# VISION INTO ACTION:
## Applying Animal Welfare Standards in Import Policy

*Navigating Supply Chains, Trade Dynamics, and Economic Opportunity in New Zealand*

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Cover photo: Sows in sow stalls in Canada (2022)
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**A note on report limitations**
The report examines existing legislation, not enforcement, which is an important issue in itself. It does not review optimal farmed animal welfare; continuous improvement in addressing sentience and quality of life is also crucial.

Most trade volume figures provided are the most recent FAO data available from 2023.

In October 2025, Associate Minister of Agriculture (Animal Welfare) Andrew Hoggard proposed amendments to the Animal Welfare Act via a bill that would reduce maximum confinement time in farrowing crates from 33 days to 7 days, with a transition period of 10 years. The proposed legislation fails to comply with a High Court 2020 ruling that ruled in favour of banning farrowing crates. At the time of the launch of this report, the bill is in the Select Committee stage with the decision on future welfare standards for pigs pending.



Pig on a sanctuary in USA (2018)
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# Introduction

This report explores the practicality of applying New Zealand's animal welfare standards to imported products, focusing on supply chain dynamics, economic implications, and the potential for retaliatory actions from trading partners. New Zealand has established itself as a leader in some aspects of animal welfare, with bans on practices like battery cages and sow stalls. However, as highlighted in the 2024 report *"Closing the Welfare Gap: Why New Zealand Must Apply Its Animal Protection Standards to Imports"*, current imports policy allows products from countries with lower welfare standards to enter the market, creating an uneven playing field for local farmers and undermining the wishes of Kiwis.

The primary purpose of this report is to assess the feasibility of aligning import standards with New Zealand's animal welfare principles. It aims to provide stakeholders with a clear understanding of the implications of such a policy change, including its impact on supply chains, the economic consequences for consumers and producers, and the geopolitical landscape concerning potential retaliation from exporting countries.

## Scope of the analysis

The analysis covers:

- **Supply Chain Overview:** Examination of the current supply chains for two key imported products, pork and eggs, and the capacity of exporting countries to meet New Zealand's welfare requirements
- **Retaliation Risks:** A discussion of the likelihood of retaliatory measures from trading partners, considering current global trends towards improved animal welfare standards.
- **Economic Impact:** An evaluation of the potential costs to consumers and the implications for domestic production, including market share shifts and growth opportunities for local farmers.

This report is significant as it addresses a critical inconsistency in New Zealand's animal welfare practices. Over 80% of New Zealanders believe imported products should meet the same welfare standards as those produced domestically. Rather than trade barriers or economic protection, it's about moral consistency. When New Zealand banned sow stalls and battery cages, we made a clear statement about what we consider acceptable. Applying these same standards to imports would simply ensure our entire food system aligns with the principles already established.

By aligning import standards with domestic animal welfare regulations, New Zealand can enhance its reputation as a leader in animal welfare, uphold the will of New Zealanders, while ensuring that local producers are not disadvantaged in a competitive market. The findings of this report will inform policymakers, industry stakeholders, and the public about the benefits associated with implementing these standards.

# Executive Summary

New Zealand stands at a critical policy crossroads in animal welfare. While the country has implemented some progressive domestic standards—banning practices like sow stalls and battery cages—its **import policies reveal a significant inconsistency**. Currently, products from overseas can enter the market without meeting the same animal welfare standards applied to local farmers.

Public sentiment strongly supports closing this welfare gap. **Over 80% of New Zealanders consistently advocate for import regulations that align with the country's established animal welfare principles.** This report examines the feasibility of implementing such a policy, demonstrating that aligning import standards goes beyond being ethically necessary, but is also diplomatically achievable and economically pragmatic.

## Key findings

### 1) Feasibility: Exporters already have the capacity

The analysis reveals that major current exporters to New Zealand already produce more cage-free eggs and pork than needed to supply New Zealand's market. Furthermore New Zealand represents less than 2% of total pork production and less than 0.3% for eggs for all major exporters, refuting concerns about potential supply disruption or hardships for overseas producers.

**Pork: Overseas industry capacity to produce (x) more sow stall and farrowing crate free pork compared to NZ import volumes from that country**

| | Poland | Finland | Spain | Australia | Germany | Denmark | Netherlands | Canada | US |
|---|---|---|---|---|---|---|---|---|---|
| **Sow stall free** | 570x | 22x | 94x | 70x | 251x | 117x | 417x | 39x | 176x |
| **Farrowing crate free** | 491x | 10x | 36x | 8x | 63x | 10x | 21x | * | * |

** industry wide information not available*

Exporters, driven by consumer and regulatory pressure in larger markets, are already producing pork or eggs to higher standards, signalling a readiness within the industry to adapt to higher welfare expectations. For instance:

- Smithfield Foods has converted facilities in the US to meet California's Proposition 12 requirements
- Maple Leaf Foods (Canada) converted 69,850 sow spaces to be sow stall-free
- Sundaily is building China's largest cage-free egg farm with initial capacity of 300,00 hens

The data clearly shows that **major global producers are not only capable of meeting New Zealand's standards but are already producing to some higher standards**. By implementing import restrictions, New Zealand would not be asking these producers to do something they are unwilling or unable to do; rather, it would be providing a clear market signal. This policy would reinforce an existing global trend, rather than stand as a unique or isolated demand.



### 2) Retaliation Risks: Minimal and manageable

Concerns about potential retaliatory measures from trading partners are largely unfounded:

With the country's small market share and most current **trade partners already capable of meeting the proposed standards**, potential responses are unlikely. The global trend towards improved animal welfare, coupled with significant legal and economic barriers to retaliatory actions, suggests that most trading partners would view this policy as a logical step. Furthermore, the diplomatic environment is changing with the European Union independently considering applying its own animal welfare standards to imports, indicating a broader international alignment with New Zealand doing the same rather than opposition.

### 3) Benefits for New Zealand farmers

Aligning import standards will eliminate the current double standard faced by domestic producers, who are required to meet some higher welfare standards while competing against lower-welfare imports. This policy could potentially **increase domestic pork industry output by $17.2 to $29.0 million** through enhanced market share and reinforcing New Zealand's reputation.

### The California Precedent

California's Proposition 12 serves as a model for the success of an imports policy. Despite producing less than 1% of the pork it consumes, California successfully enacted a law that prohibits the sale of pork from animals not raised according to its minimum space standards - applying to imports. This regulation effectively compels out-of-state producers to comply with California's welfare standards to maintain access to its market.

### 4) Price Implications: Minimal impact, maximum value

Implementing import animal welfare standards would result in a negligible price increase for consumers. Price impact analysis reveals that the estimated additional cost for pork would be **only $0.25 per person per week, based on average consumption and represents just 0.22% of average weekly household food costs**. Furthermore, a survey revealed New Zealand consumers already indicate a willingness to pay 19% more for higher welfare products. The proposed policy effectively removes the hidden costs of unethical production while aligning market prices with consumers' ethical expectations, making the welfare-driven approach not just morally sound, but economically sensible.

## Recommendations

New Zealand should implement legislation requiring imported animal products to meet the same welfare standards applied domestically, starting with eggs and pork. This policy would:

- **Uphold New Zealand commitment** to higher animal welfare
- **Provide a clear roadmap for international producers** seeking to maintain access to the New Zealand market and who are already capable of compliance
- **Support domestic farmers** through consistent application of standards
- Create certainty for New Zealanders with only a negligible cost increase

The evidence is compelling: requiring imports to meet New Zealand's animal welfare standards is not only morally justified but economically feasible. With exporters already producing sufficient higher-welfare products and minimal consumer cost impact, New Zealand has the opportunity to close the welfare gap and ensure our food system truly reflects our values. **It is time for decisive action to align our import standards with our ethical commitments and strengthen our position as a global leader in animal welfare.**



Piglet on a sanctuary in USA (2018)
© Jo-Anne McArthur: We Animals Media

*Having been in the NZ pig meat industry since 2006, I reckon pigs should always be in an environment that allows them to display their natural behaviour. That's why we are supporting a ban on imports of all animal products that don't meet NZ's animal welfare standards.*

*Lets keep our market fair so that more NZ farmers can move away from cages without facing competition from overseas farmers who farm animals in sad conditions.*

**Cameron Fyfe**, Co-founder of Freedom Farms



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Young chick in Mexico (2018) © Jo-Anne McArthur / Animal Equality / We Animals Media

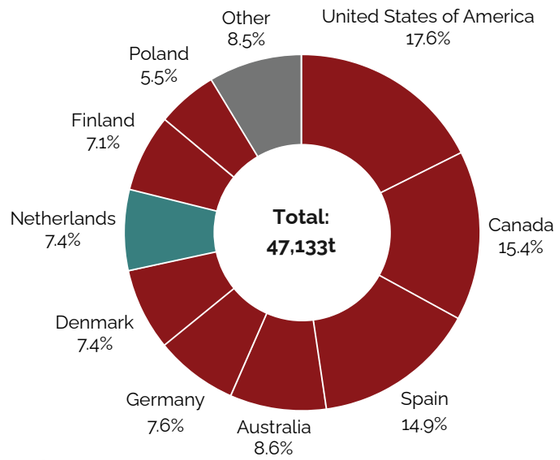
# Applying Welfare Standards to Imports: Pigs

In 2023 (latest FAO figures), New Zealand imported 47,133 tonnes of pork, primarily from the US, Canada, Spain and Australia, which equates to approximately 486,000 pigs.[1]

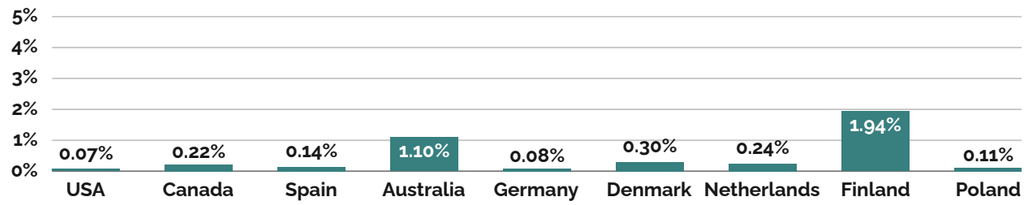
For all exporting countries, the New Zealand market constitutes a small segment of their overall exports and pork production. Consequently, enacting import regulations that align with domestic animal welfare standards would have a limited effect on trade flows.

