



HOW A COMMON VETERINARY AGREEMENT UNDER THE UK-EU TRADE AND COOPERATION AGREEMENT CAN IMPROVE ANIMAL WELFARE

Recommendations: what we would like to see from a CVA

- **Retention of existing standards:** the UK has banned the live exports of farmed animals and horses from GB for slaughter or further fattening¹, a long-standing Government commitment which has improved the welfare of British farmed animals and horses and will also help to end illegal trade. There is also a Private Members Bill on prohibiting imports of dogs into Britain under six months² currently being discussed by the UK Parliament which is supported by the UK Government, and across the House. As these changes strengthen have (or will) animal welfare, strengthen the legislation and not weakened standards, these they should be retained.
- **Non regression of standards:** The UK and the EU start off from a position where there is equivalency in most of the 44 animal welfare standards in the acquis that the UK inherited and kept as it left the EU. Although the TCA has a non-regression clause on environmental legislation and standards (a country cannot weaken their legislation) there is no such explicit restriction on animal welfare standards³. This allows the UK to raise or lower their standards on animal welfare from legislation in Great Britain and the EU acquis, whereas if there was a non- regression clause on animal welfare it would prevent British (or EU) legislation from being lowered. As two like- minded partners on animal welfare, it would be simple to add a non- regression clause to prevent any lowering of standards in the future.
- **Dynamic alignment of animal welfare standards:** the EU is in the process of revising its animal welfare legislation, and will be looking at possible bans on the use of cages; in addition, the UK is also likely to start examining new proposals that could include methods of production labelling and bringing in import restrictions on dogs and cats into Great Britain. Aa dynamic alignment of standards would ensure smooth trade between like-minded partners while giving flexibility to Governments in both areas to improve animal welfare standards going forward.
- **Maintain equivalent animal health standards with import restrictions:** the UK maintains all its import restrictions inherited from being a Member State such as the ban on the use and import of hormones used in beef production, the use and import of ractopamine in pig production and the import of chicken washed in chlorine. As both the UK and EU are negotiating FTAs with other countries, keeping these standards ensures that parity is maintained on the import of any food produced to against these standards and no leakage of such products can occur if SPS controls are relaxed with third countries benefiting from a FTA. The UK already ensured in its UK-US deal that the ban on the import of hormones used in beef production and the ban on the import of chlorine/chicken were maintained.

¹ Live exports (Enforcement Regulations 2024 <https://www.legislation.gov.uk/ukdsi/2024/9780348263602>

² <https://bills.parliament.uk/bills/3790>

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/948119/EU-UK_Trade_and_Cooperation_Agreement_24.12.2020.pdf Art 7

