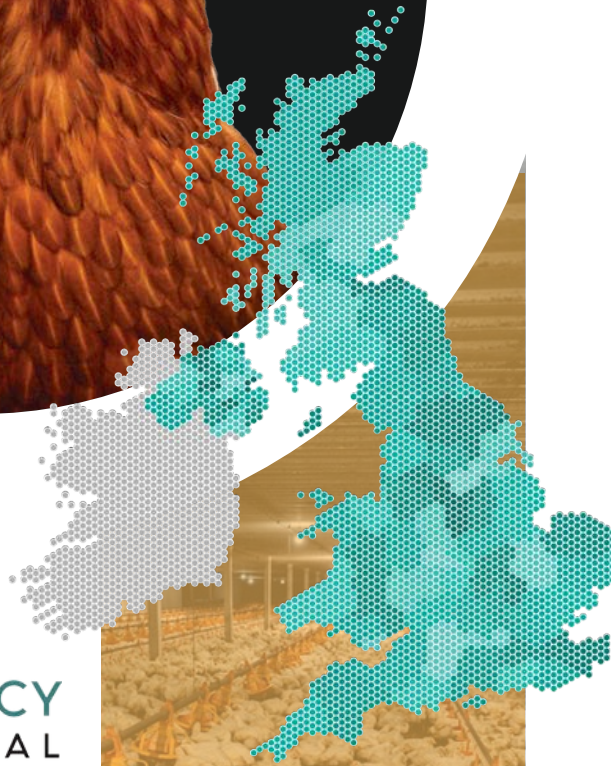


CLOSING THE WELFARE GAP

Why the UK Must Apply
Its Animal Protection
Standards to Imports

APRIL 2025



COMPASSION
in world farming 

RSPCA.





Foreword

The first animal welfare law in the world was passed in the UK in 1822. In the following years the UK saw many important improvements to animal welfare such as bans on dog fighting and bear-baiting.

In more recent decades, we've seen progress for farmed animals in the UK - banning barren battery cages for hens, sow stalls for pigs, fur farming, and foie gras production. Whilst there is still much improvement to be made - and we really *must* end caged farming entirely - we can still be proud of these steps forward. Our love for animals as a nation has never been in doubt.

However, a significant contradiction has emerged - a large percentage of animal products sold in the UK are imported from countries with less stringent welfare regulations. Take pork, for example - over half of the bacon, sausages and pork eaten in the UK comes from countries where pigs are still confined in sow stalls, a practice we banned in the 90s because we recognised its cruelty.

Closing this "welfare gap" must be a priority. It's about integrity. This revealing report details how our higher welfare standards are being undermined, to the detriment of both UK consumers and British farmers, who rightly worry about an uneven playing field that privileges overseas producers.

The fact is, we don't just want suffering outsourced overseas - we want an end to farmed animal cruelty entirely. The current situation does a serious disservice to the UK public who demanded change, to the tireless campaigners who fought so hard, and most of all, to the animals that are - unknowingly to most of the public - still being cruelly farmed for the UK market. It's simply common sense to expect imported products to meet the same higher welfare standards we enforce at home.

Two hundred years ago, Britain led the way in eliminating some of the most egregious forms of cruelty. Today, we must maintain that leadership position. We can and must require that overseas producers adhere to our own higher welfare standards. Only then can we truly feel proud of our nation's farmed animal welfare legacy, knowing laws are being upheld across the entire supply chain.

This report is urgent and thought-provoking, and it's essential that our political leaders take its recommendations seriously.

As an advocate who holds animal welfare close to my heart, I implore all readers to engage deeply with this report and find ways to turn its messages into meaningful, truly lasting change.

Deborah Meaden, entrepreneur and Dragons' Den Investor

Executive Summary

The UK must urgently close the "welfare gap" between its farmed animal welfare standards and imports via legislation. Currently many products come from countries where practices banned in the UK are still legal, creating a gap that is expected to grow with new trade deals, undermining public values and disadvantaging British farmers.

Loopholes Allow Lower Welfare Imports

- Current loopholes in the law permit lower welfare imports to enter the market.
- Of the UK's 88 trading partners that can currently, or may soon, export animal products to the UK without tariffs, 84 (95%) have lower animal welfare standards than the UK.¹
- The UK is effectively outsourcing animal cruelty, with already high numbers of farmed animals suffering overseas for the UK market. This is likely to increase.
- Existing legislation mandates that imports of meat must align with UK slaughter laws². Extending these requirements to include production methods would ensure consistency and uphold welfare standards.

Examples of lower welfare imports

- **Battery cages:** Though barren battery cages for egg-laying hens were banned in 2012, new trade deals with countries like India and Mexico risk bringing these products to UK shelves.
- **Sow stalls:** Over 50%³ of the pork imported into the UK is from countries that still allow the use of sow stalls, a practice banned in the UK since the 90s.
- **Fur and foie gras:** Even though the production of foie gras via force feeding and the farming of animals for their fur is banned in the UK, the importation of these inhumane products is still currently allowed.



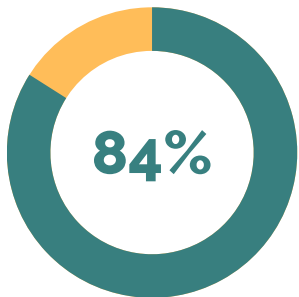
SOW IN A SOW STALL IN POLAND (2022)
© FARM TRANSPARENCY PROJECT / HUMAN CRUELITIES

A widening welfare gap

- Currently the UK still imports many animal products from the EU, where there are already key differences in areas such as the use of sow stalls, banned in the UK but still in use in the EU. As the UK pursues an independent trade policy in the post-Brexit era, the risk of compromising previous animal welfare gains is intensifying.
- Recent and upcoming trade agreements with countries like the US, India, and Mexico could lead to more imports from countries with practices illegal in the UK, potentially undermining decades of progress.
- The UK's trade deals involve tariff reductions over at least 10 years, meaning that the true impact may not be seen for some time yet will cause significant detriment to animal welfare if left unaddressed.
- Defra has promised to "protect farmers from being undercut by low welfare and low standards in trade deals."⁴ Relying solely on negotiations is insufficient. Comprehensive legislation offers broader and more effective safeguards than a fragmented approach that might be compromised during negotiations.

British public expectations and farmers are being undermined

- British people put significant value on animal welfare. Many people are unknowingly buying meat, eggs or dairy that has been produced in lower welfare systems and that they would not expect to be allowed on UK supermarket shelves.
- Public support for closing the imports loophole is high: A survey⁵ found that **84% of British people support restricting or banning low-welfare imports that don't meet UK standards.** Currently, except for slaughter regulations, no UK farmed animal welfare standards legally apply to imports.



- Farmers and industry are also united in their call for action as they face an uneven playing field where higher welfare British farmers are undercut by imports that do not meet those same standards.
- There is significant support from industry stakeholders to close this welfare gap, with the NFU stating, "The UK must not allow our existing high-standard animal welfare practices to be undercut by imports that have been produced in countries with lower production standards for animal welfare."⁶



FOIE GRAS PRODUCTION IN BELGIUM (2019) © FARM
TRANSPARENCY PROJECT / CASPER HILT

International trade law permits import restrictions

World Trade Organisation (WTO) case law demonstrates the legality of prohibiting the sale of animal products that fail to meet domestic standards⁷. If the government were to enact such legislation, it could justify these measures under the public morals exemption in Article XX(a) of the General Agreement on Tariffs and Trade (GATT).

The UK already employs similar import restrictions through regulations on slaughter import standards⁸, and legislation prohibiting importation of products such as shark fins⁹ and ivory¹⁰.

Further, legal assessments affirm that the UK's free trade agreements do not prevent it from implementing stricter import regulations based on welfare standards.¹¹

Recommendation

The UK Government must ensure all animal products sold in the UK—whether produced domestically or imported—meet British welfare standards.

This requires unilateral legislation making market access conditional on meeting UK standards or proven equivalent regulations. This approach would mirror existing provisions for humane slaughter standards, which require meat imports to have been produced using slaughter methods consistent with the UK's slaughter laws.

Extending the UK's welfare standards to imports would meet the expectations of the British public, ensure consumption does not fuel inhumane overseas production, provide a level playing field for UK farmers, and present an opportunity to strengthen the UK's leadership on farmed animal welfare at home and abroad.

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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. Trade figures provided are the most recent HMRC data available from 2024.

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PHOTO ABOVE: BROILER CHICK IN THAILAND (2019)
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PIGLET ON A SANCTUARY (2018)
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Introduction

Globally, animal welfare standards differ significantly. Despite taking steps to improve some areas of farmed animal welfare, the United Kingdom continues to import products from countries where animals face intensive confinement and inhumane practices. These lower-welfare imports undermine the UK's animal welfare commitments and British farmers.

This report analyses the current and future landscape of the UK's animal product imports, identifies critical gaps in welfare standards between the UK and those that export to it, and proposes a legislative policy solution to require imported animal products to meet domestic animal welfare standards.

Taking pride in being a "nation of animal lovers", the UK had set the pace for farmed animal welfare standards worldwide, including bans on sow stalls for pigs (1999) and battery cages for egg-laying hens (2012), as well as production bans on fur (2003) and foie gras (2007).

Despite this, a significant proportion of animal products sold in the UK are imported from countries with lower animal welfare regulations, produced using methods that would be illegal on British soil. This undermines the effectiveness of the UK's laws, its commitment to animal welfare, and effectively creates an uneven playing field that privileges lower-welfare overseas producers over higher welfare British farmers.

