

## Executive Summary

- Leaving the EU represents an opportunity to continue to raise animal welfare standards in the UK, but there are also threats and challenges arising from this decision
- This briefing details the impact that 5 different Brexit scenarios can have on specific areas related to animal welfare; it summarises the threats and opportunities brought by each model
- The UK will lose full access to TRACES under all options except remaining an EU Member State. Losing access could lead to increased checks on animals at borders
- The UK will lose access to institutions such as the European Centre for the Validation for Alternative Methods (ECVAM) and the European Chemicals Agency (ECHA) under all options except maintaining access to the Single Market and contributing to the EU budget. Losing access could increase the risk of duplication in animal safety testing, and slow down progress with the developments and acceptance of humane alternatives.
- In all Brexit scenarios, the UK will have the ability to change its farm support system to better prioritise farm welfare
- If the UK concluded a Customs Union with the EU, it would limit its ability to conclude comprehensive FTAs with other partners due to the existence of shared external tariffs, but it would also allow the elimination of checks on origin at the EU-UK border, reducing waiting times. Checks on animals could even be fully eliminated if regulatory equivalence on animal health occurs on top of the CU
- Reverting to WTO rules would mean the UK would have to seek new markets for imported farm products, leading to a race to the bottom on welfare standards
- If the UK reduced its agricultural tariffs (outside the framework of specific FTAs), it would have to trade with every country under such low tariffs, also leading to undercutting UK welfare standards with lower standard products
- The UK will be able to better defend and promote animal welfare through its trade policy, however it might face difficulties as it will have a smaller market to bargain with
- The UK may not be able to ban live exports or imports of puppies and kittens over 15 weeks if it remains in a Customs Union with the EU



- In all scenarios (except the EEA and EU ones), the UK will be able to increase the number of checks on animal imports and exports at our ports and elsewhere; this would need additional resources but would increase biosecurity and aid enforcement on non-compliant movements of animals.

## Introduction

The UK started its Brexit negotiations with the EU on 19 June 2017 and has until 29 March 2019, or rather the end of 2018 if you take into consideration the required ratification procedures on both sides, to conclude those negotiations, agree a transitional arrangement or leave without any agreement. The Joint Report on "Progress during Phase 1 of the negotiations" agreed in December 2017<sup>1</sup> seems to favour a Deep and Comprehensive Free Trade Agreement (DCFTA) approach with the EU, underlining the importance to protect North-South cooperation on the island of Ireland by preventing any hard border. If not possible, the UK would have to "maintain full alignment with those rules of the Internal Market and the Customs Unions".

On 29 January 2018, the EU adopted its guidelines for the negotiation<sup>2</sup> of the transitional agreement with the UK. There appears to be disagreement on the length of the transition period (December 2020 for the EU and March 2021 for the UK) and on whether the UK will have any say in the EU legislative process during that period. The Transitional Agreement must be agreed before Brexit date (March 2019) as a ratification process is needed. The EU believes negotiations must be over by October 2018 while the UK believes it should be December 2018. The UK also wants to be able in the transitional period to opt out of new EU rules that it objects to, a demand the EU has so far refused. Several disagreements must thus be resolved before any agreement on the transition period can be signed.

While the UK had said previously that its goal was a DCFTA model, it is now using the wording "Customs Partnership" or arrangement.<sup>6</sup> This "partnership", as expressed by Prime Minister May on 5 February 2018, will not entail any involvement with a customs union with the EU.

