



POLICY REFORM TO IMPROVE ENFORCEMENT OF AND COMPLIANCE WITH EXISTING LAWS

AUTHOR: S. HILTON, A. HANSEN

Review: A. Bansal, V. Cox

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CONSIDERED

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Animal Welfare – Policy reform to improve enforcement of and compliance with existing laws

Author: Sam Hilton and Amanda Hansen

Review: Akhil Bansal and Vicky Cox

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For questions about the content of this research or about the research process, please contact Sam Hilton at sam@charityentrepreneurship.com.

Executive summary

Even within countries that we typically think of as high-welfare – such as the UK or EU countries – there is evidence of non-compliance with existing animal welfare legislation. The available data from inspections across the UK and the EU suggest that non-compliance rates vary in the region of 5%–55%, with an average of ~25%. This suggests that although these countries might appear as high-welfare, the reality on farms and the reality for farmed animals might be very different. Closing this compliance gap could be a good way to improve the lives of farmed animals.

Within these countries, there seems to be three leading reasons for why legislation is not complied with: 1) Unclear, vague regulations with legal loopholes, 2) lack of concern for animals by farmers (and politicians) attitudes, and 3) resource constraints limiting farmers ability to comply and governments ability to enforce. Addressing these issues and enabling compliance with and strong enforcement of animal welfare legislation is potentially a critical step on the theory of change of reducing the suffering of farmed animals. A new organization could: explore how to close compliance gaps; ensure that future legislation is not vague, free from loopholes and enforceable; and/or support and promote various enforcement mechanisms such as CCTV, inspections, and certification schemes.

The most evidence-based intervention to improve compliance is taking legal action against companies (or government agencies) for not complying with (or enforcing) animal welfare legislation. However, whilst there are lots of cases of individual farms being taken to court, there are fewer examples of large scale changes. Therefore the scope of this approach and the number of animals helped might be quite limited. Other approaches such as policy change advocacy on enforcement (eg. lobbying for mandatory CCTV in all farms, not just slaughterhouses) or ensuring future laws are enforceable have less of an evidence base, but are more neglected (which in part contributes to the limited evidence base). All the interventions are to some extent technically complicated and tractability may be an issue across the area.

Overall, given this limited evidence base, it is difficult to evaluate which approach would work best, or how much impact an animal advocacy organization in this space would have. When compared to the other top animal welfare interventions, we concluded that this is not currently an idea worth recommending to charity founders.

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1 Introduction

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

Policy reform to improve enforcement of and compliance with existing laws was chosen by CE research staff as a potentially promising intervention within animal welfare. This decision was part of an eight-month process designed to identify interventions that were most likely to be high-impact avenues for future charity entrepreneurs. This process began by listing nearly 275 ideas and gradually narrowing them down, examining them in more and more depth.

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

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

1.1 Acknowledgements

We have drawn heavily on the unpublished Animal Ask report “Enforcement of farmed animal protection laws” written by George Bridgwater, Max Carpendale, and Ren Springlea, the Animal Ask report “[Deterrence theory and empirical evidence of increasing compliance with the law](#)” written by George Bridgwater, and the Rethink Priorities report “[Do countries comply with EU animal welfare laws?](#)” written by Neil Dullaghan. We are extremely grateful to those authors.

2 Background

The intervention explored in this report is policy reforms to improve compliance with and enforcement of existing farmed animal welfare laws. Various sources of evidence suggest that compliance rates with animal welfare law can be quite low meaning that farmed animals are not protected from illegal harms.

2.1 Why do farms not comply with the law?

There are various reasons why farmers may decide not to comply with farmed animal welfare laws.

A 2019 survey of Chief Veterinary Officers in the EU suggested that the most frequent reasons why animal welfare law is not complied with are **unclear regulations** and **farmer attitudes**, followed by various issues to do with **resource constraints**: insufficient knowledge, lack of control resources and financial constraints. Neil Dullaghan states that *“After reading various reports from EU audits of national inspections systems these **farmer attitudes** appear to be that farmers believe that other producers are not following the rules, that farmers do not understand the purpose of the legislation, or they see the proposed measures as incompatible with industrial farming”* ([Dullaghan, 2020](#)).