As the UK forges ahead with its independent trade policy in the post-Brexit era, the risk of compromising previous animal welfare gains has intensified.

Recent free trade agreements, such as that with Australia, have set concerning precedents by allowing imports from systems that would be illegal in the UK. These deals, coupled with the recent accession to the CPTPP, ongoing negotiations with nations like India, and Turkey, and talks of a US trade deal, threaten to flood the UK market with lower-welfare products, potentially erasing decades of progress in animal protection.

Moreover, trade deals the UK has negotiated involve tariff reductions over a period of at least 10 years, meaning that the true impact may not be seen for some time yet will cause significant detriment to animal welfare if left unaddressed.

The UK must require imported animal products to meet or exceed its domestic animal welfare standards. This solution is compliant with WTO rules and the UK's obligations under its FTAs.

By ensuring that the UK's commitment to animal welfare extends to products sold in the UK, regardless of origin, the Government can create a fairer, more consistent approach that reflects British values and supports higher-welfare farming practices abroad.

This import loophole outsources animal cruelty, allowing practices British voters have long rejected to enter the UK market through the back door.



BROILER CHICKENS IN THAILAND (2022)
© HAIG WORLD ANIMAL PROTECTION / WE ANIMALS MEDIA

Background

The concept of holding imports to UK standards has been a recurring topic of parliamentary discussions over time, attracting backing from across the political landscape.

During the Agriculture Act 2020 debates, MPs and Peers advocated for banning imports that fall below UK standards, though the then-government opposed amendments for import bans.¹²

During the 2020 Trade Act discussions, Labour Leader Sir Keir Starmer proposed amendments requiring agricultural imports to meet UK standards for animal welfare, environmental protection, and food safety.¹³

In 2021, the Conservative Government's Animal Welfare Action Plan¹⁴ promised to strengthen protections post-Brexit, including potential bans on fur and foie gras imports through an Animals Abroad Bill. However, this legislation stalled in 2022.

More recently, Labour's 2024 election campaign pledged to ban foie gras imports¹⁵, and since the election, Defra has repeatedly committed to "protect farmers from being undercut by low welfare and low standards in trade deals."¹⁶

In February 2025, the European Commission unveiled its Vision for Agriculture and Food¹⁷, signaling an important commitment to extend EU animal welfare standards to imported products, providing a timely model for UK legislation.

Concrete action is now needed to close the imports loophole and deliver Labour's promised generational boost to animal welfare.



"It's so important that we support British farmers... **We must not let them be undercut on food standards in any future trade deals**"

SIR KEIR STARMER, 2020¹⁸

LEFT IMAGE: BROILER CHICKENS IN THAILAND (2022)
© HAIG WORLD ANIMAL PROTECTION / WE ANIMALS MEDIA

IMAGE ABOVE: MINK FUR FARMING IN FINLAND (2023)
© OIKEUTTA ELÄIMILLE / WE ANIMALS MEDIA

Overview of the UK's Animal Product Imports

Of the 88 countries with tariff-free access to the UK for animal products or are in negotiations for such access, 84 have animal welfare standards that are lower than the UK, with products coming in such as fur, foie gras and pork from regions with sow stalls.

The UK currently continues to import substantial amounts of animal products from the EU, reflecting historic trade ties. While UK welfare standards typically exceed or match EU minimums-such as the ban on sow stalls during pregnancy in the UK,¹⁹ - there are growing concerns about a rise in imports from other regions with lower welfare standards.

As new trade agreements are established or take effect, the UK may see a surge in imports from countries with weaker animal welfare protections, including India, Mexico and the US. The Department for Business and Trade is also prioritising²⁰ negotiations with other lower welfare countries including member countries of the Gulf Cooperation Council, Israel, South Korea, and Turkey. Additionally the UK's recent membership of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) may see an increase in lower welfare imports.

The UK must require imported animal products to meet or exceed its domestic animal welfare standards in order to reflect public will and confidence.

Current and Potential Future Imports

Scale
t= Tonnage

- similar level of animal welfare legislation
- lower level of animal welfare legislation
- potential future source of lower welfare imports
- EU standards similar to the UK but in some cases are lower

All data from HMRC, 2024²¹

*Comparisons consider legislation. Due to agreements, some imported products may be produced to UK standards.

Pork

Netherlands	141,972 t (23%)
Denmark	122,673 t (20%)
Germany	79,868 t (13%)
Ireland	62,255 t (10%)
France	55,290 t (9%)
Belgium	49,934 t (8%)
Spain	48,434 t (8%)
Poland	35,112 t (6%)
Other	18,418 t (3%)
United States	TA in negotiation
Canada	Awaiting ratification under CPTPP

Poultry meat

Poland	262,292 t (26%)
Thailand	193,744 t (19%)
Netherlands	170,332 t (17%)
Germany	62,656 t (6%)
Ireland	54,472 t (5%)
Brazil	53,302 t (5%)
Other	209,829 t (22%)
India	FTA in negotiation
Mexico	Awaiting ratification under CPTPP

Eggs and egg products

Netherlands	40,307 t (44%)
Poland	20,713 t (23%)
Belgium	6,255 t (7%)
Other	24,296 t (26%)
India	FTA in negotiation
Mexico	Awaiting ratification under CPTPP

Foie gras

France	14.5 t (46%)
Hungary	10.9 t (34%)
Belgium	3.3 t (11%)
Other	3.1 t (9%)

Wool

New Zealand	5,414 t (13%)
Turkey	4,858 t (12%)
Ireland	4,688 t (11%)
Other	26,966 t (64%)
Australia	Increase possible following reduced tariffs

Sheep meat

New Zealand	40,710 t (60%)
Australia	17,793 t (26%)
Ireland	6,859 t (10%)
Other	2,517 t (4%)

Fur

China	271.5 t (50%)
Germany	63.1 t (12%)
Turkey	62.1 t (12%)
France	32.8 t (6%)
Other	110.1 t (20%)

Photo credits:
Sow stalls NA: © Jo-Anne McArthur / We Animals Media
Sow stall EU: © Farm Transparency Project / human.cruelties
Foie gras: © Pierre Parcoeur / We Animals
Battery cages: © Shatabdi Chakrabarti / FIAPO / We Animals Media
Fur: Kelly Guerin / We Animals
Mulesing: © Patty Mark / alv.org.au

Animal Welfare Standards in the UK: British People Care

UK animal welfare standards are born of a long tradition, with the UK being the first state worldwide to pass national legislation to protect animals in 1822. People put significant value on animal welfare, with the public known as a “nation of animal lovers”. This assertion is enforced by polling data:

- *Nine out of ten British people consider that animal welfare is an important issue to address.*²²
- *71% believe that it is never acceptable to cause pain and suffering to animals.*²³
- *83% feel that animal welfare should be protected by government legislation.*²⁴
- *84% – 5 out of 6 people – support putting restrictions or bans on low-welfare imports that do not meet UK production standards.*²⁵

BATTERY CAGES

The UK banned barren battery cages for egg-laying hens in 2012,²⁶ along with the rest of the EU. In a battery cage there is less space than an A4 sheet of paper per bird, leaving them unable to perform natural behaviours such as dust bathing and nesting.

Currently most of the UK’s egg imports come from EU countries that have also banned the use of barren battery cages. However, future trade agreements with countries like India and Mexico may result in imports of eggs and egg products - most likely in powder or liquid form rather than shell eggs²⁷ - that have been produced using battery cages.

The UK currently still has “enriched” cages.

SOW STALLS

The UK banned the use of sow stalls in 1999²⁸ due to welfare concerns. In sow stalls, pigs are confined to narrow cages where they cannot perform basic behaviours, such as being able to turn around.

Over half of the pork consumed in the UK is imported. The majority of it currently comes from EU countries that still allow their use for up to 28 days per pregnancy cycle.²⁹



FOIE GRAS

Producing foie gras in the UK by means of force-feeding has been effectively banned since 2007³⁰.

Nevertheless, the importation of foie gras has continued, with an estimated 32 tonnes imported from the EU in 2024³¹.

Prior to the 2024 election, now Secretary of State for Defra, Steve Reed MP, stated of foie gras, “That is just shocking. Beyond disgusting. They’re force feeding these terrified animals. Labour will ban the import of foie gras that is made following these abhorrent cruel practices.”³²

FUR

Over twenty years ago, the Fur Farming (Prohibition) Act³³ banned fur farming in the UK on public morality grounds. However, this legislation applies only to domestic production and not to imports.

Despite the ban, the UK still remains, in effect, a major player on the international fur market by allowing importation of those products. Two thirds of fur pelts are sold through auction houses in international trading centres such as London, which forms a part of the supply chain for fur products.³⁴ This loophole in the law runs contrary to the spirit of the ban and the broad public will of the UK public supporting that ban.

LIVE LAMB CUTTING (MULESING)

One of the welfare issues in sheep farming is live lamb cutting (mulesing). It is a painful procedure that involves cutting pieces of skin from around a lamb’s rear and tail.

Live lamb cutting is illegal in the UK. However, it is common in Australia. Australia is potentially a significant future source of wool, following the UK-Australia free trade agreement that cut UK tariffs on Australian merino wool from 8% to 0%.



