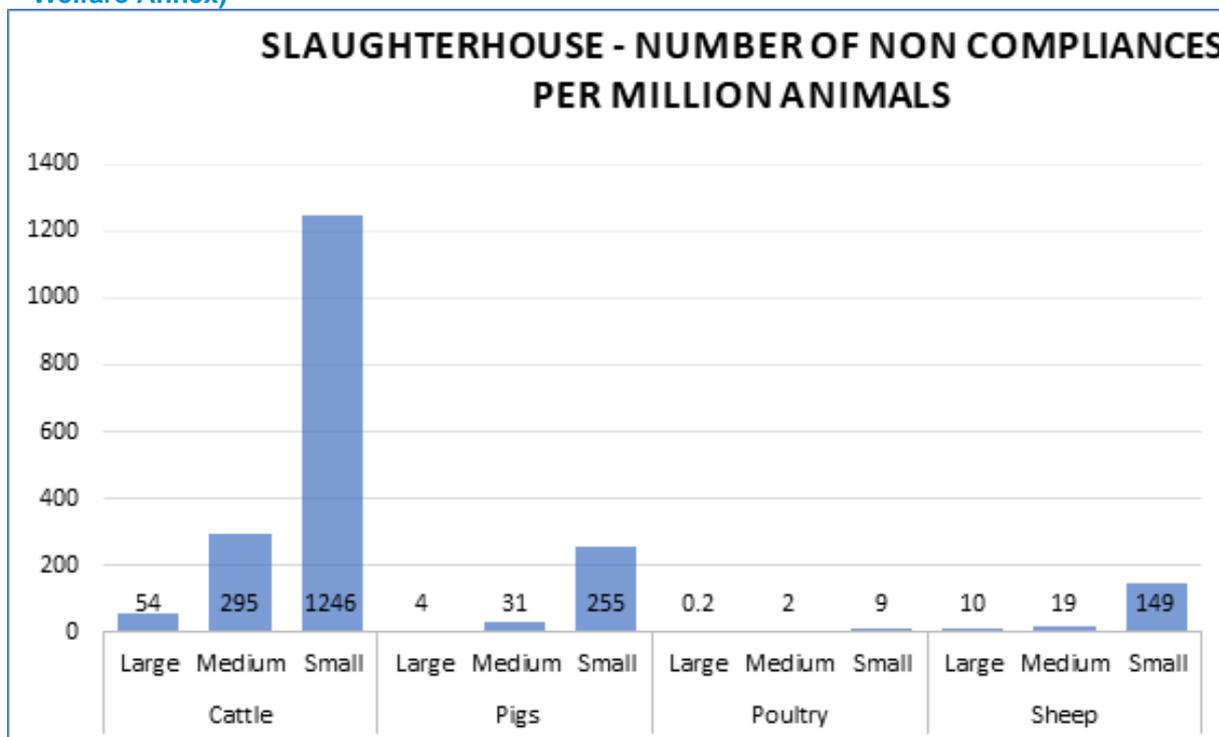
²³ <https://www.food.gov.uk/sites/default/files/media/document/ni-charges-guide-june-2020.pdf>

²⁴ Food Standards Agency (FSA), 2019. FSA Board Papers 19 September 2019, Animal Welfare Annex 8. Available at: <https://www.food.gov.uk/sites/default/files/media/document/fsa-19-09-20-annex-animal-welfare-final.pdf>

²⁵ Small: <1000 Livestock Units per year; Medium: 1000-5000 Livestock Units per year; Large: >5,000 Livestock Unit per year

compliances originating in slaughterhouses, transport and on-farm. It is important to note that during this time period the animal welfare-non-compliances arising in slaughterhouses were substantially lower than those arising on farm and in transport. 5.9% of all level 3 and 4 non-compliances originated in the slaughterhouse compare to 66.4% originating from transport and 27.6% on-farm.²⁶

Figure 1: FSA data on animal welfare non-compliances per one million animals in different slaughterhouse size groups (Extracted from FSA Board Papers 19 September 2019, Animal Welfare Annex)



32. The data shown in Figure 1 demonstrates that per one million animals there was a statistically significant difference in level 3 (major) and 4 (critical) animal welfare non-compliances in low-throughput abattoirs compared to that in premises with a greater throughput. However, it is important to recognise this data only shows the number of level 3 and 4 animal welfare non-compliances per one million animals and does not show the proportion of level 3 and level 4 non-compliances. While this is data provides a useful comparison in relative terms, abattoirs with a larger throughput will have slaughtered a greater total number of animals over the April 2017-March 2019 period, meaning that they may have a greater total number of animal welfare non-compliances than smaller abattoirs.

33. We would therefore welcome the opportunity to work with the UK Governments, and the food processing industry to develop a voluntary industry standard for low throughput abattoirs to ensure compliance with legislative requirements for animal health and welfare, and support Food Business Operators (FBOs) in their efforts to safeguard food hygiene, safety and animal health and welfare.