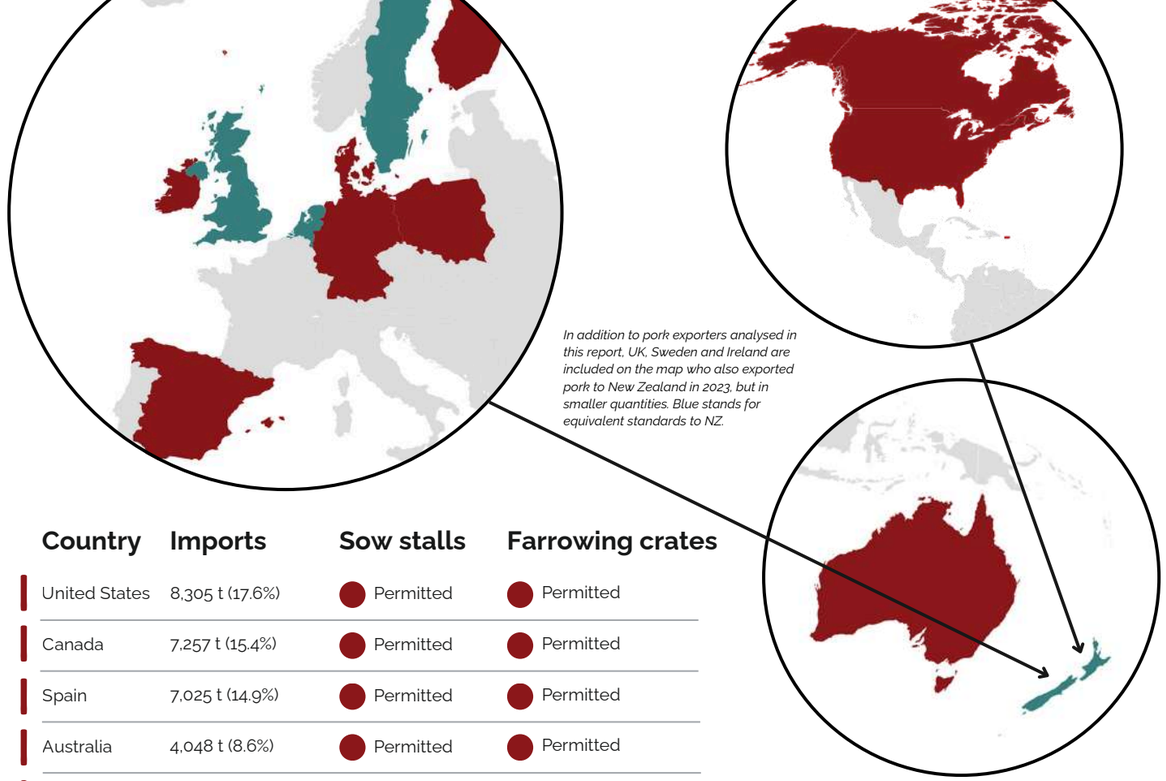
Moreover, many of these exporters are large multinational corporations that have already implemented some higher welfare standards in parts of their supply chains, or have indicated progress towards such standards. Nonetheless, a proactive policy that prevents the importation of lower welfare products is still needed to ensure that *only* higher welfare products are exported to New Zealand.

**Pork imports in 2023**




**New Zealand accounts for less than 2% of exporters' total pork production**



*In addition to pork exporters analysed in this report, UK, Sweden and Ireland are included on the map who also exported pork to New Zealand in 2023, but in smaller quantities. Blue stands for equivalent standards to NZ.*

| Country | Imports | Sow stalls | Farrowing crates |
|---|---|---|---|
| United States | 8,305 t (17.6%) | Permitted | Permitted |
| Canada | 7,257 t (15.4%) | Permitted | Permitted |
| Spain | 7,025 t (14.9%) | Permitted | Permitted |
| Australia | 4,048 t (8.6%) | Permitted | Permitted |
| Germany | 4,048 t (7.6%) | Permitted, banned from 2029 | Permitted, limited to 5 days from 2036 |
| Denmark | 3,489 t (7.4%) | Permitted, banned from 2035 | Permitted |
| Netherlands | 3,489 t (7.4%) | Limited to 4 days | Permitted |
| Finland | 3,326 t (7.1%) | Permitted, 8 day limit from 2035 | Permitted |
| Poland | 2,607 t (5.5%) | Permitted | Permitted |
| New Zealand | - | Banned | Permitted, proposal to limit to 7 days from 2035 |

To access the full data behind this report, **scan the QR code** or go to **animalpolicyinternational.org/NZ-data**

## Pig welfare in New Zealand: sow stalls and farrowing crates

The use of sow stalls and farrowing crate cages are regarded as the primary welfare issues for pigs.

Following a public outcry, New Zealand banned sow stalls, in which pregnant pigs are confined to narrow cages during their pregnancy, in 2016, although mating stalls can still be used for up to 7 days.[2] Despite this ban, most countries exporting pork to New Zealand (~90% by volume in 2023) continue to permit the use of these cages.

In addition to banning sow stalls, New Zealand is expected to implement a ban on the use of farrowing crates, cages where mother pigs are confined during and after giving birth, following similar public outcry. In 2020, a High Court ruling deemed farrowing crates unlawful as they breach the Animal Welfare Act. Consequently, the Government passed regulations phasing out their use by 2025.[3]



Sows in sow stalls in Canada (2022)
© Jo-Anne McArthur / We Animals Media

In October 2025, Associate Minister of Agriculture (Animal Welfare) Andrew Hoggard proposed amendments to the Animal Welfare Act that would strengthen the requirements but would bypass the High Court ruling for banning farrowing crates entirely.[4] The proposed amendments include:

- **Farrowing crates:** maximum confinement time reduced from 33 days to 7 days
- **Mating stalls:** time reduced from 7 days to 3 hours at a time
- **Grower pigs:** space increased by 13%

Farrowing crates are banned or restricted in many countries globally. Three countries, Switzerland, Sweden and Norway, have prohibited their use.[5]



Pigs in farrowing crates in Poland (2017)
© Andrew Skowron / We Animals Media

# Pork Exporters Can Comply

## Spain

**Spain already produces 94x more sow stall-free and 36x more farrowing crate free pork than needed for NZ exports**




Spain still currently allows the use of sow stalls for the first four weeks after insemination, in line with EU Directive 2008/120/EC. The use of farrowing crates is also allowed. This situation may soon change - in early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages".*[6]

Compassion in World Farming estimated in 2023 that 13% of sows in Spain are no longer kept in sow stalls and 5% no longer in farrowing crates.[7]

**Spain's pork exports to New Zealand**

Spain exports a mere **0.14%** of its total pork production to NZ

NZ represents only **0.32%** of its total pork exports

NZ is its **30th** pork export destination in volume

## Key findings

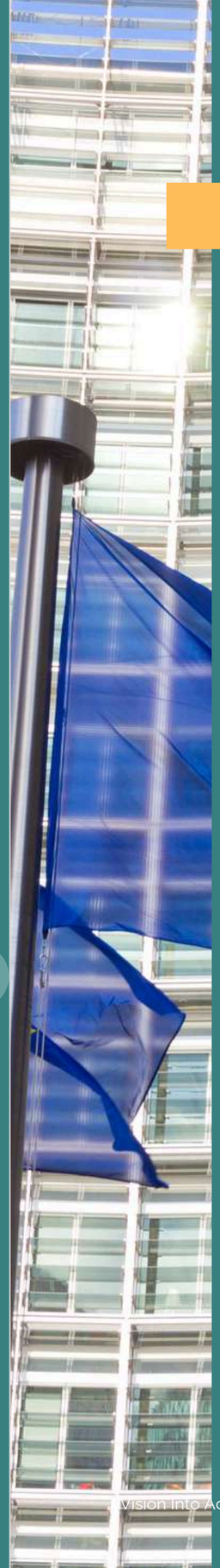
- The proportion of Spain's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 94 and 36 times**, respectively.
- To maintain the current amount exported to New Zealand, Spain only needs to **increase sow stall free production by 1.06% and farrowing crate free production by 2.76%**.
- This demonstrates that requiring welfare compliance would not create supply constraints for Spain's exporters.



Sow in sow stall in Spain (2009) © Jo-Anne McArthur / Animal Equality / We Animals

The largest pork producers and exporters in Spain, Vall Companys Group and Jorge Group have not made specific public commitments regarding the elimination of sow stalls and farrowing crates. However, the Vall Companys Group is working with certification bodies and claims to be developing higher animal welfare systems such as organic pork production system in line with the European Green Deal and *"is committed to promoting this line of business in accordance with consumer demand."*[8]





# Progress in the EU:

## Vision for Agriculture

In 2019, the European Citizens' Initiative 'End the Cage Age' was submitted, having gathered over 1.4 million statements of support. It called on banning the use of cages in farming, resulting in the EU Commission announcing a commitment to put forward a legislative proposal to phase out the use of cages for hens, sows, calves, rabbits, ducks, geese and other farmed animals, and ensure that all imported products in the EU comply with future cage-free standards.[9]

In February 2025, the EU unveiled its Vision for Agriculture and Food where it recommitted to revise existing animal welfare legislation, including its commitment to phase out cages. Additionally, the Commission stated that **future legislative proposals will apply the same standards for products produced in the EU and those imported from third countries**.[10]



## The United States

**The US produces 176x more sow stall-free pork than needed for NZ exports***

**industry wide information for farrowing crate free production is not available*

**12.0%** US sow stall free production

**0.07%** Export volume to NZ

The United States is the second largest pork producing country globally. While sow stalls remain permitted in the US, research estimates that due to state level bans by early 2026 approximately 12% of American pork production will be sow stall-free.[11]

US industry wide data on the use of systems without the use of farrowing crates is unavailable, but several foodservice companies source only cage-free pork, including restaurant chain Chipotle, and a 2024 Compassion in World Farming report mentions several producers who supply fully crate-free pork, indicating producers can adapt based on market demands.[12]

**US pork exports to New Zealand**

The US exports a mere **0.07%** of its total pork production to NZ

NZ represents only **0.34%** of its total pork exports

NZ is its **18th** pork export destination in volume

### Key findings

- The proportion of US production that already meets sow stall free standard **exceeds current export volumes to New Zealand by 176 times**.
- To maintain the current amount exported to New Zealand, the US only needs to **increase sow stall free production by 0.57%.**
- This demonstrates that requiring sow stall free compliance would not create supply constraints for US exporters. While the farrowing crate free supply chain is less clear, exporters are large corporations that have resources to adapt.

