

BVA response to Trade and Agriculture Commission call for evidence on UK-India free trade agreement

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) We welcome the opportunity to provide evidence to the Trade and Agricultural Commission (TAC) relating to the free trade agreement (FTA) between the UK and India.

Protecting Animal Health and Welfare

- 3) It is essential that the UK safeguards its high reputation for animal health, animal welfare, and food safety. In all trade agreements it negotiates, the Government must only grant tariff-free access to agricultural goods where there is equivalence with core standards of animal health, animal welfare, public health, food safety, and responsible antimicrobial use.
- 4) We welcome the inclusion of a dedicated animal welfare cooperation chapter in the UK-India FTA. This reflects a positive evolution in UK trade policy, which has historically not addressed measures to ensure animal welfare. However, we note that the commitments remain non-binding and without measurable outcomes or mechanisms for enforcement.
- 5) While the agreement excludes many products directly relevant to animal health and welfare concerns, such as dairy products, poultry, eggs, and lamb, it is equally important to acknowledge animal-origin products classified as industrial goods (leather and wool), and products from aquaculture in assessing the impacts on animal health and welfare, public health and food safety. These sectors raise significant welfare concerns, yet are often overlooked in trade policy despite being liberalised under the agreement.
- 6) With the UK already a significant market for Indian leather exports, it is thought that the Indian leather industry will be a key beneficiary of the trade agreement.¹ However, there are significant welfare concerns related to the production of leather within India. This concern has been reflected by companies within the UK, such as Marks & Spencer and Clarks, which have explicitly prohibited the use of cow hides sourced from India within their products due to animal welfare concerns.^{2 3}
- 7) The Indian leather industry is multi-sourced, with it estimated that 40% of leather exports from

¹ "India's Leather, Footwear Exports to UK Likely to Double to \$1 Billion: Piyush Goyal," *The Economic Times*, July 29, 2025, <https://retail.economictimes.indiatimes.com/news/apparel-fashion/footwear/indias-leather-footwear-exports-to-uk-likely-to-double-to-1-billion-piyush-goyal/122968625>.

² Marks & Spencer, Responsible Leather Sourcing Policy v3.0, accessed August 14, 2025, <https://corporate.marksandspencer.com/sites/marksandspencer/files/Sustainability/Our%20Products/Clothing-and-Home-Raw-Materials/Animal-Derived-Materials/Responsible%20Leather%20Sourcing%20Policy%20v3.0%20.pdf>.

³ Clarks, Animal Welfare Policy: Responsible Sourcing of Animal-Derived Materials, accessed August 14, 2025, <https://corporate.clarks.com/made-to-last/media/AnimalWelfarePolicy.pdf>.

India originate as buffalo hides, 30% from goat rawhide skins and the remainder originating from cows and sheep.⁴ Concerns about the welfare of these animals include conditions faced over long-distance transport, including overcrowding, lack of food and water and rough handling during loading and unloading.^{5 6 7} There are additional concerns about weak traceability systems and slaughter in unregulated facilities.⁸

- 8) In contrast, leather produced in the UK is subject to strict welfare standards, including the Welfare of Animals at the Time of Killing (WATOK) regulations 2015, alongside devolved equivalents.^{9 10}
^{11 12 13} Within these requirements, excluding religious exemptions, animals must be stunned before slaughter, under veterinary oversight, and handled with minimal stress. However, the UK currently impose no welfare-based import restriction on leather, meaning goods produced under significantly lower welfare standards can enter the UK market tariff-free and be sold essentially indistinguishable from UK products.
- 9) Similar concerns apply to wool and woollen products, which may also be included under the category of tariff-free textile imports. Wool production can carry many welfare risks, including poor handling, extreme climate conditions, long-distance live transport and limited traceability.¹⁴ Without clear welfare standards in place, UK consumers risk enabling the continuation of these poor welfare practices.
- 10) The agreement will also see an elimination of tariffs on seafood products such as shrimp and tuna. It is BVA's position that aquaculture must be environmentally, ethically and economically sustainable, with animal health and welfare central to that definition.¹⁵ We are therefore concerned with reports on Indian aquaculture, including high stocking densities, poor water

⁴ R. Leema Rose and G. Anil Kumar, "Impact of Ban on Cow Slaughter on Indian Leather Industry," International Journal of Research Culture Society 5, no. 1 (January 2021): 104, accessed August 14, 2025, <http://www.ijrcs.org/wp-content/uploads/IJRCs202101020.pdf>.

