



Animal Welfare.  
Worldwide.

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. As experts in animal welfare, we would like to respond to this call for evidence with our own research, knowledge and expertise on these issues raised in regard to farm animal welfare and the impact of a trade deal with nations with lower animal welfare standards than our own.

### 1. How will this Agreement impact you, your business or your organisation?

Trade agreements can have a big impact on animal welfare. While they do not explicitly lower domestic animal welfare standards, they aim at liberalising trade, including trade in animal products. As the UK only applies rules related to animal welfare at the time of slaughter to imports, this FTA will likely contribute to an increase in imports of lower welfare animal products. Whilst we welcome the decision to not lower tariffs on pig meat, chicken meat, egg and egg products, the UK-Australia FTA does lower, over a 15-year period, tariffs on sensitive agri-food products such as beef and lamb without any animal welfare conditions. The standards at which cattle, lamb and sheep are reared and transported in Australia fall drastically below what is permitted in the UK, and there is currently no language in the Agreement in Principle (AiP) that would stop imports of these products into the UK.

As the first new trade deal that the UK Government will sign post-Brexit, this FTA must set a precedent in establishing what the UK is willing to accept regarding the animal welfare and environmental practices behind overseas products. We must ensure that this, and any future FTAs, align with the UK's commitment to high animal welfare and that new trade deals will not undercut Welsh farmers with low welfare and cheap imported alternatives. In its current state, this Agreement could force British farmers to reduce their standards and move away from high welfare farming to intensive systems to retain a profit advantage.

To support the global welfare of animals, it is vital that this Agreement and all future trade deals implement a set of agreed core standards for animal welfare, as this is the single most significant measure that is lacking from the UK-Australia FTA. As a voice for the voiceless, FOUR PAWS UK represents the interests of animals that will suffer because of this Agreement. According to the Department for International Trade (DIT) Impact Assessment of the UK-Australia FTA<sup>1</sup>, this Agreement will require “a reallocation of resources away from agriculture, forestry, and fishing (around -£94 million) and semi-processed foods (around -£225 million)”. With approximately 80% of Welsh land being managed for farming<sup>2</sup>, this reallocation of resources will significantly impact the Welsh agricultural sector and its economy. In 2020, £240 million in principal grants and subsidies were paid out through the Basic Payment Scheme (BPS)<sup>3</sup>. Reallocating agricultural resources could reduce the number of farmers that can claim BPS. With less farmers able to claim BPS, the incentive to follow implemented Greening measures<sup>4</sup> is lost and the environmental impact of Welsh agriculture subsequently increases. The £225 million reallocation from semi-processed foods could also severely hamper Welsh agricultural production, with milk and milk products accounting for approximately 30.2% of agricultural production as a share of gross output in 2020<sup>3</sup>.

FOUR PAWS UK  
7-14 Great Dover Street  
London SE1 4YR | UK

phone: +44 (0)20 7922 7954  
e-mail: supportercare@four-paws.org.uk  
www.four-paws.org.uk

Charity Number 1118102





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The lack of conditions on tariff liberalisation in the UK-Australia FTA has the potential to undermine Welsh farmers as they are exposed to competition from cheaper, low welfare Australian animal-product imports. A shift in demand from local products to cheaper imported alternatives could jeopardise the Welsh agricultural sector; in 2020 up to 24,000 farms that reared animals in any capacity were registered in Wales, with a total of 52,800 farm labourers being recorded<sup>3</sup>.

Between both resource reallocation and competition from imports, it is difficult to see how the current UK-Australia FTA will not negatively impact the Welsh agricultural sector.

### 3. What are the likely social and environmental impacts of the Agreement?

#### Social Impacts

The UK-Australia FTA has the potential to improve food security as low welfare animal-product imports will likely be cheaper than products produced in the UK as a result of higher welfare keeping systems costing more to run. Whilst this may make some food products more affordable for British citizens, it also puts them at risk of consuming products farmed in low welfare, low quality conditions, conducive to zoonotic disease risk<sup>5</sup>. Regarding antimicrobial resistance, chapter 25 of the trade deal limits its mention of AMR to loose commitments and cooperation rather than the strong measures we would need to see so as to safeguard public health. We would hope that the inclusion in Article 25.2 Part 6 stating *“The Parties shall facilitate the exchange of information, expertise, and experiences in the field of combatting antimicrobial resistance, and identify common views, interests, priorities, and policies in this area”* will ensure transparency between both parties on the status of AMR and the levels of antibiotic usage in their farming systems.

As previously stated, a shift in demand from local products to cheaper imported alternatives could jeopardise up to 24,000 Welsh farms and negatively impact up to 52,8000 farm labourers. However, if the entire local industry is impacted, the extent to which jobs could be jeopardised surpasses just farms and impacts the whole industry; slaughterhouses, factories and packaging warehouses will all be negatively affected through this Agreement.

