

The background of the page is a solid red color. In the upper left, there is a white triangular shape pointing downwards. Overlaid on the red background are two dark red silhouettes: a large horse on the left and a smaller monkey on the right. The text is positioned in the lower right area of the page.

**Analysis of animal welfare
standards for animal
products imported to the EU**

Policy Briefing
January 2023

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Introduction

This document reviews the animal welfare standards in the top countries exporting animal products to the EU. It also reviews the standards in countries with which the EU is negotiating a trade agreement (FTA), as these are likely to export increased quantities of animal-based products to the EU in future, and including animal welfare based conditions in trade agreements is an exception.

Applying EU animal welfare standards to imported animal products would consistently offer to EU consumers the type of products they ethically feel more comfortable with, and would ensure that European consumption does not fuel inhumane and unsustainable models of production beyond the EU's borders. The revision of the EU's animal welfare legislation is a unique opportunity for the EU to lead the global transition towards sustainable food systems. The animal welfare requirements that are mostly considered are the following: ban of cages, stocking density and space allowance, mutilations, enrichment, and male chick culling.

In most cases EU imports are relatively small so requiring EU animal welfare standards will not have a major impact on exporting countries as only a small proportion of their exports go to the EU market. Yet, while only exporters from partner countries targeting the EU market would have to comply with EU rules, the measure could also have a trickle down effect on companies that supply the local market.

As shown in the table below, most of the countries exporting to the EU have poor or lower animal welfare standards compared to the EU's (*i.e.* countries in red), and only few have similar standards (*i.e.* countries in green).

The table also shows that the top exporting countries are mainly developed countries (*i.e.* United Kingdom, Norway, New Zealand, Switzerland, and the US), or middle income countries (Brazil, Argentina, China, and Ukraine). Imposing animal welfare requirements standards on imported products regardless of their origin should thus have a limited impact on developing and low income countries as they are not key exporters to the EU.

Meat products

Product	Top 5 exporters	1	2	3	4	5
Beef products & bovine skins		UK	Brazil	Argentina	Uruguay	USA
Pig meat & fat		UK	China	Norway	Chile	South Korea
Goat & sheep		UK	New Zealand	Australia	North Macedonia	Argentina

Horse meat	Argentina	Uruguay	Canada	Iceland	Australia
Poultry ¹	UK	Brazil	Ukraine	Thailand	Switzerland
Other meats (e.g. rabbit, frogs' legs)	New Zealand	China	UK	Indonesia	Argentina

Farmed fish products

Product	Top 5 exporters	1	2	3	4	5
Salmon		Norway	Iceland	UK	Faroese	Chile
Shrimp		Ecuador	India	Vietnam	Venezuela	Bangladesh
Sea bream		Turkey	Albania	Egypt	Morocco	UK
Catfish		Vietnam	Russia	UK	Ukraine	Kazakhstan
Trout		Norway	Turkey	Albania	UK	Bosnia & Herzegovina
Seabass		Turkey	Egypt	UK	Albania	Morocco
Tilapia		China	Vietnam	Indonesia	India	Thailand

Byproducts

Product	Top 5 exporters	1	2	3	4	5
Wool & wool fat		New Zealand	Australia	UK	China	Argentina

Dairy and egg/egg products

Product	Top 5 exporters	1	2	3	4	5
Dairy		UK	Switzerland	Bosnia & Herzegovina	Norway	US
Egg & egg products		US	Ukraine	China	US	North Macedonia

¹ HS code 0207 and 0210
29 Rue Ducale, 1000 Brussels, Belgium
Tel : +32 (0)2 740 08 20
eurogroupforanimals.org
info@eurogroupforanimals.org

I. Broilers

Half of the poultry imported into the EU in 2021 originated in the UK (245 673 044 kg). The other four main exporters were Brazil (160 352 334 kg), Ukraine (74 823 796 kg), Thailand (56 890 526 kg), and Switzerland (3 523 600 kg).²

In most cases, the EU is a relatively small market destination for exports of poultry products originating in key partner countries. For instance, for 2020:

- Brazil's main export market was China (23%), followed by Saudi Arabia (12%) and Japan (12%). The EU's market accounted only for approximately 1.7% of Brazilian exports³.
- Thailand's main export markets were China (39%) and Japan (37%). Malaysia was the third market destination with 9% of exports, while exports to the EU only accounted for 0.7% of Thailand's poultry exports⁴.
- Ukraine's first export market was Saudi Arabia (24%), and the EU was second with 23% of exports. However, the trade picture is changing following the Russian war of aggression, and the EU's [regulation](#) allowing for temporary full trade liberalisation for one year. Indeed according to preliminary statistics from Eurostat, poultry products are being imported at a higher rate than previous years, with 85 614 500 kg up to September 2022⁵.

Even if the EU is a relatively small market for key trading partners - except for Ukraine, which should align with EU animal welfare standards in application of the EU-Ukraine DCFTA and in view of its accession to the EU - exporters targeting the EU market would have to comply with EU rules. The measure could then have a trickle down effect on companies that supply the local market.

Broiler welfare standards that should be required for imports

The revision of the animal welfare legislation should be the opportunity to require imports to comply with EU animal welfare standards, which should now be based on the [European Chicken commitment](#),⁶ already supported by [570 companies](#) across the globe.⁷ These standards are:

- Stocking density (30kg/m² or less)
- Improved environmental standards:
 - At least 50 lux of light, including natural light.

² <https://trade.ec.europa.eu/access-to-markets/en/statistics>

³ https://oec.world/en/visualize/tree_map/hs92/export/bra/show/10207/2020/

⁴ https://oec.world/en/visualize/tree_map/hs92/export/tha/show/10207/2020/

⁵ <https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/2b349d40-10e7-47b8-8c53-c471451529ed/details?download=true>

⁶ <https://welfarecommitments.com/europeletter/>

⁷ <https://thehumaneleague.org/article/owa-3000-commitments>

- At least two metres of usable perch space, and two pecking substrates, per 1,000 birds.
- On air quality, the maximum requirements of Annex 2.3 of the EU broiler directive, regardless of stocking density.
- No cages or multi-tier systems.
- Higher welfare breeds:
 - Hubbard Redbro for indoor use only.
 - Hubbard Norfolk Black, JA757, JACY57, 787, 957, or 987, Rambler Ranger, Ranger Classic, and Ranger Gold, or other breeds that meet the criteria of the RSPCA Broiler Breed Welfare Assessment Protocol.
- Controlled atmospheric stunning (instead of waterbath stunning) using inert gas or multi-phase systems, or effective electrical stunning without live inversion.

