



ANIMAL
ASK

IMPORTS TO MEET UK ANIMAL WELFARE STANDARDS

COUNTRY: **UNITED KINGDOM**

AUTHORS: REN SPRINGLEA
MAY 2022

ASK PRIORITISATION
RECOMMENDED



An extensive report researching a ban
on the import of products that don't
meet UK animal welfare standards

OVERVIEW

Whilst working with Animal Equality UK on their Ask Prioritisation, we saw an avenue for further exploration and prioritisation of asks within the wider UK context. We want our research to be as useful to as many groups as possible and as such, decided to run a simultaneous research process for the full UK context outside of the limitations of Animal Equality UK's scope.

We contacted all major animal advocacy organisations in this region and they were keen to understand the results of this UK-wide scoping following our research.

We would like to thank the experts we looked to for guidance in this report.

Animal Ask has been founded with the express aim to optimise and prioritise future asks to assist animal advocacy organisations in their efforts to reduce farmed animal suffering. We provide organisations with in-depth research narrowly targeted at key decisions between different animal asks, supporting organisations, individual activists, policymakers and donors so that they may do more good in the long-term.



EXECUTIVE SUMMARY

This ask requires meat and animal products imported into the UK to meet the UK's standards on animal welfare during production. This could be achieved through a ban on importing products that do not meet the UK's welfare standards (whether all welfare standards or a set of core welfare standards). Such a ban would cause UK consumers to purchase less lower-welfare products and more higher-welfare products. This, in turn, would mean that there is an overall increase in higher-welfare production, improving the lives of farm animals. Additionally, when there are future welfare improvements made in the UK, this ask would also restrict the import of products that do not meet those future standards. Other versions of this ask include a ban on particular products (e.g. foie gras) or placing lower tariffs on higher-welfare products.

Our cost-effectiveness analysis suggests that this ask has the potential to benefit a large number of animals. This analysis also suggests that most of the benefit would come from improving the lives of chickens who are raised for meat in Thailand and, to a lesser extent, Brazil. Given this, it could be a useful strategy

to focus specifically on improving the welfare conditions of chickens destined for import to the UK. However, such a strategy may cause harm to people by reinforcing xenophobic ideas and causing jobs to be lost in those countries, and so the wellbeing of people would also need to be ensured.

This ask's tractability is uncertain, although we are cautiously optimistic given the right campaign. Public support is very high, with public opinion surveys generally finding that 75% or more of respondents are supportive. This ask also has the support of the farming industry, many non-governmental organisations, and some government departments. However, the support of MPs is more complex. There is a partisan divide, with Conservative MPs generally opposed, while MPs from all other major parties and most minor parties are supportive.

Some additional uncertainties remain. First, it is unclear what proportion of imports this ask would apply to. The trade deals that account for most of the UK's imports are already finalised. If this ask only applies to future trade agreements or to trade outside current agreements, then only a minority of the

UK's imports would be affected. However, the UK has not yet negotiated trade agreements with the US, the Mercosur countries (Argentina, Brazil, Paraguay, and Uruguay), or Thailand. Each of these deals offer scope for animal welfare improvements. Second, there is some uncertainty as to whether an import ban would survive a challenge under international law, although most legal analyses have concluded that such a ban would survive.

Overall, we conclude that this ask has the potential to be high-impact and benefit the lives of many animals.

We recommend that organisations in the UK consider this ask for a future campaign. We believe that it would be most effective for organisations to focus on securing commitments from parties in their manifestos for the upcoming general election, for which there is a window of opportunity open now (mid-2022). We also believe that it would be effective to focus on collaborating with the farming community, and possibly building support among Conservative MPs. Corporate campaigns may also offer a way to achieve this ask.

CONTENTS

DESCRIPTION OF THE ASK	6
COMPARING ANIMAL WELFARE IN THE UK AND TRADE PARTNERS	9
TRACTABILITY AND SUPPORT	14
PROGRESS OF TRADE AGREEMENTS	19
LEGAL HURDLES	22
EXPERT INTERVIEWS	25
COST EFFECTIVENESS ANALYSIS	27
ALTERNATIVE POLICIES	30
INFORMED CONSIDERATIONS	34
CONCLUSION	37
BIBLIOGRAPHY	38

THE ASK

This ask involves requiring meat and animal products imported into the UK¹ to meet the UK's standards on animal welfare during production. Most likely, this would require imports to meet a set of particular core welfare standards, rather than all domestic welfare standards (Trade & Animal Welfare Coalition 2021a).

Currently, the UK is in the process of negotiating numerous trade agreements, given the country's recent exit from the EU. This ask could be implemented via a clause in these trade agreements that requires imports to meet UK animal welfare standards; or a Bill applying this requirement across all trading partners; or a Bill giving MPs the power to place this requirement on particular products. Each of these mechanisms would have different benefits and risks. For example, implementing this ask within trade agreements would have much lower legal risk; a Bill implementing a blanket ban would be much faster and more comprehensive; and a power enabling the MPs to decide requirements might allow welfare

standards on imports to increase more easily in the future. There are alternative options, including multilateral agreements, preferential tariffs, labelling, and retailer action (see section "Alternative policies"). This ask has been promoted by several animal advocacy organisations (Stevenson 2018).

During the UK's ongoing trade negotiations, government departments, many non-governmental organisations, and many members of the farming community have expressed concerns about unrestricted imports of lower-welfare meat and animal products. Such imports present three main risks for animal welfare (Offor 2020). Firstly, lower-welfare imports can dilute the UK market, increasing demand by UK consumers for cheaper, lower-welfare products. Secondly, lower-welfare imports may come to dominate the UK's market, expanding lower-welfare production in other countries (Grethe 2007). Thirdly, since lower-welfare products are cheaper to produce, UK farmers may not be able to compete

¹ In this report, we focus on the UK. However, the trade patterns of Northern Ireland are likely to be different, given the effects of the Northern Ireland Protocol. If this is the case, then this report and its conclusions would instead apply to Great Britain only.

with foreign producers (House of Lords 2017). As such, farmers may pressure the UK government to abandon, weaken, or slow the improvement of the UK's welfare standards (Trade and Agriculture Commission 2021; House of Lords 2017; Offor 2020).

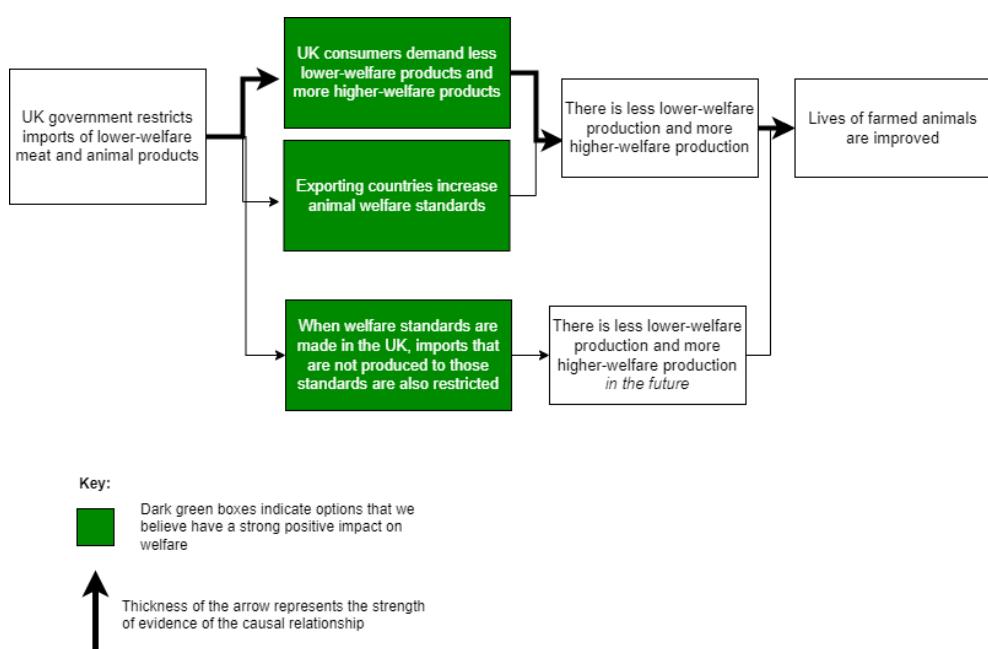
Ideally, this ask would avert these three risks. It is unlikely that this ask would actually change standards in other countries, though this depends on how important the UK market is to each particular industry within a given country (Cox 2020).

THEORY OF CHANGE

The causal chain of this ask is summarised below. To begin, the UK government restricts imports on meat and animal products produced to welfare standards lower than the UK's. This causes UK consumers to purchase less lower-welfare products and more higher-welfare products. This, in turn, means that there is an overall increase in higher-welfare production, improving the lives of farm animals.

Additionally, this ask might also apply to future asks in the UK. In other words, when there are future welfare improvements made in the UK, this ask would also restrict the import of products that do not meet those future standards. We expect that this effect would be most significant if legal protections are granted to fish, but this effect is also relevant to welfare improvements for other groups of animals. Although this would depend on how this ask is implemented in legislation, we believe that this dimension of the ask may magnify its overall impact considerably. Separately, this ask might enable the UK government to increase domestic standards even further, as there could be greater acceptance of higher standards among the UK farming community if such standards are applied to imports in parallel.

There may also be some exporting countries that increase their animal welfare standards to gain access to the UK market, whether via individual farms increasing their standards or governments introducing new regulations. However, we believe that this effect would be small (Cox 2020).