Smithfield, the world's largest pork buyer, has **converted some of their own pig farms to be Proposition 12 compliant**, in order to keep access to the California market.[13] The next largest producers Tyson Foods and JBS have made changes in order to produce Proposition 12 compliant pork.[14] In 2022, JBS USA Pork acquired TriOak Foods and stated:

> ***"With a focus on meeting customer and consumer expectations, this announcement means that JBS USA will continue expanding our premium pork product mix, including open pen gestation and Proposition 12-compliant hogs."***
>
> *Marty Dooley, President of JBS USA Pork* [15]






# Case Study: California's Proposition 12 and imports

Several countries and regions around the world have enacted import restrictions due to animal welfare concerns. One notable example is California's Proposition 12.

Proposition 12 is a ballot measure (referendum) that was passed by voters in November 2018. The proposition established minimum space requirements for mother pigs, egg-laying hens, and veal calves, effectively banning the use of sow stalls for pigs and cages for egg-laying hens and **required all products sold in California to comply with these standards - affecting imports.**[16]

California accounts for 13% of pork consumed in the US, and produces less than 1%, meaning the law had a effect on out-of-state producers that sold pork to California.[17]

The standards went into effect over the course of 1 to 5 years and were effectively enforced by a certification system.[18, 19] **Major pork producers like Smithfield, Tyson Foods and JBS have all stated that they have created capacity to produce Proposition 12 compliant pork.**

The law was challenged by the National Pork Producers Council (NPPC) by appealing to the United States Supreme Court claiming that Proposition 12 violated the U.S. Constitution's Commerce Clause. In 2023, the U.S. Supreme Court ruled that Proposition 12 is constitutional and upheld the law.[20]

The legal and political success of Proposition 12 shows that an **import restriction based on public morals is a viable and enforceable policy**.



## Netherlands

**The Netherlands already produces 417x more sow stall-free and 21x more farrowing crate free pork than needed for NZ exports**




Dutch pig welfare standards go beyond those of the EU. Keeping sows in stalls is permitted only for 4 days post insemination, which is similar to New Zealand standards where mating stalls can currently be used for 7 days.[21] However, the use of farrowing crates is still permitted. This situation may soon change - in early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages".*[22]

Compassion in World Farming estimated in 2023 that 5% of sows in the Netherlands are no longer kept in farrowing crates.[23]

Since Netherlands limits the use of stalls to 4 days, which is less than allowed in New Zealand for mating, then all pork produced in the Netherlands should already meet New Zealand's current sow stall free requirement. This is approximately 417x more than needed for NZ exports.

The largest pork producer in the Netherlands, Vion is running pilots of free-farrowing pens. Under the De Groene Weg brand they already produce farrowing crate free pork.[24]

**Netherlands' pork exports to New Zealand**

The Netherlands exports **0.24%** of its total pork production to NZ

NZ represents only **0.29%** of its total pork exports

NZ is its **28th** pork export destination in volume

### Key findings

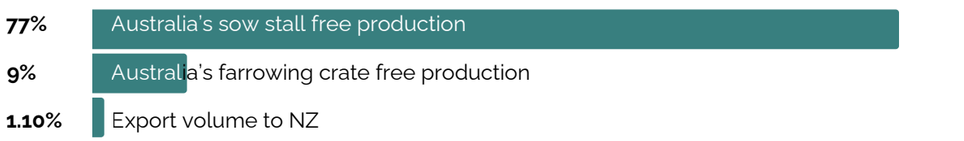
- Netherlands already meets New Zealand's sow stall free standard. The proportion of production that already meets the farrowing crate free standard **exceeds current export volumes to New Zealand by 21 times.**
- To maintain the current amount exported to New Zealand, Netherlands only needs to **increase farrowing crate free production by 4.79%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Netherlands' exporters.





## Australia

**Australia already produces 70x more sow stall-free and 8x more farrowing crate free pork than needed for NZ exports**




Australia is lacking nationwide animal welfare standards, allowing the use of sow stalls and farrowing crates. However, several states have implemented regulations, with Tasmania being the first to legally ban sow stalls in 2013 and Australian Capital Territory following suit in 2014.[25, 26]

The Australian pork industry committed to voluntarily phase out sow stalls by 2017.[27, 28] In 2019 the industry body claimed that "four out of every five Australian sows were loose housed in groups" and the 2021 industry report implied that sow stalls are not used on 77% of pig farms.[29, 30] According to Australian Pork, 5% of Australian sows are kept free range and 4% are outdoor bred, indicating that 9% of sows are already farrowing crate free.[31]

**Australia's pork exports to New Zealand**

Australia exports a mere **1.10%** of its total pork production to NZ

NZ represents **11.98%** of its total pork exports, reflecting Australia's relatively small export market

NZ is its **2nd** pork export destination in volume

### Key findings

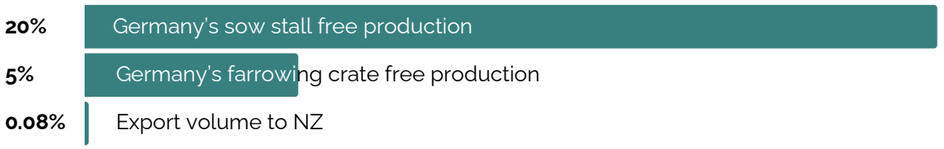
- The proportion of Australia's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 70 and 8 times**, respectively.
- To maintain the current amount exported to New Zealand, Australia only needs to **increase sow stall free production by 1.42% and farrowing crate free production by 12.18%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Australia's exporters.

Rivalea, a brand of JBS Australia, say they have been investigating loose farrowing systems and working with universities who are developing these systems.[32] Sunpork, which produces 20% of Australia's pork, announced in 2015 a plan to eliminate confinement of its sows.[33, 34] In 2024, Sunpork launched the 'maternity ring' that claims to eliminate sow confinement while protecting the piglets and have made farrowing crate free products available in Australia through Woolworths.[35, 36]

> ***"The gestation stall phase out initiative was our industry's response to meet the growing desires among consumers for higher welfare food, balanced with ensuring the long term sustainability of the industry by managing the transition in a balanced/cost controlled way."***
>
> *Andrew Spencer, Australian Pork Limited CEO, 2014* [37]

## Germany

**Germany already produces 251x more sow stall-free and 63x more farrowing crate free pork than needed for NZ exports**




Germany still currently allows the use of sow stalls for the first four weeks after insemination, in line with EU Directive 2008/120/EC. The use of farrowing crates is also allowed. In 2020 Germany passed a law banning the use of sow stalls from 2029 and limiting the use of farrowing crates to 5 days from 2036.[38]

Compassion in World Farming estimated in 2023 that 20% of sows in Germany are no longer kept in sow stalls and 5% no longer in farrowing crates.[39]

**Germany's pork exports to New Zealand**

Germany exports a mere **0.08%** of its total pork production to NZ

NZ represents only **0.22%** of its total pork exports

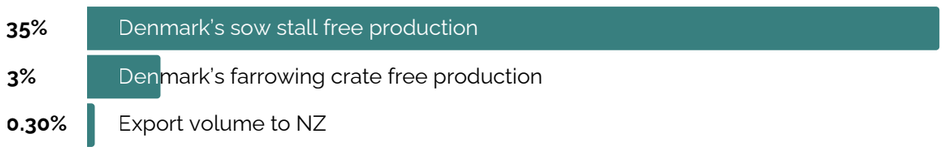
NZ is its **32nd** pork export destination in volume

### Key findings

- The proportion of Germany's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 251 and 63 times**, respectively.
- To maintain the current amount exported to New Zealand, Germany only needs to **increase sow stall free production by 0.4% and farrowing crate free production by 1.59%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Germany's exporters.

## Denmark

**Denmark already produces 117x more sow stall-free and 10x more farrowing crate free pork than needed for NZ exports**




Denmark still currently allows the use of sow stalls for the first four weeks after insemination, in line with EU Directive 2008/120/EC. The use of farrowing crates is also allowed.

However, the Danish pork industry claims to have gone beyond the EU Directive requirements. Any new pig units built in Denmark since 2015 may only use sow stalls for up to 3 days and this must apply to all existing units by 2035.[40, 41] In 2024, 31 welfare initiatives were agreed by Denmark's governing parties.



The "Together for the Animals" agreement established 7 initiatives, which among other things included phasing out farrowing crates for pigs.[42] In early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages"*.[43]

Compassion in World Farming estimated in 2023 that 35% of sows in Denmark are no longer kept in sow stalls and 3% no longer in farrowing crates.[44]

**Denmark's pork exports to New Zealand**

Denmark exports a mere **0.30%** of its total pork production to NZ

NZ represents **0.39%** of its total pork exports

NZ is its **26th** pork export destination in volume

### Key findings

- The proportion of Denmark's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 117 and 10 times,** respectively.
- To maintain the current amount exported to New Zealand, Denmark only **needs to increase sow stall free production by 0.85% and farrowing crate production by 9.93%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Denmark's exporters.