This paper does not intend to take any position on the different options available to the UK to leave the EU. Our objective is to see a scenario where animal welfare standards are retained and improved and where funding to animal welfare, particularly farm support payments, delivers good animal welfare outcomes. The arrangement the UK currently has inside the EU is a high level of animal welfare standards protected by external tariffs. This should be retained in any future trade arrangement the UK will have with

the EU and with other trade partners, to prevent the race to the bottom that could arise from a surge in imports of products produced to lower animal welfare standards. The opportunities and results we wish to see, as well as the main threats, can be summarised in five areas:

- Legislation and domestic standards: around 70% of the animal welfare rules currently applied in the UK originate from Brussels; these are being nationalised through the EU (Withdrawal) Bill but we wish to see them then improved;
- Domestic support of agricultural production: the UK currently pays £3.1 billion in farm payments annually; we want a new farm support system which prioritises animal welfare payments and scraps the old payments based on size of the farm;
- Trade in live animals and products: we want to see movement of animal-based products and live animals which help to guarantee good welfare (e.g. no long hold ups at the border, no unnecessary increase of the journey time) and ensures through veterinary equivalence and tariff levels that there is no race to the bottom on welfare standards;
- Dispute Settlement Mechanisms: as we move away from the ECJ system we want to see a legal resolution framework that is transparent and open to all;
- Trade agreements: we want to see the UK keep and raise its welfare standards, as well as promote better standards in other partners' territories, through its newly independent trade policy (it will have to grandfather the 65 or so free trade agreements concluded as part of the EU, and then to negotiate new ones with other countries)

This briefing uses five different models of exiting the EU that have been suggested in the current debate. The objective is to examine the impact that each scenario would have on animal welfare standards in the UK. First, there are two issues for which each scenario of leaving the EU will give the same result: the ability to implement a new farm support system and the denied access to the full TRACES system.

## Domestic Support & the Common Agricultural Policy (CAP)

The EU's Common Agricultural Policy (CAP) only applies to Member States. In every scenario, the UK will be able to design its own farm support system.

- The UK could design a more animal welfare oriented system. It could decide what level of payments it will give to farmers and utilise the newly built scheme to further incentivise animal welfare through direct payments, place a cap on subsidies, and direct those subsidies towards programmes the UK's devolved nations want to prioritise.

## TRACES (TRAdE and Control Expert System): Tracking live animal movements

The TRACES system is used by Member States to track live animals moved commercially into or within the EU. While non EU countries may introduce and consult documentation through the system, only EU member states can use TRACES tracking functions. The system only applies to EU member states' territories, and cannot be extended to a third partner. TRACES helps to ensure the respect of EU regulations notably related to food safety and animal health.

In any of the five scenarios outside the EU, the UK will have to create its own tracking system as UK exporters will be able to use TRACES to submit information, but the UK authorities will not be able to use it to track shipments. TRACES underpins the Tripartite Agreement which regulates trade between Ireland, UK and France in horses. The Agreement will have to be renegotiated.

- Renegotiating the Tripartite Agreement could impact on the trade in high value and low value horses across the three countries. It could also contribute to reducing potential delays at the borders and thus minimise journey times, particularly for 'high health' equines.

On other issues, the impact on welfare will depend of the model that is adopted by the EU and the UK. These are now examined for each of the five scenarios.

## The "European Economic Area" model (the Norwegian model)

### What does this mean?

The agreement setting up the European Economic Area (EEA) has been signed by the EU and the European Free Trade Association (EFTA). The European Economic Area is composed of the EU and three of the four EFTA countries (Lichtenstein, Iceland and Norway, but not Switzerland as it did not ratify the Treaty on the EEA).

This model covers a scenario in which the UK would either join the EEA agreement or establish bilaterally a similar arrangement with

the EU. To join the EEA, the UK would need to join EFTA and its accession would have to be approved by all other EFTA members; hence it is not automatically feasible.

## How would it affect animal welfare?

**Border measures** - EEA countries have considerable, but not unlimited, access to the European single market in industrial goods. However, tariff barriers are still applied to agricultural and fisheries products. The EEA is a very deep FTA, not a customs union. This means that goods from EEA countries need to prove they respect the "Rules of Origin" (RoO) contained in the EEA agreement. If the UK was to set a similar agreement bilaterally, it could cover agriculture as well.