Mobile slaughter

34. As Northern Ireland will remain within the scope of the EU Single Market, it will be implementing new EU regulations. This brings with it a new opportunity to slaughter on farm ("mobile slaughter" rather than "mobile abattoirs" that might offer new opportunities for primary producers).

Mobile abattoirs

²⁶ See Annex 4 'Data stories: Analysis of welfare trends for major and critical non-compliances in England and Wales', page 2 of Food Standards Agency (FSA), 2019. FSA Board Papers 19 September 2019, Animal Welfare Annex 8. Available at: <https://www.food.gov.uk/sites/default/files/media/document/fsa-19-09-20-annex-animal-welfare-final.pdf>

35. We also recognise that mobile abattoirs can provide opportunities to slaughter animals as close to the point of production as possible, in turn reducing the need for animals to be transported over longer distances.²⁷ We are therefore supportive of exploring options to provide more opportunities for farm animal slaughter as close to the point of production as possible. We note the Scottish Government has recently commissioned a study to determine whether or not mobile abattoirs would be viable in Scotland.²⁸
36. Mobile abattoirs must comply with current legislative requirements for animal health and welfare at slaughter, biosecurity and waste disposal, food safety and hygiene checks, including ante- and post-mortem inspections performed by OV's. In addition, it is important there are safe lairage facilities, a potable supply of water, facilities for the disposal of animal by-products, as well as suitable facilities for the chilling, dressing and movement of carcasses.
37. However, any growth in mobile abattoirs to meet a potential increased demand for slaughter facilities should not represent a downgrading of animal health and welfare or public health standards. We can only support the use of mobile abattoirs where there is full compliance with current legislative requirements for processing and certification, and appropriate supervision from OV's.

Increasing levels of innovation and R&D.

38. To 'future-proof' our food system consideration should be given to the use of public funds to incentivize innovation, technology and new processes which can support animal health and welfare whilst optimising productivity and competitiveness.
39. The veterinary profession has considered the role of innovation in the Vet Futures report²⁹ and Action Plan³⁰. As a profession, vets take advantage of progress in scientific knowledge, innovation and technology to advance animal health and welfare, and challenge the status quo to drive continuous improvement. At the same time, we are alert to the impact of new technologies on animal health and welfare – and insist on robust ethical appraisal before new technologies are introduced.
40. The veterinary profession plays a pivotal role in driving innovation while ensuring animal health and welfare needs are met. Government should give priority to incentivising innovation, technology and new processes which can support animal health, animal welfare and public health whilst optimising productivity and competitiveness.
41. Veterinary researchers are addressing some of the biggest social and economic problems of today, including:
 - Inefficiencies in the food-chain;
 - National food security, ensuring that indigenous food industries are competitive;
 - Prevention of animal disease, zoonotic or otherwise;
 - Antimicrobial resistance;
 - Improving food animal welfare;
 - Climate change, as food-producing animals are one of the great contributors to - and are impacted by - global warming;
 - Conservation of wildlife;
 - Improving companion animal and equine health and welfare.

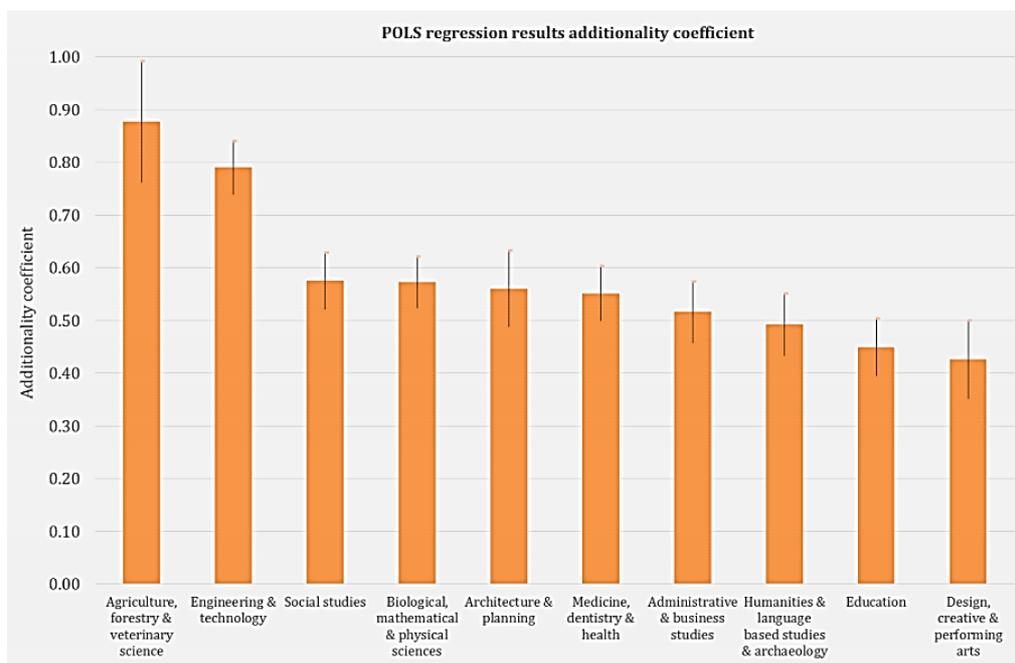
²⁷ Sustainable Food Trust, 2018. A Good Life and a Good Death: Re-localising farm animal slaughter. Available at: <https://sustainablefoodtrust.org/articles/a-good-life-and-a-good-death-re-localising-farm-animal-slaughter/>

