STOP CRUEL IMPORTS!

Applying EU animal welfare standards to *all* products placed on the EU market
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INTRODUCTION

According to the most recent Eurobarometer on animal welfare, 93% of European citizens want imported animal products to respect the same animal welfare standards as those applied in the European Union (EU). The upcoming revision of the EU’s animal welfare legislation is a unique opportunity for the EU to fulfill this call. EU citizens do not want their consumption to fuel inhumane and unsustainable models of production beyond the EU’s borders. It is time for the EU to take this step, and to act as a leader in the global transition towards sustainable food systems. Imposing these standards would also be coherent with the EU’s Green Deal and Farm-to-Fork Strategy, as trade policy would stop fostering unsustainable farming practices abroad.

According to our research, introducing animal welfare-based import requirements on animal source foods would overall have a positive impact. First, as explained above, from an ethical perspective, it would ensure EU citizens’ wishes to protect animals are respected. Second, it would also ensure that EU producers are able to respond to consumers’ calls for higher welfare products. Then, it should not have a major impact on exporting countries, as only a small proportion of their exports go to the EU market. In addition, producers in partner countries exporting to the EU are often a reduced group of economic actors of a significant size that already complies with EU sanitary and phytosanitary (SPS) requirements, meaning they should have the capacity to also comply with animal welfare requirements. Some might even appreciate having a clear set of rules to comply with, rather than a myriad of private higher requirements originating from the many EU-based retailers.

This report describes, for each key species, the impact that imposing animal welfare import requirements could have on source countries. To do so, it looks at the share that the EU market represents for top source countries – from an amount and a value perspective – and it also compares animal welfare standards in each country with those applied in the EU, and those that could be envisaged in the upcoming revision of the EU animal welfare legislation. As exporters are most often big multinational companies, it also identifies the commitments these companies have already adopted in the field of animal welfare, often beyond the legislation applying where they are based.

In addition to top source countries, the report also considers countries with which the EU is negotiating a free trade agreement (FTA), as animal welfare conditions in EU FTAs’ market access provision are not yet common place, meaning that the increased quantity of exports of animal products that could be generated by the FTA would not have to be produced under higher standards.

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THE KEY CONCLUSIONS ARE THE FOLLOWING:

- Requiring EU-equivalent animal welfare standards on imported products would be **economically viable** as the top exporting countries are **mainly developed countries** (i.e. United Kingdom, Norway, New Zealand, Switzerland, and the United States), or **middle income countries** (i.e. Brazil, Argentina, China, and Ukraine), and as exporters targeting the EU are mostly big **multinational companies**.

- Imposing animal welfare requirements on imported products should thus have a **limited economic impact on developing and low income countries** as they are not key exporters to the EU, partly because of existing EU SPS standards.

- **Imposing animal welfare-related import requirements could have positive impacts beyond exporters targeting the EU market** as companies that supply domestic or third markets could follow the transition to sustainable methods of production.

- Extending the EU’s animal welfare standards to imports would also contribute to fuelling discussions in partner countries such as the such as the United Kingdom, which, is the main EU source of supply of animal based products, to adopt a similar revision of its animal welfare legislation.

COULD THE UNITED STATES BE AN UNEXPECTED ALLY FOR THE EU?

- 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 marketing of imported products raised in these conditions**. In May 2023, the Supreme Court upheld the legislation, making its implementation effective for all products as of July 2023. ³

- In 2019, Michigan passed Senate Bill 0174, which mandates cage-free conditions for laying hens and prohibits the sale of non-cage-free eggs by December 2024.⁴

- At least 15 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.

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1

APPLYING EU BROILER WELFARE STANDARDS TO IMPORTS

1.1 WHERE DOES THE EU IMPORT POULTRY FROM?

The four main exporters of poultry meat to the EU in 2022 were Brazil, the United Kingdom, Ukraine and Thailand.\(^5\)

In most cases, the EU is a relatively small market destination for exports of poultry products originating in key partner countries, both in terms of volume and value. For instance, in 2022:

- Brazil’s main export market in value terms for poultry meat was China (12.5%), followed by the United Arab Emirates (10.6%), Japan (9%) and Saudi Arabia (7%). The EU’s market accounted only for approximately 1.7% of Brazilian exports.\(^6\)

