

**EUROGROUP
FOR ANIMALS**



NO DOUBLE STANDARDS

**CLOSING THE ANIMAL WELFARE GAP
FOR IMPORTED CHICKEN MEAT**



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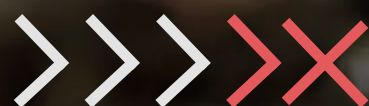
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EXECUTIVE SUMMARY

The European Union is preparing to modernise its animal welfare legislation, including the rules applying to chickens kept for meat production.

This is an important step forward because current EU rules do not adequately address major welfare risks, including those associated with fast-growing breeds, high stocking densities and poor environmental conditions. However, those improvements must not stop at the EU border. The EU Livestock Strategy sets out the Commission's intention to develop measures on equivalent import requirements, creating an important opportunity to ensure that future EU welfare reform also applies meaningfully to imports.

There is strong public support for extending EU animal-welfare protection to imported food. In the 2023 Special Eurobarometer on animal welfare, 84% believed that the current animal welfare situation (where imports are not required to comply with all EU welfare rules) should change, either by imposing import requirements or a very strict labelling system. Similarly, a poll by BEUC, the European Consumer Organisation, found that 78% agreed that imported animal products should be subject to the same welfare standards as those produced in the EU.

In 2025, imports from the United Kingdom (UK), Ukraine, Brazil and Thailand accounted for 88% of the raw and processed chicken products imported into the EU. These imports were estimated to derive from around 274 million chickens raised for meat. According to AVEC, the Association of Poultry Processors and Poultry Trade in the EU, around 25% of poultry breast meat consumed in the EU comes from third countries. Evidence from these exporting countries shows that many of the welfare risks the European Food Safety Authority (EFSA) has highlighted as priorities for improving meat chicken welfare in the EU are also present in key import supply chains.

Current EU import controls provide important safeguards for food safety and animal health and require equivalent protection at slaughter. However, they do not require equivalent welfare protection during breeding, rearing and transport, leaving core welfare concerns unaddressed.

This regulatory gap has implications not only for animal welfare but also for fair competition. If EU producers are required to invest in higher-welfare production while imported products remain subject to weaker or less verifiable requirements, third-country exporters may gain a competitive advantage in the EU market.

Public finance may contribute to this imbalance. In some exporting countries, it has supported the expansion and consolidation of large poultry companies, helping intensive production systems scale to extremely high volumes and potentially strengthening their ability to compete on price.

Survey evidence suggests many consumers expect all chicken products placed on the EU market to provide a level of welfare protection equivalent to that required for EU production. In practice, however, they often have limited visibility over where imported chicken is produced or the standards applied, particularly in food-service, processing, and prepared-food channels. This weakens the market signal for higher-welfare production. Labelling can improve transparency, but it cannot provide a legal welfare baseline or shift responsibility for minimum standards onto consumers.

Trade agreements alone are also insufficient. Even where animal welfare conditions are linked to tariff preferences, they do not necessarily prevent products produced to weaker standards from entering the EU market.

Equivalent import requirements therefore offer a practical and legally feasible way to ensure that modernised welfare protection applies to all chicken meat placed on the EU market, regardless of origin. The EU already applies production-related requirements to some imported animal products, including conditions relating to slaughter and antimicrobial use, and World Trade Organization law does not preclude appropriately designed animal-welfare import measures.

The key is therefore not whether the EU can act, but whether it adopts clear and meaningful requirements that address the major welfare risks in meat chicken production. A narrow focus on cages would not achieve this or prevent products produced to weaker welfare standards from entering the EU market.

EUROGROUP FOR ANIMALS AND WORLD ANIMAL PROTECTION THEREFORE RECOMMEND THAT THE EU SHOULD:

- Include effective and meaningful import requirements¹ in modernised EU meat chicken welfare legislation, benchmarked against the standards set by that legislation.
- Apply them across the full production chain and to all chicken products placed on the EU market, including fresh, frozen, prepared, preserved and processed products, regardless of whether they are sold through retail, food service or other channels.
- Require equivalent welfare protection, without requiring identical legislation, and make market access dependent on demonstrating and maintaining that equivalence through approval, certification, traceability, audits, corrective action and suspension powers.
- Ensure trade agreements support, rather than dilute, equivalent welfare protection, by using cooperation mechanisms to facilitate implementation.
- Provide transition periods, guidance and technical support for importing countries without creating permanent loopholes.

Modernised EU welfare legislation, matched by meaningful import requirements, will help protect the integrity of EU animal welfare reform, create fairer competition for EU producers and strengthen consumer trust. Together, these measures will turn the Commission's stated intention into substantive welfare protection throughout the meat chicken production cycle, while ensuring that EU reform applies consistently to domestically produced and imported chicken products.



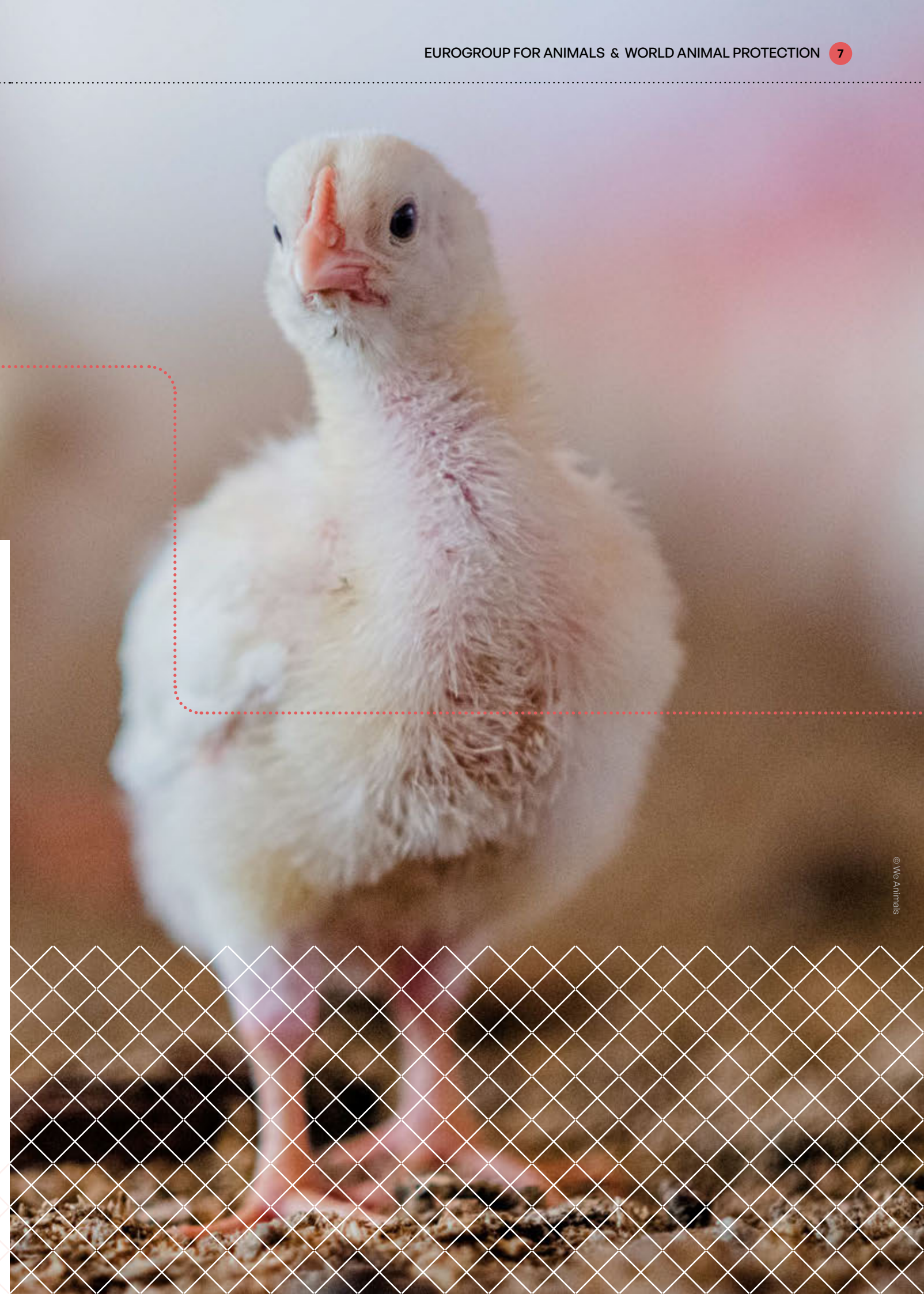
INTRODUCTION

The EU is preparing to modernise its animal welfare legislation, including the rules applying to chickens kept for meat production. This raises the question of how those improved standards will apply to imports. The European Commission's Livestock Strategy says that a targeted revision of the meat chicken rules should be proposed by the end of 2026, including “equivalent import requirements”. This is an important opportunity to ensure that stronger EU welfare standards are matched by meaningful requirements for products entering the EU market, rather than focusing too narrowly on a single issue, such as cages in chicken meat production.

This report builds on Eurogroup for Animals' 2025 & 2026 reports, *Stop cruel imports: applying EU animal welfare standards to all products placed on the EU market* and *Setting the standards: defining animal welfare import requirements* by focusing specifically on meat chickens. It asks what meaningful import requirements should apply and argues that imports should provide welfare protection across the full production cycle equivalent to that required under modernised EU law. The report focuses on animal welfare, while recognising that EU producers also face broader environmental, food safety, animal health, and labour requirements.