Broiler welfare issues in key exporting countries

It is worth noting that two of the main exporters - the UK and Switzerland - already have EU equivalent animal welfare standards, and Ukraine, which is the third source of supply, should align with EU animal welfare standards in application of the EU-Ukraine DCFTA and in view of its accession to the EU.

However, the other three main exporters have poor or lower animal welfare standards compared to the EU's.

- **Brazil**⁸ on-farm welfare standards in the Brazilian chicken sector are not regulated by legislation, and instead APBA - the body representing the animal protein sector and producers in Brazil - establishes general recommendations to follow basic welfare standards. However, according to local animal welfare organisations, ABPA often prevents any improvement on welfare in the sector. For instance, on stocking density, animal welfare specialists, both organisations and certifiers reached an agreement for a maximum density of 30 kg/ m², but ABPA, on the other hand, recommended a maximum stocking density of 39kg/m², and it is common for some Brazilian farms to apply a density of up to 42kg/m². Concerning the environmental standards, recent reports underlined that many Brazilian producers have started to replace the open barns (with curtains) systems to closed barns, with air conditioning systems, in order to better control the temperature and the light. By 2020 in Paraná, which is the Brazilian state with the largest chicken production, almost 30% of the farms have already converted to a “dark house” system.
- **Ukraine**⁹ lacks specific welfare requirements for the rearing of farm animals during rearing, transport and slaughter and there are no regular inspections on farms or slaughter

⁸ Eurogroup For Animals. (2020) Mercosur: Animal Protection in EU Trade Negotiations. Available at: <https://www.eurogroupforanimals.org/library/briefing-mercotur-animal-protection-eu-trade-negotiations>

⁹ Eurogroup For Animals. (2021) Animal Welfare in the implementation of the EU-Ukraine DCFTA. Available at: <https://www.eurogroupforanimals.org/library/animal-welfare-implementation-eu-ukraine-dcfta>

establishments. Furthermore, Ukraine should have aligned with EU animal welfare standards in application of the EU-Ukraine DCFTA, but it was only in February 2021 that the government adopted a ministerial order to approximate EU animal welfare legislation on laying hen, broiler chicken, calf and pig welfare, and the legislation has several weaknesses and has not been implemented. As poultry meat production is becoming an export-oriented sector in Ukraine, and the EU represents 28% of Ukrainian poultry exports,¹⁰ the EU has the leverage to influence positive change in Ukraine, which is consistent with Ukraine's likely future accession to the EU.

- **Thailand**¹¹ has no binding guidelines on the conditions of rearing, transport and slaughter for various species of farm animals. For instance farm animal mutilations are allowed and farm animals have no legal protection at slaughter. The majority of the 60 million laying hens in Thailand are kept in battery cages, which are banned in the EU and are considered one of the cruellest practices in animal agriculture.

II. Laying hens

In 2021, the overwhelming majority of imported egg and egg products came from the UK (22 794 815 kg). The other main countries of origin were Ukraine (4 619 727 kg), China (1 914 747 kg), the US (756 060 kg), and North Macedonia (452 922 kg).¹²

- Ukraine exported €114 million worth of eggs and egg products in 2020, primarily to the United Arab Emirates (9%), Saudi Arabia (8%) and Latvia (7%). The EU market accounted for approximately 10.5% of exports, with €12m worth of imports. However, in application of the EU's regulation allowing for temporary full trade liberalisation for one year. Indeed according to preliminary statistics from Eurostat, egg products are being imported at a much higher rate than previous years, with 11 707 900 up to September 2022.

Laying hen welfare standards that should be required for imports

The shift in European consumption of egg and egg products has shown that the welfare of laying hens is a concern for European consumers and citizens. The EU should improve their standards, both for EU and imported products, hence avoiding externalising concerns that would be phased out in the EU.

¹⁰ <https://www.poultryworld.net/poultry/ukraine-partially-resumes-poultry-exports-to-eu/>

¹¹ <https://api.worldanimalprotection.org/country/thailand>

¹² <https://trade.ec.europa.eu/access-to-markets/en/statistics>

These standards should be those detailed in the [Hens' Asks](#),¹³ which include:

- Cage-free systems
- Ban on male chick culling
- Stocking density not exceeding 7 hens/m²
- Enrichment (details listed in the Hens' Ask)
- Ban on mutilations (beak trimming)
- Controlled atmospheric stunning (instead of waterbath stunning) using inert gas or multi-phase systems, or effective electrical stunning without live inversion.

The opportunity to apply cage-free standards regardless of the origin of the product would be supported by [2,640 companies](#) across the globe that have already committed to go cage-free,¹⁴ including [Latin American](#) companies.¹⁵ Global companies member of the [Global Coalition for Animal Welfare \(GCAW\)](#) such as Unilever, Tesco and Nestlé, have also committed not only to go cage-free,¹⁶ but also to [not install systems that are not fit for purpose](#) and fit for the future like combination systems which can have the same negative impacts on laying hen welfare as caged production systems.¹⁷

Laying hen welfare issues in key exporting countries

It is worth noting that from the top 5 exporting countries of egg and egg products, the UK already has EU equivalent animal welfare standards and the remaining four key countries are either candidates for accession to the EU - meaning they should in the future align with EU animal welfare standards - or are developed countries.