- Thailand’s main export markets in value terms were China (39%) and Japan (37%). Malaysia was the third market destination with 9% of exports, while exports

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to the EU only accounted for 0.7% of Thailand’s poultry exports in value terms.7

- In 2021, Ukraine’s first export market in value terms was Saudi Arabia (24%), and the EU was second with 23% of exports. However, the trade picture is changing rapidly following the Russian invasion of the country and the EU’s regulation allowing for temporary full trade liberalisation.8 Poultry products are now being imported at a much higher rate than previous years: poultry meat exports to the EU reached 163,675 tonnes in 2022, an 80% increase on 2021.9

1.2 BROILER WELFARE IN THE EU

The revised EU legislation should contain new standards on the welfare of meat chicken. While the details are not known at the moment, the new standards should take into account the EFSA opinion recently delivered on the topic, which recommends, among others, to use slower-growing commercial breeds, with a growth rate limited to a maximum of 50g/day; a maximum stocking density of 11 kg/m²; and to avoid all forms of mutilation.10 New standards could also be based on the European Chicken Commitment,11 already supported by 570 companies across the globe.12

1.3 BROILER WELFARE ISSUES IN KEY TRADING PARTNERS

Three main exporters of poultry products to the EU already have poor or lower animal welfare standards compared to the EU’s current rules. The revision of the legislation will only increase this gap, underlining the importance to include imports within the scope of the new rules. The United Kingdom currently has EU-equivalent standards and is more likely to follow once the EU will have updated its legislation.

NEW EU LEGISLATION CAN ENHANCE EXISTING PRACTICES IN THE BRAZILIAN POULTRY SECTOR

Trade in agri-food products often involves few but large companies. In Brazil, there are two main exporters of poultry meat: the BRF Group and JBS. These companies should be able to comply with the new and revised animal welfare standards given their size and their existing animal welfare policies and commitments.

The BRF Group, in its 2021 sustainability plan13 set the aim to:

- Certify 100% of the plants respect their customers’ animal welfare requirements by 2025.
- Ensure zero tolerance to animal mistreatment, whether through abuse or neglect.
- Use environmental enrichment in 100% of the integration of poultry by 2025.
- Ensure that 100% of the poultry in the integration system are cage-free globally by 2023.

JBS recognised in its 2021 sustainability report14 the ‘Five Freedoms’ and underlined that poultry meat properties undergo stringent assessments for compliance with animal welfare practices, including: low stock densities, layout, technology and temperature conditions suited for animals’ health and physiological needs, equipment management, animal husbandry practices, and controlled environments (lighting, ventilation, humidity and temperature) to allow animals to express their natural behaviour.

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STOP CRUEL IMPORTS | Applying EU animal welfare standards to all products placed on the EU market

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. On-farm welfare standards in the Brazilian chicken sector are thus not regulated by legislation. Instead, ABPA - the body representing the animal protein sector and producers in Brazil - establishes general recommendations to follow basic welfare standards. According to local animal welfare organisations, however, ABPA often prevents any improvement on welfare in the sector. For instance, on **stocking density**, animal welfare specialists, 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 39 kg/m², and it remains common for Brazilian farms to apply a density of up to 42 kg/m². Recent reports also underlined that many Brazilian producers have started to replace the open barns (with curtains) systems by closed barns with air conditioning systems in order to better control the temperature and the light. In 2020, in Paraná, which is the Brazilian state with the largest chicken production, almost 30% of the farms had already converted to a “dark house” system.

Before the war, Ukraine had not yet started implementing the roughly EU-equivalent animal welfare standards it had adopted through a ministerial order in February 2021, in line with commitments in the EU-Ukraine Deep Comprehensive Free Trade Agreement (DCFTA). The rules on the welfare of broiler chicken were only supposed to enter into force as of 2026. Ukraine also had not adopted rules on transport or slaughter of animals. As poultry meat production is becoming an export-oriented sector in Ukraine, and as the EU represents 28% of Ukrainian production is becoming an export-oriented sector in Ukraine, and as the EU represents 28% of Ukrainian poultry exports, the EU has the leverage to influence positive change in Ukraine, which would also be consistent with Ukraine’s likely future accession to the EU. In addition, requiring EU animal welfare standards to apply to imported poultry products should not be opposed by leading Ukrainian producers, such as MHP, as they claim to already comply with EU standards - even if recent investigations cast doubt on the veracity of these claims. Indeed, in 2020 MHP adopted a Corporate Animal Welfare Policy which sets out clear objectives on antibiotics reduction, no cage rearing, provision of animals’ natural needs, sufficient space, appropriate housing and veterinary care. The Corporate Animal Welfare Policy also prohibits the carrying out of surgical interventions, inhumane killing methods and forcing animals to perform actions unnatural for them.

