International Trade Select Committee
UK-US trade relations inquiry:
British Veterinary Association Submission

1 INTRODUCTION

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 16,000 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.

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.

We welcome the opportunity to provide a submission to this inquiry which explores UK-US trade relations. In drafting our submission, we have drawn on the expertise of BVA specialist divisions, representing veterinary surgeons in different specialisms across the UK. Our branches in Scotland, Wales and Northern Ireland have also provided their insights.

International trade in animals and animal products depends on a combination of factors which should be considered to ensure unimpeded 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 established and maintained as a unique selling point for the UK.

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.

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.”

For the Government to implement this approach the role of the veterinary surgeon in facilitating international trade must be recognised and supported. The demand of veterinary certification is

1 Department for International Trade, Preparing for our future UK trade, 2017
increasing and will grow significantly following exit from the EU. Nigel Gibbens, Chief Veterinary Officer UK, has suggested that this could lead to the volume of products requiring veterinary export health certification increasing by up to 325%.\(^2\)

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 UK-US trade relationship. 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.

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, the UK should uphold these standards in all trade negotiations.

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. The Animal Protection Index gives the UK an A grade in farm animal protections and in overall animal welfare. The US holds a D grade holds D grades under both indicators.\(^3\)

There is also divergence between states in the US. There is no federal legislation to protect the welfare of farm animals during rearing,\(^4\) 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).”\(^5\) Which means 39 states have no measures in place.

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 UK farming, food industry, animal welfare and consumer interests.

## 2 Veterinary certification

The import and export of animals and products of animal origin to third countries, including the United States, 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:

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“A certificate, issued in accordance with Chapter 5.2 [of the Terrestrial Animal Health Code6], describing the animal health and public health requirements that are fulfilled by the exported commodities.”7

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
- 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

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, for example plastic bags that are made using stearic acid derived from animal fat.

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

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(http://www.oie.int/index.php?id=169&L=0&htmfile=chapitre_certification_procedures.htm#chapitre_certification_procedures)

(http://www.oie.int/index.php?id=169&L=0&htmfile=glossaire.htm)
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.”

### 2.1 Veterinary Certification and a Potential UK-US Trade Deal

If a trade deal were agreed between the UK and United States, the resulting increased volume of trade in products of animal origin would require a marked increase in veterinary certification. The United States is already the UK’s largest food and agricultural trading partner outside the EU for both exports and imports. In 2016, imports of goods from the United States requiring veterinary certification were worth £475,058,988; exports from the UK to the United States totalled £337,742,565.

There are no detailed economic analyses of any potential UK-US trade deal. However, a 2014 analysis commissioned by the European Parliament’s Committee on Agriculture and Rural Development assessed the potential impact of a trade deal between the EU and the United States. The analysis found a 25% reduction in non-tariff measures and a full phasing out of tariff protection would result in increased additional transatlantic trade in the agri-food sector. EU exports to the US would increase by about 60% and EU imports from the US increase by about 120% up to 2025.

### 2.1 Veterinary Certification and a New UK-EU Trade Relationship

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. Should the UK neither become a non-EU EEA country nor enter a customs union with the EU, administrative checks would apply to UK imports from and exports to the EU as currently apply to trade with non-EU countries. This is likely to be the case whether UK trade with the EU is conducted under a Free Trade Agreement or under WTO rules.

All products of animal origin imported from a third country are subjected to documentary checks, an assessment of the common veterinary entry document public and animal health certificates and accompanying commercial documentation. Rules of origin also apply to third country agricultural imports. In contrast, imports or exports of animal products within the Single Market can simply be accompanied by a commercial document, with details of the contents of the consignment, sender and recipient.

Consequently, post Brexit there will be increased demand for veterinary certification and supervision. The scale of this increase is uncertain. However, Nigel Gibbens, Chief Veterinary Officer UK, has indicated the volume of products requiring veterinary export health certification could increase substantially in the event of no deal being reached between the UK and EU. He has suggested this

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9 House of Commons Library Briefing Paper Number 7974, Brexit: Agriculture and Trade 2017

10 BVA analysis using HMRC data.

increase could be as much as 325%. Ensuring the veterinary profession has the capacity to meet this demand will be essential to allowing continued trade.

3 CAPACITY TO MEET VETERINARY CERTIFICATION

Fulfilling demand for veterinary surgeons, following the departure of the UK from the EU, will be critical to trade. In the short to medium term, it will be impossible to meet this demand with UK nationals. Any increase in UK veterinary students may be a long term and gradual position but there is a significant risk that this will leave the profession with an acute workforce shortage in the short term.