- **Ukraine:**¹⁸ In addition to the poor animal welfare requirements mentioned above, it must be noted that Ukrainian farm production uses some of the most extreme animal confinement systems, including [battery cages](#) for laying hens. In 2020, the vast majority of egg production was caged (95.5%), with only 4.5% providing outdoor access. By comparison, the European laying hen sector is 49.5% enriched cages, 32.5% barn and 19% outdoor access.
- **China**¹⁹ uses many farming methods eliminated or reduced in the EU, including [battery cages](#) and [clipping of beaks](#). China lacks a stand-alone animal welfare legislation recognising animal sentience or laying out detailed welfare requirements for various species. There is no

¹³ Eurogroup For Animals. (2022) *The Hens' Asks*. Available at: <https://www.eurogroupforanimals.org/library/hens-asks>

¹⁴ <https://thehumaneleague.org/article/owa-3000-commitments>

¹⁵ <https://www.cagefreetracker.com/latam>

¹⁶ <https://www.gc-animalwelfare.org/about-us/>

¹⁷ <https://www.gc-animalwelfare.org/2021/07/06/gcaw-position-on-combination-systems/>

¹⁸ Eurogroup For Animals. 2021. Animal Welfare in the implementation of the EU-Ukraine DCFTA. Available at: <https://www.eurogroupforanimals.org/library/animal-welfare-implementation-eu-ukraine-dcfta>

¹⁹ Eurogroup For Animals. 2020. What could the European Union and China achieve for animals? <https://www.eurogroupforanimals.org/library/briefing-china-what-could-european-union-and-china-achieve-animals>

national legislation requiring the stunning of animals prior to slaughter for all farm animals and humane slaughter is only required for pigs, and in Shandong, for poultry. The few pieces of legislation on animal welfare concern the Husbandry Law which contains minimal welfare requirements mandating that livestock and poultry farms provide suitable conditions for the breeding, survival and growth of animals.

- **US:**²⁰ The USA lacks important federal protection for animals. In most States, farm animals are confined in battery cages, farrowing crates, and sow stalls; surgical operations, such as beak trimming for egg-laying hens, are performed without anaesthesia or pain relief. Furthermore, the “ag-gag” rules, currently implemented in six states, prevent the recording of farm animal operations, specifically the recording of any animal abuses on farms and the US legislation still allows the slaughter of non-stunned animals. Finally, the Animal Welfare Act does not apply to farm animals, and the Humane Slaughter Act does not apply to poultry or fish.

III. Pigs

In 2021, the overwhelming majority of pig meat imported to the EU came from the UK (87 896 921 kg). The other main countries of origin were Norway (3 470 424 kg), China (2 749 963 kg), Chile (1 773 644 kg), and South Korea (546 620 kg).²¹

- The UK exported €513 million worth of pig meat in 2020, primarily to China (46%), Ireland (18%) and Germany (8%). The EU market accounted for approximately 46% of exports, with €236m worth of imports.²²
- China exported €81 million worth of pig meat in 2020, primarily to Hong Kong and Macau. The EU market accounted for approximately 5% of exports, with €3.4m worth of imports.²³

Pig welfare standards that should be required for imports

Imposing pig welfare standards to imports would be supported by [some companies](#) that have committed to higher welfare pork production in China, one of the main trading partners.

These standards should be:

- Cage-free
- Lower stocking densities
- Ban on mutilations,

²⁰ <https://api.worldanimalprotection.org/country/usa>

²¹ <https://trade.ec.europa.eu/access-to-markets/en/statistics>

²² https://oec.world/en/visualize/tree_map/hs92/export/gbr/all/show/2020/

²³ https://oec.world/en/visualize/tree_map/hs92/export/chn/all/show/2020/

- Provisions of enrichment.

Pig welfare issues in key exporting countries

It is worth noting that over 94% of imports of pig meat already comply with EU's animal welfare standards as the main country of origin is the UK. The remaining countries are developed countries, hence applying animal welfare standards to imports should not impact developing or low income countries.

- **China:**²⁴ In addition to the poor animal welfare requirements mentioned above, pig welfare issues concern gestation crates and clipping of ears and tail slacks. Imposing EU animal welfare standards could incentivize producers to incorporate animal welfare in their production as in 2016 a survey found two thirds of Chinese shoppers would pay more for higher welfare pork. In 2017, one of the country's largest agricultural producers, Da Bei Nong, agreed to improve the quality of life for its millions of pigs through increased roaming space and better flooring.
- **Chile:**²⁵ there is no species-specific legislation on pig welfare and most pregnant sows are kept in gestation crates, the size of which is similar to those used in the US (2m X 60cm). In comparison, the EU requires 2.25m² in group housing. Furthermore, there is no requirement for enrichment and almost all pigs are tail-docked.

IV. Beef

In 2021, over half of beef imports to the EU originated in the UK (108 760 516 kg), and the next trading partners were Mercosur countries - Brazil (53 521 313 kg), Argentina (49 598 722 kg), Uruguay (33 513 506 kg). The fifth trading partner was the US (16 693 221 kg).

- Brazil exported €7.06 billion worth of beef products in 2020, primarily to China (52%), Hong Kong (10.5%) and Egypt (5.6%). The EU market accounted for approximately 4.4% of exports, with €310 million worth of imports.
- Argentina exported €2.75b worth of beef in 2020, primarily to China (63%), Germany (7%) and Chile (7%). The EU accounted for 16% of exports, with €358m worth of imports.

²⁴ Eurogroup For Animals. 2020. What could the European Union and China achieve for animals? <https://www.eurogroupforanimals.org/library/briefing-china-what-could-european-union-and-china-achieve-animals>

²⁵ Eurogroup For Animals. 2021. Briefing: Chile- Animal Protection in EU Trade Negotiations. Available at: <https://www.eurogroupforanimals.org/library/briefing-chile-animal-protection-eu-trade-negotiations>

29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

[eurogroupforanimals.org](https://www.eurogroupforanimals.org)

info@eurogroupforanimals.org

Even if the EU is a relatively small market for key trading partners, exporters from Brazil and Argentina targeting the EU market would have to comply with EU rules, and the measure could then have a trickle down effect on other local companies supplying other markets.