#### Environmental Impacts

The UK-Australia FTA holds a variety of environmental implications that negatively affect the UK Government’s goal to achieve net zero. If we import beef from arid regions of Australia such as Queensland and North-Western Australia, the carbon footprint is likely to be much higher than that of UK beef due to the relatively poor and sparse pastures. Unlike in the UK, it is not common practice in Australia to feed livestock with conserved hay or silage in the summer months when there is little rain, increasing the carbon footprint of the meat. Australia is also the only developed country on the world list of deforestation hotspots according to WWF<sup>6</sup>, with 71.5 – 98.1 thousand hectares of forest being cleared annually. The Wilderness Society established in a 2019 analysis<sup>7</sup> that Australia has lost 27% of its natural rainforest and that 73% of all deforestation and land clearance in Queensland is associated to beef production. Carbon emissions released by land clearing across Australia are equivalent to approximately a third of the total emissions released by all of the coal-fired power stations in the country and, once native forest logging emissions are included, the combined emissions are equivalent to at least half the carbon pollution of all Australian coal-fired power stations.

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The UK Government's Climate Change Committee (CCC) stated in its Land use: Policies for a Net Zero UK<sup>8</sup> key findings that we must "encourage low-carbon farming practices and reduce the consumption of the most carbon-intensive foods by reducing the consumption of beef, lamb and dairy by at least 20% per person". Importing intensively farmed animal products that hold a much higher carbon footprint than locally produced low-carbon alternatives actively contradicts the recommendations of the CCC. Lord Deben, chair of the CCC, has publicly spoken out against the import of foods that are produced using environmentally damaging methods and stresses the need for strict controls on food imports to help meet the UK's net zero targets<sup>9</sup>.

It is not only the methods of intensive farming that hold a high carbon footprint, but the international shipping and offshoring of imports that also contribute to climate change. As there is still no international agreed requirement to record and publish emissions from international shipping and aviation, it is difficult to breakdown exactly the contribution that shipping emissions have on climate change. International shipping is thought to contribute only 2.5% to the global greenhouse gas emissions, yet in 2017 it was reported that aviation and shipping accounted for 27% of total EU emissions and it seems probable that the UK's share of this will be similar in percentage terms<sup>10</sup>. Official figures for greenhouse gas emissions only cover those that occur in individual countries and not those that occur in the production or transport of imported foods to that country<sup>11</sup>. It is vital we consider this when identifying the environmental impact of this and future FTAs, as by replacing animal products produced in the UK with imported animal products, the UK Government will effectively be offshoring our emissions to meet emission reduction targets.

One of the UK's wider strategic objectives is also to achieve the UN Sustainable Development Goals (SDGs) by 2030. As it currently stands, the environmental impact of the UK-Australia FTA contradicts SDG 13, Climate Action, and specifically target 13.2 – Integrate climate change measures into national policies, strategies and planning. By allowing the importation of low welfare animal products that have been intensively farmed, the UK Government is contributing to the carbon footprint that livestock farming possesses and reneging on its SDG commitments.

#### 4. What are the likely impacts of the Agreement's provisions on trade in agricultural products on the agricultural and food sector in Wales?

As stated in question 2, the Agreement has the capacity to be extremely detrimental to the agricultural sector in Wales. Regarding the food sector, the Agreement would drastically reduce the quality of the UK's food supply through the import of low welfare animal products reared through farming practices banned in the UK.

The UK banned the use of sow stalls and barren battery cages for laying hens in 1999 and 2012 respectively. Contrastingly, an estimated 9 million laying hens – 70% of Australia's egg-laying flock are confined to barren battery cages<sup>12</sup> with no substantial plans set to end this practice. The Model Code of Practice for the Welfare of Animals: Pigs has restricted the use of sow stalls to six weeks of each pregnancy since 2017, and an estimated 10-20% of pig farmers in Australia are still using sow stalls. Furthermore, Australia is known to have demanded as far back as 2018 that Britain accepts hormone-treated beef imports<sup>13</sup>, a practice that has been banned in the EU since 1989 and carried over to the UK since Brexit yet is relied upon in around 40% of cattle farmed for beef production in Australia. Hot iron branding of cattle and mulesing of sheep are illegal practices in the UK under the Agriculture (Miscellaneous Provisions) Act 1968 yet are still permitted and commonly used in Australia. In addition to rearing

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practices, UK legislation for maximum journey times for cattle and sheep drastically differs with Australia, with a maximum of 28 hours in the UK compared to 48 hours in Australia without a break for food or water<sup>14</sup>.