²⁸ Scottish Government, 2019. CR/2018/40 - Assessing the viability and sustainability of mobile abattoirs in Scotland. Available at: https://www.publiccontractsscotland.gov.uk/search/show/search_view.aspx?ID=JAN341993

²⁹ <https://www.vetfutures.org.uk/resource/vet-futures-report/>

³⁰ <https://www.vetfutures.org.uk/resource/vet-futures-action-plan-2016-20/>

42. Epidemiology is central to the understanding of disease and how different interventions and controls affect these. The evidence provided by epidemiological research underpins the government policy, veterinary advice and industry action. Government should support innovative epidemiological research, to further our understanding of disease.
43. Investing in veterinary innovation makes economic sense. For example, it is estimated that the Bluetongue vaccination programme in 2008 has saved £460 million and 10,000 jobs in the UK, not to mention countless animal lives.³¹ A report commissioned by the Department for Business, Innovation and Skills (BIS) found that in 2012/13 research and development income for veterinary science totaled £55m. Agriculture, forestry and veterinary science research is singularly adept at leveraging public sector funding to attract additional private sector finance that otherwise would not have occurred,³² as can be seen in the below graph³³



44. A successful innovation strategy will encourage the sharing expertise from multiple disciplines to better understand the factors behind our most pressing problems and identify new opportunities. Research in the social sciences provides insight into decision making. The prominence of social science research within animal health policy design is growing. Greater application of social science concepts and findings should form a central aspect any agri-food strategy strategy.

Application of research

45. Equally as important as commissioning innovative research, is the dissemination of research and new learning from researchers into innovative practice on farm. Encouraging early adoption and a culture of evaluation will allow Northern Ireland to be a test-bed for new technologies. The role of the private vet will be essential to advise any farmer involved in early adoption, to collect data and ensure animal health and welfare are maintained.

³¹ RCVS Research Subcommittee 2013 *Veterinary research in the UK: a snapshot*, 2013

³² Department for Business, Innovation and Skills, *What is the relationship between public and private investment in R&D?* 2015

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/438763/bis-15-340-relationship-between-public-and-private-investment-in-R-D.pdf

³³ Department for Business, Innovation and Skills, *What is the relationship between public and private investment in R&D?* 2015, 215

46. Vets are the trusted advisors to farmers and uniquely positioned to offer the advice that encourages the uptake of innovative approaches. There should be greater utilisation of behavioural approaches to encourage the application of the findings of innovative research into practice.
47. Vets recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems such as Precision Livestock Farming³⁴. Within a future post-CAP agriculture policy we would welcome the use of grants or pilot schemes to trial the use of innovative technologies to improve animal health and welfare.
48. This is an opportunity to exploit the existing ecosystem of organisations with an interest in encouraging the adoption of innovation, new farm management practices and technology transfer from the lab to the field. This includes organisations such as Further Education (FE) Colleges, CAFRE, Queens University and Ulster University, AFBI and Catalyst Inc. Any new veterinary school in Northern Ireland should be utilised to coordinate this existing ecosystem of educational institutions.
49. We welcome efforts to incentivise education, CPD and knowledge exchange with the aim of professionalising the agricultural sector. In this arena Northern Ireland has been ahead of other parts of the UK, starting early with the availability of a GCSE in Agriculture and Land Use. There is also a framework providing high quality higher and further education across FE Colleges, CAFRE, Queens University and Ulster University. This is an opportunity to capitalised upon this existing structure.

Climate change and the journey towards net zero/ Game-changing improvements in biodiversity indicators in Northern Ireland.

50. With increasing recognition that animal agriculture can be a contributor to environmental degradation, climate change, habitat loss and waste, changes in UK animal production and farming practices are necessary to increase efficiency of agriculture and mitigate environmental impact.

Animal health and welfare as a key sustainability objective

51. It is important to recognise that the future of UK animal agricultural has several sustainability objectives (eg. mitigating climate change; water usage efficiency; preventing antimicrobial resistance; ensuring high animal health and welfare; preventing biodiversity loss and restoring habitats; food safety, nutrient quality and affordability). As part of efforts to make UK agriculture more sustainable, animal health and welfare should not be unnecessarily compromised to address human and environmental need. In order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them. BVA supports the Farm Animal Welfare Committee (FAWC)'s principles for sustainable agriculture and animal welfare:³⁵
 - Agriculture cannot be considered sustainable if it is achieved at an unacceptable cost to animal welfare.
 - Sustainable agriculture must take account of the fact that farmed animals are sentient individuals.
 - Sustainable agriculture must include a duty of care for the physical and mental needs and natures of farmed animals and should not depend on prolonged or routine use of pharmaceuticals, or on mutilations.
52. Approaches to, and policies on, land use and sustainable animal agriculture must therefore ensure that farm animals have a good life and a humane death. To be considered sustainable, production systems

