



Please reply to:

Philip Lymbery, Global Chief Executive, Compassion in World Farming and
Prof Tim Lang

18 June 2020

Dear [Chief Executive]

Potential threats to UK food standards and consumer confidence from trade deals with the USA and other countries

As you will be aware, there is a real danger that a trade deal by HM Government with the USA and other countries will require the UK to permit the import of foods, particularly meat, dairy products and egg products, that have been produced to standards that are lower than those of the UK. To allow the import of food produced to lesser standards of food safety, animal welfare, antibiotics stewardship and environmental protection (including tackling climate change) could, we believe, raise public health concerns, add further to health inequalities and would undermine the livelihoods of UK farmers and lower the quality of some of the food available to UK consumers

We have set out in the Appendix, some of the key issues that are likely to arise under trade deals. Whilst this letter spells out the issue that is currently in the public eye i.e. the trade negotiations with the USA, the concerns it raises are illustrative of those likely to arise under a trade deal with any country.

We urge [supermarket name] to make it clear publicly that it is not prepared to sell food imported under a trade agreement with the USA or other nations where that food has been produced to food safety, animal welfare, antibiotics stewardship or environmental standards lower than those that apply in the UK. We would be grateful if we could have a meeting with you to discuss this issue. We look forward to your response.

Yours sincerely

Civil Society Organisation signatories

Chartered Institute of Environmental Health, Gary McFarlane, Director NI
Compassion in World Farming, Philip Lymbery, Global Chief Executive
Farmwel, ffinlo Costain, Chief Executive
Food Ethics Council, Dan Crossley, Executive Director

Friends of the Earth, Mike Childs, Head of Science, Policy and Research
Green Alliance, Shaun Spiers, Executive Director
Nature Friendly Farming Network, Martin Lines, UK Chair
Pesticide Action Network UK, Dr Keith Tyrell, Director
Sustain, Kath Dalmeny, Chief Executive
Sustainable Food Trust, Patrick Holden, Chief Executive
Vet Sustain, Laura Higham, Founder

Academic signatories

Prof David Barling, Professor of Food Policy and Security, Centre for Agriculture, Food and Environmental Management Research, University of Hertfordshire
Sian Buckley, Programme Manager, Environmental Health, University of the West of England
Prof Michael Cardwell, Professor of Agricultural Law, University of Leeds
Prof Janet Dwyer, Professor of Rural Policy and Director of the Countryside and Community Research Institute, University of Gloucestershire
Dr Tara Garnett, Environmental Change Institute, University of Oxford
Prof Tim Lang, Professor of Food Policy, Centre for Food Policy, City, University of London
Dr Natalie Langford, Postdoctoral Research Associate, Sheffield Political Economy Research Institute, University of Sheffield.
Tony Lewis, Associate Professor, Royal Agricultural University, Cirencester
Dr Emily Lydgate, Senior Lecturer in Law, University of Sussex
Prof Erik Millstone, Emeritus Professor of Science Policy, SPRU, University of Sussex
Prof Terry Marsden, Professor of Environmental Planning and Policy, and Director, Sustainable Places Research Institute, Cardiff University
Dr Jessica Paddock, Senior Lecturer in Sociology, University of Bristol
Dr Rosalind Sharp, Research Fellow, Food Research Collaboration, City, University of London
Prof Fiona Smith, Professor in International Economic Law, University of Leeds
Prof Michael Winter, Professor of Land Economy & Society, Centre for Rural Policy Research, University of Exeter

APPENDIX: SUMMARY OF SOME KEY ISSUES LIKELY TO ARISE AS A RESULT OF TRADE DEALS

Beef: The concerns about the import of hormone-treated beef are well known. The problems of US beef are not confined to the implantation of [synthetic growth-promoting hormones](#). US cattle are usually kept in feedlots for the last few months of their lives. Feedlots contain thousands of cattle kept in crowded, often dirty conditions. They are linked to animal welfare abuses, soil and water pollution, and are high emitters of climate-damaging gases. Hormone-treated beef from US feedlots will undercut UK pasture-based beef farmers on price.