This report examines chicken meat imports from Brazil, Thailand, Ukraine and the UK, which together accounted for 88% of EU imports in 2025. It considers the scale of this trade, the welfare risks and production systems involved, and the corporate and commercial structures behind the key supply routes. It then examines the limits of current import and trade instruments and sets out how enforceable import requirements could be incorporated into modernised EU legislation.

The central argument is straightforward: chicken products should not be placed on the EU market unless they have been produced in accordance with welfare standards equivalent to those required by modernised EU law, which should be informed by EFSA's scientific recommendations and reflect citizens' clear expectations for stronger animal welfare protection. Applying this benchmark to imports would help ensure that EU welfare reform is not undermined while supporting fairer conditions for EU producers.



CHAPTER 1: THE WELFARE DEFICIT

This chapter sets out why import requirements matter, the scale of EU chicken imports, and the welfare risks and regulatory differences across the principal exporting countries examined in this report.

96% of respondents to the European Commission's public consultation fully agreed that equivalent animal welfare standards should apply to food of animal origin imported from third countries.

WHY IMPORT REQUIREMENTS MATTER

Meat chicken production in both the EU and the principal exporting countries examined in this report is shaped by intensification, including fast-growing breeds, high stocking densities, and production systems designed to maximise output rather than welfare. EFSA has identified fast growth and high stocking densities as two of the biggest sources of welfare challenges in meat chickens, affecting their health, mobility, comfort, and ability to perform important behaviours.² These conditions can also increase disease pressure and reliance on antimicrobials, thereby contributing to antimicrobial resistance and wider public-health concerns. Their presence across domestic and imported supply chains demonstrates why EU welfare reform and equivalent import requirements need to advance together.

European citizens care deeply about the welfare of the animals farmed for food. There is strong support for improving current EU standards and applying equivalent requirements to imports.

- 96% of respondents to the European Commission's public consultation fully agreed that equivalent animal welfare standards should apply to food of animal origin imported from third countries.³
- In the 2023 Special Eurobarometer on animal welfare, 91% of Europeans considered protecting the welfare of farmed animals to be important, while 84% believe that the current animal welfare situation (where imports do not comply with EU welfare rules) should change, either by imposing import requirements or a very strict labelling system.⁴
- In a poll of European consumers, 78% of respondents agreed that imported animal products should be subject to the same welfare rules as products produced in the EU.⁵
- In a poll performed by Savanta, which covered 18 Member States, 77% of the respondents supported a requirement for imported chicken meat to meet the same or equivalent breeding and welfare standards as EU-produced chicken meat.⁶

This expectation is also reflected in EU Treaties. Article 13 TFEU requires the EU and the Member States to pay full regard to the welfare requirements of animals as sentient beings when formulating and implementing relevant policies. As EU welfare standards are strengthened, citizens can reasonably expect improved protection to apply not only to animals farmed within the EU but also to products entering the same market.

Import requirements also matter for the practical success of EU welfare reform. Where EU producers must meet more stringent standards than third-country suppliers, imported products may benefit from lower welfare-related compliance costs. This may create unfair competition for EU producers, weaken incentives to invest in higher-welfare production, and encourage supply chains to source from systems subject to weaker standards in order to reduce costs.

Applying stronger welfare standards to EU production while continuing to allow chicken products produced under weaker or less verifiable requirements onto the same market could also undermine consumer confidence in EU animal welfare reform.

STAKEHOLDER CONVERGENCE: DIFFERENT INTERESTS BUT A SHARED CONCERN

Animal welfare organisations, producer organisations and consumer groups often approach EU food policy from different perspectives. However, their positions converge on the need to prevent imported chicken products from being produced under weaker or less verifiable animal welfare requirements.*

World Animal Protection Thailand highlighted the importance of stronger regulatory requirements from an animal-welfare perspective, noting that where domestic standards remain below EU requirements, producers have limited incentive to change production practices beyond what is required for export markets.

AVEC, representing the European poultry meat sector, has argued that products placed on the EU market should comply with the same animal welfare standards required of EU producers. AVEC linked this to fair competition, while recognising that equivalent requirements would not remove all competitive differences between EU and third-country producers.

COPA-COGECA, the industry body representing European farmers and agri-cooperatives, similarly highlighted the additional regulatory costs borne by EU producers and called for reciprocity in farm production standards, warning that imports produced under lower or less verifiable standards can put additional pressure on EU producers and risk undermining family-farming models.

BEUC, the European consumer organisation, commented that "consumers expect their imported food to meet the same high standards as food produced in the EU, including on animal welfare." These perspectives show that equivalent import requirements are supported from different standpoints: improving animal welfare, creating fairer conditions for EU producers and meeting consumer expectations.

* Producer organisations often frame this as a call for "reciprocity". In this report, the relevant proposal is narrower: imported chicken products should be required to meet welfare requirements equivalent to those applied under modernised EU meat chicken welfare law.

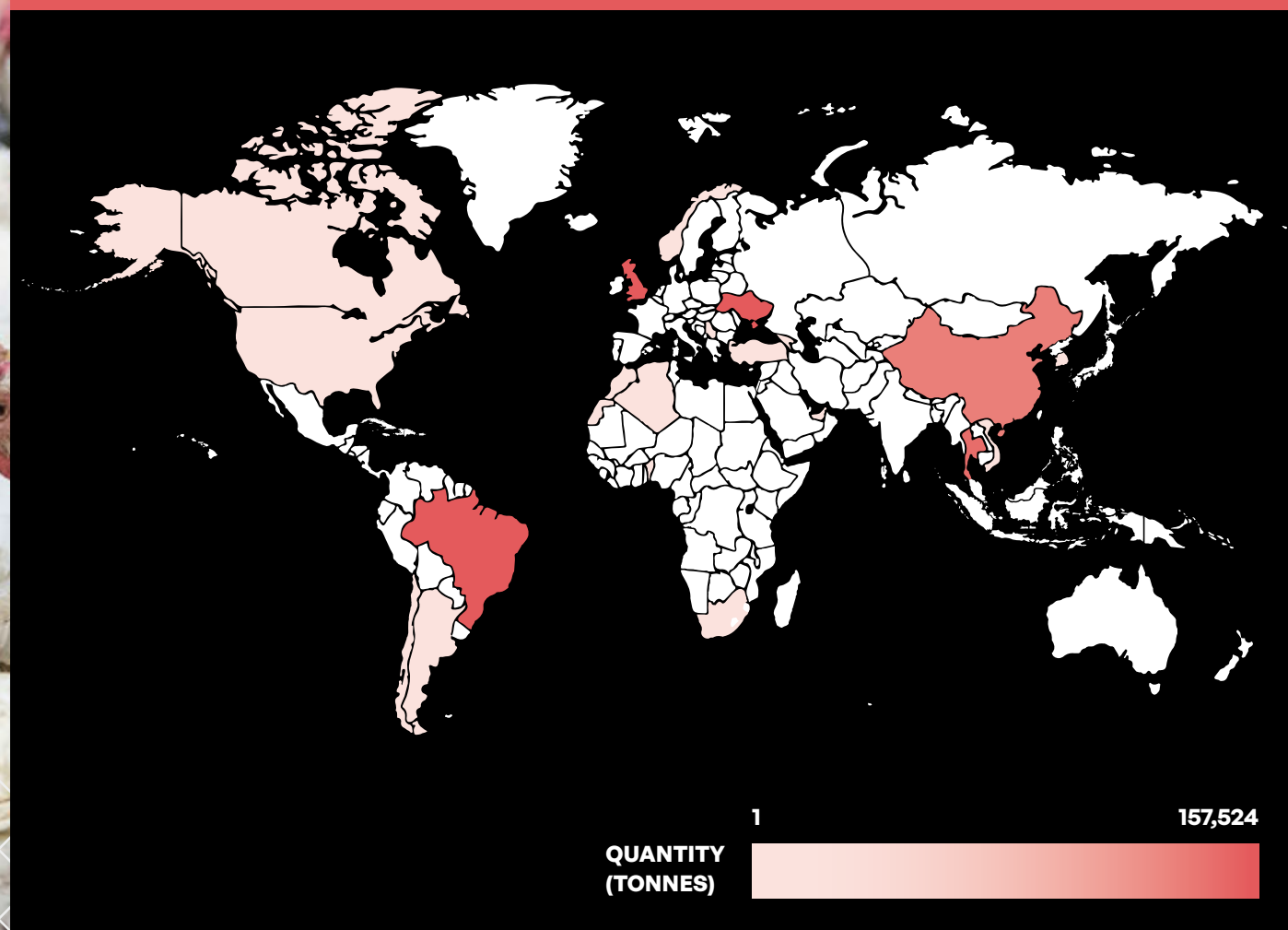
THE SCALE OF MEAT CHICKEN IMPORTS INTO THE EU

Scale and concentration of imports

Although the EU is a major poultry producer and net exporter, around 25% of poultry breast meat consumed in the EU is imported.^{7,8} In 2025, the UK, Ukraine, Brazil and Thailand accounted for 27%, 23%, 22%, and 16%, respectively, of chicken meat imports, together representing 88% of EU imports across the chicken products analysed.[†] Their combined share rose to 96% for raw chicken meat and offal alone. Together, imports from these four countries equated to approximately 274 million meat chickens in 2025.[‡]

FIGURE 1.
GEOGRAPHIC DISTRIBUTION OF EU IMPORTS OF BOTH RAW CHICKEN MEAT/OFFAL AND PREPARED/PRESERVED CHICKEN PRODUCTS BY WEIGHT, 2025.⁹

Shows countries exporting at least 1 tonne of selected chicken products to the EU27.



