

Comments on the Call for Evidence on the EU Livestock Strategy

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1. Overview and Executive Summary

The EU livestock strategy is part of the EU Vision for Agriculture and Food and an initiative in the European Commission's 2026 work programme, scheduled for publication in the second quarter of 2026. According to this initiative, livestock plays a crucial role in the economy, landscape preservation, biodiversity, and the food chain, yet the sector faces structural challenges such as declining herd sizes, farm closures, low profitability, competitive pressure, environmental and climate risks, animal health and welfare issues, and uneven territorial impacts.

The forthcoming EU Livestock Strategy sets the framework for shaping the European livestock sector, where embedding animal welfare must be a central, strategic objective. Scientific evidence, field investigations, and societal expectations consistently demonstrate the urgent need to reduce animal suffering across livestock production.

The Strategy must go beyond non-binding commitments and serve as a foundation for an ambitious animal welfare legislative review in 2026. This review should include the progressive phase-out of cages, the prohibition of male chick culling, the gradual elimination of force-feeding in foie gras production, and the establishment of harmonized welfare standards for imports. Without clear legislative follow-through, commitments risk remaining symbolic rather than producing tangible improvements.

Animal welfare should be fully integrated into EU livestock policy as a strategic asset, rather than a regulatory burden, ensuring that political commitments are translated into measurable, enforceable, and binding actions.

2. Animal Welfare as a central pillar of EU livestock policy and as a strategic asset

Animal welfare must not be treated as a secondary issue but as a central policy objective, embedded within the EU's comprehensive strategic approach. Doing so strengthens the internal coherence of EU public policies, in line with Article 13 of the TFEU and the One Health approach.

High animal welfare standards are a market differentiator, not a cost. The transition is economically viable and is already underway across Europe.

The EU livestock strategy already references animal welfare, recognizing its value as a factor of competitiveness and differentiation, as well as the importance of maintaining strict standards and a cross-cutting approach linking health and welfare. But, animal welfare must be tangibly

reflected in the strategy, promoting updates to existing legislation, alignment with scientific progress, research, and empirical evidence, as well as societal expectations.

This approach aligns with the Strategic Dialogue on the Future of EU Agriculture and the Commission's Vision for Agriculture and Food, which explicitly highlight animal welfare aspects. According to the EU Vision for Agriculture and Food, the Livestock Strategy should ensure that trade policies and access to external markets uphold EU animal welfare standards, requiring that imported animal products meet equivalent welfare criteria and reflect the expectations of EU citizens. This approach would advance the Vision's objective of a livestock sector that maintains high animal welfare standards in international trade while respecting the EU's core values.

3. The need for binding legislation

Non-legislative strategies alone cannot guarantee results. The EU livestock strategy must explicitly reference the upcoming 2026 legislative revision, as highlighted in the Strategic Dialogue and the Vision for Agriculture and Food, and be accompanied by concrete legislative measures, including a comprehensive review of animal welfare laws, clear compliance and enforcement mechanisms, and mandatory, harmonized standards. This would send a strong policy message and align with the Commission's declared commitment of updating EU animal welfare rules. Only by linking the strategy to the future binding legislation can commitments translate into real, measurable improvements on the ground.

Since the late 1980s and throughout the 1990s, the European Union began developing its regulatory framework on animal welfare, based primarily on species-specific directives: Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens, Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production, Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs and Council Directive 2008/119/EC of 18 December 2008 laying down minimum standards for the protection of calves; or practice-specific directives (Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes). Thus, the welfare of animals during on-farm rearing remains governed mainly by species-specific directives, whose national transposition has resulted in fragmented implementation and unequal levels of protection. Furthermore, the current legal framework is outdated, with many provisions in place for over 20 years.

All farmed animal species must be covered by specific animal welfare provisions, as each has particular physiological and behavioural needs that require a tailored regulatory approach. From a legal perspective, excluding certain species would be inconsistent with Article 13 of the Treaty on the Functioning of the European Union (TFEU), which recognises animals as sentient beings, and would undermine fundamental principles of EU law such as non-discrimination, legislative coherence, and legal certainty.

3.1. Phase-out of cages

The European Commission has committed to responding to the European Citizens' Initiative *End the Cage Age*. As part of this process, it aims to phase out cages by setting appropriate transition periods and establishing technical requirements for cage-free systems.

The proportion of farmed animals confined in cages differs greatly across Member States, and at present, no Member State is entirely cage-free.

Spain remains the country with the highest number of caged animals, totaling 86 million (65,158,811.4 -excluding calves, geese, quail, and broilers-).

A Europe-wide prohibition on cage farming is crucial to achieve consistent animal welfare standards across Member States and to avoid unfair market competition.

Currently EU legislation:

- Laying hens: European legislation on laying hens is regulated by Council Directive 1999/74/EC, which banned conventional battery cages from 2012 onwards, permitting the use of "enriched cages".
- Pigs: Minimum standards for keeping pigs are laid down in Council Directive 2008/120/EC. Pigs must be housed in groups, except for farrowing sows and boars. Since 2013, pregnant gilts and sows must be kept in groups from 28 days after insemination until one week before the expected farrowing. During the period from one week before farrowing until the piglets are weaned, the sow is housed in a farrowing crate.
- Rabbits: Regarding the rearing of rabbits in cages, the EU lacks specific and harmonized legislation at the community level. Currently, rabbit protection is governed by general animal welfare rules by general Directive 98/58/EC, but there is no specific regulation limiting or controlling the use of cages for rabbits. This legal gap has resulted in the majority of production rabbits in the EU continuing to be raised in cages.

Animal Equality operates in several countries within the European Union, including Germany, Italy and Spain, where it works to advance animal protection through investigations, public awareness campaigns, corporate engagement, and legal advocacy.

