BVA Submission to Environment, Food and Rural Affairs Committee- Brand Britain: Promoting and Marketing British food and drink inquiry

Who we are
1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 17,000 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 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.

3. Veterinary surgeons negotiate, draft and uphold necessary legislation and international standards. By carrying out surveillance and enforcement from farm-to-fork, Official Veterinarians (OVs) certify the trade in animals and animal products thus contributing to economic prosperity and the sustainability of food production. The future of the UK agri-food production is therefore of great interest and importance to the veterinary profession.

4. In our submission we consider the opportunities and challenges that exist in promoting and marketing British products abroad. Before turning closer to home to consider what can be done to encourage consumers to buy British at home.

What opportunities and challenges exist in promoting and marketing British products abroad?

5. With the UK being considered as a world leader in animal health and welfare standards and one of the top four countries globally,¹ there is much opportunity to promote and market high health and welfare British products in discerning, value-added markets. Comparatively, some other countries have less developed legal

frameworks that safeguard animal welfare. At present the UK leads the way in terms of animal welfare with its Animal Welfare Acts highlighting the five welfare needs of all animals and impacting on all farmed animals, voluntary codes of practice for welfare across species areas covering on-farm welfare, welfare during transport and welfare at slaughter, as well as highly recognisable farm assurance schemes.\(^2\)

6. In general, although it can be said that the UK does not, at present, hold a competitive advantage in terms of low cost production systems\(^3\), it could command opportunities in discerning markets with ‘Brand Britain: High animal health and welfare’ as a unique selling point. A number of studies have recorded a willingness to pay for higher animal welfare expressed by both consumers and citizens, generally in relation either to a higher value food product or to legislation to improve welfare.\(^4\) However, as the NFU’s recent report on farm animal welfare in the global context concludes ‘[…] the size of these markets is uncertain and are likely to be competitive.’\(^5\)

7. BVA 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.\(^6\) The Secretary of State for Environment, Food and Rural Affairs has stated:

“And we are uniquely fortunate that British food enjoys a reputation for quality which has been built on high animal welfare standards, strong environmental protections and the dedication of farmers and growers to meeting ever more demanding consumer expectations.”\(^7\)

8. In the context of the UK leaving the EU, there are opportunities and challenges in promoting and marketing British products abroad using this unique selling point.


\(^3\) Ibid.


\(^5\) Ibid.

\(^6\) Former Environment Secretary, Andrea Leadsom MP, speaking at NFU conference 2017, reported farming


Veterinary Certification

9. The recognition of UK excellence in animal welfare, animal health and food safety relies on veterinary surgeons and veterinary certification which provides a guarantee to consumers abroad that these standards have been met.

10. Veterinary surgeons, employed by government, work as official controllers in settings, including farms and food premises to protect animal welfare, food hygiene and safety, and public health. For every animal or animal product that is imported or exported, specially trained ‘Official Veterinarians’ certify and supervise this process to and from third countries. This allows consumers at home and abroad to have confidence in the food safety and welfare of the products they buy.

11. The World Organisation for Animal Health (OIE), a reference organisation of the World Trade Organization (WTO), 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.”

12. There are currently 1,063 Official Veterinarians authorised by the Government’s Animal and Plant Health Agency (APHA) to certify food products for export to third countries from Great Britain, and this number would need to increase significantly to accommodate the rise in certification that could happen post-Brexit. BVA is urging the Government to undertake a major timely review of third country certification to ensure we have the capacity to fulfil new trade arrangements.

Future Trade Deals

13. The Secretary of State for Environment, Food and Rural Affairs has stated:

“Whether it is pasture-fed beef or apples grown in properly tended orchards, people 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.”

14. 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.” However, there are risks attached to reaching any future trade agreements which could allow imports that fail to meet our current high standards onto the UK market.

15. For example, 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, 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 carcases at the end of a production process. We agree with the Secretary of State for Environment, Food and Rural Affairs, who has stated:

“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 forcing more poultry into a smaller space. That encourages the wrong sort of approach, so we will maintain high animal welfare standards in any trade deal, and, on that ground, we would not allow America, unless it changed its animal welfare rules, to export chlorinated chicken to this country.”

16. 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.

17. If allowed onto the UK market, these goods could become indistinguishable from UK produce. Attempts to apply multiple parallel standards within the UK market to allow lower quality imports whilst trading using the high reputation of UK produce...

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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
9 Department for International Trade, Preparing for our future UK trade, 2017
10 4 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
11 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
will lead to confusion, the opportunity for fraud, compromised animal health and welfare, and impinge consumer confidence at home and abroad.

Maintaining our legal underpinning

18. Maintaining the legal underpinning for the UK’s international reputation for animal health, welfare and food safety will require considerable effort from Government.

19. A high proportion of UK Government animal health, animal welfare and food safety policy is enacted via EU legislation in the form of either Directives or Regulations. The EU (Withdrawal) Bill will act to incorporate EU legislation into domestic law. Considerable capacity will be needed to simply ensure there are no gaps in the law on day one. As the National Audit Office notes:\textsuperscript{12}

“Defra is currently responsible for 43 of the 313 EU-related work streams identified across government – the second highest of any department. These vary in scope and scale from rewording existing EU guidance to establishing new domestic regulatory regimes.”