COMPARING ANIMAL WELFARE IN THE UK AND TRADE PARTNERS

Here, we summarise some key differences in farm animal welfare standards between the UK and its trade partners. These descriptions are not exhaustive. Rather, we intend to list some of the key differences between animal welfare standards in the UK and its trade partners as one way of illustrating the practices that may change if this ask is implemented. In other words, these are some of the concrete ways that animals may benefit from this ask.

For this section, we have selected five trade partners that we believe are particularly relevant for this ask. The EU is responsible for the vast majority of the UK's trade in agricultural products. Similarly, Australia and New Zealand are of particular relevance for certain meat products. However, those three trading partners have already agreed on the details of trade agreements with the UK. If this ask is implemented as a blanket import ban, then this ask could still apply to those trade agreements. It remains unclear what form this ask would take in reality. Given this, we also discuss two trade

partners that are responsible for large amounts of trade in meat and animal products, but have not yet agreed on post-Brexit trade agreements with the UK: the US and Mercosur (a trade bloc consisting of Argentina, Brazil, Paraguay, and Uruguay). Note that further details on the current state of trade negotiations are given in the "Progress of trade agreements" section.

The overall scores for each country and trading bloc for "Protecting animals used in farming" are given in Table 1. These scores are from the Animal Protection Index, published by World Animal Protection (2020a). We elaborate on these scores below.

Table 1: For each country or bloc discussed in this section, this table lists the score for that country or bloc for the category "Protecting animals used in farming". Scores range from A (best) to G (worst).

Scores are from the Animal Protection Index by World Animal Protection (2020a). Note that the score for the category "Protecting animals used in farming" is different from the overall score from the Index. For the EU and Mercosur, we have listed all countries within those blocs that were given scores in the Index.

COUNTRY OR BLOC	SCORE FOR FARMED ANIMALS
UK	D
EU	B (Austria, Sweden) C (Denmark, Netherlands, Poland) D (France, Germany, Italy, Spain) F (Romania)
Australia	E
New Zealand	C
US	E
Mercosur	F (Argentina, Uruguay) D (Brazil)

Comparing UK and the EU

Overall, the EU has very similar animal welfare standards to the UK (Stevenson 2018). This is unsurprising, given the fact that the UK was a member state of the EU until recently. Critically, the EU is also exploring this ask - the Presidency recently commissioned a report that will explore whether imports could be restricted based on standards of animal welfare, health, and the environment (European Commission 2022).

However, there are some notable differences between countries. In the "Protecting animals used in farming" section of the Animal Protection Index,

EU countries scored B (two countries), C (three countries), D (four countries) and F (one country). This compares to the UK's score of D. Notably, only one EU country scored worse than the UK: Romania, which scored F.

Furthermore, the UK has begun the process of transposing EU animal welfare legislation into UK law. In doing so, the UK is taking the opportunity to review animal welfare standards and improve these standards where possible (House of Lords 2017). For example, the UK government is currently reviewing the limits on animal transport times. Similarly, the Animal

Welfare (Kept Animals) Bill, if passed, would ban the live export of animals.

If the UK does improve animal welfare standards, then this ask may improve the lives of animals in the EU. Also, if this ask is *not* implemented, then the existence of a free-trade agreement with the EU might discourage the government from making large improvements to welfare.

Therefore, this ask may bring some benefits to animals in the EU. However, given the close similarity between the animal welfare standards in the UK and the EU, we expect that these benefits would be small. On top of this, the UK and the EU have already concluded a trade agreement, so whether this ask affects animals in the EU depends on how this ask is implemented.

Comparing UK and Australia

Overall, Australia has worse animal welfare standards than the UK. In the "Protecting animals used in farming" section of the Animal Protection Index, Australia scored an E compared to the UK's score of D.

Australia has many welfare practises that are banned or restricted in the UK

(Trade & Animal Welfare Coalition 2021b):

- In Australia, there is no requirement for CCTV in slaughterhouses. In the UK, almost all slaughterhouses are equipped with CCTV.
- In Australia, barren battery cages for hens are widespread. These cages are banned in the UK.
- In Australia, it is legal to transport cows and sheep for 48 hours without food or water. In the UK, the maximum journey time is 28 hours, and a one-hour rest is required after 14 hours (although this is under review by the government).
- In Australia, the maximum stocking density for hens allows 550 square centimetres per hen. This is smaller than the 750 square centimetres required in the UK.
- In Australia, it is legal to practise mulesing. This procedure involves removing strips of skin from the buttocks of sheep, often without pain relief. This procedure is banned in the UK.
- In Australia, it is legal to feed beef with hormones. This practice is banned in the UK.
- In Australia, it is legal to practise zero-grazing for cows. This involves keeping cows in barns and feeding them harvested grass,

rather than allowing the cows to graze outdoors. This practice does not occur in the UK.

- In Australia, it is legal to keep pigs in sow stalls, although this practice is restricted and uncommon. This practice is banned in the UK.
- In Australia, it is legal to dock the tails of pigs, and this practice is widespread. In the UK, this practice is theoretically restricted, although it remains widespread in reality.
- In Australia, the use of antibiotics and yield-enhancing drugs is many times higher than that in the UK.

For these reasons, we expect this ask would significantly improve the lives of the animals raised in Australia for export to the UK. However, the UK and Australia have already signed a trade agreement, and so whether this ask affects animals in Australia depends on how this ask is implemented.

Comparing UK and New Zealand

Overall, animal welfare standards in New Zealand and the UK are considered broadly equivalent (RSPCA 2020). In fact, New Zealand has better animal welfare standards than the UK in some instances. In the "Protecting animals used in farming" section of the Animal

Protection Index, New Zealand scored a C compared to the UK's score of D. The different scores reflect the fact that there are some advantages in New Zealand's animal welfare standards, such as that non-stun slaughter is banned in New Zealand.

As such, it is unlikely that a ban on lower-welfare imports from New Zealand would benefit the lives of animals. In addition, the UK and New Zealand have already reached an agreement in principle for a trade agreement, so whether this ask affects animals in New Zealand depends on how this ask is implemented.

Comparing UK and the US

Overall, the US has worse animal welfare standards than the UK. In the "Protecting animals used in farming" section of the Animal Protection Index, the US scored an E compared to the UK's score of D.

The US has many welfare practises that are banned or restricted in the UK (Treat and Delargy 2020; Stevenson 2018):

- In the US, there are no federal laws protecting animal welfare on farms. Animal welfare laws differ significantly from state to state.

- In the majority of US states, it is legal to keep egg-laying chickens in barren battery cages, and it is legal to keep pigs in sow stalls. These two practices are banned in the UK.
- In the US, it is legal to castrate male pigs without pain relief. In the UK, this practice is strongly regulated and uncommon.
- In the US, it is legal to use growth-promoting drugs, such as ractopamine. These drugs are banned in the UK.

For these reasons, we expect this ask to significantly improve the lives of the animals raised in the US for export to the UK.

Comparing UK and the Mercosur countries

Overall, the Mercosur countries (Argentina, Brazil, Paraguay, and Uruguay) have worse farm animal welfare standards than in the UK. In the "Protecting animals used in farming" section of the Animal Protection Index, the Mercosur countries scored F (two

countries) and D (one country). This compares to the UK's score of D.

Neither Uruguay nor Argentina have animal welfare laws that are specific to pigs, broiler chickens, egg-laying hens, or dairy cows. In Uruguay and Argentina, sow stalls, farrowing crates, cages, and surgical operations (e.g. mutilation of piglets, beak trimming of hens) are all legal. This compares to the UK, where all of these practices are either banned or regulated.

Brazil has demonstrated some progress in animal welfare by partnering with non-governmental organisations to develop welfare standards in some areas. However, Brazil still has no animal welfare laws that are specific to pigs, broiler chickens, or egg-laying hens (although there are specific laws for dairy cows).

For these reasons, we expect this ask to significantly improve the lives of the animals raised in the Mercosur countries for export to the UK.

TRACTABILITY AND SUPPORT

PUBLIC OPINION

The British public appears to be very supportive of this ask, as indicated by three recent public opinion surveys and an online petition.

In April 2021, 2,093 adults in the UK were asked whether they agree with the statement: "the Government should ensure all imported food meets the same environmental and animal welfare standards as food produced in the UK." 77% of respondents agreed, 6% disagreed, and we assume that the remaining 17% were unsure or supported neither view² (British Guild of Agricultural Journalists 2021). This question was part of a larger survey that involved many questions about meat safety, which may have affected the responses.

In August 2020, 2,065 adults in England were asked: "The UK Government made a commitment during the December 2019 General Election to not lower animal welfare standards in trade agreements with other countries after Brexit (i.e. after the UK left the European Union). To what extent, if at all, do you agree or disagree that the UK

Government should honour that commitment?" 75% of respondents agreed, 13% disagreed, and 12% did not know (Savanta ComRes 2020a). Interestingly, higher age appeared to be associated with higher agreement. This statement was framed in terms of the government honouring a commitment, which may have affected the level of support among respondents. Also, a commitment to "not lower animal welfare standards" could be interpreted as the UK not lowering its domestic standards, rather than banning lower-welfare imports. Respondents' support might change depending on how they interpret this commitment.

In January 2020, 2,015 adults in Great Britain were asked: "As the UK leaves the EU, to what extent, if at all, would you be concerned if the UK government relaxed laws on meat quality standards, in order to secure trade agreements with the USA and the rest of the world?" 81% of respondents reported being concerned, 12% reported not being concerned, and 7% did not know (Savanta ComRes 2020b). Notably, this question did not mention animal welfare, and it was part of a larger

² We were unable to find the full report of this particular survey online.

survey that involved many questions about meat safety which may have affected the responses.

