



# BAN LOW WELFARE IMPORTS

**AUTHOR: V. COX**

Review: S. Hilton, A. Bansal



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**RECOMMENDED**

# Research Report:

## Animal Welfare – Ban low-welfare imports

**Author:** Vicky Cox

**Review:** Sam Hilton and Akhil Bansal

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For questions about the content of this research, please contact Vicky Cox at [vicky@charityentrepreneurship.com](mailto:vicky@charityentrepreneurship.com). For questions about the research process, please contact Sam Hilton at [sam@charityentrepreneurship.com](mailto:sam@charityentrepreneurship.com).

## Executive summary

Animal welfare standards differ greatly across the globe. As a result, we find countries with high animal welfare standards importing animal products that would be illegal to produce locally. Local producers and consumers are starting to question the fairness and morality of this and are beginning to ask for changes to be made.

We think that trade could be an interesting and useful mechanism to address this discrepancy. High-welfare countries, such as in the EU, the UK, New Zealand, and Switzerland could attempt to increase the welfare standards in typically low-welfare countries by restricting access to their markets unless specific animal welfare standards are met. This could be achieved through a ban on imported animal products that do not meet the high-welfare country's animal welfare standards.

We estimate that this intervention would significantly improve the lives of millions of animals every year. Fish are currently imported from countries where they are grossly overstocked, and subjected to cramped conditions in poor quality water. They are victims of poor, highly stressful transportation practices and slaughtered painfully without prior stunning. **This intervention would prevent ~8 million fish from such suffering every year.** Pork is imported from countries that employ horrendous farming methods, such as the use of cruel farrowing crates and tail mutilation without anesthetic. **Each year, this intervention would give ~500,000 pigs the chance to live a more natural, humane life.** Chicken is imported that lived in harrowing conditions prior to slaughter. Broiler chickens are packed together so densely that the ammonia burns their lungs, eyes and feet. The stress causes them to viciously peck at each other. Laying hens are kept in notorious battery cages. These conditions are so bad it would be far better for the chickens to never be born than to live out such a miserable existence for the entire duration of their lives. Our hope is that **the intervention will reduce the number of chickens enduring such lives by ~370,000 each year.**

These are just a few types of animals that are suffering needlessly each year, this intervention would also help many others, such as cows and sheep. In addition, the impact of such policy change in New Zealand, our recommended implementation country, may reach far beyond these numbers. Such a policy enforced here could

create positive international precedent, leading to the improvement of millions more animals' lives around the world.

**World Trade Organization case law suggests that import bans based on animal welfare concerns are compliant with its rules** under the public morals exemption provided for in GATT Article XX.

**There is also evidence that advocacy leads to policy change in this space.** Looking at 74 case studies of previous advocacy efforts for import bans on animal products across the globe, we found the average success rate was ~18%, with 13 of 74 campaigns resulting in policy change in an average of 5.2 years. Moreover, with **support from farmers and the general public growing**, now may be a particularly good time for advocacy on this issue.

We have modeled this intervention in New Zealand as a promising country with high animal welfare standards where little work is currently being done, and we have found that this intervention can be **very cost-effective**. Our cost-effectiveness estimate yielded an estimated impact of 23.08 welfare points affected per dollar when considering both charity and government costs and 185.99 welfare points affected per dollar considering only charity costs.

However, there are still some important concerns to keep in mind. Most importantly, **this intervention may not be very scalable** as we have only identified four geographic areas - the EU, the UK, New Zealand, and Switzerland - as having sufficiently high animal welfare standards to implement across the globe. We have identified New Zealand as the most promising country for this intervention as there are ongoing campaigns in all of these other countries, though the size and effectiveness of these campaigns differ between countries.

Overall, our view is that advocacy in a high-welfare country for an import ban on animal products that do not meet local animal welfare standards **is an idea worth recommending** to future charity founders.

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## 1 Introduction

This report has been produced by Charity Entrepreneurship (CE). CE's mission is to cause more effective charities to exist in the world by connecting talented individuals with high-impact intervention opportunities. We achieve this goal through an extensive research process and our Incubation Program. In 2022, our research process focused on the top interventions within animal welfare.

*Banning low-welfare animal product imports* was chosen by CE research staff as a potentially promising intervention within this category. This decision was part of an eight-month process designed to identify interventions that were most likely to be high-impact avenues for future charity entrepreneurs. This process began by listing nearly 275 ideas and gradually narrowing them down, examining them in more and more depth.

In order to assess how promising interventions would be for future charity entrepreneurs, we use a variety of different decision tools such as group consensus decision-making, weighted factor models, cost-effectiveness analyses, quality of evidence assessments, case study analyses, and expert interviews.

This process was exploratory and rigorous, but not comprehensive – we did not research all 275 ideas in depth. As such, our decision not to take forward a charity idea to the point of writing a full report should not be seen as a view that the idea is not good.

## 2 Background

The intervention explored in this report is the introduction of an import ban on animal welfare products that do not meet the animal welfare standards of a high-welfare country. That is, a country cannot access the market of a high-welfare country unless their animal welfare standards are high enough. Such a ban would cause consumers to purchase fewer 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 farmed animals.

Import bans have typically been used in the past to ban the import of particularly cruel, individual products such as fur and foie gras. However, more general bans of poor animal welfare products are also starting to be considered. For example,

California’s Prop 12 calls for a requirement that all pork and veal sold in California be produced without restrictive crates, and that all eggs produced and sold in the state be cage-free. A draft of the EU-Mercosur trade deal is the first to conditionally liberalize trade based on animal welfare standards: eggs imported from Brazil, Argentina, Paraguay, and Uruguay will only benefit from a zero tariff if the hens are kept in production systems that meet EU animal welfare standards.

Despite concern from some stakeholders, World Trade Organization case law indicates that countries can require imports to meet welfare standards equivalent to their own. The most clear example of this is the EC-Seal Products case where the Appellate Body ruled that in the EU, animal welfare is a concern that comes within the field of public morals and as such they could ban the import of seal products under the public morals exemption provided for in GATT Article XX.

We recommend advocacy calling for a ban on imported animal products that do not meet local welfare standards in New Zealand. New Zealand was chosen as our priority country as little work is currently being done here, and stakeholder support for this issue has grown following the recent announcement that farrowing crates are being phased out by December 2025. As the pork industry is already made up of 60% imports, farmers and consumers fear that this farrowing crate ban will mean that imported products will further outcompete local production. This could force some farmers out of business and leave consumers forced to consume lower welfare pork products.

### 3 Theories of change

The theory of change for advocating for a ban on imported animal products that do not meet local welfare standards is illustrated in this section. We also highlight the key assumptions being made in this theory of change.

The theory of change for this intervention could be as follows:





The key assumptions, corresponding to each step (i.e., “→”) in the theory of change, are:



Scale: key uncertainty, high uncertainty, some uncertainty, low uncertainty, un concerning.

## 4 Geographic assessment

Our geographic assessment was focused on identifying countries with high animal welfare standards whose animal product import market was made up of countries with low animal welfare standards.

To identify these countries, we used [World Animal Protection’s Animal Protection Index](#) which evaluates and ranks 50 countries around the world according to their legislation and policy commitments to protecting animals. We focused on each country’s specific ranking for the “Protecting animals used in farming” indicator, rather than on the general ranking, as this seemed most relevant.

The following countries ranked the highest on the Animal Protection Index’s “Protecting animals used in farming” ranking (note that no countries received the highest ranking of A):

- Ranking of B – Austria and Sweden
- Ranking of C – Denmark, Netherlands, Switzerland, New Zealand, and Poland

We note that the UK received a ranking of D on this indicator, but we still think that it is worth considering. Looking at World Animal Protection's profile for the UK which details the reason for giving the UK this ranking, it seems like this was mostly due to the fact that, at the time of evaluation, the UK had recently left the EU and so there was uncertainty on what the UK's animal welfare legislation would look like as a result of this. We also note that the UK received both a general ranking of A and a ranking of A for the "Protecting animals used in farming" indicator in the previous Animal Protection Index rankings of 2014 ([web.archive.org, 2019](https://web.archive.org/2019)). Looking at the differences in methodology between the 2014 index and the 2020 index, we can see that countries have generally been given lower rankings in 2020 compared to 2014 as the index's scoring has gotten more stringent as "expectations on animal welfare have evolved" ([World Animal Protection, 2020b](#)), rather than animal welfare legislation getting worse. Moreover, the UK is generally considered to be one of, if not *the* highest welfare countries in the world, so the ranking of D definitely feels unrepresentative of the actual situation in the UK as it stands in 2022 (especially as the UK government has passed more animal welfare friendly legislation since this profile was written in 2020).

Based on this information, we decided to further consider the following countries: the EU<sup>1</sup>, the UK, New Zealand, and Switzerland. We will consider these countries individually to evaluate their promise as the country for a new charity to work in. Note that a lot of the considerations that ruled a country in or out during this evaluation were raised by experts - more information can be found in the [Expert views section](#).

## 4.1 The EU

One of the most important considerations for working at the EU level is that it may be more difficult than working with the government of an individual country. However, there do seem to be reasons to believe that now might be a particularly good time to work at the EU level, as the French presidency has recently shown its support for banning "low-standard" agriculture imports and has identified mirror clauses<sup>2</sup> as a potential way to achieve this ([European Council, 2022a](#)), and the European Commission's latest report on mirror measures confirms the ability to extend the application of EU animal welfare standards to imported agricultural and

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<sup>1</sup> Note that we considered working at the EU level rather than in the highest welfare member states individually as these countries do not have much control over their import and export laws as they are in the EU trade bloc.

<sup>2</sup> Mirror clauses would guarantee that imported animal products are produced under the exact same welfare standards that are imposed in the EU.

agri-food products, in compliance with WTO standards ([European Commission, 2022](#)). However, it is important to note that the French presidency will end before this charity will be founded – if this idea were to be recommended, then it will be founded in ~March 2023 out of our winter incubation program, and the French presidency ends in June 2022 ([European Council, 2022b](#)), so this new charity will not be able to take advantage of this support. We do, however, note that Sweden will have the Presidency of the EU when this charity is founded ([European Council, 2022b](#)), and they are considered to be animal welfare-friendly ([Dullaghan, 2021](#)) and therefore perhaps this could still be used to the charity's advantage.

Another important consideration when evaluating work in the EU is that there is already an organization that is advocating for the ban of low-welfare imports at the EU level – Eurogroup for Animals. Eurogroup for Animals has a team of three dedicated to advocacy on animal welfare and trade issues, and they also have many member organizations across Europe that they mobilize in support of their objectives ([Eurogroup for Animals, n.d.a](#); [Eurogroup for Animals, n.d.b](#)). Therefore, work in the EU is not very neglected. Experts mostly seemed to think that the work of Eurogroup for Animals was sufficient and that a new organization working in this space would not be necessary, as Eurogroup for Animals is already doing good work and they are already very established in the EU ecosystem, have many existing connections and have had previous successes in this space. Therefore, it makes sense to support them rather than starting a new organization.

Overall, we decided that working at the EU level didn't look very promising given the good work being done by Eurogroup for Animals.

## 4.2 The UK

When evaluating the promise of this intervention, we found that the political will and appetite for advocacy on this issue in the UK is very weak; therefore, starting a new organization to work on this issue is not likely to be promising. This attitude is best highlighted in the following considerations:

- This issue passed through parliament in the UK in 2020 and ultimately failed – it passed through the House of Lords but failed in the House of Commons which cited that they “Do not consider it appropriate to create new requirements for imports to meet particular standards.” ([United Kingdom Parliament, 2020](#))

- The general view on why this failed is that the government is concerned about negotiating its own trade deals following Brexit and doesn't want to do anything that would weaken its negotiating position or put countries off signing a trade deal with them.
- Following the UK's departure from the EU, the UK government announced an action plan for animal welfare which included a commitment to explore the potential of an import ban of fur and foie gras ([Department for Environment, Food & Rural Affairs, 2021a](#)). However, the government is now backtracking on this commitment ([Eardley & McSorley, 2022](#)). If the government is not willing to ban the import of these specific products that have more of a precedent for import/sales bans across the globe (see the [Case study analysis below](#)), then it seems unlikely that they would be willing to ban the import of all low-welfare products.
- In 2021, the Department for Environment, Food & Rural Affairs (Defra) proposed an enabling power on trade and import bans. This enabling power would allow Defra to introduce import bans without a parliamentary vote. However, this proposal was reported to have been blocked by the former International Trade Secretary, Liz Truss ([Casalicchio, 2021](#)). This enabling power legislation never passed which suggests a general lack of appetite for change on this issue.

Moreover, there seem to be two additional reasons to suggest that a new organization working in this space might not be promising, despite the political will:

- There are already organizations working on this issue in the UK, notably the [Trade Animal Welfare Coalition](#) (TAWC) and Eurogroup for Animals member organizations, in particular, [the RSPCA](#).
- Experts highlight that there would be little reason for the civil service to come to a new organization working on this issue – the space is somewhat crowded and they would prefer going to people with existing connections/who are already established eg., TAWC or the RSPCA.

Therefore, it seems that working on this issue in the UK doesn't currently seem promising. However, Animal Ask has noted that it may be promising for an organization to focus on securing commitments from parties in their manifestos for the upcoming general election, as perhaps parties other than the Conservative party would have more appetite for this ([Springlea, 2022](#)). It may also be the case that if

commitments are secured from all other parties, then the Conservatives may be forced to pursue this issue in the future or risk losing the vote of farmers who have generally been a big supporter base in the past.

### 4.3 New Zealand

Although New Zealand's import market is much smaller than the import markets of the EU, the UK, and Switzerland, we have reason to believe that it would still be as or more impactful to work here for the following reasons:

- Unlike the EU and the UK, New Zealand has legislation that is relevant to fish and therefore banning low-welfare imports into New Zealand has the potential to impact many more individuals than a similar ban in the EU or UK, as fish would be impacted alongside chickens, pigs, sheep, and cattle.
  - In the UK and EU, only the general principle of the slaughter regulation applies to farmed fish - that these animals should be spared any avoidable pain, distress, or suffering during their killing and related operations ([Whitnall, 2022](#); [Giménez-Candela, Saraiva, and Bauer, 2020](#)).
  - New Zealand, on the other hand, has specific requirements for the welfare of fish at slaughter which regulates equipment, holding tanks, handling, competencies, rapid and irreversible loss of consciousness, and killing methods ([New Zealand Government, 2018](#)).
  - Moreover, New Zealand animal welfare regulations also require that specific water quality parameters are monitored during transport and that they are maintained within the appropriate range ([Ministry for Primary Industries, 2018](#)). In the UK and EU, again, only general principles apply ([Whitnall, 2022](#); [Giménez-Candela, Saraiva, and Bauer, 2020](#)).
- New Zealand does more trade with lower-welfare countries than the EU, the UK, or Switzerland do.
  - Trade in the EU, the UK, and Switzerland is mostly intra-European whereas New Zealand is more likely to trade with Australia and countries in Asia.