⁵ Chirantana Mathkari, "The Cow Paradox—A Scoping Review of Dairy Bovine Welfare in India Using the Five Freedoms," Animals 15, no. 3 (2025): 454. <https://www.mdpi.com/2076-2615/15/3/454>.

⁶ Yamini Narayanan, "Jugaad and Informality as Drivers of India's Cow Slaughter Economy," *Environment and Planning A: Economy and Space* 51, no. 4 (2019): 755–773. <https://doi.org/10.1177/0308518X19852640>

⁷ Temple Grandin, *Improving Animal Welfare: A Practical Approach*, 3rd ed. (Wallingford, UK: CABI, 2019), 399. [https://www.academia.edu/download/67422528/Improving Animal Welfare A Practical Approach 3rd Edition Bo_oxsvets.blogspot.com_.pdf#page=399](https://www.academia.edu/download/67422528/Improving_Animal_Welfare_A_Practical_Approach_3rd_Edition_Bo_oxsvets.blogspot.com_.pdf#page=399)

⁸ Yamini Narayanan, "Jugaad and Informality as Drivers of India's Cow Slaughter Economy," *Environment and Planning A: Economy and Space* 51, no. 4 (2019): 755–773. <https://doi.org/10.1177/0308518X19852640>

⁹ *The Welfare of Animals at the Time of Killing Regulations 2015*, SI 2015/1782 (UK).

<https://www.legislation.gov.uk/uksi/2015/1782/contents>

¹⁰ *The Welfare of Animals at the Time of Killing (England) Regulations 2015*, SI 2015/1782.

<https://www.legislation.gov.uk/uksi/2015/1782/contents>

¹¹ *The Welfare of Animals at the Time of Killing (Wales) Regulations 2014*, SI 2014/951 (W. 92).

<https://www.legislation.gov.uk/wsi/2014/951/contents>

¹² *The Welfare of Animals at the Time of Killing (Scotland) Regulations 2012*, SSI 2012/321.

<https://www.legislation.gov.uk/ssi/2012/321/contents>

¹³ *The Welfare of Animals at the Time of Killing (Northern Ireland) Regulations 2014*, SR 2014 No. 107.

<https://www.legislation.gov.uk/nisr/2014/107/contents>

¹⁴ G. Kansal and A.K. Misra, "An Insight into the Challenges to Welfare of Small Ruminants in India and Their Mitigation Strategies," *Indian Journal of Animal Production and Management* 37, no. 3–4 (2021): 102–110.

<https://epubs.icar.org.in/index.php/IJAPM/issue/download/4199/1338#page=104>

¹⁵ British Veterinary Association. *BVA Policy Position on UK Sustainable Finfish Aquaculture*. Last modified April 2023.

<https://www.bva.co.uk/take-action/our-policies/uk-sustainable-finfish-aquaculture/>

quality, disease prevalence and the continued use of eyestalk ablation in shrimp hatcheries to induce spawning.^{16 17} In relation to tuna, which is predominantly wild-caught, sustainability and welfare concerns relate more to fishing practices, including bycatch, capture methods, and stock management.

- 11) In light of these concerns, we recommend that tariff-free access for leather, wool and seafood products under the UK-India FTA be conditional upon compliance with UK-equivalent welfare standards at all stages of production and supply.