³⁴ Precision Livestock Farming is the creation of 'a management system based on continuous automatic real-time monitoring and control of production/reproduction, animal health and welfare, and the environmental impact of livestock production'. Berkmans, D., 2014 Precision livestock farming technologies for welfare management in intensive livestock systems. Rev. sci. tech. Off. int. Epiz., 2014, 33 (1), 189-196. Available at: <https://www.oie.int/doc/ged/D13666.PDF>

³⁵ Farm Animal Welfare committee (FAWC), 2016. *Sustainable agriculture and animal welfare*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/593479/Advice_about_sustainable_agriculture_and_farm_animal_welfare_-_final_2016.pdf

should work towards positive health outcomes, the five animal welfare needs³⁶ and adhere to OIE standards for animal health and welfare, offering stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest and confidence; and excellent health outcomes.³⁷ These five animal welfare needs are set out in the Welfare of Animals Act (Northern Ireland) 2011 as:

- The need for a suitable environment
- The need for a suitable diet
- The need to be able to exhibit normal behaviour patterns
- The need to be housed with, or apart from, other animals
- The need to be protected from pain, suffering, injury and disease

Sustainable resource management to protect and conserve species, habitats and biodiversity

53. As a health-centred profession and key stakeholder in the One Health agenda, we support the development of policies that address the use of natural resources, protection and conservation of wild species, habitats and biodiversity in order to better protect the environment which both humans and animals share and reduce the ecological footprint of animal agriculture as a whole. As highlighted by the Food and Agriculture Organization of the United Nations:

54. “If managed sustainably, agricultural sectors can contribute to important ecosystem functions. These include maintenance of water quality, nutrient cycling, soil formation and rehabilitation, erosion control, carbon sequestration, resilience, habitat provision for wild species, biological pest control and pollination.”

³⁸

Innovative whole farm management systems

55. The use of innovative whole farm management systems that integrate the delivery of environmentally beneficial outcomes as well as high quality animal health and welfare food products is paramount to ensure environmentally sustainable agriculture. In terms of soil health, in 2010 the annual external cost to farmers from soil erosion and compaction from agriculture in England and Wales was estimated to be £305 million.³⁹ With this in mind, it is important to recognise the role livestock can play in optimising soil quality and productivity with whole farm management models that minimise environmental degradation and use resources and energy more efficiently.

56. Under certain circumstances and with the right conditions, inputs and attention to animal health and welfare, management options such as rotational grazing, incorporated within the context of whole farm management, can assist with restoration or improvement of soils and biodiversity.

57. Mob grazing or managed intensive rotational grazing (MIRG) for example is a form of rotational grazing whereby a high stock density is grazed in a paddock with short grazing periods and long rest periods.⁴⁰ This approach ensures that:

- Forage is harvested

³⁶ Animal Welfare Act 2006, Animal Health and Welfare (Scotland) Act 2006, Welfare of Animals Act (Northern Ireland) 2011

³⁷ Farm Animal Welfare Committee (FAWC), 2009. “Farm Animal Welfare in Great Britain: Past, Present and Future”. Available at: <https://www.gov.uk/government/publications/fawc-report-on-farm-animal-welfare-in-great-britain-past-present-and-future>

³⁸ FAO, 2017. Sustainable agriculture for biodiversity: Biodiversity for sustainable agriculture. Available at: <http://www.fao.org/3/a-i6602e.pdf>

³⁹ Defra, 2018. The Future Farming and Environment Evidence Compendium [pdf] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683972/future-farming-environment-evidence.pdf

⁴⁰ Undersander, D., 2015. Pastures for Profit: A guide to rotational grazing. [pdf] Available at: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1097378.pdf

- Soil erosion is minimised through rest periods to prevent livestock from continuously treading and compacting the same area
- Manure is dispersed through hoof action, reducing fertilizer maintenance costs and mitigating against the environmental impact of some fertilizers

58. Veterinary input in the design of managed intensive rotational grazing systems is vital to ensure that provisions are in place across rotations to adequately meet ruminant and non-ruminant nutrient, water, shade and shelter requirements and maintain animal health.

'Future-fit' animal feed

59. In addition, consideration should be given to enabling the sustainable production of animal feed that will be needed to support animal agriculture. With this in mind, there is a need to progress towards 'future-fit' animal feed⁴¹ that minimises competition for land with restorative and biodiversity practices, as well as minimising water use, pollution and overfishing. These aims should be achieved whilst maintaining the current high nutritional value of animal feed in order to continue to support animal health and welfare standards, as well as measures to protect food safety.

Vets supporting farming clients

60. The veterinary profession has a clear role to play in supporting their farming clients by advising on, developing and conducting further research into management systems and husbandry practices that work towards sustainable models of production. This is both in terms of positive animal health and welfare, public health and food safety, as well as the local environment and economic sustainability for producers.