Danish Crown, by far Denmark's largest pork processor and major exporter of pork, has been working under the industry-wide voluntary commitment to loose housing systems. In 2022, the Danish sector for the production of pigs and pig meat presented a joint vision for the sector that included a clear recommendation that loose-housing is the future for Danish sows.[45, 46] Danish Crown has been participating in research into different free farrowing systems, in collaboration with Danish academics.

> ***"Danish Crown continues to support and participate in research projects that will facilitate an effective transition to free-farrowing systems in years to come."***
>
> *Danish Crown, 2020* [47]

**To export to the UK, Danish producers appear to be meeting UK standards**

In 1997 the Contract for Production of UK Pigs was developed whereby Danish producers wanting to export to the UK, must follow UK pig welfare standards.[48] For example, the UK banned sow stalls in 1999.[49, 50] In 2024, production under the Danish UK Contract represented 31% of Danish Crown's production in Denmark.[51]

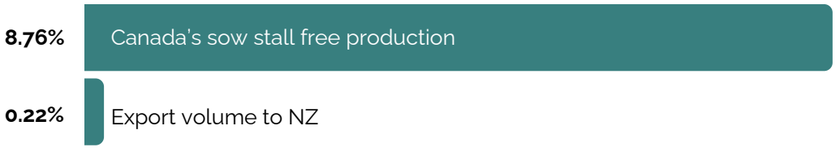
Given the apparent long-term goals of the Danish pork industry and the fact that a significant share of farmers are already complying with UK pig welfare standards, it seems that meeting New Zealand pig welfare standards would be straight forward for the Danish industry.



# Canada

**Canada already produces at least 39x more sow stall-free pork than needed for NZ exports***

**industry wide information for farrowing crate free production is not available*




Canada has no specific laws for the welfare of pigs. Voluntary industry standards are created by the National Farmed Animal Care Council (NFACC) which allow the use of sow stalls and farrowing crates.

The industry has committed to transition to "group housing" by 2029 with the NFACC claiming in 2023 that 62% of the industry has already done so.[52] However, the "group housing" is still using sow stalls for up to 35 days of pregnancy and has no limits on the use of farrowing crates.

**Canada's pork exports to New Zealand**

Canada exports a mere **0.22%** of its total pork production to NZ

Canada exports over half of its total pork production, with just **0.43%** going to NZ

NZ is its **11th** pork export destination in volume

## Key findings

- The proportion of Canada's production that already meets sow stall free standard **exceeds current export volumes to New Zealand by at least 39 times**.
- To maintain the current amount exported to New Zealand, Canada only needs to **increase sow stall free production by 2.55%**.
- This demonstrates that requiring welfare compliance would not create supply constraints for Canada's exporters. While the farrowing crate free supply chain is less clear, exporters are large corporations that have resources to adapt.

One of the largest producers and exporters in Canada, **Maple Leaf Foods**, sourced 45% of their total global pork supply in 2024 from sows free of gestation stalls *"after confirmation of pregnancy"*.[53] In their own production, 69,850 sow spaces have been converted to be sow stall free.[54, 55, 56] This translates to around 8.76% of Canada's pork production. There is limited information regarding other producers, but based on Maple Leaf Foods, Canada's sow stall free production is at least 8.76% of production. While there is almost no public information about the use of farrowing crate free systems in Canada, Maple Leaf Foods stated in their 2024 report that they are *"Currently pilot testing free farrowing systems"*.[57]

> ***Our progress in eliminating gestation crates in our sow barns across Canada is a significant milestone as we proudly lead the industry towards a more compassionate approach to animal welfare.*** *Michael McCain, Maple Leaf Foods CEO, 2021* [58]

Olymel L.P. has made several announcements regarding pig welfare. In 2013 they committed to phasing out sow stalls by 2022. In their recent corporate sustainability report they have recommitted, albeit extending the transition period until 2029.[59]



# Finland

**Finland already produces 22x more sow stall-free and 10x more farrowing crate free pork than needed for NZ exports**




Finland still currently allows the use of sow stalls for the first four weeks after insemination, in line with EU Directive 2008/120/EC and the use of farrowing crates. Finland's Animal Welfare Act, which was passed in 2023, limits the use of stalls to 8 days post insemination from 2035 and **bans construction of new farrowing crates.**[60, 61] In early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages"*.[62]

**Finland's pork exports to New Zealand**

Finland exports **1.94%** of its total pork production to NZ

NZ represents **11.24%** of its total pork exports, reflecting Finland's relatively small export market

NZ is its **4th** pork export destination in volume

Compassion in World Farming estimated in 2023 that 42% of sows in Finland are no longer kept in sow stalls and 20% no longer in farrowing crates.[63]

## Key findings

- The proportion of Finland's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 22 and 10 times**, respectively.
- To maintain the current amount exported to New Zealand, Finland only needs to **increase sow stall free production by 4.62% and farrowing crate free production by 9.71%**.
- Together with Finland's commitment to further limit the use of sow stalls and farrowing crates, this demonstrates that requiring welfare compliance would not create supply constraints for Finland's exporters.

Atria, the largest pork processor in Finland, committed to transitioning to a free farrowing system in 2019, stating:

> ***The transition from traditional to free farrowing will be strongly increased in Atria's pork chain during the upcoming years. The change is made possible by technological development, the development of entrepreneurs' skills, and first and foremost the will to meet the message from the consumers.*** *Atria, 2019* [64]

HKScan, the second largest pork processor in Finland, says 40% of their sows in Finland are farrowing in a free-farrowing pen and they are using free farrowing in all of their Swedish operations due to the requirements in national legislation.[65, 66] The third largest producer in Finland, Snellman, is actively incentivising their farmers to transition to a free farrowing system with a goal of transitioning to a 100% free-range farrowing.[67, 68]

## Poland

**Poland already produces 570x more sow stall-free and 491x more farrowing crate free pork than needed for NZ exports**

**65%** Poland's sow stall free production

**56%** Poland's farrowing crate free production

**0.11%** Export volume to NZ

Poland still currently allows the use of sow stalls for the first four weeks after insemination, in line with EU Directive 2008/120/EC. The use of farrowing crates is also allowed. This situation may soon change - in early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages"*.[69]

Compassion in World Farming estimated in 2023 that 65% of sows in Poland are no longer kept in sow stalls and 56% no longer in farrowing crates.[70]

**Poland's pork exports to New Zealand**

Poland exports a mere **0.11%** of its total pork production to NZ

NZ represents only **0.49%** of its total pork exports

29th

NZ ranks as its **29th** pork export destination in volume

## Key findings

- The proportion of Poland's production that already meets sow stall and farrowing crate free standards **exceeds current export volumes to New Zealand by 570 and 491 times**, respectively.
- To maintain the current amount exported to New Zealand, Poland only needs to **increase sow stall free production by 0.18% and farrowing crate free production by 0.20%**.
- This demonstrates that requiring welfare compliance would not create supply constraints for Poland's exporters.

Some of the largest pork producers in Poland, Animex Foods and Sokołów S.A., are owned by Smithfield Foods and Danish Crown, respectively. While Smithfield has made commitments to eliminate gestation crates in their US operations, and Danish Crown is moving towards loose housing systems in Denmark, similar specific commitments haven't been made for their Polish operations.



Sow in a sow stall in Poland (2022)
© Farm Transparency Project: human.cruelties



> *Over 80% of liquid egg imports comes from countries that allow caged hens. They're banned here. What that means is that local producers are hugely disadvantaged because animal welfare has a cost, which is why I support imposing NZ welfare standards on imported animal products.*

**Alan Emerson**, Retired farmer and businessman

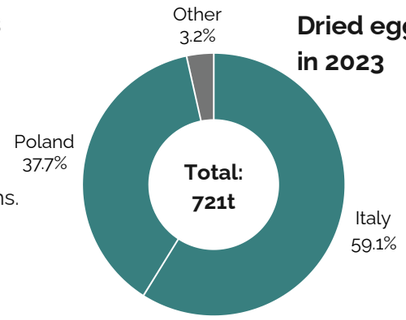


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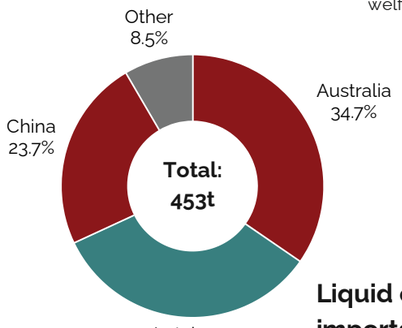
# Applying Welfare Standards to Imports: Egg-Laying Hens

In 2023, 721 tonnes of dried eggs and 453 tonnes of liquid eggs were imported into New Zealand. This equates to approximately 212,000 hens.[71]

Currently, New Zealand doesn't import fresh eggs for food for biosecurity reasons.