- Being part, to a certain extent, of the Single Market, the UK would not be able to introduce specific border measures that diverge from EU standards (e.g. ban live exports of animals or ban imports of puppies under six months).
- Customs procedures would be necessary as the UK would not be part of a customs union with the EU. Border procedures such as those related to the "Rules of Origin" (the requirement to prove the origin of a product), will be reintroduced.
- As the UK would participate in certain aspects of the Single Market, there would have to be regulatory equivalence in those fields. Therefore it would be possible to agree a veterinary agreement and to get veterinary health and animal control barriers to be lowered, or even removed.
- The Norway/Sweden border represents a fair example of this model: border procedures still exist, but they are reduced compared to other models.

**Regulations** - The vast majority of EU animal welfare laws apply within the EEA, therefore meaning that were the UK to join EFTA and then the EEA agreement, it would have to continue observing EU standards, just as now. In policy area where there is regulatory alignment with the EU, the relevant rulings of the ECJ will have to be followed, or another dispute settlement mechanism, similar to EFTA courts, will have to be set up.

- The UK would continue to observe EU animal welfare standards but, as a non-member, it would have little influence over creating new standards or setting higher standards.

**Regulatory Agencies** - EEA states continue to make budgetary contributions to the EU and are thus members of bodies such as the European Chemicals Agency (ECHA) and European Centre for the Validation for Alternative Methods (ECVAM).

- ECHA's responsibilities are to grant "market authorisation" for chemicals, and to monitor the use of new testing methods. This body underpins the REACH legislation, which, among others, aims to avoid unnecessary animal testing by ensuring that chemicals are only tested on animals as a last resort. Companies registering chemicals are obliged to share information on their hazardous properties by jointly submitting that information to ECHA. Companies producing or importing the same substance are obliged to work together and share the results of their tests on vertebrate animals, such as fish, rabbits or rats. Membership of ECHA, and ECVAM, would reduce repetition of reliable and adequate studies involving tests on vertebrate animals.

- There is no alternative body in the UK that is funded to replicate either ECHA or ECVAM. An EEA-like agreement, including contribution to the EU budget, would thus allow to maintain the UK membership to those bodies.

**Trade policy** - EFTA members are not in a customs union and the EEA agreement is not a customs union either. EFTA countries are allowed to negotiate their own free trade agreements, fix their own external tariffs and have a trade policy separated from the EU's. EFTA also has a coordinated trade policy and negotiates joint agreements between EFTA and third partners. Obviously as EEA countries do respect most of the regulations that are produced in Brussels, it reduces their flexibility in terms of what they can offer the third partner.

- If the UK becomes part of EFTA, it could be party to the 27 trade agreements mentioned above that have been negotiated by EFTA as a whole.

- The UK would not be constrained by a common external tariff, but possibly by the regulatory alignment that derives from accessing the Single Market.

- If the UK were to become a member of EFTA and a party to the EEA agreement, it might be easier for the UK to agree on grandfathering trade deals with third partners who have FTAs with both the EU and the EEA. However as EU agreements tend to be more comprehensive even this may not be that simple.

## 2. The 'Swiss model' option

### What does this mean?

The Swiss model implies the establishment of a plethora of specific bilateral agreements between the partners, rather than a comprehensive one. As a member of EFTA, Switzerland started in a similar place to the countries now in the EEA. However, as it decided not to ratify the EEA agreement, it negotiated access to the EU's internal market via a series of bilateral deals, including one on agriculture.<sup>3</sup>

### How would it affect animal welfare?

**Border measures** - The Swiss agreements allow for the free movement of agricultural goods between the EU and Switzerland. They also provide the basis for a 'common veterinary area'.

However, agricultural products, including those that are animal based, are still protected behind significant tariffs, notably the imports and exports of meat and of certain processed agricultural products. The range of any bilateral agreements between the EU and the UK could be different in certain aspects but for the sake of the analysis, we will consider Switzerland's situation.