The low welfare agricultural products imported from Australia have the potential to undercut Welsh producers, especially those in the sheep sector. According to the 2021 Welsh Farming Facts and Figures, Wales' sheep flock accounts for 27% of the UK's sheep numbers with a national population size of 8,990,000 sheep. As the largest exporter of sheepmeat in the world<sup>15</sup>, this Agreement could potentially damage almost a third of the UK's sheep sector.

5. What support will your business or organisation need from the Welsh and UK governments to respond to and prepare for the implementation of the Agreement?

We welcome the agreement between the parties that animals are sentient beings and the connection between improved welfare of farmed animals and sustainable food production systems in paragraph 1 of Article 25.1 on Animal Welfare. However, it is clear that the UK Government considers animal welfare less important than those included in Chapter 22 on Environment which includes cooperation, public participation, a working group, consultations, and the potential use of dispute settlement. The Animal Welfare chapter only includes cooperation and a working group.

For the FTA to truly reflect the UK's commitment to high animal welfare and environmental standards, the Welsh and UK governments must develop a list of comprehensive and ambitious provisions on par with what have been included in Chapter 22. These provisions should also set up an aim to improve animal protection through strengthening legislation and implementation of existing rules, ensuring that the UK applies rules to imports related to welfare at all stages of livestock lifetime, including rearing and fattening.

In November 2021 the Trade and Animal Welfare Coalition (TAWC), of which FOUR PAWS UK are a member, released a new report<sup>16</sup> detailing how to address core animal welfare standards in UK trade policy. In this report, TAWC suggests a two-step approach:

- First, the UK should maintain all animal welfare and animal health standards already covering imports, and strive to increase this list, wherever WTO rules allow for it. The revision of existing UK animal welfare standards – or the adoption of new rules – should be used as an opportunity to upgrade the necessary pieces of legislation to achieve such a purpose.
- Until this legislative revision, or if the UK would not have a case at the WTO, the UK should make the preferential access to its market granted in trade agreements conditional upon the respect of animal welfare standards applied in the UK.

As a wide-ranging group of organisations, TAWC uses their combined knowledge and expertise on matters relating to international trade and animal welfare to scrutinize and comment on current trade negotiations and concluded trade agreements. We would highly recommend the UK Government considers the recommendations of the recent TAWC report and, consequently, seeks further advice from animal welfare NGOs and the coalition to help feed into the TAC.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1041629/impact-assessment-of-the-free-trade-agreement-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-australia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1041629/impact-assessment-of-the-free-trade-agreement-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-australia.pdf)

<sup>2</sup><https://www.rspb.org.uk/about-the-rspb/at-home-and-abroad/wales/farminginwales/>

<sup>3</sup><https://gov.wales/sites/default/files/statistics-and-research/2021-08/farming-facts-and-figures-2021-695.pdf>

<sup>4</sup><https://www.soilassociation.org/media/1963/basic-payment-scheme-wales--updated-feb-2016.pdf>

<sup>5</sup> [https://media.4-paws.org/1/f/2/3/1f239223b5b08433a6064e07622050c2c92d0ec2/2021\\_FOUR\\_PAWS\\_Future\\_Study.pdf](https://media.4-paws.org/1/f/2/3/1f239223b5b08433a6064e07622050c2c92d0ec2/2021_FOUR_PAWS_Future_Study.pdf)

<sup>6</sup> <https://www.theguardian.com/environment/2021/jan/13/australia-the-only-developed-nation-on-world-list-of-deforestation-hotspots>

<sup>7</sup> <https://www.wilderness.org.au/news-events/10-facts-about-deforestation-in-australia>

<sup>8</sup> <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

<sup>9</sup> <https://www.fwi.co.uk/news/environment/climate-change-chief-calls-for-food-import-controls>

<sup>10</sup> <https://www.eea.europa.eu/data-and-maps/indicators/transport-emissions-of-greenhouse-gases/transport-emissions-of-greenhouse-gases-12>

<sup>11</sup> <https://sustainablefoodtrust.org/articles/why-we-should-be-concerned-about-a-free-trade-deal-with-australia/>

<sup>12</sup> <https://www.independent.co.uk/news/uk/politics/rspca-farmers-brexit-australia-mulesing-b1850143.html#r3z-addoor>

<sup>13</sup> <https://www.independent.co.uk/news/uk/politics/hormone-injected-beef-trade-deal-australia-b1851531.html>

<sup>14</sup> <https://tawcuk.org/wp-content/uploads/2021/06/Australia-Trade-Deal-Overview.pdf>

<sup>15</sup> <https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/fast-facts--maps/2020/mla-sheep-fast-facts-2020.pdf>

<sup>16</sup> <https://tawcuk.org/wp-content/uploads/2021/11/TAWC-Core-Standards-Paper.pdf>

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