Germany has implemented national legislation on cage system:

- Enriched cages for laying hens: Enriched "colony cages" (Kleingruppenkäfige) must be phased out by 31 December 2025 (with narrowly defined hardship exemptions until 2028/29). No federal ban yet applies to sow stalls or rabbit cages, though long transitional periods are in place.
- Sow stalls and farrowing crates:

- The amendment to Germany's Ordinance on the Protection of Farm Animals (TierSchNutztV) establishes two separate transition deadlines: a) Deckzentrum (individual sow stalls) must be phased out by February 2029 (an eight-year transition period). b) Farrowing crates (Ferkelschutz-/farrowing pens) have a 15-year transition period that runs until 2036. then sows must not be kept in cages for more than 5 days around the time of birth.
- Cages for rabbits: Banned for meat rabbits. Additionally, specific welfare requirements apply, such as housing rabbits at least in pairs (for fattening rabbits), providing suitable gnawing materials, access to roughage, and access to a platform.

Italy and Spain currently have no prohibitions in force nor any commitments.

However, **Spain** has already expressed its legislative commitment to transitioning towards cage-free egg production systems through Royal Decree 1027/2024, of October 8, which regulates the application conditions of the European Union's egg marketing standards. The preamble of this Royal Decree explicitly acknowledges that the "Spanish sector is undergoing a process of conversion towards cage-free systems (...), and it is expected that the number of farms in which different rearing systems coexist will be very different in a few years". And the Spanish Government has acknowledged that the legislative process at the European level to ban cages is already underway. In response to two parliamentary questions (March and June 2025)^{1 2} It stated that once the legislation is presented, whether in the form of a regulation (directly applicable) or a directive (requiring national transposition), Spain will maintain open dialogue with stakeholders to ensure that the future legislation takes into account the realities of livestock farming in the country.

3.2. Ending the killing of male chicks

Each year, almost 330 million day-old male chicks are killed in hatcheries in the EU.³

Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing regulates the methods used to kill animals, including male chicks. Male chick culling typically takes place outside slaughterhouses, meaning that the presence of an animal welfare officer -as required under Article 17 of Regulation 1099/2009 in slaughterhouses- is not mandated in hatcheries. This regulatory gap hinders effective supervision and protection of these animals during the process, adding urgency to the need for legislative reform and harmonisation across the EU.

In its 2019 scientific opinion⁴ EFSA identified serious animal welfare concerns associated with the killing of male chicks and recommended the development and adoption of technologies that entirely prevent their hatching.

¹ https://www.congreso.es/entradap/115p/e6/e_0060523_n_000.pdf

² https://www.congreso.es/entradap/115p/e7/e_0070421_n_000.pdf

³ Vinci, C. (2022). *Male chick culling* [Analysis document]. European Parliament. [Male chick culling | Think Tank | European Parliament](#)

⁴ EFSA Panel on Animal Health and Welfare (AHAW), Killing for purposes other than slaughter: poultry, EFSA Journal, 2019; [Killing for purposes other than slaughter: poultry - - 2019 - EFSA Journal](#)

Animal Equality has been at the forefront of the campaign to end the culling of day-old male chicks, working both at the EU level and in several Member States to expose this hidden cruelty and advocate for legislative reform. Investigations have revealed the suffering caused by current culling methods, with footage used by the media, policymakers and citizens to raise awareness and demand change.

A comprehensive report details key alternatives to the culling of male chicks, with a particular focus on in-ovo sexing technologies⁵. These solutions allow the sex of the embryo to be determined during incubation, thereby preventing the hatching and subsequent culling of male chicks. According to estimates, global adoption of these technologies could save up to 7 billion chicks annually.

The Regulation (EC) No 1099/2009 allows Member States to adopt stricter national rules. Action at both EU and national level must go hand in hand to ensure coherent progress:

Germany: a national ban on male chick culling took effect on 1 January 2022.. Despite the progress made in Germany, several challenges persist that underline the need for EU-wide harmonisation. Moreover, an import loophole allows Germany to bring in hatching eggs and day-old pullets from EU countries where chick culling or sexing at or beyond day 12 is still legal, undermining both the intent of the national law and consumer transparency. In parallel, emerging research suggests that avian embryos may begin to feel pain before day 13. Germany's experience offers key lessons for effective EU-level reform. The transition away from male-chick culling has proven technically and economically feasible, with sexing technologies already in place and cost increases of less than 1–2 euro cents per egg. Retailers phased out culling from shell-egg lines within four years of sustained NGO pressure, before legal bans came into effect, demonstrating the power of coordinated advocacy.

Thanks to clear regulation and strong retail commitments, Germany's in-ovo sexing capacity ramped up rapidly. By 2025, German hatcheries were processing an estimated 5–10 million eggs per week with gender-identification technology. Respeggt, already responsible for more than one billion 'no-kill' eggs cumulatively, is now exporting its systems to hatcheries in the Netherlands, Norway and beyond; similar international roll-outs are planned for other providers. This momentum should be leveraged through a harmonised EU ban that incorporates effective enforcement mechanisms, prevents cross-border trade that undermines national bans, closes existing loopholes, and prioritises embryo welfare through science-based thresholds.

In **Italy**, a 2022 law prohibits this practice and establishes that, from 31 December 2026, the industry must be equipped with technology capable of determining the sex of the embryo prior to hatching. In November 2025, the Italian government issued official guidelines to end the systematic culling of newly hatched male chicks in the egg industry, with implementation scheduled to take effect from 1 January 2027.

⁵ Igualdad Animal (2025). Alternatives to avoid the culling of male chicks: in-ovo sexing technologies. [Un informe de Igualdad Animal - Alternativas para evitar el sacrificio de pollitos machos](#)

Following years of tireless campaigning and lobbying by Animal Equality, these guidelines require hatcheries to replace cruel methods such as maceration or gassing with in-ovo sexing techniques that determine the embryo's sex before hatching, thereby eliminating the need to kill one-day-old male chicks

In Spain, Animal Equality promoted a parliamentary question in April 2025 urging the Government to take a clear stance and advance legislation. In the Spanish Government's reply from June 2025, it is acknowledged that discussions with industry stakeholders are already underway on this issue. Building on this recognition, Animal Equality proposed the creation of a dedicated working group as a complementary initiative to the Commission's consultation, to facilitate structured dialogue between government, industry and civil society organisations aimed at advancing a fair and effective ban⁶. The Government reply also confirms that some Member States with existing bans have outsourced chick production to neighbouring countries where the practice is still allowed⁷. This highlights the need for all Member States to adopt robust legislation that prevents cross-border trade undermining national bans. Nonetheless, to ensure genuine impact and avoid fragmentation of the internal market, it is essential to advance towards harmonised EU legislation that guarantees a common approach and the effective elimination of this practice.