**Thailand** 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. Trade in agri-food products often involves few players. In the case of Thailand, most of the exports of poultry meat are done by four companies: CPF, Betagro (BTG), GFPT and Thai Food Group (TFG). These big corporations have differing sustainability and animal welfare commitments. For instance CPF committed to “follow best practices for protecting physical and mental welfare of animals through maintaining appropriate living conditions, good hygiene, comfortable dwelling and sufficient food and water.” Their 2030 target for broilers is “100% environmental enrichment” up from 60% in 2022. These commitments seem to overlook key aspects of broiler welfare, such as stocking densities, which were taken into account by Betagro. Indeed, Betagro, in addition to enrichment, committed to reduce stocking densities to allow chickens to express natural behaviours such as pecking, dust-bathing, and preening.

Applying the new animal welfare legislation to imported products will - in addition to improving companies’ sustainability and animal welfare commitments - streamline the standards companies like CPF and Betagro should follow, thereby avoiding a myriad of private standards that can create confusion to consumers.

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2. APPLYING EU LAYING HEN WELFARE STANDARDS TO IMPORTS

2.1 WHERE DOES THE EU IMPORT EGGS AND EGG PRODUCTS FROM?

In 2022, the vast majority of imported eggs and egg products came from the United Kingdom and Ukraine. The other main countries of origin, to a lesser extent, were Switzerland, Albania and North Macedonia.²³

- Ukraine exported €1.14 billion worth of eggs and egg products in 2021, primarily to Iraq (22%), United Arab Emirates (20%), and Saudi Arabia (5%). The EU market accounted for approximately 8% of exports in value terms.²⁴ However, following the application of the EU’s regulation allowing for temporary full trade liberalisation, egg products are being imported at a much higher rate, with over 17,000 tonnes in 2022, up 300% from 2021.²⁵

2.2 LAYING HEN WELFARE IN THE EU

The shift in European consumption of eggs and egg products towards eggs derived from cage-free production systems has shown that the welfare of laying hens is a concern for European consumers. The upcoming revision of the EU animal welfare legislation should bring progress for that species, such as cage-free systems, a ban on male chick culling, lower stocking density (no more than 7 hens/m²), more enrichment and a ban on mutilations (these standards are detailed in the Hens’ Asks).26

The opportunity to apply import requirements related to cage-free systems would be supported by 2,640 companies across the globe that have already committed to go cage-free,27 including Latin American companies28 such as Havanna, the leading Argentinian manufacturer of “alfajores”, chocolates and other products.29 Indeed, Havanna, along with other Argentinean companies such as Carrefour Argentina, Café Martinez, Le Pain Quotidien, Harper’s Juice Bar, Tostado Café Club, Freddo, Green Eat and Tea Connection announced that they are joining the global cage-free movement committing to switch to a 100% cage-free egg supply chain.30

Global companies member of the Global Coalition for Animal Welfare (GCAW) such as Unilever, Tesco and Nestlé, have not only committed to go cage-free,31 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.32

2.3 LAYING HEN WELFARE ISSUES IN KEY EXPORTING COUNTRIES

The top two exporting countries of eggs and egg products - the United Kingdom and Ukraine - represent 93% of the trade. Imposing welfare related requirements on egg-related imports should thus be feasible. The United Kingdom already has EU equivalent animal welfare standards and is likely to follow suit once the EU goes cage-free, or at least, should respect the ethical wishes of EU citizens on that matter. Ukraine is a candidate for accession to the EU - meaning it should prepare to align with all EU animal welfare standards in the future.

Before the war, Ukraine33 had not begun implementing the roughly EU-equivalent animal welfare standards it had adopted through a ministerial order in February 2021, in line with commitments in the EU-Ukraine DCFTA. The rules on the welfare of laying hens were only supposed to enter into force as of 2026. Ukrainian farm production still 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.