- **Apply domestic animal welfare standards to imports: Introduce import requirements related to animal welfare in their respective legislation:** The UK and the EU import a significant amount of animal products from third countries without applying their respective animal welfare standards - except for welfare at the time of slaughter, which both apply to slaughterhouses in third countries exporting meat to the UK or the EU. This leaves other legislation, such as on poultry, pig and egg production, vulnerable to imported products not meeting EU or UK standards, thereby and so undermining citizens' expectations on the welfare of animals and jeopardising UK and EU farmers in meeting those expectations. Agreeing on applying any new or revised standard to all products placed on their market, including imported products, would ensure be a good way of ensuring that the UK's and EU's external trade policy are compatible with their welfare standards. The intra EU-UK trade would be solved through dynamic alignment or non-regression provisions as set out above.
- **Maintain equivalence on animal health standards:** Veterinary medicines entering Northern Ireland from Great Britain will be required to comply with EU regulations after December 2025, when the present grace period ends. The Windsor Framework made no changes to these rules. This will mean that any veterinary drugs entering Northern Ireland from Great Britain will be required to be tested within the EU. Secondly, the marketing authorisation holder will have to be in the EU. Making such changes is burdensome, costly and could see a reduction in veterinary medicine entering Northern Ireland if it has been produced in Great Britain and not the EU. This will impact on animal welfare, animal health and disease control. TAWC believes that any veterinary agreement needs to ensure nonrestrictive trade into Northern Ireland for veterinary drugs.
- **Maintain UK's animal health and disease-free status:** a large legal commercial trade in dogs exists between Ireland and the UK and mainland EU and the UK. This masks an illegal trade in dogs which has high disease risks from zoonotic diseases such as Brucellosis canis, rabies and distemper. Both B canis and distemper have been found in dogs imported from Europe and, although rare, B canis in dogs have transferred to humans. The CVA should ensure that the EU lists the UK as a Part 1 listed country under its pet travel Regulation.
- **Access to databases and cross sharing of information:** the UK has lost access to the TRACES EU database and must institute its own, IPAFFS. Ensuring the UK is listed by the European Commission as an authorised source of imports for animals and animal products, would ensure there is better information sharing, reduce the need for forms and facilitate the importing of animals imported into the EU's SPS Area (including Northern Ireland). It would for instance stop the need for a pet passport when travelling with a dog from Great Britain to Northern Ireland and mainland Europe.
- **Maintaining enforcement:** There is potential in any veterinary agreement to reduce the number of enforcement checks as the Agreement is implemented alongside more alignment. The EU-New Zealand VA has a reduction in checks built in as the Agreement is implemented and the EU-Swiss CVA mandates has fewer checks at the border based on the risk profile. The risks can be calibrated according to the types depending on the types and frequency of checks. TAWC would recommend introducing such a system into a UK-EU Veterinary Agreement as it would reduce the welfare issues on low-risk animals such as high-status horses whilst not sacrificing the disease risks with higher risk animals such as puppies. Additionally, if the movement of animals were deemed to be non-compliant (e.g. carrying incorrect paperwork), animals could either be re-dispatched to their country of origin, placed into quarantine, or euthanised. From a disease prevention perspective there are clear advantages to having from more border controls which would deter illegal trade and be able to allow for the identification of filter any live animals with diseases, particularly zoonotic diseases.

- **Mutual recognition of qualifications:** the Trade and Cooperation Agreement does not have a mutual recognition of qualifications such as those of the veterinary profession. Mutual recognition of this kind would either, which will grant allow veterinarians automatic permission to work in each other's countries, although there is a provision for authorities and appropriate bodies to draw up mutual recognition systems. The adoption of this mutual This mutual recognition principle would enable may impact on the ability of UK staff such as veterinarians to operate in other countries and the UK to attract EU veterinarians to work in the UK, including in roles such as here particularly in sectors such as slaughterhouse enforcement officer's staff. This would be beneficial to animal welfare. A mutual recognition of qualifications would resolve this issue.

Introduction

The Trade and Cooperation Agreement (TCA), in force since January 2021, fully liberalises trade in animal and animal products between the EU and the UK. Yet it does not consider animal welfare standards and creates concerns for animals and animal products that must go through strict import controls. The lack of any veterinary agreement between the UK and the EU is a significant shortcoming given the difficulty of implementing SPS controls on imported food. The UK published the Border Trade Operating Model (BTOM)⁴, due to be partially implemented from October 2023, but it has been postponed on several occasions.

Negotiating a common veterinary agreement (CVA) with the EU is a unique opportunity to fulfill the Government manifesto to deliver for animal welfare. It is essential that any CVA / SPS agreement that the UK Government negotiates with the EU a) does not prevent the UK Government from raising existing animal welfare standards, such as phasing out the use of crates and cages b) prevent the import or sale of products that do not meet UK standards, either current standards or future [improved] standards and c) require the UK Government to roll back existing standards and legislation, for example the ban on live animal exports for slaughter and fattening.

Since the Trade and Animal Welfare Coalition (TAWC) submitted its [options paper](#) on a CVA in December 2024, discussions on what sort of CVA would best deliver for animal welfare have progressed. Yet reassurance from the Government that existing standards and legislation will not be compromised as a result of any such agreement have not been forthcoming. The EU and Switzerland have signed an enhanced food veterinary agreement which permitted a carve out for Swiss animal welfare standards which could continue to be maintained and raised even where they do not have parity with EU standards. This could be used as a model for the UK-EU CVA.