TOP LEFT PAGE PHOTO: PIG IN A SOW STALL IN CANADA (2022) © JO-ANNE MCARTHUR / WE ANIMALS MEDIA
BOTTOM LEFT PAGE PHOTO: AN EGG-LAYING HEN WITH A SWOLLEN BEAK IN A BATTERY CAGE IN INDIA (2024) © ANIMAL POLICY INTERNATIONAL

TOP RIGHT PAGE PHOTO: FORCE FEEDING A DUCK FOR FOIE GRAS IN SPAIN (2011) © LUIS TATO / WE ANIMALS MEDIA
MIDDLE RIGHT PAGE PHOTO: MINKS IN A CAGE IN A FUR FARM IN ITALY (2012) © STEFANO BELACCHI / ESSERE ANIMALI / WE ANIMALS
MULESING PERFORMED ON A LAMB IN AUSTRALIA © PATTY MARK / ALV.ORG.AU

Lower Welfare Imports Unfair Towards British Farmers

Current legislation inadvertently favours imported goods produced to lower welfare standards, creating a challenging market where higher welfare British farmers are forced to compete with overseas producers who often reduce costs by using lower welfare systems that are illegal in the UK.

UK industry has been outspoken and vocal on this issue. A 2022 ResPublica report³⁵, commissioned by the National Farmers Union and the RSPCA, emphasised the risk of lower-standard imports undermining the UK's animal welfare standards. The NFU has stated that "The UK must not allow our existing high-standard animal welfare practices to be undercut by imports that have been produced in countries with lower production standards for animal welfare".³⁶ In 2020, the NFU ran a petition urging the government to establish safeguards against this risk, attracting over one million signatures.³⁷

In addition, in 2023, the Environment, Food and Rural Affairs Select Committee (EFRA) initiated a call for evidence on UK trade policy in food and agriculture, soliciting input on agri-food strategy and oversight.³⁸ Various industry bodies, including Dairy UK, the British Egg Industry Council, and Quality Meat Scotland, voiced their concerns about potential challenges such as unfair competition, risks associated with trade agreements like the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), and the potential for lower-standard meat, egg and dairy imports to enter the UK through certain free trade agreements.

Notably, the NFU published an open letter³⁹ in 2024, addressed to the three main UK political parties, calling for action to safeguard British farmers and growers from food imports that would be illegal to produce in the UK. Both the National Pig Association and the British Egg Industry Council also included specific demands in their 2024 manifestos calling for future trade deals to exclude products from production systems that would be illegal in the UK.^{40 41}

These industry positions underscore a growing awareness that trade must not only protect the UK's welfare standards but also the need to ensure fair competition for domestic producers who adhere to British standards.

Government policy appears to recognise the unfairness of lower-welfare imports, with Defra repeatedly stating a commitment to *"protect farmers from being undercut by low welfare and low standards in trade deals."*⁴²



"We cannot demand high welfare and environmental standards from our British producers if the Government then undercut them with lower quality imports."

STEVE REED, Secretary of State for Environment, Food and Rural Affairs, (as Shadow Secretary), 2024⁴³

LEFT IMAGE: SAVE BRITISH FARMING DEMONSTRATION PARLIAMENT SQUARE (2020) BARRY MARSH/FLICKR

RIGHT IMAGE: SHEEP IN AUSTRALIA (2020)
© JO-ANNE MCARTHUR / WE ANIMALS MEDIA

Lower Welfare Imports are Likely to Increase with New Trade Agreements

*The welfare gap in international trade is substantial. 95% (84 out of 88 countries) that have or are negotiating tariff-free access to UK markets for animal products have animal welfare standards below those required by British law.*⁴⁴

Post Brexit the United Kingdom has been actively negotiating several free trade agreements (FTAs) that may heighten the risk of importing goods with lower welfare standards. In July 2024, the Department for Business and Trade announced that Trade Secretary Jonathan Reynolds would lead negotiations with **India, the Gulf Cooperation Council, Israel, South Korea, Switzerland, and Turkey.** These agreements could significantly reduce or eliminate tariffs on animal products, potentially allowing further imports produced using farming practices that are prohibited in the UK due to welfare concerns.

Additionally, the UK formally joined the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) in December 2024. As of April 2025, there have also been heightened concerns about the potential effects of a **rushed trade deal between the UK and the US** under the new administration.



INDIA FTA

The UK-India FTA talks have been ongoing since January 2022, with the current Labour government prioritising completion since relaunching negotiations in January 2025.⁴⁴ This potential agreement poses significant animal welfare concerns due to the vast differences in farming practices between the two nations.

India stands as the world's third largest egg producer⁴⁵ and fifth largest poultry producer, with ambitious plans to expand these sectors further.⁴⁶ Approximately 90%⁴⁷ of Indian eggs come from battery cage systems—a practice explicitly banned in the UK since 2012 due to welfare concerns. These systems severely restrict hen movement and natural behaviours, causing significant welfare issues.

The British Egg Industry Council has warned⁴⁸ that while fresh shell egg imports may not pose a major threat, processed egg products present a serious concern. Liquid or powdered egg imports from countries, like India, using production methods banned in the UK, could severely impact the domestic industry. With approximately a fifth of British eggs used for egg products, competition from lower-welfare imports could force UK egg processors out of business, disrupt the supply chain and potentially raise consumer prices.⁴⁹



US Trade Agreement

Previous negotiations with the US saw the US Government push aggressively for unrestricted access to the UK market for agri-food products, including hormone-treated beef and chlorine-washed chicken,⁵⁰ both practices that are illegal in the UK.

While much previous and current public discussion around a potential US-UK trade deal has centered on food safety issues like chlorinated chicken, the animal welfare implications are equally concerning. The United States has no federal legislation protecting farmed animals during rearing and the Animal Welfare Act 1966 explicitly excludes farmed animals, including poultry and fish, from its scope, creating a vastly different regulatory environment to the UK.⁵¹

Battery cages for layer hens are only banned in eleven US states. Similarly, sow stalls, which severely restrict movement for pregnant pigs, remain legal in 39 US states despite being banned in the UK since 1999.⁵² Painful procedures like tail docking and castration on pigs are routinely performed without pain relief in US farming operations. US poultry are excluded from humane slaughter laws, with no federal requirements for stunning before slaughter.⁵³

Additionally, antibiotic use per animal in US farming averages five times higher than in the UK, with particularly stark differences in cattle (9-16 times higher) and turkeys (5.5 times higher).⁵⁴



MEXICO FTA

Mexican production standards feature minimal safeguards for the welfare of pigs, cattle, and chickens. The use of sow stalls, illegal in the UK, is permitted throughout Mexico.⁵⁵ Additionally, Mexican regulations do not mandate pain relief for common procedures like castration and tail docking.⁵⁶

When the CPTPP takes effect between Mexico and the UK following ratification, it could result in egg products being imported from Mexico from laying hens kept in barren battery cages.⁵⁷ Furthermore, in a bilateral trade agreement with the UK Mexico could seek larger tariff-free quotas in individual trade deals, potentially increasing the flow of lower-welfare products into the UK market.⁵⁸

As the world's sixth largest egg producer,⁵⁹ Mexico presents significant animal welfare concerns. 99%⁶⁰ of Mexican egg production relies on barren battery cage systems, banned in the UK.

Emerging Concerns with Other Trading Partners

Turkey launched trade negotiations with the UK in March 2024 and has been included in the Labour government's program of priority FTA negotiations.⁶¹ Turkey's animal welfare standards⁶² differ significantly from those in the UK. Turkish regulations allow battery cage systems with only 550cm² of space per hen. Additionally, there is no requirement for pre-stunning before slaughter.

South Korea, with whom negotiations were launched in November 2023, presents similar concerns.⁶³ The country has minimal safeguards for the welfare of pigs, broiler chickens, egg-laying hens, and dairy cattle. Battery cages remain permitted throughout South Korea.

Farmed Animals Impacted by UK Imports



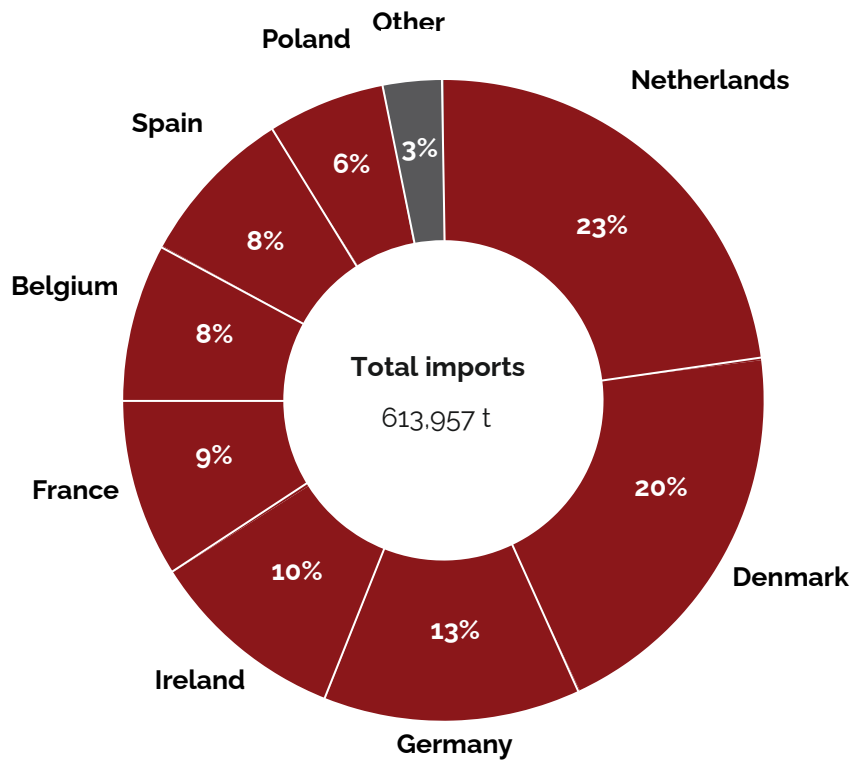
SOWS IN SOW STALLS IN CANADA (2022)
© JO-ANNE MCARTHUR / WE ANIMALS MEDIA

Pigs

Reflecting trade relationships still in existence pre-Brexit, in 2024, the primary countries exporting pork to the UK were Netherlands, Denmark, Germany, Ireland, France and Belgium. The total pork imports added up to 613,957 tonnes in 2024⁶⁴.