Requiring EU animal welfare standards to apply to imported eggs and egg products should not be opposed by leading Ukrainian producers, such as Ovostar, as they claim to already comply with EU standards - although recent investigations cast doubt on the veracity of these claims.34 Furthermore 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 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.

As trade in eggs and egg products could increase once the EU concludes certain FTAs currently under negotiation with significant egg producing countries, it is also interesting to consider the standards of these countries:

**Thailand**35: 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

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cruellest practices in animal agriculture. However, the EU could encourage improvements. Charoen Pokphand Foods, a large food-manufacturing organisation in Thailand, announced in 2020 it will increase production of cage-free eggs in Thailand by 10 million each year to serve growing demand. Furthermore, 97% of Thai consumers think that the government should increase minimum welfare standards and Thailand’s legislation mandates the inclusion of animal welfare organisations in the highest decision-making authorities with regards to animal welfare.

India has not banned the worst forms of confinement for farm animals, including the use of battery cages and farrowing and sow crates. There are no guidelines or legislation on detailed husbandry issues for different species of farmed animals. Surgical operations, such as beak trimming are done without anaesthesia or pain relief. Requiring EU animal welfare standards to apply to imports could encourage discussions on laying hen welfare that are already happening in India. In 2014, the Animal Welfare Board of India declared that the confinement of 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 what existed in the EU when battery cages were still allowed. Yet, cage-free farming is being pioneered in India by producers such as the Happy Hens Farm and Keggfarms, headquartered in Bengaluru and Haryana.

The draft EU-Mercosur FTA introduced the first animal welfare-based condition in a trade agreement. In order to benefit from preferential tariffs, shelled eggs producers from Mercosur must apply welfare standards equivalent to those applied in the EU. Yet, this measure leaves out egg products, as well as other animal based products.

In Mercosur countries, Brazil has the worst forms of confinement. Battery cages for laying hens are not prohibited by legislation.

As trade flows can change overtime, it is interesting to note that other producing countries that do not export to the EU yet might feel impacted by the EU’s new and revised standards.

China 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. The only piece of legislation touching upon welfare is the Husbandry Law that 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, even if the Ministry of Agriculture has produced non-binding guidelines referring to animal welfare. As a result, there is no national legislation requiring the stunning of animals prior to slaughter for all farm animals and humane slaughter is only required in Shandong, for poultry.

The United States 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 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.

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38 Ibid, pp. 14
3. APPLYING EU PIG WELFARE STANDARDS TO IMPORTS

3.1 WHERE DOES THE EU IMPORT PIG MEAT FROM?

In 2022, the overwhelming majority of pig meat imported into the EU came from the United Kingdom. The other main countries of origin were Switzerland, Chile, Norway and China.\(^44\)

- The United Kingdom exported €437 million worth of pig meat in 2021, primarily to China (46%), Ireland (18%) and Germany (8%). The EU market accounted for approximately 26% of exports in value terms, with €115 million worth of imports.\(^45\)

China exported €117 million worth of pig meat in 2021, primarily to Hong Kong and Macau. The EU market accounted for approximately 5% of exports in value terms, with €6.2 million worth of imports.46

In 2021, Chile exported €621 million worth of pig meat, making it the 12th largest exporter of pig meat in the world. The main destinations of pig meat exports from Chile were China (49%), South Korea (22%), Japan (19%), Colombia (4%), and Costa Rica (1%). The EU market accounted for approximately 0.8% of exports in value terms, with less than €1 million worth of imports47.

Requiring pig-related imports to respect animal welfare standards similar to those applied in the EU would have minor consequences on trade flows as the main exporter is the United Kingdom, which currently has EU equivalent animal welfare standards, and which is likely to be able to upgrade in order to continue exporting. Extending the new animal welfare standards to imported products could even give a positive impetus to the United Kingdom - an already animal welfare like-minded country - to start discussions about the revision of its own legislation.

3.2 PIG WELFARE IN THE EU

While the details of the upcoming revision of legislation are unknown, there is hope that new rules will include cage-free systems; lower stocking densities; ban on mutilations; and ambitious provisions of enrichment.

3.3 PIG WELFARE ISSUES IN KEY EXPORTING COUNTRIES

It is worth noting that at the moment, over 93% of imports of pig meat already comply with EU’s animal welfare standards as the main countries of origin are the United Kingdom and Switzerland. The remaining countries are developed countries, hence applying additional animal welfare standards to imports should not impact developing or low income countries that export small quantities to the EU, such as Chile and China.