A study of court cases for farmed animal welfare violations noted that offenders are likely to highlight health or economic problems as a justification for breaking animal welfare law and that "financial and psychiatric problems are risk factors" ([Väärikkälä et al. 2020](#))

The key reasons vary depending on the size of the farm. Bridgwater et al., states that, based on their expert interviews, non-compliance in small farms often is caused by resource constraints, ignorance, or negligence, whereas non-compliance on larger farms often is motivated by economic calculated gains (Bridgwater, Carpendale, and Springlea, 2022 [Unpublished]).

2.2 Why are the laws not enforced?

The above set out key reasons farmers might not keep to farmed animal welfare laws. However, an underlying reason that enables all of the above factors is a lack of enforcement by governments.

The reasons why governments do not enforce animal welfare laws are unclear. Based on our expert interviews we think **the key driver is a lack of political will** or interest in protecting animals or in upsetting the agriculture sector. Another key factor is the view that **many farms have very small profit margins**, especially small family farms. This makes it difficult to place burdens on farms, whether penalties for non-compliance or asking farms to cover the costs of enforcement. A final factor that experts suggested is a possible **lack of qualified vets for carrying out inspections**.

Below we consider in a bit more depth three factors that affect enforcement:

1. The problem of vague unenforceable laws and legal loopholes
2. The problem of member states not adhering to EU laws
3. The benefits of private certification agencies

The problem of vague unenforceable laws and legal loopholes

A significant proportion of animal welfare laws contain either exceptions or vagueness that allows the farmers to not comply with the spirit of the law. For example some animal welfare laws require that farm animals do not undergo “unnecessary injury or suffering” ([Ceccarelli, 2022](#); [Eurogroup for Animals, 2022](#)) or have “the right to suitable environment” ([legislation.gov.uk, 2006](#)) but what is “unnecessary” or “suitable” is unclear, not specified in the law, and mostly based on existing common practice. In combination either with a lack of willingness from enforcers to challenge common farming practices or an inability to enforce the rules, this can result in laws that are essentially never enforced or complied with. This issue was highlighted by 7 out of the 10 experts we talked to and in various reports such as [Morton et al. 2020](#). For more on this and specific examples see the section below on routine non-compliance.

Countries not adhering to EU laws

The EU has put various animal welfare provisions into Directives. In theory EU member states should transpose those directives into local legislation and ensure they are enforced and that the animals are protected. Dullaghan estimates that:

- “~52 million to ~116 million pigs (35%–86% of EU total) on average are being tail docked without the required alternative methods for reducing tail biting being implemented.” ([Dullaghan, 2020](#))
- “~1.5 billion to ~4.6 billion broiler chickens slaughtered each year (21%–66% of EU total) may be stocked at high densities without the required additional welfare conditions.” ([Dullaghan, 2020](#))

Possible reasons

- Generally low adherence to EU directives across the board
- **Vagueness.** Directives are likely to be vague given they are a compromise position that needs to apply to all member states. This causes problems as discussed above. For example, the EU commission can not decide what penalty a member state should impose, but can only decide that the penalty should be “effective, proportionate and dissuasive” ([European Court of Auditors, 2016](#))
- **Costs.**

It may also be possible that analogous problems occur elsewhere outside the EU, with regional/state governments not enforcing national/federal laws.

Enforcement through private certification agencies

Many countries have non-government certification schemes that provide assurance on animal welfare to consumers ([Main et al., 2014](#)). For example the main such schemes in England are [Soil Association](#), [RSPCA Assured](#), and [Red Tractor](#). These often require independent inspections and as such provide an additional path for enforcement. Such schemes have to toe the line between being strict enough that evidence of low welfare will not damage their reputation and lenient enough that farmers who voluntarily sign up do not find them overly burdensome. Overall such schemes will help push up the rate of compliance. That said these schemes could do more to incorporate animal welfare concerns into their assessments ([Main et al., 2010](#)).