[†] Raw chicken meat/offal includes CN codes 020711, 020712, 020713 and 020714. Prepared/preserved chicken products are captured under CN code 160232. Source: COMEXT/Eurostat, extracted June 2026 (Eurostat, 2026).

[‡] Trade weight is used to estimate the approximate number of meat chickens represented by these imports (see Appendix 1 for conversion method). This is an estimate rather than a count of individual birds, but it illustrates the scale of animals potentially affected by import requirements.

FIGURE 2.
EU IMPORTS OF CHICKEN PRODUCTS FROM KEY SUPPLIER COUNTRIES BY WEIGHT AND THE ESTIMATED NUMBER OF CHICKENS REPRESENTED, 2025.



Across 2021-2025, imports from the four countries represented an estimated 1.34 BILLION MEAT CHICKENS (see Appendix 2 for the five-year import trend).

Country spotlights: law and practice in Brazil and Thailand

Current legal requirements are not necessarily weaker in exporting countries than in the EU. Some requirements are similar, while important differences remain in their scope, enforceability and implementation. Appendix 3 provides a detailed legislative comparison.

Brazil's legal framework

Animal welfare legislation in Brazil is based on constitutional protections against cruelty and a range of federal laws, decrees and administrative instruments covering animal protection, inspection, transport and slaughter.¹⁰⁻¹² However, the framework is fragmented and contains limited binding detail on meat chicken-specific issues such as stocking density and production practices. Chickens are also excluded from some transport provisions. While Brazilian law contains broad provisions intended to minimise pain and stress, it lacks the detailed binding requirements needed to address the main welfare risks faced by meat chickens throughout production. Further legislative detail is provided in Appendix 4.

Brazil's meat chicken production in practice

Brazilian meat chicken production is highly integrated and characterised by intensive production systems. Brazilian industry information identifies genetic selection as an important factor behind increased growth rates, with conventional chickens commonly slaughtered at around 42 days.¹³

Stocking density is another important issue. Recent Brazilian research describes higher stocking densities as a strategic means to maximise facility use and productivity.¹⁴ Recent monitoring of the Brazilian poultry sector also indicates continued intensification of housing systems and limited progress by major companies on structural issues including stocking density and genetics.¹⁵ For example, in the systems assessed, stocking densities approached 39 kg/m², with only around 27.7% of production estimated to operate below 30 kg/m².

Farm-level research in southern Brazil found good outcomes for some measures, including litter quality and access to feed and water, but poorer outcomes for lameness, behavioural expression, footpad dermatitis, and hock burns, alongside high stocking densities.¹⁶

These findings do not show that Brazilian production is uniformly worse than production under current EU standards. Rather, they show that practices that need to be targeted in EU reform, such as rapid growth and high stocking densities, are also embedded in Brazilian production. Furthermore, Brazil's limited and fragmented broiler-welfare framework, together with evidence of intensive practices and poor welfare outcomes, demonstrates why equivalence cannot be inferred from legislation or industry assurances alone. Stronger EU standards will therefore need corresponding import requirements backed by independent verification of conditions in supply chains serving the EU market. Recent EU action concerning Brazil under the EU's new antimicrobial import rules provides a parallel example of the need for verifiable production-related assurances (see Chapter 3).

Thailand's legal framework

Meat chicken production in Thailand is regulated by general animal welfare legislation, poultry-specific transport and slaughter rules, and the voluntary Good Agricultural Practices (GAP) standards.¹⁷⁻¹⁹ The main animal welfare law contains broad protections against cruelty. However, it exempts slaughter and mutilations and contains no comparable enforceable rules for key on-farm issues such as stocking density, breed, or cage systems.^{17,20,21}

Export-oriented producers commonly adopt GAP standards, but these do not establish binding, meat chicken-specific requirements across all production.^{19,22} Appendix 5 provides further legislative detail.

Thailand's meat chicken production in practice

Public evidence on the welfare of meat chickens in Thailand remains limited, particularly within export-oriented supply chains. Available evidence nevertheless indicates that intensive production systems remain common, including high stocking densities, rapid growth, limited environmental complexity, and the associated risks to leg health, behaviour, air quality, and disease.^{2,21}

A 2023 investigation of farms supplying Thai fast-food chains and some international markets documented injured and immobile birds, poor hygiene, handling concerns and continuous artificial lighting.²³ Although it cannot be confirmed that these farms supplied the EU, the findings illustrate welfare risks relevant to housing and handling requirements which could be addressed if import requirements cover the full production chain.

As in Brazil, the key issue is not that Thai production is uniformly worse than current EU production, but that practices EU reform should target are also present in Thai production systems. Equivalent import requirements should therefore address breed, stocking density, environmental conditions and other relevant stages of production.

Closely aligned exporters: the UK and Ukraine

United Kingdom

The UK retained much of the EU animal welfare framework after leaving the EU and remains broadly aligned with current EU requirements for chickens kept for meat production (see Appendix 3). A future UK-EU Sanitary and Phytosanitary (SPS) agreement could strengthen dynamic alignment in areas covered by the agreement. However, until its coverage of future EU animal welfare rules is clear, continued equivalence should not be assumed.

Ukraine

Ukraine is progressively aligning with EU legislation through both the accession process and the implementation of the EU-Ukraine Association Agreement, including its Deep and Comprehensive Free Trade Area. However, alignment remains incomplete, and implementation may be affected by the ongoing war. Equivalence should therefore depend on demonstrated implementation in practice, not planned legislative alignment alone.



A 2023 investigation of farms supplying Thai fast-food chains and some international markets documented injured and immobile birds, poor hygiene, handling concerns and continuous artificial lighting.

CHAPTER 2: THE CORPORATE LENS

This chapter examines how the commercial structure of the EU chicken import market can reinforce intensive, high-volume production. Imports are concentrated among a small number of large, vertically integrated exporters capable of supplying substantial and predictable volumes. The concern arises where corporate scale, buyer demand and public finance combine with weaker or less verifiable welfare requirements, enabling intensive production systems to remain commercially attractive and potentially expand their share of the EU market. The chapter also considers why these market structures make independent verification essential.

THE LARGE MULTINATIONALS BEHIND EU CHICKEN IMPORT ROUTES

EU chicken imports are supplied through a relatively small number of large, export-oriented poultry companies. These businesses have the production scale, processing capacity, and logistics needed to supply substantial, consistent volumes to the EU market. Below is a summary of four companies linked to the principal import routes examined in this report. Appendix 6 provides further details.

JBS GROUP

Relevant EU supply routes: Brazil → EU through Seara; and UK → EU through JBS-owned European poultry businesses

Why it matters: JBS is relevant through two routes: In Brazil, its subsidiary Seara is a major poultry producer and exporter. In Europe, JBS owns poultry businesses including Moy Park and Pilgrim's Europe, giving the group a significant presence across both EU import and European production supply chains.

Scale and EU relevance:

JBS is the world's largest meat processor and one of the largest factory-farming companies globally, operating in more than 20 countries and selling in more than 180 countries.²⁴

- JBS has the capacity to slaughter around 13 million chickens per day.²⁵
- Seara, JBS's principal poultry business, operates around 30 poultry processing facilities in Brazil, processes around 5.1 million birds per day, and exports to more than 130 countries.^{26,27}
- Through Moy Park and Pilgrim's Europe, JBS also has a substantial presence in European poultry production and trade.
- Moy Park is one of the UK's largest poultry producers, producing more than six million chickens per week.^{28,29}

BRF

Relevant EU supply routes: Brazil → EU

Why it matters: Alongside JBS/Seara, BRF is one of Brazil's largest poultry companies and forms part of Brazil's large-scale, export-oriented poultry sector.

Scale and EU relevance:

- BRF is a major Brazilian producer of poultry, pork and processed foods.
- In 2025, exports accounted for 45% of its net revenue, and poultry and pork together accounted for 31% of its net revenue.^{30,31} Public company reporting does not provide a poultry-specific breakdown of exports to the EU.

CHAROEN POKPHAND FOODS (CP FOODS)

Relevant EU supply routes: Thailand → EU

Why it matters: CP Foods is Thailand's leading poultry producer and is particularly relevant to the EU market through Thailand's substantial exports of prepared and preserved chicken products.³²

Scale and EU relevance:

- CP Foods operates in 17 countries and exports to more than 50 countries.
- It produces 685 million birds annually across Asia.³³

MYRONIVSKY HLIBOPRODUCT (MHP)

Relevant EU supply routes: Ukraine → EU

Why it matters: MHP is Ukraine's largest producer and exporter of chicken.³⁴ The EU is a key market for MHP's chicken products, and the company has expanded its presence in Europe through increased exports and the acquisition of European poultry companies.³⁵

Scale and EU relevance:

- In 2025, MHP slaughtered approximately 8.04 million chickens per week and produced 677,079 tonnes of poultry products.³⁶
- It reported exporting around 29% of its poultry production to the EU (equivalent to approximately 196,000 tonnes).³⁶

JBS has the capacity to slaughter around 13 MILLION CHICKENS per day.