In Chile, Agrosuper holds 70% of the market share in pig production48, and is one the four companies member of ChilePork, the association gathering and representing Chilean pork exporters.49 Agrosuper claims to be “100% committed to animal welfare” and has set the objective to comply with the Five Freedoms in line with WOAH standards. However, most of their animal welfare policies are for now oriented towards animal health, for example excluding antibiotics or hormones as growth promoters. Nevertheless, as it has a vertical production, Agrosuper claims to integrate animal welfare throughout its production, from animal feed to transport and slaughter.

In its 2022 report, Agrosuper reported to no longer practise mutilations on pigs, to have improved environmental and transport conditions - with an 8-hour limit of transport, and to start gestation barns instead of gestation crates for sows.50 Agrosuper is also starting audits to obtain the WelfCert certification.51

Finally, in a public letter from 2021, Agrosuper acknowledged that animal welfare needs "continuous improvements", and announced they have asked their suppliers to comply with their animal welfare policy, demonstrating that animal welfare policies can have a snowball effect.52

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Chile: 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 2.25 m² in group housing. Furthermore, there is no requirement for enrichment and **almost all pigs are tail-docked**.

China: In addition to the lack of animal welfare related legislation mentioned in previous sections, the key concerns in terms of pig welfare in China relate to the use of **gestation crates** and **clipping of ears and tail slacks**. Imposing EU animal welfare standards could incentivise producers to rely on higher animal welfare standards in their production. 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. Some companies, such as Laiwu breeder Pig Farm Co, Henan Liqun farming Co, and Henan Nongduoduo Agro-Pastoral Ecological Technology Co, also committed to higher welfare pork production in China.

Trade flows could increase if the EU concludes certain FTAs that it is now negotiating with pig producing countries. It is also interesting to consider the standards of these countries:

**Brazil**: The worst forms of confinement, such as sow stalls and farrowing crates for pigs are not prohibited by legislation. However, in 2014, BRF - Brazil’s largest pork producer - committed to phasing out the continuous use of gestation crates by 2026. Finally, 81% of Brazilians perceive farm animal welfare to be important.

**Argentina** uses the worst forms of confinement for farm animals, including sow stalls and farrowing crates. Tail-docking, tooth pulling, and castration without anaesthetic are legal.
4.

APPLYING EU CATTLE WELFARE STANDARDS TO IMPORTS

4.1

BEEF PRODUCTS/BOVINE SKINS

In 2022, the majority of beef imported into the EU originated from the United Kingdom and Brazil. The next most significant source countries were the United States and Argentina.

- **Brazil** exported €7.44 billion worth of beef products in 2021, primarily to China (48%), Hong Kong (7%) and Chile (7%). The EU market accounted for approximately 4.4% of exports in value terms, with €331 million worth of imports.

- **Argentina** exported €2.53 billion worth of beef in 2021, primarily to China (61%), Germany (8%) and Chile (8%). The EU accounted for 15% of exports in value terms, with €377 million worth of imports.

- In 2021, the top 5 United States beef export markets made up 80% of total beef exports. These markets were Japan, South Korea, China, Mexico, and Canada. The two largest beef markets—Japan and South Korea—accounted for about 47% of exports and the third largest market was China, accounting for 16% of exports. The EU accounted for less than 3% in value terms of US beef exports.

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**IMPORTS OF BEEF & BOVINE SKINS**

Top trading partners in 2022

<table>
<thead>
<tr>
<th></th>
<th>Million Tonnes</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Kingdom</td>
<td>Beef: 75, Bovine Skins: 50</td>
</tr>
<tr>
<td>Brazil</td>
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<tr>
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</tr>
<tr>
<td>United States</td>
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</tr>
<tr>
<td>Argentina</td>
<td>Beef: 10, Bovine Skins: 15</td>
</tr>
</tbody>
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4.2 CATTLE WELFARE IN THE EU

The upcoming revision of the EU animal welfare legislation is the opportunity to develop standards for cattle, which at the moment are missing beyond what exists in the General Farming directive. These standards should include the explicit ban of feedlots in the EU, which are not a common practice on the continent yet.