- There would be checks at the border regarding the origin of the products/animals.
- If a veterinary agreement, as well as other agreements that might be required such as concerning transport, are included in the set of agreements signed by the EU and the UK, veterinary checks could be eliminated at the border between the UK and the EU.

**Regulatory Agencies** - Switzerland is not a member of the ECHA or ECVAM. It would cost tens of thousands of pounds to set up a new body.<sup>4</sup>

- The UK would have to establish key regulatory agencies to allow for the smooth functioning of regulatory requirements which may impact on duplication of tests (see above). Trade policy - Switzerland is not part of a customs union with the EU and leads its own trade policy. It is however constrained by what is agreed with the EU on a regulatory level.
- The UK could negotiate its own bilateral trade deals, with any regulatory constraints it decides to adopt.

### 3. Customs Union (CU) option

#### What does this mean?

Under a CU, customs duties on goods are eliminated between members and common external tariffs are set on products imported from countries that are not members of the CU. The establishment of a customs union only impacts the trade in goods. Historically a Customs Union was seen as a step towards economic integration and often accompanied by additional regulatory alignment (though this is not mandatory in a CU).

The EU-Turkey CU (which only allows tariff-free access in industrial goods, including goods related to veterinary medicines, and in processed agricultural goods) and EU-San Marino CU (which covers agricultural goods) will be used as examples.

#### How would it affect animal welfare?

**Border measures** - In a Customs Union, members do not need to prove the origin of the goods they are trading. This means that there is no application of "Rules of Origin" (RoO), and no subsequent checks at the border. An EU-UK customs union could cover all sectors of goods, including live animals.

- There would be no checks on the origin of the products/animals but paperwork could still be needed at the border.
- Lack of checks regarding the origin of the products (the animals in this case) would mean reduced delays at the border.
- Other checks, such as veterinary ones or ones allowing unlimited access for transporters, would depend on whether the UK agrees on regulatory alignment with the EU in that field. If it does not, checks will be necessary and, as shown by the Turkish case, it can lead to huge delays and thus to animal welfare challenges at the border.<sup>5</sup>
- Providing there is veterinary standards equivalence, trade could become almost frictionless, so avoiding the animal welfare problems that would arise in the event of border delays. This is particularly important as there are large amounts of trade in the island of Ireland, especially in sheep and dairy sectors.
- Banning trade in certain animals, such as live exports of animals or imports of puppies, may be problematic if those animals are covered by the CU.

**Regulations** - A Customs Union per se does not address the issue of regulatory convergence or alignment. This comes on top of the CU, either in another agreement or as part of it. For instance the EU-

San Marino CU covers agricultural products but mandates San Marino to adopt the EU's veterinary regulations "necessary for the proper functioning of the agreement".

- Provided there is additional regulatory equivalence on veterinary standards, no customs checks need be applied on animals crossing the border between the EU and the UK.

**Regulatory Agencies** - Turkey is not a member of ECHA and ECVAM. A Customs Union is not designed to address those matters.

- the UK would have to establish key regulatory agencies to allow for the smooth functioning of regulatory requirements which may impact on duplication of tests (see above).

**Trade Policy** - As members of a customs union share external tariffs, they are only free to lead their own trade policy insofar as it does not impact those shared tariffs.

- The UK would be unable to freely carry out its own trade policy on areas that would be covered by the CU.
- If regulatory alignment is introduced on top for certain sectors covered by the customs union, UK's trade policy would be even more constrained as it would not be able to diverge from adopted EU's standards.
- Being in a customs union with the EU could make it easier for the UK to grandfather the 65 or so existing EU FTAs, but the EU would still have to agree to this, as would the original FTA country. The CU option simplifies the situation in terms of trade in goods (and Rules of Origin), but not regarding other aspects of FTAs that are important to the UK, ie services and public procurement.