The Government must ensure that an appropriate number of veterinary surgeons can be recruited from overseas, whether from the European Union or from outside the EU, to facilitate new trading relationships. As the House of Lords European Union Committee noted in the report Brexit: farm animal welfare:

“Veterinarians play a key role in ensuring and inspecting farm animal health and welfare in the UK from farm to abattoir. They also play an important role in certifying animals in the context of trade. We note the overwhelming reliance on non-UK EU citizens to fill crucial official veterinary positions in the UK, and call on the Government to ensure that the industry is able to retain or recruit qualified staff to fill these roles post-Brexit.”

Statistics provided by the Royal College of Veterinary Surgeons (RCVS) reveal the dependence of the UK on non-UK EU vets. RCVS currently registers around 1,000 overseas vets per year, of which non-UK EU nationals make up the clear majority. In both 2015 and 2016, RCVS registered more non-UK EU vets than UK graduates.

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14 Information provided by Royal College of Veterinary Surgeons
EU veterinary surgeons make a particularly strong contribution to public health-critical roles, who are indispensable for trading purposes. Estimates suggest 95% of Official Veterinarians (OVs) who are responsible for verifying and auditing meat hygiene in abattoirs graduated overseas with the clear majority of these being non-UK EU graduates.

OVs also minimise the risk of food fraud, promote animal welfare and provide public health reassurance to consumers at home and overseas. There are significant concerns within the meat processing industry about the potential impact of a post Brexit veterinary workforce shortage on the UK agri-food sector which would impact on the UK’s ability to meet its international animal health, public health, and animal welfare obligations and that could jeopardise trade.

As noted above, following Brexit, there will be increased demand for veterinary certification and supervision, which would require more OVs than are currently employed in the sector. As the Institute for Government notes: “If the UK is required to undertake checks on animal produce coming from the EU, it will need an increase in the number of vets.”

When veterinary surgeons are required more than ever, non-UK EU vets are facing considerable uncertainty about their futures. We have called on the Government to guarantee working rights for non-British EU vets and veterinary nurses currently working and studying in the UK.

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In the months following the UK’s decision to leave the EU, there was a reduction in the numbers of EU graduated vets registering to work in the UK. This contradicts the trend, which had seen a steady increase in the numbers of vets from elsewhere in the EU.

To protect the trade in animals and animal products, priority must be given to the veterinary profession. As the Government response to the EU Energy and Environment Sub-Committee report Brexit: Farm Animal Welfare notes:

“Many vets working in the UK are EU nationals, including those filling Official Veterinary positions, and the Prime Minister has made clear that securing the status of the veterinary workforce is a top priority.”

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 third country certification to ensure the UK has the capacity to facilitate new trade agreements, including any potential UK-US trade deal.

4 Objectives for a Future UK-US Trade Deal

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.” 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

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17 Department for International Trade, Preparing for our future UK trade, 2017
expanded to explicitly include public goods: animal health; animal welfare; public health (including food safety); and responsible use of antimicrobials.  

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:

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.”

A UK-US 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. 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.

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.

A. ANIMAL WELFARE

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. The UK should promote good animal welfare as an important sustainable development goal. Trade acts as a means to achieving this.

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. However future trade deals may undermine these values. The House of Lords European Union Committee noted

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18 British Veterinary Association, Preparing for our future UK trade policy: British Veterinary Association Submission, 2017
20 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
21 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
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.”

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

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

B. ANIMAL HEALTH

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.

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.

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.

C. PUBLIC HEALTH INCLUDING FOOD SAFETY

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

24 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
25 National Audit Office, The 2001 Outbreak of Foot and Mouth Disease, 2002
humans varies from mild symptoms to life-threatening conditions. Among emerging infectious diseases, 75% are zoonotic.26

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.

D. **Antimicrobial Resistance**

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.”

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. 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.”29 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, 2006.30

5 **Conclusion**

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

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28 Veterinary Medicines Directorate, Veterinary Antimicrobial Resistance and Sales Surveillance 2016, 2017

29 The Review on Antimicrobial Resistance, Antimicrobials in agriculture and the environment - Reducing unnecessary use and waste, 2015

30 Commission of the European Communities. Ban on antibiotics as growth promoters in animal feed enters into effect (IP/05/1687)2005.
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.

If a trade deal were agreed between the UK and United States, 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.

Any future trade deal with the United States should have the following objectives: 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.

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