4.3 CATTLE WELFARE ISSUES IN EXPORTING COUNTRIES

New standards for cattle, in particular conditions on grass-fed animals (and thus on feedlots), should also apply to imported products as most of the EU’s trading partners - except the United Kingdom - have or are increasingly developing feedlots in order to export to the EU.

This is partly due to the EU tariff-rate quota (TRQ) for “hormone-free beef”. This TRQ was created to provide more market access to the United States, without explicitly doing so. This was achieved by imposing a specific method of production - a diet of more than 63% of grains, which is only achievable on feedlots - to access the TRQ. As a result, in the United States, feedlots with a capacity of 32,000 head or more market around 40% of fed cattle; and the industry continues to shift toward a small number of very large, specialised feedlots that focus on cattle destined for particular markets, such as the EU, as it requires cattle not treated with hormones.

As the in-tariff of this TRQ is 0%, countries like Uruguay and Argentina were incentivised to develop feedlots simply to be able to access this TRQ, rather than the Hilton quota, which commended pasture-based production for such countries. While the impact of the “hormone-free beef” TRQ is now lower as most of the volume is explicitly reserved to the United States, switching production back, if it happens, will take time.

According to Trase data, the market for beef exports is quite concentrated in Brazil. Three major companies - JBS, Minerva and Marfrig - accounted for over 65% of the exports for the past 5 years, and JBS is the biggest of the three, accounting for one third of Brazilian beef exports.

JBS and its branch in Brazil claims to be “committed to ensuring animal welfare” in its production for domestic or foreign markets and to be “developing a global, strategic agenda”. However, at the moment JBS has no commitments for cattle, despite admitting buying almost 9,000 cattle from one of Brazil’s biggest deforesters from 2018 to 2022.

Having to comply with EU animal welfare standards would help raise the level of ambitions of their commitments. Their latest performance report on animal welfare is more encouraging - with mentions to transport of cattle, non-use of certain mutilations for broilers and piglets, and cage-free commitments for eggs. This shows the company can implement more animal welfare standards with the right incentives.

EU LEGISLATION CAN HELP COMPANIES IMPROVE THEIR COMMITMENTS IN BRAZIL

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WELFARE AND ENVIRONMENTAL IMPACT 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 health.\(^6\) 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.

Feedlots are also detrimental to the environment and to public health.\(^6\)\(^9\) Indeed, they produce huge amounts of animal waste and other pollutants that can be harmful to the environment.

Feedlot waste is likely to contain cleaning agents, silage leachate, chemicals used in livestock care, antibiotic-resistant bacteria, ammonia, heavy metals, and milkhouse waste. This waste is often stored in waste storage pits or structures before disposal on farm fields. This is where feedlot waste enters surface water, contaminating it and causing water pollution. Runoff of feedlot waste into water streams can be detrimental to fish and other aquatic life and can cause “dead zones” in coastal areas. Feedlots also cause air pollution due to ammonia, particulate matter, odour, greenhouse gases, and volatile organic compounds emissions.

In addition to this, the new EU regulation on imported deforestation might also contribute to the development of feedlots in South America.\(^7\) In Brazil where feedlots already represent 10% of the meat production,\(^7\) some companies will now start sourcing their products from cattle in feedlots, by fear of otherwise falling in the geographical scope of the new regulation.

Even if the EU is a relatively small market for these trading partners, imposing cattle-related welfare requirements would help prevent any perverse effect of existing EU legislation (on imported deforestation and the “hormone-free beef” TRQ) regarding the development of feedlots.

\(^7\) EU to ban certain animal products that contribute to deforestation from the EU market. (n.d.). Eurogroup for Animals. https://bit.ly/3ril4se
Trading partners of farmed aquatic products greatly depend on the species. However, in 2021, nearly 65% of imported aquatics products consisted of salmon, and Norway accounted for 87% of these imports, followed by the United Kingdom (8%), Faroes (3%) 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.72

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%).

5.1 AQUATIC WELFARE IN THE EU

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 impose on-farm welfare standards in aquaculture including on transport.

These standards could 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.

The EU should also take the opportunity of the new and revised animal welfare legislation to ban animal products from cephalopod farming regardless of the origin.