## 4. A (Deep and Comprehensive) Free Trade Agreement (DCFTA)

### What does this mean?

Free trade agreements are all different and each is a product of its own unique negotiation and of the context around it. While the UK has now stated it wanted a "Customs Partnership" (aka a Customs Union) with the EU6, it has also supported the idea of concluding a DCFTA with the EU4. It is assumed that an EU-UK DCFTA would cover all farm products and live animals and keep low, or even no, duties and tariffs on the majority of goods.

To date, the most comprehensive free trade agreement that the EU has struck is the EU-Canada Comprehensive Economic Trade Agreement

(or CETA), which made 98% of the goods moving between the two territories tariff-free - either immediately or within four years. Nevertheless, Canada had to accept tariff-rate quotas (a lesser form of liberalisation) on specific agricultural products - including on live animals.<sup>7</sup>

The EU has traditionally used DCFTAs with partner countries that are economically weaker as a step towards closer integration with the EU (eg Ukraine, Moldova and Georgia). An EU-UK DCFTA would be negotiated in a very different context.

## How would it affect animal welfare?

As a free trade agreement might take very different shapes, the impact on animal welfare of an EU-UK (DC)FTA could change entirely depending on the depth of the text agreed.

**Border measures** - An FTA is not a customs union but it always contains 'Rules of Origin', which are a key component of the agreement.

- However deep an EU-UK DCFTA is, the origin of the products/animals will have to be proven at the border, in respect of the RoO contained in the agreement.
- Ensuring bilateral tariff-free access to and from the EU market would ensure the UK could maintain and improve its farm welfare standards. Though this varies between sectors (69% of UK pig exports go to the EU compared to 98% of beef), the EU is the main market for all the UK farm products. This dependence is not only on the UK side, the EU and UK markets are really pivotal to each other for farm trade.<sup>9</sup> 98% of UK beef exports go to the EU, and 90% of UK beef imports come from the EU.
- Concluding an FTA (or DCFTA) could allow to maintain zero tariff trade in agricultural products between the EU and the UK while maintaining higher tariffs with other partners, protecting the UK market from cheaper low-standards imports. Tariff-wise, this would be a "business as usual" scenario.

**Regulations** - the degree of regulatory alignment depends on negotiations, yet the more aligned the UK commits to be, the less friction there will be at the border. Regulatory alignment with the EU would however imply a recognition of relevant past and future ECJ rulings.

- Without regulatory alignment, veterinary and animal health checks will be required on the border between the UK and EU, which might create trade disruption. Given that, at present, the UK exports

£4.7bn of animals and animal derived products to the EU 27, and imports products amounting to £9.7bn from the EU 27, the sheer volume of trade would require adequate systems to ensure that animal welfare is not compromised during border checks. Any situation comparable to the EU-Turkey border would impact hugely on live animal trade, and on the animals themselves.

- If the EU and the UK agree on regulatory alignment in veterinary standards, it would be possible to reduce and even eliminate veterinary checks at the border.
- If the UK and the EU agree on regulatory alignment, and if this implies minimum standards, the UK would still be able to set its own import regime on farm or tested products, as long as they are higher than the ones agreed with the EU. They might however have to defend those import restrictions at the WTO if other countries object.

**Trade policy** - The UK can have their own trade policy. However, as indicated earlier, this policy can be constrained by the regulatory commitments made to the EU. For instance, under the EU-Ukraine DCFTA, the Ukraine has agreed to align its standards with European ones in several fields, among others animal welfare. Ukraine is thus less able to negotiate new FTAs with other countries as it cannot bargain away those standards.