While each survey has particular nuances, their findings are consistent in finding high public support for the government maintaining high standards of food production. All three surveys were conducted by Savanta ComRes, with the results of all three weighted to be representative of the UK population.

Further evidence of high public support for this ask comes from a petition that was circulated in 2020. This widely publicised petition called for the UK government to safeguard "the UK's high standards of food production in future trade agreements" (National Farmers' Union 2021b). This petition received over one million signatures. Notably, this petition had a broad focus, encompassing not only animal welfare but also food safety and sustainability.

Overall, the evidence strongly suggests that public support for this ask is high.

SUPPORT FROM MEMBERS OF PARLIAMENT (MPs)

This ask has been debated in Parliament a number of times. In July 2020, the

House of Commons debated adding a clause to the Trade Bill that would have implemented this ask. Specifically, the clause would have required the UK's trade agreements to only allow the import of goods that meet the UK's standards in animal welfare (as well as other areas). The House of Commons rejected this clause. This vote was essentially made along party lines. 337 MPs voted against this clause, including almost every Conservative MP. 251 MPs voted for this clause, including all MPs from Labour and the SNP, and most MPs from minor parties (UK Parliament 2020c).

In September 2020, the House of Lords introduced an amendment to the Agriculture Bill. This amendment would have required the UK's imports of food and agricultural products to meet domestic standards, including in animal welfare. 307 Lords supported the amendment, including all Lords from Labour and the Liberal Democrats. 212 Lords opposed the amendment, including most Lords from the Conservatives. There were a few miscellaneous Lords on either side (UK Parliament 2020b).

The House of Commons rejected this clause. This vote was also along party lines. 332 MPs voted against this clause, including most Conservative MPs. 279 MPs voted for this clause, including all MPs from Labour and the SNP, and most MPs from minor parties (UK Parliament 2020a).

Subsequently, in January 2021 the House of Lords introduced a similar amendment to the Trade Bill. This amendment was a softer version of the previous amendments, and would allow Parliament to scrutinise whether trade agreements met UK's standards of animal welfare and other areas. This amendment was also rejected by the House of Commons, along similar party lines to the votes described above (UK Parliament 2021b, [c] 2021).

A clear pattern emerges from these debates. The House of Lords supports this ask, but the House of Commons, with a Conservative majority, is opposed. This ask has the support of many MPs, particularly from Labour, SNP, Liberal Democrats, and minor parties. However, this support has not been sufficient for this ask to succeed in Parliament while there is a Conservative majority in the House of Commons.

This suggests that future campaign efforts should focus on Conservative MPs.

GOVERNMENT AND ITS DEPARTMENTS

The Conservative Party and its representatives in senior positions in government have stated that protecting the UK's animal welfare standards is a high priority. The manifesto of the Conservative Party (2019) contained a commitment not to compromise on animal welfare standards in trade negotiations. Likewise, the Right Honourable Liz Truss MP - Secretary of State for International Trade at the time - appears to have made a similar commitment. In Parliament in 2021, she stated that "in every trade deal we sign ... we will not expose our farmers to unfair competition" (UK Parliament 2021a).

However, the government appears to be strongly motivated to secure trade agreements, likely driven by domestic pressure to deliver on promises made prior to Brexit. Protecting animal welfare standards during trade agreements appears to be a low priority for the government. It has been claimed that the UK-Australia trade agreement

breaks this commitment by allowing the imports of lower-welfare meat and animal products (Compassion in World Farming 2021; Harvey 2021).

The views of particular government departments may differ. There have been suggestions in the media that Defra (Department for Environment, Food and Rural Affairs) is more supportive of this ask than DIT (Department for International Trade). For example, media reports have suggested that Defra was unsatisfied with the UK-Australia trade agreement (Pullman 2021). Separately, Defra proposed legislation that would allow the imports of lower-welfare products to be restricted via secondary legislation, but DIT was not supportive and this proposal was rejected (Casalicchio 2021).

FARMING INDUSTRY

This ask has the benefit, uncommon among animal asks, of having widespread support among the UK farming industry. This ask would mean that UK products are only competing with overseas products that are produced to equivalent standards. This would make it easier for UK farmers to compete in the domestic market, thus

improving UK farmers' economic prospects.

To illustrate, a report by the House of Lords (2017) concluded that "there is cross-sector support for maintaining high levels of farm animal welfare after Brexit." Indeed, the online petition mentioned above was created and circulated by the National Farmers' Union (2021b). And in response to the UK-Australia trade agreement, the NFU expressed disappointment at what the deal means for UK farmers. Animal welfare was one of the key points of contention (National Farmers' Union 2021a). As such, it is likely that this ask would be widely supported by UK farmers.

NON-GOVERNMENTAL ORGANISATIONS

Beyond animal advocacy organisations, this ask is likely to gain support from many non-governmental organisations. Since the UK's trade agreements also affect other cause areas like the environment, labour rights, and social justice, organisations from these areas are similarly calling for further scrutiny of, and restrictions on, trade agreements. For example, in December 2021, an open letter advocating for further

scrutiny of the UK-Australia trade agreement was sent to the Secretary of State for International Trade. This letter was signed by 16 organisations working in environmental advocacy and social justice (Bergan et al. 2021). Therefore, it is likely that such organisations could provide further support to a campaign for this ask.

Of course, some stakeholders have already advocated for this ask without achieving the desired government action. This is evidence against the idea that this ask is tractable. Nevertheless, there are avenues by which this ask could still be implemented (see below, "Expert Interviews").

ENFORCEMENT

The Swiss Parliament (2019), as part of their justification for rejecting this ask, claimed that a ban on lower-welfare imports is very difficult and resource-intensive to enforce. To successfully enforce a ban on lower-welfare imports, the UK government must monitor imports and penalise non-compliance. Given the immense number of existing regulations on imports that are enforced and penalised at the border, this task is comparatively trivial. This enforcement could also involve penalising UK

companies that sell lower-welfare imports, as an alternative to directly penalising overseas companies. Thus, corporations would be motivated to monitor the standards of their imports.

The process of deciding on and implementing a set of standards is very similar to trade policies in other areas, such as labour rights and greenhouse gas emissions. A current example comes from the EU, which is designing a policy to increase the price of imports with high greenhouse gas emissions (European Commission 2019). Although this policy is indeed complex to implement (Kuusi et al. 2020), it shows that a jurisdiction can design a policy that restricts or bans imports based on a nuanced criterion. We believe that a policy focused on animal welfare would be similarly complex, but feasible, to implement.

PROGRESS OF TRADE AGREEMENTS

Since leaving the EU, the UK has concluded three trade agreements - with Japan, with the EU, and with Australia. The UK is currently negotiating many more trade agreements.

(There are also a number of trade agreements that are essentially rollovers of the agreements from when the UK was part of the EU. Since these are mostly intended to be temporary, we will not discuss them here.)

Our cost-effectiveness analysis revealed that, despite the fact that agreements have been signed with some important trade partners, this ask is likely to be highly effective even if it does not apply to imports from those partners (see section "Cost-Effectiveness Analysis" below). Also, trade agreements generally take several years to negotiate and sign (Freund and McDaniel 2016; Moser and Rose 2012). For these reasons, we believe that there is likely to be scope to campaign on this ask for several years to come - or even longer, if the ask is implemented as a blanket ban across all trading partners, including those covered by trade agreements.

TRADE AGREEMENT WITH JAPAN (IN EFFECT)

The trade agreement between the UK and Japan came into effect on 31 December 2020. The agreement contains some minor provisions on animal welfare: the two parties agree to cooperate on matters of animal welfare; and the two parties are allowed to establish a working group to exchange information and expertise on animal welfare (UK Government 2020). While Japan has very low farm animal welfare standards, the UK imports an extremely small amount of meat or animal products from Japan. For this reason, the UK-Japan trade agreement has low relevance for this ask.

TRADE AGREEMENT WITH THE EU (IN EFFECT)

The trade agreement between the UK and the EU came into effect on 1 May 2021. The agreement contains some provisions on animal welfare, including that:

- The agreement recognises animal sentience;
- The two parties agree to cooperate on promoting and implementing

the best possible animal welfare practices

- The two parties agree to cooperate on animal welfare research
- The two parties agree to exchange information and expertise on animal welfare (UK Government 2021b).

The EU produces 72% of agricultural products imported by the UK, which means that this agreement is, by far, the largest in terms of numbers of animals out of all UK trade agreements (US Department of Agriculture 2021). Animal welfare standards are very similar in the UK and the EU (Compassion in World Farming 2021).

TRADE AGREEMENT WITH AUSTRALIA (SIGNED)

The trade agreement between the UK and Australia was signed on 17 December 2021, and is awaiting ratification by both countries. The agreement contains some provisions on animal welfare: the agreement recognises animal sentience; the parties express support for high animal welfare laws; the two parties agree to cooperate with knowledge and expertise on animal welfare; and the two parties will establish a Joint Working Group on

animal welfare (UK Government 2021a).

The agreement allows for a major increase in imports of Australian meat into the UK, although this would require Australia to scale up its production over time (Trade & Animal Welfare Coalition 2021b). Meat and animal products in Australia are produced to lower welfare standards, and for lower costs, than in the UK (Loeb 2021; Trade & Animal Welfare Coalition 2021b).

TRADE AGREEMENT WITH THE US (UNDER NEGOTIATION)

A trade agreement between the UK and the US is currently under negotiation. Negotiations have been delayed because the US intends to focus on domestic issues in the near future (Morales and Martin 2021). This may present a window of opportunity for animal advocacy organisations to promote this ask with the UK government.