Sanitary and Phytosanitary (SPS) Measures

- 12) SPS measures form a vital part of the UK's biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. They serve a vital purpose: ensuring the maintenance of public and animal health through effective disease surveillance and control. The consequences of failing to do this could be catastrophic to multiple sectors of the UK's economy.
- 13) While the SPS chapter in the agreement retains the UK's right to set its own biosecurity rules, BVA seeks assurances that these rules will be supported by strict enforcement and risk-based import controls to ensure compliance. This is particularly important given the National Audit Office's recent report, 'Resilience to Animal Diseases', which highlighted that the UK is insufficiently prepared for a severe animal disease outbreak and has significant gaps in contingency planning, as well as infrastructure and operational processes.¹⁸
- 14) Effective enforcement of SPS measures is entirely dependent on adequate veterinary workforce capacity. The NAO's report also identified a 20% veterinary vacancy rate within the APHA.¹⁹ These capacity constraints increase the risk of failing to recognise the introduction of serious notifiable diseases. While the UK's trade with India is primarily in products of animal origin (POAO) rather than live animals, recent outbreaks in of avian influenza, lumpy skin disease, African swine fever, and foot-and-mouth disease in India, underscore the importance of robust pre-import certification processes, adequate veterinary resource at points of entry, and the ability to suspend imports rapidly in the event of an outbreak.^{20 21 22 23}
- 15) SPS provision must be maintained and strengthened in future trade negotiations to reflect the

¹⁶ Sudhansu S. Mishra, D. Rakesh, and M. Dhiman, "Present Status of Fish Disease Management in Freshwater Aquaculture in India: State-of-the-Art Review," ResearchGate, 2017.

<https://www.researchgate.net/publication/320628788>

¹⁷ Global Seafood Alliance, "GSA Survey Explores the Prevalence of Shrimp Eyestalk Ablation and Challenges to Adopting Alternative Practices," Global Seafood Alliance Blog, May 20, 2024, accessed August 20, 2025.

¹⁸ National Audit Office, Resilience to Animal Diseases, HC 946 (2025). <https://www.nao.org.uk/reports/resilience-to-animal-diseases/>

¹⁹ Ibid.

²⁰ G. Govindaraj et al., "Foot and Mouth Disease (FMD) Incidence in Cattle and Buffaloes and Its Associated Farm-Level Economic Costs in Endemic India," Preventive Veterinary Medicine 190 (May 2021): article 105318, <https://doi.org/10.1016/j.prevetmed.2021.105318>.

²¹ Lisa Schnirring, "Bangladesh and India Alert WHO About New H5N1 Infections," CIDRAP, July 11, 2024.

<https://www.cidrap.umn.edu/avian-influenza-bird-flu/bangladesh-and-india-alert-who-about-new-h5n1-infections>

²² Naveen Kumar and Bhupendra Nath Tripathi, "A Serious Skin Virus Epidemic Sweeping through the Indian Subcontinent Is a Threat to the Livelihood of Farmers," Virulence 13, no. 1 (November 1, 2022): 1943–44, <https://doi.org/10.1080/21505594.2022.2141971>.

²³ Food and Agriculture Organization of the United Nations (FAO), African swine fever (ASF) situation update in Asia & Pacific, accessed August 26, 2025, <https://www.fao.org/animal-health/situation-updates/asf-in-asia-pacific/en>.

UK's commitment to high biosecurity standards. Any steps to liberalise and expedite trade flows, for example by opening up tariff-free trade routes from India, should not come at the expense of biosecurity and the veterinary checks and disease surveillance that promote it.