The imported tonnage equates to approximately 6.4 million pigs every year.

2023 UK pork production saw a decrease of 11% compared to 2022, falling to a five-year low. UK imports could see an increase in further imports of lower welfare pork following tariff reductions over a period of 10 years from new trade deals, such as the CPTPP.^{65 66}



Scale
t= Tonnage
● similar level of animal welfare standards
● lower level of animal welfare standards

Pork imports in 2024 by country. Source: HMRC Trade Data. *Comparisons are based on law. Due to agreements, some pork imported from Denmark is produced to UK standards.



CURIOUS PIGLETS IN POLAND (2021)
© ANDREW SKOWRON / WE ANIMALS MEDIA

COUNTRY	SOW STALLS	FARROWING CRATES	TAIL DOCKING	CO2 GASSING
UK 67 68 69	Banned.	Permitted.	Banned, exemptions exist. Pain relief required over 7 days of age.	Permitted.
Netherlands 70 71 72	Permitted for 4 days post insemination.	Permitted	Banned, exemptions exist.	Permitted.
Denmark *** 73 74	Permitted in housing built before 2015. Banned in all housing by 2035.	Permitted.	Banned, exemptions exist.	Permitted.
Germany 75 76 77 78	Permitted for 28 days per cycle. Banned from 2029.	Permitted. Limited to 5 days from 2036.	Banned, exemptions exist. Pain relief required over 4 days of age.	Permitted.
Ireland France Belgium Spain Poland 79 80 81 82	Permitted for 28 days per cycle.	Permitted	Banned, exemptions exist.	Permitted.
Possible future sources of lower welfare imports				
United States 83 84	Permitted.	Permitted.	Permitted.	Permitted.
Canada 85	Permitted.	Permitted.	Permitted.	Permitted.

The EU has a "partial ban" on sow stalls, allowing their use for up to 28 days per cycle. ***Comparisons are based on law. Due to agreements, some pork imported from Denmark is produced to UK standards.

“Lower animal welfare standards should not be imported, and we should be using our influence to drive up standards in the countries with which we do trade deals.”

BARONESS SUE HAYMAN OF ULLOCK, DEFRA
Minister in the House of Lords (as Shadow), 2024⁸⁶



SOW IN A SOW STALL IN POLAND. (2022)
© FARM TRANSPARENCY PROJECT: HUMAN.CRUELITIES

Pig Welfare: Sow stall and farrowing crates

Pig Welfare: Sow stalls and farrowing crates

The two major pig welfare issues are the use of sow stalls and farrowing crates.

Sow stalls are metal barred cages that are used to confine pregnant pigs (sows), for the duration of their pregnancy (a sow's pregnancy lasts ~115 days). Sow stalls are about the length and width of the sow (2 x 0.6m), making it impossible for the sow to turn around or to express natural behaviour such as foraging or socialising with other pigs. They can only lie down, sit, and stand, leading to higher incidences of aggressive behaviour.⁸⁷ The pigs are kept on plastic, metal, or concrete floors without bedding.⁸⁸ The UK banned sow stalls in 1999.

A farrowing crate is a small metal cage in which a sow is confined with her piglets off to the side. The sow is in the crate immediately before and shortly after giving birth (farrowing), for close to 5 weeks per pregnancy (2-3 times a year). They have a similar negative effect on the sow's welfare as sow stalls have, leaving them unable to move around, socialise, or perform foraging and maternal behaviour which can lead to frustration and aggressive behaviour towards piglets.⁸⁹ The use of farrowing crates is still legal in the UK, with approximately 60% of UK sows being kept in farrowing crates around the time of giving birth.⁹⁰



EGG-LAYING HENS IN AN OVERCROWDED BATTERY CAGE IN INDIA (2023)
© SHATABDI CHAKRABARTI / FIAPO / WE ANIMALS MEDIA

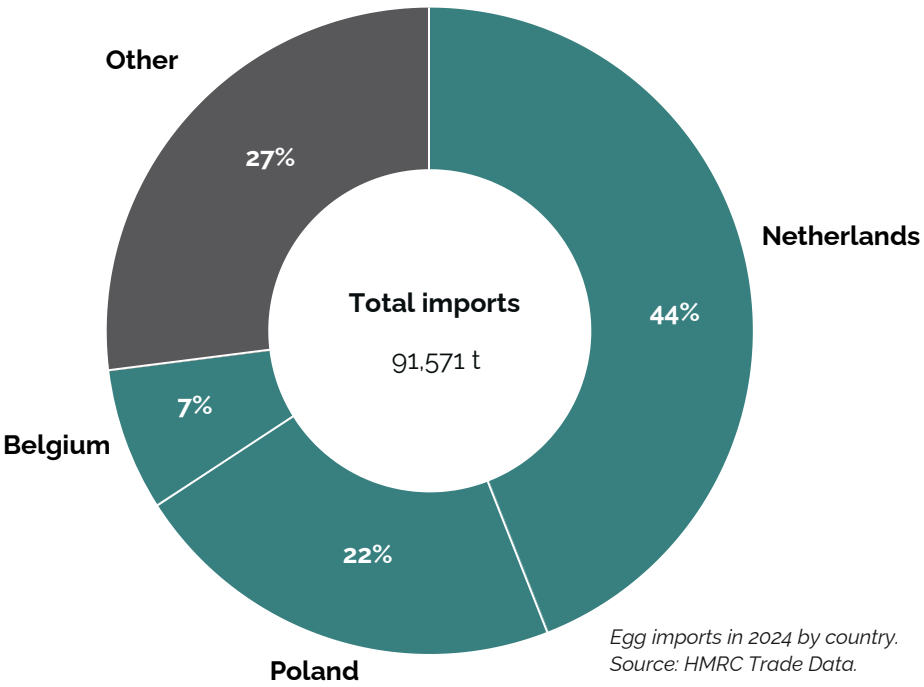
Layer Hens

In 2024, UK egg imports totaled 91,571 tonnes (including shell, dried, and liquid eggs).⁹¹

57.5% arrived as liquid eggs, mainly from the Netherlands. Shell eggs make up 39%, primarily from Poland, Spain and Ireland, while egg powder accounts for 3.5%. These imports represent the equivalent of 8 million layer hens.

While current imports are still largely coming from the EU, concerns about future sources of egg supply are emerging.⁹²

India, which lacks specific hen protection laws, is rapidly expanding its global egg exports.⁹³ Similarly, Mexico produces 99% of its eggs from battery-caged hens.⁹⁴ Increased imports from these countries would effectively mean the UK is outsourcing inhumane practices that are illegal domestically.



EGG LAYING HENS IN INDIA (2024) © ANIMAL POLICY INTERNATIONAL

COUNTRY	BATTERY CAGES	ENRICHED CAGES	BEAK TRIMMING
UK ⁹⁵	Banned.	Permitted.	Permitted until the age of 10 days.
Netherlands ^{96 97 98}	Banned.	Permitted.	Banned for laying hens, but permitted for parent (breeder) birds.
Poland ^{99 100}	Banned.	Permitted.	Permitted until the age of 10 days.
Belgium ¹⁰¹	Banned.	Permitted.	Permitted until the age of 10 days.

Possible future sources of low welfare imports

India ¹⁰²	Permitted.	Permitted.	Permitted.
Mexico ¹⁰³	Permitted.	Permitted.	Permitted.

Hen welfare in caged systems

Barren battery cages (conventional cages) are small wire cages where egg-laying hens spend most of their lives.¹⁰⁴ There are usually several birds in each cage, providing on average around 440 cm² of space per bird - less than an A4 sheet of paper.¹⁰⁵ The cages are stacked on top of each other inside a shed, which houses tens of thousands of hens. In battery cages hens cannot perform natural behaviour such as foraging, dust bathing, perching, and nesting, negatively affecting their wellbeing. Barren battery cages have been banned in the UK since 2012.¹⁰⁶

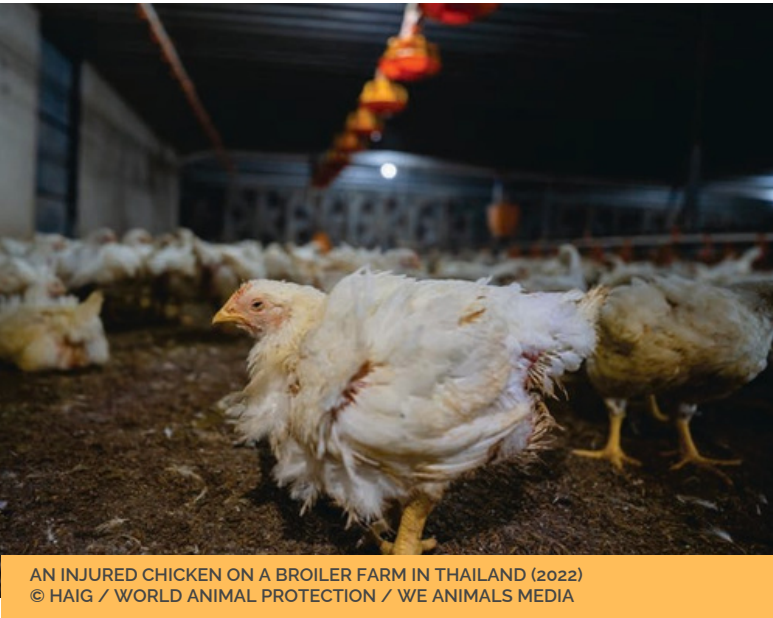
About 23% of hens in the UK are still caged in **"enriched" cages**,¹⁰⁷ allowing 750 cm² per bird. Most supermarkets in the UK have pledged not to stock any eggs from caged hens by 2025.¹⁰⁸ Enriched cages are banned or being phased out in 20 countries globally. Enriched cages for laying hens are prohibited in Austria, Luxembourg and Switzerland. In Germany, enriched cages are banned from 2025 (in exceptional cases from 2028), in Czech Republic from 2027 and in Slovakia from 2030.¹⁰⁹ France has banned the installation of any new enriched cage systems since 2018.¹¹⁰