COMPANY-LEVEL MARKET CONCENTRATION: UKRAINE

Company-level export data are not consistently published, making it difficult to calculate precise market shares for all major suppliers. However, Ukraine provides a clear example of how concentrated an EU chicken import route can be.

In 2023, the EU imported 163,276 tonnes of chicken meat from Ukraine,⁹ while MHP reported exporting approximately 160,000 tonnes of poultry meat to the EU that same year.³⁷ As MHP specialises in chicken, this suggests that MHP accounted for virtually all of Ukraine's chicken exports to the EU. A similar pattern was reported in 2024, when MHP stated that its exports to the EU were around 138,000 tonnes, compared with total EU chicken imports from Ukraine of 133,716 tonnes.³⁷

These figures are indicative rather than definitive, as company-level export data and official product-level import data are not directly equivalent. However, they show that some EU import routes can be highly concentrated, highlighting the need to verify at the establishment, exporter, or defined supply chain level rather than relying solely on country-level approval.

More than half of EU consumers say animal welfare affects their purchasing decisions, and 7 in 10 say they would pay more for higher-welfare food.

HOW MARKET STRUCTURES CAN REINFORCE INTENSIVE PRODUCTION

Scale and integration can undermine EU welfare reform

The companies profiled differ in geography, ownership, and product mix. The concern is not simply the size of these entities, but how their scale and degree of vertical integration may interact with unequal welfare requirements to affect competitive conditions. By controlling multiple stages of the poultry supply chain, from feed production to processing, distribution and export, they can operate intensive production systems at very large scale, supplying consistent volumes while maintaining close control over production and input costs. Where these production models operate under welfare requirements that are weaker or less verifiable than those applying to EU producers, differences in production standards can become a competitive advantage. Investment by EU producers in higher-welfare systems will be essential to delivering meaningful reform. However, if imports are not required to provide equivalent welfare protection, large exporters may be able to offer lower-priced products without making comparable investments in welfare. Their existing access to the EU market and substantial production capacity mean that they would also be well placed to respond to changes in demand and expand their market share. Without equivalent import requirements, this could shift production towards systems offering weaker welfare protection rather than improve the welfare of all chickens supplying the EU market. The scale of these companies also magnifies the consequences of weaknesses in transparency, certification and official oversight.

Buyer pressure and welfare incentives

Commercial buyers in the EU help shape the production incentives facing exporters. Retailers, food manufacturers and food-service companies require large, reliable volumes of chicken products at predictable prices. Where purchasing requirements do not include verified welfare standards, exporters have limited commercial incentive to adopt measures such as slower-growing breeds or lower stocking densities.

WHY CONSUMER CONCERN DOES NOT ALWAYS TRANSLATE INTO MARKET PRESSURE

More than half of EU consumers say animal welfare affects their purchasing decisions, and 7 in 10 say they would pay more for higher-welfare food. However, imported chicken meat often enters through food-service, processing and prepared-food channels, where businesses make purchasing decisions before products reach consumers and information about origin and production conditions may be limited. This weakens the market signal for higher-welfare production, allowing lower-cost supply chains to remain commercially attractive even where public support for animal welfare is high.⁵

Consumer preferences and voluntary purchasing commitments therefore cannot reliably close this gap. Appendix 7 illustrates how upstream purchasing decisions can weaken consumer market pressure. Equivalent import requirements would address this by applying to all chicken products placed on the EU market, including fresh, processed and prepared products sold through retail, food-service and other channels.

Public finance and consolidation

Public finance can reinforce unfair competitive conditions when it supports the expansion of intensive poultry production without corresponding welfare requirements. In Brazil, the growth of major poultry exporters was supported by the Brazilian National Development Bank's National Champions policy, which provided subsidised finance for mergers, acquisitions, and international expansion.^{38,39}

Subsidised finance helped large, vertically integrated exporters expand and consolidate their market position. By enabling these companies to scale up high-volume production at subsidised cost, such support can strengthen their competitive position relative to EU producers investing in higher-welfare systems. Where corresponding welfare requirements do not accompany this support, it may also reinforce intensive production models and increase the volume of products produced under weaker or less verifiable standards.

Taken together, these dynamics can create a commercial lock-in effect in the EU import market, rewarding intensive production even as EU policy seeks to raise welfare standards.

CHAPTER 3: HOW THE EU CAN CLOSE THE WELFARE GAP WHILE PROTECTING EU FARMERS AND CONSUMERS

The previous chapters have shown why equivalent import requirements are needed. The benchmark for import requirements should be the modernised EU standards, not the current baseline.

Because welfare conditions cannot be determined from the final chicken product, equivalent protection must be demonstrated through production standards, traceability, and verification across the supply chain. This chapter examines where existing EU import and trade instruments fall short and sets out how equivalent welfare protection could be incorporated into modernised EU legislation and enforced in practice.

WHERE CURRENT IMPORT AND EU TRADE INSTRUMENTS FALL SHORT

Slaughter equivalence shows both possibilities and weaknesses

The EU already applies welfare equivalence to imports at the point of slaughter. Regulation (EC) No 1099/2009 requires that imported meat come from animals killed under conditions at least equivalent to those required by EU slaughter regulations. This establishes an important precedent for attaching welfare-related production conditions to imports.

However, the slaughter regime also shows that formal equivalence is insufficient without effective verification and enforcement.¹ A 2026 DG SANTE audit of Chinese slaughterhouses identified systematic and long-term failures, including problems with stunning equipment and procedures.⁴⁰ Despite these findings, concerns were raised that exports continued.⁴¹ DG SANTE audits of poultry export systems in Brazil and Thailand have also identified weaknesses in official oversight and disease surveillance. In Brazil, concerns included establishment authorisation and the capacity of HPAI surveillance to ensure early detection; in Thailand, audits identified weaknesses in veterinary supervision and the surveillance and tracking of poultry diseases.^{42–46} Although the Brazil and Thailand audits concerned official health controls rather than animal welfare, they reinforce the broader need for continuing verification and effective corrective action. Taken together, these examples show that equivalence cannot depend solely on legislation and certification; credible approvals, audits, traceability, and suspension powers must support it.

Antimicrobial rules establish a broader precedent for production-related regulation

Imported meat must also comply with EU rules on residues of veterinary medicines and banned substances. From 3 September 2026, exporting countries must also provide assurances that certain EU restrictions on antimicrobial use have been complied with throughout animals' lives.⁴⁷ Under Commission Implementing Regulation (EU) 2026/1189, Brazil was removed from the relevant list of third countries authorised to export poultry and several other animal products to the EU with effect from 3 September 2026 because the Commission had not received sufficient guarantees that these requirements would be met. Brazil may be relisted in the future if it subsequently provides and the Commission accepts the necessary guarantees.⁴⁸

This provides a broader precedent for requiring third countries to demonstrate compliance with production-related conditions that cannot be verified from the final product alone. However, the antimicrobial rules do not establish welfare requirements across the broader conditions under which meat chickens are bred, reared, caught, and transported.

Trade agreements recognise animal welfare but rarely require equivalence

Beyond these legislative precedents, animal welfare may also be included in trade agreements. In practice, however, these provisions are usually framed in terms of dialogue and cooperation rather than enforceable requirements.

The **EU-Mercosur interim trade agreement**, which has applied provisionally since 1 May 2026, includes one animal-welfare-related trade condition, as shell eggs must comply with the EU Laying Hens Directive to benefit from tariff reductions. However, the shell-egg trade is marginal between the two blocs, while major animal-product imports, such as beef and chicken, are not subject to comparable welfare conditions.⁴⁹ Despite calls for their inclusion, the updated Partnership Agreement presented in 2024 did not change this position.^{49,50}

Other EU trade agreements follow a similar pattern. For example, the **EU-New Zealand agreement** includes cooperation on animal welfare and excludes meat derived from commercial feedlots from preferential treatment, while the modernised **EU-Mexico agreement** recognises animal sentience and commits the parties to improving implementation of welfare laws.^{51–53} However, neither establishes enforceable welfare requirements for imported chicken.

The ongoing **EU-Thailand FTA negotiations** provide a more immediate opportunity. Animal welfare has been discussed within the Sustainable Food Systems chapter, but public negotiation reports do not indicate that this has developed into enforceable requirements for poultry products.^{54–56} Given Thailand's importance as a supplier of prepared and preserved chicken products, the negotiations provide an opportunity to link expanded market access to meaningful welfare requirements for EU-bound products.²¹

Overall, while welfare conditions can be attached to trade preferences, their impact is limited where they apply only to marginal product categories or rely on cooperation rather than enforceable requirements. These limitations do not prevent the EU from introducing stronger import requirements. Eurogroup for Animals' legal assessment concludes that WTO law allows animal-welfare requirements to be applied to imports where they are designed in a non-discriminatory, proportionate and transparent way.⁵⁷

WHAT SHOULD IMPORT EQUIVALENCE MEAN IN PRACTICE

The European Commission has committed to reforming its outdated animal welfare legislation, including the standards for meat chickens. While the details are not yet known, the revised standards should be informed by EFSA’s scientific recommendations and the key welfare criteria in the European Chicken Commitment (ECC), including slower-growing breeds, lower stocking densities, and a ban on cages for breeding birds. Import requirements should therefore be benchmarked against the future modernised EU legislation, not the current baseline. This is necessary if the objective of improving animal welfare in the EU is not to be undermined by imported products produced to weaker standards.