Work in New Zealand also seems to be quite neglected. Experts from the [New Zealand Animal Law Association](#) told us that there is currently no one working full time on this issue - there is currently only one member of the New Zealand Animal

Law Association who volunteers his weekends to this work. Therefore, a new organization could be expected to have quite a lot of impact here.

Based on these considerations, and other considerations highlighted by experts and summarized in the [Expert views section](#), we think that it would be promising for a new organization to work in New Zealand.

## 4.4 Switzerland

There is already an ongoing initiative on this issue in Switzerland. [Sentience Politics' initiative to abolish factory farming in Switzerland includes a clause on banning low-welfare imports](#). The Swiss electorate will be voting on this initiative in either September or November of 2022.<sup>3</sup> Therefore, it makes sense to wait to see the outcome of this initiative before launching a new initiative.

If this initiative fails, it is not necessarily an indication of a lack of political will or voter interest in banning low-welfare imports. The “Abolish Factory Farming” initiative covers a wide range of topics, and perhaps voters who disagree with one section would still agree with a ban on low-welfare imports. If considering work in Switzerland, perhaps a survey on this could be a good way to get a sense of whether a future initiative focused only on low-welfare imports could be successful.

We should also consider whether it would make sense to launch another initiative so soon after this one. If we think that it could be promising, we should also consider whether a new organization would be best placed to do this or whether Sentience Politics would be open to launching this initiative themselves, as they may have a comparative advantage given their experience in the policy space in Switzerland. It could be possible that Sentience Politics would be willing to launch an initiative focused on this, as Animal Ask has identified this as the most promising intervention in Switzerland ([Bridgwater, Gittins, and Odene, 2021](#)).

## 4.5 Conclusion

It seems that New Zealand is the most promising country for a new organization to work in right now, though it may be worth reconsidering the UK and Switzerland again in the future.

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<sup>3</sup> When this report was originally written in April–May 2022 it was uncertain when this vote would happen. However, as we are copyediting this report ready for publishing in October 2022, we can now unfortunately report that this initiative was voted on on 25th September 2022 where the initiative was rejected with 62.86% of voters voting against ([Mantovani, 2022](#)).

Now that New Zealand has been identified as the most promising country, we evaluate its import market to find the main sources of animal products. The animal products we focus on will be: poultry meat, swine meat, bovine meat, sheep and goat meat, fish, eggs, milk, and wool.

To estimate the number of animals that could be impacted by banning low-welfare imports into New Zealand, [an analysis was performed](#) where we converted import tonnage data from the FAO ([for fish](#) and [for all other animals and animal products](#)) to the number of individuals by using estimated mean weight data. For fish, we also used data on the percentage of fish that were farmed vs. wild-caught in the exporting country, as New Zealand's fish welfare legislation mostly only applies to farmed fish.<sup>4</sup>

Below we summarize the results of this analysis for the three farmed animals we expect to have the highest number of non-compliant individuals (that is, the number of animals that are produced in countries that are ranked D or lower and are therefore incompatible with New Zealand animal welfare legislation, which is ranked C). These animals are:

- Fish – an estimated 8,708,920 animals could be impacted annually
- Pigs – an estimated 507,364 animals could be impacted annually
- Broiler chickens (and other poultry used for meat production) – an estimated 357,368 animals could be impacted annually

## Fish

The table below displays the five largest exporters of fish into New Zealand. Together these five countries make up 89.20% of New Zealand's total fish import market. Each country's ranking for "Protecting animals used in farming" from World Animal Protection's Animal Protection Index is also displayed.

Country	% of imports	World Animal Protection's Animal Protection Index "Protecting animals used in farmed" ranking
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<sup>4</sup> The legislation also applies to wild-caught vertebrate finfish that are held for killing at a later time, but this seems complicated to enforce – and get data on for this analysis – so we have assumed that these fish will not be impacted by New Zealand's import ban.

New Zealand	~\$101.754M import market for fish	C
China	43.05%	G
Thailand	25.02%	F
Vietnam	10.75%	G
Australia	7.34%	E
Norway	3.04%	Not rated

We will now briefly compare New Zealand’s fish welfare standards with those of these top exporting countries to illustrate the differences between standards in a high-welfare country and a low-welfare country.

- New Zealand - outlines specific protections for fish at the time of killing and during transport ([New Zealand Government, 2018](#); [Ministry for Primary Industries, 2018](#))
- China - there is no legislation specifically relating to the rearing of fish
- Thailand - there is no legislation specifically relating to the rearing of fish
- Vietnam - there is no legislation specifically relating to the rearing of fish
- Australia - there is no legislation specifically relating to the rearing of fish at the national level
- Norway - outlines rules for general fish welfare, competence of operators, methods and technical devices, handling, stunning and killing ([European Commission, 2018](#))

## Swine meat

The table below displays the five largest exporters of swine meat into New Zealand. Together these five countries make up 71.84% of New Zealand’s total swine meat import market. Each country’s ranking for “Protecting animals used in farming” from World Animal Protection’s Animal Protection Index is also displayed.

Country	% of imports	World Animal Protection’s Animal Protection Index “Protecting animals used in farmed” ranking
New Zealand	\$174.517M import market	C

	for swine meat	
USA	22.46%	E
Spain	17.72%	D
Poland	11.76%	C
Canada	11.38%	D
Australia	8.51%	E

We will now briefly compare New Zealand's pig welfare standards with those of these top exporting countries to illustrate the differences between standards in a high-welfare country and a low-welfare country. To do this we will consider whether sow stalls and/or farrowing crates are permitted.

- New Zealand - sow stalls are banned and farrowing crates are being phased out by December 2025 ([Ministry for Primary Industries, 2022](#))
- USA - there is no ban on the use of sow stalls or farrowing crates at the federal level ([World Animal Protection, 2020c](#))
- Spain - the EU prohibits the use of sow stalls except for the first four weeks in a sow's pregnancy, and farrowing crates may be phased out by 2027 ([World Animal Protection, 2020d](#); [left.eu, 2021](#))
- Poland - the EU prohibits the use of sow stalls except for the first four weeks in a sow's pregnancy, and farrowing crates may be phased out by 2027 ([World Animal Protection, 2020e](#); [left.eu, 2021](#))
- Canada - the use of sow stalls and farrowing crates is regulated - sow stalls can only be used for the first four weeks in a sow's pregnancy, and sows must not be kept in farrowing crates for more than six weeks in any one reproductive cycle ([World Animal Protection, 2020f](#))
- Australia - there is no ban on the use of sow stalls or farrowing crates at the national level ([World Animal Protection, 2020g](#))

## Poultry meat

The table below displays the five largest exporters of poultry meat into New Zealand. Together these five countries make up 93.93% of New Zealand's total poultry import market. Each country's ranking for "Protecting animals used in farming" from World Animal Protection's Animal Protection Index is also displayed.

Country	% of imports	World Animal Protection's Animal Protection Index "Protecting animals used in farmed" ranking
New Zealand	\$3.462M import market for poultry meat	C
Thailand	58.53%	F
USA	26.73%	E
China	3.18%	G
France	2.89%	D
Australia	2.60%	E

We will now briefly compare New Zealand's broiler chicken welfare standards with those of these top exporting countries to illustrate the differences between standards in a high-welfare country and a low-welfare country. To do this we will look at the permitted stocking densities for broilers:

- New Zealand - stocking density must not exceed 38kg/m<sup>2</sup> ([World Animal Protection, 2020h](#))
- Thailand - there is no specific stocking density limit included in the legislation; instead, it vaguely says that these animals need "sufficient space" ([World Animal Protection, 2020i](#))
- USA - there is no legislation at the federal level limiting stocking density of broiler chickens ([World Animal Protection, 2020c](#))
- China - there is no legislation specifically relating to the rearing of broiler chickens ([World Animal Protection, 2020j](#))
- France - stocking density must not exceed 42kg/m<sup>2</sup> ([World Animal Protection, 2020k](#))
- Australia - stocking density must not exceed 46kg/m<sup>2</sup> ([World Animal Protection, 2020g](#))

## 5 Quality of evidence

Here we will consider three main inputs: 1) a case study analysis of previous advocacy efforts for import and sales bans on animal products, as well as case studies of analogous efforts- such as cases of where trade has been used to improve

animal welfare in the past in more general means than import bans. We also briefly consider non-animal welfare cases; 2) we map the opinions of various stakeholders: farmers, the general public, and the government; and 3) we consider theoretic evidence which evaluates the arguments and strategic case for and against this intervention.

## 5.1 Case studies

Looking at 74 case studies of previous advocacy efforts for import bans on animal products across the globe, we found that it has been difficult to make change in this space in the past. The average success rate was ~18%, with 13 of 74 campaigns resulting in policy change in an average of 5.2 years (the overall range of time taken to achieve success was one-12 years).

It is important to note, however, that none of these successes have been for a ban on all low-welfare imported animal products but bans on specific products such as fur and foie gras. In this instance, therefore, we may expect the success rate to be lower than 18%.

You can find all of the case studies used in [Annex 1](#).

There are also examples of trade deals that have been negotiated by the EU that have improved animal welfare in an exporting country without the inclusion of an import ban<sup>5</sup>:

- EU-Mercursor trade agreement (still under negotiation) – Under this FTA, eggs imported from Brazil, Argentina, Paraguay and Uruguay to member states will only be duty-free if the hens are kept in line with EU standards ([Busby, 2019](#))
- [2002 EU-Chile trade agreement](#) – this trade agreement successfully improved slaughterhouses in Chile, leading to better animal welfare and increased trade in higher-welfare products into the EU ([Ghislain and Vega, 2021](#))
- [2011 EU-Korea trade agreement](#) – this trade agreement foresees the exchange of information, expertise, and experiences on animal welfare, and the cooperation on developing standards in international fora, – notably on

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<sup>5</sup> Note that these trade deals are also listed in Annex 1 and have been considered as “successes along the way” for groups working in the EU that have the ultimate goal of banning low-welfare imports into the EU.

stunning and transport – as well as the adoption of a working plan for these activities ([eur-lex, 2011](#))

- [2014 EU-Ukraine trade agreement](#) – this trade agreement granted Ukraine substantial trade preferences on animal-based products while committing the country to align its rules, notably on animal welfare, with the EU's ([Eurogroup for Animals, 2019](#))
- [2018 EU-Mexico trade agreement](#) – this trade agreement was the first with a standalone chapter on animal welfare and antimicrobial resistance. It had a reference to animal sentience, a commitment to better implement OIE standards, and an overarching goal to enhance the protection and the welfare of animals ([Eurogroup for Animals, 2020](#))

We can also find some non-animal welfare examples of import bans; for example, Israel has a ban on the import of all non-kosher meat, Indonesia has imposed special restrictions on the importation of all alcohol, and the US has a ban of all products made by indentured child labor ([Kerr, 2019](#)).

## 5.2 Stakeholder mapping

### Farmers

In New Zealand it seems as if farmer interest in this policy is quite new given the recent announcement that farrowing crates are being phased out by December 2025 ([Ministry for Primary Industries, 2022](#)). It seems like this policy, in particular, has caused farmers to favor an import ban, as the pork industry is already made up of 60% imports ([AHDB, 2022](#)). Farmers fear that this farrowing crate ban will force some farmers out of business, and then this ratio will only worsen, with local production meeting even less of the local demand.

Therefore, all of the support we have managed to find for an import ban in New Zealand comes from pig farmers.<sup>6</sup> For example, New Zealand Pork, which represents 93 farmers with 637,000 pigs and annual sales of \$750 million, launched a petition asking the Government to force producers of imported pork to meet the same animal welfare standards as pig farmers in New Zealand. The tagline of the chief executive of New Zealand Pork, when talking about this petition and this issue, generally seems to be, “It’s time for this cheaper, imported pork to either shape up or ship out” ([Hale, 2021](#); [Zollickhofer, 2021](#); [Farmers Weekly New Zealand, 2021](#)).

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<sup>6</sup> Note that we do not have evidence of a lack of support from other farmers, rather there is an absence of evidence on the support of other farmers on this issue.

The petition closed on 31st January 2022 with 3,365 signatures ([New Zealand Parliament, 2022](#)).

There are also various articles highlighting that New Zealand pork farmers are frustrated that imported pork doesn't have to meet the same standards, and that these farmers are questioning the equity and fairness of that ([Taunton, 2021](#); [Morrison, 2021](#)).

Therefore, it seems like there is strong support from pig farmers, but a new organization working on this issue in New Zealand may need to mobilize the support of other farmers.

## General public

Experts highlighted that this is likely an issue that the general public hasn't thought too much about; however, we did find some examples of public support for an import ban; though again, all of the evidence we managed to find was specifically in the context of pork products.

Research conducted by the pork industry showed that 75% of those surveyed believed imported pork should meet the same standards as New Zealand produced pork ([Morrison, 2021](#)). This is similar to the general level of support we have seen in other countries. For example, a Eurobarometer survey from 2016 found that 93% of Europeans agree with the statement: "imported products from outside the EU should respect the same animal welfare standards as those applied in the EU" ([Eurobarometer, 2016](#)).

## Government

We struggled to find much written on the government's perspective on this issue.

As is the case in most countries, it seems like the government is generally concerned about breaking World Trade Organization rules and/or their trade partners disputing this import ban. For example, the New Zealand Animal Law Association reports that the Ministry of Agriculture and Forestry stated the following position when considering import bans: "International trade rules do not allow countries to discriminate against trade in products on the basis of animal welfare standards in the exporting country" ([Schmidt, Duffield, Ferrere, and Knight, 2021](#)).