Imposing animal welfare standards for beef, in particular conditions on grass-fed animals, hence explicitly excluding feedlots, is of most importance as all the trading partners - except the UK - have or are increasingly developing feedlots. The EU quota on “hormone free beef” has contributed to spreading feedlots to countries that used to have only grass-fed cattle such as Uruguay and Argentina. Indeed the legislation opening the quota requires a condition that the beef is produced using a specific method of production that demands a grain diet, which implies the use of feedlots.

Confining cattle on feedlots and feeding them highly concentrated grain diets adversely impacts animal health and welfare, as well as harming the environment and threatening public health²⁶. Cattle finished on feedlots disproportionately suffer from respiratory diseases, the number one cause of mortality in these systems, followed by digestive problems, calving, and death resulting from extreme weather conditions.

V. Farmed fish products

Trading partners of farmed fish products greatly depend on the species. However, in 2021, nearly 65% of imported fish products consisted of salmon, and Norway accounted for 87% of imports of salmon, followed by the UK (8%), Faroes (3%) and Iceland (2.3%) and Chile (1%). Norway exported €5.46 billion worth of salmon products in 2020, primarily to EU countries which accounted for approximately 81% of the export market.²⁷ The second main product imported was shrimp (21%), and the main exporters were Ecuador (51%), India (11.5%), Vietnam (11.1%), Venezuela (9%) and Bangladesh (6.5%).

Aquaculture standards that should be required for imports

The standards that should be required for aquaculture are detailed in Eurogroup for Animals’ [Transport white paper](#),²⁸ and in its [annex on aquaculture](#).²⁹

The revision of the animal welfare legislation, combined with the Commission’s 2021 Inception Impact Assessment to introduce species-specific requirements for farmed fish is the opportunity to

²⁶ <https://www.eurogroupforanimals.org/library/welfare-cattle-finished-feedlots>

²⁷ https://oec.world/en/visualize/tree_map/hs92/export/nor/all/show/2020/

²⁸ <https://www.eurogroupforanimals.org/library/animal-welfare-during-transport>

²⁹ https://www.eurogroupforanimals.org/files/eurogroupforanimals/2022-07/NALB%20Annex%20-%20On-farm%20Welfare%20Standards%20in%20Aquaculture_1.pdf

29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

eurogroupforanimals.org

info@eurogroupforanimals.org

impose on-farm welfare standards in EU aquaculture and on imports. These standards concern requirements on nutrition, physical environment, health, behavioural interactions and mental experiences. In terms of slaughter, effective stunning and best handling practices should be required. Finally, the EU should take the opportunity of the new and revised animal welfare legislation to ban animal products from cephalopod farming regardless of the origin.

Aquaculture standards and issues in key exporting countries

Imposing EU standards on imported aquaculture products should be supported by key exporting partners which already have extensive legislation. For instance Norway - first exporter of salmon and trout - has quite extensive [fish welfare legislation](#) including transport, different aspects of handling and husbandry, maximum stocking densities, and pre-slaughter stunning. Ecuador, which is the EU's first exporter of shrimp, is currently considering a new animal welfare regulation including ambitious elements on aquatic animal welfare for fish, shrimp & cephalopods.

- **Chile** has regulated species-specific stocking densities for salmon and trout, but fish-welfare issues exist across the life-stages of the important species and in a range of production systems.³⁰
 - High mortality rates in hatcheries reflect poor breeding, environments or handling and high stress for the fish.
 - Breeding programmes have led to all farmed Atlantic salmon being deaf.
 - All of the aquaculture systems are barren environments that fail to meet the behavioural needs of the fish.
 - The percussive stunning equipment that is used in the sector is of limited efficacy and used in only some slaughter facilities.
 - The Chilean salmon industry has many negative impacts on the environment. This sector can generate eutrophication as well due to the pollution of water by food waste from farms.
 - Chilean aquaculture is also characterised by a high use of antibiotics, especially for salmon

- **Vietnamese aquaculture**³¹ suffers from serious welfare concerns, including exceptionally high stocking densities and poor handling/transport practices. The industry is increasingly vertically integrated, with 75% of producers operating on farms of less than 3 hectares in size. These systems tend to be more intensive and pose welfare challenges, including a lack of monitoring of environmental conditions. Many shrimps reared in aquaculture also suffer

³⁰ Eurogroup For Animals. 2021. Briefing: Chile- Animal Protection in EU Trade Negotiations. Available at: <https://www.eurogroupforanimals.org/library/briefing-chile-animal-protection-eu-trade-negotiations>

³¹ Eurogroup For Animals. 2022. Briefing: Animal welfare in the implementation of the EU-Vietnam FTA.

Available:

<https://www.eurogroupforanimals.org/library/briefing-vietnam-animal-welfare-implementation-eu-vietnam-fta>

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29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

[eurogroupforanimals.org](https://www.eurogroupforanimals.org)

info@eurogroupforanimals.org

from low welfare practices. Poor water quality (*e.g.* oxygen, temperature, pH) compromises the immunity of shrimps and high stocking densities increase disease risk and lead to antibiotic overuse. The heavy use of antibiotics means the aquaculture sector has a serious environmental impact.

- **In India**³² several inhumane practices have been identified in the fisheries and aquaculture industries.
 - Fish and other aquatic animals are not stunned before slaughter. They are killed using methods such as live chilling; asphyxiation in air or on ice; gill-cutting without prior stunning; and allowing the fish to bleed to death.
 - Transport conditions are also non-satisfactory as fish that are transported suffer from overcrowding, lack of oxygen in the water and as a result of constant movement during a prolonged period in an environment with noise and vibrations that can become significant stressors.
 - Alongside limited capacity to control the water quality in the transported tanks, there is little to no veterinary care at the farms.
 - The unregulated use of antibiotics in the aquaculture industry for the production of farm-raised fish and shrimp poses human health and food safety concerns, and is also responsible for the contamination of the environment.

