BVA RESPONSE TO DEPARTMENT FOR INTERNATIONAL TRADE CONSULTATION ON TRADE WITH THE COMPREHENSIVE AND PROGRESSIVE AGREEMENT FOR TRANS-PACIFIC PARTNERSHIP (CPTPP)

Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 17,000 members. BVA represents, supports and champions the interests of the veterinary profession in this country. We therefore take a keen interest in all issues affecting the profession and how the profession can effectively serve the needs of society.

2. In this paper the terms veterinary surgeon, veterinarian and vet are used interchangeably. An Official Veterinarian (OV) is a veterinary surgeon appointed by government to carry out authorised duties on its behalf.

3. We welcome the opportunity to provide a submission on future trade with the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).

Introduction

4. International trade in animals and animal products depends on a combination of factors which should be considered to ensure smooth trade, without incurring unacceptable risks to public health and animal health and welfare. Veterinary surgeons, as qualified professionals who play an essential role in the operation of international trade, wish to see a high standard of animal health, welfare and food hygiene prioritised within any future trade negotiations and deals.

5. High UK animal welfare, animal health and public health (including food safety) standards should not be undermined by cheaper imports produced to lower standards. As public goods, recognised within the Agriculture Bill,¹ the UK should uphold these standards in all trade negotiations.

6. There is considerable divergence in standards between the countries which are part of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). The Animal Protection Index gives the UK an A grade in farm animal protections and in overall animal welfare. New Zealand, a current member, also holds A grades. By comparison

Vietnam has a weaker record, holding an F grade overall and a D for farm animal protections.²

7. Leaving the EU may offer opportunities not enjoyed by being a member of the EU trading bloc. Where opportunities are present to improve standards in accordance with evidence-based risk analysis of animal health, public health, welfare and ethics, these should be seized. Any actual or perceived risks and threats should be approached, in the same rational way, and mitigated to minimise the risks for animal health, animal welfare, public health and the UK farming and food industry.

8. Allowing goods onto the UK market which fail to meet EU standards of animal health, animal welfare and public health would increase the need for Sanitary and Phytosanitary (SPS) checks on all goods leaving the UK and entering the EU Single Market. This would place an additional administrative burden on UK producers and increase the potential for delays on produce reaching the EU market.

9. OVs both certify and supervise the import and export of animals and animal products to and from third countries. The role of veterinary surgeons in trade, protecting public health, food safety and animal health and welfare is recognised as essential around the world.

10. The Department for International Trade White Paper, Preparing for our future UK trade, states the following approach to trade.

   “In order to ensure continuity in relation to our trade around the world and avoid disruption for business and other stakeholders, the UK needs to prepare ahead of its exit from the EU for all possible outcomes of negotiations and to ensure that we have the necessary legal powers and structures to enable us to operate a fully functioning trade policy after our withdrawal from the EU.”³

11. For the Government to implement this approach the role of the veterinary workforce, as a vital structure in facilitating international trade, must be recognised and prioritised. The demand of veterinary certification is increasing and will grow significantly following exit from the EU. Nigel Gibbens, when Chief Veterinary Officer UK, suggested that this could lead to the volume of products requiring veterinary export health certification increasing by up to 325%.⁴ Increased trade with third countries will require veterinary certification in addition to this figure.

12. Ensuring the UK has a veterinary workforce to meet this demand will be critical to ensuring the UK is able to exploit the opportunities of a new trade relationship with countries outside the EU. Therefore, the Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the EU or from outside the EU, to ensure this essential veterinary work continues.

Objectives for a future trade deal

13. As the UK leaves the EU and looks to forge new and ambitious trade relationships, we welcome the Government commitment to “ensuring the maintenance of high standards of

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³ Department for International Trade, Preparing for our future UK trade, 2017
consumer, worker and environmental protection in trade agreements. In our response to the Department for International Trade White Paper, Preparing for our future UK trade policy, BVA called for this commitment to be expanded to explicitly include public goods: animal health; animal welfare; public health (including food safety); and responsible use of antimicrobials.

14. 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. The Secretary of State for Environment, Food and Rural Affairs has stated that trade deals should not water down the standards that support the reputation of UK produce:

“[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.”

15. A new trade agreement could allow imports that fail to meet these current high standards onto the UK market. Industry producing to lower standards of health and welfare would hold a “competitive advantage” over UK farmers, undercutting UK producers on price.

16. Within the UK these goods 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. This would increase the risk posed by goods leaving the UK failing to meet EU SPS standards. Consequently, the need for risk-based checks on UK goods entering the EU Single Market would rise. This would place additional delays on UK producers selling into the EU.

