

27 July 2020

Australia-UK FTA Coordinator
Regional Trade Agreements Division
Department of Foreign Affairs and Trade
RG Casey Building, John McEwen Crescent
BARTON ACT 0221
Via email: ukfta@dfat.gov.au



To whom it may concern,

World Animal Protection welcomes the opportunity to make a submission on the opportunities and potential impacts of a free trade agreement (FTA) between the United Kingdom and Australia. Based on our experience and expertise, we will be restricting our comments to those areas that relate to animal welfare and sustainability.

Animal welfare is an important element to consider in any trade agreement. We note that one of the stated objectives of the Australian Government in negotiating this FTA is trade and sustainable development. Animal welfare is a relevant consideration for the goal of sustainable development. This agreement presents a unique opportunity to demonstrate Australia's credentials by taking a strong stand to promote animal welfare and environmental sustainability in agriculture.

1. Animal sentience and welfare standards

World Animal Protection would encourage the Australian Government to look to the example set by the animal welfare provisions in the draft FTA between the UK and the EU. Article 6.11 of this document begins by recognising animal sentience, a crucial first step in establishing strong animal welfare principles.¹ The agreement proceeds to call on the parties to work towards achieving best practices in animal

¹ DRAFT WORKING TEXT FOR A COMPREHENSIVE FREE TRADE AGREEMENT BETWEEN THE UNITED KINGDOM AND THE EUROPEAN UNION, article 6.11, page 76-77.

welfare by broadening the scope of OIE guidelines.² We believe these articles are a good place to start and encourage the Australian Government to include similar wording.

However, we would encourage the Australian Government to go a step further by requiring that in the event of different animal welfare standards between Australia and the UK, the higher of the two standards become the required standard under the FTA. We would be concerned that without such a requirement, this FTA could potentially result in a lowering of animal welfare standards in the UK or Australia. We have already seen concerns raised by farmers in the UK who do not want to see their animal welfare standards being undercut by Australian imports.³

2. Antimicrobial resistance

One of the most significant challenges of our time is the issue of antimicrobial resistance (AMR).⁴ This issue is closely related to animal welfare given the extensive use of antibiotics on farmed animals and is relevant to the broader goal of the Government regarding trade and sustainable development. As with animal welfare, World Animal Protection would encourage the Australian Government to look to examples provided by the draft EU/UK FTA when determining provisions on AMR. Article 6.10 calls for cooperation on the issue of AMR.⁵ In particular 6.10(2) and (3) provide a good foundation for addressing the issue of AMR in a trade context.

(2) The Parties recognise that anti-microbial resistance is a serious threat to human and animal health. Misuse of anti-microbials in animal production, including non-therapeutic use, can contribute to anti-microbial resistance that may represent a risk to human life. The Parties recognise that the nature of

² DRAFT WORKING TEXT FOR A COMPREHENSIVE FREE TRADE AGREEMENT BETWEEN THE UNITED KINGDOM AND THE EUROPEAN UNION, article 6.11, page 76-77.

³ *Battle lines drawn over farming as UK and Australia negotiate free trade agreement*

ABC Online, < <https://www.abc.net.au/news/2020-07-15/uk-free-trade-youtube-video/12458408?nw=0> > (accessed 27th July 2020).

⁴ World Animal Protection, *US Pork and the superbug crisis: how higher welfare farming is better for pigs and people* (2019), 1. https://www.worldanimalprotection.ca/sites/default/files/media/ca_-_en_files/final_wap_us_pork_report_11_2019_-_canada.pdf

⁵ DRAFT WORKING TEXT FOR A COMPREHENSIVE FREE TRADE AGREEMENT BETWEEN THE UNITED KINGDOM AND THE EUROPEAN UNION, article 6.10, page 76.

the threat requires a transnational and One Health approach. (3) The Parties shall cooperate internationally to reduce the unnecessary use of anti-microbials in animal production and to phase out their use internationally as growth promoters with the aim to combat anti-microbial resistance in line with the One Health approach, and in compliance with the Global Action Plan.⁶

As with the animal welfare position, we would urge the Government to support a position whereby the highest standard between the two negotiating parties is adopted as the required standard in the FTA. This should be used as a point from which to work cooperatively to further improve standards to help limit the threat from AMR as a result of the overuse of antibiotics on farms.

3. Liberal rules of origin

World Animal Protection notes that one of the stated objectives of the negotiation of this FTA is to support a liberal approach to rules of origin. While we understand that modern production methods can lead to complexities around labelling, we would be concerned if animal products lacked clear country of origin labelling. Due to differing animal welfare standards, as well as differing standards around labour laws, antibiotic use and other key issues, it's critical that consumers know where their meat has come from, so they can make an informed purchasing decision. We note that under current labelling standards in Australia, there is a lack of clarity around the country of origin of imported pork products, which means consumers are not informed whether their bacon or ham was sourced from the EU, where welfare standards are relatively high, or from North America, where animal welfare standards are low and prophylactic antibiotic use is common. We would have serious concerns if this FTA sought to allow similarly vague labelling for products covered by its remit. We encourage the Government to take steps to balance the complexities around production and country of origin, with a consumer's right to know where their food (particularly if it's animal-based), has come from.

⁶ DRAFT WORKING TEXT FOR A COMPREHENSIVE FREE TRADE AGREEMENT BETWEEN THE UNITED KINGDOM AND THE EUROPEAN UNION, article 6.10, page 76.

We thank you once again for the opportunity to be involved in this process. We are available for comment if any further information is required to clarify the positions in our submission. We would also like to be kept informed of any future consultation opportunities. With offices based in both Australia and London, we are well placed to help provide input on relevant animal welfare standards and guidelines, in order to help achieve your objectives around sustainable development.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simone Clarke'. The signature is fluid and cursive, with the first name 'Simone' written in a larger, more prominent script than the last name 'Clarke'.

Simone Clarke
Executive Director
World Animal Protection Australia