The upcoming EU legislation must establish a reasonable adaptation period to allow hatcheries to implement the required technologies and adjust their procedures accordingly, with realistic timelines and a clearly defined end date. It is also essential to fully reject any exemptions that could undermine the primary objective of the ban. In this regard, the Spanish Government's response to the parliamentary question already highlighted that exemptions allowed in other countries—such as the commercial use of male chicks or their bodies for animal feed could weaken the ban's impact and compromise its effectiveness.

3.3. Ban on Force-Feeding

Animal Equality has led an international campaign against force-feeding over the last decades, mobilizing significant public and political pressure through investigations, petitions and Public mobilization, legislative and political advocacy, protests and corporate and celebrity engagement.⁸

The current EU marketing standards for foie gras set minimum liver weights of 300g for ducks and 400g for geese and these can only be achieved through force-feeding. These provisions, originally introduced in earlier legislation (EEC No. 1538/1991 and EC No. 2390/1995), were adopted before animals were recognised as sentient beings under the EU Treaties. Currently, only five Member States (FR, HU, BG, ES, BE) allow force-feeding, while others have banned it entirely, creating regulatory asymmetry and raising concerns about internal market distortions. Spain has taken a significant step by formally debating the practice of force-feeding in its

⁶ Igualdad Animal. (2025). *We propose creating a working group to end the killing of male chicks* [News article]. [Proponemos crear mesa de trabajo sobre el fin de la matanza de pollitos](#)

⁷ https://www.congreso.es/entradap/115p/e7/e_0070753_n_000.pdf

⁸ Animal Equality. (2024-2025). *Changing the world for ducks and geese used for foie gras*. <https://animalequality.org/blog/changing-the-world-for-ducks-and-geese-used-for-foie-gras/>

Parliament, reflecting growing political attention to this issue⁹. Switzerland has introduced an obligation to inform consumers when foie gras is produced through force-feeding, explicitly indicating that animals are subjected to a painful procedure thereby sending a clear regulatory signal regarding the unacceptability of this practice¹⁰.

As discussed and acknowledged in the 2023 EC Impact Assessment Report on the revision of EU marketing standards for agricultural products SWD(2023) 97 final¹¹, a full ban on force-feeding would require action under animal welfare legislation. We believe this new legislative cycle offers a timely opportunity to resume that discussion and take meaningful steps towards a ban on force-feeding at EU level, in line with Directive 98/58/EC, that states: “No animal shall be provided with food or liquid in a manner, nor shall such food or liquid contain any substance, which may cause unnecessary suffering or injury”.

Force-feeding of ducks and geese for foie gras production has been scientifically documented to cause serious harm to the animals' health and welfare. These include significant physical distress, liver pathology, behavioural restriction, and elevated mortality rates. The European Commission's own *Scientific Committee on Animal Health and Animal Welfare* (SCAHAW)¹² concluded in its comprehensive 1998 report *The welfare aspects of the production of foie gras in ducks and geese* that “force feeding, as currently practised, is detrimental to the welfare of the birds” (Section 8.2). This conclusion was based on the review of multiple studies conducted in foie gras-producing countries and covered physiological indicators, liver pathology, and mortality rates.

Additionally, the Food and Agriculture Organization (FAO) stated clearly in 2002 that “the production of fatty liver for foie gras raises serious animal welfare concerns and is not a practice tolerated by the FAO.”¹³

⁹ [A Motion adopted by the Spanish Congress of Deputies](#)

¹⁰ [Swiss law entered into force](#)

¹¹ IMPACT ASSESSMENT REPORT Revision of EU marketing standards for agricultural products to ensure the uptake and supply of sustainable products (Brussels, 21.4.2023)
<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52023SC0097>

¹² Welfare Aspects of the Production of Foie Gras in Ducks and Geese' - Report of the Scientific Committee on Animal Health and Animal Welfare - Adopted 16 December 1998.

[Welfare Aspects of the Production of Foie Gras in Ducks and Geese Report of the Scientific Committee on Animal Health and Animal](#)

¹³ FAO (2002) Goose Production. FAO animal production and health paper 154. Chapter 11. FATTY LIVER OR FOIE GRAS PRODUCTION <https://www.fao.org/4/y4359e/y4359e00.htm>

4. Evidence shows structural failures in the current system

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Field investigations

Animal Equality operates in several countries within the European Union, including Germany, Italy and Spain, where it works to advance animal protection through investigations, public awareness campaigns, corporate engagement, and legal advocacy.

Animal Equality provides direct empirical evidence, including research, audiovisual material, and technical documentation, demonstrating that animal suffering in livestock farming is not isolated but systemic. Investigations in several Member States document and evidence systematic suffering caused by cage and confinement systems, as well as failures in the enforcement of existing regulations.

This evidence provides a solid and verifiable basis for demanding concrete reforms and ensuring that animal welfare is a priority. It complements the scientific literature and demonstrates a clear gap between legislation and practice.

Since 2008, Animal Equality has carried out undercover investigations in farms across Europe and beyond, documenting the systemic suffering caused by cage- and crate-based farming systems. The following case studies from Germany, Italy and Spain illustrate the harsh reality for animals in caged systems.

Germany

Pigs

The following is based on the expert statement of Tierärzte für verantwortbare Landwirtschaft (TFVL), which draws on undercover investigation material supplied by Animal Equality Germany, illustrating the severe, systemic animal suffering that persists in crate- and cage-based systems in Germany:

In brief camera pans one can see the size of the halls and the brutality of the concrete and metal structures. The so-called sow stalls or farrowing crates demonstrate the fundamentally contemptuous treatment of animals, which, used as breeding machines and raw-material suppliers and thus purely as production units, spend the greatest part of their lives immobilised

in metal cages barely larger than their own bodies. (...) In the supplied video sequences the animals are handled in a way that can hardly be imagined to be worse.