Requiring imported chicken products to provide equivalent welfare protection would only be effective if equivalence were clearly defined. In practice, this means:

- **Requirements should provide equivalent welfare protection, but not necessarily identical in legal form.** Third countries should not have to copy EU legislation word-for-word, but their rules, assurance systems, and enforcement must deliver at least equivalent protection in practice. The equivalent level of protection could be measured against animal welfare indicators such as a positive list of breeds whose growth rate is limited to 50g per day; a stocking density equivalent or lower than in the EU, which should not exceed 30 kg/m²; and prohibition of cages in primary production for breeders.¹
- **They should apply across the full production chain and to all chicken products placed on the EU market.** This should include raw, chilled, frozen, prepared, preserved and processed products, so that welfare conditions cannot be avoided through product type or sales channel.
- **Equivalence must be demonstrable, enforceable and maintained over time as EU standards develop.** If the modernised legislation prohibits or restricts a production system on the basis that its inherent characteristics adversely affect animal welfare, equivalence shall not be established solely on the basis of comparable protection in practice.

WHY A CAGE-ONLY IMPORT RULE WOULD NOT CLOSE THE MEAT CHICKEN WELFARE GAP

The Commission’s Livestock Strategy refers to equivalent import requirements alongside the political focus on phasing out cages.⁵⁸ However, cages are not the principal welfare issue for commercial meat chickens, as they are generally reared in floor-based systems, although cages may be used for breeding birds. The absence of cages does not, by itself, ensure good welfare. EFSA identifies fast growth and high stocking densities as major sources of welfare problems for chickens reared for meat, alongside poor litter quality and environmental conditions.² Research on commercial farms using floor-based systems in Brazil found poor outcomes related to lameness, behavioural expression, footpad dermatitis, and hock burns, alongside high stocking densities.¹⁶ An import requirement limited to cages would also leave welfare during rearing, catching, and transport unaddressed, and would not remedy the verification weaknesses affecting the existing slaughter regime. It could therefore appear ambitious while leaving the principal welfare risks in EU-produced and imported chicken supply chains largely unchanged.

The absence of cages does not, by itself, ensure good welfare.



A LEGISLATIVE BLUEPRINT

Imports should not be treated as a separate afterthought in the reform of EU legislation. The modernised legislation should include a dedicated import-equivalence article that translates the principles set out in Section 3.2 into a binding market-access rule.

Stakeholder perspective: why legislation matters

The EU poultry sector also supports this approach. In an interview, AVEC argued that animal welfare requirements should be incorporated into EU legislation rather than addressed solely through future bilateral trade agreements, because substantial volumes of poultry already enter the EU under existing quotas and earlier trade agreements.

As AVEC explained, “the first option should be animal welfare legislation [...] because it applies to everyone the same.” AVEC also stressed that its position is not to require more from third-country producers than from EU producers: “We do not ask more, we just ask the same.”

COPA-COGECA has similarly argued that farm production standards should apply consistently to EU production and imports, with representatives describing the ideal for meat chickens as “complete reciprocity” between what is permitted in EU production and what can be imported.

The core elements of a dedicated import-equivalence article are set out below.

TABLE 1: LEGISLATIVE BLUEPRINT FOR A DEDICATED IMPORT-EQUIVALENCE ARTICLE IN MODERNISED EU MEAT CHICKEN WELFARE LAW.

Legislative component	What should be included	Purpose
Legal placement	The import-equivalence rule should be embedded in the main meat chicken welfare legislation as a dedicated article.	Ensures domestic and import requirements form part of the same reform framework.
Market-access rule	Chicken products should enter the EU market only where equivalent welfare protection has been demonstrated.	Makes welfare equivalence a condition of market access.
Product scope	The rule should cover raw, chilled, frozen, prepared, preserved and processed chicken products.	Prevents loopholes based on product type or sales channel.
Standard applied and updating mechanism	Assess imports against modernised EU meat chicken welfare standards and update requirements as those standards change, with defined transition periods where appropriate.	Prevents imports remaining tied to outdated standards.
Meaning of equivalence	Require equivalent welfare protection in practice, without requiring identical legislation. Equivalence could be measured against animal welfare indicators. If the modernised legislation prohibits a production system, equivalence shall not be established solely on the basis of comparable protection in practice.	Allows different legal and assurance systems while maintaining equivalent protection. Indicators verify equivalence because they measure outcome-based welfare criteria. It prevents an outcomes-based equivalence mechanism from inadvertently reopening cages.
Compliance route	Allow approval of third countries, regions, establishments or defined supply chains that demonstrate equivalence.	Creates a practical route for compliant exporters and avoids an all-or-nothing country test.
Verification model	Requires official assurances and the verification and enforcement mechanisms set out in Section 3.4.	Ensures equivalence is demonstrated rather than assumed.
Technical rules	Use delegated or implementing acts for detailed rules on evidence, certification, audits, approvals and suspension.	Allows technical detail to adapt while preserving the core legal obligation.

ENFORCEMENT AND VERIFICATION MECHANISMS

A market-access rule is only meaningful if the EU can verify compliance in practice. Legislation should therefore combine approval, certification, traceability, audits, corrective action, suspension powers and public transparency.

Layer 1: Approval and listing

Third countries, regions, establishments, or defined supply chains should be eligible to export to the EU only once the Commission has assessed that their systems can deliver the required animal welfare guarantees. Approval should be capable of being suspended where those guarantees are no longer credible.

Layer 2: Certification and official assurance

Each consignment should be accompanied by an official certificate or equivalent attestation confirming compliance with the relevant welfare requirements. Certification should be backed by inspections, records and official oversight, rather than treated as proof in itself. Border checks should verify that consignments come from authorised sources and can be linked to an approved production chain.

Layer 3: Traceability and segregation

Traceability does not, in itself, prove welfare compliance, but it is essential to verification. EU-bound products should therefore remain identifiable throughout the supply chain, with segregation where operators also supply non-EU markets. Recent Commission audits have highlighted traceability failures, demonstrating the importance of this requirement.⁴¹

Layer 4: Audits and verification visits

The Commission should audit third-country control systems, approved establishments and supply chains, with higher scrutiny targeted according to risk and previous non-compliance. The audit findings discussed in Section 3.1.1 demonstrate why results must directly inform continued approval and corrective action.

The new legislation must bring increased capacities and resources, particularly with audits dedicated to animal welfare, rather than audits integrating animal welfare within a broader SPS check.

Layer 5: Corrective action and suspension

Where evidence shows that equivalent welfare protection can no longer be reliably demonstrated, the Commission should be able to require corrective action and, where necessary, suspend approval of the country, establishment or supply chain. Precautionary suspension may be appropriate when serious failures in traceability or official controls undermine the reliability of certification.

Layer 6: Transparency and ongoing verification

Approval should not be permanent. The Commission should publish the status of approvals, suspensions, reinstatements and major corrective actions, and require ongoing monitoring and periodic reassessment. This would allow competent authorities, importers, retailers and civil society to verify whether market-access requirements are being enforced in practice, while avoiding disclosure of commercially sensitive information.

TRANSITION AND IMPLEMENTATION

Import requirements should be introduced in a way that is firm on welfare protection and enforceability, realistic on timing, and non-discriminatory, applying to EU and third-country producers alike. Transition periods should be aligned so that imported products are not given a weaker or longer route to compliance. Appendix 8 illustrates a possible transition pathway.

Technical guidance and support: Reflecting unimplemented aspects of FTAs, the European Commission should provide clear guidance, training and technical assistance on how equivalence will be assessed, what evidence will be required, how certification should work, and what traceability systems exporters will need to maintain. Existing cooperation mechanisms within FTAs and other partnerships could support capacity-building and improvements in animal welfare in exporting countries seeking to maintain EU market access. Brazil is covered by the provisionally applied EU-Mercosur interim trade agreement, which provides a framework for promoting animal welfare standards, while the EU-Ukraine Association Agreement requires Ukraine to approximate its animal-welfare legislation to EU law. The ongoing EU-Thailand FTA negotiations provide an opportunity to establish comparable cooperation on animal welfare.

Major exporters supplying the EU, including MHP, JBS, BRF and CP Foods, are large multinational companies with substantial production and financial capacity. AVEC therefore argued that compliance with equivalent welfare requirements should not be considered unrealistic, particularly where clear transition periods, guidance and technical support are provided.

Transition should support compliance, not become an alternative to it. Where requirements are not met by the end of the transition period, the response should be increased scrutiny, corrective action and, where necessary, suspension rather than reduced requirements.



PRIORITY RECOMMENDATIONS AND CONCLUSION

PRIORITY RECOMMENDATIONS

Based on the evidence and analysis presented in this report, the following priority actions are recommended:

- **Include effective import requirements in modernised EU meat chicken welfare legislation, benchmarked against the standards set by that legislation, which should themselves be informed by EFSA science and key welfare criteria reflected in the ECC.** This should form part of the same legislative framework as domestic reform, so that the two remain aligned over time.
- **Apply the requirements across the full meat chicken production chain and to all chicken products placed on the EU market,** including fresh, frozen, prepared, preserved and processed products, regardless of whether they are sold through retail, food service or other channels.

