

16 January 2024

Written evidence on Trade Strategy submitted by Labour Animal Welfare Society

1. The [Labour Animal Welfare Society](#) (LAWS) welcomes the opportunity to respond to the Department for Business and Trade's consultation on trade strategy. LAWS is affiliated to the Labour Party as one of the official Socialist Societies and works to improve the lives of animals by promoting the cause of animal welfare across the Labour Party.

Executive Summary

2. Labour's landmark commitment to delivering the biggest boost to animal welfare in a generation can only be fully realised if the UK's trade strategy ensures imported products meet domestic welfare standards. Currently, products from farming practices banned in the UK for their cruelty continue to enter our market, effectively outsourcing animal suffering and undermining both British farmers and our welfare standards.
3. Secretary of State for Environment, Food and Rural Affairs Steve Reed MP made clear pre-election commitments to ensure products from practices like force-feeding cannot be sold in the UK¹. The trade strategy now provides the perfect mechanism to deliver on these commitments and extend this principled stance to cover all products from practices deemed too cruel to permit in Britain. This includes closing loopholes that currently allow imports from fur farming, battery cages for hens, sow stalls, and live lamb cutting.

Current Animal Welfare Inconsistencies

4. The gap between domestic standards and imports creates numerous contradictions that undermine Labour's animal welfare objectives:
 - o **Fur Farming:** Banned in Britain since 2000 due to inherent cruelty, yet the UK imported 710 tonnes of fur products in 2023². The global fur trade kills tens of millions of animals annually in conditions that would be illegal under UK law. Animals including foxes and mink are confined their entire lives in small, barren cages before being killed by gassing or anal electrocution - practices deemed morally unacceptable in Britain. Recent scientific research has also

¹<https://www.thegrocer.co.uk/news/labour-pledges-to-ban-foie-gras-imports-if-elected/692008.article>

² TRADE MAP. (n.d.). International Trade Centre. <https://www.trademap.org/>

identified 39 viruses classed as "potentially high-risk" for transmission to humans in fur farms, including 13 novel viruses³.

- **Foie Gras Production:** Force-feeding has been banned in the UK since 2007 as fundamentally incompatible with the Welfare of Farmed Animals Regulations, yet approximately 200 tonnes are imported annually. This trade supports the suffering of around 250,000 ducks and geese whose livers are painfully swollen to up to ten times their natural size through violent force-feeding⁴.
 - **Battery Cages:** The UK banned these cruel systems for egg-laying hens in 2012, yet faces increasing pressure through trade agreements to accept eggs from countries where they remain standard practice. The UK is currently negotiating a FTA with India where 80% of production uses battery cages with just 375cm² per bird - less than an A4 sheet of paper and half the minimum space required under UK law.
 - **Sow Stalls:** The UK banned the confinement of pregnant pigs in narrow cages where they cannot turn around in 1999, recognizing these systems as inherently cruel. However, almost all UK pork imports come from countries that still permit sow stalls for part of pregnancy⁵. These systems severely restrict natural behaviors, with sows unable to move freely or express normal social behaviors during confinement.
 - **Live Lamb Cutting:** This painful practice of removing skin from live lambs, often without pain relief, has been banned in the UK since 2010. However, it remains widespread in countries like Australia, where 44% of sheep undergo the procedure without anaesthesia and an additional 40% receive only basic pain relief. Furthermore, UK's FTAs with Australia and New Zealand remove all tariffs and quotas over 10-15 years allowing unrestricted access for products from these systems.
5. These contradictions not only cause immense animal suffering but create fundamental market distortions that disadvantage British farmers maintaining some higher welfare standards. The trade strategy presents a crucial opportunity to address these inconsistencies comprehensively.

³<https://www.cidrap.umn.edu/misc-emerging-topics/study-fur-farmed-animals-nets-125-viruses-including-novel-species-and-those>

⁴<https://www.rspcaassured.org.uk/farmed-animal-welfare/other-animal-welfare-concerns/what-is-foie-gras/#:~:text=These%20abnormally%20large%20livers%20can,of%20%C2%A325%20per%20100g.>

⁵ FAOSTAT. (n.d.). Food and Agriculture Organization of the United Nations. <https://www.fao.org/faostat/en/#data/TM>

Public Support for Labour's Position

6. There is overwhelming public support for ensuring imports meet UK standards:
 - 77% support ensuring imported fur meets domestic standards⁶
 - Recent YouGov polling showing nearly 90% of respondents favor ensuring imported foie gras meets UK welfare standards⁷
 - 84% of the British public support restricting or banning low-welfare imports that don't meet UK standards.⁸

This strong public mandate spans political affiliations and provides clear backing for Labour's ambitious animal welfare agenda.

Legal Framework

7. The legal pathway for ensuring imports meet UK welfare standards is well-established through multiple precedents and legal frameworks:
 - **WTO Compliance:** World Trade Organisation rules explicitly permit measures ensuring imports meet domestic standards when necessary to protect public morals under Article XX(a) of GATT. This includes measures protecting the public's belief in humane treatment of animals, as confirmed through multiple WTO cases.
 - **Existing UK Precedents:** The UK already has several important precedents for welfare-based import measures:
 - The EU Slaughter Regulation (retained in UK law) requires imported meat to be accompanied by certificates proving equivalent welfare standards
 - Recent legislation banning shark fin imports
 - Existing prohibitions on cat, dog, and seal fur imports
 - The ban on ivory imports
 - **International Examples:** Multiple jurisdictions have successfully implemented welfare-based import measures without WTO challenge:
 - India's ban on foie gras imports
 - California's Proposition 12 requiring imported pork to meet specific welfare standards
 - EU-wide restrictions on seal products
 - **Free Trade Agreement Compatibility:** The UK Trade and Agriculture Commission has examined multiple FTAs and determined that the UK "has the same rights as it would under WTO law to maintain and adopt protections" in the area of animal welfare. Independent legal advice confirms

⁶<https://www.hsi.org/news-resources/over-three-quarters-77-of-uk-voters-want-to-see-the-government-ban-fur-imports/>

⁷<https://www.thegrocer.co.uk/news/foie-gras-majority-of-brits-in-favour-of-import-ban-study-finds/694042.article>

⁸ Bryant Research. <https://bryantresearch.co.uk/insight-items/low-welfare-imports/>

that UK FTAs do not limit the ability to ensure imports meet domestic standards.

Recommendation

9. The Government's trade strategy must include legislation ensuring all animal products sold in the UK - whether produced in Britain or imported - meet British welfare standards. This requires:
 - Clear legislative framework for import standards
 - Specific provisions for currently banned practices including fur farming, force-feeding, battery cages, sow stalls, and live lamb cutting
10. This approach would fulfill Labour's commitment to transformative action on animal welfare while providing certainty for British farmers and meeting clear public expectations for consistent standards. The trade strategy presents a crucial opportunity to demonstrate that Labour's promises on animal welfare will be backed by concrete action to stop the outsourcing of cruelty through trade.

LABOUR ANIMAL WELFARE SOCIETY

30 Station Road, Nottingham NG4 3AX

www.labouranimalwelfaresociety.org.uk

Telephone: 0771 4435927