Antimicrobial Resistance

- 16) While many animal products are excluded from tariff liberalisation under the agreement, and are therefore outside of the scope of influence, the deal will remove all UK tariffs on Indian seafood products, including shrimp. India's aquaculture sector has faced criticism for its widespread prophylactic use of antimicrobials, including classes of antibiotics critical for human medicine. In some cases, antibiotics banned in the UK are still permitted in India.²⁴ Without safeguards, tariff-free market access could incentivise the continued use of these practices and risk undermining the UK's domestic progress on this front.
- 17) As outlined within our position on antimicrobial resistance (AMR), antimicrobials are essential to both veterinary and human medicine to treat infectious diseases.²⁵ However, the veterinary profession is concerned about the implications of the development of AMR. This development has stemmed from the increasing use of antimicrobials, with each use increasing the risk of selection for resistant bacteria and other organisms.
- 18) In recognition of these concerns, the UK Government published a 20-year vision for AMR, supported in the short term by a five-year action plan. These plans aim to reduce unnecessary antibiotic and antimicrobial use in humans and animals, ending their use for growth promotion, and supporting high standards of stewardship internationally.^{26 27}
- 19) However, trade agreements have the potential to support or undermine these goals. Without robust frameworks within trade deals that do not permit, or account for the impact of imports from countries where routine prophylactic antibiotic or antibiotic growth promotion is permitted, the UK risks undermining progress on AMR and contributing to the overall burden, despite attempting to address it domestically.
- 20) Despite the Government recognising the risks associated with prophylactic use of antibiotics, and the Veterinary Medicines Regulations mandating that any prophylactic or metaphylactic antibiotic use be accompanied by a management review domestically, there is no acknowledgement within the agreement that prophylactic use of antibiotics in farming is common

²⁴ Southern Shrimp Alliance, "Food Regulatory Authorities in the EU, Japan, and the United States Once Again Confirm That India and Vietnam Continue to Use Banned Antibiotics in Their Shrimp Aquaculture," [shrimpalliance.com](https://shrimpalliance.com/food-regulatory-authorities-in-the-eu-japan-and-the-united-states-once-again-confirm-that-india-and-vietnam-continue-to-use-banned-antibiotics-in-their-shrimp-aquaculture/), February 16, 2022. <https://shrimpalliance.com/food-regulatory-authorities-in-the-eu-japan-and-the-united-states-once-again-confirm-that-india-and-vietnam-continue-to-use-banned-antibiotics-in-their-shrimp-aquaculture/>

²⁵ British Veterinary Association, *Policy Position on the Responsible Use of Antimicrobials in Food-Producing Animals*, May 2019. <https://www.bva.co.uk/take-action/our-policies/responsible-use-of-antimicrobials/>

²⁶ United Kingdom Department of Health and Social Care, *Contained and Controlled: The UK's 20-Year Vision for Antimicrobial Resistance*, policy paper, January 24, 2019. <https://www.gov.uk/government/publications/uk-20-year-vision-for-antimicrobial-resistance>

²⁷ United Kingdom Department of Health and Social Care et al., *Confronting Antimicrobial Resistance 2024 to 2029: UK 5-Year Action Plan*, policy paper, May 8, 2024. <https://www.gov.uk/government/publications/uk-5-year-action-plan-for-antimicrobial-resistance-2024-to-2029>

in India.^{28 29}

- 21) We welcome the agreement's provisions for cooperation on AMR, including information-sharing, technical collaboration and best practice exchange. However, with these commitments being non-binding, lacking measurable targets, enforcement mechanisms, or timelines for implementation, we hold significant concerns for the impact on AMR.
- 22) Given the significant risks posed by current antimicrobial practices within Indian aquaculture, BVA strongly recommends that tariff-free access for seafood products should be conditional upon demonstrable application of UK-equivalent standards of antimicrobial use, or clear evidence that businesses are working towards these within a defined timeframe.

²⁸ United Kingdom, Veterinary Medicines Regulations 2024, SI 2024/567; Antimicrobial Resistance: Clarification of New Elements Applied from the VMR (Veterinary Medicines Directorate guidance), GOV.UK, May 17 2024

²⁹ Usha Arora, Rimplejeet Kaur, and Pankaj Goel, "Antimicrobial Resistance in India: Drivers and Mitigation Strategies," *Frontiers in Public Health* 11 (2024): Article 10955645. <https://pmc.ncbi.nlm.nih.gov/articles/PMC10955645/>