POSITION PAPER
ANTIBIOTICS & TRADE

November 2019

Antibiotic-resistant superbugs know no boundaries and can travel globally on food. To protect consumer health, trade policy must not allow the importation of food produced to low standards. Cheap imported food, produced with routine antibiotic use could also threaten the competitiveness of British farming. UK trade policy should aim to protect UK food standards and to promote improvements in global standards.

Overuse of antibiotics in human and animal medicine is undermining their ability to cure life-threatening infections in people, by creating dangerous bacteria resistant to antibiotics. According to the government-commissioned Review on Antimicrobial Resistance (O'Neill Review) antibiotic resistance will cost the world 10 million extra deaths a year and up to $100 trillion by 2050 unless significant action is taken.

In the UK and EU, there has been significant progress over recent years to improve antibiotic stewardship. Farmers and governments have taken action to monitor use and set reduction targets, which has helped achieve some significant cuts in antibiotic use. New, strengthened EU regulations are also contributing, as farmers prepare for bans on routine antibiotic use and preventative mass medication which come into force in January 2022.

However, the government's desire to adopt an independent trade policy risks opening up the UK market to animal products from countries where antibiotics are greatly overused, unless sufficient safeguards are in place. Outside of the EU, regulatory frameworks are often weaker and enforcement of existing regulations can be poor, overall levels of use may be far higher and some countries still allow antibiotic use for growth promotion (a practice banned in the UK and EU). It is therefore essential that trade policies aim to ensure that British farmers are not made to compete with those producing to much lower standards, and instead support recent progress and avoid rewarding bad practice.

The Alliance to Save Our Antibiotics has nine key recommendations to safeguard human and animal health pertaining to trade and antibiotics when the UK leaves the EU.

1. Standards

The UK public should be protected by antibiotic trade standards which do not regress from current EU standards

A move to deregulate and to accept meat and dairy produced to lower standards could have an adverse effect on the British public's exposure to antibiotic resistance via the food chain. We know that antibiotic use in livestock in many countries around the world is extremely high and poorly regulated. An example of this pressure to deregulate and lower our standards has come from the US, whose trade mandate and ambassadors have repeatedly highlighted the importance of the UK accepting US food

and farming standards. Deregulation may contribute to a reversal in recent UK reductions in farm antibiotic use.

2. Growth promotion

The UK should immediately ban imports of food produced with the use of antibiotic growth promoters

Low doses of certain antibiotics have a growth-promoting effect when fed to animals. This practice has been banned in the EU since 2006, but is still allowed in at least 45 countries worldwide. New EU legislation which comes into force in 2022 will extend the European ban by ending the importation of meat, dairy and eggs produced with antibiotic growth promoters. In order to avoid importing products produced to very low standards, the he British government should also implement a ban on the importation of food produced with antibiotic growth promoters.

3. Routine antibiotic use and preventative mass medication

The UK must ban all routine use of antibiotics on farms, including preventative mass medication. UK trade policy should aim to phase out the importation of food produced with all forms of routine antibiotic use.

New EU legislation, which will come into force in January 2022, will ban all routine antibiotic use in farming, including preventative group treatments. The UK should also adopt this legislation, in full. Otherwise by allowing mass medication of farm animals to remain legal, the UK could end up with some of the weakest regulations on farm antibiotic use in Europe.

In recent years, the UK livestock industry has been significantly reducing its use of preventative mass medication, and these treatments are no longer permitted under Red Tractor standards for poultry. Nevertheless, there remains a strong case for a UK ban on all such treatments as it would accelerate moves towards responsible use and render illegal the most egregious practices. In order to further protect consumer health and British farmers producing to high standards, the government's trade policy should aim at phasing out all food imports produced with routine antibiotic use or preventative group treatments.

