BVA response to UK-Australia FTA: Trade and Agriculture Commission call for evidence

Sanitary and Phytosanitary (SPS) measures
The agreement in principle stated that imports “will still have to meet the same respective UK and Australian food safety and biosecurity standards.” This has now been agreed in the final text of the Free Trade Agreement (FTA). As such, the UK retains the ability to ban goods based on animal or public health grounds. However, this would not apply to barriers that are based on animal welfare grounds or environmental concerns.

Animal Welfare
Animal welfare standards diverge significantly between the UK and Australia. Defra and the devolved governments 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 UK’s Animal Welfare Acts. In comparison, the lack of a national strategy for animal welfare in Australia acts as a barrier for full implementation of OIE standards and continual improvement.

Although Australia is working towards converting the Model Codes of Practice into Australian Animal Welfare Standards and Guidelines aimed at harmonising and streamlining livestock welfare legislation, progress has been slow. Extreme confinement systems for pigs and poultry are still permitted.

The BVA position on the welfare of animals at slaughter recommends that “all animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering.” It is a statutory requirement for all animals to be effectively stunned before slaughter. There is a derogation in place to permit slaughter without stunning in accordance with religious rites which provides food which is intended for consumption by Jews and Muslims.

The slaughter of non-stunned animals remains allowed across Australia. The Model Code of Practice for Domestic Poultry requires that ‘birds must be slaughtered in a manner that minimises handling and stress’, but it is not mandated that birds shall be stunned before being slaughtered.

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1 Animal Welfare Act 2006, the Animal Health and Welfare Act 2006 (Scotland) and the Welfare of Animals Act (Northern Ireland) 2011
2 https://api.worldanimalprotection.org/country/australia
3 https://www.bva.co.uk/take-action/our-policies/welfare-of-animals-at-slaughter/
4 https://www.bva.co.uk/media/3664/full-position-bva-position-on-the-welfare-of-animals-at-slaughter.pdf
5 https://api.worldanimalprotection.org/country/australia
In Australia, sheep raised for wool are commonly subjected to a painful procedure called mulesing, where flaps of skin from around a lamb’s breech and tail are cut off using sharp shears to reduce the risk of flystrike. Mulesing has never been practiced in the UK. The practice is used mainly in the Merino breed, and breeding to reduce the need for mulesing is a long-term aim. Merinos are crossed with other breeds for meat production, so the welfare concerns are not limited only to wool production. RSPOCA Australia\(^6\) is opposed to mulesing and some clothing brands have ceased using Australian wool due to welfare concerns. However, there is still opposition to a complete ban.

The use of analgesia (pain relief) during the mulesing procedure is inconsistent. Rules differ between states. There are best practice guidelines produced by Meat and Livestock Australia (MLA) which include advice on use of analgesia and accreditation of contractors undertaking the procedure.\(^7\) However, there is no data on adoption of the guidelines.

In 2008, the Australian Wool Exchange (through which around 90% of Australian wool is sold) introduced the National Wool Declaration (NWD).\(^8\) This declaration allows wool growers to voluntarily communicate the mulesing status of their sheep to wool buyers at auction. In July 2021 national percentage of bales with mulesing status declared was 74%. The percentage declared ‘non mulesed’ and ‘ceased mulesed’ was 15% and 4% respectively and the percentage of bales declared that pain relief was used was 41%.\(^9\)

The use of some Hormonal growth promoters (HGPs) in beef is approved in Australia. In the UK, the use of growth promoters is banned, and pharmacological hormones are restricted for clinical use only.

Within the UK, Australian products would become indistinguishable from UK produce, jeopardising the ability of exporters to trade using the good reputation of the UK as a high animal health and welfare producer.

**Conclusion**

Ongoing consultation with the veterinary profession on all relevant aspects of trade will be essential. BVA, as the representative body for the profession, looks forward to engaging with the Trade and Agriculture Commission as this FTA and others progress.

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