These are recognised displacement activities, because the animals fixed in the sow stall/farrowing crate cannot express their natural, innate, genetically determined urge to move, to care for their offspring, or the constant search for food that is normal in nature.

This type of husbandry clearly violates § 2 no. 2 of the Animal Welfare Act, according to which the possibility of species-appropriate movement may not be restricted in such a way that the animal suffers pain or avoidable suffering and harm. The species-appropriate drive for movement is restricted to such an extent here that one must speak of suffering. The animals see no other way out than to resort to senseless empty chewing or biting at the stall fittings. The sow-stall system is therefore clearly not compliant with the law.

From minute 36 onwards three sows are shown (animal nos. 3045, 38338, 37252) suffering from severe technopathies (diseases or bodily injuries caused by faults, defects or inappropriate design of technical equipment, e.g., sharp-edged gratings or metal bars). The injuries/inflammations shown here may arise because the dimensions of the sow stall are not matched to the size of the animal. Constant pressure or rubbing causes injuries which then become inflamed through lack of hygiene and treatment. (...). The wounds have raised margins, exude in places and are partly infested with flies. Touching the wounds elicits skin or muscle reactions, indicating pain. These animals must be taken to a hospital pen and be treated by a veterinarian. Most likely the stall fittings (sow stalls) are not large enough for the animals concerned, leading to the injuries. The stall size must be checked, as must the absence of dangerous defects or wear on the equipment. Because the injuries have existed for some time, this must also be seen as neglect of the duty to inspect (violation of the duty of daily control and inspection of the animals).”

Conclusion: These testimonies provide clear, documented evidence that sow crates, still allowed under lengthy transitional periods, cause profound physical injury, behavioural disorders and legal non-compliance. They exemplify the wider harms inherent to cage-based systems and underscore the urgent need for a harmonised EU-level ban on all cages.

Italy

Hens

An investigation¹⁴ in 2017 showed the standards within the egg industry and revealed the extreme conditions in which more than half of all egg-laying hens lived in the country. Hens are confined in tiny spaces suffering from serious diseases, feather loss and living among dead and decomposing animals as well as dead rats. Eggs infested with larvae and insects were also found.

¹⁴ Animal Equality Italy. (2017-2022). *Hens confined in filthy cages on Italian egg farms* [News article] <https://animalequality.org/news/2017/02/28/breaking-hens-confined-in-filthy-cages-on-italian-egg-farms/>

Hens spend their entire lives in tiny metal cages, deprived of sunlight and forced to stand on wire mesh floors, causing severe suffering. When their egg production declines, they are sent to slaughter. Animal Equality has taken legal action and reported the issue to environmental and health authorities, highlighting public health concerns. A year after the previous and first investigation of an Italian egg farm, investigators were sent back to document what changes had been made. Although we had reported our initial findings to the authorities, the new footage we obtained showed that conditions on the farm had worsened.

Pigs

In 2023, Animal Equality revisited a pig farm in Northern Italy to document whether conditions had improved after a 2019 investigation showed extreme abuse¹⁵. Routine findings in Italian pig farms include the confinement of mother pigs inside farrowing crates and cages that do not allow them to move, covered in sores, cysts and wounds on their bodies.

Rabbits

Animal Equality and LAV (Lega Anti Vivisezione) captured video footage¹⁶ inside some major Italian rabbit breeding facilities where rabbits were living in filth and were artificially inseminated over and over again. The footage shows the extreme conditions in which rabbits are raised on intensive farms in Italy, cages so small they cannot move or stretch, lack of hygiene, severe overcrowding, and suffering from untreated illnesses. The investigation also allowed the public to see the cruel ways in which the rabbits were transported and slaughtered.

Conclusion: Investigations into the welfare of hens, pigs, and rabbits in Italy have uncovered persistent and grave animal welfare violations. Egg-laying hens endure life-long confinement in cramped cages, deprived of natural light and normal behaviors, suffering from illness, feather loss, and exposure to decaying corpses. Despite legal complaints and warnings, conditions have not improved, with some farms showing deteriorated environments. Similarly, mother pigs remain trapped in restrictive farrowing crates, covered in sores and wounds, unable to move freely. Rabbits are housed in unsanitary, overcrowded cages so small they cannot stretch, enduring repeated forced inseminations and untreated diseases. These documented realities reveal a systemic disregard for animal well-being, underscoring the urgent necessity for comprehensive reforms to abolish such cruel confinement practices in all EU farming industries.

¹⁵ Animal Equality Italy. (2023). *Investigation: The face of Italian "excellence"* [News article]. <https://animalequality.org/news/2023/03/09/italy-excellence-pig-farm-investigation/>

¹⁶ Animal Equality Italy & LAV. (2015/ 2025). *Rabbit meat: shocking video investigation by Animal Equality and LAV* [Video investigation] [Carne di coniglio: video-investigazione choc di Animal Equality e LAV](#)
Animal Equality Italy. (2024). *The brief life of a farmed rabbit – Part One: "The Wait"* [Video]. YouTube. https://www.youtube.com/watch?v=pvt2_rabiTk

Spain

Hens

In February 2017, Animal Equality launched a campaign exposing the cruelty inside the egg industry in Spain. Video footage¹⁷ obtained showed hens confined in cages among decomposing bodies, birds with severe feather loss or mutilated beaks, and visibly ill animals left to die without veterinary care. The video also showed birds plucking feathers from one another and containers filled with dead and dying hens.

An investigation was released in July 2018 that reached millions of people through the media¹⁸. The publication of this investigation marked the beginning of a broader awareness campaign aimed at informing the public and driving meaningful change in the sourcing policies of producers and major food retailers.


Pigs

October 2023 footage¹⁹ also reveals persistent, extreme use of gestation crates for pregnant sows across multiple Spanish facilities. These crates are so narrow that the animals cannot turn around or move more than a single step, trapping them in severe physical restraint. Despite widespread public calls in Spain to ban cage-based confinement, these methods remain legal under transitional regulations. The undercover investigation shows that, far from being replaced, these crates continue to confine sows throughout most of their pregnancy, subjecting them to chronic immobilisation, stress, injuries, and suffering. This documentation underscores that legal confinement systems perpetuate systemic cruelty.