4. Protecting health

Risk assessments should be undertaken for any trade deal

Governments have a legitimate duty to protect plant, animal and public health. In trade, this should be included in food standards that underpin trading relationships, both at national and international level. Measures to protect health, based on robust risk assessments, must be included in any trade negotiations and not removed to facilitate trade deals. The UK should undertake scientific risk assessments of the risk to public health from importing food from production systems with poor antibiotics stewardship. This must be undertaken by an independent scientific body, in consultation with wide stakeholder groups, including civil society, in good time to inform decision-making and govern trade negotiations.

5. Democratic scrutiny

Proposed trade deals should be open to third-party scrutiny

Our elected representative in Parliament must have a say on the mandate for trade negotiators, red lines in negotiations and the proposed deals themselves. Public consultations should be undertaken and civil society should have the opportunity to contribute.

6. One Health action at a global level

One Health principles should be upheld

The UK government has played a key role in pushing for global action to address the world's antibiotic-resistance crisis. In 2016, representatives from 193 countries signed a declaration on antimicrobial resistance at the United Nations General Assembly. The UN as well as "Tripartite" agencies, the World Health Organization, the Food and Agriculture Organization and the World Organization for Animal Health have since agreed to establish new governance structures, including a Global Leadership Group on Antimicrobial Resistance and an Independent Panel on Evidence for Action against Antimicrobial Resistance. It is encouraging to see that these institutions are taking a One Health approach, attempting to address the overuse of antibiotics in both human and veterinary medicine. Unfortunately, the proposed actions against the misuse of antibiotics in farming focus mainly on phasing out the use of growth promoters, without even any target set to achieve this. Globally, over 70% of all antibiotic use is in farming so the government should push for global agencies to take much stronger, more effective action aimed at reducing this use. This should include the setting of targets, strengthening regulation and improving animal husbandry and animal health.

7. Responsible Free Trade Agreements (FTAs)

Bilateral trade deals should meet UK standards of animal husbandry and antibiotics use

New FTA trade deals may open the UK farming industry up to competition from cheaper, more intensively produced food from outside the UK and the EU. Any trade deals that are made should use the UK's right, under the WTO Sanitary and Phytosanitary Agreement, to adopt measures that aim to achieve the level of protection of human and animal health chapter rights which the UK determines to be appropriate. When negotiating new FTAs the UK must include a clause requiring imports to at least meet UK standards of animal husbandry, farm animal welfare and responsible antibiotics use.

8. Environmental Subsidies

Support the UK domestic farming sector

If new trade deals are made, UK farming should be supported against any shock or potential downward pressure on standards and prices that could result from imports that are cheaper due to being produced to lower standards than those of the UK. There should be a clearly defined government environmental and conservation programme which is dependent on the fulfilment of specific conditions related to production methods and inputs relating to organic farming, pasture-based farming and integrated crop-livestock systems. Such a programme would allow the UK to provide support to domestic higher-welfare farms in the form of subsidies. Organic and higher-welfare farming requires lower antibiotic use and has a reduced environmental footprint.

9. WTO Tariff Schedule

Low WTO tariffs for animal products produced in systems that have higher welfare and low antibiotics use

The UK should amend its schedule of concessions under the General Agreement on Tariffs and Trade (GATT) 1947 to liberalise trade for favourable agricultural items. The UK tariff schedule, in line with the Sustainable Development Goals, allows the UK to differentiate food imports by process and production method, environmental impact and threat to the availability of effective and affordable antibiotics globally. The UK should therefore lower import tariffs on foodstuffs from less intensive farming systems

that meet higher standards on antibiotics use and animal welfare, while maintaining higher trade tariffs on items that do not. This lowering of tariffs for organic, grass-fed and higher-welfare animal products, alongside domestic subsidies and standards legislation, will glean the best possible results from any post-Brexit trade deals.

Founded by:

The **Alliance to Save Our Antibiotics** is an alliance of health, medical, civil society and animal welfare groups campaigning to stop the overuse of antibiotics in animal farming. It was founded by **Compassion in World Farming**, **the Soil Association** and **Sustain** in 2009. Our vision is a world in which human and animal health and well-being are protected by food and farming systems that do not rely on routine antibiotic use.