2.3 Rates of standard non-compliance

The available data from inspections on farms suggest that non-compliance rates vary in the region of 5%–55%, with an average of ~25%. Most of this data is from developed countries with more progressive farmed animal welfare regulations.

Country	Non-compliance rate	Animals	Source
Sweden	58% and 51%	Dairy cattle	Hedman et al. 2018
Bulgaria	13%	All	Bulgarian Food Safety Agency, 2015
France	39%	Cattle	Lomellini-Dereclenne et al. 2017

Finland	25%	Pig and cattle	Väärikkälä et al. 2019
Germany	19%	All	European Court of Auditors, 2018
France	41%	All	European Court of Auditors, 2018
Italy	4%	All	European Court of Auditors, 2018
Poland	13%	All	European Court of Auditors, 2018
Romania	22%	Poultry	European Court of Auditors, 2018
UK	32%	All	FOI data from unpublished Bridgwater, Carpendale, and Springlea, 2022
Average	26.25%		

This data needs to be treated with caution. On the one hand inspections are risk based so the actual rates of non-compliance may be significantly lower than suggested by this data. Furthermore in some studies a significant cause of non-compliance is lack of paperwork, which may have limited impact on animal welfare. On the other-hand corruption may mean the rates are significantly higher than reported in some countries, for example Bulgarian vets reported to Bridgwater Carpendale, and Springlea that they were encouraged to help farmers get around the law. Additionally, where alternative data does exist it does not necessarily agree with the data here, for example a 2014 study in Italy suggests that non-compliance on organic farms is 94% ([Gambelli et al., 2014](#)) and a UK expert involved with non-profit farm investigations suggested that most farms are non-compliant. A final reason for concern with this data is that countries vary greatly in which animal welfare regulations are applicable and how data is collected.

An additional concern is that this data categorizes farms as compliant or non-compliant. This is a useful approximation but in actuality these categories may be quite vague. Some farms may be mostly compliant but break rules occasionally, for example by overstocking when there are delays getting animals to slaughter.

There are a few trends that can be identified in the data:

- **Compliance for different animals.** No clear pattern emerged from the data that suggested that non-compliance is more likely for some kinds of animals than others.
- **Compliance at different sizes of farms.** The data from Finland suggested that smaller farms are more likely to be non-compliant than larger farms (Small cattle farms 27.70%, medium cattle farms 24.90%, large cattle farms 19.80%, [Väärikkälä et al., 2019](#)). Experts we interviewed also suggested this was the case.
- **Compliance for different kinds of farming.** Certain farming methods increased the risk of non-compliance. For example, tie-stall cattle farms were more likely to be non-compliant than other cattle farms and organic farms are less likely to be non-compliant, perhaps because they are independently reviewed.
- **Severity.** The data from Bulgaria and France suggests that 10% or 20% (respectively) of non-compliance is severe non-compliance as opposed to mild or moderate non-compliance.

2.4 Routine non-compliance

In some situations it becomes standard practice not to keep to the laws. This creates an industry expectation: farmers realise that other farmers are not keeping to the law and no one is being punished and as such continue to not keep the law. For example, it is illegal to routinely tail dock pigs in the EU and UK yet 90% of EU and 84% of UK pigs are tail-docked ([Dullaghan, 2020](#)). Mass disregard will be more likely to happen where laws are vague, such as on tail docking of pigs; or where laws only need to be followed at certain times, such as preventing heat deaths of chickens ([Isaac and Dalton, 2022](#)); or where laws are hard to enforce such as in the transport of live animals for longer than legally allowed (issue flagged in an expert interview). In these cases enforcement agencies either turn a blind eye to or are unable to enforce these laws. This kind of mass non-compliance will not be captured in the above inspection data on compliance rates.