Rabbits

For over two years, Animal Equality investigators worked inside 70 rabbit meat industries in Spain, getting a first-hand look²⁰ at the abuse and cruelty that rabbits endure in the meat industry. This unprecedented documentation reveals never-before-seen footage exposing the severe abuse these animals suffer in farms that had not received sanitary or technical inspections for several years. The findings include rabbits with open wounds left untreated inside cages, without any veterinary care; cases of cannibalism among rabbits as a result of extreme overcrowding; dead rabbits left inside cages alongside live animals or rabbits being slammed violently to the ground.

¹⁷ Animal Equality Italy. (2024, March 15). *The brief life of a farmed rabbit – Part One: "The Wait"* [Video]. YouTube.

 Spanish hen farms exposed!

¹⁸ Igualdad Animal. (2018). *T5 News – Igualdad Animal denounces the abuse of caged hens* [Video]. Vimeo.. <https://vimeo.com/282400586?p=0s>

Martínez Varela, P. (2018). *41 million hens never leave their cages*. El País. https://elpais.com/politica/2018/07/29/actualidad/1532890405_694005.html

¹⁹ Igualdad Animal. (2023). *Spanish pig farms: injury, confinement, and death* [News]. <https://animalequality.org/news/2023/10/17/spanish-pig-farms-additional-cruelty-exposed/>

²⁰ Igualdad Animal. (n.d.). *Investigation on rabbit farms in Spain* [Web investigation]. <https://igualdadanimal.org/investigacion-en-granjas-de-conejos-de-espana/> and <https://vimeo.com/95700123?share=copy>

Conclusion: the investigations conducted into the egg, pig and rabbit industries provide clear, visual evidence that the continued legal use of cages results in severe animal suffering. Hens, sows and rabbits confined in these systems endure extreme physical and psychological distress, including untreated injuries, self-mutilation and death in overcrowded or restrictive environments. Despite overwhelming scientific evidence and growing public concern, keeping these animals in cages remains legal under outdated or transitional regulations, highlighting the urgent need for legislative reform to end this systemic cruelty.

Cage-Free Transition

The transition away from cages is feasible, rapid, and economically realistic. The EU Livestock Strategy must rely on real, verifiable evidence including data from civil society to accurately reflect conditions on the ground.

Transition periods should be limited, proportionate, and non-extendable. Excessively long timelines risk normalizing animal suffering that is already widely recognized as unacceptable, undermining the credibility of EU institutions. Concrete experiences across the EU and globally show that a meaningful transition can be achieved in the short term.

The following examples illustrate how the transition away from cages is already happening in practice, highlighting both the feasibility of cage-free systems and the importance of EU-level legislative support to ensure fair and effective implementation. According to the Open Wing Alliance²¹ Progress Report, 75% of the 440 cage-free commitments made by 274 companies in Europe are reporting progress.

Animal Equality Germany: Public sustainability reports show the following cage-free implementation rates for *shell* eggs: ALDI SÜD 95 % (2023)²², REWE Group 100 % (confirmed for Germany & Austria in 2025)²³, Kaufland ‘no cage eggs’ policy already in force²⁴, and Lidl on track for 100 % by end-2025²⁵. Since enriched cages remained legal nationally until 31 December 2025, these corporate results went beyond current statutory requirements and illustrate the market feasibility of higher-welfare systems ahead of legislation.

Animal Equality Italy has collaborated since 2017 with more than 30 major companies that successfully have adopted public and transparent commitments to stop using or selling eggs from caged hens. These companies include, among others, Pan Panorama, Esselunga, Carrefour, Galbusera, Balocco, and Paluani. Major producers such as Eurovo, Sabbatani, and Coccodì have taken a significant step by committing to a transition to cage-free systems. Eurovo converted its Italian farms in just two years and set a six-year timeline to achieve cage-free operations across the EU.²⁶

²¹ Open Wing Alliance. (n.d.). *Open Wing Alliance*. [Open Wing Alliance](#)

²² Animal welfare ALDI [Animal Welfare | ALDI SOUTH Group](#)

²³ The Humane League. (2025). *REWE Group publicly reports progress on its global cage-free egg commitment*. [REWE GROUP PUBLICLY REPORTS PROGRESS ON ITS GLOBAL CAGE-FREE EGG COMMITMENT](#)

²⁴ [Kaufland Leitlinie Tierwohl International](#) (download).

²⁵ Lidl [Lidl makes global own-label pledge on cage-free eggs - Just Food](#)

²⁶ Animal Equality Italy. (n.d.). *Aziende cage-free in Italia: quali mangiano uova da galline allevate a terra?* [Blog post]. [Quali aziende dicono basta alle gabbie per la produzione di uova?](#)

Several producers have successfully completed the transition within time frames ranging from two to six years. Major European food companies such as Barilla and pork producer Fumagalli are leading the transition to cage-free systems within their supply chains²⁷. 66% of egg production in Italy comes from cage-free systems, highlighting the significant progress made by companies leading the transition toward higher animal welfare standards.²⁸

Animal Equality Spain has been working with companies since 2017, helping them eliminate cages for laying hens and adopt fully cage-free policies. Some companies have already achieved 100% cage-free egg supply before 2025, demonstrating that the transition is indeed possible within a few years, especially when there is strong commitment and proper planning.