“Approximately 80% of Defra’s areas of responsibility are currently framed by EU legislation and 25% of EU laws apply to its sectors. It has an extensive legislative programme to prepare for EU Exit – primary legislation on agriculture and fisheries, and an estimated 95 statutory instruments to successfully convert existing EU law into UK law at the point of Exit.”

20. The UK is currently one of four countries to hold an A rating on World Animal Protection league table. This has been cited by the UK Government, and is a useful marketing tool for UK produce. Formal recognition of animal sentience is an indicator used in the methodology of this assessment.\textsuperscript{13} The Government must ensure that we enshrine the principles of animal sentience in UK law before March 2019. To fail to do this would risk weakening our global reputation for animal welfare.

Post-Brexit Agricultural Policy

21. Brexit provides the opportunity to develop a strong, competitive and innovative food industry which enjoys the confidence of customers at home and abroad. BVA has welcomed the Government recognition of animal health and welfare as public goods that will be supported within future agricultural policy post Brexit.


22. In the context of increasingly competitive markets, BVA recognises the need to ensure that the UK retains its competitive edge in terms of animal health and welfare. With this in mind, we recognise that it is not sufficient to solely carry out a tick-box exercise in terms of basic inputs within production systems. Instead, the UK should look to incorporate an outcomes-based approach, with evidence-based welfare outcomes safeguards, allowing for the continuous improvement of animal management and husbandry practices.

23. The standardised assessment of welfare outcomes provides a practical and scientifically informed method of assessment that aims to provide a more objective, accurate and direct picture of animal welfare that would keep the UK at the forefront of animal health and welfare globally. Indicators of positive welfare should be incorporated in to welfare outcome assessments when possible, as promoted by the Farm Animal Welfare Committee (FAWC)’s “good life” framework. Behavioural opportunity for animals can be a key differentiator between some assurance schemes, which is linked to the potential for good animal health and welfare when delivered with excellent health and welfare outcomes.

24. A welfare outcome safeguards approach also contributes to informed considerations of the advantages and disadvantages of different production systems, assisting producers and consumers to consider how well a production system holistically meets all of an animal’s health and welfare needs. It is important to avoid oversimplification when considering how different production systems address animal health and welfare needs and recognise that welfare outcomes are not solely dependent on the type or size of different production systems.

25. If the UK government seized the opportunity to implement a farm animal welfare stewardship programme, providing financial support for animal welfare as a public good and focussing on health and welfare that is evidence-based, with welfare outcomes safeguards, this could represent another unique selling point for Brand Britain when marketing British products abroad.

Non-stun products

26. We do not support the marketing or export of British non-stun animal-derived products abroad. Fundamentally, we would oppose any increase of non-stun meat within the export market. Our view is that all animals should be stunned before slaughter to render them insensible to pain. We therefore emphasise that marketing British non-stun animal derived food products abroad is not in the spirit of the current derogation in Welfare of Animals at the Time of Killing regulations for

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14 British Veterinary Association, Policy position: non-stun slaughter, 2017
non-stun slaughter. This derogation is intended to enable the provision of food in accordance with religious rites for specific communities in the UK.

What can be done to encourage consumers to buy British at home?

27. BVA believes that there is work to be done in communicating the value of improved animal health and welfare, high animal health and welfare UK products and of UK farm assurance schemes in achieving this, to producers, farmers, citizens, retailers and others. Effective communications surrounding these areas is crucial so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood.

28. The veterinary profession has a key role to play in informing and educating the public about the value and provenance of animal derived food. As such, BVA has a responsibility to assist members to understand different farm assurance schemes and to signpost the public, in a professional and ethically justifiable way, towards those that promote higher animal health and welfare.

29. In the BVA position on farm assurance schemes, we recognise the integral role farm assurance schemes play in supporting the implementation of the UK’s high animal health and welfare practices and standards.

30. Further, we also set out seven guiding principles for individuals considering their own approach to the selection of UK animal derived products. As part of these principles, we recognise that there will be individual priorities that will be important to different individuals; as such BVA and the veterinary profession’s role is to highlight important considerations relating to animal health, welfare and environmental stewardship to assist with purchasing decisions.

31. Whilst these priorities are considered within the context of UK farm assurance schemes, as principles they can also be held up against farm assurance schemes in the international arena. These principles are:

32. Lifetime assurance – BVA believes that all farm assurance schemes should cover the health and welfare of the animal from birth to slaughter, known as ‘farm to fork’. Whilst all farm assurance schemes play an integral role in promoting higher standards of animal health and welfare, we believe that all animals should have a good life from point of birth, as well as a humane death.