**Dried egg imports in 2023**

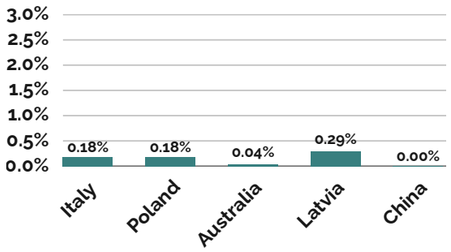


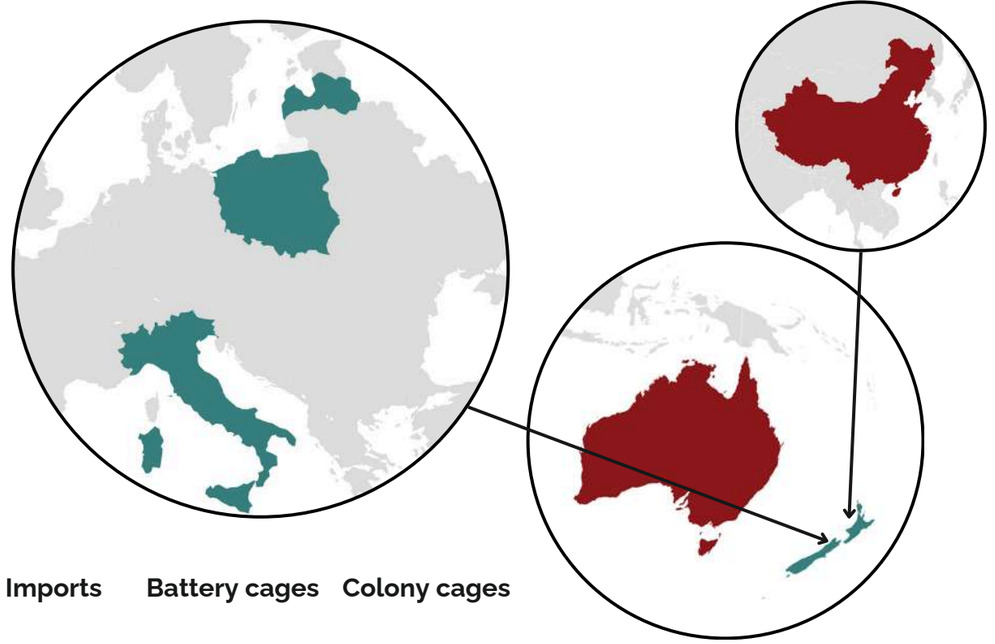

**Liquid egg imports in 2023**

similar level of animal welfare legislation

lower level of animal welfare legislation

**New Zealand accounts for less than 0.30% of exporters' total egg production**



| Country | Imports | Battery cages | Colony cages |
|---|---|---|---|
| **DRIED EGGS** | | | |
| Italy | 425.9 t (59.1%) | Banned | Permitted |
| Poland | 272.2 t (37.7%) | Banned | Permitted |
| **LIQUID EGGS** | | | |
| Australia | 157.5 t (34.7%) | Permitted, banned from 2036 | Permitted |
| Latvia | 150.0 t (33.1%) | Banned | Permitted |
| China | 107.3 t (23.7%) | Permitted | Permitted |
| New Zealand | - | Banned | Permitted |

To access the full data behind this report, **scan the QR code** or go to **animalpolicyinternational.org/NZ-data**

## Layer hen welfare in New Zealand and internationally

The use of battery cages and colony (enriched) cages are regarded as the primary welfare issues for layer hens.

### Battery cages and colony (enriched) cages

Battery cages (conventional cages) are small barren wire cages where egg-laying hens spend most of their lives.[72] There are usually several birds in each cage with an average of 440 cm2 of space per bird - less than an A4 sheet of paper.[73]

In 2012, the Government banned standard battery cages, but kept the use of colony cages. The ban came into force in 2023.



Colony cages have slightly more space than an A4 sheet of paper per bird, and still come with significant welfare issues. Cages are stacked on top of each other inside a shed, which houses tens of thousands of hens. Hens cannot properly perform natural behaviours such as foraging, dust bathing, and nesting, negatively affecting their welfare. Colony cages are being phased out in 20 countries globally.

A hen in a cage at a factory farm in Australia (2013) © Jo-Anne McArthur: We Animals Media



### Cage-free movement

There is a significant movement towards cage-free egg production globally. Several European countries have **gone beyond the EU battery cage ban** and committed to or already banned the use of colony cages. These include the Wallonia and Flanders regions in Belgium, Austria, Czechia, Germany, Luxembourg, Netherlands, and Slovenia.[74, 75] According to Compassion in World Farming 2023 figures, 57.4% of egg-laying hens in the EU were raised cage-free.[76]

In the US, **eleven states have banned the use of cages for hens** and eight of them also apply the requirement to products sold in their states.[77] As of July 2025, 46.5% of the US egg-laying flock was cage-free.[78] In the EU's 2025 Vision for Agriculture it recommitted to revise existing animal welfare legislation, including its commitment to phase out cages and apply to imports.[79]

Retailers in New Zealand have pledged not to stock any cage eggs, including those from colony systems. Woolworths aims to finish the transition by the end of 2025, while New World and Pak'nSave have set a target of 2027.[80, 81] **In 2022, 34% of layer hens in New Zealand were kept cage-free.**[82]

If New Zealand went further and also banned the use of colony cages and applied it to imports, it is very likely that producers overseas would be able to provide cage-free egg products for the New Zealand market.

Vision Into Action



An egg-laying hen in a battery cage in India (2023) © Shatabdi Chakrabarti / FIAPO / We Animals Media

# Egg Exporters Can Comply

## Australia

**Australia already produces 1,026x more cage-free eggs than needed for NZ exports.**

**45%** Australia's cage-free production

**0.04%** Export volume to NZ

In 2022, Australia set a 14 year phase out period for battery cages by 2036.[83] Two states have already introduced bans on battery cages: Tasmania banned the creation of any new battery hen operators from 2013, and Australian Capital Territory banned the practice altogether in 2014.[84, 85]

### Key findings

- The proportion of Australia's production that would meet battery and colony cage-free standards **exceeds current export volumes to New Zealand by 1,026 times.**
- To maintain the current amount exported to New Zealand, Australia only needs to **increase (battery) cage-free production by 0.10%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Australia's exporters.

**Australia's egg exports to New Zealand**

Australia exports a mere **0.04%** of its total egg production to NZ

NZ represents **7.21%** of its total egg exports

NZ is its **4th** egg export destination in volume

It is estimated that **45% of Australian egg production is cage-free**.[86] During the financial year of 2023-24, 19.7% of eggs sold in Australian supermarkets were caged and 57.4% came from free range systems.[87] Since there is no differentiation between "battery cage" and "enriched (colony) cage" systems in the statistics, then the estimates for compliance with New Zealand current battery cage ban and potential colony cage ban are the same.



Hen in a cage at a factory farm in Australia (2013)
© Jo-Anne McArthur: We Animals Media



## China

**China already produces at least 10,434x more cage-free eggs than needed for NZ exports.**

**3.00%** China's cage-free production

**0.0003%** Export volume to NZ

China is the biggest egg producer in the world, accounting for around 40% of global production.[88] The International Egg Commission (now called the World Egg Organisation) estimated in its 2019 annual review that 3% of Chinese egg production is cage-free.[89] Another source estimates that 10% of Chinese egg production is cage-free, 9% of it coming from forest or family-raised free-range, and 1% from indoor cage-free systems. 90% of eggs are estimated to be produced using battery cages.[90]

### Key findings

- The proportion of China's production that would meet battery and colony cage-free standards **exceeds current export volumes to New Zealand by 10,434 times.**
- To maintain the current amount exported to New Zealand, China only needs to **increase (battery) cage-free production by 0.01%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for China's exporters.

**China's egg exports to New Zealand**

China exports a mere **0.0003%** of its total egg production to NZ

NZ represents only **0.06%** of its total egg exports

NZ is its **11th** egg export destination in volume

## Sundaily is building China's largest cage-free egg farm

Sundaily, China's second-largest egg producer, began the construction of the nation's largest cage-free egg farm. Initial capacity is planned for 300,00 hens with plans to scale to 1,000,000 over several years.[91] **The initial capacity will be 37 times higher than what is required for New Zealand exports and later capacity 124 times higher.** Additionally, the facility will have processing capabilities to produce shell eggs, liquid eggs, powdered eggs and other processed egg products.

There are many other companies that already have significant cage-free operations in China, like Pianguan Yongao, which has a capacity of 200,000 hens.[92] Over 2000 brands globally have pledged to go 100% cage-free and 150 of them operate in China.[93]



Hen in cages in China (2018)
© Kelly Guerin / We Animals

**A note on EU countries exporting to NZ: Italy, Poland and Latvia**

All of the EU suppliers meet current New Zealand standards since both regions have phased out battery cages. The EU banned the use of battery cages in 2012, but enriched (colony) cages are still allowed.[94] This situation may soon change - in early 2025, the EU released its Vision for Agriculture and Food in which the Commission reiterated its *"commitment to phase out cages"*.[95]

The following analysis of the three EU countries looks at their capacity to provide cage-free eggs, if New Zealand were to phase out all cages in egg farming and apply the standards to imports.

## Italy

**Italy's standards already meet the current New Zealand battery cage-free standard. Italy produces 351x more cage-free eggs than needed for NZ exports, if NZ banned colony cages.**

**64.4%** Italy's cage-free production

**0.18%** Export volume to NZ

Compassion in World Farming estimated in 2023 that 64.4% of hens in Italy are no longer kept in cages.[96]

### Key findings

- The proportion of Italy's production that would meet colony cage-free standards **exceeds current export volumes to New Zealand by 351 times**.
- To meet the potential cage-free demand and maintain the current amount exported to New Zealand, Italy only needs to **increase cage-free production by 0.28%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Italy's exporters.

**Italy's egg exports to New Zealand**

Italy exports a mere **0.18%** of its total egg production to NZ

NZ represents only **2.15%** of its total egg exports

NZ is its **22nd** egg export destination in volume



Egg-laying hen in Italy (2015)
© Stefano Belacchi / Essere Animali / We Animals



## Poland

**Poland's standards already meet the current New Zealand battery cage-free standard. Poland produces 186x more cage-free eggs than needed for NZ exports, if NZ banned colony cages.**

**34.2%** Poland's cage-free production

**0.18%** Export volume to NZ

According to Poland's Chief Veterinary Inspectorate 34.2% of hens in Poland are no longer kept in cages, based on available housing capacity.[97]

### Key findings

- The proportion of Poland's production that would meet colony cage-free standards **exceeds current export volumes to New Zealand by 186 times.**
- To meet the potential cage-free demand and maintain the current amount exported to New Zealand, Poland only needs to **increase cage-free production by 0.54%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Poland's exporters.