- **Require equivalent welfare protection in practice, without requiring identical legislation.** Make market access dependent on demonstrating and maintaining that equivalence through credible assurance and enforcement, including approval, certification, traceability, audits, corrective action and suspension powers.
- **Ensure EU trade agreements and tariff preferences support welfare equivalence, and use cooperation mechanisms to support the transition to higher-welfare standards.**
- **The European Commission should provide clear transition periods, guidance and technical support,** without allowing temporary arrangements to become permanent exemptions.

CONCLUSION

It is important not to lose sight of the animals behind these trade flows. Every tonne of imported chicken meat represents individual sentient animals capable of suffering and of experiencing positive states such as comfort and pleasure. Import requirements ultimately matter because they determine the level of protection afforded to these animals throughout their lives.

The EU's current approach to animal welfare leaves a significant welfare gap. As EU standards are modernised, corresponding import requirements will be needed to close that gap. Existing import controls provide important safeguards for certain areas. However, they do not address how chickens in third countries are bred, reared, housed, caught, or transported, leaving key welfare concerns unaddressed. Consequently, chicken products can enter the EU market without demonstrating that the animals were protected to standards at least equivalent to those applied within the EU.

The commercial structure of the import market can reinforce this risk, as EU imports are highly concentrated among a small number of countries and large, vertically integrated companies with the scale and infrastructure to meet EU demand at competitive prices. In some cases, these commercial advantages have been reinforced by subsidised public finance. Where EU market access and purchasing decisions do not require independently verified equivalent welfare protection, third-country exporters operating under weaker or less verifiable requirements may gain an unfair competitive advantage over EU producers. Over time, this risks shifting market share and production towards third-country systems offering weaker welfare protection, rather than improving welfare across all chicken products sold in the EU. Consumers may also have limited visibility into these products, particularly when imported chicken enters through food-service, processing, and prepared-food channels.

Import requirements based on equivalent welfare protection offer a practical response. The EU already applies production-related conditions to some imported animal products, including requirements relating to slaughter and antimicrobial use. Animal welfare is recognised in EU trade policy, and WTO law does not prevent appropriately designed animal welfare import measures. Therefore, the central issue is not whether the EU can act, but whether it will establish clear, meat-chicken-relevant requirements, credible verification, and effective consequences for non-compliance.

Equivalent import requirements would:

- Improve the welfare of meat chickens beyond the EU's borders by requiring stronger protection across the full production cycle.
- Ensure that EU welfare reform applies consistently to chicken products sold on the EU market, thereby supporting the objective of the legislation.
- Enable EU producers to transition to higher-welfare production systems by creating fairer conditions.
- Strengthen consumer trust and protect the EU's public morals on animal welfare.
- Reduce reliance on labelling as the main safeguard.
- Support broader public health objectives by addressing welfare conditions that can contribute to disease pressure and antimicrobial reliance.
- Protect the EU's reputation and strengthen its leadership on animal welfare by avoiding the perception that the EU requires higher-welfare production at home while continuing to accept lower-welfare production abroad.

The principle is straightforward: as the EU requires its own producers to move towards higher-welfare standards, chicken products produced under weaker or less verifiable welfare requirements should not continue to enter the same market without demonstrating equivalent protection.

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APPENDICES

APPENDIX 1

Chicken Conversion Method

Official trade data are reported by weight and value rather than number of animals, so imported product weight was converted into an approximate number of meat chickens using the method below.

For raw meat/offal products, the estimate was based on an average meat chicken carcass weight. For prepared/preserved products with varying chicken content, a standardised assumption of 50% chicken content was used. These equations are based on an average broiler chicken carcass weight being about 71% of live slaughter weight 59 and an average live chicken slaughter weight of around 2.2 kg².

EQUATIONS FOR CONVERTING TONNES OF CHICKEN MEAT TO THE NUMBER OF CHICKENS

1. FOR RAW CHICKEN MEAT

TOTAL TONNES OF RAW MEAT

CHICKEN CARCASS WEIGHT IN TONNES (0.0016)

=

NUMBER OF CHICKENS

2. FOR ROUGH ESTIMATION OF PRES./PREP. CHICKEN MEAT

Same, but divide answer by two, under working assumption that prepared/preserved products equate to 50% of a chicken.

TOTAL TONNES OF RAW MEAT

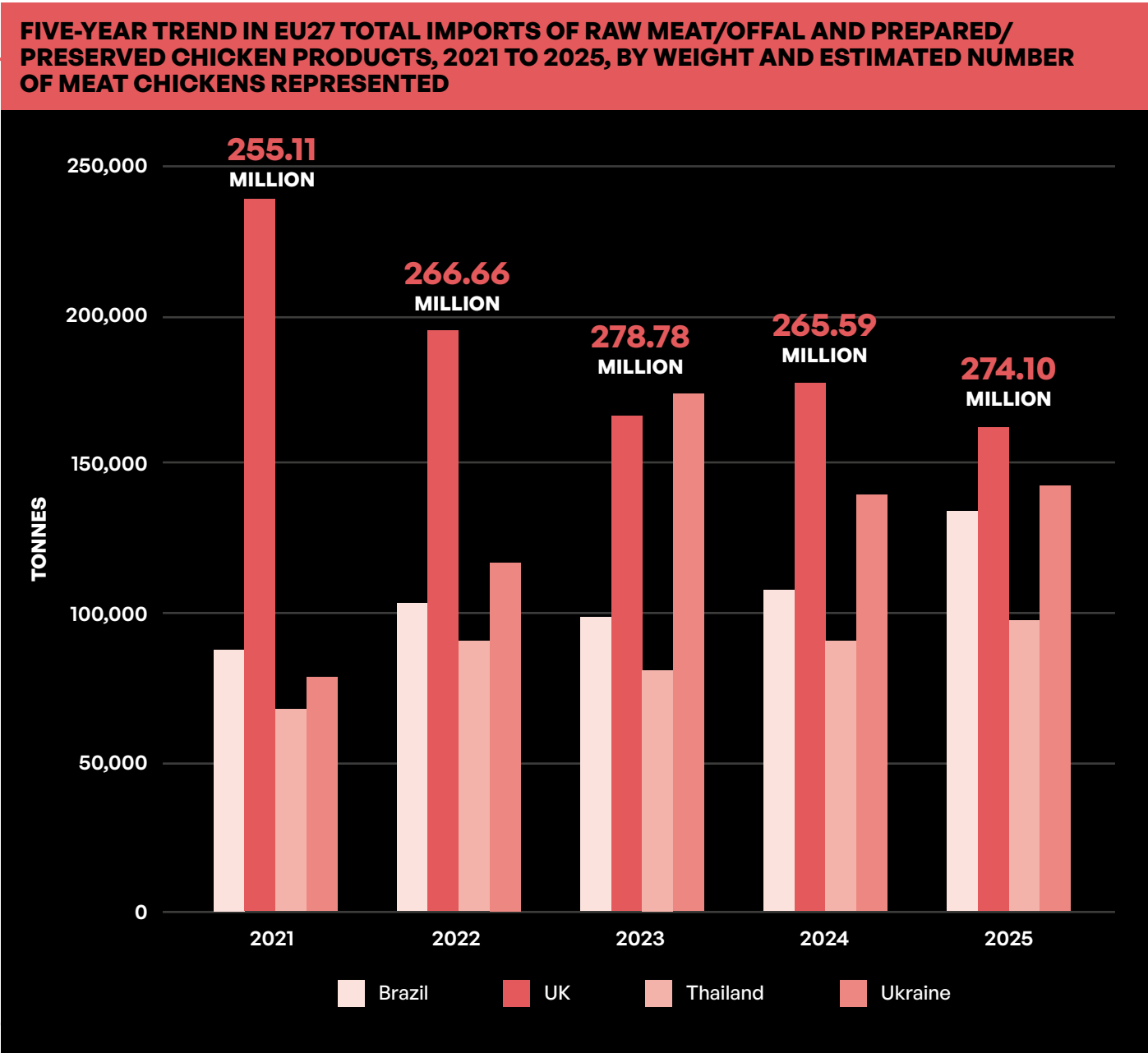
CHICKEN CARCASS WEIGHT IN TONNES (0.0016)

/ 2

=

NUMBER OF CHICKENS

APPENDIX 2



APPENDIX 3

Comparison of meat chicken welfare requirements in key exporting countries

This table compares selected legislative requirements in the EU, the UK, Thailand, Brazil and Ukraine with EFSA's scientific recommendations and relevant European Chicken Commitment criteria included as reference points for stronger welfare protection. The comparison shows that current legal requirements are not substantially different across all jurisdictions, although important differences remain in their scope, strength and enforceability.

	EU	UK	Thailand	Brazil	Ukraine	ECC	EFSA (2023)
Max Stocking Density	33–42 kg/m ²	33–39 kg/m ²	None	None, although practice is similar to the EU	33–42 kg/m ²	≤30 kg/m ²	11 kg/m ²
Cages permitted	Breeders only	Breeders only	Not prohibited	Not prohibited, nor used	Breeders only	No	No
Restriction on Breeds	None	None	None	None	None	Positive list of breeds	Slower growing
Routine mutilations permitted	Beak trimming	Beak trimming	Not prohibited	Not prohibited	Beak trimming	Not specified	Avoid all
Transport Duration	No maximum	No maximum	No maximum	No maximum	No maximum	Not specified	Not specified

The measures used are not intended to provide a complete welfare assessment. Breed, stocking density and transport relate directly to major welfare risks for meat chickens, while cages and routine mutilations illustrate differences in the scope of legal protection. Measures on slaughter and antimicrobial use are not included because exporting countries are required to comply with the EU's rules for these areas.