Examples on routine non-compliance are the following:

- **Tail docking.** EU law states that “no tail docking must be carried out routinely . . . [and] . . . before carrying out these procedures, other measures shall be taken to prevent tail-biting and other vices”. Farmers across the EU make token efforts to stop tail-biting without tail-docking, and then resort

to tail-docking. Across the EU over 90% of all pigs' tails are docked ([Dullaghan, 2020](#)).

- **Live transport.** Transportation laws are hard to enforce and often vague. Essere Animali report that “*transport should be able to protect animals from 'extreme temperatures' and 'conditions that expose them to 'unnecessary injury or suffering'*” however they note “*the lack of objective parameters of reference therefore creates a vast unregulated grey area*” and point out that animals are transported in vehicles that exceed 40°C ([Ceccarelli, 2022](#); [Eurogroup for Animals, 2022](#)).
- **Stocking density.**
- **Other.** Catching chickens by legs. Killing fish without stunning. Not having adequate ventilation for hot days. Etc

2.5 How bad is being on a non-compliant farm for the animals?

Mild non-compliance

Analysing the inspection data we think that mild non-compliance will affect animals in the following ways (in order of the amount of harm caused):

- Some injury risks for animals, e.g. long claws as animals not properly clipped
- Behavioural impacts or distress caused due to lack of enrichment material, social hierarchy is not considered, animals are tied up for prolonged periods
- Some instances of dirty water/feed, not enough water places for animals, some failure of mechanical feeding/watering systems
- Lighting, ventilation, temperature etc. slightly out of range

We estimate that moving an animal from a farm with mild non-compliance to a compliant farm would have a Welfare Point¹ score of 6.625.

Severe non-compliance

Analysing the inspection data we think that severe non-compliance will affect animals in the following ways (in order of the amount of harm caused):

- Hunger and thirst, pain and suffering due to inadequate quantity and quality of feeding
- Kept in cages for longer than is legal, and high levels of overstocking

¹ Welfare points are a metric created by Charity Entrepreneurship to evaluate the impact of animal welfare interventions. You can find out more about how this metric was created on [the EA forum](#) as well as an example of how we have used welfare points in the past [to compare the lifetime welfare of different animals](#).

- Ill or injured animals left without proper care
- Wet and dirty litter is common, lighting, ventilation, temperature etc. is highly out of range
- Mutilations commonly performed on animals without pain relief, and above the given age limits
- Some limited cases of inappropriate killing of animals

We estimate that moving an animal from a farm with severe non-compliance to a compliant farm would have a Welfare Point score of 14.25.

2.6 Overall view on the scale and neglectedness of the problem

Standard non-compliance

Overall, if we assume that 15% of farmed animals live in non-compliant conditions (with some amount of unnecessary injury and lack of enrichment, feed, water, temperature control) and that 15% of those animals face severe non-compliance and that the average Welfare Point score of an animal on a farm is -50, that suggests that **halving non-compliance could reduce the total suffering of animals on farms by 1.2%**. This does not include cases of routine non-compliance.

To put this in context, halving **standard non-compliance would, in an average EU country, save around 60,000,000 Welfare Points**, the equivalent to sparing 1,200,000 animals a year from lives on farms. (This is based on an average European country having about 100m animals alive at any one time, based on data from [Our World In Data](#) and [Simčikas, 2020](#)).

Routine non-compliance

There is good reason to think that some types of non-compliance are routine, affecting 80%+ of all farmed animals. It seems plausible that this could be lowered to the standard levels of non-compliance (estimated 15% of farmed animals). It is worth considering the cases of non-compliance here separately:

- **Tail docking: 25,000,000 Welfare Points** could be saved by preventing routine tail-docking in an average EU country, assuming that an average EU country has about 90% tail docking and 10 million pigs ([Dullaghan, 2020](#); [Our World in Data, 2020b](#)), where pigs live for 6 months and tail docking has a Welfare Point impact of -5.625.