Pork: Ractopamine is a beta agonist feed additive used to promote growth in pigs. Its use is permitted in the USA but prohibited in the UK due to concerns about impact on human health. Pork imported from the USA is likely to come from herds where sows are confined in narrow stalls during pregnancy. The use of sow stalls has been illegal in the UK since 1999 due to concerns about animal welfare.

Dairy products: BST (bovine somatotropin) is a genetically engineered lactation-promoting hormone that is injected into cows in the USA to increase milk yields. The use of BST is prohibited in the UK on animal welfare grounds. Imported US dairy products from BST-treated cows would undercut UK farmers on price.

Chicken meat and egg products: The import of [chicken washed in chlorine](#) or other chemical disinfectants has rightly caused concern, as an 'end of pipe' treatment to mask dirty conditions in production, slaughter and processing. Pathogen reduction treatments other than potable water are banned in the UK because they support intensive methods of farming with lower hygiene and welfare standards.

The use of barren battery cages is banned in the UK but they are used in most US States. In the UK 21% of eggs are used as ingredients in various products often in the form of whole egg

powder. Fresh eggs are unlikely to be imported from the USA. At present egg powder imports are discouraged by high tariffs, but the USA is likely to oppose the inclusion of such tariffs in a trade agreement. This may well result in egg powder coming into the UK from hens kept in battery cages in the USA. This would undermine UK egg producers who would find demand for their egg powder being replaced by US imports.

Antibiotics: Antibiotics are given to farm animals at much higher levels in the USA than in the UK. Antibiotics use in US beef cattle is at least nine times as high as in UK cattle. High levels of farm antibiotic use raise serious concerns about fuelling dangerous anti-microbial resistance, which affects everyone. Anti-microbial resistant superbugs, and other transmissible deadly pathogens, do not respect national boundaries – as the Covid-19 pandemic has surely taught us.

Pesticides: UK consumers could be exposed to larger amounts of more toxic chemicals in their food if trade negotiators from the USA have their way. Compared to UK grapes, American grapes are allowed to contain 1,000 times the amount of the insecticide propargite that can affect sexual function and fertility, and has been linked to cancer and miscarriages. American apples are allowed to contain 400 times the level of the insecticide malathion than UK apples. Malathion has also been linked to cancer and can impair the respiratory system and cause confusion, headaches and weakness. The pesticide chlorpyrifos has been shown to negatively affect the cognitive development of foetuses and young children and is banned from use in the UK but is used by farmers in the USA and India. Lowering pesticide standards to allow in produce from the USA would fly in the face of consumer demand: new [YouGov polling](#) reveals that almost three quarters (71%) of the British public want the UK Government to resist US attempts to overturn bans on pesticides, even if this means the “best” trade deal cannot be reached.

Labelling: This is another area in which UK and US policy diverge. Clear labelling of food is a cornerstone of the UK's current public health strategy whereas the US often opposes labelling. In our view country of origin labelling would not address our above concerns as it would not be sufficient to prevent the undermining of UK farmers or the lowering of UK standards.

We would welcome the opportunity to discuss various actions you could take to make it clear to UK consumers that you will not lower food standards. These could include:

- (a) Making a public statement, outlining your commitment to retention of current food standards in the UK as a minimum (both EU standards and where applicable retention of any UK standards higher than the EU's).
- (b) Joining with us to make representation to HM Government about these matters including a joint public letter calling on the Government not to conclude trade deals that require the UK to permit the import of food produced to standards lower than those of the UK nor deals which restrict the use of labelling to indicate details on method, impact or location of production.
- (c) Resistance to the idea that '[cheap food](#)' in trade deals is an advantage to low income consumers where this is predicated on lower standard food and unethical, dirtier or more risky farming practices.