61. This role includes taking an evidence-based approach to advising on the practical steps needed to improve existing systems such as building design, husbandry practices, biosecurity, the responsible use of medicines and disease prevention and control mechanisms. In addition, some members of the profession have the skills and capabilities required to fulfil an expert role in these areas on a national, as well as international, platform.

62. BVA is encouraging its members to provide leadership in this area, and we have developed a BVA sustainability and the veterinary profession action plan.⁴² Through this resource we are encouraging all veterinary surgeons to have a good knowledge of the contributions that the profession can make to the sustainable agriculture agenda; for example, at the levels of individuals (communicating directly to animal keepers and owners), communities (eg. veterinary practices serving as credible and informed animal welfare hubs) and nationally (eg. veterinary associations developing and advocating policy).

An evidence-based approach to considering net zero emissions

63. When considering how to achieve net zero emissions in Northern Ireland agriculture, it is important to accurately assess the global warming potential of different greenhouse gases produced by animal agriculture and develop policies to mitigate these emissions accordingly. Research by International Panel on Climate Change (IPCC) scientists from Oxford Martin School, Oxford University has demonstrated that rather than treating all greenhouse gases with a 'one-size fits all approach', there are two distinct types of emissions and they should be treated differently by using an adapted Global Warming Potential metric, GWP*.⁴³

64. For example, carbon dioxide (from farm vehicles, buildings, equipment, imported feed) and nitrous oxide (primarily from artificial fertilisers) are long-living pollutants that persist in the atmosphere. Whereas methane (produced from livestock) is a short-living pollutant that reduces over time (over an approximate

⁴¹ Forum for the future, 2018. Feed compass: the feed behind our food. Available at: [https://www.forumforthefuture.org/sites/default/files/files/feed%20behind%20our%20food_artwork_lr_compressed\(2\).pdf](https://www.forumforthefuture.org/sites/default/files/files/feed%20behind%20our%20food_artwork_lr_compressed(2).pdf)

⁴² <https://www.bva.co.uk/media/3090/bva-sustainability-and-the-veterinary-profession-action-plan-2.pdf>

⁴³ Allen, MR, Shine, KP, Fuglestedt, JS, Millar, RJ, Cain, M, Frame, DJ, & Macey, AH: A solution to the misrepresentations of CO₂-equivalent emissions of shortlived climate pollutants under ambitious mitigation. npj Climate and Atmospheric Science, 1(1), 16. <https://doi.org/10.1038/s41612-018-0026-8> (2018).

10-year cycle), meaning that methane emissions will replace old emissions and have a neutral warming impact (as long as the number of UK livestock remains at the same level).

65. Climate change and agricultural policies should therefore be designed to reflect this difference. To affect the largest change, efforts should initially be focussed on reducing the long-living emissions that are produced by animal agriculture eg. carbon dioxide and nitrous oxide. However, the UK's agricultural community must not lose sight of the fact that for methane to continue having a neutral impact, emissions must still fall, but only by 0.3% each year.⁴⁴

Breeding, technology and innovation

66. Further consideration should be given to how breeding and genetic modification⁴⁵ can be used in an ethically responsible way to improve animal health and welfare within sustainable agriculture. For example, choosing breeds that are suitable for the local environment (eg. the Herdwick sheep⁴⁶, which has adapted to live and rear young on the high fells of the Lake District⁴⁷); selecting animals with certain anatomical and conformational traits that eliminate the need for mutilations (eg. polled animals); or animals that have been bred for increased disease resistance to achieve optimal animal health, welfare and environmental outcomes.
67. We also recognise the role of new technologies and innovative methods in monitoring animal health and welfare outcomes, addressing animal health and welfare conditions and optimising the contribution of each animal to agriculture systems eg. Precision Livestock Farming.⁴⁸ We would welcome the innovative use of existing technologies eg. camera and sensory technologies to generate automated health and welfare outcome measures and monitor and reduce environmental impacts.
68. We would support incentivising uptake and development of innovative technologies to reduce the environmental impact of agriculture and improve animal health and welfare outcomes through government funding eg. grants for farms to obtain existing technology or research funding to develop new technologies.
69. However, whilst technologies have the potential to assist in the assessment of health and welfare outcomes and reduce environmental impacts, automatic systems should not replace the regular physical assessment of welfare and behavioural needs and appropriate human interventions for animals by skilled veterinary professionals and keepers.⁴⁹ Further, new technologies used to improve the contribution of animals in any given system must not compromise the welfare needs of the animals in question.

