

Middle East FTAs Branch
Regional Trade Agreements Division
Department of Foreign Affairs and Trade

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World Animal Protection welcomes the opportunity to provide feedback on the Government's plans to negotiate a Comprehensive Economic Partnership Agreement (CEPA) with the United Arab Emirates (UAE). Our submission will focus on the potential to incorporate animal welfare sections within a negotiated agreement with the UAE, and the importance of ensuring that animal welfare is formally recognised.

World Animal Protection is a global animal welfare charity, with more than 70 years' experience campaigning for a world where animals live free from cruelty and suffering. We have offices in 12 countries and work across 47 countries. We collaborate with local communities, the private sector, civil society and governments to change animals' lives for the better.

Animal welfare is an important element to consider in any trade agreement. Australia and the UK have recently negotiated a draft free trade agreement which, for the first time, explicitly included a chapter on animal welfare. Our organisation hopes that this is the new way forward, and that all future negotiations, including any discussions for a CEPA with the UAE, will include relevant animal welfare provisions. The CEPA presents a unique opportunity to demonstrate Australia's commitment to animal welfare by taking a strong stand to promote high standards and sustainability. Animal welfare is a relevant consideration for the goal of sustainable development. Animal welfare has implications for all three core components of sustainability including environmental, economic and social aspects. It is important that the department include these considerations to ensure that Australia continues to contribute towards the goals under the 2030 Agenda for Sustainable Development.

Our submission will now turn to several high level concepts that we encourage the department to include in any negotiations with the UAE.

Animal Welfare

1. Animal Sentience

World Animal Protection strongly recommends including explicit recognition of animal sentience within any negotiated agreement, as was done in the United Kingdom Australia Free Trade Agreement (FTA). This is consistent with World Organisation for Animal Health (OIE) guidelines which recognise that animals are sentient beings who can experience pain as well as positive feelings and emotions.¹ Furthermore, the recognition of sentience aligns with the science underpinning the Australian Government's prior Australian Animal Welfare Strategy.² World Animal Protection also recognises the clear connection between improved animal welfare standards that come from recognising animal sentience and the creation of environmentally sustainable food production systems.

2. Cooperation on Animal Welfare in International Fora and Standards Alignment

If negotiations proceed on the CEPA, it should include provisions that encourage cooperation to promote the development of best possible animal welfare practices. This is a crucial step in ensuring that all nations have the most relevant scientific and expert information on animal welfare to ensure the delivery of sustainable outcomes. This provision encourages parties to help improve and broaden the OIE guidelines, particularly regarding farmed animals. Ensuring that the OIE Guidelines are the best they can be is an important task that Australia should be willing to engage with.

Furthermore, the agreement should aim for information exchange on animal welfare, with an aim to align regulatory standards. Ensuring consistent animal welfare standards will help promote more sustainable practices and reciprocity in trade.

¹ World Organisation for Animal Health (OIE), *One Global Animal Welfare Strategy* (Report, May 2017) page 3 < https://www.oie.int/fileadmin/Home/eng/Animal_Welfare/docs/pdf/Others/EN_OIE_AW_Strategy.pdf>

² Department of Agriculture, Water and the Environment, 'Australian Animal Welfare Strategy and National Implementation Plan' (accessed November 2020) < <https://www.agriculture.gov.au/animal/welfare/aaws/australian-animal-welfare-strategy-aaws-and-national-implementation-plan-2010-14#part-1-the-australian-animal-welfare-strategy>>

3. Live animal exports

The UAE is a significant importer of live Australian sheep. In 2021, Australia exported approximately 81,000 sheep to the UAE, making it Australia's second largest market for live sheep. Live sheep exports raise significant welfare concerns for Australian animals. World Animal Protection would encourage the department to consider alternative trades that could be negotiated under the CEPA that do not produce poor welfare outcomes. In particular, we encourage the department to look at humane and sustainable protein options including exports as part of the growing plant-based industry. Research indicates that growing demand in global markets including the Middle East will present unique opportunities for Australian producers of plant-based proteins in years to come.³ For the remaining demand for sheep, any agreement should prioritise the trade of chilled and frozen sheep meat. A number of studies from the last decade have indicated the financial viability of this alternative for Australian producers and processors, including those exporting to the UAE.⁴ These two alternatives would help ensure Australian sheep did not suffer poor welfare outcomes on long sea voyagers, while still providing producers and exporters with valuable trade opportunities.

Antimicrobial Resistance (AMR)

1. AMR risk and Common Priorities

The World Health Organisation (WHO) chief recently labelled AMR "one of the greatest health threats of our time."⁵ This issue is closely related to animal welfare given the extensive over-use of antibiotics on farmed animals. It is also relevant to the broader goal of the Government regarding trade and sustainable development. World Animal Protection encourages the department to include recognition of this within any negotiated agreement. We would encourage the use of similar wording to that included in the recent UK Australia FTA, which held that AMR 'is a serious threat to human and animal health' and that the parties should work together to identify common priorities.

³ Food Frontier, *Meat the Alternative* (Annual Report 2020) p 17.

⁴ Market Vision, *Live, Chilled, and Frozen Meat (sheep) Trade, GCC: Market study focused on the UAE, Kuwait, Qatar and Bahrain* (Report 2011, Commissioned by WSPA) p 11.

⁵ Robin Millard, 'Antimicrobial Resistance as Dangerous as Pandemic: WHO' (Yahoo News Online, 21 November 2020) < <https://au.news.yahoo.com/antimicrobial-resistance-dangerous-pandemic-170128886.html> >

2. Surveillance, Monitoring and Stewardship

World Animal Protection supports the development of a harmonised system for surveillance and monitoring of AMR, with transparent reporting on the species, production system and category of all antibiotics used for farm animals. A negotiated agreement between Australia and the UAE is a unique opportunity to cooperate on this important issue, to help improve antimicrobial stewardship across both countries. A stewardship program that encourages responsible use and reduction in antibiotics where possible would help both countries address the growing threat from AMR.

Conclusion

We thank you once again for the opportunity to be involved in this process. We are available for comment if any further information is required to clarify the positions in our submission. We would also like to be kept informed of any future consultation opportunities. With offices based in both Australia and around the world, we are well placed to help provide input on relevant animal welfare standards and guidelines, in order to help achieve your objectives around sustainable development. We consent to this submission being published.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ben Pearson', with a long horizontal flourish extending to the right.

Ben Pearson

Country Director

World Animal Protection Australia and New Zealand