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 negotiations with the United States of America.

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 are concerns that practices utilised in the United States, would fail to meet the standards expected in the UK or across the EU. Animal welfare standards diverge significantly between the UK and United States. This divergence is acute in the field of animal welfare. The Animal Protection Index gives the UK an A grade in farm animal protections and in overall animal welfare. The US holds D grades under both indicators.²

7. There is divergence between states in the US. There is no federal legislation to protect the welfare of farm animals during rearing, resulting in a patchwork of animal welfare protection. “11 of the 50 states have passed measures aimed at limiting the use of one or more of the three most restrictive confinement systems (crates for veal calves, restrictive battery cages for laying hens and gestation crates for sows.” Which means 39 states have no measures in place.

8. Exports to the UK of chlorine-washed chicken should be excluded on animal welfare grounds. Chickens can be kept in conditions associated with poor health and welfare with chemicals used to disinfect carcasses at the end of a production process. Additionally, there are increasing public health concerns about the practice, with a recent study finding that bacilli such as listeria and salmonella remain completely active after chlorine washing. The process merely makes it impossible to culture them in the lab, giving the false impression that the chlorine washing has been effective.

9. 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.

10. 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.

11. 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.

12. 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.”

13. 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

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3 David J. Wolfson, Beyond the Law: Agribusiness and the Systematic Abuse of Animals Raised for Food or Food Production. Animal Law 2, no. 123, 1996
5 Callum J. Highmorea, Jennifer C. Warnera, Steve D. Rothwellb, Sandra A. Wilksa, C. William Keevila, Viable-but-Nonculturable Listeria monocytogenes and Salmonella enterica Serovar Thompson Induced by Chlorine Stress Remain Infectious, 2018 http://mbio.asm.org/content/9/2/e00540-18.full
6 Department for International Trade, Preparing for our future UK trade, 2017
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%.\(^7\) Increased trade with third countries will require veterinary certification in addition to this figure.

14. 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**

15. 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 consumer, worker and environmental protection in trade agreements.”\(^8\) 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.\(^9\)

16. 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.\(^10\) 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.”\(^11\)

17. A new trade agreement could allow imports that fail to meet these current high standards onto the UK market. 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.

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\(^7\) Speaking at Official Veterinarian Conference 2017, reported https://www.vettimes.co.uk/news/non-uk-vets-essential-after-brexit-says-cvo/

\(^8\) Department for International Trade, *Preparing for our future UK trade*, 2017

\(^9\) British Veterinary Association, *Preparing for our future UK trade policy: British Veterinary Association Submission*, 2017


\(^11\) 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
18. Additionally, as the Secretary of State for Environment, Food and Rural Affairs has noted, US industry producing to lower standards of health and welfare would hold a “competitive advantage” over UK farmers, undercutting UK producers on price.\(^\text{12}\)

19. 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**

20. 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.

21. 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 animals.\(^\text{13}\) 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.”\(^\text{14}\)

22. 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. Where opportunities are available to improve the welfare of farmed animals, these should be considered in all future trade deals.

23. Certain practices used in some states of the United States raise concerns on the grounds of animal welfare. Where these practices are used, which fail to meet welfare standards expected of UK producers, trade barriers should be raised. For example, we agree with the Secretary of State for Environment, Food and Rural Affairs that exports to the UK of chlorine-washed chicken should be excluded on animal welfare grounds.

“The question is welfare. We do not believe it is right that farmers who treat poultry in a less enlightened fashion than we do in the UK should secure a competitive advantage by, in essence, forcing more poultry into a smaller space. In essence, that encourages the wrong sort of approach, so we will maintain high animal welfare standards in any trade deal, and it is clear that, on that ground, we would not allow

\(^{12}\) 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


America, unless it changed its animal welfare rules, to export chlorinated chicken to this country.”

Animal Health

24. 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.

25. 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.

26. 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

27. 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.

28. 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.

Antimicrobial resistance

29. 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.”

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15 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

16 National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002


30. 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.  

31. Responsible on-farm antimicrobial use must be incorporated into future trade deals to ensure progress on responsible antimicrobial use is not undermined. Agricultural use of antimicrobials has historically been higher in the United States than the UK. As the O’Neill report notes, in the United States “more than 70 percent of medically important antibiotics are used in animals.” In the United States, there continues to be use of antimicrobials for production purposes, such as enhancing growth and feed efficiency. An EU-wide ban on the use of antibiotics as growth promoters in animal feed entered effect on January 1, 2006.

The role of vets in international trade

32. The import and export of animals and products of animal origin to third 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.”

33. 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
- meat products (e.g. cured meats, cooked meats)
- fish, shellfish and fish products
- processed animal protein for human consumption

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19 Veterinary Medicines Directorate, *Veterinary Antimicrobial Resistance and Sales Surveillance 2016*, 2017
20 The Review on Antimicrobial Resistance, Antimicrobials in agriculture and the environment - Reducing unnecessary use and waste, 2015
21 Commission of the European Communities. Ban on antibiotics as growth promoters in animal feed enters into effect (IP/05/1687)2005.
• 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

34. Additionally, any items which contain products of animal origin, may be subject to certification. Animal products are found in confectionary that uses gelatin 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.

35. 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

36. If a trade deal were agreed between the UK and the US, 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.

37. 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%.26

38. 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.

39. 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.

40. 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.

41. 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

42. Any future trade deals should have the following priorities: animal health, animal welfare, public health and food safety and not undercut the leadership of the UK Government at home and abroad in addressing the issue of anti-microbial resistance.

43. 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

26 Royal College of Veterinary Surgeons, RCVS Facts 2016, 2017
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.

44. If a trade deal were agreed between the UK and United States of America, 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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- 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.