Broiler Chickens

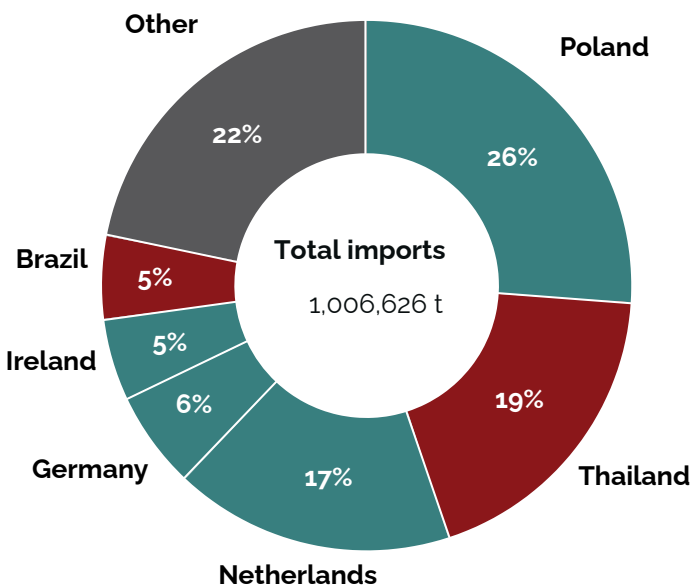
The UK imports nearly half its poultry meat — **1,006,626 tonnes in 2024**¹¹¹. This volume equates to approximately 570 million chickens annually, though this figure includes some duck and turkey meat.

Most imported meat comes from broiler chickens raised in industrial farm settings. While broiler farming commonly uses single-level, littered floor systems, cage systems are becoming increasingly prevalent worldwide, particularly in Russia, the Middle East and China. These caged systems allow for higher stocking densities and result in more injuries like scratches and bruises, while significantly restricting chicken movement.^{112 113} The UK requires littered floors throughout facilities and enforces maximum stocking density limits, UK regulations effectively prevent the use of broiler cages domestically.

CHICKEN ON A BROILER FARM IN INDIA (2024)
© ANIMAL POLICY INTERNATIONAL



AN INJURED CHICKEN ON A BROILER FARM IN THAILAND (2022)
© HAIG / WORLD ANIMAL PROTECTION / WE ANIMALS MEDIA



Poultry meat imports in 2024 by country. Source: HMRC Trade Data.

*Comparisons are based on law. Due to agreements with some retailers, some chicken meat imported from Thailand is produced to, or above, UK standards.

Scale

t= Tonnage

- similar level of animal welfare standards
- lower level of animal welfare standards

COUNTRY	STOCKING DENSITY LIMIT	ACCESS TO FLOOR WITH FILTER	STUNNING BEFORE SLAUGHTER	FAST GROWING BREEDS
UK 114 115 116	39 kg/m2 (42 kg/m2 in Northern Ireland).	Required, but no minimum depth.	Required.	Permitted.
Poland 117 118	42 kg/m2	Required, but no minimum depth.	Required.	Permitted.
Thailand* 119	No limit.	Not required.	Not required.	Permitted.
Netherlands 120	42 kg/m2	Required, but no minimum depth.	Required.	Permitted.
Germany 121	39 kg/m2	Required, but no minimum depth.	Required.	Permitted.
Ireland	42 kg/m2	Required, but no minimum depth.	Required.	Permitted.
Brazil 122	No limit.	Not required.	Required.	Permitted.

Possible future sources of lower welfare imports

India 123 124 125	No limit.	Not required.	Required.	Permitted.
Mexico 126 127	No limit.	Not required.	Required.	Permitted.

*Comparisons are based on law. Due to agreements with some retailers, some chicken meat imported from Thailand is produced to, or above, UK standards.

WELFARE ISSUES FOR BROILER CHICKENS

In intensive chicken farms welfare is compromised by overcrowding, barren environments and rapid growth.¹²⁸

Chickens can also suffer injury and stress through rough handling during catching, transport and slaughter.

Fast growing breeds

Studies indicate breeding for rapid growth also impacts bird health, with higher rates of leg issues, mobility problems and metabolic disorders in fast-growing strains. Globally, hundreds of companies have committed to moving away from fast growing breeds.

BROILER CHICKENS IN THAILAND (2022)
© HAIG / WORLD ANIMAL PROTECTION / WE ANIMALS MEDIA





SHEEP IN AUSTRALIA (2020)
© JO-ANNE MCARTHUR / WE ANIMALS MEDIA

Sheep

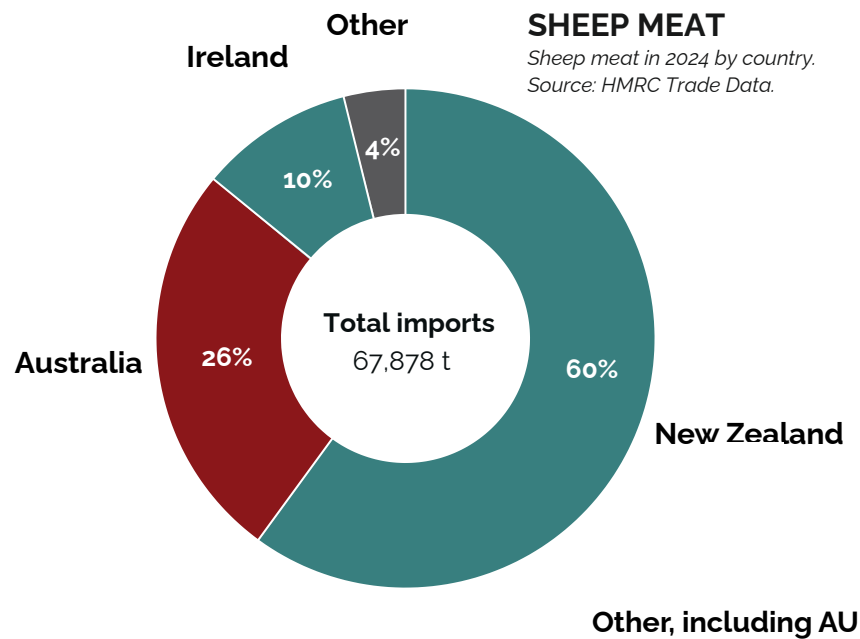
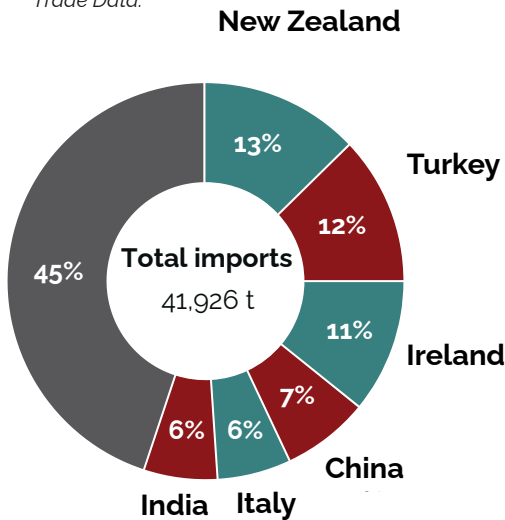
In 2024, the UK imported 67,878 tonnes of sheep meat,¹²⁹ equivalent to approximately 4.8 million animals, comprising about 38.8% of total UK consumption. In 2024, the UK's total sheep meat production was approximately 263,000 tonnes, representing a 7.9% decrease compared to the previous year.¹³⁰ Additionally, the UK imported 41,926 tonnes of wool in 2024¹³¹, primarily from New Zealand, Turkey, and Ireland.

One of the welfare issues in sheep production is live lamb cutting (mulesing), which is common in Australia.

Even though, in 2024, only 1.6% of UK's wool imports were from Australia, there is a significant risk for increase in the future following the UK-Australia free trade agreement that cut UK tariffs on Australian merino wool from 8% to 0%.

WOOL

Wool imports in 2024 by country. Source: HMRC Trade Data.



Scale

t= Tonnage

- similar level of animal welfare standards
- lower level of animal welfare standards

COUNTRY	LIVE LAMB CUTTING (MULESING)	TAIL DOCKING	CASTRATION	STUNNING BEFORE SLAUGHTER
UK 132 133	Banned.	Permitted. Pain relief required if a method other than rubber ring is used.	Permitted. Pain relief required over the age of 3 months.	Required.
New Zealand 134 135	Banned.	Permitted. Pain relief required over the age of 6 months.	Permitted. Pain relief required over the age of 6 months.	Required.
Turkey 136 137	Not applicable.	Permitted. Pain relief not required.	Permitted. Pain relief not required.	Not required.
Australia 138	Permitted.	Permitted. Pain relief required over the age of 6 months.	Permitted. Pain relief required over the age of 6 months.	Required.