17. The UK Government should seek to apply a single standard to the production of animal products destined either for UK consumers or foreign markets. A single standard that includes veterinary controls and certifications will avoid the confusion and the opportunity for fraud that is associated with multiple parallel standards, avoid compromised animal health and welfare, and ensure consumer confidence at home and abroad.

Animal Welfare

18. Animal welfare is a global concern amongst other pressing concerns including climate change, biodiversity loss, antimicrobial resistance and food security for a growing human population. 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.

19. UK citizens place value in the welfare of farmed animals. In a recent survey of 600 people in Great Britain, 96% agreed that we have a moral obligation to safeguard the welfare of

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5 Department for International Trade, Preparing for our future UK trade, 2017
6 British Veterinary Association, Preparing for our future UK trade policy: British Veterinary Association Submission, 2017
8 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
animals. Through the Agriculture Bill, the UK will provide financial support to farmers to protect and improve animal welfare, as a public good. However future trade deals may undermine this investment. The House of Lords European Union Committee noted the “greatest threat to farm animal welfare standards post-Brexit would come from UK farmers competing against cheap, imported food from countries that produce to lower standards than the UK.”

20. To ensure domestic animal welfare standards and to support animal welfare globally, the Government must secure the inclusion of high farm animal welfare standards in all trade agreements it negotiates, including with the CPTPP countries. Where opportunities are available to improve the welfare of farmed animals, these should be considered in all future trade deals.

Animal Health

21. Protecting animal health through standards and surveillance must be an objective of any further trade policy, to effectively detect, respond to, and prevent outbreaks of disease in animal populations. Outbreaks can have immense social and economic consequences. 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 postponed.

22. The UK Government should ensure that trade deals, in respect of animals and animal products, take account of already agreed protocols such as those applied by the EU or the OIE and are backed by appropriate veterinary certification.

23. Most pathogens, particularly in animal products, cannot be practically detected during border checks. This is because checks at the border are insufficiently sensitive to detect risk. Future trade deals should emphasise checks at the point of production, where they are more effective.

Public health including food safety

24. Animal health is inextricably linked to human health. Zoonoses are infections or diseases that can be transmitted directly or indirectly between animals and humans, for instance by consuming contaminated foodstuffs or through contact with infected animals. The severity of these diseases in humans varies from mild symptoms to life-threatening conditions. Among emerging infectious diseases, 75% are zoonotic.

25. To protect public health the safety of animals and animal products must be prioritised in trade deals. It is imperative that standards are maintained from farm to fork.

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Antimicrobial resistance

26. The UK Government has demonstrated strong leadership at home and globally in tackling the issue of antimicrobial resistance. Thanks to these efforts, action has been taken at all levels, at the United Nations; within the EU and domestically. As the forward to the UK Five Year Antimicrobial Resistance Strategy 2013 to 2018 notes:

“There are few public health issues of greater importance than antimicrobial resistance (AMR) in terms of impact on society. This problem is not restricted to the UK. It concerns the entire world and requires action at local, national and global level.”

27. Encouraged by the publication of the O’Neill Review on Antimicrobial Resistance, the UK agricultural and food industry has taken steps to further the responsible use of antimicrobials. BVA is a member of the Responsible Use of Medicines in Agriculture (RUMA) alliance. In October 2017, RUMA launched sector specific targets for antimicrobial use. UK veterinary sales data show the industry is already acting, with reductions in overall sales and sales of the most critically important antimicrobials.

28. Responsible on-farm antimicrobial use must be incorporated into future trade deals to ensure progress on responsible antimicrobial use is not undermined.

The role of vets in international trade

29. The import and export of animals and products of animal origin to third countries, including the CPTPP countries, is dependent on veterinary certification. Veterinary certification is dependent on having available a sufficient number of adequately trained veterinary surgeons. International Veterinary Certificates are defined by the World Organisation for Animal Health (OIE), the reference organisation of the World Trade Organization (WTO) as:

“A certificate, issued in accordance with Chapter 5.2 [of the Terrestrial Animal Health Code], describing the animal health and public health requirements that are fulfilled by the exported commodities.”