Access to labour

70. As advocates and guardians of animal health and welfare, public health and food safety within UK animal agriculture, veterinary surgeons are a crucial component of a food system that promotes high animal health

⁴⁴ Cain, M., Lynch, J., Allen, Myles R., Fuglestedt, Jan S., Frame, David J., Macey, Adrian H. Improved calculation of warming-equivalent emissions for short-lived climate pollutants *Climate and Atmospheric Science*. *npj Climate and Atmospheric Science* volume 2, Article number: 29. Available at: <https://www.nature.com/articles/s41612-019-0086-4#article-info>

⁴⁵ <https://www.ed.ac.uk/edinburgh-infectious-diseases/news-events/news-archive/gene-edited-pigs-produced-at-the-roslin-institute>

⁴⁶ Dianna Bowles, Amanda Carson, Peter Isaac, 2014. Genetic Distinctiveness of the Herdwick Sheep Breed and Two Other Locally Adapted Hill Breeds of the UK. Available at:

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0087823>

⁴⁷ Bowles, D., Carson, A. and Isaac, P, 2014. Genetic distinctiveness of the Herdwick sheep breed and two other locally adapted hill breeds of the UK. *PLoS One* 9, e87823

⁴⁸ Precision Livestock Farming is the creation of 'a management system based on continuous automatic real-time monitoring and control of production/reproduction, animal health and welfare, and the environmental impact of livestock production'. Berkmans, D., 2014 Precision livestock farming technologies for welfare management in intensive livestock systems. *Rev. sci. tech. Off. int. Epiz.*, 2014, 33 (1), 189-196. Available at: <https://www.oie.int/doc/ged/D13666.PDF>

⁴⁹ Farm Animal Welfare Committee (FAWC), 2007. Stockmanship and farm animal welfare., Available at: <https://www.gov.uk/government/publications/fawc-report-on-stockmanship-and-farm-animal-welfare>

and welfare standards. However, the veterinary profession is facing a recruitment and retention crisis. With mounting efforts from a range of stakeholders to address workforce shortages, there is much debate about the role that education and increasing the number of vet students could play in tackling these concerns.⁵⁰

71. Increasing the number of veterinary students alone won't provide a holistic, long-term approach to making sure we have enough vets in the workforce to manage and treat the Northern Ireland's food producing animals. We need to address both recruitment and retention.

Education

72. BVA supports well-structured and adequately resourced veterinary education programmes that produce a well-respected and adaptable veterinary workforce to support the UK food system. We warmly welcomed announcement by DAERA that an options analysis on veterinary education in Northern Ireland had been commissioned. This demonstrates how much the Executive values the role of the veterinary profession in the success of Northern Ireland's agri-food industry.
73. Opening a new vet school in Northern Ireland presents opportunities to encourage young people our local community to pursue a veterinary career as well as building on Northern Ireland's strengths in veterinary research into animal health and welfare and public health. We look forward to engaging positively with the options analysis on behalf of our members.
74. The UK has taken steps in recent years to expand the number of veterinary undergraduate places. This includes increases to the capacity in a number of existing veterinary schools and the establishment of new veterinary schools and partnerships: University of Surrey School of Veterinary Medicine (which produced its first graduates in 2019), Harper and Keele Veterinary School (first intake in 2020) and the University of Aberystwyth/Royal Veterinary College training hub (first intake 2021).
75. The University of Greenwich has recently agreed a partnership with the Royal Veterinary College to deliver preclinical veterinary science and medicine degrees under a (2+3) model. Plans have been unveiled to create the first new vet school at Scotland's Rural College (SRUC) in Aberdeen.
76. This new capacity is welcome, but it will take 5 years for these new routes to produce new vets.
77. There are concerns about how quickly the capacity of UK universities could be further expanded to meet a massively increased demand at short notice. Increasing capacity takes time, money (both initial capital and ongoing revenue), and personnel. The University of Surrey announced plans to open the school of veterinary medicine in October 2012; the first cohort of students did not graduate until 2019. The Surrey veterinary school cost £45 million to establish.
78. At present, it is estimated that the full of cost of veterinary education is well in excess of £20,000 per student, per year of study. Despite existing funding mechanisms, the cost of providing undergraduate veterinary education exceeds current direct income streams. Expanding the numbers of graduates in Northern Ireland must be supported by additional government funding in order to safeguard existing quality and standards in veterinary education.
79. UK students are currently subsidised by the high fees of overseas students; a re-balancing in favour of producing more domestic graduates would therefore jeopardise the funding model of some veterinary schools, requiring more additional funding per UK student place. We welcome news that from summer 2021 that international students who have successfully completed an undergraduate or master's degree will be able to benefit from two years' work experience in the UK upon graduation, through the new Graduate Route.
80. Furthermore, there is a clear trend amongst UK graduates who have favoured clinical practice over public health roles. This is evident in the fact that 95% of the veterinary workforce in abattoirs graduated overseas. However, in Northern Ireland there is a lower turn-over of OVs and the vets tend to be more

⁵⁰ <https://www.vetfutures.org.uk/>

from the local area.⁵¹ The DAERA model brings the animal health and welfare and veterinary public health roles together which may also play a role in changing the demographic profile of abattoir OVs in Northern Ireland.

