





permit slaughter without stunning for slaughter in accordance with religious rites which provides for non-stun slaughter where food is intended for the consumption of Jews and Muslims.

14) At present the slaughter of non-stunned animals remains allowed in all States and Territories in  
mandated that birds  
shall be stunned before being slaughtered.<sup>5</sup>

15) In Australia, sheep raised for wool are commonly subjected to a painful procedure called  
to

developing these standards This will require a system requiring checks and continuous monitoring such as the existing EU FVO Audit Inspection system.

## Chapter on animal welfare and antimicrobial resistance (AMR)

- 21) The FTA contains a standalone chapter on animal welfare and antimicrobial resistance (AMR). BVA has called for the UK to be ambitious with the incorporation of these in our submissions to government. It is therefore welcome to see one, and indeed the first time Australia has incorporated such a chapter in any trade deal. However, the aspiration of the chapter is limited, especially as the UK will have already given away any leverage in the form of tariff-free market access. There are welcome words around general cooperation on welfare and AMR.
- 22) This chapter contains a non-regression commitment on animal welfare standards. However, a commitment to not regress from current standards would be more welcome if we were assured significantly between the UK and Australia. There are concerns that practices utilised in Australia, would fail to meet the standards expected in the UK or across the EU.
- 23) The FTA would see the parties establish a Joint Working Group on Animal Welfare. As can be seen above there is considerable scope for the UK to engage with Australia on animal welfare issues. Therefore, the membership of this working group will be important. We would ask the UK government to consider the balance of expertise it proposes for the group. Defra, as the UK Government department with responsibility for animal welfare should lead on this process. The involvement of veterinary surgeons will be essential.

## Sanitary and Phytosanitary (SPS) measures

- 24) Imports of both animals and animal products may carry pathogens that can represent a threat to UK public health and the health of livestock, wildlife and pet animals. Sanitary and phytosanitary (SPS) measures are those measures to protect humans, animals, and plants from diseases, pests, or should not be seen solely as a barrier to trade that needs to be overcome. In the broadest sense, biosecurity can be said to cover every aspect of disease control, prevention and treatment, all of which are areas that rely upon the knowledge and skill of veterinary professionals.
- 25) The great majority of new free trade agreements (FTAs) now contain provisions seeking to simplify SPS trade requirements. SPS issues have often taken centre stage in the most recent and wide-ranging trade agreements.

26)

<sup>10</sup> This has now been agreed in the final text of the FTA. As such, the UK retains the ability to ban goods based on animal or public health grounds. However, this would not apply to barriers that are based on animal welfare grounds or environmental concerns.

- 27) The FTA would create a forum where opportunities to simplify SPS requirements or remove barriers can be agreed. This work is often technical and requires professional knowledge, hence the importance of veterinary surgeons within the trade sphere. The inclusion of veterinary surgeons as part of trade negotiation teams, trade missions, and within embassies is the norm

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<sup>10</sup> <https://www.gov.uk/government/publications/uk-australia-free-trade-agreement-negotiations-agreement-in->



relevant profession.

- 35) We note the existence of the Agri-food Trade Advisory Group. However, the membership of this group consists of business representative organisations and contains nobody from a veterinary, animal health, food safety or animal welfare science background. Therefore, engagement with this group can in no way be seen as meeting a requirement to have consulted on the wide range of concerns held by the veterinary profession.
- 36) It is welcome to see veterinary expertise represented within the membership of the TAC. It will also be essential that this strengthened body draws upon additional veterinary expertise to scrutinise future trade deals and put animal health and welfare at the centre of decision making.