5.2 AQUACULTURE STANDARDS AND ISSUES IN KEY EXPORTING COUNTRIES

Imposing EU standards on imported aquaculture products should be acceptable to exporting partners who already have extensive legislation. For instance Norway - the top exporter of salmon and trout - has quite extensive and higher fish welfare legislation including transport, different aspects of handling and husbandry, maximum stocking densities, and pre-slaughter stunning.

Ecuador, which is the EU’s main exporter of shrimp, is currently considering a new animal welfare regulation including ambitious elements on aquatic animal welfare for fish, shrimp & cephalopods.

For the vast majority of exporters that don’t have domestic standards, imposing EU animal welfare standards will help their producers with privileged market access, but also with increased production and reduced costs by reducing mortalities.

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Chile has regulated species-specific stocking densities for salmon and trout, but fish welfare issues remain across the life stages of the main species, including salmon, and in a range of production systems. 

- 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.

Vietnam is a key trading partner of shrimp, catfish and tilapia and the quantity of animal products imported by the EU has been increasing due to the implementation of the trade agreement since August 2020. However, Vietnamese aquaculture suffers from serious welfare concerns, including exceptionally high stocking densities and poor handling and 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 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 serious environmental and human health impacts.

- 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 and lack of oxygen in the water. Constant movement during a prolonged period in an environment with noise and vibrations 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 farmed fish and shrimp poses human health and food safety concerns, and is also responsible for the contamination of the environment.

India is one of the top 5 exporters to the EU of tilapia and shrimp. In the absence of animal welfare standards applied to imports, the implementation of a future trade agreement will likely intensify the quantity of lower welfare animal products imported by the EU which are produced with inhumane practices that 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 and lack of oxygen in the water. Constant movement during a prolonged period in an environment with noise and vibrations 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 farmed fish and shrimp poses human health and food safety concerns, and is also responsible for the contamination of the environment.

United States: The Humane Slaughter Act does not apply to fish, and the EU imports large amounts of fish products from the United States.
Eurogroup for Animals believes the upcoming revision of the animal welfare legislation is the perfect opportunity to match European citizens’ expectations and to stop importing cruelty. The time is right for imported animal products to respect the same animal welfare standards as those applied in the EU.

Applying the new and revised standards to all products placed in the EU market, regardless of their origin, would be feasible for various reasons:

- The EU imports animal based products from few countries, which are developed or middle-income countries. Hence, developing or low-income countries, which most often do not export to the EU anyway as they do not meet the EU’s SPS standards, would not be much impacted.

- Trading partners will be impacted depending on the animal based product they export to the EU. For instance, in the case of pigs, the main trading partner is the United Kingdom (85% of imports), whereas for poultry, the partners are Brazil (35%) the United Kingdom (34%), Ukraine (21%) and Thailand (8%).

- Trade in agri-food products involves few actors. The new rules would impact big companies - JBS, BFR Group, MHP, Ovostar, Agrosuper - who very often claim to have ambitious animal welfare policies and/or commitments. They are also companies that are used to adapt to various standards depending on their export markets.

Finally, including imported animal based products in the legislation will contribute to the achievement of the objectives of the legislation. Only by applying its standards to third countries will the EU truly improve the welfare of animals in the EU and abroad.
TOP 5 EXPORTERS OF ANIMAL PRODUCTS TO THE EU IN 2022

CHICKENS

Broilers
1. Brazil ....................................................200,157,886 kg
2. United Kingdom ....................................197,854,614 kg
3. Ukraine .............................................120,580,332 kg
4. Thailand .............................................48,676,123 kg
5. Switzerland ...........................................3,335,006 kg

Laying hens (egg/egg products)
1. United Kingdom ....................................23,377,260 kg
2. Ukraine .............................................17,104,720 kg
3. Switzerland ...........................................821,474 kg
4. North Macedonia ....................................764,576 kg
5. Albania ....................................................775,314 kg

PIGS

Pig meat & pig fat
1. United Kingdom ....................................86,988,886 kg
2. Switzerland ..........................................7,119,639 kg
3. Chile ...................................................3,737,934 kg
4. Norway .............................................1,821,712 kg
5. China ...................................................1,590,685 kg

CATTLE

Beef
1. United Kingdom ....................................104,299,299 kg
2. Brazil ....................................................55,368,765 kg
3. Argentina ............................................48,133,335 kg
4. Uruguay .............................................28,958,367 kg
5. United States .......................................13,364,984 kg