We highlight the trade agreement with the US because, outside of EU countries, the US accounts for the biggest share of agricultural products imported by the UK. However, this share is relatively small in absolute

terms, at 3.9% overall (US Department of Agriculture 2021). Animal welfare standards are lower in the US than in the UK (Compassion in World Farming 2021). Meanwhile, it appears that the US would like the UK to lower its animal welfare standards, which may make the outcome of the UK-US trade agreement particularly impactful for animals (UK Parliament 2020c).

OTHER TRADE AGREEMENTS

There are several future trade agreements that may be particularly relevant for animal advocacy organisations.

The first is a potential trade agreement between the UK and the Mercosur countries (Argentina, Brazil, Paraguay, and Uruguay). Agricultural imports from all four Mercosur countries combined appear to be comparable in volume to those from the US (US Department of Agriculture 2021). Also, since the EU-Mercosur trade agreement allows for lower tariffs for higher-welfare eggs (see below, "Legal hurdles"), it is possible that the Mercosur countries would be open to a similar clause in a trade agreement with the UK. However, a UK-Mercosur agreement may be unlikely in the near

future, given that there are potential diplomatic hurdles and that other trade agreements are a greater priority for the UK (Hagemejer et al. 2021).

The second is the upcoming trade agreement between the UK and New Zealand. This agreement is particularly relevant because around 70% of the UK's imports of sheep meat come from New Zealand (British Meat Processors Association, n.d.). However, the UK and New Zealand have already reached an agreement in principle, with animal welfare language similar to that in the agreement with Australia (UK Government 2021c).

Third is the upcoming trade agreement between the UK and Greenland (UK Government 2022). The UK imports a high volume of finfish and shellfish products from Greenland. However, this ask can only affect the UK-Greenland trade agreement if this ask applies to the deal *and* the UK also grants legal protections to finfish and/or shellfish. Nevertheless, if this ask does apply to the UK-Greenland trade agreement, it is possible for the UK to grant legal protections to finfish and/or shellfish in the future (see "Cost-Effectiveness Analysis" section below).

LEGAL HURDLES

The biggest question facing this ask is whether it is legal to restrict trade based on animal welfare under international law (House of Lords 2017). It is legal to restrict lower-welfare trade under a bilateral agreement or multilateral treaty. However, where trade does not occur under the terms of an agreement or treaty, the picture is more nuanced.

The first legal question is whether two meat products or animal products that are produced under different welfare conditions are considered 'like products'. If they are *not* considered 'like products', then it is legal under international trade law to discriminate between them (Ghislain 2021). This could involve a trade ban or differential tariffs. While there are some tentative suggestions that this is the case, the question has not been resolved conclusively in case law (Ghislain 2021).

Even if two meat products or animal products that are produced under different welfare conditions *are* considered 'like products', it may still be possible to discriminate between them. Here, the relevant piece of international law is the General Agreement on Tariffs and Trade (GATT). This treaty is a

multilateral agreement enforced under the framework of the World Trade Organisation (WTO). The GATT was designed to promote trade by reducing tariffs and other trade restrictions. The UK has many obligations under the GATT, and there are many ways that trade restrictions based on animal welfare could violate these obligations (Blattner 2019). This would suggest that restricting trade based on animal welfare is against international law.

However, the GATT also includes some exceptions, which allow countries to restrict trade under particular circumstances. The most relevant of these exceptions is Article XX(a) of the GATT, which enables countries to adopt measures "necessary to protect public morals".

In 1998, there was an eruption of public debate in the EU about seal hunting. This debate caused the EU to place a ban on selling seals and seal products in the EU. The ban, which was primarily motivated by the desire to protect these animals, was challenged by Canada and Norway at the WTO. However, it was ruled that protecting animals did fall

under the definition of 'public morals' (Blattner 2019).

This case law indicates that trade restrictions based on animal welfare can indeed be justified under Article XX(a) of the GATT (Blattner 2019; Offor and Walter 2017). The analysis by Offor and Walter (2017) supports this conclusion. They found a consensus among scholars that, given the outcome of the *Seals* case, GATT Article XX(a) can indeed be used as justification for restricting trade on animal welfare grounds. Such restrictions, to be justified, must also meet particular criteria. For example, the restriction must be necessary to achieve the desired animal welfare objective, must refer to animal welfare within the relevant legal document, must apply to all exporting countries equally, and must be the least restrictive option available to achieve the desired result (Offor and Walter 2017). However, it should be noted that the *Seals* case focused on wild animals. The ability to use the 'public morals' exemption to protect animal welfare has not yet been confirmed by case law in the context of farmed animals (Ghislain 2021).

Indeed, an exemption under GATT Article XX(a) is cited as the most

promising avenue by animal advocacy organisations who support a ban on lower-welfare products (Trade & Animal Welfare Coalition 2021b). An EU official, speaking anonymously and in the context of imports into the EU, claimed that trade restrictions based on animal welfare could be designed to be consistent with WTO rules (Foote 2021). The EU currently restricts the import of meat from animals slaughtered to lower welfare standards, a restriction that has not been challenged at the WTO (Cox 2020). Importantly, the UK House of Lords (2017) notes that some doubt remains around the legality of a trade restriction based on animal welfare given this remains untested at the WTO.

There is only one other trade agreement that includes a concrete regulation based on animal welfare. In 2019, the EU and the Mercosur countries (Argentina, Brazil, Paraguay, and Uruguay) reached a trade agreement that contains a clause requiring eggs to be produced to EU standards of animal welfare in order to benefit from zero tariffs (Cox 2020; European Commission 2019). Importantly, this agreement is at the stage of agreement-in-principle, meaning that the final text has not yet

been published or implemented. There are also several trade agreements that pledge cooperation on matters of animal welfare (such as the EU's agreements with Chile, with Mexico, and with South Korea), but these do not contain any concrete regulations of trade.

Even if a trade ban on lower-welfare imports is legal, governments may use the potential legal difficulties as justification not to pursue such a ban (e.g. The Swiss Parliament 2019).

To summarise the legal hurdles at the WTO, there are four key scenarios:

1. The UK government is worried about the risk from the WTO and never implements this ask. However, it appears that the UK government is unlikely to be concerned about this legal risk (see below, "Expert Interviews").
2. The UK government implements this ask, and a WTO member country threatens to challenge the UK government. In response, the UK government changes this ask to a weaker version.
3. The UK government implements this ask, and a WTO member country challenges the UK government. The challenge is unsuccessful. This would set a new legal precedent, enabling

other countries to implement this ask also.

4. The UK government implements this ask, and a WTO member country challenges the UK government. The challenge is successful. The UK withdraws the ask and pays some legal fees. In this case, the animal advocacy movement would be no worse off, other than some time and resources that had been spent on campaigning for this ask.

The UK government does not appear worried about the WTO risk, and most legal analyses have concluded that this ask would survive a challenge at the WTO (Offor and Walter 2017). Therefore, the most likely scenarios from this list are number 2 and 3, both of which would result in meaningful, long-term benefits for animals.

Separate to this WTO route, free-trade agreements generally contain dispute mechanisms. If the UK implements this ask as a blanket ban across all trade partners, there is a chance that such a ban would be challenged via these dispute mechanisms.

EXPERT INTERVIEWS

To complement our review of the evidence, we conducted interviews with multiple people who have expertise in trade policy and animal advocacy. These experts work across a wide range of positions within government, academia, and animal advocacy.

In general, the experts believed that this ask would be compliant with international trade law under the GATT (see above, 'Legal Hurdles'). This was particularly true for the weaker forms of the ask (e.g. requiring imports to meet a set of core welfare standards, rather than all UK welfare standards). Experts also stated that the government is unlikely to be concerned by the small risk of non-compliance with this law.

Overall, the experts expressed concerns about the political will for this ask due to the restrictions this would place on trade negotiations. The current UK Government has an interest in making Brexit appear successful, which requires trade deals to be secured. Due to this, animal welfare is a much lower priority for the government, making it highly unlikely that the government would risk the success of trade negotiations for the sake of animal welfare. There have also

been reports that Defra is more supportive of this ask than the Department of International Trade (Casalicchio 2021), though the Secretary of State for Trade has changed since then.

At the upcoming UK general election, there is a chance that the Conservative party will concede government to the Labour party (date unknown, but likely 2023 or 2024). One expert indicated that a Labour government would have no need to make Brexit look successful, so the agenda of such a government would be more malleable. Also, historically, Labour MPs have always voted in favour of this ask in Parliament. However, this ask is likely to be a low priority even for a Labour government. Any government is also likely to have limited attention for animal welfare given the COVID-19 pandemic and the current war in Ukraine.

Experts expressed optimism that further effort could increase the tractability of this ask. They also highlighted some useful strategies. There is a window now (mid 2022, the time of writing) to campaign for the major political parties to write this ask into their manifestos for

the upcoming general election. In addition, many farmers are supportive of this ask, as this ask is likely to protect domestic farmers from international competition. The government may pay greater attention to the demands of the farming community. Therefore, it may help to campaign in a coalition with representatives of the farming community, such as the National Farmers Union.

Lastly, one expert spoke about a future Convention on Animal Protection (Blackaby et al. 2021). This is another promising avenue to secure protection for animals in trade. There is a group of lawyers and legal experts currently advocating for the establishment of a Convention by a core group of countries.

COST EFFECTIVENESS ANALYSIS

This section summarises our cost-effectiveness analysis (CEA), which weighs organisational costs against the welfare benefits of the ask. However, some parameters are subject to high uncertainty, and CEAs generally face a number of limitations (Šimčikas 2019a; Holden 2016). The results of this CEA should be taken in light of these uncertainties and limitations.