³² Eurogroup For Animals. 2021. Briefing: India - Animal Protection in EU Trade Negotiations. Available at: <https://www.eurogroupforanimals.org/library/briefing-india-animal-protection-eu-trade-negotiations>
29 Rue Ducale, 1000 Brussels, Belgium
Tel : +32 (0)2 740 08 20
eurogroupforanimals.org
info@eurogroupforanimals.org

Annex

I. Top 5 exporters of animal products to the EU in 2021³³

A. Meat Products

1. Beef products/Bovine skins

- a. United Kingdom - 108,760,516 kilograms
- b. Brazil - 53,521,313 kilograms
- c. Argentina - 49,598,722 kilograms
- d. Uruguay - 33,513,506 kilograms
- e. United States - 16,693,221 kilograms

2. Pig meat/fat

- a. United Kingdom - 87,896,921 kilograms
- b. Norway - 3,470,424 kilograms
- c. China - 2,749,963 kilograms
- d. Chile - 1,773,644 Kg
- e. South Korea - 546,620 Kg

3. Goat/Sheep:

- a. United Kingdom - 64,001,412 Kg
- b. New Zealand - 40,618,157 Kg
- c. Australia - 2,948,562 Kg
- d. North Macedonia - 2,194,699 Kg
- e. Argentina - 1,035,588 Kg

4. Horse meat

- a. Argentina - 9,614,894 Kg
- b. Uruguay - 3,996,000 Kg
- c. Canada - 679,367 Kg
- d. Iceland - 262,240 Kg
- e. Australia - 152,150 Kg

5. Edible offals (except poultry)

- a. United Kingdom - 38,344,473 Kg
- b. Switzerland - 13,261,355 Kg
- c. Norway - 2,540,756 Kg
- d. New Zealand - 1,194,985 Kg
- e. China - 618,203 Kg

6. Poultry

- a. United Kingdom - 245 673 044 kilograms
- b. Brazil - 160 352 334 kilograms
- c. Ukraine - 74 823 796 kilograms
- d. Thailand - 56 890 526 kilograms

³³ <https://trade.ec.europa.eu/access-to-markets/en/statistics>
29 Rue Ducale, 1000 Brussels, Belgium
Tel : +32 (0)2 740 08 20
eurogroupforanimals.org
info@eurogroupforanimals.org

e. Switzerland - 3 423 600 kilograms

7. Other meats and offals (rabbits, frogs' legs, game, etc) in CN 0208

- a. New Zealand - 7,213,602 Kg
- b. China - 3,533,590 Kg
- c. United Kingdom - 1,907,850 Kg
- d. Indonesia - 1,354,425 Kg
- e. Argentina - 831,011 Kg

B. Farmed fish products

1. Salmon

- a. Norway - 783 933 532 kg
- b. United Kingdom - 68 806 526 kg
- c. Faroes - 27 142 242 kg
- d. Iceland - 21,144,118 Kg
- e. Chile - 1,938,082 Kg

2. Shrimp

- a. Ecuador - 144,736,075 Kg
- b. India - 32,265,947 Kg
- c. Vietnam - 31,346,288 Kg
- d. Venezuela - 27,894,839 Kg
- e. Bangladesh - 18,345,905 Kg

3. Sea bream

- a. Turkey - 41,243,589 Kg
- b. Albania - 2,547,769 Kg
- c. Egypt - 129,141 Kg
- d. Morocco - 106,057 Kg
- e. United Kingdom - 12,607 Kg

4. Catfish

- a. Vietnam - 39,671,999 Kg
- b. Russia - 69,440 Kg
- c. United Kingdom - 17,978 Kg
- d. Ukraine - 16,964 Kg
- e. Kazakhstan - 3,284 Kg

5. Trout

- a. Norway - 8 692 169 kg
- b. Turkey - 7 005 676 kg
- c. Albania - 1 069 589 kg
- d. UK - 752 422 kg
- e. Bosnia and Herzegovina - 357,268 Kg

6. Seabass

- a. Turkey - 20,235,835 Kg

- b. Egypt - 322,579 Kg
- c. United Kingdom - 311,469 Kg
- d. Albania - 30,017 Kg
- e. Morocco - 6,598 Kg

7. Tilapia

- a. China - 16 638 932 kg
- b. Vietnam - 2 028 972 kg
- c. Indonesia - 1 306 458 kg
- d. India - 154,870 kg
- e. Thailand - 145 304 kg

C. Byproducts

1. Bovine/sheep/goat fat

- a. Uruguay - 58,398,617 Kg
- b. Argentina - 28,692,707 Kg
- c. United Kingdom - 21,513,565 Kg
- d. Serbia - 1,800,260 Kg
- e. Ukraine - 1,762,860 Kg

2. Wool

- a. New Zealand - 26,474,151 Kg
- b. Australia - 23,880,650 Kg
- c. United Kingdom - 20,493,520 Kg
- d. China - 18,057,147 Kg
- e. Argentina - 10,526,474 Kg

D. Egg/Dairy products

1. Dairy Products

- a. United Kingdom - 884,157,855 kg
- b. Switzerland - 105,452,830 kg
- c. Bosnia and Herzegovina - 14,860,770 kg
- d. Norway - 13,754,968 kg
- e. United States - 7,360,746 kg

2. Eggs/Egg Products

- a. United Kingdom - 22,794,815 kilograms
- b. Ukraine - 4,619,727 kilograms
- c. China - 1,914,747 kilograms
- d. United States - 756,060 Kg
- e. North Macedonia - 452,922 Kg

II. Animal welfare issues in key exporting countries

1. Brazil

Brazil is a top 5 exporter to the EU of beef, poultry, raw hides and skins. The negotiated FTA between the EU and Mercosur lacks any animal welfare condition for most products - except for shelled eggs. This unconditional liberalisation will intensify the quantity of low welfare products imported by the EU from Brazil, especially beef and poultry.