The 2024 *Informe de Transición a Sistemas Libres de Jaula*²⁹ found that 73% of the 158 committed companies in Spain reported progress, and 27% had already achieved full compliance before the 2025 deadline. These include a wide range of companies from food producers to retailers and hospitality chains, such as Barilla, Ferrero, Giovanni Rana, Dhul, Danone, Kraft Heinz, Lactalis, Unilever, GBFoods, Nomad Foods, Lindt, Mondelez, Vivescia, Vandemoortele, Carma, De Cecco, Gyma, Rians, Soreal, Hain Celestial, BRF, Dr. Oetker, Arla, Adam Foods, Ebro Foods, Rujamar, Four Seasons, Markas, Grupo IRCO, Motel One, Club Med, H World International, Mandarin Oriental, Comess Group de Restauración, El Corte Inglés, Restaurante Lateral, Udon Asian Food, Alsea Europe, IKEA, Subway, AmRest, KFC, Vapiano, Buffalo Grill, Starbucks Coffee (Alsea), Marks & Spencer, Lidl, Ahorramás, Sánchez Romero, SuperSol, Condis, Masymas Supermercados (Juan Fornés Fornés), Froiz, Ametller Origen, Amazon, and Transgourmet Ibérica (GM Cash, Suma, Proxim, Spar).

Some, like Lidl and Rujamar, reached 100% cage-free egg supply even before 2025. Lidl publicly reported increased sales after switching exclusively to cage-free eggs. RIU Hotels & Resorts completed the transition in just one year. The 2024 *Informe del huevo* (Alimarket) confirms that producers and supermarkets are leading the transition.

By 2024, companies working with Animal Equality had reached an average implementation rate of 75%. Huevos Guillén, for example, is expected to reach 75% cage-free by 2025 and could complete the transition by 2027. This indicates that new companies may need a 3 to 6 year timeframe to complete their transition, as outlined in the Eurogroup report.³⁰ The Eurogroup for Animals. (2023) report *Phasing out cages in the EU: The road to a smooth transition*, presents case studies that show how companies have transitioned to cage-free systems, including the time frames involved (4-6 years for hens, for sows 3-5 years and for rabbits 3-5 years).

²⁷ CIW. 2024. Le aziende alimentari preparano il terreno per un'Europa senza gabbie. [Le aziende alimentari preparano il terreno per un'Europa senza gabbie](#)

²⁸ Compassion in World Farming. (n.d.). *EggTrack – Better welfare for egg laying hens*. <https://www.eggtrack.com/it/>

²⁹ Corporate Transition to Cage-Free Systems in Spain – Report 2024 [TRANSICIÓN DE EMPRESAS A SISTEMAS LIBRES DE JAULA EN ESPAÑA](#)

³⁰ Eurogroup for Animals. (2023). *Phasing out cages in the EU: A road to a smooth transition*. [Phasing out cages in the EU: the road to a smooth transition | Eurogroup for Animals](#)

According to the Spanish Ministry of Agriculture, Fisheries and Food, the number of caged hens in Spain dropped by 2 million in one year, with the share decreasing from 67% to 64%³¹. This shift is driven by corporate commitments and increased consumer awareness. These data show that the trend towards the end of cages is unstoppable. In 2017, when Animal Equality Spain began its advocacy work with companies, the percentage of caged hens was 93%.

The Spanish Government has incorporated cage-free requirements into public procurement, following proposals by Igualdad Animal. The new *Catálogo de Prescripciones Técnicas Ecológicas (PTE)*³² establishes minimum animal welfare criteria for the acquisition of eggs across the General State Administration, its autonomous agencies, and public sector entities. Purchases of eggs from caged hens are now prohibited. These criteria apply to all food procurement in public institutions, from cafeterias and events to canteens and catering services, and become mandatory when included in tender specifications.

Taken together, these examples provide evidence that the transition to cage-free systems is not only realistic and achievable, but already underway. Some companies have already accomplished it in less than five years. For those still in transition, two to three more years would be enough in most cases. With strong political will and clear legislation, the remaining companies could complete their transitions within a few years, making long or indefinite timelines unnecessary.

5. Reciprocity in imports

The EU Livestock Strategy must explicitly address the issue of imported animal products, ensuring that trade policy reinforces, rather than undermines, the strategy's objectives. Future EU legislation should require that all imports of animals and animal-derived products comply with standards equivalent to those applied within the EU. Without this, the strategy risks losing credibility, and Article 13 TFEU which obliges the Union to fully consider animal welfare when formulating and implementing policies, would be undermined.

Ensuring equivalence in imports also protects EU producers. Allowing competition from products obtained through banned methods while imposing stricter requirements domestically creates unfair competition and jeopardizes the conditions necessary for a just transition towards higher animal welfare. Moreover, permitting imports that do not meet EU standards shifts cruelty beyond the Union's borders, contradicting the principle of policy coherence enshrined in Articles 7 and 21 of the TFEU, which govern internal and external EU actions and relations.

International legal precedent supports this approach. Article XX of the General Agreement on Tariffs and Trade (GATT) permits trade restrictions on grounds of public morality or animal protection.

³¹ Igualdad Animal. (2025). *The number of hens kept in cages has decreased by 2 million*. [El número de gallinas enjauladas se reduce en 2 millones | Igualdad Animal](#)

³² [Catálogo de Prescripciones Técnicas Ecológicas](#)

The WTO Appellate Body confirmed this in cases DS400 and DS401, recognizing that animal welfare constitutes a legitimate objective under Article XX(a) of GATT. This legal foundation validates the EU's ability to restrict imports for animal welfare reasons and to establish market access conditions accordingly.

Recent regulatory developments demonstrate the feasibility and coherence of such requirements. For example, Regulation (EU) 2023/1115 on deforestation-free products and Regulation (EU) 2023/956 establishing the Carbon Border Adjustment Mechanism require imports to meet environmental and human rights standards equivalent to EU norms. Similarly, the Livestock Strategy should embed mandatory equivalence for animal welfare, using mechanisms such as mirror clauses and import conditions, to ensure that imported products align with EU standards.

Public support for this approach is strong: the 2023 Eurobarometer reports that 84% of Europeans believe EU animal welfare standards should apply to imported products³³. Applying these standards globally represents an opportunity to raise animal protection worldwide, ensuring ethical consistency, fair competition, and alignment with citizens' expectations. Therefore, the requirement for equivalence should fully apply to animal farming methods, reflecting the EU's minimum animal welfare standards. Implementation should be progressive but binding, relying on mechanisms such as mirror clauses and import-related conditions embedded in EU legislation.