We consider four scenarios in our CEA. Scenarios 2, 3, and 4 provide the most realistic estimates of the overall impact of this ask. Scenario 1 provides a baseline estimate of species composition.

- In Scenario 1, we assume that this ask affects imports from all countries. This scenario is unrealistically high in terms of absolute numbers. However, as this scenario does not depend on classifying the countries by farm animal welfare, it can produce a useful baseline estimate of species composition.
- In Scenario 2, we assume that this ask only affects imports from countries with lower farm animal welfare than the UK. This scenario uses scores from the Animal Protection Index by World Animal Protection (2020a). Some countries are not included in that Index. For these countries, we calculated scores on the basis of GDP per capita. This scenario is more realistic in terms of absolute numbers. However, the scenario is unreliable when it comes to species composition.
- In Scenario 3, we assume that this ask affects imports from all countries *other than* Australia, New Zealand, and the European Union. These are the three trading partners with which the UK has already signed trade agreements. This scenario provides insight into how effective this ask might be if it does not apply to those trading partners.
- In Scenario 4, we assume that this ask only affects imports from countries with lower farm animal welfare than the UK, as well as *excluding* Australia, New Zealand, and the European Union. In other words, we consider the countries that meet the criteria for inclusion in both Scenario 2 and Scenario 3.

In the CEA, we calculated the welfare benefits to each group of animals, measured in terms of animal-lives³ improved. In absolute terms, the number of animal-lives improved per dollar is reasonably high - and high enough for this ask to be a priority (Scenarios 2-4). In terms of species composition, almost all of the animal-lives improved came from chickens and other birds farmed for meat (71-91%, depending on the scenario). The next largest group was sheep farmed for wool (7-12%). In Scenario 1 only, there were also large numbers of pigs (7%) and chickens farmed for eggs (7%) who benefitted.

In all four scenarios, the benefits were dominated by chickens farmed for meat. In Scenarios 2-4, the overwhelming majority of this meat was imported in the form of canned chicken from Thailand and, to a lesser extent, Brazil.

This suggests that focusing the ask on chickens (and perhaps campaigning on the basis of welfare conditions in Thailand specifically) may be a way to make the ask more attractive to the government while also retaining the majority of the benefits for animals. Indeed, the chicken imported from

Thailand appears to have been produced in Thailand. Thailand's stated aim is to be the "kitchen of the world", and the country exports chickens to many countries (Ipsos Business Consulting 2013). The highest volumes go to Japan and the EU. Since the EU has also been considering this ask, there is a chance that the EU and the UK could both implement restrictions on the imports of lower-welfare chicken products. Speculatively, this could encourage Thailand's chicken industry to improve chicken welfare to adapt to these new restrictions by the major importers that are the EU and the UK. Although Thailand's farmed animal standards are low, the welfare standards for chickens do seem to have improved in recent years (World Animal Protection 2020b; Johnson 2018). A campaign that adopts this strategy should first research the specific ways in which Thailand's chicken welfare standards differ from those in the UK.

Conversely, this strategy would forego the benefits that arise from future welfare gains for non-chicken animals. For example, welfare improvements for pigs or fish would not be automatically accompanied by a requirement for

³ Animal-lives equals the number of animals of a group of animals multiplied by the average lifespan of animals within that group.

imports to also meet those improvements. This strategy may also have less support among farmers who farm other species.

Notably, we did not include fish in the main CEA. Given that fish are given very limited legal protections, it is unlikely that a ban on lower-welfare products would benefit fish in the short-term. However, such a ban may benefit fish if they are given more legal protections in the future. This is most likely for farmed fish, as there are several ongoing campaigns to improve welfare standards for farmed fish. For this reason, considering farmed fish is one way to understand the potential long-term benefits of this ask. In the CEA, including farmed fish multiplies the number of animals affected by between two and six. This suggests that this ask, if it applies to fish at a future point, may have long-term benefits that substantially exceed the short-term benefits.

There are some key challenges in modelling this ask in a CEA. Firstly, it is very difficult to predict the UK's future trade patterns. We assumed that the UK's existing trade patterns will continue into the future. However, given

that the UK is currently negotiating numerous trade agreements, this assumption is probably unrealistic. Secondly, we only have a tentative idea of which countries have lower animal welfare standards than the UK. This makes it difficult to understand how many animals would be affected by this ask. Thirdly, the trade patterns of Northern Ireland are likely to be different, given the effects of the Northern Ireland Protocol. Furthermore, in the CEA, we have assumed that different versions of the ask apply to different sets of countries. But it is also possible for different versions of the ask to apply to different welfare standards (e.g. a core set of welfare standards rather than all UK domestic welfare standards), and there is insufficient data to capture this in our CEA. And lastly, due to limitations of the available data, there remains uncertainty around the number of animals imported into the UK.

ALTERNATIVE POLICIES

In this report, we have mostly described this ask as a complete ban on any imported food or agricultural product that was not produced to UK standards or better. However, there are several alternative asks that may improve the welfare standards of imports while also being more politically tractable.

A MULTILATERAL AGREEMENT ON WELFARE STANDARDS

One alternative to this ask involves a multilateral agreement on animal welfare standards. A multilateral agreement involves multiple countries voluntarily agreeing to the same set of standards. In the context of animal welfare, this may involve agreeing to a particular set of minimum welfare standards in agricultural production (Grethe 2007). This agreement would likely take the form of a broad umbrella treaty, which can then be used to design and adopt more specific protocols (Favre 2016).

Such an agreement would give more credibility and political leverage to animal advocacy efforts in countries that have ratified the agreement. It would also help to avoid incentives to reduce

animal welfare standards. Furthermore, there is a chance that this alternative would be politically palatable for the UK government. This would allow the government to show leadership in animal protection - honouring their manifesto commitment - without actually restricting their negotiations in trade agreements. This alternative would also be very beneficial for the broader animal advocacy movement, making future animal welfare gains more tractable in many countries (Favre 2016).

There are some potential risks to a multilateral treaty on animal welfare. Firstly, the process of establishing such a treaty could be captured by the animal agriculture industry (Favre 2016). This regulatory capture could increase the reputation and power of the industry while bringing minimal or negligible benefits to animals' lives (Goodfellow 2016; Favre 2016; Duffield 2020). Secondly, a treaty might lock in a welfarist mindset (as opposed to a rights-oriented mindset) to animal protection among the global community. The merits of these two mindsets are heavily debated by animal advocates (e.g. Francione and Garner 2010).

Nevertheless, given that this alternative is potentially tractable and may bring widespread benefit to animals globally, we are particularly enthusiastic about this alternative.

There have been previous attempts to establish multilateral agreements on animal welfare. One proposed agreement is the International Convention for the Protection of Animals. This Convention, and the efforts made to bring it to the attention of policymakers, are discussed by Favre (2016).

A more recent attempt is the Convention on Animal Protection⁴. This Convention was drafted by a group of lawyers and academics following a resolution by the American Bar Association (2021) urging countries to develop a multilateral agreement for the protection of animals. The draft text of the Convention recognises animals as sentient beings whose welfare interests and wellbeing must be protected from unnecessary suffering. The paragraph most relevant to animals used for agriculture reads:

"The Contracting Parties shall take all necessary steps to ensure that

commercial animals are provided an appropriate species-specific environment and the necessary care for their well-being, and to prevent cruelty to or unnecessary suffering of commercial animals."

While this is a vague commitment, the Convention would facilitate the adoption of specific protocols that provide more concrete benefits for animals (Favre 2016). Similarly, this paragraph provides a commitment that can be leveraged by animal advocacy organisations in campaigning and lobbying governments for concrete animal welfare improvements.

PREFERENTIAL TARIFFS

Another alternative to an import ban is to use preferential tariffs. This involves placing lower tariffs on imports that do meet the UK's animal welfare standards than on those imports that do not. For this alternative to succeed, the tariffs on lower-welfare imports would need to be expensive enough to discourage these imports (Cox 2020).

Preferential tariffs are a more moderate ask than an import ban. Preferential tariffs allow for lower-welfare imports if

⁴ Further information about the Convention is available on its website: <https://www.conventiononanimalprotection.org/>

an exporting company is willing to pay the higher tariffs. While preferential tariffs still allow lower-welfare products to enter the UK market, this is a way to limit the market reach of lower-welfare products. Therefore, preferential tariffs may improve the lives of fewer animals than an import ban. However, it is possible that preferential tariffs may be more politically palatable to the UK government. The key difficulties of preferential tariffs are the additional bureaucratic costs in establishing them and the potential of conflicting with WTO laws (Grethe 2007). Additionally, tariffs bring the risk of being lowered over time, which may reduce the benefits that this alternative can bring to animals. Given these arguments, we believe that preferential tariffs are still likely to be a reasonably impactful ask if a full import ban is not politically tractable.

LABELLING

A further alternative is food labelling. This would involve labelling all meat and animal products sold in the UK, including imports, so that consumers can determine the welfare standards under which any particular product was produced. These labels can be voluntary - producers that do meet animal welfare

standards are entitled to use a positive label - or obligatory - producers that do not meet animal welfare standards must use a negative label (Grethe 2007). Food labels, if appropriately designed and implemented, are potentially legal under WTO rules (Offor 2020; Grethe 2007).