Experts mentioned that the Labour Party is generally more pro-animal, so they could be supportive. Within the New Zealand National Party, and even in some sectors of the Labour Party, there is a strong farming influence; so they could be supportive if they see farmers are in support. Therefore, it seems like advocacy on this issue could achieve cross-party support.

### 5.3 Theoretic evidence

Why has this not happened already?

It seems like the main barrier to an import ban on lower-welfare animal products is the hesitancy of governments to implement these bans, as they are concerned that this may not be compliant with World Trade Organization (WTO) rules and/or that this legislation will be challenged/disputed by their trading partners.

However, this doesn't seem to account for the importance of recent WTO case law, which indicates that there may be room for countries to impose import bans based on animal welfare.

WTO case law tentatively indicates that countries can require imports to meet welfare standards equivalent to their own, provided that there is no element of discrimination in favor of domestic producers, and no discrimination between different would-be exporting countries. WTO Article XX, which sets out General Exceptions to the WTO's prohibition on trade restrictions, is key here. One of these General Exceptions relates to public morals, and another to the conservation of natural resources; both of these exemptions have implications for animal welfare ([World Trade Organization, 2012](#)).

In the US-Shrimp case (2001), the US was challenged for its trade policy prohibiting the importation of shrimp from countries whose regulations did not sufficiently protect sea turtles from trawlers. The WTO Appellate Body concluded that Article XX(g), which makes an exemption for trade restrictions "relating to the conservation of natural resources," supports a nation's right to restrict imports from countries whose regulations are not "comparable in effectiveness" to its own ([World Trade Organization, 2001](#)).

A more recent example is the EC–Seal Products case (2014). The Appellate Body ruled that in the EU, animal welfare is a concern that comes within the field of public morals ([World Trade Organization, 2014](#)).

WTO dispute panels and the Appellate Body have stated on several occasions that member countries have the right to determine the level of protection that they consider appropriate to achieve a given policy aim, for example, in regard to public health, conservation, prevention of deceptive practices, or public morals (World Trade Organization [2014](#); [2017](#); [2013](#)).

Moreover, the EU requires imported meat to be derived from animals slaughtered to welfare standards at least equivalent to its own ([eur-lex, 2009](#)), and this has not been challenged under the WTO rules.

Therefore, this shows that a WTO member country can plausibly require imports to meet animal welfare standards equivalent to its own, provided that there is no element of discrimination (which there will not be if this import ban is passed in primary legislation rather than in individual trade deals – which is what we are suggesting a new organization should advocate for). If challenged, it can seek to defend its requirement under the WTO’s public morals exception.

## 6 Expert views

We spoke with a total of eight experts. We spoke with at least one expert from each of the countries that were considered during the geographic assessment to help us make the decision on which country a new organization advocating for a ban on low-welfare imports should work in.

### 6.1 The EU

We spoke with three experts about a new organization working at the EU level.<sup>7</sup> One expert wished to remain anonymous, one expert is a former MEP, and the other expert we spoke with was Stephanie Ghislain of [Eurogroup for Animals](#).

Experts were somewhat divided on whether a new organization should work at the EU level – only one expert thought that this would be promising, whereas the other two thought that the work of Eurogroup for Animals was sufficient.

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<sup>7</sup> Please note that one of the experts we spoke with about working in the EU also spoke with us about working in the UK so we have summarized their views in both subsections.

The expert that was making the case for a new organization working at the EU level thought that this could be promising as now seems like an especially good time to advocate for this issue in the EU. This is because the French presidency has recently shown its support for banning “low-standard” agriculture imports and has identified mirror clauses<sup>8</sup> as a potential way to achieve this. We are unsure what the update should be based on the promise of the French presidency’s support: on one hand, this could mean that political will is high and so now is the best time for organizations to be advocating on this issue. On the other hand, this could also mean that mirror clauses are likely to happen anyway without a new organization advocating on this issue.

Experts thought that it could be promising for a new organization to work more with farmers, though Eurogroup for Animals and its member organizations already do some of this work. The general consensus on this seemed to be that it would be great to see a grassroots organization started by farmers working on this issue, and therefore a new animal advocacy organization may not be best placed to do this.

Overall, these conversations updated us against recommending a new organization work on this issue at the EU level; the good work being done by Eurogroup for Animals and its member organizations, and the recent support of the French presidency may make this policy more likely to happen anyway. The counterfactual impact of a new organization will therefore be lower.

### Stephanie Ghislain, Eurogroup for Animals

We also spoke with Stephanie about our geographic assessment and the common objections and concerns about banning low welfare imports.

Stephanie was supportive of a new organization working in Switzerland or New Zealand. If this campaign was successful, she said that the precedent-setting effect on the EU might be stronger in Switzerland than in New Zealand given the closer relationship between the EU and Switzerland, but that the precedent would be strong in either case. Stephanie thought that there were no other countries (other than the EU and the UK which we have already ruled out) that have high enough welfare standards to consider advocating on this issue in.

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<sup>8</sup> Mirror clauses would guarantee that imported animal products are produced under the exact same welfare standards that are imposed in the EU.

We then asked Stephanie about the four most common objections we have seen about banning low-welfare imports, and how concerned we should be about them:

1. We would have to renegotiate all of our trade deals.
  - This is not the case for banning low-welfare imports – any legislation you pass at the unilateral level will not impact your trade deals and there is nothing in any trade deal that prevents a country from adopting unilateral measures and implementing a measure on all imports from all countries.
  - This is the case for conditional liberalization<sup>9</sup> as this would mean renegotiating and agreeing on tariffs.
2. A ban on lower-welfare imports is very difficult and resource-intensive to enforce.
  - This is more of a valid concern, but the EU has been able to successfully do this in the past for their slaughter legislation using audits, so a similar system could be implemented by the importing country to ensure enforcement.
  - You could also rely on certification and only import certified products.
3. We shouldn't expect the same standards from developing countries (and in some cases it may be unfair to do so).
  - Many trade agreements include a clause for animal welfare cooperation – this would allow the high-welfare, importing, developed country to support and assist the lower-welfare, exporting, developing countries in improving their animal welfare.
  - You could also make standalone agreements with these countries on animal welfare that are focused around cooperation and support, and assist them through these channels.
  - This support could include technical cooperation, transfer of expertise and transfer of technology, such as capacity building on the different forms of non-cage systems for farmed animals and on how to successfully operate such non-cage systems.
4. The price of animal products will increase in the importing country.
  - Stephanie hasn't seen much data evaluating the impact of these policies on prices but said that she could imagine the price increase not being as large as one may expect, as the industry could take

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<sup>9</sup> Conditional liberalization would impose differential tariffs on imports based on animal welfare standards. This would mean that only animal products with equivalent or higher animal welfare standards will benefit from zero tariffs.

advantage of economies of scale. Also, it is important to note that the biggest components of the price of animal products aren't usually animal welfare standards, instead it is food and labor costs. Therefore the impact of a shift from caged to cage-free housing on prices may be smaller than you'd intuitively think

- A cage-free egg from Brazil, for example, will still remain cheaper than a cage-free egg from the EU or New Zealand.
- Of course, prices will increase a bit but it is also important to note that consumers do generally have a willingness to pay for improved welfare.

## 6.2 The UK

We spoke with four experts about a new organization working in the UK.<sup>10</sup> Two experts were from the [Trade and Animal Welfare Coalition](#) (TAWC) and two wished to remain anonymous. Their views will be summarized as a whole rather than individually, by request of the experts.

The majority of experts believed that there is no legislative opportunity for banning low-welfare imports into the UK right now, mostly due to a lack of political will. The examples used by experts to illustrate this lack of political will were:

1. The fact that the UK government is currently backtracking on their commitment to ban fur and foie gras imports.
  - a. If the government is not willing to ban the import of these specific products that have more of a precedent for import/sales bans across the globe (see the [Case study analysis above](#)), then it seems unlikely that they would be willing to ban the import of all low-welfare products.
2. The recent lobbying defeat in trying to get an enabling power<sup>11</sup> on trade and import bans.
  - a. This lobbying defeat suggests a lack of appetite for advocacy and change on this issue.

It was suggested that this lack of political will was likely due to not wanting to put off potential trade partners and/or weaken their position during post-Brexit trade negotiations.

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<sup>10</sup> Please note that one of the experts we spoke with about working in the UK also spoke with us about working at the EU level so we have summarized their views in both subsections.

<sup>11</sup> An enabling power would allow Defra to introduce import bans without a parliamentary vote.

One of the experts suggested that although there is no legislative opportunity, there are opportunities via free trade agreements. However, we are less excited about a new organization working on this issue at the trade agreement level as it is more likely that the co-founders would need trade and/or legal expertise to do this well, and because you will be able to impact much fewer animals with this approach (especially as the UK has already negotiated many of its trade agreements which means that there are many countries we would be unable to impact, e.g., Australia and Japan).

Most experts also expressed a view that a new organization likely wouldn't have much of a value add and may even confuse things. This is mostly because there are already organizations working in this space (eg., TAWC and RSPCA) so it likely makes more sense for them to continue their advocacy rather than add a new organization into the mix. Moreover, these organizations already have connections and are already well established, and therefore the civil service/Defra wouldn't have much reason to work with a new organization on this issue when they could work with these existing organizations instead.

Overall, these conversations updated us against recommending a new organization work on this issue in the UK.

### 6.3 New Zealand

We spoke with two experts from the [New Zealand Animal Law Association](#) about a new organization working in New Zealand.

Both experts were very positive about seeing a new organization working on this issue in New Zealand as work in this space is currently very neglected, with no one working full-time; there is currently only Saar Cohen-Ronen of New Zealand Animal Law Association, who volunteers his weekends. When considering the ideal co-founders of this organization, they highlighted that this is a legal issue so it would be beneficial to have co-founders with legal expertise, although not necessary. They also highlighted the importance of meeting with people in person. It would therefore be ideal to find local co-founders, and if that was not possible then ensuring that the co-founders are in-country as much as possible, or making a local hire who will be in-country at all times. Alternatively, this organization could partner with local organizations who may be willing to have meetings on its behalf.

It was highlighted that New Zealand could be a particularly promising country for a new organization working on banning low-welfare imports for the following reasons:

- New Zealand would like the reputational value of being the first country to do this – it sees itself as a world leader in animal welfare,<sup>12</sup> so being able to set this precedent would be great.
- New Zealand is quite influential in multilateral institutions. As a result, if New Zealand does something in animal welfare then other countries pay attention and therefore the precedent setting of success on this issue in New Zealand could be quite influential.
- New, small organizations can make a difference on this issue<sup>13</sup>, especially if they cooperate with and partner with existing organizations in the country.
- New Zealand is a smaller country than the other countries we are considering and so it is easier to assess your impact and track the progress you are making, eg., you can get the media and politicians talking about it and track this easier. Therefore, New Zealand is quite a tractable and measurable country to do animal welfare work in.
- When asked why progress hasn't already been made on this issue in New Zealand, we were greeted with the usual response of hesitancy about breaching World Trade Organization rules rather than a specific example of a lack of political will, as is the case in the UK, for example.

Stakeholder opinions seemed mostly positive, too.

- Farmers are supportive of import bans as they feel wronged at the potential of being outcompeted by lower-welfare imports, especially since New Zealand's farrowing crates ban.<sup>14</sup>
- The general public is unlikely to have considered this issue. However, it seems reasonable that this is something that the public could support as it buys into patriotism.
- Within the New Zealand National Party and even in some sectors of the Labour Party there is a strong farming influence, so they could be supportive

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<sup>12</sup> New Zealand, the EU, and the UK all seem to fight over this title

<sup>13</sup> This was a concern raised in the UK where Defra wouldn't have much reason to speak with a new, small organization working in the space as bigger, more established organizations with existing connections were already working on this issue

<sup>14</sup> New Zealand plans to phase out farrowing crates by December 2025 ([Ministry for Primary Industries, 2022](#)).

if they see farmers are in support. This may mean cross-party support for an import ban.

Saar Rohen-Conen highlighted that it would be very promising to build a coalition of animal advocacy organizations, lawyers, and the industry to work on this issue together. He very much welcomes a new organization in this space to help lead this coalition and give any help that they can on writing a legal opinion to present to the government and help to get the industry on board.

He also thinks that it could be promising to work with the New Zealand National Party, which is currently the opposition and are generally more pro-farmer, to get them on board and commit to this. He believes that if the New Zealand National Party, animal advocacy organizations and the industry are aligned on this, then this will force the Labour Party, the party currently in power, to also support this issue. Particularly as the next election is expected to be very competitive and the Labour Party wouldn't want to do anything that might lose farmers' votes.

Saar also mentioned that they could offer their charity, the New Zealand Animal Law Association, as a platform. A new branch of NZALA that focuses specifically on this issue could be started and the co-founders could work under this branch instead of having to set up their own charity.

Overall, these conversations updated us in favor of recommending a new organization work on this issue in New Zealand. Now seems like a uniquely good time for advocacy on banning low-welfare imports following the farrowing crates ban, and there is little work being done by existing organizations but a lot of support from them. There are also many promising options to consider in working with them.

## 7 Cost-effectiveness analysis

Our [cost-effectiveness analysis](#) models the impact of an import ban in New Zealand. We consider both government and charity costs, and our endline metric is the total number of welfare points<sup>15</sup> (WPs) affected and the number of welfare points affected per dollar by this intervention.

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<sup>15</sup> Welfare points are a metric created by Charity Entrepreneurship to evaluate the impact of animal welfare interventions. You can find out more about how this metric was created on [the EA forum](#) as well as an example of how we have used welfare points in the past [to compare the lifetime welfare of different animals](#).

This policy change looks very cost-effective. We summarize the main end-line metrics of this cost-effectiveness analysis in the table below:

Policy	Total WPs affected (if campaign is successful)	Total WPs affected (expected)	WPs affected/\$ (Charity costs)	WPs affected/\$ (Government and charity costs)
<a href="#"><u>Banning low welfare animal product imports in New Zealand</u></a>	1,793,574,205	315,087,360	185.99	23.08

In the sections below we will discuss the inputs used in this model, how they were estimated, why we used them, and how they are used together to calculate the end-line metric of the number of welfare points affected per dollar.