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15 HM Government, Welfare of Animals at the Time of Killing

16 British Veterinary Association, Farm assurance schemes, 2017
33. Welfare at slaughter – BVA believes that all animals should be stunned before slaughter, and as close to the point of production as possible. If slaughter without stunning is still to be permitted, then any meat or fish from this source must be clearly labelled so that consumers can fully understand the choice they are making when purchasing such products. Consumers should consider whether the scheme requires pre-stunning, and what requirements, if any, there are in relation to transport to slaughter.

34. Veterinary involvement – Expert input and advice from the veterinary profession in the development, implementation, and continuous review and improvement of farm assurance schemes is crucial to the value of those schemes in terms of animal health and welfare, public confidence, and producer/farmer buy-in. Consumers may wish to consider whether the scheme is independently certified, underpinned by veterinary expertise, and committed to continuous improvement.

35. Behavioural opportunity – The ability to perform certain behaviours can be important for achieving good animal welfare, and frustrating highly motivated behaviour can result in compromised welfare. In production systems where behavioural opportunities December 2017 are reduced, there are often trade-offs with other welfare and production outcomes. On-farm welfare outcome assessment is important in assuring that systems are balancing the ability to perform important behaviours with good health outcomes. Behavioural restriction is an important concern for many consumers.

36. Responsible use of antimicrobials and other medicines – BVA strives for responsible prescribing and responsible use of veterinary medicines across the profession, industry, and in the wider context of One Health. A reduction in the use of antimicrobials in animals can be achieved through improvements to animal health and welfare via disease prevention strategies, including improved animal husbandry and management. Consumers are encouraged to consider whether the scheme supports responsible use of antimicrobials, and what requirements are incorporated to help prevent the need for prescribing.

37. Animal health and biosecurity – biosecurity and measures taken to prevent the spread of disease amongst animals, humans and their surroundings are a crucial contributor to the high animal health and welfare of farm animals, as well the UK’s biosecurity and food safety as a whole. Consumers are encouraged to consider how the scheme promotes effective biosecurity measures and the reduction of disease risks, in collaboration with a veterinary surgeon.

38. Approach to sustainability and the environment – consumers are encouraged to explore how the scheme incorporates elements of environmental stewardship, such as carbon footprint and conservation of biodiversity.
39. BVA has also produced a poster that sets out whether the UK’s leading farm assurance schemes address each of these individual priorities. Publication is expected in summer 2018.

40. With these outputs in mind, we would welcome an information campaign that promotes the value of UK farm assurance schemes, and encourages the consumer to consider the provenance of UK-derived food products. Consideration could also be given to highlighting the way in which the UK’s legal framework leads the way in terms of international welfare requirements and voluntary welfare codes of practice.

41. From a long-term perspective, consideration should be given to educating consumer, as citizens, from a young age as to the value and provenance of animal-derived food, and how to make sustainable, ethically informed choices about the high animal health and welfare products produced in the UK.

Improved clarity of food labelling

42. Ensuring that UK consumers understand the provenance of UK food products through improved clarity of labelling will enable consumers to make more informed, transparent choices as to how their meat or dairy products were produced. At present, we are concerned that the voluntary food labelling system is confusing for consumers and consumers may struggle to understand how this labelling links to the outcomes from specific farm systems. We believe that improved transparency of labelling would therefore incentivise UK consumers to ‘buy British’.

Mandatory method of slaughter labelling: ‘stun’ or ‘non-stun’

43. BVA is clear in its position that all animals should be stunned before slaughter. If slaughter without stunning is still to be permitted, as set out under the current derogation in Welfare of Animals at the Time of Killing regulations for non-stun slaughter, then any meat or fish from this source must be clearly labelled. BVA therefore supports a mandatory method of slaughter labelling system which clearly outlines if products are ‘stun’ or ‘non-stun’ to enable consumers to fully understand the choice they are making when purchasing such products.

Mandatory method of production food labelling

44. In addition, we would support a mandatory method of production food labelling system, which should include requirements relating to animal welfare outcome safeguards. Such a system would have the potential to enhance marketplace opportunities for farmers by avoiding oversimplification when UK consumers consider how different production systems address animal health and welfare needs. Ultimately, this would help further public understanding that that welfare outcomes are not solely dependent on the type or size of different production
systems and help consumers to better identify UK food products produced in systems that are associated with better animal welfare outcomes.

Conclusion

45. Today, the UK is considered as a world leader in animal health, animal welfare and food safety. The exit of the UK from the EU presents opportunities and challenges in promoting and marketing British products abroad based on the reputation to meet these high standards. Government and industry need to take steps to minimise the potential risks and take advantage of opportunities. The veterinary profession will play a key role in meeting these standards and certifying they have been met providing confidence for foreign and domestic markets.

46. More can be done to encourage consumers to buy British at home and effectively communicate the value of improved animal health and welfare, high animal health and welfare UK products and of UK farm assurance schemes in achieving this. Effective communications surrounding these areas is crucial so that the links between investment, good health and welfare outcomes (for animals and farmers) and economic returns are understood. The veterinary profession has a key role to play in informing and educating the public regarding the value and provenance of animal derived food and we look forward to feeding into any future government-led communications initiatives in this area.

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