Farm Welfare Issues³⁴

- Brazil lacks harmonised federal legislation for different species of farm animals, detailing the conditions in which they must be reared.
- Regular inspections, with a special focus on animal welfare, are not carried out.
- The worst forms of confinement, such as sow stalls and farrowing crates for pigs and battery cages for laying hens, are not prohibited by legislation.
- Good Practice Guidelines are not sufficient compared with legislation.
- The humane slaughter of all farm animals is not mandated. An estimated 8 billion animals are cruelly killed annually in Brazilian facilities that violate slaughter rules.
- The rules cannot ensure that non-compliant facilities will be quickly removed from the list of establishments allowed to export to the EU.
- While the minimum standards for the live transport of ruminants destined for live exports require OIE guidelines, inadequate resources make enforcement impossible.

Opportunities to apply animal welfare standards to imports from Brazil

- 81% of Brazilians perceive farm animal welfare to be important.³⁵
- There are private initiatives to improve farm welfare: In 2014, BRF - Brazil's largest pork producer - committed to phasing out the continuous use of gestation crates by 2026.³⁶

2. Argentina

Argentina is a top 5 exporter to the EU of beef, goat and sheep meat, horse meat, bovine/sheep/goat fat and wool. The negotiated FTA between the EU and Mercosur - in the absence of relevant animal welfare conditions for most products - will intensify the quantity of low welfare products imported by the EU.

³⁴ Eurogroup For Animals. 2020. Briefing: Mercosur - Animal Protection in EU Trade Negotiations. p. 9. Available at: <https://www.eurogroupforanimals.org/library/briefing-mercotur-animal-protection-eu-trade-negotiations>

³⁵ Ibid

³⁶ Ibid

Farm Welfare Issues³⁷

- Argentina has no legally binding, species-specific welfare requirements for farm animals.
- Regular inspections of farms and slaughter establishments are not carried out.
- Argentina uses the worst forms of confinement for farm animals, including battery cages, sow stalls, farrowing crates and veal crates.
- Debeaking, de-toeing, tail-docking, tooth pulling, castration, and dehorning of livestock without anaesthetic are legal.
- Surgical operations, such as piglet mutilations and beak trimming for egg-laying hens, are performed without anaesthesia or pain relief.
- The humane slaughter of all farm animals is not mandated.
- Legislation regarding the transport of animals does not protect their Five Freedoms.
- A lack of monitoring resources makes enforcement of transport/slaughter rules difficult.
- A 2016 EU audit of the beef sector found weaknesses in slaughterhouses that compromise the guarantees concerning their proper implementation in the EU-listed establishments.

Opportunities to apply animal welfare standards to imports from Argentina

- Havana, the leading Argentinean manufacturer of “alfajores”, chocolates and other products recently announced that it is joining the global cage-free egg movement, committing to switch to a 100 percent cage-free egg supply chain.³⁸

3. United States

The US is a top 5 exporter to the EU of beef, raw hides and skins, milk/cream, eggs and butter.

Farm Welfare Issues³⁹

- The USA lacks important federal protection for animals: the Animal Welfare Act does not apply to farm animals, and the Humane Slaughter Act does not apply to poultry or fish, and the EU imports large amounts of fish products from the US.
- Farm animals are confined in farrowing crates, sow stalls and battery cages.
- Surgical operations, such as piglet mutilations and beak trimming for egg-laying hens, are performed without anaesthesia or pain relief.
- “Ag-gag” rules, currently implemented in six states, prevent the recording of farm animal operations, specifically the recording of any animal abuses on farms.
- US legislation still allows the slaughter of non-stunned animals.
- While beef imports to the EU are hormone free, most cattle producers in the US implant their cattle with growth promoting hormones to improve production efficiency + feedlots.

³⁷ <https://api.worldanimalprotection.org/country/argentina>

³⁸ <https://www.hsi.org/news-media/havanna-cage-free-061218/>

³⁹ <https://api.worldanimalprotection.org/country/usa>

Opportunities to apply animal welfare standards to imports from the US

- California's Proposition 12, which took effect in 2022, is one of the most progressive pieces of animal welfare legislation in the world. It sets specific minimum space requirements for animals raised for food, effectively banning cages for laying hens, sow stalls, and crates for calves. Crucially, it also bans imports of products raised in these conditions. The legality of the legislation is pending before the Supreme Court, with a decision expected by June 2023.⁴⁰
- In 2019, Michigan passed Senate Bill 0174, which mandates cage-free conditions for egg-laying hens and prohibits the sale of non-cage-free eggs by December 2024.⁴¹
- Various States have already banned sow stalls, battery cages, veal crates, and other practices that have adverse effects on animals.
- Private standards on animal welfare have been adopted by thousands of national and local businesses.

4. China

China is a top 5 exporter to the EU of pig meat, tilapia, egg products, wool, and offals.

Farm Welfare Issues⁴²

- China uses many farming methods eliminated/reduced in all or part of the EU, including gestation crates, battery cages, force feeding, early weaning of cows, and clipping of ears/beaks/tails.
- There is no stand-alone animal welfare legislation, recognising animal sentience and laying out detailed welfare requirements for various species, in line with the OIE standards.
- The Husbandry Law contains minimal welfare requirements, mandating that livestock and poultry farms provide suitable conditions for the breeding, survival and growth of animals.
- Animal welfare is not formally part of the remit of any Ministry in China. But the Ministry of Agriculture has produced non-binding guidelines referring to animal welfare.
- There is no national legislation requiring the stunning of animals prior to slaughter for all farm animals. Humane slaughter is legally required for pigs and, in Shandong, for poultry.

⁴⁰<https://www.vox.com/future-perfect/22576044/prop-12-california-eggs-pork-bacon-veal-animal-welfare-law-gestation-crates-battery-cages>

⁴¹<https://www.mlive.com/news/2019/11/eggs-sold-in-michigan-will-be-cage-free-by-the-end-of-2024.html>

⁴² Eurogroup For Animals. 2020. What could the European Union and China achieve for animals? pp. 9. <https://www.eurogroupforanimals.org/library/briefing-china-what-could-european-union-and-china-achieve-animals>

Opportunities to apply animal welfare standards to imports from China

- In 2017, one of the country's largest agricultural producers, Da Bei Nong, agreed to improve the quality of life for its millions of pigs through increased roaming space and better flooring.⁴³
- A 2016 survey found two thirds of Chinese shoppers would pay more for higher welfare pork.⁴⁴
- Some conferences on animal welfare are attended by hundreds of people, including government officials and industry representatives.⁴⁵

5. Ukraine

Ukraine is a top 5 exporter to the EU of poultry, egg products, catfish, pig fat, bovine/sheep/goat fat, milk and cream.