## 7.1 Costs

The charity costs were estimated by the Charity Entrepreneurship team and were held constant throughout all of the cost-effectiveness analysis models made during this research round. These costs were estimated based on the country that the intervention was being implemented in (developed or developing) and whether the intervention was a policy change or direct implementation (e.g., working with farmers directly).

The following costs will be modeled:

	Developed country (Policy)	Developing country (Policy)	Developing country (Direct implementation)
Year one	\$100,000	\$100,000	\$100,000
Year two	\$200,000	\$165,000	\$250,000
Year three and beyond (Operating at scale)	\$300,000	\$225,000	\$400,000

We based our estimation of government costs on the assumption that the New Zealand government would be responsible for ensuring the enforcement of this import ban, for example through audits.<sup>16</sup>

It was quite difficult to find any data on the cost of audits, particularly at an international level, and so instead we based this cost estimate on the cost of cross-border compliance with organic standards in the EU. We found that ensuring this compliance usually costs less than 1% of product value ([Grethe, 2007](#)), therefore we assumed that enforcement of an import ban would cost 1% of the total value of all animal product imports into New Zealand which can be found on FAOSTAT ([FAOSTAT, 2020](#)<sup>17</sup>).

## 7.2 Effects

The overall impact of this policy change is defined in terms of the total number of welfare points affected per dollar. To calculate this we used the cost estimates outlined above and the following inputs:

- The total number of non-compliant individuals imported from countries ranked D: this is the total number of animals that are imported across all animal products considered (fish, poultry meat, swine meat, sheep and goat meat, wool, bovine meat, eggs, and milk) from countries ranked D on World Animal Protection's Animal Protection Index's "Protecting animals used in farming" indicator.

This was calculated using tonnage data from the FAO and the estimated mean weight of these products to determine the number of individuals imported. We use poultry meat as an example:

- 692 tonnes of poultry meat was imported into New Zealand in 2020 ([FAOSTAT, 2020](#)<sup>18</sup>)

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<sup>16</sup> Note that other enforcement mechanisms would be available, such as making corporations (retailers, restaurants, etc.) ensure that the animal products that they are purchasing from abroad are meeting New Zealand animal welfare standards. However, we have decided not to recommend this enforcement mechanism as then these corporations might become opposed to this policy and advocate against it.

<sup>17</sup> Note that to access this data you need to select the following parameters on FAOSTAT's interface:

- Reporter country: New Zealand
- Partner countries: Select all (except for New Zealand)
- Elements - Import value
- Items - "Meat, chicken", "Meat, chicken canned", and "Meat, duck"
- Years - 2020

<sup>18</sup> Note that to access this data you need to select the following parameters on FAOSTAT's interface:

- Reporter country: New Zealand
- Partner countries: Select all (except for New Zealand)
- Elements - Import quantity
- Items - "Meat, chicken", "Meat, chicken canned", and "Meat, duck"

- 6.36% of this was imported from countries ranked D – this is a total of 44 tonnes ([Cox, 2022](#))
  - Estimated mean weight of poultry meat – 1.9kg of poultry meat was produced per animal in New Zealand in 2018 ([Our World in Data, 2020a](#))

Using this information we can calculate that 23,158 birds were imported into New Zealand from countries ranked D. Similar data for all animal products considered can be found in individual tabs in [the main cost-effectiveness analysis spreadsheet](#).

- The total number of non-compliant individuals imported from countries ranked E or below: similar to above, this is the total number of animals that are imported across all animal products considered (fish, poultry meat, swine meat, sheep and goat meat, wool, bovine meat, eggs, and milk) from countries ranked E or below on World Animal Protection's Animal Protection Index's "Protecting animals used in farming" indicator.
- Welfare point difference between New Zealand and country ranked D or below: to calculate this we extrapolated previous welfare point estimations we had made for battery-caged layers and enriched-caged layers.
  - We have estimated that battery-caged layers have a welfare point score of -57 and that enriched-caged layers have a welfare point score of -46 ([Charity Entrepreneurship, 2018c](#); [Charity Entrepreneurship, 2018d](#)).
  - We have assumed that countries ranked D will have battery-cage production and countries ranked C (like New Zealand) will have enriched-cage production such that the difference between New Zealand and country ranked D for eggs is 11 welfare points.
    - That is, countries ranked C have ~1.24x higher welfare than countries ranked D.
  - We then used this 1.24 ratio to calculate the welfare point score of animals produced in countries ranked C using the previous estimates<sup>19</sup> we have for animals produced in countries ranked D (the average factory-farmed animal).

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● Years – 2020

<sup>19</sup> Links to these previous estimates can be found here: [farmed fish](#), [broiler chicken](#), layer hen ([battery-caged](#) and [enriched-caged](#)), [beef cow](#), and [dairy cow](#).

- As we didn't have any previous welfare point estimations for animals farmed in countries ranked E or below, we assumed that the same ratio applied between the welfare difference of countries ranked C and D and countries ranked D and E – that is, countries ranked E or below have ~1.24x lower welfare than countries ranked D.

Putting all of this information together, we have the following welfare point matrix:

	WP score of animal produced in country ranked C	WP score of animal produced in country ranked D	WP score of animal produced in country ranked E or below
<b>Fish</b>	-36	-44	-55
<b>Broiler</b>	-45	-56	-69
<b>Layer</b>	-46	-57	-71
<b>Sheep/goat<sup>20</sup></b>	-16	-20	-25
<b>Pig<sup>21</sup></b>	-31	-38	-47
<b>Beef cow</b>	-16	-20	-25
<b>Dairy cow</b>	-27	-34	-42
<b>Sheep (wool)</b>	-16	-20	-25

This then gives us the welfare point difference between animals produced in New Zealand (ranked C) and animals in countries ranked D or E or below.

For example, the welfare point difference between poultry raised for meat in New Zealand and a country ranked D is 11 WPs, and the difference between poultry raised for meat in New Zealand and a country ranked E or below is 24 WPs.

<sup>20</sup> Note that we have not done a previous welfare point score estimation for sheep so we have assumed that their welfare point score is the same as for beef cows.

<sup>21</sup> Note that we also have not done a previous welfare point score estimation for pigs so we have assumed that their welfare point score is an average of that of broiler chickens and beef cows.

- Lifespan: our welfare point estimates are estimates of the average well-being of an animal across its lifetime, but it doesn't account for the lifespan of an animal. Therefore, we account for this as a separate input in our cost-effectiveness analysis models. This is important as, for example, although broiler chickens and battery-caged laying hens have very similar welfare point scores, we may prefer to avert the suffering of a laying hen as their life is longer (0.1 years for a broiler chicken vs. 1.38 years for a laying hen).
- Sentience: our welfare point estimates also do not account for the estimated sentience of an animal, so we also account for this as a separate input in our cost-effectiveness analysis models. We think that this is an important parameter to include to compare across interventions that are evaluating working on different species as, for example, you may think that it is more important to work to improve chicken welfare than to improve fish welfare as you are more confident that chickens can suffer - we use estimated sentience to capture this. Our sentience estimates are informed by work from [Open Philanthropy](#) and [Rethink Priorities](#).
- Probability of success: we used an average probability of success of 17.57% as calculated from the case studies of other import bans (summarized in [Case studies](#) and detailed in [Annex 1](#)).
- Expected enforcement rate: We looked at compliance rates across the EU, the UK, and New Zealand in 16 different sources and took a weighted average of all of these to get an expected compliance rate of ~75% (all sources are listed in [the "Calculations" tab of the CEA spreadsheet](#) and included in the [References](#) section below).

Using these inputs, we calculated an estimate for the total number of welfare points that could potentially be averted by an import ban each year. Then, to estimate the overall impact of the charity over its lifetime, we also considered the following inputs:

- Time taken for the campaign to be a success: we used the average time taken until success - 5.2 years - as calculated from the case studies of other import bans (summarized in [Case studies](#) and detailed in [Annex 1](#)).

- A discount rate of 4%, as we were evaluating impact in the future and we wanted to evaluate impact in present value terms.

## 8 Implementation

### 8.1 Crucial considerations

Can we expect governments to enforce a complex import ban well?

We expect that the government will be able to enforce this import ban well for the following reasons:

- To successfully enforce this import ban, the government must monitor imports and penalize non-compliance. The New Zealand Customs Service already enforces existing regulations on many imported goods, and all importers need to register with Customs and submit an import entry or electronic cargo information ([Ministry for Primary Industries, n.d.](#)). Perhaps these existing systems for importing products could easily be utilized for this import ban.
- The EU has successfully managed to enforce its slaughter and slaughterhouse regulation abroad and ensure that imported products meet these standards. They have mostly done this through audits. The enforcement mechanism in this case is as follows:
  - Third countries must be approved (“listed”) before they can export animal products into the EU.
  - In order to be listed, a third country must apply for listing to the Commission and the application must be evaluated satisfactorily by the Commission. The evaluation involves both a desk-based assessment and, if necessary, an audit carried out by the Health and Food Audits and Analysis Directorate. These audits usually involve auditing the third country’s competent authorities as well as visits to the control authority, a number of regional and local authorities, laboratories and a number of accompanied site visits (e.g., to farms, processors, feed units, slaughterhouses and retailers; [European Commission, n.d.a.](#)).

- If a third country is listed, then it can propose establishments for listing. It is only these establishments that can export animal products into the EU. Compliance with EU standards must be checked and guaranteed by the competent authorities of the third country before the country can propose that the establishment is listed and appears in the list published by the Commission ([European Commission, n.d.b](#)). A similar system could be implemented in New Zealand.
- There may be some concern about determining equivalency between New Zealand animal welfare standards and the animal welfare standards of the exporting country. For example, a production system may be superior to New Zealand's standards on one metric (e.g., stocking density) but inferior on another (e.g., mutilations without analgesia). Therefore, a set of comprehensive standards must be one which considers these potential compromises.

However, we note that compromises such as these are often decided on and implemented across trade policy in many different areas, such as labor rights and greenhouse gas emissions. A current example comes from the EU, which is designing a policy – the Carbon Border Adjustment Mechanism – to increase the price of imports with high greenhouse gas emissions ([European Commission, 2021](#); [EUR-Lex, 2021](#)). This 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.

Should we expect developing countries to meet the welfare standards of developed countries? What will the impact of an import ban be on developing country farmers?

In our theory of change we assume that New Zealand will help farmers in developing countries to improve their welfare standards such that they can still export their products to New Zealand. Therefore, we may expect that there will be no change in the size of these developing countries' export markets. In fact, this might help to increase the size of these developing countries' export markets in the long term as it may allow them access to other high-welfare countries (in particular the EU, the UK, and Switzerland where similar import bans may happen in the future).

We expect that this help from New Zealand will come in the form of technical cooperation, transfer of technology and expertise, and capacity building. This is summarized by Eurogroup for Animals in their recent report detailing how to implement an import ban on caged animal products into the EU as follows: “The EU should put in place targeted support measures, especially aiming at farmers in developing countries; such as technical assistance, transfer of technology, and capacity building on the different forms of non-cage systems available for pigs, laying hens, rabbits and other farmed animals. Such assistance would help farmers in partner countries to operate non-cage systems successfully.” ([Eurogroup for Animals and Compassion in World Farming, 2022](#)) There exists many mechanisms for this support:

- Many trade agreements include a clause for animal welfare cooperation. Or future trade agreements could be written to include this clause.
- Standalone agreements could be made with these countries on animal welfare that are focused around cooperation and support and assist them through these channels.

It is important to note, however, that even with this support from New Zealand, the costs of high-welfare production will be an increase in the cost of production that may drive some farmers out of business. Moreover, since there is a correlation between per-capita income and farmed animal welfare across countries, there is a risk that New Zealand may end up importing more animal products from developed countries- as it will be easier for them to prove that they would meet New Zealand’s animal welfare standards. Therefore, this could result in employment opportunities moving from developing countries to developed countries. We hope that the cooperation and targeted support measures outlined above would go some way in preventing this.

### What will the impact be on the price of animal products?

We were unable to find a formal analysis of what the impact on the price of animal products would be, though we note that the average price of animal products will increase, as high-welfare production is more expensive. However, it is important to note the following:

- The price increase may not be as large as one may expect, as the industry could take advantage of economies of scale.

- Moreover, the biggest components of the price of animal products are food and labor costs, for example feed costs make up 70% of the overall costs of poultry production ([Alltech, n.d.](#); [The Poultry Site, 2007](#)) and labor costs make up 11-15% of overall costs ([Gale and Arnade, 2015](#)). Therefore, impact on prices of a shift from caged to cage-free housing, for example, may be smaller than you'd intuit.
  - Relatedly, a cage-free egg from a developing country will still remain cheaper than a cage-free egg from a developed country, as food and labor costs are cheaper and so we would not expect the price of imported products to meet those of locally produced animal products.

Even if the average price did increase, it is important to note that consumers are generally willing to pay for increased animal welfare ([Lusk, 2018](#)).

## 8.2 Talent

As this is a policy issue, co-founders will need to be comfortable with policy work – ie., a focus on building connections and influencing, an acceptance of a significant risk of failure yet higher payoff, and long feedback loops. A legal background could be a useful "nice to have" for this intervention, but is not a necessity.

## 8.3 Access

### Information

There is generally a higher barrier to information in the animal space than there is in the global health and development space. However, trade data and animal welfare legislation has been relatively easy to access and evaluate. We have made use of existing tools – in particular World Animal Protection's Animal Protection Index – which has made the process of comparing legislation across the globe much more simple.

### Government

From speaking with experts, we expect that the government in New Zealand would be willing to speak with a new organization working on this issue.

## 8.4 Funding

We expect that this intervention would be relatively easy to get funding for, in particular from Effective Altruism aligned donors. For example, Open Philanthropy have made two grants - totalling ~\$1.6 million - to Eurogroup for Animals, supporting their work on trade policy; and the EA Animal Welfare Fund has made a grant to Sentience Politics for their “Abolish Factory Farming” initiative, which includes a clause on banning low welfare imports ([Open Philanthropy, 2019](#); [Open Philanthropy, 2022](#); [EA Animal Welfare Fund, 2021](#)).

## 8.5 Scalability

One of the main paths to failure for this organization is its scalability. We only considered three other countries - the EU, the UK, and Switzerland - to have high enough welfare standards that we'd want to see them enforced across the globe. There are ongoing campaigns in all of these countries, though the size and effectiveness of these campaigns differ between countries.