81. The economic reality of veterinary education is that student tuition fees and government funding do not meet the costs of producing qualified veterinary surgeons.
82. We therefore support additional government funding for veterinary education by increasing the unit of resource per student to safeguard the quality of graduates and ensure a consistent supply of qualified veterinary surgeons.
83. However, it is important to outline that as the number of veterinary places is not capped and Government funding for education is not calculated per capita, Government funding for veterinary education does not automatically increase if a new vet school is created or if the intake of vet students at existing UK schools increases.
84. When creating additional places for veterinary students we must therefore seriously consider how this could impact on teaching standards and quality of education, as well as the potential unintended consequences on the number of students that other veterinary schools are able to admit.
85. Any increase in the number of vet students to address workforce shortages must be supported by additional government funding in order to safeguard existing quality and standards in veterinary education.

Immigration

86. The UK is highly reliant on EU vets. According to the Royal College of Veterinary Surgeons (RCVS), on 19 January 2020, there were 27,324 UK practising vets. Of these, 7,936 graduated in the EU (29% of the total). In recent years, more veterinary surgeons who registered in the UK qualified in the EU than in the UK. However, between 2019 and 2020, EU registrations dropped by 35%. This has largely been because of Covid 19 and restrictions on travel. Last ten years of annual registration data below:

Registration Year	UK	EU	ROW	Total
2011	818	472	174	1464
2012	807	573	150	1530
2013	792	664	145	1601
2014	815	713	143	1671
2015	909	981	203	2093
2016	911	973	178	2062
2017	867	963	200	2030
2018	885	1197	218	2300
2019	987	1137	225	2349
2020	1075	741	132	1948

87. The FSA estimates 95% of the veterinary workforce in abattoirs graduated overseas – with the clear majority of these coming from the EU. Losing these veterinary surgeons from slaughterhouses would increase the risk of food fraud, provide the potential for animal welfare breaches, and remove a level of public health reassurance to consumers at home and overseas that could jeopardise trade.

⁵¹ <https://apgaw.org/wp-content/uploads/2020/06/The-Future-for-Small-Abattoirs-in-the-UK.pdf>

88. Free movement of people has had an enormous impact on our veterinary workforce. Any additional barriers to the movement of EU-qualified vets to the UK have significant consequences for animal health, animal welfare, public health, and trade.
89. In February 2020 the government set out its plans for a new immigration system. Free movement has now ended as has the automatic registration of EEA qualified vets by the Royal College of Veterinary Surgeons as part of the Mutual Recognition of Professional Qualifications (MRPQ). In place of free movement is an employer-led points-based system which is likely to place a significant administrative and financial burden on veterinary businesses who will be required to sponsor recruits from outside of the UK. This new immigration system casts significant doubt over whether the profession will be able to fill the workforce gap created by the end of free movement when we are already struggling to recruit and retain vets.

Retention of existing workforce

90. Considerable efforts are underway to retain graduates within the profession. Erosion of the veterinary workforce has been an ongoing concern for BVA, RCVS and Government, which predates the decision of the UK to leave the EU.
91. Together, RCVS and BVA launched the report “Vet Futures – Taking charge of our future”⁵² in November 2015. The Vet Futures project aims to improve retention of the existing veterinary workforce by ensuring veterinary professionals are confident, resilient, healthy and well supported, and benefit from exceptional leadership. In July 2016, the Vet Futures Action Plan,⁵³ was launched with a series of actions to make this vision a reality. These actions are ongoing, and a review of the project is underway.

Paraprofessionals

92. Consideration is also being given to how the veterinary team can be reformed to allow paraprofessionals to take on additional tasks, freeing up veterinary time. In response to the expected increase in demand for EHCs, government introduced the new role of Trade Certifying Support Officers (TCSOs) in Northern Ireland, in Great Britain this role is referred to as a Certification Support Officer (CSO).
93. Approved Tuberculin Testers (ATTs) are para-veterinary professionals with the authority to carry out statutory TB skin testing of cattle. ATTs have been used in Great Britain by APHA since 2005. Their use has been expanded to veterinary practice following a consultation conducted in summer 2018 and the completion of an ATT pilot study which ran from December 2018 to February 2020.
94. The Official Veterinarian leads the Meat Inspection Team working in the meat premises. The OV is assisted in relation to meat hygiene and inspection duties by qualified Official Auxiliaries or Meat and / or Poultry Meat Inspectors as they are known.
95. Further reforms need to be undertaken in a measured way that prioritises animal health, animal welfare and public health and does not undermine the role of the veterinary surgeon in diagnosis or the integrity of the veterinary surgeon’s signature. Some of this work is being undertaken as part of the RCVS Legislation Review.

The impacts of Brexit and the Northern Ireland Protocol on usual trading arrangements in the sector.