Live lamb cutting (mulesing)

Live lamb cutting (mulesing) is a painful procedure that involves cutting pieces of skin from around a lamb's rear and tail. Merino sheep have been selectively bred to develop increased folds and wrinkles to maximise wool yield. This unnatural area can become moist with urine and contaminated with faeces, attracting blowflies to lay their eggs there. Live lamb cutting is used to create an area of bare scar tissue to prevent the flystrike. Since it is performed without anaesthesia and often without pain relief then it causes severe immediate and long- term pain to lambs.¹³⁹



MULESING PERFORMED ON A LAMB IN AUSTRALIA
© PATTY MARK / ALV.ORG.AU

Foie Gras: Ducks and Geese

UK foie gras imports increased from 28 tonnes in 2021 to 31.9 tonnes in 2024, representing approximately 53 thousand ducks and geese annually.¹⁴⁰

These imports come mainly from Hungary and France, with France dominating global production, although most imports into the UK come from Hungary.¹⁴¹ UK law banned foie gras production by means of force-feeding in 2007.¹⁴²

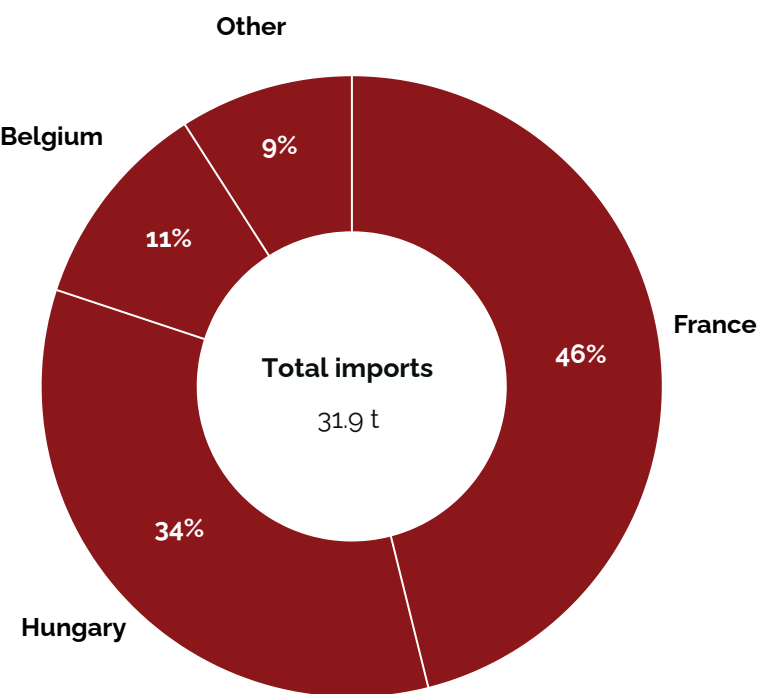
Scale

t= Tonnage

- similar level of animal welfare standards
- lower level of animal welfare standards



FOIE GRAS PRODUCTION IN BELGIUM (2019)
© FARM TRANSPARENCY PROJECT / CASPER HILT



Foie gras imports in 2024 by country. Source: HMRC Trade data

“That is just shocking. Beyond disgusting. They're force feeding these terrified animals. **Labour will ban the import of foie gras that is made following these abhorrent cruel practices.**”

STEVE REED MP, Secretary of State for Environment, Food and Rural Affairs, (as Shadow Secretary), 2024¹⁴³



FORCE FEEDING A DUCK FOR FOIE GRAS IN SPAIN (2011)
© LUIS TATO / WE ANIMALS MEDIA

Force-feeding

Foie gras, or 'fatty liver', is produced by force-feeding ducks and geese through inserting a feeding tube in their throat two or three times a day to allow food to be pumped in continuously. It is performed over a period of 12 to 15 days for ducks and 15 to 21 days for geese before they are slaughtered. The aim is to abnormally increase the size of the liver by up to 10 times than what it normally would be, causing severe stress during the force-feeding process. Additionally, the birds are usually kept in small cages, preventing them from moving around, spreading wings, and expressing other natural behaviour.¹⁴⁴

Since the production of foie gras by force-feeding in the UK is prohibited, no force-fed foie gras imports would be permitted after a lower welfare imports ban. This import ban would have a significant impact: it would put an end to the inhumane production of the product for the UK market, thereby strengthening the UK's leadership on farmed animal welfare.

A YouGov survey from 2022 showed overwhelming public support for a ban on the import of foie gras, with 86% of respondents opposing the force-feeding of animals and 81% supporting a ban on foie gras imports.¹⁴⁵

Fur: Minks, Foxes, Chinchillas, and Others —

Despite a ban on fur farming in the UK since 2003,¹⁴⁶ London remains a major international trading centre for fur pelts, forming a significant part of the supply chain for fur products.¹⁴⁷

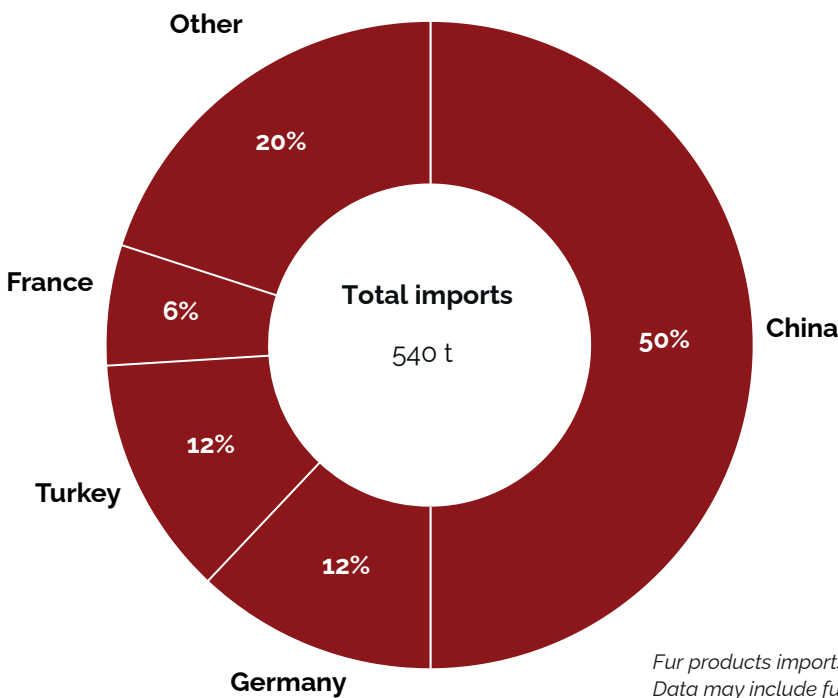
The fur industry is still responsible for the deaths of 20 million animals per year on fur farms.¹⁴⁸

In 2024 the UK imported a total of 540 tonnes of fur products, mostly from China, Germany and Turkey.

A YouGov survey from 2022 showed overwhelming public support for banning the import and sale of animal fur, with 73% of respondents supporting.¹⁴⁹



TOP LEFT: FUR FARM IN POLAND (2021) © FARM TRANSPARENCY PROJECT / ANIMALSAREBEINGSTOO
TOP RIGHT: FUR FARM IN ITALY (2012) © STEFANO BELACCHI / ESSERE ANIMALI / WE ANIMALS
BOTTOM LEFT: FUR FARM IN POLAND (2021) © FARM TRANSPARENCY PROJECT / ANIMALSAREBEINGSTOO
BOTTOM RIGHT: FUR FARM IN CANADA (2014) © JO-ANNE MCARTHUR / #MAKEFURHISTORY / WE ANIMALS MEDIA



Fur products imports in 2024 by country. Data may include fur from fur farming and wild caught. Source: HMRC Trade data

“Two decades have now passed since fur farming was banned in the UK. **I am proud to confirm once again that a Labour Government would take the necessary action on the importation of fur into Britain.** A Labour Britain will be a compassionate, fur-free Britain.”