It may be worth reconsidering working in these countries, after New Zealand, in the following circumstances:

- The EU - The current momentum from the French Presidency and Eurogroup for Animals does not result in an import ban being implemented for products from caged animals, though you should evaluate whether this is a sign that there is little appetite for this trade policy in the EU (though it is also worth noting that this appetite may change if this campaign was successful in New Zealand as this could have some precedent setting affect).
- The UK - A party other than the Conservative Party is in power as they may have more appetite for change on this issue.
  - As noted in the geographic assessment above, Animal Ask has suggested that it may be promising for an organization to focus on securing commitments from parties in their manifestos for the upcoming general election, as perhaps parties other than the Conservative party would have more appetite for this ([Springlea, 2022](#)). It may also be the case that if commitments are secured from all other parties, then the Conservatives may be forced to pursue this issue in the future or risk losing the vote of farmers who have generally been a big supporter base in the past.

- Switzerland – The “Abolish Factory Farming” initiative doesn’t pass when it is voted on in September or November 2022<sup>22</sup>. If this is the case, then there may be a benefit to proposing an initiative specifically focused on an import ban (as it could be the case that people were supportive of this aspect of the “Abolish Factory Farming” initiative but not others and therefore ultimately voted against).
  - However, you should consider whether Sentience Politics would be open to launching this initiative themselves,<sup>23</sup> as they may have a comparative advantage given their experience in the policy space in Switzerland.

## 8.6 Externalities

There are two main positive externalities that should be further discussed here.

- First is the potential precedent-setting effect that this policy change could have, if successful. It is common to hear from governments that they are concerned about tackling this issue as it is not clear whether it is compatible with the World Trade Organization’s rules. New Zealand could be a clear case study that progress can be made in this space and that even if disputes are raised, the World Trade Organization will rule that import bans of this kind are compliant with their rules under the public morals exemption. This could have a big impact in countries such as the EU, the UK, and Switzerland and may encourage them to also make progress in this space.
- Second is how this could impact improvements to animal welfare legislation in the future. This import ban will also apply to future legislation – that is, when there are future welfare improvements made in New Zealand, having this import ban in primary legislation will mean that any products that do not meet these future standards will also be restricted. This might enable the government to increase domestic standards even further than they counterfactually would have; there could be greater acceptance of higher standards among the local farming community if such standards are applied to imports in parallel, as they will no longer have the concern of being out-competed by imports.

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<sup>22</sup> When this report was originally written in April-May 2022 it was uncertain when this vote would happen. However, as we are copyediting this report ready for publishing in October 2022, we can now unfortunately report that this initiative was voted on on 25th September 2022 where the initiative was rejected with 62.86% of voters voting against ([Mantovani, 2022](#)).

<sup>23</sup> Note that Animal Ask has identified this as the most promising intervention in Switzerland ([Bridgwater, Gittins, and Odene, 2021](#)).

The main potential negative externalities of this intervention have been discussed in the [Crucial considerations section](#) above – namely, these are: the potential negative impact that this import ban could have on farmer livelihoods in developing countries and the impact of a price increase in New Zealand.

## 9 Conclusion

Overall, our view is that advocacy for an import ban on animal products that do not meet New Zealand's animal welfare standards is an idea worth recommending to future charity founders.

## Annex 1 – Case Studies

### US-Shrimp – success after 4 years (1991-1995)

- **Background:** “As the domestic conflict over the use of TEDs in U.S. shrimping operations was raging, efforts were underway to impose similar gear regulations on foreign shrimp trawlers. In 1989, Congress enacted Section 609 of Public Law 101-162 that requires all shrimp importing nations be certified as having sea turtle protection programs compatible with those in the U.S. Under Section 609 a complete ban must be placed on importation of shrimp harvested from any uncertified nation” ([Salz, 1998](#))
- **1991:** “Specific guidelines for the implementation of Section 609 were first issued in 1991. Due to narrow interpretations of Section 609 by the Bush and Clinton Administrations, only Caribbean and Western Atlantic countries had to be certified as turtle-safe. While Section 609 was clearly an important step towards sea turtle recovery, the narrow interpretation of this law did nothing to reduce high sea turtle mortality rates from shrimp fisheries in the Pacific and Indian oceans. Shortly after these guidelines were released several environmental organizations filed a class-action suit against the U.S. government. Earth Island Institute, among others, claimed that the guidelines limiting the geographic scope of turtle protection were illegal and not in accordance with Section 609 or the ESA” ([Salz, 1998](#))
- **1995:** “In December of 1995, more than three years after suit was filed, the U.S. Court of International Trade (CIT) ruled in favor of the environmental groups. The CIT directed the U.S. Government to ban importation of shrimp or shrimp products from any country where wild harvested shrimp were being caught with nets that adversely affected sea turtle conservation efforts” ([Salz, 1998](#))

### Seal Pups Directive – success after 7 years (1976-1983) -> also lead to the EC-Seal Products ban in 2009

- The EU ban was the result of large anti-sealing campaigns and appeals to the general public about the morality of seal hunting, which were led by environmental groups such as Greenpeace ([Hearther, 2019](#))
- **1976:** Greenpeace formed in 1971 and by 1976 it was involved in unofficially leading the anti-sealing movement with the International Fund for Animal Welfare (IFAW) ([Burke, 2021](#))

- **1982-1983:** The ban was agreed on in 1982 and imposed in 1983 by the European Economic Community (EEC) ([Burke, 2021](#))
- **2009:** EC-Seal products ban ([World Trade Organization, 2014](#))

#### US-Tuna II - success in 4 years (1986-1990)

- **1986:** Earth Island Institute and the International Marine Mammal Project started their campaign which involved asking consumers to boycott tuna ([Allen, 2021](#); [EUROPEAN CETACEAN BYCATCH CAMPAIGN, n.d.](#))
- **1987:** “Biologist Sam LaBudde went undercover on a commercial tuna fishing vessel to document the ship’s offshore activities. LaBudde conducted his 5 months of secret surveillance with the support of two environment organizations, the Earth Island Institute and the Marine Mammal Fund. What LaBudde captured was horrifying. Tuna fishing vessels were encircling dolphins in pursuit of yellowfin tuna. While the tuna were caught, the dolphins often drowned in the fishing nets.” ([Allen, 2021](#))
- **1988:** LaBudde’s undercover footage was published and made it onto national television in March 1988 ([Allen, 2021](#))
- **1990:** The “Dolphin-Safe” label was launched and the U.S. enacted the Dolphin Protection Consumer Information Act to regulate “dolphin-safe” labeling practices ([Allen, 2021](#); [Phillips, 2015](#))
  - This act created a standard for tuna imported or exported in the United States. Consumers responded to the new labeling, and sales dropped for tuna products without the "Dolphin Safe" label ([Global Nonviolent Action Database, n.d.](#))

#### European Community ban on importing furs caught in countries that permit the use of leg-hold traps - success in 7 years (1990-1997)

- **1990:** There are mentions of a campaign being launched in 1990 in The Animal Welfare Institute’s quarterly newsletter ([Animal Welfare Institute, 1990](#))
- **1991:** EU passes legislation which prohibits EU member states from using leg-hold traps. This legislation also states that the EU will stop importing fur from animals caught in leg-hold traps by 1 January, 1995 ([Michaud, 1997](#))
- **1994:** The EU postpones implementation of its import ban until 1 January, 1996 ([Mann, 1995](#))
  - Many animal welfare organizations objected to this postponement and campaigned against it

- **1995:** The EU again postpones implementation of its import ban until 1 January, 1997 ([Mann, 1995](#))
- **1997:** Import ban is implemented ([Mann, 1995](#))

#### Prop 12 - success in 1 year (2017-2018)

- **2017:** On August 29, 2017, HSUS introduced the ballot initiative ([Duggan, 2017](#))
- **2018:** On November 6, 2018, the ballot initiative was approved with an approval rating of 62.66% to 37.34% ([BALLOTPEDIA, n.d.](#))

#### Banning low-welfare imports into the EU - still in progress with some successes along the way

- Eurogroup for Animals - still in progress for 10-40 years - They have been working at the EU level for 40 years, but their lobbying and campaigning started approximately 10 years ago (before this they mostly worked at a technical and advisory level; Source: *Conversation with Stephanie Ghislain*)
- RSPCA - still in progress for ~17 years - "It [the EU-Mercosur trade agreement] is the first time animal welfare standards have been incorporated into tariffs in an EU trade agreement, and something the RSPCA has been advocating for 15 years" ([Busby, 2019](#))

Though there have been some successes along the way, for example:

- EU-Mercosur trade agreement (still under negotiation) - Under this FTA, eggs imported from Brazil, Argentina, Paraguay and Uruguay to member states will only be duty-free if the hens are kept in line with EU standards ([Busby, 2019](#))
- [2002 EU-Chile trade agreement](#) - this trade agreement successfully improved slaughterhouses in Chile leading to better animal welfare and increased trade in higher-welfare products into the EU ([Ghislain and Vega, 2021](#))
- [2011 EU-Korea trade agreement](#) - this trade agreement foresees the exchange of information, expertise and experiences on animal welfare, the cooperation on developing standards in international fora, - notably on stunning and transport - as well as the adoption of a working plan for these activities ([eur-lex, 2011](#))
- [2014 EU-Ukraine trade agreement](#) - this trade agreement granted Ukraine substantial trade preferences on animal-based products while

committing the country to align its rules, notably on animal welfare, with the EU's ([Eurogroup for Animals, 2019](#))

- [2018 EU-Mexico trade agreement](#) - this trade agreement was the first with a standalone chapter on animal welfare and antimicrobial resistance, with a reference to animal sentience, a commitment to better implement OIE standards and an overarching goal to enhance the protection and the welfare of animals ([Eurogroup for Animals, 2020](#))

### Banning low-welfare imports into Switzerland - still in progress with some successes and failures along the way

- Fair Food Initiative - Failure in three years
  - **2015:** Initiative launched in 2015 ([swissinfo.ch, 2015](#))
  - **2018:** Voted on and rejected in 2018 ([Bundeskanzlei BK, 2018a](#))
    - 38.7% for
    - 61.3% against
- Sovereign Food Plan - Failure in two years
  - Submitted in 2016 by an initiative committee sponsored by the farmers' union Uniterre ([Bundeskanzlei BK, 2018b](#))
  - Voted on and rejected in 2018 ([Bundeskanzlei BK, 2018b](#))
    - 31.6% for
    - 68.4% against

Other initiatives relating to imports and their progress (color-coded for failure, still in progress, and success):

Motion number	Year submitted	Description	Outcome (as of April 2022)
<a href="#">09.428</a>	2009	Import ban on fur products manufactured in a manner that is cruel to animals	National Council <ul style="list-style-type: none"> <li>● For: 87 votes</li> <li>● Against: 64 votes</li> </ul> Council of States <ul style="list-style-type: none"> <li>● For: 12 votes</li> <li>● Against: 22 votes</li> </ul>
<a href="#">10.4104</a>	2010	Immediately stop imports of reptile leather from Indonesia. Work out the legal basis for an import ban on reptile leather	National Council <ul style="list-style-type: none"> <li>● For: 91 votes</li> <li>● Against: 73 votes</li> </ul>

		products from cruel production	Council of States <ul style="list-style-type: none"> <li>• For: 18 votes</li> <li>• Against: 18 votes (rejected by casting vote of the president)</li> </ul>
<a href="#">11.3635</a>	2011	Import ban on seal products	<ul style="list-style-type: none"> <li>• For: 132 votes</li> <li>• Against: 28 votes</li> </ul>
<a href="#">13.3331</a>	2013	Ban import of shark fins	National Council <ul style="list-style-type: none"> <li>• For: 160 votes</li> <li>• Against: 19 votes</li> </ul> Council of States <ul style="list-style-type: none"> <li>• For: 15 votes</li> <li>• Against: 22 votes</li> </ul>
<a href="#">15.3832</a>	2015	Prohibit the importation of products from animals that have been subjected to ill-treatment	National Council <ul style="list-style-type: none"> <li>• For: 4 votes</li> <li>• Against: 37 votes</li> </ul>
<a href="#">19.4425</a>	2019	Issue an import ban for fur products produced with cruelty to animals	National Council <ul style="list-style-type: none"> <li>• For: 144 votes</li> <li>• Against: 31 votes</li> </ul> Council of States <ul style="list-style-type: none"> <li>• Not yet dealt with</li> </ul>
<a href="#">19.4583</a>	2019	Establish import bans for animal products, the production of which are prohibited in Switzerland	Written off because it was not dealt with by the Council within two years
<a href="#">20.3021</a>	2020	Issue an import ban for foie gras produced in a manner that is cruel to animals	National Council <ul style="list-style-type: none"> <li>• For: 119 votes</li> <li>• Against: 61 votes</li> </ul> Council of States <ul style="list-style-type: none"> <li>• Not yet dealt with</li> </ul>

Please note that this table was copied from Animal Ask's "Imports to meet Swiss animal welfare standards" report ([Bridgwater, Gittins, and Odene, 2021](#)).

#### Banning low-welfare imports into the UK - still in progress

- A few organizations (RSPCA, TAWC, and other Eurogroup For Animals UK member organizations) are working on banning low-welfare imports into the UK, but this is still yet to happen.