- **Stocking density: Unclear. Up to 180,000,000 Welfare Points** per country are at risk (adjusting the 4.6 billion figure from [Dullaghan, 2020](#)). However it is unclear how routine the non-compliance is in this case. Data on this is uncertain as the law is vague and enforcement is poor. It maybe that this law is enforced and compliance rates are much lower, closer to 20% ([Dullaghan, 2020](#)).
- **Other: transport, cooling systems, occasional over-stocking, etc: Unclear.** These laws are all very hard to enforce so data is sparse and it is unclear.

3 Theories of change

There are a variety of options available to animal advocates to address non-compliance. The table below summarises our main options and conclusions:

Issue	Approach	Scale	Tractability	Neglectedness	Evidence	Cost-effectiveness	Overall views
Prevent routine non-compliance (e.g. tail docking, transport, stocking densities)	Legal action to prosecute non-compliance	High • 100m+ WP	Medium • Evidence it works • Lengthy/difficult	Medium-Low • Wakker Dier, L214 etc.	High • Cases of legal action helping	Medium • 17WP/\$	Strong idea
	Advocacy to improve vague laws	High • 100m+ WP	Low • Hard to change existing laws	High	Medium-low	<i>Not modelled</i>	Weak idea
	Capacity support to ensure future laws are enforceable	Medium-high • Expect high but unclear	Medium • Expect easier than other policy work	Medium-high • Eurogroup is working at EU level	Low • Reason to think has been neglected	<i>Not modelled</i>	Medium idea
Prevent standard non-compliance (e.g. increase compliance rate from 75% to 85%)	Advocacy for better policy on enforcement	Medium-high • 60m WP	Medium-low • Unclear that this can be done well	High • Only know AE UK • Scalable globally	Low • Evidence via CCTV in slaughterhouses	High • 80WP/\$ • 4WP/\$	Strong idea
	Better certification schemes	Medium-high • 60m WP	Medium-low	Medium	Medium-high	<i>Not modelled</i>	Weak idea

3.1 Legal action to prosecute routine non-compliance

About this intervention

This would involve taking companies (or government agencies) to court for not complying with (or enforcing) animal welfare law. The focus would be on routine non-compliance cases as a way of setting legal precedents and driving change.

Tractability: Medium

- **Chance of success:** Medium-high. We expect legal work to have a 60%+ chance of success. This is our best guess based on expert views and case studies listed in [Annex 2](#). However, the chance of legal work leading to large scale country-wide changes to legal precedent is significantly lower.
- **Practical ease:** Medium-low. Change is likely slower than other campaigning type work as cases can last years. There is likely a need for legal expertise in the team to carry out this kind of work.
- **Risks:** There are some risks that lost court cases could make it easier for farmers to harm animals with impunity.

Evidence: High

Note: our quality of evidence scores ranging from positive to negative and strong to inconclusive are explained in [Annex 1](#).

- **Expert views:** Positive, medium-strong. Most experts seemed weakly positive about this. One expert in policy noted this as their ideal approach. One expert said this is not neglected (especially in the US).
- **Case studies:** Positive, medium-strong. There are many examples of legal cases being successful, see [Annex 2](#). Most of these only impacted a single farm or actor but multiple cases have led to large legal countrywide changes.
- **Academic research:** Positive, weak evidence. Papers on environmental litigation suggest that such work shows weakly positive yet limited effects ([Slepcevic, 2009](#); [Vanhala, 2013](#)).

Neglectedness: Medium-low

- There are lots of cases of individual farms being taken to court but fewer groups aiming for large scale changes. Groups doing this work include Wakker Dier in the Netherlands and L214 in France.
- There are some jurisdictions where this is not possible, like most of Germany.

- We expect there to be places where this is neglected such as the UK, but it is challenging for us to identify promising campaign targets (large scale routine non-compliance which is tractable to legal challenge) without more research and legal advice.

