

# BVA response to Department for Business and Trade open consultation on Trade with Türkiye

19 December 2023

## Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,500 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) We welcome the opportunity to contribute to the call for input on the UK free trade agreement with Türkiye. Our key asks and concerns relate to Sanitary and Phytosanitary Measures (SPS) and animal welfare.

## Sanitary and Phytosanitary Measures (SPS)

- 3) The Department for Business and Trade's information note for the call for input on a new free trade agreement between the United Kingdom and Türkiye includes the following reference to SPS measures:

*"The current UK-Turkey Trade Agreement has a very minimalist SPS chapter which only restates the Parties' international obligations under the WTO SPS Agreement. It has no substantive commitments. It does not include provisions on cooperation on animal welfare."*

- 4) SPS measures form a vital part of the UK's biosecurity framework and should not be seen solely as a barrier to trade that needs to be overcome. They serve a vital purpose: ensuring the maintenance of public and animal health through effective disease surveillance and control. The consequences of failing to map out and implement a comprehensive SPS agreement in the trade deals we sign could be catastrophic to multiple sectors of the UK's economy. SPS measures also provide positive benefits to our UK Export trade by providing the assurance of animal / public health necessary for allowing access to other markets for our genetics, live animals (for breeding), and meat.
- 5) It was confirmed in March 2023 that cases of Foot and Mouth Disease (FMD) were found in Türkiye and a few other countries in the Middle East. From recent history the UK is well aware of the disastrous impact that a FMD outbreak can have on the country with millions of animals slaughtered costing billions in damages. This cannot be allowed to happen again so we must ensure our SPS measures are stringent and effective.
- 6) The great majority of new free trade agreements (FTAs) that the UK has signed now contain provisions seeking to simplify SPS trade requirements. The UK-Japan deal looked to simplify these measures when it was rolled over from the EU-Japan agreement. SPS was a key issue included in the UK-Australia deal whereby the UK retains the ability to ban goods based on animal or public health grounds. The UK-New Zealand trade deal also included a guarantee on maintaining the standards of both nations when it comes to food safety and biosecurity standards.
- 7) We would expect to see something similar included in a future free trade agreement with Türkiye. There are a number of plant and animal goods that may be imported in greater numbers once the existing tariff rate quotas are removed, such as sheep and turkey meat as well as cheese and certain vegetables. It is vital that a robust SPS system is in place to assure the animal health, provenance and traceability of such products and thus to ensure the biosecurity of both nations.

## Animal Welfare

- 8) It is essential that the UK must safeguard its high reputation for animal health, animal welfare, and food safety. In all trade agreements it negotiates, the Government must only grant tariff-free access to agricultural goods where there is full equivalence with core standards of animal health, animal welfare, public health and food safety and responsible antibiotic use.
- 9) It is our view that FTAs should commit all parties to promote cooperation on welfare standards and be supportive of future research on animal welfare standards. Trading partners should also promote

and maintain food safety standards to the level of the country with the higher standards, it should be an ongoing conversation between both countries on how they can better support animal welfare and food safety standards in food production and trade.

- 10) Although Türkiye has legislation in place to align it more closely with EU animal welfare standards, there are limited animal welfare protections for farm animals under the law. In secondary regulations on the rearing of calves and chickens, there is little mention of animal welfare and no prohibited acts are included in the regulations. We do not think that the UK should be liberalising trade on products that are produced under conditions of animal welfare which are far below our own. This is for two key reasons, one being the UK has worked hard to achieve its status as a world leader when it comes to animal welfare. We risk irreparably damaging that reputation as we consistently fail to take a stand on animal welfare disparities in the trade agreements we sign. The second reason is the impact on our farmers, who have higher costs of maintaining our high standards, as they have to compete with farmers that have produce that has been raised through cheaper animal husbandry practices under lower animal welfare standards.
- 11) We would expect the UK to encourage all trading partners to work towards equivalence on animal welfare standards in food production but appreciate the challenges around asking other countries to change their animal husbandry practices to accommodate this. We would therefore expect as a bare minimum that a standalone chapter on animal welfare is included in the FTA with Türkiye with a non-regression commitment for both sides on animal welfare standards, similar to the chapters included in the trade agreements signed with New Zealand and Australia. This chapter should commit both the UK and Türkiye to discuss animal welfare and how conditions could be improved in both countries as a part of ongoing trade negotiations. Although the chapters are not comprehensive, they are a positive step in the right direction when it comes to supporting a set of standards in relation to animal welfare in trade and we want to see this replicated in any further FTAs that the UK might sign before opening up its internal market to other countries.
- 12) The UK is a world leader when it comes to animal welfare regulations and the quality of the animal produce which it in turn exports so we should be using that reputation and influence to start the conversation with other countries about raising their standards to the levels we see in this country.

### Vet involvement

- 13) UK production meets the highest standards of animal health, animal welfare and food safety thanks to veterinary surgeons who deploy their expertise across domestic food production, from farm to fork. They also play a unique role in international trade providing assurance to trading partners. Veterinary advice and involvement at all stages of negotiations is essential to facilitate acceptable trade.
- 14) We must emphasise how crucial it is that vets are involved in the trade negotiation process as early as possible to ensure that food safety, animal health and welfare concerns remain a key consideration in any trade deals that are signed. Vets will also be critical in the drawing up and implementation of SPS measures and we would welcome the opportunity to feed into these discussions.