ALEX SOBEL MP, then Shadow Minister for Nature Recovery and the Domestic Environment, 2023¹⁵⁰

A SILVER FOX LOOKS OUT FROM A SMALL CAGE AT A FUR FARM. POLAND. (2017) © ANDREW SKOWRON / WE ANIMALS

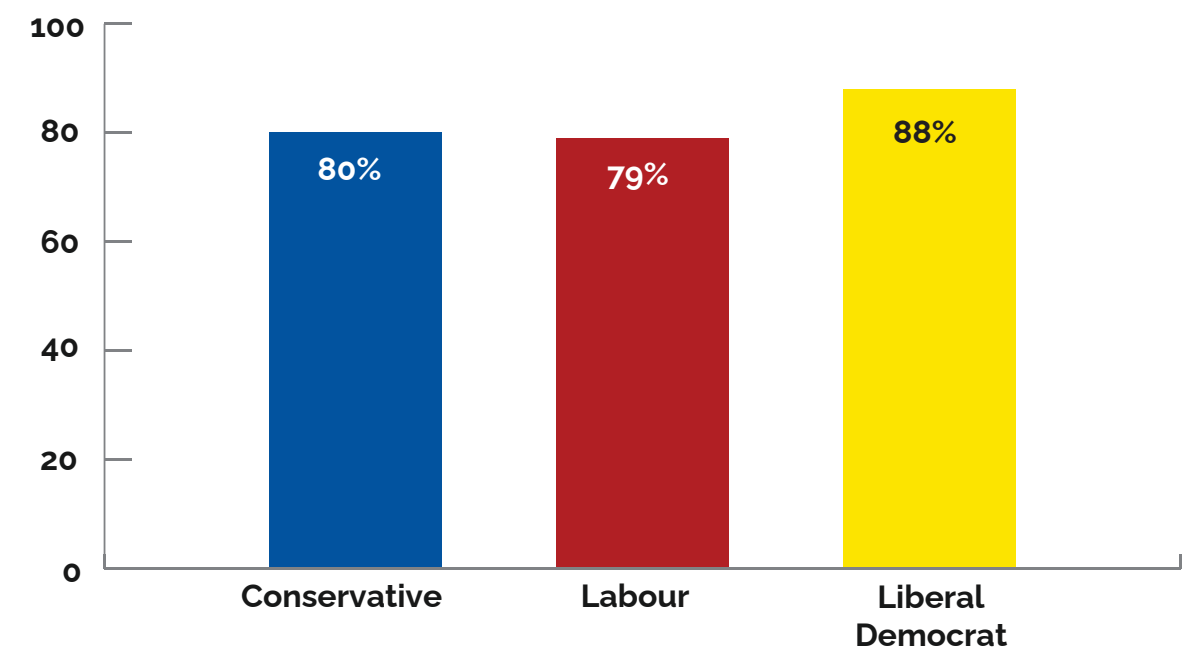
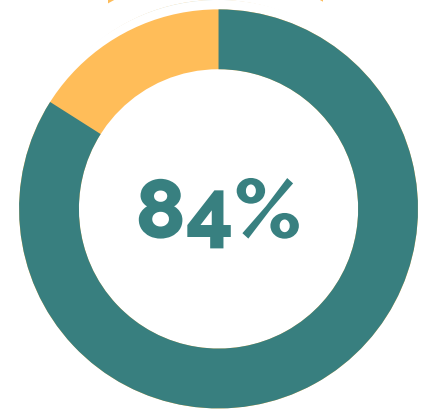
“Food standards are also a very huge concern to my constituents who are deeply worried that decades of progress in animal welfare, hygiene, husbandry and environmental management are going to be stripped away. Farmers and consumers will be worse off.”

FLEUR ANDERSON, Parliamentary Under-Secretary of State for Northern Ireland, 2020 (as MP)¹⁵¹

Public Support to Stop Cruel Imports is High

The British public, often referred to as “a nation of animal lovers,” place considerable importance on animal welfare, a sentiment reinforced by polling data which shows high levels of support for requiring imports to meet domestic animal welfare standards.

- A 2023 poll from Bryant Research showed that **84% – 5 out of 6 people – support putting restrictions or bans on low-welfare imports that do not meet UK production standards.**¹⁵²
- A Focaldata survey from 2023 showed that **77% of respondents agreed with the statement “When we ban a type of farming in the UK for being too cruel, we should also ban imports of products produced the same way overseas”**. Less than a quarter of people (23%) agree with the statement “we should not let our trading relationship with other countries be limited by animal welfare concerns.”¹⁵³
- A 2022 Focaldata survey indicated that among voters who supported specific parties in the 2019 election, a significant proportion strongly supports the UK banning imports of animal products, such as fur, where farming and production methods are banned in the UK. **The survey found that 80% of Conservative voters, 79% of Labour supporters, and 88% of Liberal Democrats are in favour of this measure.**¹⁵⁴



*Percentage of party supporters in the 2019 election who support (strongly) the UK banning imports of animal products, such as fur, where farming and production methods are banned in the UK.*¹⁵⁵

Legality and Precedent: Case Studies from the UK and Other Countries

Below is a summary of the full legal advice, “*Assessment of the feasibility of applying United Kingdom’s animal welfare standards to imported products under WTO law*” written by Clémentine Baldon and Nikos Braoudakis (Baldon Avocats), registered lawyers at the Paris bar, available at www.animalpolicyinternational.org in the form of a report and full legal opinion.¹⁵⁶

World Trade Organisation Case Law

An examination of the existing case law of the World Trade Organisation (WTO) shows that applying the UK’s animal welfare standards to imports would comply with WTO obligations, provided that the ban does not discriminate against imports by providing a more favourable regime for domestic products. In many cases applying the UK’s animal welfare standards to imports is easier to justify under the WTO rules if it is done through a sales ban rather than an import ban. Such a sales ban would apply to an inhumanely produced product irrespective of whether it was produced in the UK or abroad.

As animal welfare gains recognition in international trade law, more jurisdictions are implementing measures to enforce welfare standards on imports. Some WTO Members already incorporate such measures into their regulatory practices.¹⁵⁷ Apart from the EU’s seal products sales ban, which was upheld by the WTO’s Appellate Body, none of these measures, which address specific standards, practices or species, were ever challenged before the WTO.

If challenged at the WTO level, a ban on the sale of products that fail to meet British standards could be justified under the public morals exemption in Article XX(a) of GATT in accordance with WTO case law.¹⁵⁸

Free Trade Agreements Permit Import Restrictions

The UK’s free trade agreements (FTAs) do not appear to restrict the UK’s ability to prohibit or otherwise regulate imports of products derived from cruel practices in ways that would be admissible under WTO law. The UK Trade and Agriculture Commission has issued reports concerning three FTAs concluded by the UK and confirms that under all of them, the UK “*has the same rights as it would under WTO law to maintain and adopt protections*” in the area of animal welfare.¹⁵⁹

The UK should not conclude trade agreements that prevent it from requiring imports to meet UK animal welfare standards.



Public morals exemption allows for protections of animal welfare

As a member of the WTO and party to free trade agreements, the UK must abide by rules limiting barriers to trade.

A sales restriction that applies to both UK and imported products may not be in breach of the WTO rules if the product is seen by consumers as clearly different from a higher welfare alternative product. For example, many UK consumers buy free range eggs rather than eggs from caged hens as they view them as different products. Accordingly, a ban on the sale of eggs from caged hens (domestically produced or imported) may be consistent with the WTO rules, provided that there is no discrimination against imported free range eggs.

In other cases, when a national measure is found to be inconsistent with the substantive provisions of the General Agreement on Tariffs and Trade (GATT) such as Article III:4, the measure may still be justified under the general exception of Article XX(a) GATT. **WTO case law shows that countries can justify import or sales restrictions on animal products that do not meet domestic animal welfare standards under the public morals exemption provided for in the GATT Article XX(a).**

Animal welfare is now widely recognised to be part of public morals under GATT. The term “public morals” generally refer to “standards of right or wrong” prevailing in a given territory.¹⁶⁰

Restrictions – e.g. import bans, market access requirements – are already relatively common in the regulatory practice of some WTO Members.

Many measures consist in an outright ban on the import or marketing of animal products considered unacceptable on moral and ethical grounds (e.g. the cat and dog fur import bans in the EU¹⁶¹ and the US,¹⁶² the whales or other cetacean products import ban in the EU,¹⁶³ the seal products marketing ban in the EU,¹⁶⁴ the animal fur products sales ban in California¹⁶⁵). Importantly, the UK already applies some animal welfare import bans via retained EU regulation and others (e.g. the ivory products trade ban;¹⁶⁶ and the shark fins trade ban¹⁶⁷).



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Precedence for UK Import Restrictions

The United Kingdom has already established several important precedents regarding import restrictions of various animal products. Examples include:

- The **Slaughter Regulation** was adopted in 2009 for the protection of animals at the time of killing. It restricts meat imports from outside the EU that are not accompanied with a certificate stating the meat comes from animals slaughtered to welfare standards at least equivalent to those of the EU.¹⁶⁸ In the UK, it applies under retained EU Regulation 1099/2009.
- The **Shark Fins Act** passed into law in June 2023.¹⁶⁹ The Act bans the import and export of detached shark fins, including all products containing shark fins such as tinned shark fin soup.
- The **Ivory Act** which came into force in 2018 bans imports of ivory products.¹⁷⁰

International Examples

There are also several international examples where countries have limited imports due to concerns over animal welfare.

EC — Seal Products Case

In 2009, the European Union banned the importation and placing on the market of seal products. Canada challenged the ban at the WTO, claiming that the measures were inconsistent with the obligations of the EU under the WTO rules. The WTO Appellate Body upheld the WTO Panel's finding that the EU Seal Regime is 'necessary to protect public morals' within the meaning of Article XX(a) of the GATT 1994." It was also stated that animal welfare is "an ethical responsibility for human beings in general" and "a globally recognised issue."¹⁷¹ The case is significant because it confirmed that animal welfare concerns are a legitimate reason for WTO members to restrict trade where animal welfare concerns are an issue of public morals.

California's Proposition 12

Proposition 12 is a California state law that was passed in 2018. It bans types of confinement such as sow stalls, veal crates, and cages for hens.¹⁷² The law applies to products sold in California, regardless of whether they are produced locally or imported from outside of the state, setting an important precedent of extending local standards to imported products. In 2023, the U.S. Supreme Court ruled that Proposition 12 is constitutional after the National Pork Producers Council and the American Farm Bureau Federation filed an unsuccessful lawsuit claiming that Proposition 12 violated the U.S. Constitution's Commerce Clause. No challenge to Proposition 12 was ever made under the WTO Rules.

Further case studies are listed in the report "Applying the UK's Animal Welfare Standards to Imports" that examines the legality of the proposed policy.