Farm Welfare Issues⁴⁶

- Ukrainian farm production uses some of the most extreme animal confinement systems, including battery cages for laying hens, farrowing crates and sow stalls.
- There are no specific welfare requirements for the rearing of farm animals during rearing, transport and slaughter.
- Surgical operations, such as piglet mutilations and beak trimming for egg laying hens, are performed without anaesthesia or pain relief.
- There are no regular inspections on farms or slaughter establishments.
- 95.5% of egg production in 2020 was caged, with only 4.5% providing outdoor access. By comparison, the European laying hen sector is 49.5% enriched cages, 32.5% barn and 19% outdoor access.

Opportunities to apply animal welfare standards to imports from Ukraine

- Leading producers of poultry products, such as MHP and Ovostar, claim to already comply with EU standards. Although recent investigations cast doubt on the veracity of these claims.⁴⁷
- There is an interest among Ukrainian consumers in more ethical and sustainable production practices. In 2017 a study by Open Cages and the Kyiv International Institute of Sociology found that 65% of Ukrainians consider animal welfare important when it comes to

⁴³<https://www.worldanimalprotection.org/news/millions-pigs-china-set-have-better-lives-while-support-grows-brazil-and-chile>

⁴⁴<https://www.worldanimalprotection.org/news/pigs-welfare-top-agenda-animal-welfare-charity-china-and-latin-america#:~:text=A%202016%20survey%20by%20World,that%20have%20lived%20better%20lives.>

⁴⁵ <https://www.poultryworld.net/health-nutrition/chinese-minister-speaks-out-for-animal-welfare/>

⁴⁶ Eurogroup For Animals. 2021. Animal Welfare in the implementation of the EU-Ukraine DCFTA. pp.10 Available at: <https://www.eurogroupforanimals.org/library/animal-welfare-implementation-eu-ukraine-dcfta>

⁴⁷<https://www.kyivpost.com/business/undercover-footage-reveals-shocking-conditions-for-hens-in-ukrainian-egg-factory.html>

purchasing animal products, and 50% think that battery cages are not appropriate. In the same year, 22% of people considered paying extra money for ethical products, and in 2019 a similar study found that 68% of consumers were willing to pay extra for cage-free eggs.

6. India

India is a top 5 exporter to the EU of tilapia and shrimp. In the absence of animal welfare standards applied to imports, the implementation of a future FTA will likely intensify the quantity of lower welfare animal products imported by the EU.

Farm Welfare Issues⁴⁸

- India has not banned the worst forms of confinement for farm animals, including the use of farrowing crates, sow stalls, and battery cages.
- There are no guidelines and legislation on detailed husbandry issues for different species of farmed animals to promote the Five Freedoms of farm animals at all times.
- The Prevention of Cruelty to Animals Act 1960 exempts mutilations such as dehorning, castration and nose roping from being considered cruel. Surgical operations, such as piglet mutilations, teeth clipping, and beak trimming are done without anaesthesia or pain relief.
- While rules mandate that animals shall be inspected by a veterinarian prior to slaughter, and that no animals shall be slaughtered in sight of another animal, India has not mandated the humane slaughter of all farm animals.

Opportunities to apply animal welfare standards to imports from India

- The Animal Welfare Board of India said in 2014 that the confinement of egg-laying hens in barbed battery cages denied them all their freedoms. Following this, in 2018 the Delhi High Court stated that hens should be kept in bigger cages. However, so far this has only led to the publication of draft rules creating space allowances similar to the EU levels when battery cages were still allowed.⁴⁹
- Cage-free farming is being pioneered in India by producers such as the Happy Hens Farm and Keggfarms, headquartered in Bengaluru and Haryana.⁵⁰
- Some practices such as force-feeding for foie gras production are banned by law.

7. Vietnam

Vietnam is a top 5 exporter to the EU of shrimp, catfish and tilapia. The quantity of animal products imported by the EU is increasing due to the recent conclusion of a FTA.

⁴⁸Eurogroup For Animals. 2021. Briefing: India - Animal Protection in EU Trade Negotiations. pp. 11. Available at: <https://www.eurogroupforanimals.org/library/briefing-india-animal-protection-eu-trade-negotiations>

⁴⁹ Ibid, pp. 14

⁵⁰ <https://purecoindia.in/emerging-trend-in-egg-business-sector/>

29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

eurogroupforanimals.org

info@eurogroupforanimals.org

Farm Welfare Issues⁵¹

- Animal welfare legislation in Vietnam prioritises human health and consumption. This has resulted in vague and limited protections for animals in the country.
- The Law on Animal Husbandry is not aligned with the Five Freedoms nor the OIE animal welfare standards for the rearing, transport and slaughter of different farm animal species, including pigs, chickens, beef cattle and dairy cattle.
- The worst forms of confinement for livestock are permitted in Vietnam, including the use of farrowing crates, sow stalls and battery cages.
- The Law on Animal Health (2015) and the Law on Animal Husbandry (2018) lack enforcement mechanisms and punishments for animal cruelty.
- The humane slaughter of all farm animals is not mandated in Vietnam.

Opportunities to apply animal welfare standards to imports from Vietnam

- V.Food, a leading egg supplier, joined the global cage-free movement in 2021.⁵²
- Tesco, a leading supermarket chain operating in the EU, began an initiative in 2010 to ensure Pangasius sourced from Vietnam is humanely stunned before processing.⁵³

8. Australia

Australia is a top 5 exporter to the EU of wool, horse meat and goat/sheep meat. If animal welfare standards are not required for imports, the conclusion of a future FTA could intensify the quantity of lower welfare products imported by the EU.