**Poland's egg exports to New Zealand**

Italy exports a mere **0.18%** of its total egg production to NZ

NZ represents only **0.37%** of its total egg exports

NZ is its **27th** egg export destination in volume

## Latvia

**Latvia's standards already meet the current New Zealand battery cage-free standard. Latvia produces 103x more cage-free eggs than needed for NZ exports, if NZ banned colony cages.**

**64.4%** Latvia's cage-free production

**0.18%** Export volume to NZ

Compassion in World Farming estimated in 2023 that 30.3% of hens in Latvia are no longer kept in cages.[98]

### Key findings

- The proportion of Latvia's production that would meet colony cage-free standards **exceeds current export volumes to New Zealand by 103 times.**
- To meet the potential cage-free demand and maintain the current amount exported to New Zealand, Latvia only needs to **increase cage-free production by 0.97%.**
- This demonstrates that requiring welfare compliance would not create supply constraints for Latvia's exporters.

**Italy's egg exports to New Zealand**

Italy exports a mere **0.18%** of its total egg production to NZ

NZ represents only **2.15%** of its total egg exports

NZ is its **22nd** egg export destination in volume

# Retaliation Risk is Low

The supply chain overview shows that New Zealand holds a minor market share among major exporters. Most of its current trade partners are already equipped to comply with an import policy requiring all pork and eggs sold in New Zealand to meet proposed standards. However, some stakeholders have expressed concerns about potential retaliatory measures.

This analysis examines the likelihood and implications of retaliatory welfare requirements and tariffs. These risks are generally low and often overstated. The proposed import policy carries minimal risk of provoking retaliation. The reasonable standards, the global trend toward improved animal welfare, and the significant trade complications for potential retaliatory countries indicate that most trading partners would see this policy as a logical step, not a provocative one.

## Retaliatory welfare requirements

### Legal criteria

As established in legal advice on this issue (*The Legality of Closing the Welfare Gap, August 2024*) for a country to place welfare requirements on imports they need to meet two key criteria.[99]

1. First, they would have to **demonstrate a public morals case** for the requirement, established through domestic legislation and public opinion.
2. Second, they would have to apply such standards to **all domestic and imported products**.

In New Zealand, there is **a strong public morals case** for banning imports from battery cages and sow stalls, driven by significant, provable, public outcry.

Some stakeholders suggest potential retaliation may focus on poor New Zealand practices, particularly in regards to lack of shelter or "winter grazing" in the major New Zealand exporting industries, dairy and beef. Whilst these practices undeniably require urgent resolution for the sake of welfare, they do not provide a credible basis for international trade retaliation, with any potential retaliatory welfare requirements facing significant legal and practical barriers.

***Retaliation risk is minimal because most trading partners either can't legally retaliate or would impact their other trade relationships far more significantly than New Zealand's***

### Intensive winter grazing and shelter access

Intensive winter grazing refers to a practice where animals are grazed on crops in paddocks during winter months. One of the main welfare concerns is that the ground can quickly get muddy during wet periods and leave animals without any clean and dry areas to live in and lie down.[100]

Additionally, while providing appropriate shade and shelter to farmed animals is a requirement in New Zealand, enforcement has been lacking, leaving animals exposed to extreme weather events, causing both heat and cold stress. Both practices violate the Animal Welfare Act 1999 because they do not meet the physical, health, and behavioural needs of animals.[101, 102]



### Potential retaliatory countries: limitations and challenges

Primary exporters of pork and egg products to New Zealand, the US, Canada, Australia; and EU countries such as Spain, Germany, Denmark, Poland; and China would all face substantial obstacles in trying to implement retaliatory welfare requirements.

#### Canada, the US, Australia and China

Canada, the US, Australia and China currently lack higher domestic standards that could be applied to imported products.

Even still, if Canada, for example, changed these practices, instated laws against winter grazing and applied these to imports they would also have to require uniform application from other trade partners in addition to New Zealand.

In Canada's case, such measures for beef, dairy, and sheep meat would also need to apply to the US, Australia, Uruguay, Mexico, and Brazil. This would impact 50-86% of Canada's own import markets for these products.[103]

**So any attempted retaliation on these grounds would have a much greater effect on Canada's other trading partners than on New Zealand.** Similar challenges would confront Australia, the United States and China, where implementing new standards would create significant disruptions to existing trade relationships.

#### European Union

While EU countries may theoretically have the greatest likelihood of retaliatory action due to some higher standards for shelter, potential retaliation action would require EU-level consensus. Most EU members will be unaffected by the policy as they either (1) don't export pork to New Zealand or (2) are phasing out the use of sow stalls and farrowing crates.

**In fact, producers in EU countries who are phasing out sow stalls (like Germany and Sweden) are likely to benefit from the policy, as they will also be competing on a level playing field** with pork exporters in Spain and Poland who otherwise would not have to follow higher standards when exporting to New Zealand.

***The policy would also level the playing field for higher welfare EU exporters, like Germany and Sweden***

Consequently, any attempts at retaliatory action at the EU level is likely to encounter opposition. With countries like the Netherlands, Germany, Denmark, and Finland likely to oppose retaliatory measures, effectively neutralising potential punitive actions.

#### The EU plans to require imports to meet their animal welfare standards

Notably, the European Commission is independently considering implementing similar domestic welfare requirements for animal products, suggesting alignment with rather than opposition to New Zealand's approach.




## Retaliatory tariffs: economic and legal considerations

While it is unlikely that trade partners would choose to retaliate with tariffs due to the small impact on their producers and their capacity to comply with New Zealand standards as outlined in this report, the impact of tariffs is still explored in this section.

### Legal framework

For tariffs to comply with international law, they must not exceed specific maximum rates and must commit to the Most-Favoured Nation (MFN) principle. This requires equal treatment for all WTO trading partners unless a recognised exception applies such as national security or responses to unfair trade practices like dumping or subsidisation.[104, 105]

### Tariffs can be harmful for domestic economy

The potential short-term political statement of imposing tariffs would be far outweighed by the significant economic damage to the retaliating country.

Tariffs can lead to declines in domestic output, productivity, more unemployment, higher inequality, and real exchange rate appreciation.[106] For instance, models of the recent US tariffs, by American think tank The Tax Foundation, show that they will reduce US GDP by 0.9% and hours worked by 831,000 FTE.[107] Similar models from Professor Winchester (Auckland University of Technology) show a 0.49% decrease in GDP for the US.[108]

***Over 80% of New Zealanders agree that imported products from outside New Zealand should respect the same animal welfare standards as those applied in New Zealand.***

**Horizon Research, 2024** [109]



> *The welfare gap is growing. Farmers are not able to compete on a level playing field. Farmers and consumers deserve better and so do our livestock.*

**Walt Cavendish**, Dairy Farmer, Waikato





## Comparable policies show no retaliatory response

Several international measures targeting specific situations, practices, or species have neither faced challenges through the WTO dispute settlement process nor triggered retaliation from trade partners. For example:

- **EU Slaughter Regulation** requires equivalent standard for slaughter procedures, stunning, and qualification of the personnel to be met from imported meat products[110]
- **California's Proposition 12** is a California state law that was passed in 2018 to protect cows, pigs and chickens by banning some types of confinement and is also applied to imported products[111]
- **EU Cosmetics Regulation** banning marketing of cosmetics containing ingredients tested on animals[112]
- **Bans on the importation of foie gras**, including California[113] and India[114]
- **Bans on the importation of fur products**, including Switzerland[115], India[116], Israel[117], Taiwan[118]

Historical precedent confirms minimal retaliation risk. Analysis of these comparable import policies reveals no evidence of trade retaliation.

Additionally, export data indicates that countries implementing these policies did not experience a decline in trade volumes with their most affected trading partners (data over the page). Export value growth trends remained consistent with global averages, both before and after these policies were enacted. This suggests that import restrictions based on ethical considerations do not lead to retaliatory trade measures.

***Analysis of historical import bans found no evidence of trade retaliation, with export volumes and growth trends to affected countries remaining unchanged.***

### Methodology

The analysis used a difference-in-differences methodology, comparing total export value from countries implementing import restrictions to their most affected trading partners before and after policy implementation. The total trade value with unaffected countries is used as a control. This approach controls for external economic factors and isolates the specific impact of events that occurred in the year of implementation, such as these import policies. This provides clear evidence of whether export trade value was affected and if any retaliation occurred.

To access the full data behind this report, **scan the QR code** or go to **animalpolicyinternational.org/NZ-data**



| Import requirement | Main trading partners affected | Change in export value to main trading partners after enforcement | Approximate impact of the import requirement on export volumes to main trading partners | Statistical significance |
|---|---|---|---|---|
| **EU Slaughter Regulation (2013)** | Brazil, Thailand | +15.23% (2013-2024) | **-0.06%** | P=0.81, insignificant |
| **EU Cosmetics Regulation (2013)** | US, China, Japan, Rep. of Korea | +32.98% (2013-2024) | **+0.10%** | P=0.79, insignificant |
| **India foie gras import ban (2014)** | France, Spain | +51.76% (2014-2024) | **-0.13%** | P=0.73, insignificant |
| **California foie gras import ban (2012)** | Canada, France | +21.05% (2012-2024) | **-0.18%** | P=0.65, insignificant |
| **India fur import ban (2017)** | China, Canada, US | +61.79% (2017-2024) | **+0.27%** | P=0.72, insignificant |

## Interpreting the data

The table above presents the findings of difference-in-difference analysis. The fourth column estimates the impact of the import requirement on export flows to main affected countries.
For context, the third column provides information on the general change in trade volumes to affected countries. It should be noted that all impacts were found to be statistically insignificant, meaning that **no effect of import requirements on export flows were found**. Examples of how to read the table:

- **EU Slaughter Regulation:** After implementation, the EU export value to Brazil and Thailand grew approximately 0.06% less than expected compared to the trend of EU exports to the rest of the world, resulting in export increase in 15.23%, instead of 15.29%, However P value of 0.81 indicates the difference to be insignificant, meaning that the import measure had no impact on trade volumes.
- **India fur import ban:** After implementation, India's export value to China, Canada, and the US grew approximately 0.27% more than expected compared to the trend of India's exports to the rest of the world, resulting in export increase in 61.79%, instead of 61.52%, However P value of 0.72 indicates the difference to be insignificant, meaning that the import measure had no impact on trade volumes.