- The UK may use this DCFTA as a model, but, as the UK would not be able to diverge from regulatory commitments it has agreed with the EU, it would limit its ability to offer different trade terms to other countries. From another point of view, it would also enshrine that the UK cannot bargain away its high animal welfare standards.
- If Rules of Origin have to be applied this will involve checks at the border, impacting on the welfare of animals being traded but allowing better checking.
- The UK will have to insist on transferring any bans or non-tariff barriers it agrees to transpose within the EU DCFTA to other FTAs, to prevent re-export problems. There are a number of non-tariff barriers that impact on animal welfare such as the present ban on beef-hormones and on the use of growth promoters in pig farming, as well as the ban on chicken-chlorine washing. Keeping such bans is good for animal welfare and the UK has stated it wishes to do so but other countries, particularly the USA, will want the UK to relax these rules and might take the opportunity to attack the UK at the WTO.
- Adopting strong regulatory convergence in various fields would also limit the UK negotiating power in non-farm animal-related issues. For instance, China requires cosmetics to be tested on animals, yet since March 2013 the EU and UK law refuse the use of

animal testing to get market approval for cosmetic products. At present UK firms submit their products to be retested to enter China's market but Chinese products tested on animals cannot access the British market.

## 5. Reverting to WTO rules

### What does this mean?

If the UK leaves without any trade agreement, it will have to revert to WTO rules. How would it affect animal welfare? Border measures - the UK will have to trade under the Most Favoured Nation (MFN) rule, which means it has to apply the same tariffs to every WTO member, unless it has a preferential trade agreement in place with that member.

- The UK will not be able to choose to set higher tariffs for certain countries to prevent imports of specific products, respecting lower standards than those applied in the UK, or reversely, to set lower ones to favour imports from countries with equivalent standards.
- The UK is likely to inherit its WTO tariff schedule from the EU and therefore will not be able to apply to imports from the EU - and from other third countries - higher tariffs than the EU's Most Favoured Nation tariffs, where the highest are around 30-50% for certain farm products.
- the EU will be able to apply the level of tariffs it applies to imports from third countries to the UK, which average around 4% but are much higher on agricultural products.
- Trade between the EU and the UK on any goods would be subject to checks on origin at the border.
- If the UK reduces its MFN tariffs from the current ones, which are high in farm products (e.g. over 30% for dairy and beef ; 10-30% for pork, poultry and eggs), it would have to apply these reduced tariffs to all imports. This could lead to increased imports of cheap products produced at standards below the UK's, and in turn put pressure to intensify farming in the UK, lowering farm welfare standards to produce more or to compete with lower standards cheaper imports.<sup>8</sup> This will have a huge impact on farm animals and animal welfare standards.
- If there is no deal, exports to the EU and imports from the EU could be expected to fall by 62%.<sup>11</sup> British farms would quickly be expected to make up for large shortfalls, particularly in the very

vulnerable pig sector. If there is an overall reduction in supply, prices are likely to increase.<sup>10,12</sup>

- The UK will not be able to have different rules on import and export to Ireland than to other countries; Ireland is an important country for trade in horses, dairy animals, sheep and products.
- There could not be borderless trade on the island of Ireland.

**Regulations** - there is nothing preventing the UK and the EU to work towards some regulatory arrangements in specific sectors that could lead to reduced border controls. However if both countries could not agree to such arrangements in the context of trade negotiations, it seems unlikely that they decide to agree on them outside of more comprehensive talks.

- In the absence of regulatory arrangements, official controls and inspections would be required when a product is shipped between the two countries.

## Trade Policy

- With the EU market closed due to high tariffs, the UK would have to seek new markets for imported farm products. This risks a race to the bottom as most other countries do not have the same high animal welfare standards as the UK. To prevent that, it will be essential for the UK to negotiate ambitious free trade agreements covering most products imported into its territory, with sufficiently strong wording on animal welfare standards so that only products that meet British standards can be allowed in.
- Traded products need to meet globally agreed standards on animal health. The UK has specific bans on imports of certain products such as hormone beef or chlorine-washed chicken which are, or could be, contrary to WTO rules. As the UK will have to negotiate new agreements, it could be under pressure to overturn these bans. This is underlined by the US position where it hopes to negotiate these standards away with the UK.