30. Veterinary certification is applied to live animals, as well as products of animal origin. These are defined as any products derived from animals or products that have a close relationship with animals. They include:

- fresh red meat, white meat, game and offal

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14 Veterinary Medicines Directorate, Veterinary Antimicrobial Resistance and Sales Surveillance 2016, 2017
• meat products (e.g. cured meats, cooked meats)
• fish, shellfish and fish products
• processed animal protein for human consumption
• processed pet food or raw material for pet food production
• lard and rendered fats
• animal casings
• milk and milk products
• eggs and egg products
• honey
• semen, embryos, ova
• manure, blood and blood products
• bones, bone products and gelatine
• hides and skins
• bristles, wool, hair and leathers
• hay and straw
• hunting trophies, i.e. animal heads and skins
• insect pupae

31. Additionally, any items which contain products of animal origin, may be subject to certification. Animal products are found in confectionary that uses gelatine and wine and beer where isinglass (derived from the bladders of fish) is used. Consideration should be given to the supply chains behind non-food products that depend on animal products.

32. OVs certify and supervise the import and export of live animals and other animal products to and from third countries ensuring smooth trade. Veterinary surgeons providing official controls at food premises (exporting food) and at border inspection posts (checking imported food) are vital for the protection of the UK consumer and national freedom from animal health diseases (e.g. Foot and Mouth Disease and African Swine Fever). OIE has emphasised the importance of the role of veterinary surgeons in supervising food safety:

“[The] OIE has identified animal production food safety as one of its high priority initiatives. The Veterinary Services of our Member Countries are central to this mission. They have an essential role to play in the prevention and control of food-borne zoonoses, even when animals are not clinically affected…The OIE will continue to publicise and promote the fundamental role of the Veterinary Services in the area of food safety, both on-farm and at the abattoir level.”

Capacity to meet veterinary certification

33. If a trade deal were agreed between the UK and the CPTPP countries, the resulting increased volume of trade in products of animal origin would require a marked increase in veterinary certification. This is addition to any increased demand for veterinary certification and supervision for exports destined for the EU. Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade and to exploit new trade deals outside of the EU.

34. The UK veterinary workforce is highly reliant on EU graduates. Statistics from the RCVS reveal the dependence of the UK on non-UK EU vets. The RCVS currently registers around 1,000 overseas vets per year, of which EU nationals make up the clear majority. In 2016, the proportion of all new registrants in that year from non-UK EU vet schools was 47%.\(^{19}\)

35. In the meat hygiene sector, this proportion is even higher with estimates suggesting 95% of the veterinary workforce graduated overseas - with the clear majority of these coming from the EU. Losing Official Veterinarians (OVs) 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. There are concerns within the meat processing industry about the potential impact of a post Brexit veterinary workforce shortage.

36. Within the EU trading bloc there is no need for additional veterinary certification. Brexit will change that for the UK, but the extent of the changes will depend on the nature of the UK’s exit and the international trade deals agreed. In the event no deal on regulatory alignment is reached between the EU and UK, there may be a requirement for veterinary checks on all animals and animal products at the border to maintain SPS standards.

37. Post-Brexit there will almost certainly be increased demand for veterinary certification and supervision. Currently, up to 30% of Official Veterinarians in the UK engaged in export health certification for exports of animals and animal products to non-EU countries are estimated to be EU nationals.

38. The veterinary profession is concerned that there will not be a workforce with the capability and capacity necessary to facilitate international trade. We are calling on the Government to undertake a major review of veterinary capacity to meet the demand for veterinary certification to ensure the UK has the capacity to facilitate trade post-Brexit. To alleviate labour constraints BVA has made the following calls upon Government:

- Overseas nationals graduating from UK vet schools should be allowed to live and work in the UK.
- Vets should immediately be restored to the Shortage Occupation List.
- The veterinary profession should be prioritised within future immigration policy.
- The Government should consider the economic and social impact the profession has, beyond its relatively small size.

Conclusion

39. Any future trade deal with the CPTPP countries should have the following priorities: animal health, animal welfare, public health and food safety and not undercut the leadership of

\(^{19}\) Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017
the UK Government at home and abroad in addressing the issue of anti-microbial resistance.

40. Veterinary surgeons working as official controllers at farms, food premises and other places carry out official controls (inspection and audit). In the UK, these Official Veterinarians work collaboratively with private practitioners. Based on this effective working relationship veterinarians, according to the international trade rules, can certify the import and export of animals and animal products to and from third countries. The role of veterinary surgeons in facilitating trade and protecting public health, food safety and animal welfare, is therefore recognised as essential in UK, EU and around the world.

41. If a trade deal were agreed between the UK and the CPTPP countries, the resulting increased volume of trade in products of animal origin would require a marked increase in veterinary certification. Additionally, the UK will likely be treated as a third country by the EU for the purposes of exports and imports. Therefore, we are calling on the Government to undertake a major timely review of third country certification to ensure the UK has the capacity to facilitate new trade agreements. To alleviate labour constraints BVA has made the following calls upon Government:

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