"It is good...that we farm to particularly high animal welfare standards in this country, but **we should not allow the sale of produce in this country that does not meet those same standards.** When we do our trade deals, we need to be really careful about what we are opening a door to. We should always first support our own farmers and the standards that we need to meet in this country."

DANIEL ZEICHNER MP, Minister of State DEFRA
(as shadow), 2024¹⁷³

Policy in Practice: Extending the UK's Animal Welfare Standards to Imported Products

The Policy

The Government has a compelling responsibility to uphold UK animal welfare standards for all products on the market, regardless of their origin. Negotiating this through trade agreements is inadequate. To this end, it should **introduce primary legislation requiring all producers wishing to export to the UK to meet British animal welfare standards or, in some cases, demonstrably equivalent regulations.**

Extending the UK's welfare standards to imports would consistently meet the expectations of the British public, ensure consumption does not support inhumane overseas production, provide a level playing field for UK farmers and present an opportunity to strengthen the UK's leadership on farmed animal welfare at home and abroad.

The proposed legislation would ban marketing of any animal products produced in ways that don't comply with UK welfare laws.

Targeted legislation could prohibit certain products from being marketed in the UK if they are produced in ways regarded as inhumane and could include an enabling power which allows other products or practices to be added in the future via secondary legislation. Named products should include key lower-welfare imports:

- eggs and egg products from layer hens kept in barren battery cages
- pork and pork products produced from sows in sow stalls
- foie gras produced by force-feeding
- fur products

Where UK law does not prohibit a specific inhumane practice or housing system but nonetheless requires a certain level of animal treatment or certain welfare outcomes, **the UK could require imports to meet standards equivalent to the UK's animal welfare laws,** as set out in key legislation such as:

- The Animal Welfare Act 2006
- The Welfare of Farmed Animals Regulation 2007
- The Mutilations (Permitted Procedures) Regulations 2007
- UK legislation on welfare during transport and slaughter
- (and devolved equivalents)

Why not negotiate animal welfare through trade deals?

We should focus on legislative action to establish consistent welfare standards for all imported goods rather than through trade agreements. This would involve setting baseline rules that would better safeguard farmers and animal welfare as well as addressing the root problem.

Trying to solve the loophole only through FTAs fails to address existing imports from countries where no FTA is in place, leaving imports from some lower-welfare countries untouched. The result would be a large number of lower-welfare imports from other trade partners continuing to flood into the UK. Additionally, each FTA is negotiated individually leaving scope for future governments to compromise on standards.

In essence, comprehensive legislation provides broader and more effective protection than a piecemeal approach through trade deals.

Policy Enforcement

Building on established practices from California's Proposition 12, the EU Slaughter Regulation, and existing UK animal health regulations, new legislation on lower welfare imports could be effectively enforced through a robust certification system. This would require importers to obtain specific licences, certificates, and approvals from UK authorities. **The exact mode of enforcement will depend on whether an import or a sales ban is applied to a given product.**

ENFORCING AN IMPORT BAN

There are existing regulations that apply to ensure imports entering the UK market meet domestic animal health standards which could provide a model for import restrictions on welfare grounds.

First, a country must be approved to export animals and animal products to Great Britain.¹⁷⁴ A competent authority in that country files an application to the UK Office for Sanitary and Phytosanitary (SPS) Trade Assurance. If approved, this establishes blanket requirements for the import of animal products targeting treatments or prohibitions on products from certain regions to limit the spread of pathogens.

Premises, including packing and processing centres, that export to Great Britain are also required to pre-register as approved establishments,¹⁷⁵ a process that also includes an application from competent authorities to the SPS trade Assurance.¹⁷⁶

Imports of products of animal origin (POAO) for human consumption also need a GB health certificate issued from the country of export. These are completed by a certifying officer authorised by the competent authority of the exporting country.¹⁷⁷ Importers and import agents must use this certificate to notify authorities in Great Britain at least one working day before animals or POAO arrive from EU and non-EU countries using the 'Import of products, animals, food and feed system' (IPAFFS) run by the Animal and Plant Health Agency (APHA).¹⁷⁸



A MINK STANDS IN A CAGE AT A FUR FARM IN ITALY (2012)
© STEFANO BELACCHI / ESSERE ANIMALI / WE ANIMALS

ENFORCING AN IMPORT BAN: CASE STUDY

EU Slaughter Regulation

Enforcement of EU regulations on the protection of animals at the time of killing on imported fresh meat and meat products is achieved in a similar manner to the GB health certificate. Imports are subject to certification by a veterinary officer authorised by the competent authority of the exporting country, which ensures controls throughout the production chain, covering relevant EU legislation. These non-EU country authorities must be recognised by the European Commission's Directorate-General for Health and Food Safety to be authorised to export to the EU.¹⁷⁹ The application for such recognition begins with the submission of a written request to the Directorate General for Health and Food Safety of the European Commission demonstrating the authority can fulfil all relevant legal requirements.

The control systems are intermittently audited by the EU's Health and Food Audits and Analysis division. It is composed of a team of 160 professionals that carries out controls to ensure that the national authorities exporting to the EU are fulfilling their legal obligations.¹⁸⁰

In the UK, the EU Slaughter Regulation is applied under retained EU Regulation 1099/2009 and serves as an important precedent of applying specific standards to imports.



BROILER CHICK IN MEXICO (2018) © JO-ANNE MCARTHUR / ANIMAL EQUALITY / WE ANIMALS MEDIA

ENFORCING A SALES BAN

In a recent consultation from DEFRA, a monitoring and enforcement system for accurate animal welfare labelling was outlined.¹⁸¹ It would make Food Business Operators (FBO), businesses under whose name foods are marketed or sold, responsible for ensuring the accuracy of the labelling applied to their products. This would both make FBOs liable for any mislabelling of products and shift the burden of proof to the FBO to demonstrate their product meets a tier of labelling requirements. Enforcement of FBO reporting would fall to an enforcement authority designated by the UK Government, the Scottish Government, Welsh Government and the Northern Ireland Executive.

A similar system could be used for enforcing a lower welfare sales ban. The UK Government would provide guidance for FBOs on the relevant requirements as well as a register of applicable farm assurance schemes that they can use. Schemes can submit evidence to be included on the register. Similarly countries who have baseline requirements that meet the UK requirements could submit evidence to be added to the registry. Evidence that products originate from a registered country could then be used by FBOs as evidence of compliance with the UK standards.

ENFORCING A SALES BAN: CASE STUDY

Proposition 12 in California

To implement Proposition 12 (a sale ban on egg, pork and veal confinement systems), an Animal Care Program (ACP) was set up within the Animal Health and Food Safety Services division of the California Department of Food and Agriculture (CDFA).¹⁸² The ACP ensures compliance of domestic and foreign production and distribution operations with California's Health and Safety Code and Animal Confinement Regulations by issuing certificates of compliance.¹⁸³ These can be issued by the CDFA itself, a certifying agent accredited by CDFA, or a recognised government entity.

Accredited agents are then responsible for ensuring compliance with these standards typically through an initial on-site inspection and then subsequently through yearly inspections of each production unit, facility, and site that produces or distributes covered products.¹⁸⁴

Distributors of animal products concerned by the law are required to register with the CDFA by submitting a valid third-party certification, which must be renewed annually.¹⁸⁵

Retail locations, food processors or restaurants who sell covered products operate under a good-faith reliance rule if they receive a written certification of compliance from their distributors. This means they are only liable for the sale of covered products if they knowingly allow the sale of non-certified products.¹⁸⁶

Transition Period

Proposition 12 in California had a transition period between 1 and 5 years for different requirements coming into effect between January 2020 and January 2024 after a ballot (referendum) in November 2018.

Similarly, the EU Slaughter Regulation entered into force in less than 4 years (January 2013) after it was adopted in 2009.¹⁸⁷

A similar transition period is recommended for producers exporting to the UK. To aid with the transition, it is recommended that the UK establish knowledge exchange with affected trade partners.



PIG IN A SOW STALL IN CANADA (2022) © JO-ANNE MCARTHUR / WE ANIMALS MEDIA

Looking Ahead

Every year, billions of farmed animals globally continue to be confined in intensive, industrial-scale facilities, where they are subjected to inhumane practices - and trade plays a key part in exacerbating this situation. When a country increases their standards but doesn't require imports to meet those same standards, it can simply result in production shifting overseas, undermining the policy and legislative intent of better welfare - and the public will that demanded it.

Already a significant proportion of animal products sold in the UK are imported from countries with lower animal welfare regulations, produced using methods that would be illegal on British soil. Trade deals the UK has negotiated involve tariff reductions over a period of at least 10 years, mean that the true impact may not be seen for some time. As the UK prioritises new trade agreements with the US, India, and other agricultural powerhouses, this situation could become significantly worse.

To address this and respect the values of citizens, to safeguard higher welfare UK farmers, and to avoid simply offshoring cruelty, **the Government must ensure that animal products imported into the UK comply with or are equivalent to UK animal welfare standards.**

The UK could achieve stronger welfare standards by amending current legislation to cover imported products, while providing trade partners reasonable time to adapt.

Legal precedents suggest this approach would comply with WTO rules, particularly under public morals and non-discrimination principles, provided the UK follows WTO guidance when implementing these domestic measures.

By ensuring that the UK's commitment to animal welfare extends to products sold in the UK, regardless of origin, the Government can create a fairer, more consistent approach that reflects British values and supports higher-welfare farming practices globally.



AN EGG-LAYING HEN IN A BATTERY CAGE IN INDIA (2023)
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