## Conclusion

The objective of this paper is not to assess which model the UK should pursue in its future trade negotiations with the EU. However it sets out the impact such scenarios might have on animal welfare and the opportunities that could be seized to improve our own regulation in the field.

Out of the EU, the UK will be able to design its own farm support system in a way that better favour animal welfare. It will have to

create a system equivalent to TRACES, and in many scenarios, and create regulatory bodies that would take over ECHAM and ECVA's role in avoiding animal test duplications. Any checks on animals, products or veterinary matters at the border, whilst providing a better enforcement opportunity, may lead to delays, which can in turn lead to difficult conditions for the animals in terms of welfare. Being outside the Single Market and possibly the CU, will allow the UK to adopt more restrictive border measures - like a ban on live exports or on imports of puppies younger than 15 months. However, the UK might have to defend these import restrictions at the WTO. Out of a CU with the EU, the UK will be able to drive its own trade policy, which will only be constrained by the regulatory commitments that it undertakes with any trade partner. The UK will thus have to defend the high standards the UK has on animal welfare in its endeavour.

Were the UK not to maintain current trading arrangements with the EU, we would urge for the UK to find ways to maintain and improve existing animal welfare regulations, avoiding any race to the bottom, and to implement new measures to better protect the welfare of animals, such as a ban on live exports, extra control on the movement of dogs and cats and a reshaped farm support system that would better foster animal welfare.

## Annex - Animal Welfare and Brexit Scenarios

The table below summarises threats and opportunities to animal welfare standards on several issues. Obviously those issues are not equally weighted and are listed alphabetically rather than in priority order. Each NGO that signed up and contributed to this briefing has different priorities depending on its area of work. In addition, certain issues are not dichotomic. The UK does not lose or gain an ability to defend trade restriction based on animal welfare or to promote better welfare in partner countries based on each scenario. However, this ability might seriously decrease with the loss of the access to the EU market as leverage particularly for farm animals. This could have a very detrimental long-term impact on animal welfare in the UK (see above the points on race to the bottom regarding standards) but it cannot be represented in the table below. In addition, it is also recognised that whilst every scenario is theoretically possible the reality of international trade deals means that some of the best outcomes for animals will be very difficult to achieve unilaterally by the UK.

The scenario envisaged in the case of the Customs Union (CU) and of the Deep Comprehensive Free Trade Agreement (DCFTA) are not country specific. A question mark indicates that the outcome is feasible under that scenario but depends on the negotiations that will define depth and scope of the agreement.

Animal welfare issue	Different models of relations with the EU 27					
	EU	EEA	CH	CU	DCFTA	WTO
Ability to ban live exports for further fattening and slaughter	✗	✗	✓	✗	✓	✓
Ability to introduce method of production labelling	✗	✗	✗	✓	✓	✓
Ability to introduce new farm support system which encourages higher animal welfare	✗	✓	✓	✓	✓	✓
Ability to participate in the Pet Travel Scheme (PETS)	✓	✓	✓	✓	✓	✓
Ability to reintroduce extra veterinary requirements for dogs and cats moved via non-commercial means into UK	✗	✗	✓	✗	✓	✓
Continued ability to maintain a ban on the testing of cosmetics on animals	✓	✓	✓	✓	✓	✓
Continued collaboration with key EU regulatory agencies / enforcement bodies	✓	✓	✗	✗	?	✗
Continued full access to TRACES (tracking of shipment and use within the territory)	✓	✗	✗	✗	✗	✗
Tariff-free access for agricultural goods	✓	✗	?	✗	?	✗
Tariff-free access to veterinary medicines	✓	✓	✓	✓	?	✗
Unimpeded movement of animals between the EU and the UK	✓	✗	✗	✗	✗	✗

**Key:** EU - existing relationship EEA - European Economic Area CH - the 'Swiss model' - EFTA + bilateral agreements WTO - World Trade Organisation CU - Customs Union DCFTA- Deep and Comprehensive Free Trade Agreement

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