



Animal Welfare in the Proposed Australian Trade Deal The risks and the results

This briefing has been prepared by the Trade & Animal Welfare Coalition (TAWC) UK as a tool to understand the animal welfare issues surrounding the Australia-UK trade deal.

Animal Protection Index Ratings¹

Animal Welfare UK - B

Farm Standards UK - D

Animal Welfare Australia - D

Farm Standards Australia - E

Possible risks to animal welfare from the deal:

- No conditions on tariff liberalisation
- Incentive to maintain unsustainable model of productions
- Impact on wildlife (pressure on biodiversity from the ruminant industry in Australia)
- Weak animal welfare cooperation provisions
- SPS Chapter: No recognition of the precautionary principle or of the right of the UK to uphold existing import bans based on animal health, but also benefiting animal welfare

The Government has a manifesto commitment not to lower animal welfare standards in any FTAs. Additionally, the Department of International Trade has confirmed that it would not lower food, animal welfare or environmental standards after the UK left the EU and that, when undertaking trade deals, any imported product would have to meet UK standards.² Yet, it is important to remember that most UK animal welfare standards - all apart from rules on welfare at the time of slaughter - do not apply to imports. Therefore, unconditional trade liberalisation can create an increase of lower welfare imports, putting pressure on UK producers and on UK standards in the longer term. The tables presented below set out what the UK needs to do to ensure the UK-Australia FTA does not negatively impact UK animal welfare standards, and even serves as a springboard to promote higher animal welfare in Australia.

The UK has numerous laws on production systems, slaughter and transport rules which should serve as a basis to condition trade preferences. The UK imports relevant quantities of ruminant meat from Australia (cattle and sheep), as well as wool (although these imports are already duty-free). The UK imported 560 tonnes of beef and veal worth £4.1m from Australia last year, as well as 8,500 tonnes of lamb and mutton worth £45.8m, according to HMRC figures.³ These sectors see significant opportunities to increase their exports to the UK in the case of a liberalisation of trade.⁴

¹ <https://api.worldanimalprotection.org/#>

² <https://questions-statements.parliament.uk/written-questions/detail/2021-01-21/141629>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984906/OTS_Release_032021.pdf

⁴ <https://www.ft.com/content/d3921d7c-985f-44eb-a432-4dfb0035f469>

Situation in the UK	Situation in Australia	Recommendations
Ruminant Meat (cattle, lamb and sheep)		
Banned under UK legislation / Allowed in imported Goods		
<p>While being reviewed, at present, UK laws impose a maximum journey time of 28 hours for beef cattle and sheep with a 1 hour rest in between each 14 hours.</p> <p>The UK does not have yet a species-specific legislation but productions must respect the Code of Recommendation for the Welfare of Livestock:Cattle⁵</p>	<p>Australian cattle and sheep can be transported for 48h without food or water.</p> <p>A proportion of Australian beef cattle are produced in feedlots and whilst the figure of 4% of the cattle population is used this does not cover the amount who spend at least part of their lives with zero grazing. This system of zero grazing does not occur in the UK. Welfare of cattle on feedlots is seriously harmed and these systems do not respect most of the criteria expressed in the UK Welfare Code.⁶</p>	<p>The UK needs to condition the granting of further trade preferences to the respect of UK-equivalent transport legislation.</p> <p>The UK should impose that further market access will only be granted to meat derived from grass-fed cattle.</p>
Banned under UK legislation, also for imported Goods		
<p>UK standards on welfare at the time of slaughter apply to imported meat.⁷</p> <p>The UK has banned the import of meat derived from hormone-fed beef.</p>	<p>There is no compulsory CCTV in abattoirs and no Model Conditions for animal welfare. Standards are lower in Australia on the level of training required for auditors and those working in abattoirs and animal welfare is not prioritised as an objective of Australia's export legislation.</p> <p>Australia permits the use of hormones, which is relied upon in around 40% of cattle farmed for beef production.</p>	<p>The UK needs to ensure meat is imported from animals slaughtered in UK approved abattoirs, and to properly audit these abattoirs, specifically on animal welfare standards.</p> <p>The UK must not withdraw hormone and antibiotic-related unilateral measures. It should even strive to get a commitment from Australia to phase out the use of</p>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69368/pb7949-cattle-code-030407.pdf

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69368/pb7949-cattle-code-030407.pdf

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955031/welfare-animals-time-of-killing-regs-2015-post-implementation-review.pdf

		these products.
The mulesing of sheep is banned in the UK.	<p>In Australia, 66% sheep population is of merino breed and 34% xbreed or other breed (eg Border Leicester). Lambs for export are bred from pure-bred merino and cross breed merino which tend to be mulesed. Only non-merino sheep are not mulesed.</p> <p>Mulesing is thus also an issue in relation to the trade in sheep meat.</p> <p>44% of all Australian sheep are still mulesed without anaesthetic and an additional 40% with pain relief.</p>	The UK should not grant further trade preferences to Australian sheep meat, unless it respects UK-equivalent standards, and is thus derived from non-mulesed animals.

The UK does not import much of the following products directly from Australia yet, however, trade agreements are made to last and trade liberalisation can modify trade patterns. In addition, the UK intends to improve its standards in the near future. It is thus important to include animal welfare-based conditions in new trade preferences.

Situation in the UK	Situation in Australia	Recommendations
Eggs and Egg products (Laying Hens)		
Banned under UK legislation / Allowed in imported Goods		
<p>Use of conventional barren battery cages is banned in the UK</p> <p>The UK has a baseline stocking density of 750sq cm per hen.</p>	<p>An estimated 9 million laying hens in Australia – 70 per cent of the country's egg-laying flock are confined to tiny barren battery cages.⁸ There is an ongoing process to review the minimum standards for poultry, but there are no substantial plans to ban battery cages.</p> <p>Australia has a baseline stocking density of 550sq cm per hen (cage)</p>	If Australia is granted preferential tariffs on eggs or egg products, it should come with the obligation to respect animal welfare standards equivalent to those applied in the UK.