Empirical evidence from trading partners highlights the urgency of this measure. Investigations by Animal Equality in Mexico, the United States, Brazil, India, and the UK show widespread use of cages, poor veterinary care, and intensive confinement systems in production intended for export to the EU. Data from the European Commission confirms that imports from these countries already include eggs, dairy, and other animal products from intensive production systems, with potential for expansion if equivalence is not enforced. Integrating these requirements into the Livestock Strategy ensures that progress achieved within the EU is not undermined by imports produced under lower welfare standards, reinforcing the strategic and ethical goals of the strategy.

Mexico

In Mexico, the use of cages remains legal and widely practiced, with no specific regulation prohibiting intensive confinement.³⁴ Investigations by Animal Equality Mexico have documented extreme overcrowding, deprivation of natural behaviours, and veterinary neglect in these systems³⁵. Although the majority of caged animal products are consumed locally, there is export potential to the EU. According to European Commission data, while current imports of Mexican animal products represent less than 5% of total agri-food imports, entries of products such as eggs, dairy derivatives, and "other animal products" have been recorded.³⁶ This indicates that certain categories linked to cage confinement, such as egg albumin or processed ingredients,

³³ European Commission, *EU citizens want stronger animal welfare rules, says new survey*, Press Release IP/23/4951, March 28, 2023, [European Green Deal: Commission proposes transformation of EU economy and society to meet climate ambitions](#)

³⁴ Animal Equality Mexico. Is it legal to keep animals in cages? [¿Es legal mantener animales en jaulas?](#)

³⁵ Animal Equality Mexico. Life in a cage. [La Vida en una Jaula](#)

³⁶ European Commission. Agri-food trade factsheet – Mexico. [Americas - Agriculture and rural development - European Commission](#)

are already entering the European market and could expand over time if appropriate trade and sanitary conditions are established.

United States

In the U.S., the use of cages, especially for gestating sows and laying hens, remains legal and widespread.³⁷ Investigations by Animal Equality have documented severe confinement conditions, physical injuries, mutilations without anesthesia, and lack of veterinary care on pig, poultry, and dairy farms³⁸. The U.S. maintains a volume of animal product exports to the EU, with European imports increasing between 2020 and 2024.³⁹ Notable growth has been seen in dairy products, poultry, and eggs. This confirms the presence in the European market of products originating from caged and intensive production systems.

Brazil

In Brazil, the use of cages for laying hens and sows remains common, with conditions of overcrowding, injuries, and poor hygiene documented by Animal Equality Brazil, alongside irregularities in cattle slaughter.⁴⁰ According to European Commission data from 2020-2024, European agri-food imports from Brazil have remained stable, with animal products accounting for approximately 7.5% of the total, especially beef, poultry, and eggs.⁴¹ This confirms the presence in the European market of products from caged and intensive production systems.

Animal Equality Brazil has raised concerns regarding the impact that the EU-Mercosur trade agreement could have on animal welfare, in a report highlighting the lack of animal protection legislation in Mercosur countries and warning about the expansion of intensive confinement systems such as gestation crates for sows, battery cages for hens, and chick culling.⁴²

India

In India, the use of cages for laying hens remains legal and common, with battery cage systems housing up to eight birds per cage under overcrowded conditions and poor health care.⁴³ Investigations by Animal Equality India have also documented serious irregularities and mistreatment in dairy production.⁴⁴ According to European Commission data, although India maintains a very limited presence in the European market for eggs and dairy products, there is an entry of derivatives such as processed ingredients, suggesting potential for expansion under certain trade frameworks.⁴⁵

³⁷ Animal Equality. Gestating sows in crates. <https://animalequality.org/campaign/us-pig-breeding-farm-investigation/>

³⁸ Animal Equality. Calf cruelty. <https://animalequality.org/news/2019/07/18/animal-equality-investigation-reveals-shocking-scenes-of-neglect-at-us-calf-ranch/>

³⁹ European Commission. Agri-food trade factsheet – USA. [Americas - Agriculture and rural development - European Commission](#)

⁴⁰ Animal Equality Brazil. Caged hens. Available at: <https://animalequality.org.br/campanha/galinhas-em-gaiolas/>

⁴¹ European Commission. Agri-food trade fact sheet – Brazil. [Americas - Agriculture and rural development - European Commission](#)

⁴² Animal Equality Brazil & Eurogroup for Animals. Consequences of the draft EU-Mercosur free trade agreement on animal agriculture. 2025. [CONSEQUENCES OF THE DRAFT EU-MERCOSUR FREE TRADE AGREEMENT ON ANIMAL AGRICULTURE](#)

⁴³ Animal Equality India. Caged laying hens. [Illegal and cruel battery cages in egg farms | Animal Equality India](#)

⁴⁴ Animal Equality India. Dairy industry. <https://animalequality.in/campaign/india-deadly-dairy/>

⁴⁵ European Commission. Agri-food trade factsheet – India. [Asia and Australasia - Agriculture and rural development](#)

United Kingdom

Across the UK are trapped in cages on factory farms: 200,000 mother pigs in farrowing crates every year, 8 million hens in cramped cages and social calves are isolated in solitary pens. Animal Equality UK released in June 2025 June a report⁴⁶ highlighting severe animal welfare concerns associated with the use of farrowing crates in the UK pig industry. This analysis of footage collected from a farm in Devon showed that pregnant sows in farrowing crates spent more than 90% of their time lying down, with one not standing up at all for a day. On average, between them they bit the bars (a sign of extreme stress) more than once an hour.⁴⁷

According to DEFRA, the UK exports animal products to the EU, including eggs, as well as milk, dairy, poultry, and pork. Animal Equality UK's "Help Hens" campaign aims to eliminate the use of cages in the UK egg industry, based on undercover footage from a Red Tractor-certified farm in Devon⁴⁸. On 16 June 2025, UK Parliament debated a public petition to end the use of cages and crates for all farmed animals (34% of farmed animals still kept in caged systems). Among others, the Government response took into consideration the fact that when considering changes to welfare standards at home, it is crucial that we consider the potential for simply moving low-welfare production overseas: replacing a UK egg with an imported caged egg would be bad for the consumer, bad for producers, and bad for animal welfare⁴⁹.