What is the problem we are trying to solve on SPS controls and why do they matter for animal welfare?

Great Britain has been a third country to the EU since January 2021 so GB to EU trade is subject to sanitary and phytosanitary (SPS) controls. These controls include the use of export health certificates (EHCs), advanced electronic notification procedures, and inspections at border control posts (BCPs), as well as customs and contractual procedures for the movement of animals and animal products between the UK and EU.

Companion animals

Border controls affect the commercial and non-commercial trade in live animals and their products. Two examples underline this. At present, the UK is not listed as a country by the European Commission that applies or implements the EU's Regulation on the trade in cats and dogs⁵. Although the UK has a desire and has applied to be a listed country for non-commercial travel for pet cats and dogs, this has to date been rejected by the

⁴ <https://www.gov.uk/government/publications/the-border-operating-model>

⁵ Regulation 576/2013 Regulation 577/2013

EU. Pet passport rules are only available for those countries that dynamically align with EU rules,⁶ essentially CVA countries. This means that anyone visiting Northern Ireland from Great Britain can only do so if their dog or cat has a pet passport. Secondly, the CVA could address the problems the UK has experienced in exporting bivalves to the EU⁷. UKICE research found that a veterinary agreement could result in a 22.5% increase in exports from GB to the EU, and a 5.6% increase in imports.

The CVA also offers a timely opportunity for the EU and UK to encourage a dynamic alignment given the ongoing or upcoming reforms in their respective animal welfare laws. In the EU, two legislative proposals - on the welfare of dogs and cats and their traceability and on transport of animals - are under discussion in the European Parliament⁷.

Farmed animals / Animals in the Food System

Since the UK left the EU in January 2021, there has been some divergence in standards resulting from new laws in both the UK and EU. A comprehensive EU-UK CVA should retain legislation from either party that has strengthened standards. For instance, recent pieces of legislation in Great Britain including the ban on live exports of farmed animals and horses from GB for slaughter or further fattening⁸, the mandatory use of CCTV in slaughterhouses in England⁹, Scotland and Wales¹⁰ and the banning of snares in Wales¹¹ should be retained and be 'carved out' from any forthcoming negotiations and/or agreement. Pending a full revision of the animal welfare legislation, a proposal banning cages in animal farming should be put forward by the European Commission in 2026. In the UK, Governments will make decisions in the coming year on mandatory methods of production labelling, phase out of cages for laying hens and farrowing crates for pigs and genetic engineering authorisation of animals.

Conclusion

The UK has a clear and urgent opportunity to negotiate a CVA with the EU that strengthens animal welfare, reduces trade barriers, and protects public and animal health.

However, it is essential that a CVA retains and enhances existing high standards, ensures non-regression of animal welfare protections, and enables mutual recognition of veterinary qualifications. It must also facilitate continued access to essential databases, reduce unnecessary border checks, and maintain the UK's disease-free status.

The Government must act decisively to secure a comprehensive CVA that not only meets its manifesto commitments but also builds a future-proof, welfare-led trade relationship with the EU. A strong agreement would benefit farmers, businesses, veterinarians, and citizens — and crucially, deliver lasting improvements for animals in both the UK and EU.

⁶ <https://www.gov.uk/government/publications/minutes-of-the-third-meeting-of-the-trade-and-cooperation-agreement-partnership-council-16-may-2024/minutes-of-the-third-meeting-of-the-trade-and-cooperation-agreement-partnership-council-16-may-2024>

⁷ https://eur-lex.europa.eu/resource.html?uri=cellar:c16e01a8-94d9-11ee-b164-01aa75ed71a1.0001.02/DOC_1&format=PDF

⁸ Live exports (Enforcement Regulations 2024 <https://www.legislation.gov.uk/ukdsi/2024/9780348263602>

⁹ <https://www.legislation.gov.uk/ukdsi/2018/9780111166123>

¹⁰ <https://www.gov.wales/mandatory-use-cctv-all-slaughterhouses-approved>

¹¹ <https://www.legislation.gov.uk/asc/2023/4/contents>