96. The Protocol on Ireland/Northern Ireland is the part of the Withdrawal Agreement that sets out the arrangements to maintain an open border on the island of Ireland after the end of the transition period. According to the Protocol, Northern Ireland will remain aligned to a range of EU single market rules, including rules relating to goods, sanitary rules for veterinary controls, rules on agricultural

⁵²BVA, RCVS *Vet Futures – Taking charge of our future*, 2015
<<https://www.vetfutures.org.uk/download/reports/Vet%20Futures%20report.pdf>>

⁵³ BVA, RCVS *Vet Futures Action Plan 2016-2020*, 2016
<[https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016\(5\).pdf](https://www.vetfutures.org.uk/download/publications/vet%20futures%20report%202016(5).pdf)>

production/marketing, VAT and excise for goods and state aid. This is to avoid a hard border. The European Commission's Q and A⁵⁴ says:

- Northern Ireland will continue to apply the Union's Customs Code and will remain aligned to those rules of the Single Market in order to avoid a hard border on the island of Ireland.
- The necessary checks and controls will take place on goods entering Northern Ireland from the rest of the UK, including, for example, Border Inspection Posts to ensure that the necessary sanitary and phytosanitary ("SPS") controls are carried out.
- UK authorities will implement and apply the provisions of Union law that the Protocol makes applicable in the UK in respect of Northern Ireland. Therefore, all checks will be carried out by UK authorities with appropriate supervisory and enforcement mechanisms for the EU.

97. The Northern Ireland Protocol gives the joint committee specific responsibility for certain aspects relevant to the trade in live animals and products of animal origin. This includes determining the practical arrangements for EU supervision of UK implementation and enforcement of specific aspects of the Protocol, as well as review the implications of the Protocol for the UK internal market, and north-south co-operation. Should the NI institutions reject the provisions in the Protocol the joint committee will make recommendations to the UK and the EU.
98. The joint committee will also determine the criteria according to which goods moving from Great Britain to NI will be considered not "at risk" of subsequently moving into the EU, and therefore will not be subject to EU customs duties. Note this responsibility refers only to customs duties, and not regulatory or SPS checks.
99. While there may be some scope of the joint committee to consider approaches, which may limit the need for Export Health Certification documents or veterinary checks for goods entering Northern Ireland from Great Britain, it would appear this scope is much narrower than that open to customs issues.
100. Article 6(1) on "protection of the UK internal market" provides that the Protocol shall not prevent "unfettered market access for goods" moving from Northern Ireland to Great Britain. It sets out that there will be no restrictions of any kind on goods moving from Northern Ireland to the remainder of the United Kingdom, and that the UK and the EU will use their "best endeavours" to "facilitate" trade from Great Britain to Northern Ireland. UK law can also regulate the sale of products made in Northern Ireland that are placed on the market in Great Britain.
101. An Export Health Certificate (EHC) signed by an Official Veterinarian (OV) is required to transport animals, products of animal origin or germplasm from Great Britain to the EU Single Market. The OV signature attests that relevant public and animal health requirements have been met. This requirement has been delayed for Authorised Traders partaking in the The Scheme for Authorised Movements to Northern Ireland (STAMNI).
102. The UK Government has announced a continuation of the STAMNI grace period beyond 31 March 2021. arrangements for authorised traders will continue to be in place until at least 1 October 2021. This means authorised traders can continue to move products of animal origin, composite products, food and feed of non-animal origin from Great Britain to Northern Ireland without the need for official certification. Government proposes to introduce certification requirements for authorised traders in phases from October 2021. The precise timing of subsequent phases is unknown but is expected to be dependent on the delivery of the Digital Assistance Scheme.
103. Movements from Northern Ireland to Great Britain do not require an EHC. However, where animal products move throughout the UK, including from Northern Ireland to Great Britain, for further processing, storage and export to EU/ Northern Ireland, it may need to be certified to provide the necessary assurance required for issue of the final EHC. This certification can be issued in the form of a Support (Health) Attestation (SHA).

⁵⁴ https://ec.europa.eu/commission/presscorner/detail/ro/QANDA_19_6122

104. New trading requirements between Northern Ireland and Great Britain are not yet in full effect. Therefore, understanding how this will impact on a range of issues affecting the Northern Ireland agri-food sector is still uncertain, and thus makes the ability to make long-term strategic plans based on an expected end-point difficult.

Standards in trade deals

105. EU exit presents opportunities for the UK to negotiate new trade deals. However, there are concerns this might allow the UK to import animals and animal products that have been reared to lower health and welfare standards than expected for producers in the UK. All parts of the UK must safeguard the UK's reputation for high standards of animal health, animal welfare, and food safety. In all trade agreements it negotiates, the UK government must secure the inclusion of equally high standards of animal health, animal welfare, public health and food safety as well as responsible antimicrobial use.

106. Ahead of the 2019 general election, the conservative manifesto committed that in all trade negotiations, the UK would not compromise on our high environmental protection, animal welfare and food standards.⁵⁵ This principle should be enshrined in legislation.

107. Allowing goods onto the UK market which fail to meet current UK standards of animal health, animal welfare and public health would increase the need for SPS checks on all goods leaving the UK and entering the EU Single Market. The application of the Northern Ireland Protocol would mean these same checks would potentially be required for goods moving from Great Britain to Northern Ireland. This would place an additional administrative and cost burden on producers and increase the potential for delays.

⁵⁵ The Conservative and Unionist Party Manifesto 2019, page 57