6. Securing commitments

The European Commission has made clear commitments, including through the Farm to Fork Strategy (2020)⁵⁰ and the "End the Cage Age" citizens' initiative (2021)⁵¹. The review process launched under the Farm to Fork Strategy, combining a fitness check, public consultation, and input from the End the Cage Age initiative, ultimately confirmed the need to revise and modernise EU animal welfare legislation (2022):⁵²

"The current EU animal welfare legislation needs to be updated to reflect societal expectations and ethical concerns, scientific and technological evidence, developments and future sustainability challenges. Citizens' concerns for animal welfare extend beyond animals used for food production.

The current EU animal welfare legislation was an appropriate response to the animal welfare needs and challenges at the time of its adoption, based on the best available science of that time. Despite the progress made, the problems and drivers remain

⁴⁶ Animal Equality UK, *Captive in Cages: The Silent Struggle of Mother Pigs*, June 13, 2025, <https://animalequality.org.uk/news/2025/06/13/experts-warn-of-pigs-suffering-from-ptsd-misery-and-apathy-in-report-calling-for-ban-on-cages/>.

⁴⁷ Damian Carrington. "Calls to ban restrictive pens for pregnant pigs after analysis of footage from Devon farm," *The Guardian*, June 13, 2025 [Devon farm footage prompts calls to ban restrictive pens for pregnant pigs | Animal welfare | The Guardian](https://www.theguardian.com/animals/2025/jun/13/devon-farm-footage-pregnant-pigs).

⁴⁸ Animal Equality UK. (s. f.). *Help hens Cruel Cages: Hens suffering on British egg farm* | Animal Equality UK

⁴⁹ UK Government and Parliament. (2025). *End the use of cages and crates for all farmed animals*. Petition Parliament. [End the use of cages and crates for all farmed animals - Petitions](https://www.parliament.uk/petitions/2025/end-the-use-of-cages-and-crates-for-all-farmed-animals)

⁵⁰ [Communication: A Farm to Fork Strategy](https://ec.europa.eu/commission/presscorner/detail/en/ip_2020_0437)

⁵¹ [Register of Commission Documents - C\(2021\)4747](https://ec.europa.eu/commission/presscorner/detail/en/ip_2021_4747)

⁵² [FITNESS CHECK of the EU Animal Welfare legislation](https://ec.europa.eu/commission/presscorner/detail/en/ip_2022_1117)

relevant today, as increasing societal expectations (including ethical concerns, including regarding the use of cages), scientific and technological developments and future sustainability challenges are not properly addressed by current rules”.

Subsequently, the Commission’s commitment was reiterated in the Vision for Agriculture and Food (2025)⁵³, built on the Strategic Dialogue on the Future of EU Agriculture. In line with this latest framework, the Commission plans to propose further revision to existing EU animal welfare legislation, including the phasing out of cages. The Commission will also pursue, in line with international rules, a stronger alignment of animal-welfare standards applied to imported animals and food. This revision will be based on the latest scientific evidence and consider the socio-economic impact on farmers and the agri-food chain.

The livestock strategy must preserve and reinforce these historic commitments, ensuring they are not diluted within a non-binding framework, but instead translated into concrete, time-bound legislative action that delivers a comprehensive revision of EU animal welfare rules, in line with citizens’ expectations and scientific evidence.

7. Aligning the CAP with the targets of the EU Livestock Strategy

While unconditional subsidies should not be encouraged, the transition process requires sufficient financial support. Moreover, the reform of the Common Agricultural Policy represents a strategic opportunity to contribute to achieving the objectives of the EU Livestock Strategy while also facilitating the shift towards higher levels of animal welfare.

The 2025 Eurobarometer on Europeans, agriculture, and the CAP reveals that 88% of respondents consider it important that food products are produced under high environmental and animal welfare standards when making purchasing decisions⁵⁴. The importance of the CAP in promoting high animal welfare is underscored by a recent consumer survey, which found that 81% of Europeans expect the CAP to help enhance animal welfare, highlighting it as one of their main concerns.⁵⁵

Beyond the CAP, other financial mechanisms, such as the Competitiveness Fund, the Transition Fund, EU promotion policy, sector-specific innovation programmes, can support the adoption of cage-free systems and in-ovo sexing technologies, both widely endorsed in the consultation on the EU animal welfare legislation review.

⁵³ [A Vision for Agriculture and Food Shaping together an attractive farming and agri-food sector for future generations](#)

⁵⁴ European Commission. (2025). *Special Eurobarometer 522: Attitudes of Europeans towards Animal Welfare*. Eurobarometer. <https://europa.eu/eurobarometer/surveys/detail/3226> See Reports and documents. European Commission. 2025. [Europeans, agriculture and the CAP](#).

⁵⁵ BEUC. 2025. [The Common Agricultural Policy \(CAP\): What consumers want. A survey of consumers’ understanding and expectations](#).

8. Conclusion and demands

- **Incorporate animal welfare as a central and binding objective of the Strategy:**

The Strategy must explicitly recognize animal welfare as a strategic pillar, not a secondary issue. It should establish clear commitments to guide the 2026 legislative review, including the phase-out of cages, the end of male chick culling, and the gradual elimination of force-feeding in foie gras production, ensuring that the Strategy's objectives are translated into verifiable legislative actions.

- **Ensure equivalence of standards for imports within the framework of the Strategy:**

The Strategy should include a clear policy guaranteeing that all imported animal products meet standards equivalent to those of the EU, preventing unfair competition and welfare leakage outside European territory. This would reinforce the Strategy's coherence with international commitments and align with European citizens' expectations for ethical and responsible products.

- **Define support and transition mechanisms linked to the Strategy:**

The Strategy should provide technical support and monitoring tools, such as transition mechanisms for the adoption of cage-free systems and in-ovo sexing technologies, along with clear, time-bound, and non-extendable transition periods. These mechanisms must ensure that strategic objectives are converted into tangible results, preventing the Strategy from remaining limited to voluntary commitments or statements of intent.