## Fur import bans

- Seal fur (countries other than the EU and Switzerland which are already noted above)
  - India - success in four years (2014-2018)
    - In an article celebrating the ban on the import of seal fur and skins in 2018, the managing director of HSI/India states “We are delighted that our appeal to the Government of India to take a stand against this cruelty has produced a result after four long years.” ([Humane Society International, 2018](#))
  - Russia - success in two years (2009-2011)
    - **2009:** Russia bans seal slaughter in Russia. Campaign launched by PETA calling for Russia to ban the import of seal products too ([Kretzer, 2011](#))
    - **2011:** Russia bans import of seal products ([Kretzer, 2011](#))
  - Taiwan - success in three years (2010-2013)
    - 2010: An article from 2010 titled “Environmentalists call for ban on seal products from Canada” was found in the news ([Focus Taiwan, 2010](#))
    - 2013: “The Legislative Yuan passed a revision to Article 24 of the Wild Animal Conservation Act on January 8, 2013, making Taiwan the first Asian nation to ban the import of marine mammals and their products.” ([Lin & O'Donnell, 2013](#))
- Other fur-bearing animals
  - Israel - success after 12 years
    - In an article from the Jerusalem Post announcing the sales ban of 2021, the founder of the International Anti-Fur Coalition (IAFC) states “The IAFC has promoted a bill to ban the sale of fur in Israel since 2009, and we applaud the Israeli government for finally taking the historic leap towards making fur for fashion history” ([Reich, 2021](#))
  - HSI - still in progress in eight countries - The US, Australia, Canada, Germany, India, Italy, South Africa, and the UK
    - “In the United States, the Humane Society Legislative Fund, Humane Society International and the Humane Society of the United States have sent President Biden a letter—signed by 67 virologists, veterinarians and infectious disease and animal health experts—and a comprehensive white paper on the

evident, dangerous links between fur farms and zoonotic disease spread, urging our government to protect public and human health by supporting a global fur farming ban. HSI's offices in Australia, Canada, Germany, India, Italy, South Africa and the United Kingdom have also appealed to their respective governments." ([The Humane Society of the United States, 2021](#))

- It seems like their work in the UK and Canada is the most relevant, as on their "Fur" page they have a few calls to action and only their campaigns in the UK and Canada are listed here specifically; and it seems like their work in Canada is mostly focused on banning domestic fur farming rather than sales/imports ([Humane Society International, n.d.](#))
- Four Paws – still in progress in five countries – Austria, Germany, Bulgaria, South Africa, and Australia
  - “FOUR PAWS is committed to a fur-free Europe and, as the representative of the "Fur Free Retailer Program" in Austria, Germany, Bulgaria, South Africa and Australia, is instrumental in moving large fashion houses towards a fur-free future” ([FOUR PAWS in Germany, n.d.](#))
- Fur Free Alliance – still in progress in 35 countries – Belarus (two organizations), Belgium, Bosnia and Herzegovina, Bulgaria, Canada, China, Croatia, Czech Republic, Denmark (two organizations), Estonia, Finland (two organizations), France, Germany (two organizations), Greece, Hungary, Italy, Japan (two organizations), Latvia, Lithuania, Macedonia, Montenegro, the Netherlands, Norway, Poland, Portugal, Russia (two organizations), Serbia, Slovakia, South Africa, Spain, Sweden, Switzerland, Ukraine (three organizations), the UK (two organizations), and the US (three organizations).
  - We generated this list by looking at the member organizations of the Fur Free Alliance and the countries that they work in (excluding HSI and Four Paws as they are listed above separately) ([Fur Free Alliance, n.d.](#))

### Foie gras import bans

- The UK – still in progress/failure in five years (2017–2022)
  - **2017:** Animal Equality launches their campaign ([Lastrucci, 2022](#))
  - **2020:** In April 2020, following lobbying from Animal Equality and sympathetic MPs, Lord Goldsmith confirmed in a letter that “The

production of foie gras from ducks or geese using force feeding (known as gavage) raises serious animal welfare concerns” and is “incompatible with our domestic legislation” ([Animal Equality UK, n.d.](#))

- **2021:** Defra sources confirmed publicly in March 2021 that they are determined to implement a ban 'in the next few months' ([Animal Equality UK, n.d.](#))
- **2022:** UK government are trying to back out of their commitment to ban the import of foie gras ([Eardley & McSorley, 2022](#))
- **California - success in nine years (2003-2012)**
  - “In 2003, the Animal Protection and Rescue League and In Defense of Animals filed suit against Sonoma Foie Gras in California under the state's unfair business practices law, alleging animal cruelty. The farm also sued the two groups and four activists who documented conditions at the farm for trespass. The Legislature then intervened with a law allowing the farm to continue force feeding until the year 2012, after which point both the sale and production of foie gras has been illegal in California.” ([Wikipedia Contributors, 2022](#))
- **New York - success in seven years (2012-2019)**
  - **2013:** “Animal Legal Defense Fund and coalition sue the U.S. Department of Agriculture (USDA) for violating Poultry Products Inspection Act by allowing the sale of adulterated poultry, known as foie gras” ([Animal Legal Defense Fund, n.d.](#))
  - **2019:** New York City bans the sale of foie gras ([Animal Legal Defense Fund, n.d.](#))
- **India - success in two years (2012-2014)**
  - “The ban notification was issued by the Director General of Foreign Trade as a result of a two year campaign by animal protection organization, Animal Equality.” ([Humane Society International, 2014](#))
- **Israel - still in progress/failure in an unknown number of years**
  - “In August 2003, the Supreme Court of Israel ordered the Israeli Ministry of Agriculture to ban the force feeding of geese, effective 31 March 2005. The last appeal was withdrawn in October 2005, but the law was left unenforced until February 2006. Most protest activities were conducted by Animals Now, which also tracks the enforcement of the ban, and files complaints against farms that conduct illegal force feeding. In May 2013, a bill proposed by Knesset Member Dov Lipman

plans to prohibit all sales of the delicacy due to the controversial methods” ([Wikipedia Contributors, 2022](#))

- However, we couldn’t find any confirmation that this ban actually made its way into legislation. It doesn’t seem to have been written about since 2013 and Israel isn’t listed as a success in comprehensive overviews of the history of foie gras (such as [Animal Equality’s](#)) so it is assumed that this proposed bill didn’t go anywhere.

## References

- AHDB (2022). New Zealand trade and production. Available at: <https://ahdb.org.uk/trade-and-policy/news/new-zealand-trade-and-production#> (Accessed 27 September 2022).
- AHDB (n.d.). Lamb yield guide - Animal to carcass, to primals to cuts. Available at: [https://projectblue.blob.core.windows.net/media/Default/QSM/Tools/LambYieldGuide\\_200228\\_WEB.pdf](https://projectblue.blob.core.windows.net/media/Default/QSM/Tools/LambYieldGuide_200228_WEB.pdf) (Accessed 27 September 2022).
- Allen (2021). The Origin Of The “Dolphin-Safe” Tuna Label. Forbes. Available at: <https://www.forbes.com/sites/allenelizabeth/2021/04/28/the-origin-of-the-dolphin-safe-tuna-label/?sh=2fb9662e3c11> (Accessed 27 September 2022).
- Alltech (n.d.). High Production Costs in Poultry. Available at: <https://www.alltech.com/animal-nutrition/poultry/challenges/high-production-costs> (Accessed 14 October 2022)
- Animal Equality UK (n.d.). Ban Foie Gras | Animal Equality UK. Available at: <https://animalequality.org.uk/act/ban-force-feeding#> (Accessed 27 September 2022).
- Animal Legal Defense Fund (n.d.). Foie Gras - Animal Legal Defense Fund. Available at: <https://aldf.org/issue/foie-gras/#> (Accessed 27 September 2022).
- Animal Welfare Institute (1990). The Animal Welfare Institute Quarterly. Available at: <https://awionline.org/sites/default/files/uploads/documents/AWI-1990-Q.pdf> (Accessed 27 September 2022).
- Australian Wool Innovation Limited (2019). Australian Wool Production Forecast Report August 2019. Available at: <https://www.wool.com/globalassets/wool/market-intelligence/wool-production-forecasts/australian-wool-production-forecast-report-august-2019.pdf> (Accessed 27 September 2022).
- BALLOTPEDIA (n.d.). California Proposition 12, Farm Animal Confinement Initiative (2018). Available at: [https://ballotpedia.org/California\\_Proposition\\_12,\\_Farm\\_Animal\\_Confinement\\_Initiative\\_\(2018\)](https://ballotpedia.org/California_Proposition_12,_Farm_Animal_Confinement_Initiative_(2018)) (Accessed 27 September 2022).
- Bundeskanzlei BK (2018a). Vorlage Nr. 621 Übersicht. Available at: <https://www.bk.admin.ch/ch/d/pore/va/20180923/det621.html> (Accessed 27 September 2022).
- Bundeskanzlei BK (2018b). Federal Popular Initiative For Food Sovereignty. Available at: <https://www.admin.ch/gov/en/start/documentation/votes/20180923/initiative>

[-for-food-sovereignty.html](#) (Accessed 27 September 2022).

Bridgwater, Gittins, and Odene (2021). Imports to meet Swiss animal welfare standards. Animal Ask. Available at:

[https://c2b5df1e-0ba2-4201-9fb6-87e92e6ad2c0.usrfiles.com/ugd/c2b5df\\_d87d1cb14a5f4eb9a21aab6cf1e69799.pdf](https://c2b5df1e-0ba2-4201-9fb6-87e92e6ad2c0.usrfiles.com/ugd/c2b5df_d87d1cb14a5f4eb9a21aab6cf1e69799.pdf) (Accessed 27 September 2022).

Burke (2021). Rethinking the Process of the Anti-Sealing Movement Forty Years On. High North News. Available at:

<https://www.highnorthnews.com/en/rethinking-process-anti-sealing-movement-forty-years> (Accessed 27 September 2022).

Busby (2019). EU imposes hen welfare standards on egg imports for first time. The Guardian. Available at:

<https://www.theguardian.com/environment/2019/oct/02/eu-imposes-hen-welfare-standards-on-egg-imports-for-first-time> (Accessed 27 September 2022).

Casalicchio (2021). UK trade department blocks plan to ban food made to low standards. POLITICO. Available at:

<https://www.politico.eu/article/former-uk-trade-minister-liz-truss-london-defra-animal-welfare/> (Accessed 27 September 2022).

Charity Entrepreneurship (2018a). Is it better to be a wild rat or a factory farmed cow? A systematic method for comparing animal welfare. Available at:

<https://forum.effectivealtruism.org/posts/cimFBQbpjntoBAKCq/is-it-better-to-be-a-wild-rat-or-a-factory-farmed-cow-a-1> (Accessed 27 September 2022).

Charity Entrepreneurship (2018b). From humans in Canada to battery caged chickens in the United States, which animals have the hardest lives: results.

Available at:

<https://forum.effectivealtruism.org/posts/g57AjP4HqTmfFTAd/from-humans-in-canada-to-battery-caged-chickens-in-the> (Accessed 27 September 2022).

Charity Entrepreneurship (2018c). Laying Hens - Battery Cages Report. Available at:

<https://docs.google.com/document/d/1VYfWgqCQFmGNrtTyroXYRhrWaTaqFcf4pRHct16URlw/edit> (Accessed 27 September 2022).

Charity Entrepreneurship (2018d). Laying Hens - Enriched Cages Report. Available at:

[https://docs.google.com/document/d/17H-5FJOqas6xZZzXoQcYNXhyaslzDNCoDC3bLC3H\\_nU/edit](https://docs.google.com/document/d/17H-5FJOqas6xZZzXoQcYNXhyaslzDNCoDC3bLC3H_nU/edit) (Accessed 27 September 2022).

Cox (2022). Geographic assessment and CEA - Ban low welfare imports - New Zealand. Charity Entrepreneurship. Available at:

<https://docs.google.com/spreadsheets/d/1UIhUm1pAGFp8hsiAs-yLfQvSxGBKNgiiJO-Z9UG5pro/edit?usp=sharing> (Accessed 27 September 2022).

Department for Environment, Food & Rural Affairs (2021a). OUR ACTION PLAN FOR ANIMAL WELFARE. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/985332/Action\\_Plan\\_for\\_Animal\\_Welfare.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985332/Action_Plan_for_Animal_Welfare.pdf)

(Accessed 27 September 2022).

Department for Environment, Food & Rural Affairs (2021b). Review of the Welfare of Animals at the Time of Killing (England) Regulations 2015 Post Implementation Review. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/955031/welfare-animals-time-of-killing-regs-2015-post-implementation-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955031/welfare-animals-time-of-killing-regs-2015-post-implementation-review.pdf) (Accessed 27 September 2022).

Duggan (2017). New ballot initiative could increase California farm animal welfare standards. San Francisco Chronicle. Available at:

<https://www.sfchronicle.com/food/article/New-ballot-initiative-could-increase-California-12159349.php> (Accessed 27 September 2022).

Dullaghan (2020). Do countries comply with EU animal welfare laws? Rethink Priorities. Available at:

<https://rethinkpriorities.org/publications/do-countries-comply-with-eu-animal-welfare-laws> (Accessed 27 September 2022).

Dullaghan (2021). Strategic considerations for upcoming EU farmed animal legislation. Rethink Priorities. Available at:

<https://rethinkpriorities.org/publications/strategic-considerations-for-upcoming-eu-farmed-animal-legislation> (Accessed 27 September 2022).

EA Animal Welfare Fund (2021). July 2021: Animal Welfare Fund Grants. Available at:

<https://funds.effectivealtruism.org/funds/payouts/july-2021-animal-welfare-fund-grants#sentience-politics-125000> (Accessed 27 September 2022).

Eardley & McSorley (2022). Foie gras and fur: Tory MPs urge ministers not to drop import ban. BBC News. Available at:

<https://www.bbc.co.uk/news/uk-politics-60501617> (Accessed 27 September 2022).

eur-lex (2009). Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing (Text with EEA relevance). Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32009R1099> (Accessed 27 September 2022).

eur-lex (2011). FREE TRADE AGREEMENT between the European Union and its Member States, of the one part, and the Republic of Korea, of the other part. Available at:

[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22011A0514\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22011A0514(01)) (Accessed 27 September 2022).

eur-lex (2021). Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a carbon border adjustment mechanism.

Available at:

<https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:52021PC0564> (Accessed 27 September 2022).

Eurobarometer (2016). Attitudes of Europeans towards Animal Welfare. Available at: <https://europa.eu/eurobarometer/surveys/detail/2096> (Accessed 27 September 2022).

Eurogroup for Animals (2019). Could this be the moment for the EU to accelerate Ukraine's move towards better animal welfare?. Available at:

<https://www.eurogroupforanimals.org/news/could-be-moment-eu-accelerate-ukraines-move-towards-better-animal-welfare> (Accessed 27 September 2022).

Eurogroup for Animals (2020). EU Trade Policy Review is an opportunity for the EU to better address animal welfare in trade. Available at:

<https://www.eurogroupforanimals.org/news/eu-trade-policy-review-opportunity-eu-better-address-animal-welfare-trade> (Accessed 27 September 2022).

Eurogroup for Animals (n.d.a). Trade and Animal Welfare | Eurogroup for Animals. Available at:

<https://www.eurogroupforanimals.org/what-we-do/policy-areas/trade-and-animal-welfare> (Accessed 27 September 2022).