Farm Welfare Issues⁵⁴

- Australia has limited legislation at the national level regarding farm animals.
- The country allows the extreme confinement of farm animals, including sow stalls, farrowing crates and battery cages.
- The National Model Codes of Practice do not prescribe that anaesthesia be used for castration, tail-docking, teeth-clipping and nose-ringing. Piglet mutilations are carried out without anaesthesia or pain relief.
- The humane slaughter of all farm animals is not mandated.
- The National Model Codes of Practice cover various species but are not legally binding. The Codes leave wide exceptions to basic animal protections, legalising cruel practices.

⁵¹Eurogroup For Animals. 2022. Briefing: Animal welfare in the implementation of the EU-Vietnam FTA. p. 9.

Available:

<https://www.eurogroupforanimals.org/library/briefing-vietnam-animal-welfare-implementation-eu-vietnam-fta>

⁵²[https://www.poultryworld.net/poultry/vietnams-first-certified-cage-free-egg-brand-launched/#:~:text=rice%20husk%20bedding-,V.,Animal%20Care%20\(HFAC\)%20standards](https://www.poultryworld.net/poultry/vietnams-first-certified-cage-free-egg-brand-launched/#:~:text=rice%20husk%20bedding-,V.,Animal%20Care%20(HFAC)%20standards).

⁵³ <https://thefishsite.com/articles/tesco-unveil-initiative-for-fish-welfare>

⁵⁴ Eurogroup For Animals. 2020. Briefing: Australia. Animal Protection in EU Trade Negotiations. pp. 8. Available at: <https://www.eurogroupforanimals.org/library/briefing-australia-animal-protection-eu-trade-negotiations>

29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

eurogroupforanimals.org

info@eurogroupforanimals.org

Opportunities to apply animal welfare standards to imports from Australia

- Australian Capital Territory banned the use of sow stalls and farrowing crates.⁵⁵
- Australian Pork Limited, a producer-owned industry body, said in 2010 that it would “commit to pursuing the voluntary phasing out of the use of sow stalls by 2017.” However, this has not yet happened.
- Many private companies have adopted animal welfare policies.

9. South Korea

South Korea is a top 5 exporter to the EU of pig meat. The quantity of pig meat imported by the EU is increasing due to the recent conclusion of a FTA.

Farm Welfare Issues⁵⁶

- Korea utilises intensive factory farming and battery cage systems.
- The humane slaughter of all farm animals is not mandated in Korea.
- 94% of poultry farms in the country use battery cages, severely restricting movement
- Acts of cruelty towards animals are not prohibited in farm animal specific legislation.

Opportunities to apply animal welfare standards to imports from South Korea

- Since 2014, the Government of Korea has made amendments to many pieces of legislation that impact animal welfare. This suggests a strong political will to ensure high animal welfare standards in the country.
- Some private companies have adopted animal welfare policies.

10. Chile

Chile is a top 5 exporter to the EU of pig meat and salmon. The modernised EU-Chile deal will grant further market access to Chilean animal products, particularly poultry, without any animal welfare condition.

Farm Welfare Issues⁵⁷

- The Agriculture and Livestock Service (SAG) has published animal welfare good practices with regards to pig production. But there are no such guidelines for other farmed species.
- The humane slaughter of all farm animals is not mandated in Chile.

⁵⁵<https://www.theguardian.com/world/2022/sep/21/pigs-still-held-in-narrow-pens-industry-promised-to-ban-victorian-animal-justice-party-claims>

⁵⁶ <https://api.worldanimalprotection.org/country/korea>

⁵⁷ Eurogroup For Animals. 2021. *Briefing: Chile- Animal Protection in EU Trade Negotiations*. pp. 14. Available at: <https://www.eurogroupforanimals.org/library/briefing-chile-animal-protection-eu-trade-negotiations>

29 Rue Ducale, 1000 Brussels, Belgium

Tel : +32 (0)2 740 08 20

eurogroupforanimals.org

info@eurogroupforanimals.org

Opportunities to apply animal welfare standards to imports from Chile

- A study published in 2020 found that 90% of Chilean consumers living in Santiago considered animal welfare as a very important issue. Another found 42% of Chilean consumers were willing to pay a premium for products that were certified to be animal welfare friendly.⁵⁸
- Cencosud, the largest multinational retail company in Chile, in 2021 announced it will sell only cage-free eggs in its own brand by 2025 and all eggs at two of its major chains by 2028.⁵⁹

11. Thailand

Thailand is a top 5 exporter to the EU of poultry products and tilapia. If animal welfare standards are not required for imports, the conclusion of a future FTA could intensify the quantity of lower welfare products imported by the EU.

Farm Welfare Issues⁶⁰

- Thailand has no legally binding guidelines on the conditions of rearing, transport and slaughter for various species of farm animals.
- The majority of the 60 million laying hens in Thailand are kept in battery cages, which is considered one of the cruellest practices in animal agriculture.
- Farm animals have no legal protection at slaughter.
- Farm animal mutilations are also allowed.

Opportunities to apply animal welfare standards to imports from Thailand

- Charoen Pokphand Foods, a large food-manufacturing organisation in Thailand, announced in 2020 it will increase production of cage-free eggs in Thailand (which amounted to 5 million in 2019, or 1% of total egg production, by 10 million each year to serve growing demand.⁶¹
- 97% of Thai consumers think that the government should increase minimum welfare standards.
- Thailand's legislation mandates the inclusion of animal welfare organisations in the highest decision-making authorities with regards to animal welfare.

⁵⁸ Ibid, p. 8

⁵⁹ Ibid, p. 19

⁶⁰ <https://api.worldanimalprotection.org/country/thailand>

⁶¹ <http://www.feedlivestock.com/cp-foods-to-achieve-20-million-cage-free-eggs-production-in-2022/>

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Eurogroup for Animals
Rue Ducale 29 – 1000 Brussels
Tel: +32 (0)2 740 08 20

info@eurogroupforanimals.org
eurogroupforanimals.org