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Secretary of State for International Trade
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Dear Secretary of State

We write to express our strong concerns about the possible negative impact of the UK-Australia trade deal on human health in the UK and to flag the weak scrutiny arrangements. We call on you to publish a formal commission on the impact on human health of the UK-Australia trade deal

Antimicrobial Resistance

Worldwide it is estimated that two thirds (66%) of all antibiotics are used in farm animals, not people, with very significant consequences for the global rise in Antimicrobial Resistance and untreatable medical conditions in humans. Australia has very poor surveillance of on-farm antibiotic usage. Additionally, it still permits the use of antibiotics as growth promoters in livestock production (banned in the UK since 2006). In the case of pig and poultry production, Australia also uses three and 16 times the amount of antibiotics as the UK does respectively.

Encouraging and facilitating the importation of food from countries that overuse antibiotics increases the global risk of building resistance to medically critical antibiotics (AMR). It is also at odds with the Government's own policy. The UK Government's '[20-Year Vision for Antimicrobial Resistance](#)' states: "*The United Kingdom is determined to sustain its efforts to combat resistance, taking local, national and global 'One-Health' approaches across humans, animals, the environment and food, in line with global ambitions and in collaboration with other nations, partners and the international community.*"

This trade deal risks undermining investment in global health, tacking AMR and health service efficacy by other UK Government departments and public health authorities. For example, investing in health systems remains a key priority for the [Foreign, Commonwealth and Development Office](#) and other government departments working on global health.

Chapter 25 of the UK-Australia trade deal covers animal welfare and Antimicrobial Resistance but the provisions are extremely weak. We have little confidence that these provisions uphold stated government policy on AMR, nor that they provide adequate protection against its spread. Given the stark warnings on the weakening of medically critical antibiotics, weak promises to 'explore initiatives' to reduce dependency on antibiotics is not sufficiently robust. The UK needs to strengthen its regulations on antibiotic usage, not weaken them to facilitate trade deals.

Pesticides

Australia's pesticide standards are far weaker than their UK equivalents. Australia licences the use of almost double the number of Highly Hazardous Pesticides (HHPs) as the UK (144

to the UK's 73). The list of active substances approved for use in Australia but banned in the UK includes the lethal herbicide paraquat and bee-toxic neonicotinoids.

Furthermore, Australia has no set period for reviewing pesticide approvals meaning that they can remain in use indefinitely once authorised. As a result, pesticides that have been shown to cause harm can continue to be used for many years. In contrast, in the UK pesticides are authorised for a maximum of 15 years before having to be reapproved.

In addition, Australia's Maximum Residue Limits (MRLs) tend to be higher than the UK's, meaning that larger amounts of pesticides are allowed to appear in food. For example, grapes from Australia are allowed to contain 200 times the amount of the insecticide methomyl than their UK equivalent. In terms of potential health impacts, methomyl is acutely toxic, a suspected endocrine disruptor and a cholinesterase inhibitor. Australia also allows more toxic pesticides to appear in food than the UK, such as dimethoate which is a possible carcinogen. Dimethoate is banned in the UK for reasons which include the potential risk posed to consumer health through long-term exposure via diet.

Diets

The UK has a well documented obesity crisis which has been exacerbated by the Covid-19 pandemic. The National Food Strategy, published in 2021, recommended a tax on sugar and salt to incentivise product reformulation as well as mandatory business reporting. The Government's obesity strategy (England only) includes bringing in new regulations to incentivise healthy reformulation, reduce exposure to junk food marketing and promotion and expand clear nutritional labelling based on the evidence based Nutrient Profiling Model. .

The [Trick or Trade](#) report produced by the Sustain alliance in conjunction with researchers from the London School of Economics in 2021 found that Australia's negotiating objectives included the reduction and elimination of tariffs and non-tariff barriers and that this could lead to a reorientation of the type of agri-food products imported in the UK (e.g. increase the export of sugar from Australia to UK, which is one of their major exports).

The final UK-Australia deal confirms tariff-free access for 80,000 tonnes of Australian sugar to be sold to the UK in the first year (increasing by 20,000 tonnes each year for the next eight years). This is eight times the quota that Australia previously had for the whole of the European Union. It is unclear how increasing imports of sugar will help meet UK plans to radically reduce UK sugar consumption and halve childhood obesity by 2030.

Chapter 7 of the deal confirms the two government's intention to eliminate technical barriers to trade and promote greater cooperation on regulations. We would use requirements around food labelling as an example. Australia uses the voluntary Health Star front-of-pack rating system, which has been criticised as flawed. Should Australia push for harmonising standards according to theirs, and should the UK accept, this could jeopardise future UK plans to introduce mandatory front-of-pack nutritional labelling, which has been shown by UK Food Standards Agency research to be accessible, understandable and welcomed by UK consumers, already familiar with its widespread use on supermarket own-brand food.

Scrutiny arrangements

The UK-Australia trade deal was signed on the 16 December. On that day, the Department for International Trade [formally commissioned](#) the Trade and Agriculture Commission to provide advice on whether it is consistent with the maintenance of UK levels of statutory protection in relation to animal or plant life or health, animal welfare, and environmental protections. In its subsequent [call for evidence](#) the Trade and Agriculture Commission made

clear that it will not, as per its terms of reference, advise on the impact on human health. It stated that the Food Standards Agency will fulfil this role.

You have a duty, under Section 42 of the Agriculture Act, to provide a report to Parliament about the extent to which trade deals are consistent with the maintenance of UK levels of statutory protection in relation to human life or health (as well as animal and plant). To date there has been no formal commission from Government to the Food Standards Agency, nor a call for evidence from them. We also obtained under FoI a scrutiny flowchart given to Trade Minister Penny Mordaunt by officials and there is no mention of the role of the Food Standards Agency in the scrutiny arrangements. In our view, this is an unacceptable gap in the UK's trade policy.

We ask that you publish a commission urgently and we call for the assessment of human health protections to be subject to equivalent levels of transparency, evidence gathering and publication as that of plants and animals.

We urge you to seek advice urgently from the Food Standards Agency and any other relevant health bodies on a range of issues relating to this trade deal, particularly the impact on diets, the risk of increased antimicrobial resistance and highly hazardous pesticide residues.

Without this, Parliament will be unable to assess how this deal impacts on the health of the UK population.

Consumer trust and confidence

There have been numerous damaging food safety incidents in the UK food system: BSE, Foot and Mouth Disease, the Salmonella egg crisis, horsemeat and other meat fraud cases as well as food poisoning outbreaks. Many of these have related directly to meat and dairy products.

These incidents have caused severe disruption to food supplies, exorbitant costs to the industry and consumers, and resulted in many years of costs associated with cleaning up the supply chain, implementing new safety and governance measures, and re-building consumer trust and confidence.

We urge you to consider the implications of allowing meat and dairy imports that raise consumer concerns about the safety, quality, traceability, antibiotics stewardship, pesticide use and residues, animal welfare and other personal and ethical implications of what they are eating.

We are concerned that lower standard produce will be used in UK settings and products where country of origin information and method of production labelling is not required, such as cost-sector catering, school and hospital food, and processed products such as ready meals. These industries could ill afford the disruption and loss in consumer confidence from a food supply chain failure related to low standard produce facilitated by a trade deal.

Yours sincerely.

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CC:
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