⁸ <https://www.independent.co.uk/news/uk/politics/rspca-farmers-brexit-australia-mulesing-b1850143.html#r3z-addoor>

Banned under UK legislation, also for imported Goods		
In the UK, the use of antibiotic growth promoters, ionophore antibiotics as growth promoters is banned, as well as routine antibiotic use, including all preventative group treatments, are banned in egg production.	Antibiotic use per animal in Australian poultry is over 16 times higher than in the UK.	The UK should include provisions on cooperation around antimicrobial resistance, including commitments to reduce antimicrobial use.
Pig meat (pigs and sows)		
Banned under UK legislation / Allowed in imported Goods		
Use of sow stalls has been banned in the UK. Tail docking is restricted in the UK The UK has the highest percentage of pigs on some straw: around 60% of weaned pigs and 40% of pigs being outdoor	Australia has not yet moved towards banning sow stalls; rather the current Code of Practice (adopted by some states) has restricted the use of sow stalls to 6 weeks of each pregnancy since 2017. A voluntary (total) phase out has been proposed by the industry, but an estimated 10 to 20% of pig farmers are still using stalls. The Australia Model Code of Practice for the Welfare of Animals: Pigs ⁹ suggests that where tail docking is performed as a routine preventative measure, it should be carried out before pigs are 7 days of age. It is estimated that 88% of pigs raised in Australia are tail docked. ¹⁰ In Australia, 90% of pigs are reared indoors and 5% outdoors.	If tariffs on pig meat are reduced, it should only be for imports of pig meat produced to UK-equivalent standards.
Banned under UK legislation, also for imported Goods		

⁹ <http://australianpork.com.au/wp-content/uploads/2017/05/MCOP.pdf>

¹⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7552632/>

<p>In the UK, the use of antibiotic growth promoters, ionophore antibiotics as growth promoters is banned, as well as routine antibiotic use, including all preventative group treatments, are banned in pig meat production.</p> <p>The UK has a 23 year ban on the use of the drug ractopamine (a growth promoter), and the import or sale of any pig meat containing this 'yield-enhancing' drug.</p>	<p>Antibiotic use per animal in Australian pigs is nearly three times higher in Australian pig productions.¹¹</p> <p>Ractopamine is used in the pig industry in Australia.</p>	<p>The UK should include provisions on cooperation around antimicrobial resistance, including commitments to reduce antimicrobial use.</p> <p>The UK should not withdraw its unilateral ban on imports produced with ractopamine.</p>
<p>Chicken meat (broiler chicken)</p>		
<p>Banned under UK legislation / Allowed in imported Goods</p>		
<p>Maximum stocking density in Great Britain is 38kg/m² under the Schedule 5a of Welfare of Farmed Animals (England) (Amendment) Regulations 2010. The RSPCA Assured UK standard is 30kg/m²¹²</p>	<p>Australian broiler stocking density is up to 40kg/sqm. RSPCA Australia standards (34 kg/sqm) cover 78% of chicken flock.</p> <p>Even those chickens now raised 'free-range' (as consumer demand has increased) will usually only have access to an outdoor area for up to half their short lives, as they are kept indoors until feathered.</p>	<p>If tariffs on chicken meat are reduced, it should only be for imports of meat produced to UK-equivalent standards.</p>
<p>Banned under UK legislation, also for imported Goods</p>		
<p>In the UK, the use of antibiotic growth promoters, ionophore antibiotics as growth promoters is banned, as well as routine antibiotic use, including all preventative group treatments, are banned in chicken meat production.</p> <p>Chlorine or acid-washed poultry is banned in the UK market.</p>	<p>Antibiotic use per animal in Australian poultry is over 16 times higher than in the UK.</p> <p>Some chicken processing plants in Australia use chlorine to wash their chicken meat</p>	<p>The UK should include provisions on cooperation around antimicrobial resistance, including commitments to reduce antimicrobial use.</p> <p>The UK should not withdraw its unilateral ban on chlorine or acid-washed chicken meat.</p>

¹¹<https://www.saveourantibiotics.org/media/1864/farm-antibiotics-and-trade-could-uk-standards-be-undermined-asa-nov-2020.pdf>

¹²<https://www.rspcaassured.org.uk/frequently-asked-questions/red-tractor-enhanced-welfare/#:~:text=chickens%20to%20be%20housed%20in,2%20kg%20per%20square%20metre>

What is needed to ensure animal welfare standards are protected

- Continuation of non-tariff measures prohibiting the import and use of growth hormones in beef production and ractopamine in pig farming, and for pathogen reduction treatments in chicken production.
- Only offer Australia Tariff Rate Quotas (TRQs) for imports of animal products, and condition this liberalisation to Goods produced to UK-equivalent standards on farm and at slaughter. A risk analysis should be carried out on the impact of lowering tariffs for imports of beef and sheep without TRQs on UK animal welfare standards.
- Immediately set up the TAC to audit the Australian FTA before it is ratified by Parliament
- Issue a report to Parliament showing impact of the deal on UK farm welfare standards.
- Inclusion of comprehensive and ambitious provisions on animal welfare cooperation recognising animals are sentient beings and the link between animal welfare and sustainability of food systems. These provisions should also set up an aim to improve animal protection through strengthening legislation and implementation of existing rules.
- The chapter on technical barriers to trade (TBT) ensures that mandatory method-of-production labelling would be acceptable under the FTA.