Food labelling is generally seen as an appropriate policy if the goal is to address consumer concerns (Wilkinson 2020; Offor 2020). This is the policy that was preferred by the Federal Council in Switzerland when it debated the topic of lower-welfare imports (The Swiss Parliament 2019). However, in the Swiss context, experts have expressed scepticism that food labelling has had any effect (Bridgwater, Gittins, and Odene 2022). Also, consumer concerns are not the primary problem with importing lower-welfare food since the biggest costs are incurred by the animals who are raised for food. Lower-welfare imports are also opposed by UK food producers.

The alternative of food labelling would mean that any benefits to animals are entirely dependent on public purchasing behaviour. This would reduce the impact of this ask for animals. On top of this, labelling food with animal welfare

standards is already being considered by the UK government, with Defra leading a public consultation (Animal Welfare Market Interventions Team 2021). Therefore, we believe that food labelling is a poor alternative to an import ban.

RETAILER ACTION

The final alternative to an import ban is retailer action. Retailer action involves supermarkets and other stores refusing to stock particular products. A number of UK supermarkets have already pledged not to sell chlorine-washed chicken, and some have also pledged not to sell hormone-fed beef (Staples and Bergman 2020).

Compared to an import ban, retailer action is limited. Retailer action depends on the support and action of numerous companies.

Also, retail action is likely to focus on products that face substantial public opposition or a targeted campaign. This means that retailer action is probably only able to prevent a handful of practices harmful to animals. This is far less comprehensive than an import ban, which would likely prevent any harmful practices that are banned in the UK. Lastly, retailer action faces key hurdles to its success, such as the failure to follow through on a pledge (Sarek 2019; Šimčikas 2019b).

CRUCIAL CONSIDERATIONS

WILL FURTHER EFFORT HELP THIS ASK?

One of the most crucial considerations for this ask is the value of additional advocacy efforts in this area. In 2020, a report on this topic found that experts are unenthusiastic about a new charity working in this area unless it can bring something new to advocacy efforts (Cox 2020). However, that report was written in the context of forming a new charity committed to just this ask and it may still be worthwhile for existing organisations to commit resources towards this ask. Our expert interviews were indeed supportive of committing additional resources towards this ask (see above, "Expert Interviews").

There are already a few animal advocacy organisations working on this ask in the UK. These organisations are largely concentrated under two umbrella groups: Eurogroup for Animals and the Trade & Animal Welfare Coalition. Together, these umbrella groups represent 14 organisations that have expressed support for restricting trade on lower-welfare imports. (We are also aware of at least one organisation working, more broadly, on trade and animal welfare in the UK.) However,

while all of these organisations have expressed support for this ask, only a handful have actually committed significant resources to a campaign on this ask. Previous efforts have also failed to achieve this ask. Therefore, we believe that there is more space for further effort than the figure of "14 organisations" would initially suggest.

A critical question is how best to focus new effort. Useful campaigns could involve securing commitments from parties in their manifestos for the upcoming general election, building support among Conservative MPs, and collaborating with the farming community.

The biggest challenges with this ask are the difficulties in seeking an import ban by lobbying the government. We have spoken with some people who are enthusiastic about pursuing an import ban through corporate campaigns. This could involve identifying the companies that are responsible for importing large quantities of lower-welfare animal products into the UK - perhaps chicken from Thailand specifically - and encouraging those companies to

increase the animal welfare standards of their imports.

IMPACTS ON HUMAN WELLBEING

There are a number of ways that this ask may affect human wellbeing. In countries with which the UK trades, this ask may lead to changes in employment patterns and economic opportunities. Such changes may have profound effects, positive and/or negative, on the lives of people. Since there is a correlation between per-capita income and farm animal welfare across countries, this ask risks moving employment from lower-income countries to higher-income countries. More broadly, animal advocacy has a history of being used to oppress people who undertake practices that do not conform to mainstream Western ideals (Feliz 2019; Blattner 2019). Given this, advocating against lower-welfare practices overseas may reinforce harmful racial prejudices (Kymlicka and Donaldson 2014; Feliz 2017). This is a particular risk with this ask, as most of the impact comes from improving the lives of chickens raised for meat and the majority of chicken meat imports currently come from Thailand and Brazil.

Furthermore, this ask may affect human wellbeing in the UK. Specifically, there has been concern that this ask could cause an increase in food prices (Wilkinson 2020). If a price increase does occur - although we believe such an increase to be unlikely - disadvantaged socio-economic groups would likely be most drastically harmed (Kehlbacher et al. 2016).

INCLUDING OTHER CAUSE AREAS IN THE ASK

When campaigning for this ask, it is also possible to include improvements to causes other than animal welfare. In other words, this ask could also include a restriction on imports that do not meet the UK's standards for environmental sustainability, social justice, food safety, and other cause areas. Debates in Parliament about this ask have generally considered multiple cause areas, not just animal welfare (e.g. UK Parliament 2021b). This may improve public support but may also make this ask more difficult for the government to accept, and more difficult to defend at the WTO.

SMALL-ANIMAL REPLACEMENT PROBLEM

The small-animal replacement problem (SARP) is a known concern within many policies that change the prices of meat (Mathur 2022; Springlea 2022). When the price of meat increases, consumers may reduce their consumption of expensive meat (e.g., meat from cows and sheep) and increase their consumption of cheaper meat (e.g., meat from chickens and fish). This is particularly concerning given that chickens and fish tend to be farmed under conditions more harmful for their welfare than cows and sheep (Charity Entrepreneurship 2018; Animal Charity Evaluators 2020). The result is that the total number of animals consumed, and the overall amount of animal suffering, may increase (Mathur 2022; Springlea 2022).

While Cox (2020) concluded that the SARP is unlikely to be an issue with this ask, there have been concerns that this ask could cause the price of food to increase (Wilkinson 2020). A price increase would indicate that this ask has a chance of causing the SARP. However, we have seen no formal analysis on the effect of this ask on food prices or on the relative consumption of different

types of meat. Also, we expect that the price of chicken would increase by a higher proportion than the price of beef, which would move consumption in the opposite direction of the SARP - in other words, consuming fewer animals. Given the scarcity of evidence that this ask may cause the SARP, and the fact that this ask has large, positive effects on animal welfare, we do not believe that the SARP is a major concern for this ask.

CONCLUSION

Given the evidence documented in this report, we believe that requiring imports to meet UK animal welfare standards is very likely to positively impact the lives of many animals. We recommend that UK organisations consider campaigning for this ask.

The biggest remaining uncertainty is what proportion of imports would be affected. This, in turn, determines how many animals' lives would be improved. Nevertheless, in the scenarios we modelled, it appears that the number of animals affected is sufficiently high for this ask to be a priority.

We believe that further effort for this ask should focus on securing commitments from parties in their manifestos for the upcoming general election,

collaborating with the farming community, and possibly building support among Conservative MPs. For the first of these avenues, there is a window of opportunity now (at the time of writing, mid-2022). Corporate campaigns may offer a further avenue to achieve this ask.

Most of the impact appears to come from processed chicken meat imported from Thailand and, to a lesser extent, Brazil. An organisation campaigning for this ask could focus awareness on conditions in those countries. We are most enthusiastic about a total ban on lower-welfare imports. However, preferential tariffs for higher-welfare imports may be a useful alternative, and a multilateral agreement on animal welfare may also be worth exploring.

BIBLIOGRAPHY

American Bar Association. 2021. “Resolution 101C.” American Bar Association. <https://www.americanbar.org/content/dam/aba/directories/policy/midyear-2021/101c-midyear-2021.pdf>.

Animal Charity Evaluators. 2020. “Farmed Fish Welfare Report.” Animal Charity Evaluators. 2020. <https://animalcharityevaluators.org/research/other-topics/farmed-fish-welfare-report/#full-report>.

Animal Welfare Market Interventions Team. 2021. “Call for Evidence - Labelling for Animal Welfare.” Department for Environment, Food & Rural Affairs. 2021. <https://consult.defra.gov.uk/animal-welfare-market-interventions-and-labelling/labelling-for-animal-welfare/>.

Bergan, Ruth, Nick Dearden, Sarah Hirom, Asad Rehman, Doug Parr, David Bowles, Kath Dalmney, et al. Letter to Rt Hon Anne-Marie Mp. 2021, December 17, 2021. <https://www.tjm.org.uk/documents/briefings/Letter-Trevelyan-AUS-UK-FTA-171221.pdf>.

Blackaby, Nigel, Daina Bray, Nicolas Cordoba, David Favre, Rosario Galardi, Laurie Morgan, Rajesh Reddy, and Joan Schaffner. 2021. “Convention on Animal Protection for Public Health, Animal Welfare, and the Environment.” Draft 10/08/2021. Convention on Animal Protection. [https://assets.website-files.com/60fe75aa41780d45cc7a2453/616da1bc556a4c372e15419a_Convention%20on%20Animal%20Protection%20\(Draft%2010.18.2021\)v2.pdf](https://assets.website-files.com/60fe75aa41780d45cc7a2453/616da1bc556a4c372e15419a_Convention%20on%20Animal%20Protection%20(Draft%2010.18.2021)v2.pdf).

Blattner, Charlotte E. 2019. *Protecting Animals Within and Across Borders: Extraterritorial Jurisdiction and the Challenges of Globalization*. Oxford University Press.

Bridgwater, George, Jamie Gittins, and Amy Odene. 2022. “Cruel Products Import Ban.” Animal Ask.

British Guild of Agricultural Journalists. 2021. “British Public Believes Imports Should Meet the UK’s High Standards, Survey Reveals.” British Guild of Agricultural Journalists. 2021. <https://www.gaj.org.uk/article/british-public-believes-imports-should-meet-uk%E2%80%99s-high-standards-survey-reveals>.