Comparison of selected meat chicken welfare standards in the EU and key exporting countries. Table entries indicate the presence or absence of selected explicit legal or standard-based requirements. They do not provide a complete assessment of implementation, enforcement or commercial practice. “Not prohibited” does not necessarily mean that a practice is routinely used. Sources: ^{2,15,17,20,60–73}

APPENDIX 4

Brazilian Legislation

Animal welfare legislation in Brazil stems from its 1988 constitutional references to general animal protection against cruelty.¹¹ Federal-level legislation has emerged from this foundation, including laws and decrees relevant to animal protection, inspection, transport and slaughter.^{10,74,74} The Ministry of Agriculture, Livestock and Food Supply (MAPA) also issues normative instructions, resolutions, and ordinances relevant to farmed animal welfare.¹¹ However, these instruments vary in scope and enforceability, and some do not carry punitive weight.

Brazil is also a signatory to the World Organisation for Animal Health's animal welfare guidelines. However, the guidelines do not carry legal weight nationally.

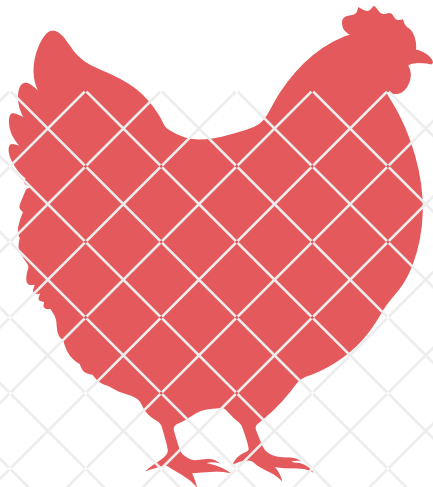
The most significant Brazilian federal laws and decrees in relation to animal welfare:^{10,75}

- Federal Law 9.605/1998- Environmental Crimes Law.
- Federal Law 7.889/1989- Inspection of Products of Animal Origin.
 - Decree no 9.013/2017- Regulation of Industrial and Health Inspection of Animal Products; RIISPOA (covers slaughterhouse welfare, including non-stun slaughter).
- Federal Law 8.171/1991- Agricultural Policy Law.
 - Decree no.5.741/2006-Organise the Unified Agricultural Health Care System; SUASA (covers transportation of animals).
- Federal Law 14.515/2022- Internal monitoring of animal welfare by industry, marking an end to governmental inspections of slaughterhouses (not applicable to EU exports).

The most significant Brazilian NIs, resolutions, and ordinances created or used by MAPA:^{10,75}

- Slaughter
 - NI 03/2000: Technical Regulation of Stunning Methods for Humane Slaughter of Meat Animals.
 - NI 12/2017: Slaughterhouse staff must be qualified.
 - Ordinance 365/2021: Technical guidelines for humane slaughter (an update to NI 03/2000).
- Animal transport
 - Ordinance 575/2012: Standardisation of animal road transport.
 - Resolution 675/2017: Mandates that live animal transport shall avoid unnecessary suffering and injury and minimise animal stress (created by the transport body CONTRAN).
 - NI 46/2018: Minimum transportation standards aligned with WOA but excludes chickens.
- Miscellaneous
 - NI 56/2008: Good Animal Welfare Practices Guidelines (manuals covering welfare on farm, during transport, and at slaughter—not legally required).
 - Resolution 524 of 2011: Created/restructured the Permanent Technical Commission for Animal Welfare.
 - NI 54/2018, NI 45/2016, and NI 55/2011—Administrates use of growth hormones.
 - NI 110/2020 and NI 40/2020: Concerns animal feed ingredients.

Overall, Brazilian law contains broad provisions intended to minimise stress and pain, but has few detailed welfare requirements for broiler chicks and chickens at each stage of production. Some individual states have additional animal protection provisions, but these are primarily directed at wild and companion animals.⁷⁶ For example, even the state of Paraná, which produces the most chickens of all states,⁷⁷ lacks poultry-specific protections. In addition, Brazil's commitments to the World Organisation for Animal Health's (WOAH) guidelines do not carry any binding legal weight.⁷⁸ Several legislative proposals could strengthen animal protection, including bills on animal sentience, humane slaughter, tracking welfare violations, severe confinement, and low-welfare labelling, but because they have not been enacted, they do not currently provide enforceable protections for broiler chickens.^{10,76}



APPENDIX 5

Thailand Legislation

The most significant national legislation in Thailand relating to animal welfare.²⁰ For their respective English versions, see: ^{17,18,22,68,79}

- *Cruelty Prevention and Welfare of Animal Act (CPWAA), B.E. 2557 (2014)*
 - The main national animal welfare legislation.
- *Criminal Code (8.E. 2499?)*
 - This is predominantly superseded by the CPWAA, but it is still in place.
- *Animal Disease/Epidemics Act 8.E. 2551 (2008)*
 - Health and economics oriented.
- *Agricultural Standards Act 8.E. 2551 (2008)*
 - Code of Practice for Control of the Use of Veterinary Drugs
 - Enables further legislation to be enacted, but it seems none has been, as yet
- *Protection of Poultry During Transport (PPT), B.E. 2554 (2011)*
- *Protection of Poultry at Slaughter (PPS), B.E. 2554 (2011)*

Broiler production in Thailand is regulated by a combination of general animal welfare legislation, poultry-specific transport and slaughter rules, and Thailand's Good Agricultural Practices standards for poultry farms.¹⁹ Thailand's main animal welfare legislation, the Cruelty Prevention and Welfare of Animals Act, contains broad protections against cruelty but exempts slaughter and mutilations.

Thailand is an unusual case because it also has poultry-specific regulations covering transport and slaughter: the Regulations on the Protection of Poultry During Transport B.E. 2554 (2011), and the Regulations on the Protection of Poultry at the Time of Killing or Slaughtering B.E. 2554 (2011). These rules provide some tailored protection for poultry and state that, where poultry is exported, the welfare requirements of importing countries take precedence. However, because the EU currently requires welfare equivalence only for slaughter, and not for the full broiler production chain, this still leaves a significant welfare gap for imported chicken products.

Thailand's government has also published Good Agricultural Practices (GAP) for broiler farms (TAS 6901-2017), a non-binding framework intended to support quality, safety, and welfare standards in broiler production.²¹ The GAP standards are the main vehicle for improving farm animal welfare in Thailand.²¹ They are commonly pursued by export-oriented producers, particularly where alignment with EU requirements is needed. However, producers supplying the domestic market rarely adopt these standards, as there is neither a regulatory mandate nor strong domestic consumer demand for higher-tier welfare compliance.²¹ Serious welfare concerns, therefore, remain, especially for broilers not destined for export.²¹ Thailand is also a signatory to WOA's guidelines, but these are not legally binding.⁷⁸

- Key weaknesses in Thailand's broiler welfare framework include:^{18,80–82}
- The exclusion of slaughter and mutilations from the main animal welfare law.
- The absence of binding on-farm broiler-specific welfare standards applying to all production.
- Perceptions that the transport and slaughter laws are non-binding due to a lack of awareness.
- No evidence of new legislative proposals to improve broiler welfare standards.

APPENDIX 6

Expanded Profiles of Major Poultry Companies Supplying the EU

This appendix provides additional information on the scale, corporate structure and financial performance of the major poultry companies profiled in the main report. The companies were selected because of their importance within the principal supply routes for chicken products entering the EU from Brazil, Thailand, Ukraine and the UK. The information supplements the shorter profiles presented in the main text.

JBS Group

Export route: Brazil → EU / UK → EU

Why it matters: JBS is relevant to EU chicken imports through two routes: its Brazilian poultry division, Seara, and its European poultry and prepared-food businesses, including Pilgrim's Europe and Moy Park.

JBS Group scale:^{24,25,83}

- JBS is the world's largest meat processor and one of the biggest factory-farming companies globally, slaughtering more animals than any other company.
- It operates in more than 20 countries and sells in more than 180 countries.
- JBS reported a record revenue of US\$ 86.2 billion, including US\$ 2 billion in profit in 2025.*
- JBS has the capacity to slaughter 5 billion chickens per year, equivalent to over 13 million chickens per day.

Brazil route: Seara:^{26,27}

- Seara is JBS's Brazilian poultry division and one of Brazil's major chicken producers and exporters.
- It operates around 30 poultry processing facilities in Brazil.
- It processes about 5.1 million birds per day (equivalent to over 1.8 billion chickens per year).
- It exports to more than 130 countries, and in 2025, Seara achieved the highest export volume in its history.
- Seara's net revenue in 2025 was US\$ 9,171 million, including a net profit of US\$ 1,148.

UK route: Pilgrim's Europe and Moy Park Holdings:^{28,84,85}

- Pilgrim's Europe includes Moy Park, Pilgrim's UK and Pilgrim's Food Masters.
- Moy Park is one of the UK's largest poultry producers and is owned by Pilgrim's Europe.
- Moy Park produces more than six million chickens per week.
- In 2024, Moy Park reported operating profits of £98.1 million (~ US\$ 131.2 million).