Country-by-country analysis found a few statistically significant but minor changes. Following the EU Cosmetics Regulation, EU exports to China were estimated to have increased by 0.57% due to the measure and decreased by 0.27% to Japan. However, it is likely that it coincided with other events that affected trade, like the Belt and Road Initiative in China's case in 2013 and Japans broader decline in import value. More detailed data can be seen in the data sheet accompanying the report.

The above sections demonstrate that trade disruption and retaliation risks are low, but how would the policy affect Kiwis? The next section explores price impacts of requiring imports to meet New Zealand animal welfare standards.

# Levelling the Playing Field for Kiwi Farmers

Following market-oriented reforms in the 1980s, the government chose to 'eliminate all state distortions' and 'fully expose the agricultural sector to market forces'. This decision marked a fundamental transition from a heavily regulated system to one where subsidies, tax concessions, and price supports were almost entirely removed.[119]

The result is a highly competitive sector that is the largest in New Zealand's tradable economy. **However, the competitive landscape is compromised by a fundamental uneven playing field between Kiwi farmers and imported products.**

## The competitive imbalance

The current system creates a stark dichotomy:

- **Domestic Producers:** Legally bound to meet local standards
- **Overseas Producers:** Exempt from New Zealand's animal welfare regulations

**This double standard directly places local farmers at a disadvantage.** They must invest in production methods while competing with imports that may have been produced using practices banned within New Zealand.

The current system effectively penalises local farmers, undermining the very principles of fair competition and animal welfare that the country seeks to uphold. By implementing import standards that align with domestic production requirements, New Zealand can create a more equitable environment. This approach would not only protect local farmers but also ensure that all products sold in the market meet the same fundamental animal welfare standards, reflecting the country's ethical and economic values.

## Import policy can incentivise increase in domestic pork production

The total output for pork in NZ was $206 million NZD in 2023[120] while the value of imported pork was $277.06 million NZD ($161.8 USD)[121] so there is potential for growth in the domestic market and industry.

### Understanding market dynamics: Armington elasticity

Armington elasticity, an economic parameter commonly used in models of consumer theory and international trade, measures how consumers respond to increases in the price of domestic and imported products.

- **High Elasticity:** Consumers easily switch between domestic and imported goods
- **Low Elasticity:** Strong preference for goods from a specific origin

Most good estimates lie in the range 2.5–5.1 with a median of 3.8.[122] For pork and broader meat products estimates vary across models and timeframes from 1.019 and 2.083[123] to as high as 14.8[124] in some instances. Historic estimates used for modelling by the New Zealand Department of Prime Minister and Cabinet estimate this is 2.5 or 4.0 for "meat and other food processing".[125]



Using Armington elasticity values of 2.5 and 4.0 from the New Zealand Department of Prime Minister and Cabinet, market share of imports of 62% and estimated price increase of 7.7% for non-compliant pork, **the market share of New Zealand's domestic pork production could increase 3.18%-5.36%, a growth of 8.4%-14.1% in the size of the industry, increasing output by $17.2 million NZD to $29.0 million NZD.**

***The policy could increase NZ pork industry output by $17.2 to $29.0 million***

## Aligning imports with domestic values is beneficial for New Zealand's reputation

Beyond quantifiable benefits of an even playing field, the policy offers strategic advantages:

- The reinforcement of New Zealand's reputation as a **world leader in higher welfare,** aligning with the Ministry for Primary Industries (MPI) recognition that New Zealand's reputation for higher animal welfare has **"helped secure access to markets internationally"**.[126]
- Prepares the sector for a future where global consumer preferences are increasingly driven by concerns for sustainability and animal welfare.
- Transforms the nation's higher standards from a cost burden into a **competitive advantage.**



> *"By requiring NZ farmers to hold higher levels of standards, whilst not applying the same rules to our importing trade partners, animal health and welfare standards are not improved, rather there is transfer of the lesser welfare conditions off-shore and disadvantaging the NZ farmer and NZ economy."*
>
> **Thomas Nabbs**, Director Rawhiti Environmental Park Ltd

# Price Implications of Import Animal Welfare Standards

Understanding price implications of requiring imported animal products to meet New Zealand's welfare standards is crucial.

Given the minimal import volumes for egg products, requiring them to meet New Zealand animal welfare standards would unlikely have any noticeable effects on prices and therefore are not included in this analysis. Therefore, the following explores the price impact of requiring imported pork to meet New Zealand animal welfare standards.

**Minimal price impact: $0.25 per week**

## Pork price impact analysis: scenarios

To estimate the potential consumer cost associated with only importing pork from sow stall free systems, three studies were considered:

1. **US 2011 estimate:** A 2011 US study estimated moving from sow stalls to group housing to be just 3 to 4 cents per pound of finished pig, translating to a price increase of 6.7% to 8.9%.[127]
2. **MAFBNZ estimate:** The New Zealand National Animal Welfare Advisory Committee (NAWAC) analysed the economic effects of phasing out sow stalls in accordance with the draft Animal Welfare (Pigs) Code of Welfare 2010.[128] They reported on an analysis by the Ministry of Agriculture and Forestry Biosecurity New Zealand (MAFBNZ), estimating that the impact on the pig meat market of banning sow stalls would be a 4.5% price increase. However, NAWAC estimated that the productivity loss would be limited, resulting in a lower price increase.
3. **Proposition 12 (California) estimate:** The cost impact on pork of Proposition 12, was estimated at around 7.7%.[129] Subsequent analysis of price impacts in the first few months following implementation of the law revealed consumer price increases ranging from 9% to 41% and an average of 20%.[130] However, it is likely that the initial sharp rise was likely due to supply shocks and will settle over time.[131]

To access the full data behind this report, **scan the QR code** or go to **animalpolicyinternational.org/NZ-data**




## A note on California's Proposition 12 and New Zealand

In California almost all pork is imported, which initially created supply challenges. However, in New Zealand around 40% is produced domestically and as outlined, exporters to New Zealand have capacity to comply with New Zealand standards, which significantly reduces the chance of supply shocks and price spikes on the New Zealand market.

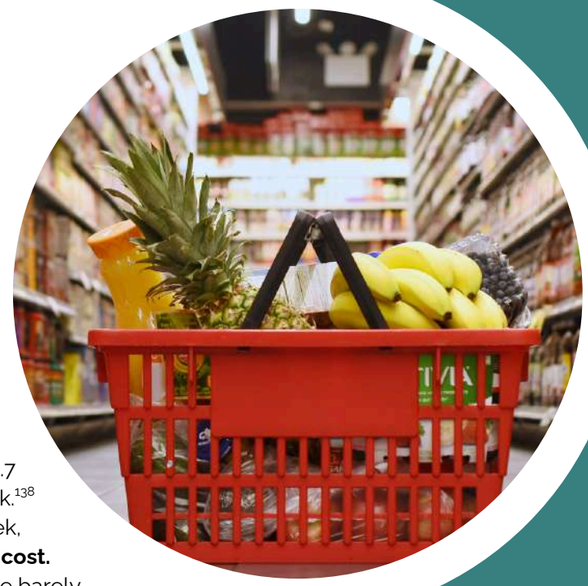


To estimate the potential cost to consumer associated with transitioning imported pork to farrowing crate free systems, three studies were considered:

1. **EU 2024 Study:** A study assessing the impacts of the phasing out farrowing crates in EU pig farming estimated additional cost per pig to be around 5.54 Euros, which translates to 2.64% increase in production costs.[132]
2. **UK 2020 Analysis:** The Agriculture and Horticulture Development Board (AHDB) in the UK found that cost increase related to farrowing crate elimination was just 3 to 5 pence per kg deadweight pig, translating to 2.01% to 3.35% increase in production cost.[133]
3. **EU 2023 Study:** Another socio-economic study estimating implications of banning farrowing crates in EU pig farming estimated production cost increase at 11% and retail price increase at 3.2%.[134]

All scenarios used NZ Pork 2024 data as the basis:

- 19.91 kg of pork is consumed in NZ per capita, of which 12.32 kg is imported.[135]
- Based on FAO trade data and assuming trade partners' sow stall free production share to be the same for imports, 64.72% of imports were estimated to come from sow stall systems and 88.69% from farrowing crate systems.[136]



## Estimated Cost to Consumer

The analysis estimates **additional cost to a consumer to be $13.37 per year (range: $3.61 - $33.97), which translates to just $0.25 per week (range: $0.07 - $0.66).**

An average household in New Zealand consists of 2.7 people[137] and spends around $300 on food per week.[138] Therefore, this would translate to just $0.66 per week, **representing 0.22% of the weekly household food cost.** The potential cost increase from this policy would be barely noticeable when compared to the current meat price inflation, which already exceeds 5%.[139]

***It would only costs $0.25 per week to ensure imports align with our values.***

## New Zealanders are willing to pay as much as 19% more for higher animal welfare

A 2023 survey of New Zealand consumer attitudes to consumption of meat and meat alternatives found that consumers indicated **willingness to pay 19% more above the price they normally pay for higher animal welfare** - significantly higher than the modelled impact of this policy.[140]

This change would better reflect the cost of production under higher standards.

- **Minimal price impact:** Negligible increase in consumer costs
- **Transparency:** removes hidden cost of unethical consumption
- **Consumer Alignment:** Kiwis are willing to pay premium for higher welfare production

# Conclusion

The analysis presented in this report demonstrates a clear path forward for imports policy, demonstrating that aligning import regulations with domestic welfare principles is not only theoretical but also entirely practical.