British Meat Processors Association. n.d. “Sheepmeat.” British Meat Processors Association. <https://britishmeatindustry.org/industry/imports-exports/sheepmeat/>.

Casalicchio, Emilio. 2021. “UK Trade Department Blocks Plan to Ban Food Made to Low Standards.” Politico. 2021. <https://www.politico.eu/article/former-uk-trade-minister-liz-truss-london-defra-animal-welfare/>.

Charity Entrepreneurship. 2018. “Small Animal Replacement Problem.” Charity Entrepreneurship. 2018. charityentrepreneurship.com/post/small-animal-replacement-problem.

Compassion in World Farming. 2021. “Trade and Animal Welfare.” Compassion in World Farming. 2021. <https://www.ciwf.org.uk/our-campaigns/other-campaigns/trade-and-animal-welfare/>.

Cox, V. 2020. “Animal Welfare and Trade.” Edited by K. Sarek and E. Hausen. Charity Entreprenuership.

Duffield, Danielle. 2020. “Reputation, Regulatory Capture, and Reform: The Case of New Zealand’s Bobby Calves.” *Animal Learning & Behavior* 26: 321. European Commission. 2019. “EU-Mercosur Trade Agreement: The Agreement in Principle and Its Texts.” European Commission. 2019. <https://trade.ec.europa.eu/doclib/press/index.cfm?id=2048>.

— — —. 2022. “Imports of Agricultural and Food Products – Applying EU Health and Environmental Standards (report).” European Commission. 2022. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13371-Imports-of-agricultural-and-food-products-applying-EU-health-and-environmental-standards-report_en.

Favre, David. 2016. “An International Treaty for Animal Welfare.” In *Animal Law and Welfare - International Perspectives*, edited by Deborah Cao and Steven White, 87–106. Cham: Springer International Publishing.

Feliz, Julia, ed. 2017. *Veganism in an Oppressive World*. Sanctuary Publishers.

— — —., ed. 2019. *Veganism of Color*. Sanctuary Publishers.

Foote, Natasha. 2021. “EU Official: Imposing Animal Welfare Standards on Imports Would Be WTO Compliant.” Euractiv. 2021. <https://www.euractiv.com/section/agriculture-food/news/eu-official-imposing-animal-welfare-standards-on-imports-would-be-wto-compliant/>.

Francione, Gary Lawrence, and Robert Garner. 2010. *The Animal Rights Debate: Abolition Or Regulation?* Columbia University Press.

Freund, Caroline, and Christine McDaniel. 2016. “How Long Does It Take to Conclude a Trade Agreement With the US?” Peterson Institute for International Economics. 2016. <https://www.piie.com/blogs/trade-investment-policy-watch/how-long-does-it-take-conclude-trade-agreement-us>.

Ghislain, Stephanie. 2021. “EU Trade and Fish Welfare.” Presented at the The Aquatic Life Conference. <https://www.youtube.com/watch?v=nJUK6znU9BQ>.

Goodfellow, Jed. 2016. “Regulatory Capture and the Welfare of Farm Animals in Australia.” In *Animal Law and Welfare - International Perspectives*, edited by Deborah Cao and Steven White, 195–235. Cham: Springer International Publishing.

Grethe, Harald. 2007. “High Animal Welfare Standards in the EU and International Trade--How to Prevent Potential ‘low Animal Welfare Havens’?” *Food Policy* 32 (3): 315–33.

Hagemejer, Jan, Andreas Maurer, Bettina Rudloff, Peter-Tobias Stoll, Stephen Woolcock, Andréia Costa Veira, Kristina Mensah, and Katarzyna Sidło. 2021. “Trade Aspects of the EU-Mercosur Association Agreement.” European Parliament. [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653650/EXPO_STU\(2021\)653650_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/653650/EXPO_STU(2021)653650_EN.pdf).

Harvey, Fiona. 2021. “UK Ministers Gain Power to Allow Lower-Standard Food Imports.” The Guardian. 2021. <https://www.theguardian.com/environment/2021/jan/19/uk-ministers-gain-power-to-allow-lower-standard-food-imports>.

Holden. 2016. “Some Considerations against More Investment in Cost-Effectiveness Estimates.” The GiveWell Blog. 2016. <https://blog.givewell.org/2011/11/04/some-considerations-against-more-investment-in-cost-effectiveness-estimates/>.

House of Lords. 2017. “Brexit: Farm Animal Welfare.” House of Lords: European Union Committee.

Ipsos Business Consulting. 2013. “Thailand’s Poultry Industry.” Ipsos Business Consulting. https://www.ipsos.com/sites/default/files/ct/publication/documents/2018-09/thailands_poultry_industry-sep2013.pdf.

Johnson, Ryan. 2018. “Thailand Highlights Its Poultry Welfare Standards.” The Poultry Site. 2018. <https://www.thepoultrysite.com/news/2018/05/thailand-highlights-its-poultry-welfare-standards>.

Kehlbacher, Ariane, Richard Tiffin, Adam Briggs, Mike Berners-Lee, and Peter Scarborough. 2016. “The Distributional and Nutritional Impacts and Mitigation Potential of Emission-Based Food Taxes in the UK.” *Climatic Change* 137 (1): 121–41.

Kuusi, Tero, Martin Björklund, Ville Kaitila, Kai Kokko, Markku Lehmus, Michael Mechling, Tuuli Oikarinen, Johanna Pohjola, Sampo Soimakallio, and Maria Wang. 2020. “Carbon Border Adjustment Mechanisms and Their Economic Impact on Finland and the EU.” Prime Minister’s Office. <https://julkaisut.valtioneuvosto.fi/handle/10024/162510>.

Kymlicka, Will, and Sue Donaldson. 2014. “Animal Rights, Multiculturalism, and the Left.” *Journal of Social Philosophy* 45 (1): 116–35.

Loeb, Josh. 2021. “Animal Welfare Concerns Following UK-Australia Trade Deal.” *VetRecord*, June. <https://doi.org/10.1002/vetr.00100014>.

Mathur, Maya B. 2022. “Ethical Drawbacks of Sustainable Meat Choices.” *Science* 375 (6587): 1362.

Morales, Alex, and Eric Martin. 2021. “U.K. Seeks to Trade With U.S. States With Broader Deal on Hold.” Bloomberg. 2021. <https://www.bloomberg.com/news/articles/2021-12-06/u-k-pursues-trade-with-individual-u-s-states-trade-chief-says>.

Moser, Christoph, and Andrew K. Rose. 2012. “Why Do Trade Negotiations Take so Long?” In *European Integration in a Global Economy*. Edward Elgar Publishing.

National Farmers’ Union. 2021a. “Minette Batters: The Detail of the UK’s Deal with Australia.” National Farmers’ Union. 2021. <https://www.nfuonline.com/updates-and-information/minette-batters-the-detail-of-the-uk-s-deal-with-australia/>.

National Farmers’ Union. 2021b. Countryside Online. 2021. <https://www.campaigns.nfuonline.com/page/56262/petition/1>.

Offor, Iyan. 2020. “Animals and the Impact of Trade Law and Policy: A Global Animal Law Question.” *Transnational Environmental Law* 9 (2): 239–62.

Offor, Iyan I. H., and Jan Walter. 2017. “GATT Article XX(a) Permits Otherwise Trade-Restrictive Animal Welfare Measures.” *Global Trade and Customs Journal*

12 (4). <https://kluwerlawonline.com/journalarticle/Global+Trade+and+Customs+Journal/12.4/GTCJ2017022>.

Pullman, Nina. 2021. “Retailers ‘to Protect Standards’ in Wake of Australia Trade Deal.” Wicked Leeks. 2021. <https://wickedleeks.riverford.co.uk/news/environment-ethics-animal-welfare/retailers-protect-standards-wake-australia-trade-deal>.

RSPCA. 2020. “RSPCA – Written Evidence (NZT0001).” UK Parliament. 2020. <https://committees.parliament.uk/writtenEvidence/9765/html/>.

Sarek, Karolina. 2019. “35 Independent Pieces of Evidence for Why New Corporate Campaigns Might (or Might Not) Work.” Effective Altruism Forum. 2019. <https://forum.effectivealtruism.org/posts/JWcNfLAJCxMPZCdCu/35-independent-pieces-of-evidence-for-why-new-corporate>.

Savanta ComRes. 2020a. “RSPCA, Animal Welfare Standards – August 2020.” Savanta ComRes. https://2sjjwunnql41ia7ki31qqub1-wpengine.netdna-ssl.com/wp-content/uploads/2020/08/RSPCA_Animal-welfare-standards-poll_Aug2020.pdf.

— — — . 2020b. “Unison, Meat Standards – January 2020.” Savanta ComRes. <https://2sjjwunnql41ia7ki31qqub1-wpengine.netdna-ssl.com/wp-content/uploads/2020/02/Final-Unison-Meat-Standards-Tables-270120-2c0d1h5.pdf>.

Šimčikas, S. 2019a. “List of Ways in Which Cost-Effectiveness Estimates Can Be Misleading.” Effective Altruism Forum. 2019. <https://forum.effectivealtruism.org/posts/zdAst6ezi45cChRi6/list-of-ways-in-which-cost-effectiveness-estimates-can-be>.

— — — . 2019b. “Will Companies Meet Their Animal Welfare Commitments?” Rethink Priorities. 2019. <https://rethinkpriorities.org/publications/will-companies-meet-their-animal-welfare-commitments>.

Springlea, Ren. 2022. “Meat Tax: Why Chickens Pay The Price.” Animal Ask. <https://www.animalask.org/research>.