* Monetary figures are reported in the currency used in the company reports and then, where necessary, converted to US dollars to allow comparison.

BRF:^{30,31}

Export route: Brazil → EU

Why it matters: BRF is another major Brazilian poultry and processed-food company relevant to EU chicken imports from Brazil. Alongside JBS/Seara, it forms part of Brazil's large-scale, export-oriented poultry sector.

- In 2025, BRF reported a net revenue of R\$ 164 billion (~US\$ 31.54 billion), including a profit of R\$ 358 million (~US\$ 68.8 million; down from US\$ 311 million in 2024).
- 55% of its net revenue came from sales in Brazil.
- 45% of its net revenue came from exports.
- 31% of its net revenue came from poultry and pork sales.

Charoen Pokphand Foods (CP Foods):^{33,86–89}

Export route: Thailand → EU

Why it matters: Charoen Pokphand Foods, hereafter CP Foods, is one of the world's largest poultry producers and Thailand's leading poultry producer. CP Foods is particularly relevant to the EU market because a significant proportion of its exports consists of processed chicken products, such as cooked or prepared meat. These foods are particularly suited to meeting international regulatory and food safety requirements and therefore facilitate access to export markets, including the European Union.³²

- CP Foods reported total sales revenue of 571,135 million baht (~US\$ 17.1 billion), including profit of Bt 252 billion (~ US\$ 760.6 million).
- It operates across 17 countries and exports to over 50 countries worldwide.
- Each year, CP Foods produces 685 million birds across Asia.
- 38% of its sales revenue comes from its Thai operations, of which 5% comes from exports.
- CP Foods operates a fully integrated "feed-to-food" system, controlling processes from animal feed production and farming to processing and distribution.

Myronivsky Hliboproduct (MHP):³⁶

Export route: Ukraine → EU

Why it matters: Myronivsky Hliboproduct, hereafter MHP, is Ukraine's largest producer and exporter of chicken. It is also one of Ukraine's largest agro-industrial companies and operates an integrated system that controls all stages of production, from feed to processing and distribution.³⁴ The EU represents a key market for Ukrainian poultry, and MHP has expanded its presence in the region through both increased exports and acquisitions of European poultry companies, strengthening its position as a significant non-EU supplier.³⁵

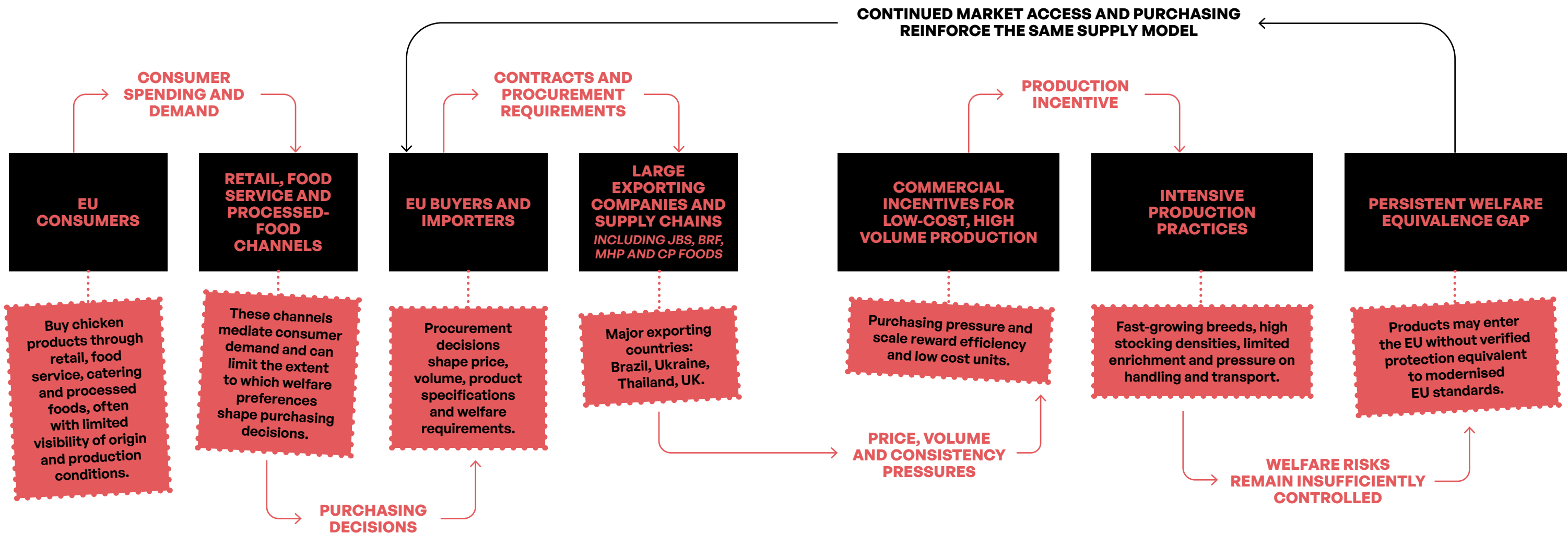
In 2025, MHP:

- Slaughtered 8.04 million chickens per week.
- Produced 677,079 tonnes of poultry.
- Exported 29% of its poultry production to the EU, equating to around 196,000 tonnes.
- Made US\$ 1,926 million from poultry meat sales, including US\$ 317 million from exports.



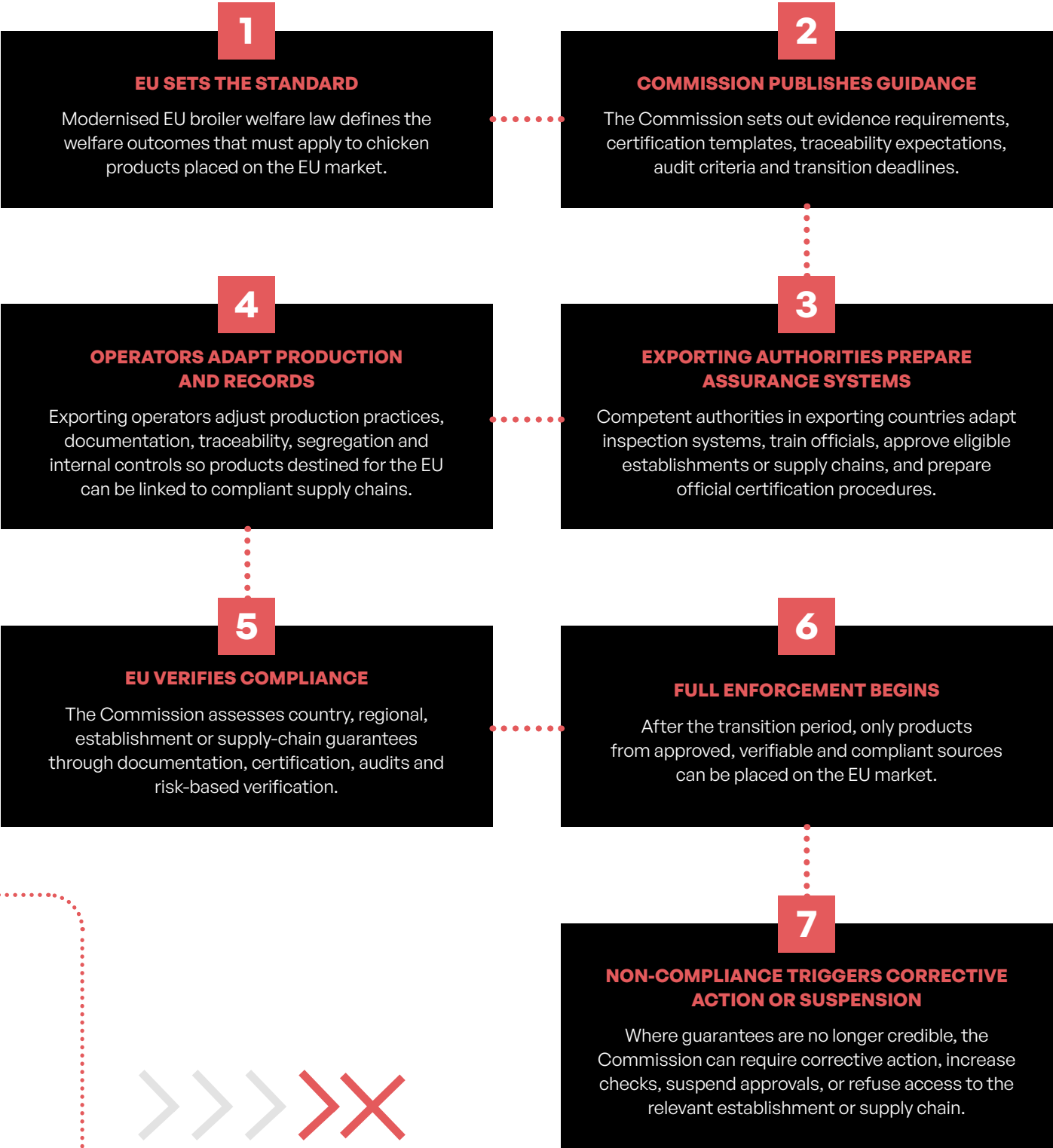
APPENDIX 7

How EU consumer spending can reinforce lower-welfare chicken supply chains where purchasing decisions and market access do not require verified welfare equivalence.



APPENDIX 8

Making transition workable:
Practical implementation pathway



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