By requiring imports to meet our existing animal welfare standards, New Zealand would create consistency across our food system - applying the same rules we've already established for our domestic producers and ensuring our own market reflects our own values.

The evidence shows this approach can work. Major exporters already have the capacity to supply New Zealand with higher-welfare products. The risk of trade retaliation is minimal, as demonstrated by California's successful implementation of similar standards. Consumer costs would be negligible - just $0.25 per week per person.

This policy would also strengthen New Zealand's agricultural sector. Currently, there's a double standard in our market: domestic producers must meet our welfare requirements while some imports come from systems we've prohibited. Establishing uniform standards across all products sold in New Zealand would create a level playing field where investment in higher-welfare systems is consistently valued. Economic modelling suggests this alignment could generate up to $29 million in additional domestic production as the currently hidden costs of unethical production are internalised for imported products.

The question isn't whether this policy is feasible - the data clearly shows it is. The question is whether New Zealand will take this logical next step to ensure our food system fully reflects the standards we've already chosen to uphold.

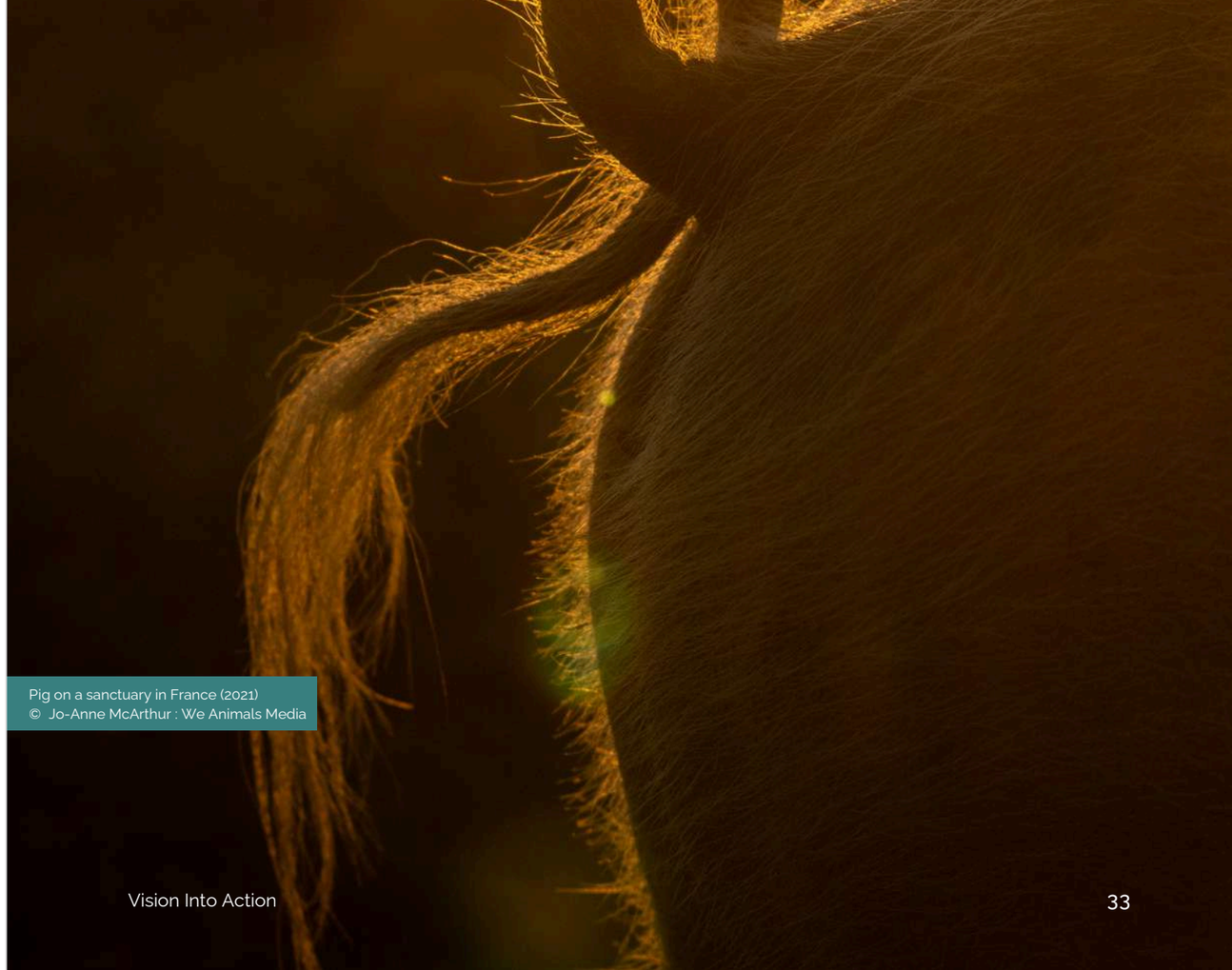
The evidence presented throughout this report underscores the policy's feasibility. Minimal economic impact, strong consumer support, and limited risk of international retaliation create a robust foundation for implementation. Moreover, this approach positions New Zealand at the forefront of a global trend toward more compassionate and transparent agricultural practices.

As the world increasingly recognises the importance of animal welfare, New Zealand has an opportunity to lead by example. This policy is not just about protecting animals—it's about upholding a national commitment to higher animal welfare, consumer transparency, and global agricultural leadership.

The time for action is now.



> *The importing of sub-standard meat products undercuts the efforts of NZ farmers and allows the mistreatment of animals to cross our borders. This is terrible for the animals and existential for our farmers.*
>
> **Marcus Daniell**, NZ Olympic tennis medalist who grew up on a sheep and beef farm



Pig on a sanctuary in France (2021)
© Jo-Anne McArthur : We Animals Media

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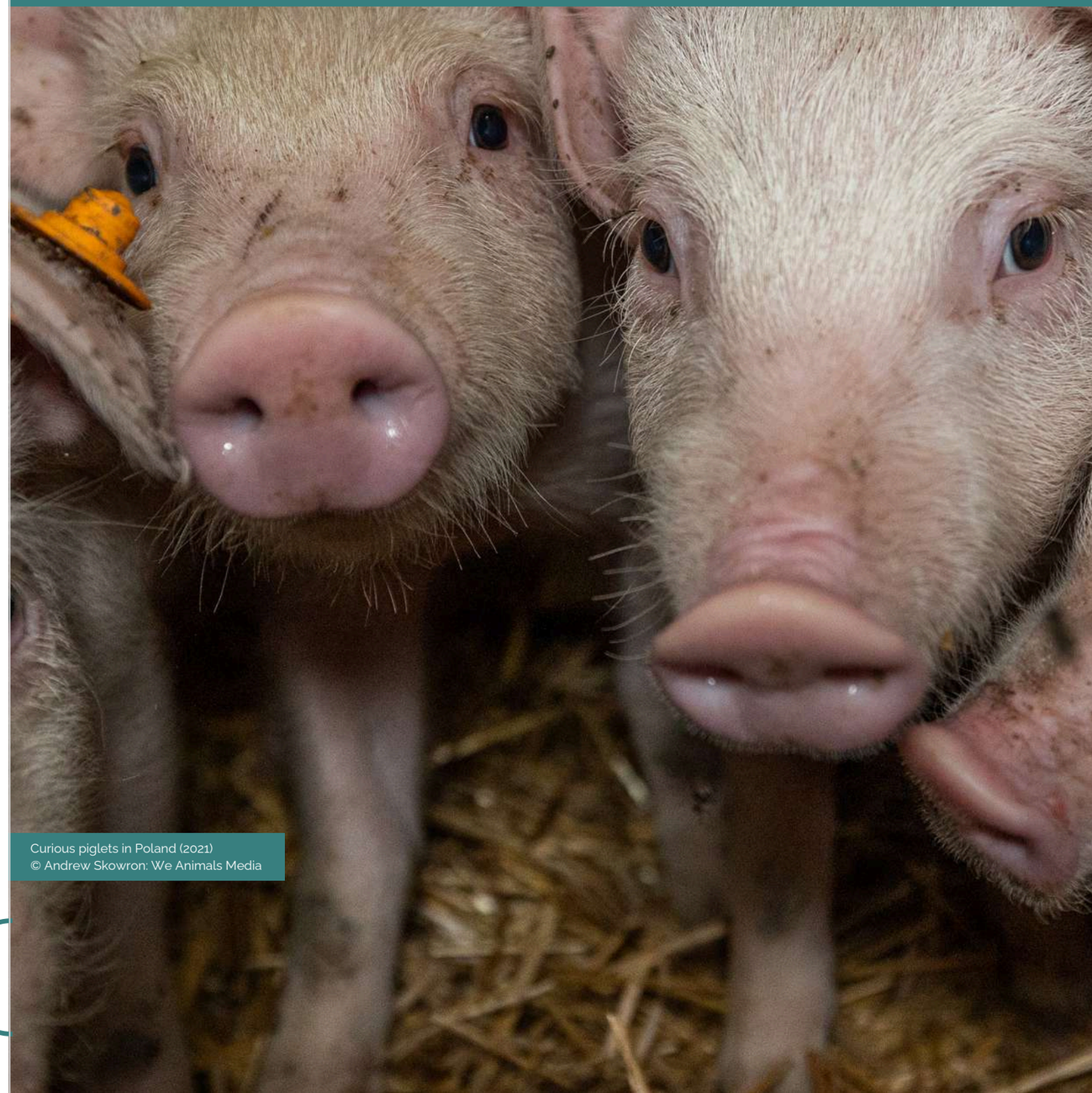
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> *We are committed to delivering products that meet the highest standards of quality and animal welfare. For this reason, we advocate that only products which meet New Zealand's regulatory and ethical criteria should be permitted for sale within the country.*

**Hamish and Angela Cottle**, Highgrounds Farm



Curious piglets in Poland (2021)
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