Bovine skins
1. Brazil .....................................................92,006,415 kg
2. United States .......................................53,358,927 kg
3. United Kingdom ....................................51,668,805 kg
4. New Zealand ......................................26,524,580 kg
5. Paraguay .............................................25,682,275 kg

Dairy products
1. United Kingdom ....................................1,002,546,780 kg
2. Switzerland ..........................................102,963,292 kg
3. Ukraine .............................................23,395,828 kg
4. Norway ...............................................19,332,874 kg
5. Serbia .................................................11,063,494 kg

FARMED FISH

Salmon
1. Norway ...............................................758,556,796 kg
2. United Kingdom ....................................52,927,926 kg
3. Faroes ...................................................32,070,256 kg
4. Iceland ...................................................23,016,774 kg
5. Chile ...................................................4,460,188 kg

Catfish
1. Vietnam ................................................52,897,891 kg
2. Russia ...................................................56,025 kg
3. United Kingdom ....................................41,635 kg
4. Argentina .............................................27,000 kg
5. Bangladesh ..........................................12,000 kg

Sea bream
1. Turkey .................................................36,121,418 kg
2. Albania ..................................................2,273,571 kg
3. Morocco ...............................................77,110 kg
4. United Kingdom ....................................13,395 kg
5. Tunisia .................................................2,600 kg

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7 ANNEX

STOP CRUEL IMPORTS | Applying EU animal welfare standards to all products placed on the EU market
**Tilapia**
1. China ............................................ 21,729,214 kg
2. Vietnam ....................................... 2,293,784 kg
3. Indonesia ..................................... 1,151,504 kg
4. Thailand ....................................... 469,774 kg
5. India ............................................. 355,403 kg

**Seabass**
1. Turkey .......................................... 19,706,162 kg
2. United Kingdom ............................ 249,724 kg
3. Albania .......................................... 20,855 kg
4. Morocco ......................................... 5,256 kg
5. Tunisia ........................................... 96 kg

**Trout**
1. Norway .......................................... 8,538,307 kg
2. Turkey .......................................... 7,122,598 kg
3. United Kingdom ............................. 2,922,341 kg
4. Albania .......................................... 577,084 kg
5. Bosnia and Herzegovina .................. 399,627 kg

**Farmed Shrimp**
1. Ecuador ....................................... 158,207,007 kg
2. India .......................................... 44,918,509 kg
3. Vietnam ....................................... 35,245,286 kg
4. Venezuela ..................................... 28,377,864 kg
5. Bangladesh ................................. 17,065,294 kg

**Goat/sheep**
1. United Kingdom ............................. 74,852,609 kg
2. New Zealand ................................. 53,403,456 kg
3. Australia ....................................... 4,143,838 kg
4. North Macedonia .......................... 2,151,853 kg
5. Chile ............................................. 1,258,794 kg

**Wool**
1. Australia ....................................... 27,266,076 kg
2. China .......................................... 24,869,343 kg
3. United Kingdom ............................ 22,609,497 kg
4. New Zealand ................................. 22,354,516 kg
5. South Africa ................................. 13,668,262 kg

**Bovine/sheep/goat fat**
1. Argentina ...................................... 16,766,195 kg
2. United Kingdom ............................ 16,048,080 kg
3. Uruguay ....................................... 11,516,080 kg
4. Israel ........................................... 4,107,911 kg
5. Serbia .......................................... 1,563,880 kg

**Horses**

**Horse meat**
1. Argentina ...................................... 10,213,825 kg
2. Uruguay ....................................... 4,191,402 kg
3. Iceland ......................................... 241,129 kg
4. United Kingdom ............................ 160,645 kg
5. Canada ......................................... 64,571 kg

**Other meats and offals**

**Edible offals (except poultry)**
1. United Kingdom ............................ 48,031,674 kg
2. Switzerland .................................. 12,043,673 kg
3. Norway ......................................... 2,598,683 kg
4. New Zealand ................................. 913,662 kg
5. China ........................................... 429,909 kg

**Other meats and offals (rabbits, frogs’ legs, game, etc)**
1. New Zealand ................................. 5,069,297 kg
2. China .......................................... 3,481,111 kg
3. United Kingdom ............................ 2,310,483 kg
4. Indonesia ...................................... 1,756,064 kg
5. Vietnam ........................................ 1,682,432 kg