Staples, Louis, and Sirena Bergman. 2020. “All of These Supermarkets Have Told Boris Johnson They’ll Never Stock Trump’s Chlorinated Chicken.” indy100. 2020. <https://www.indy100.com/news/chlorinated-chicken-trump-trade-deal-supermarkets-waitrose-aldi-tesco-boris-johnson-9611571>.

Stevenson, Peter. 2018. “A Better Brexit for Farm Animals: What the Government Must Do to Protect Welfare Standards.” Food Research Collaboration.

The Conservative Party. 2019. “Conservative Party Manifesto 2019.” Conservatives. 2019. <https://www.conservatives.com/our-plan/conservative-party-manifesto-2019>.

The Swiss Parliament. 2019. “Produits Provenant D'animaux Ayant Subi de Mauvais Traitements. Producteurs Nationaux et étrangers Sur Un Pied D'égalité (repris Tel Quel de Barbara Keller-Inhelder).” The Federal Assembly - The Swiss Parliament. 2019. <https://www.parlament.ch/en/ratsbetrieb/suche-curia-vista/geschaeft?AffairId=20194583>.

Trade and Agriculture Commission. 2021. “Final Report.” UK Government. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/969045/Trade-and-Agriculture-Commission-final-report.pdf. Trade & Animal Welfare Coalition. 2021a. “Defining Core Standards for Animal Welfare in Trade Policy.” Trade & Animal Welfare Coalition. <https://tawcuk.org/738-2/>.

— — . 2021b. “Animal Welfare in Trade Negotiations: How to Assess the Risks and the Results? The Case of the UK-Australia Free Trade Agreement.” Trade & Animal Welfare Coalition. <https://tawcuk.org/wp-content/uploads/2021/07/Updated-Overview-of-AusUK-Deal.pdf>.

Treat, Sharon Anglin, and Orla Delargy. 2020. “US-UK Trade Deal Is a Threat to Food and Farmers.” Institute for Agriculture & Trade Policy. 2020. <https://www.iatp.org/blog/202010/us-uk-trade-deal-threat-food-and-farmers>.

UK Government. 2020. “UK/Japan: Agreement for a Comprehensive Economic Partnership [CS Japan No.1/2020].” UK Government. <https://www.gov.uk/government/publications/ukjapan-agreement-for-a-comprehensive-economic-partnership-CS-japan-no12020>.

— — . 2021a. “Free Trade Agreement between the United Kingdom of Great Britain and Northern Ireland and Australia.” UK Government. <https://www.gov.uk/government/collections/free-trade-agreement-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-australia>.

— — . 2021b. “UK/EU and EAEC: Trade and Cooperation Agreement [TS No.8/2021].” UK Government. <https://www.gov.uk/government/publications/ukeu-and-eaec-trade-and-cooperation-agreement-ts-no82021>.

— — . 2021c. “UK-New Zealand FTA Negotiations: Agreement in Principle.” UK Government. <https://www.gov.uk/government/publications/uk-new-zealand-free-trade-agreement-negotiations-agreement-in-principle/uk-new-zealand-ftha-negotiations-agreement-in-principle>.

— — . 2022. “Seafood Sector Set to Benefit as UK Starts Greenland Trade Talks.” Gov.UK. 2022. <https://www.gov.uk/government/news/seafood-sector-set-to-benefit-as-uk-starts-greenland-trade-talks>.

UK Parliament. 2020a. “Agriculture Bill Volume 682: Debated on Monday 12 October 2020.” Hansard. 2020. <https://hansard.parliament.uk/Commons/2020-10-12/debates/23E1C827-D8C0-481D-9D97-40920456BBB4/AgricultureBill>.

— — . 2020b. “Agriculture Bill Volume 805: Debated on Tuesday 22 September 2020.” Hansard. 2020. <https://hansard.parliament.uk/Lords/2020-09-22/debates/1A030753-AD32-4AEA-A626-93299698C2EC/AgricultureBill>.

— — . 2020c. “Trade Bill Volume 678: Debated on Monday 20 July 2020.” Hansard. 2020. <https://hansard.parliament.uk/Commons/2020-07-20/debates/D5201166-082F-458F-9016-60B1D01CE750/TradeBill>.

— — . 2021a. “Comprehensive and Progressive Agreement for Trans-Pacific Partnership Volume 689: Debated on Thursday 25 February 2021.” Hansard. 2021. <https://hansard.parliament.uk/Commons/2021-02-25/debates/91EE121E-1FBC-46C0-BD53-0BB40923BB51/ComprehensiveAndProgressiveAgreementForTrans-PacificPartnership>.

— — . 2021b. “Trade Bill Volume 687: Debated on Tuesday 19 January 2021.” Hansard. 2021. <https://hansard.parliament.uk/Commons/2021-01-19/debates/140EC114-B1A8-4581-94A1-0AF4447BA9DE/TradeBill>.

— — . 2021c. “Trade Bill Volume 809: Debated on Wednesday 6 January 2021.” Hansard. 2021. <https://hansard.parliament.uk/Lords/2021-01-06/debates/487B9A63-A844-4486-BBDB-78C6CB5DCC7C/TradeBill>.

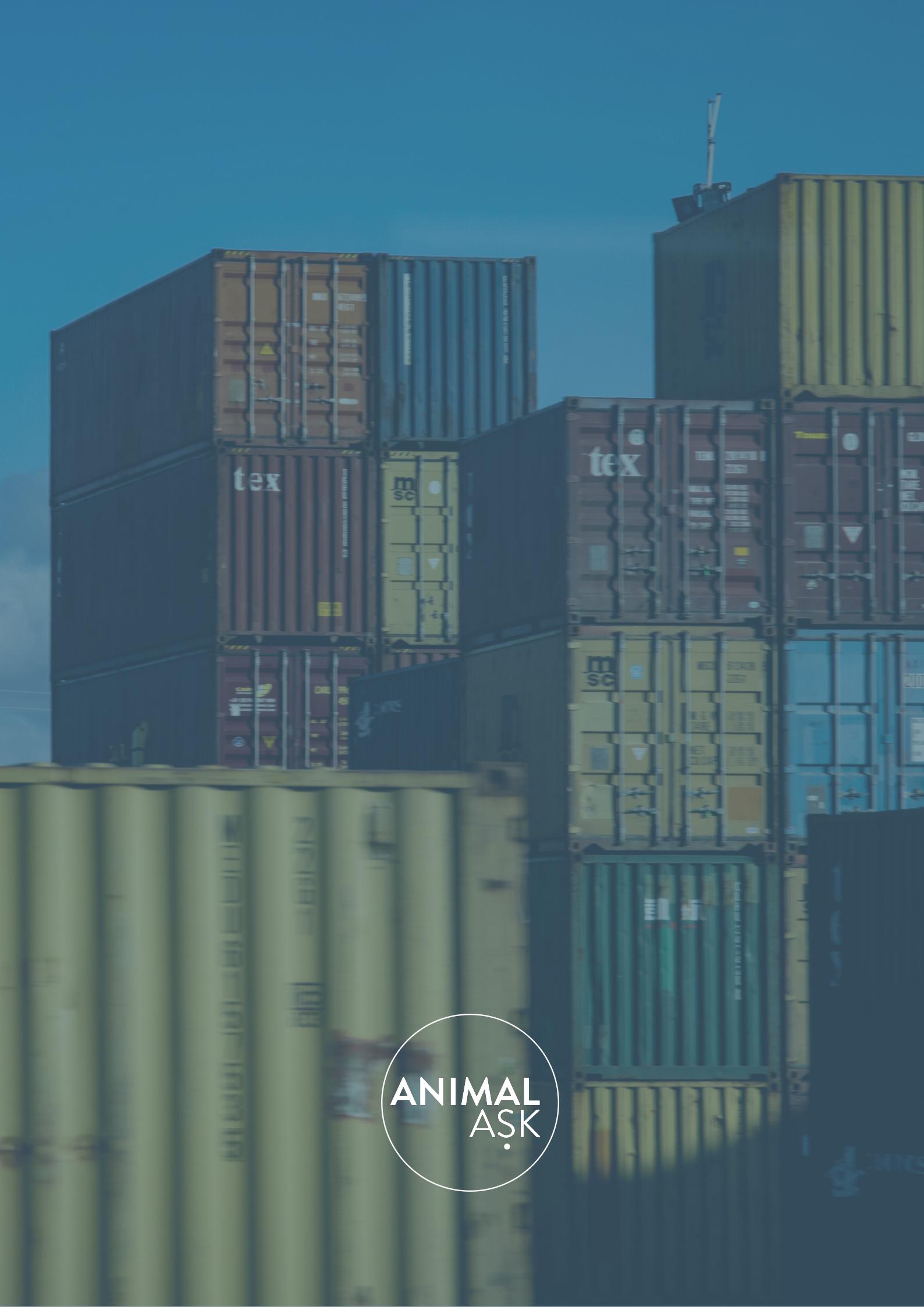
US Department of Agriculture. 2021. “Brexit and U.S. Agricultural Trade.” Economic Research Service. 2021. <https://www.ers.usda.gov/topics/international->

[markets-u-s-trade/countries-regions/european-union/brexit-and-u-s-agricultural-trade/](#).

Wilkinson, Derrick. 2020. “Defending British Farming Standards in post-Brexit Trade Negotiations.” *EuroChoices* 19 (1): 4–10.

World Animal Protection. 2020a. “Animal Protection Index.” World Animal Protection. 2020. <https://api.worldanimalprotection.org/>.

— — . 2020b. “Animal Protection Index: Thailand.” World Animal Protection. 2020. <https://api.worldanimalprotection.org/country/thailand>.



ANIMAL
ASK