Eurogroup for Animals (n.d.b). Our Members | Eurogroup for Animals. Available at: <https://www.eurogroupforanimals.org/who-we-are/our-members> (Accessed 27 September 2022).

Eurogroup for Animals and Compassion in World Farming (2022). Bye bye cages! The legality of an EU ban on the sales of meat and eggs produced from caged animals including imported food. Available at:

<https://www.eurogroupforanimals.org/files/eurogroupforanimals/2022-03/2022-03-15%20-%20Bye%20bye%20cages%20report%20-%20English%20FINAL.pdf> (Accessed 27 September 2022).

EUROPEAN CETACEAN BYCATCH CAMPAIGN (n.d.). The Tuna Boycott Which Led To The "Dolphin Safe" Tuna Label. Available at:

<http://www.eurocbc.org/page322.html> (Accessed 27 September 2022).

European Commission (2002). EU trade relations with Chile. Available at:

[https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/chile\\_en#:~:text=The%20EU%20and%20Chile%20co](https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/chile_en#:~:text=The%20EU%20and%20Chile%20co)

- [ncluded,covering%20EU%2DChile%20trade%20relations.](#) (Accessed 27 September 2022).
- European Commission (2011). Access2Markets EU-South Korea Free Trade Agreement. Available at: <https://trade.ec.europa.eu/access-to-markets/en/content/eu-south-korea-free-trade-agreement> (Accessed 27 September 2022).
- European Commission (2017). EU-Ukraine Association Agreement fully enters into force. Available at: [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_17\\_3045](https://ec.europa.eu/commission/presscorner/detail/en/IP_17_3045) (Accessed 27 September 2022).
- European Commission (2018). REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL On the possibility of introducing certain requirements regarding the protection of fish at the time of killing. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0087&from=en> (Accessed 27 September 2022).
- European Commission (2020). EU and Mexico conclude negotiations for new trade agreement. Available at: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_756](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_756) (Accessed 27 September 2022).
- European Commission (2021). European Green Deal: Commission proposes transformation of EU economy and society to meet climate ambitions. Available at: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_3541](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_3541) (Accessed 27 September 2022).
- European Commission (2022). REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL Application of EU health and environmental standards to imported agricultural and agri-food products. Available at: <https://data.consilium.europa.eu/doc/document/ST-9651-2022-INIT/en/pdf> (Accessed 27 September 2022).
- European Commission (n.d.a). Health and Food Audits and Analysis. Available at: [https://food.ec.europa.eu/horizontal-topics/official-controls-and-enforcement/health-and-food-audits-and-analysis\\_en](https://food.ec.europa.eu/horizontal-topics/official-controls-and-enforcement/health-and-food-audits-and-analysis_en) (Accessed 27 September 2022).
- European Commission (n.d.b). Non-EU countries authorised establishments. Available at: [https://food.ec.europa.eu/safety/biological-safety/food-hygiene/non-eu-countries-authorized-establishments\\_en](https://food.ec.europa.eu/safety/biological-safety/food-hygiene/non-eu-countries-authorized-establishments_en) (Accessed 27 September 2022).
- European Council (2022a). Strengthening coherence between the Green Deal, the

CAP and trade policy to support the transition towards sustainable food systems  
– *Exchange of views*. Available at:

[https://data.consilium.europa.eu/doc/document/ST-5887-2022-INIT/en/pdf?utm\\_source=POLITICO.EU&utm\\_campaign=5b3e43ce24-EMAIL\\_CAMPAIGN\\_2022\\_02\\_20\\_05\\_29&utm\\_medium=email&utm\\_term=0\\_10959edeb5-5b3e43ce24-190664844](https://data.consilium.europa.eu/doc/document/ST-5887-2022-INIT/en/pdf?utm_source=POLITICO.EU&utm_campaign=5b3e43ce24-EMAIL_CAMPAIGN_2022_02_20_05_29&utm_medium=email&utm_term=0_10959edeb5-5b3e43ce24-190664844) (Accessed 27 September 2022).

European Council (2022b). The presidency of the Council of the EU. Available at:  
<https://www.consilium.europa.eu/en/council-eu/presidency-council-eu/>  
(Accessed 27 September 2022).

factory-farming.ch (2022). Initiative to abolish factory farming. Available at:  
<https://factory-farming.ch/> (Accessed 27 September 2022).

Farmers Weekly New Zealand (2021). NZ pig farmers back petition. Available at:  
<https://www.farmersweekly.co.nz/nz-pig-farmers-back-petition/> (Accessed 27 September 2022).

FAO Fisheries & Aquaculture (2019a). Global fish trade – By partner country  
Quantity (2019 – 2020). Available at:  
[https://www.fao.org/fishery/statistics-query/en/trade\\_partners/trade\\_partners\\_quantity](https://www.fao.org/fishery/statistics-query/en/trade_partners/trade_partners_quantity) (Accessed 27 September 2022).

FAO Fisheries & Aquaculture (2019b). Global fish trade – By partner country Value  
(2019 – 2020). Available at:  
[https://www.fao.org/fishery/statistics-query/en/trade\\_partners/trade\\_partners\\_value](https://www.fao.org/fishery/statistics-query/en/trade_partners/trade_partners_value) (Accessed 27 September 2022).

FAOSTAT (2020). Detailed trade matrix. Available at:  
<https://www.fao.org/faostat/en/#data/TM> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2010a). National Council Winter  
session 2010 Third Session 12/01/10 08h00 09.428. Available at:  
<https://www.parlament.ch/de/ratsbetrieb/amtliches-bulletin/amtliches-bulletin-die-verhandlungen?SubjectId=18337#votum1> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2010b). 10.4104 MOTION For a ban  
on imports of reptile skins from cruel production methods. Available at:  
<https://www.parlament.ch/en/ratsbetrieb/suche-curia-vista/geschaefte?AffairId=20104104> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2012). National Council Summer  
session 2012 First session 05/29/12 2:30 p.m 11.3635. Available at:  
<https://www.parlament.ch/de/ratsbetrieb/amtliches-bulletin/amtliches-bulletin-die-verhandlungen?SubjectId=25871> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2015a). National Council Spring

session 2015 Fifth Session 3/5/15 08h00 13.3331. Available at:

<https://www.parlament.ch/de/ratsbetrieb/amtliches-bulletin/amtliches-bulletin-in-die-verhandlungen?SubjectId=30455> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2015b). 15.3832 MOTION Prohibit the importation of products from animals that have been subjected to animal abuse. Available at:

<https://www.parlament.ch/en/ratsbetrieb/suche-curia-vista/geschaefte?AffairId=20153832> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2019a). 19.4425 MOTION Import ban on fur products produced with cruelty to animals. Available at:

<https://www.parlament.ch/de/ratsbetrieb/suche-curia-vista/geschaefte?AffairId=20194425> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2019b). 19.4583 MOTION Products from cruelty to animals. Equal treatment of domestic and foreign producers (taken over unchanged from Barbara Keller–Inhelder). Available at:

<https://www.parlament.ch/de/ratsbetrieb/suche-curia-vista/geschaefte?AffairId=20194583> (Accessed 27 September 2022).

The Federal Assembly – The Swiss Parliament (2022). National Council Spring session 2022 First session 02/28/22 2:30 p.m 20.3021. Available at:

<https://www.parlament.ch/de/ratsbetrieb/amtliches-bulletin/amtliches-bulletin-in-die-verhandlungen?SubjectId=55844> (Accessed 27 September 2022).

fishcount.org.uk (2016). Estimated numbers of individuals in average annual fish capture (FAO) by country fishing fleets (2007 – 2016). Available at:

<http://fishcount.org.uk/studydatascreens/2016/numbers-of-wild-fish-B0-2016.php?> (Accessed 27 September 2022).

fishcount.org.uk (2017). Estimated numbers of individuals in global aquaculture production (FAO) of fish species (2017). Available at:

<http://fishcount.org.uk/studydatascreens2/2017/numbers-of-farmed-fish-A0-2017.php?sort2/full> (Accessed 27 September 2022).

Focus Taiwan (2010). Environmentalists call for ban on seal products from Canada.

Available at: <https://focustaiwan.tw/news/201004130025> (Accessed 27 September 2022).

FOUR PAWS in Germany (n.d.). FUR INDUSTRY. Available at:

<https://www.vier-pfoten.de/kampagnen-themen/themen/mode-und-tierschutz/pelz-industrie> (Accessed 27 September 2022).

Fur Free Alliance (n.d.). OUR MEMBERS. Available at:

<https://www.furfreealliance.com/our-members/> (Accessed 27 September 2022).

- Gale and Arnade (2015). Effects of Rising Feed and Labor Costs on China's Chicken Price. Available at:  
<https://www.ifama.org/resources/Documents/v18ia/Gale-Arnade.pdf> (Accessed 14 October 2022).
- Ghislain and Vega (2021). Briefing : Chile | Animal Protection in EU Trade Negotiations. Eurogroup for Animals. Available at:  
[https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-11/2021\\_E4A-Chile-Report-ENG-FINAL.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-11/2021_E4A-Chile-Report-ENG-FINAL.pdf) (Accessed 27 September 2022).
- Giménez-Candela, Saraiva, and Bauer (2020). The legal protection of farmed fish in Europe – analysing the range of EU legislation and the impact of international animal welfare standards for the fishes in European aquaculture. Available at:  
[https://www.researchgate.net/publication/339634067\\_The\\_legal\\_protection\\_of\\_farmed\\_fish\\_in\\_Europe\\_-\\_analysing\\_the\\_range\\_of\\_EU\\_legislation\\_and\\_the\\_impact\\_of\\_international\\_animal\\_welfare\\_standards\\_for\\_the\\_fishes\\_in\\_European\\_aquaculture](https://www.researchgate.net/publication/339634067_The_legal_protection_of_farmed_fish_in_Europe_-_analysing_the_range_of_EU_legislation_and_the_impact_of_international_animal_welfare_standards_for_the_fishes_in_European_aquaculture) (Accessed 27 September 2022).
- Global Nonviolent Action Database (n.d.). United States consumers boycott tuna to protect dolphins, 1988-1990. Available at:  
<https://nvdatabase.swarthmore.edu/content/united-states-consumers-boycott-tuna-protect-dolphins-1988-1990> (Accessed 27 September 2022).
- Grethe (2007). High animal welfare standards in the EU and international trade – How to prevent potential 'low animal welfare havens'? Available at:  
<https://www.sciencedirect.com/science/article/abs/pii/S0306919206000807> (Accessed 27 September 2022).
- Hale (2021). New Zealand pig farmers demand imported pork measure up to NZ's animal welfare standards. Federated Farmers. Available at:  
<https://www.fedsnews.co.nz/new-zealand-pig-farmers-demand-imported-pork-measure-up-to-nzs-animal-welfare-standards/> (Accessed 27 September 2022).
- Hearthier (2019). The EU seal ban: Fine-tuning the Indigenous exemption. Available at:  
[https://jsis.washington.edu/news/the-eu-seal-ban-fine-tuning-the-indigenous-exemption/#:~:text=The%20EU%20ban%20was%20the,as%20Greenpeace%20\(Fakhri%202017\).](https://jsis.washington.edu/news/the-eu-seal-ban-fine-tuning-the-indigenous-exemption/#:~:text=The%20EU%20ban%20was%20the,as%20Greenpeace%20(Fakhri%202017).) (Accessed 27 September 2022).
- Humane Society International (2014). India Foie Gras Import Ban Applauded. Available at:  
<https://www.hsi.org/news-media/india-foie-gras-import-ban070714/> (Accessed 27 September 2022).
- Humane Society International (2018). Victory! India bans the import of seal fur and

skins. Available at:

<https://www.hsi.org/news-media/india-bans-seal-skins-import-040318/>  
(Accessed 27 September 2022).

Humane Society International (n.d.). Fur. Available at:

<https://www.hsi.org/issues/fur/> (Accessed 27 September 2022).

The Humane Society of the United States (2021). Ahead of G7 meeting, President Biden urged to support a permanent, global end to fur farming to avoid deadly future pandemics. Available at:

[https://www.humanesociety.org/news/ahead-g7-meeting-president-biden-urged-support-permanent-global-end-fur-farming-avoid-deadly?credit=blog\\_post\\_061721\\_id12337&\\_gl=1\\*\\_490pfi\\*\\_ga\\*MTk2NTE1OTY0MC4xNjUwOTgzMzk4\\*\\_ga\\_DGPX92WLR5\\*MTY1MDk4MzM5Ni4xLjEuMTY1MDk4NDgyOS40Nw.\\*\\_fplc\\*Vndkc09nY1dDb0pTd2VRUkVnZTBEMnYwME5hOjVxU1Z2bUlMbFdYQUtvcnc3JTICWHhwbWpZYU14TmxGWElaTmlJSnwpeXk1SU5MeE1zWiUyOllpQXZVOyUyRko1NoZHNHR1UjAlMkIwR2Rya0pwdjFsVlEwOXVXNCUyRmJsM3JGaiUyRjdwZUIjTNEJTNE](https://www.humanesociety.org/news/ahead-g7-meeting-president-biden-urged-support-permanent-global-end-fur-farming-avoid-deadly?credit=blog_post_061721_id12337&_gl=1*_490pfi*_ga*MTk2NTE1OTY0MC4xNjUwOTgzMzk4*_ga_DGPX92WLR5*MTY1MDk4MzM5Ni4xLjEuMTY1MDk4NDgyOS40Nw.*_fplc*Vndkc09nY1dDb0pTd2VRUkVnZTBEMnYwME5hOjVxU1Z2bUlMbFdYQUtvcnc3JTICWHhwbWpZYU14TmxGWElaTmlJSnwpeXk1SU5MeE1zWiUyOllpQXZVOyUyRko1NoZHNHR1UjAlMkIwR2Rya0pwdjFsVlEwOXVXNCUyRmJsM3JGaiUyRjdwZUIjTNEJTNE) (Accessed 27 September 2022).

Kerr (2019). Loopholes, Legal Interpretations and Game Playing: Whither the WTO without the Spirit of the GATT? Available at:

<https://law.usask.ca/documents/research/estey-journal/Kerr20-2lay.pdf>  
(Accessed 27 September 2022).

Kretzer (2013). Russia Bans Canadian Seal Fur. PETA. Available at:

<https://www.peta.org/blog/russia-bans-canadian-seal-fur/> (Accessed 27 September 2022).

Lastrucci (2022). Our Fight to Ban Foie Gras Worldwide. Animal Equality UK.

Available at:

<https://animalequality.org.uk/blog/2022/03/22/our-fight-to-ban-foie-gras-worldwide/> (Accessed 27 September 2022).

left.eu (2021). End the Cage Age: EU must ban caging of animals by 2027. Available at:

<https://left.eu/end-the-cage-age-eu-must-ban-caging-of-animals-by-2027/> (Accessed 27 September 2022).

Lin & O'Donnell (2013). First Asian Nation to Ban Seal Oil. Environment & Animal Society of Taiwan (EAST). Available at: <https://www.east.org.tw/en/8277>  
(Accessed 27 September 2022).

Lusk (2018). Consumer preferences for cage-free eggs and impacts of retailer pledges. Available at:

<https://onlinelibrary.wiley.com/doi/abs/10.1002/agr.21580> (Accessed 27 September 2022).

- Mann (1995). Mixed reaction to delay on ban of fur imports from 'jaw' traps. POLITICO. Available at: <https://www.politico.eu/article/mixed-reaction-to-delay-on-ban-of-fur-imp-orts-from-jaw-traps/> (Accessed 27 September 2022).
- Mantovani (2022). Swiss reject initiative to ban factory farming. REUTERS. Available at: [https://www.reuters.com/world/europe/swiss-course-reject-initiative-ban-factory-farming-2022-09-25/?fbclid=IwAR1e4-9kaPiznwVMVBmkvldphe\\_txtSglctEf89aLLBat\\_V7mWblePKXNgw](https://www.reuters.com/world/europe/swiss-course-reject-initiative-ban-factory-farming-2022-09-25/?fbclid=IwAR1e4-9kaPiznwVMVBmkvldphe_txtSglctEf89aLLBat_V7mWblePKXNgw) (Accessed 27 September 2022).
- Michaud (1997). Caught in a Trap: The European Union Leghold Trap Debate. Available at: <https://core.ac.uk/download/pdf/217210509.pdf> (Accessed 27 September 2022).
- Ministry for Primary Industries (2018). Amendment to the Animal Welfare (Care and Procedures) Regulations 2018 – Transport within New Zealand. Available at: <https://www.mpi.govt.nz/dmsdocument/1407-Transport-within-New-Zealand-Animal-Welfare-Code-of-Welfare> (Accessed 27 September 2022).
- Ministry for Primary Industries (2022). Code of Welfare for Pigs: Next steps, transitions and mitigations. Available at: <https://www.mpi.govt.nz/dmsdocument/52306-Code-of-Welfare-for-Pigs-Next-steps-transitions-and-mitigations> (Accessed 27 September 2022).
- Ministry for Primary Industries (n.d.). General importing requirements. Available at: [https://www.mpi.govt.nz/import/importing-into-nz-how-it-works/general-importing-requirements/#:~:text=All%20imports%20must%20be%20cleared,electronic%20cargo%20information%20\(ECI\).](https://www.mpi.govt.nz/import/importing-into-nz-how-it-works/general-importing-requirements/#:~:text=All%20imports%20must%20be%20cleared,electronic%20cargo%20information%20(ECI).) (Accessed 27 September 2022).
- Morrison (2021). Pork industry says 60,000 piglets could die if farrowing crates are banned. Stuff New Zealand. Available at: <https://www.stuff.co.nz/business/125618647/pork-industry-says-60000-piglets-could-die-if-farrowing-crates-are-banned> (Accessed 27 September 2022).
- Muehlhauser (2017). 2017 Report on Consciousness and Moral Patienthood. Open Philanthropy. Available at: <https://www.openphilanthropy.org/research/2017-report-on-consciousness-and-moral-patienthood/> (Accessed 27 September 2022).
- New Zealand Animal Law Association (n.d.). Welcome to the New Zealand Animal Law Association (NZALA). Available at: <https://nzala.org/w/> (Accessed 27 September 2022).
- New Zealand Government (2018). Code of Welfare – Commercial Slaughter. Available at: <https://www.mpi.govt.nz/dmsdocument/46018-Code-of-Welfare-Commercial>

[-slaughter](#) (Accessed 27 September 2022).

New Zealand Parliament (2022). Petition of Frances Clement: Apply equal animal welfare standards to imported and New Zealand farmed pork. Available at: [https://www.parliament.nz/en/pb/petitions/document/PET\\_111558/petition-of-frances-clement-apply-equal-animal-welfare](https://www.parliament.nz/en/pb/petitions/document/PET_111558/petition-of-frances-clement-apply-equal-animal-welfare) (Accessed 27 September 2022).

Open Philanthropy (2019). Eurogroup for Animals — European Union Trade Strategy. Available at: <https://www.openphilanthropy.org/grants/eurogroup-for-animals-european-union-trade-strategy/> (Accessed 27 September 2022).

Open Philanthropy (2022). Eurogroup for Animals — European Union Trade Strategy (2022). Available at: <https://www.openphilanthropy.org/grants/eurogroup-for-animals-european-union-trade-strategy-2022/> (Accessed 27 September 2022).

Our World in Data (2020a). Poultry meat per animal, 2020. Available at: <https://ourworldindata.org/grapher/poultry-yields-meat-per-animal> (Accessed 27 September 2022).

Our World in Data (2020b). Pig meat per animal, 2020. Available at: <https://ourworldindata.org/grapher/pig-yields-meat-per-animal-in-hectograms-100-grams> (Accessed 27 September 2022).

Our World in Data (2020c). Cattle meat per animal, 2020. Available at: <https://ourworldindata.org/grapher/cattle-meat-yields-hectograms-100-grams-per-animal> (Accessed 27 September 2022).

Our World in Data (2020d). Eggs per bird, 2020. Available at: <https://ourworldindata.org/grapher/egg-yield-per-bird> (Accessed 27 September 2022).

Our World in Data (2020e). Milk per animal, 2020. Available at: <https://ourworldindata.org/grapher/milk-yields-per-animal> (Accessed 27 September 2022).

Phillips (2015). 25th Anniversary of Dolphin Safe Tuna. International Marine Mammal Project. Available at: <https://savedolphins.eii.org/news/25th-anniversary-of-dolphin-safe-tuna> (Accessed 27 September 2022).

The Poultry Site (2007). Economic Approach to Broiler Production. Available at: <https://www.thepoultrysite.com/articles/economic-approach-to-broiler-production> (Accessed 14 October 2022).

Reich (2021). Israel bans sale of fur to fashion industry, first country to do so. The Jerusalem Post. Available at:

- <https://www.ipost.com/israel-news/israel-bans-the-fur-trade-to-fashion-industry-first-country-to-do-so-670538> (Accessed 27 September 2022).
- Rodriguez Ferrere, King, and Mros Larsen (2019). Animal Welfare in New Zealand Oversight, Compliance and Enforcement. Available at: [https://ourarchive.otago.ac.nz/bitstream/handle/10523/9276/Animal%20Welfare%20in%20New%20Zealand%20-%20Oversight,%20Compliance%20and%20Enforcement%20\(Final\).pdf?sequence=8](https://ourarchive.otago.ac.nz/bitstream/handle/10523/9276/Animal%20Welfare%20in%20New%20Zealand%20-%20Oversight,%20Compliance%20and%20Enforcement%20(Final).pdf?sequence=8) (Accessed 27 September 2022).
- RSPCA (n.d.). Protect the UK's farm animal welfare standards. Available at: <https://www.rspca.org.uk/getinvolved/campaign/faranimals> (Accessed 27 September 2022).
- Salz (1998). Sea Turtle Mortality, Shrimp Fisheries, and International Trade: A Case Study of a Global Natural Resource Conflict. Available at: <https://www.umass.edu/hd/research/turtle.pdf> (Accessed 27 September 2022).
- Schmidt, Duffield, Ferrere, and Knight (2021). Farmed animal welfare law in New Zealand: Investigating the gap between the animal welfare act 1999 and its delegated legislation. New Zealand Animal Law Association. Available at: [https://nzala.org/w/wp-content/uploads/2021/02/NZALA\\_Farmed\\_Animal\\_Report.pdf](https://nzala.org/w/wp-content/uploads/2021/02/NZALA_Farmed_Animal_Report.pdf) (Accessed 27 September 2022).
- Schukraft (2019). Opinion: estimating invertebrate sentience. Rethink Priorities. Available at: <https://rethinkpriorities.org/publications/opinion-estimating-invertebrate-sentience> (Accessed 27 September 2022).
- Springlea (2022). Imports to meet UK welfare standards. Animal Ask. Available at: [https://c2b5df1e-0ba2-4201-9fb6-87e92e6ad2c0.usrfiles.com/ugd/c2b5df\\_74a0dee19a8a40f4824ccd158476001d.pdf](https://c2b5df1e-0ba2-4201-9fb6-87e92e6ad2c0.usrfiles.com/ugd/c2b5df_74a0dee19a8a40f4824ccd158476001d.pdf) (Accessed 27 September 2022).
- swissinfo.ch (2015). 'Fair food' initiative to be put to the vote. Available at: [https://www.swissinfo.ch/eng/food-imports\\_fair-food-initiative-to-be-put-to-the-vote/41803136?utm\\_campaign=teaser-in-article&utm\\_source=swissinfoch&utm\\_medium=display&utm\\_content=0](https://www.swissinfo.ch/eng/food-imports_fair-food-initiative-to-be-put-to-the-vote/41803136?utm_campaign=teaser-in-article&utm_source=swissinfoch&utm_medium=display&utm_content=0) (Accessed 27 September 2022).
- Taunton (2021). Pig farmers in limbo over farrowing crates. Stuff New Zealand. Available at: <https://www.stuff.co.nz/business/farming/124430568/pig-farmers-in-limbo-over-farrowing-crates> (Accessed 27 September 2022).
- Trade and Animal Welfare Coalition (n.d.). TAWC Trade and Animal Welfare Coalition. Available at: <https://tawcuk.org/> (Accessed 27 September 2022).
- United Kingdom Parliament (2020). Agriculture Bill - COMMONS REASONS. Available at: <https://publications.parliament.uk/pa/bills/lbill/58-01/141/5801141.pdf>

- (Accessed 27 September 2022).
- web.archive.org (2019). United Kingdom | World Animal Protection. Available at: <https://web.archive.org/web/20191028180340/https://api.worldanimalprotection.org/country/united-kingdom> (Accessed 27 September 2022).
- Whitnall (2022). What laws protect farmed animals in the UK? The Humane League UK. Available at: <https://thehumaneleague.org.uk/article/what-laws-protect-farmed-animals-in-the-uk> (Accessed 27 September 2022).
- Wikipedia Contributors (2022). Foie gras controversy – Wikipedia. Available at: [https://en.wikipedia.org/wiki/Foie\\_gras\\_controversy](https://en.wikipedia.org/wiki/Foie_gras_controversy) (Accessed 27 September 2022).
- Williams et al. (2015). A snapshot of New Zealand farmers' awareness of, and self-reported compliance with, animal welfare requirements. Available at: <https://www.nzsap.org/system/files/proceedings/Williams%20et%20al.%20Animal%20welfare%20compliance.pdf> (Accessed 27 September 2022).
- World Animal Protection (2020a). Animal Protection Index. Available at: <https://api.worldanimalprotection.org/> (Accessed 27 September 2022).
- World Animal Protection (2020b). Animal Protection Index. Available at: <https://api.worldanimalprotection.org/methodology> (Accessed 27 September 2022).
- World Animal Protection (2020c). USA | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/usa> (Accessed 27 September 2022).
- World Animal Protection (2020d). Spain | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/spain> (Accessed 27 September 2022).
- World Animal Protection (2020e). Poland | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/poland> (Accessed 27 September 2022).
- World Animal Protection (2020f). Canada | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/canada> (Accessed 27 September 2022).
- World Animal Protection (2020g). Australia | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/australia> (Accessed 27 September 2022).
- World Animal Protection (2020h). New Zealand | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/new-zealand> (Accessed 27 September 2022).

- World Animal Protection (2020i). Thailand | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/thailand> (Accessed 27 September 2022).
- World Animal Protection (2020j). China | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/china> (Accessed 27 September 2022).
- World Animal Protection (2020k). France | World Animal Protection. Available at: <https://api.worldanimalprotection.org/country/france> (Accessed 27 September 2022).
- World Trade Organization (2001). DS58: United States — Import Prohibition of Certain Shrimp and Shrimp Products. Available at: [https://www.wto.org/english/tratop\\_e/dispu\\_e/cases\\_e/ds58\\_e.htm](https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds58_e.htm) (Accessed 27 September 2022).
- World Trade Organization (2012). Article XX General Exceptions. Available at: [https://www.wto.org/english/res\\_e/booksp\\_e/gatt\\_ai\\_e/art20\\_e.pdf](https://www.wto.org/english/res_e/booksp_e/gatt_ai_e/art20_e.pdf) (Accessed 27 September 2022).
- World Trade Organization (2013). DS285: United States — Measures Affecting the Cross-Border Supply of Gambling and Betting Services. Available at: [https://www.wto.org/english/tratop\\_e/dispu\\_e/cases\\_e/ds285\\_e.htm](https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds285_e.htm) (Accessed 27 September 2022).
- World Trade Organization (2014). DS400: European Communities — Measures Prohibiting the Importation and Marketing of Seal Products. Available at: [https://www.wto.org/english/tratop\\_e/dispu\\_e/cases\\_e/ds400\\_e.htm](https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds400_e.htm) (Accessed 27 September 2022).
- World Trade Organization (2017). DS381: United States — Measures Concerning the Importation, Marketing and Sale of Tuna and Tuna Products. Available at: [https://www.wto.org/english/tratop\\_e/dispu\\_e/cases\\_e/ds381\\_e.htm](https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds381_e.htm) (Accessed 27 September 2022).
- Zollickhofer (2021). Animal welfare: Pork NZ petition asks for equal standards. Waikato Herald. Available at: <https://www.nzherald.co.nz/waikato-news/news/animal-welfare-pork-nz-petition-asks-for-equal-standards/U4FD62YVIN5PYEABLBPOCUE2QM/> (Accessed 27 September 2022).