Cost-effectiveness estimate: Medium

Based on our cost-effectiveness analysis modeling legal action to address routine non-compliance in the form of tail docking in France, this intervention looks quite cost-effective.

Policy	Total WPs affected (if campaign is successful)	Total WPs affected (expected)	WPs affected/\$
<u>Legal action to address routine non-compliance in the form of tail docking in France</u>	130,412,784	22,170,173	17.54

3.2 Policy change advocacy on enforcement

About this intervention

Policy advocacy for government policy change in ways that lead to better enforcement. For example: for CCTV in farms, more regular inspections, greater penalties for non-compliance, educating farmers, better funding for enforcement and so on.

Tractability: Medium-Low

As discussed in the evidence section, countries can enforce laws but it is not clear that any country has very good enforcement of animal welfare laws raising concerns about the tractability of these changes.

Neglectedness: Very high

There are groups that have worked on this for slaughterhouses, such as advocating for CCTV in slaughterhouses, but the only group we know of focused on this generally for farms is Animal Equality UK who are working with Animal Ask on this.

Evidence: Low

Note: our quality of evidence scores ranging from positive to negative and strong to inconclusive are explained in [Annex 1](#).

- **Cross country comparisons:** Neutral/inconclusive. Given how weak data is it is hard to highlight examples of countries that do animal welfare enforcement well (countries that do it well might appear to have lower compliance). There is evidence that tail docking rates vary from country to country across the EU ([Dullaghan, 2020](#)).
- **Animal Ask:** Negative, medium evidence. Approximately 80% of farms do not improve after being found non-compliant (Bridgwater, Carpendale, and Springlea, 2022 [Unpublished]).
- **Comparison to other areas:** Positive, medium-weak evidence. In general, enforcement tends to vary significantly from country to country and it is clear some countries can enforce laws better than others. For example see the World Justice Project's [rule of law index regulatory enforcement factor](#). This suggests that some policy makers know how to do enforcement well, and some countries should be able to make enforcement work and lower non-compliance significantly.
- **CCTV in slaughterhouses:** Positive, medium evidence. This is the clearest example of campaigners achieving a change to enforcement policy, e.g. in the UK and Israel. There are no studies of the impact of this intervention, but anecdotal reports from slaughterhouse employees and government officers "consistently indicate that CCTV cameras do deter animal welfare violations" ([Springlea, 2022](#)).

Cost-effectiveness: High

We modeled two different interventions in our cost-effectiveness analysis

Policy	Total WPs affected (if campaign is successful)	Total WPs affected (expected)	WPs affected/\$
Policy reform to increase the amount of enforcement in Germany	851,786,489	34,071,460	80.82
CCTV in farms in Scotland	33,726,433	5,058,965	4.81

3.3 Ensuring future laws are enforceable – legal and policy support for animal welfare groups

About this intervention

This could look like identifying when a government makes a commitment to change policy in some way and then providing legal support to and putting pressure on that government to ensure any legal changes are well drafted and clearly enforceable.

Tractability: **Medium**

- **Chance of success:** **Medium-high**. We expect this to be more politically tractable than other policy change work as the charity would only be working on cases where governments are already planning on making legal changes.
- **Practical ease:** **Medium-low**. This would likely involve working across many different countries and providing legal support to governments and local animal rights groups in each country. Maintaining the capability and cross-county network of lawyers and policy experts needed to do this could be a challenge for a charity but should not be an insurmountable one. This might involve working through local advocacy groups which also has its challenges.

Evidence: **Low**

Note: our quality of evidence scores ranging from positive to negative and strong to inconclusive are explained in [Annex A](#).

- **Expert view:** **Positive, weak**. One expert from Eurogroup for Animals suggested that animal welfare charities have to date been focused on trying to achieve policy change but not sufficiently focused on ensuring that change goes well. Charities are only now realising how important that part of the process is. This could explain why loopholes are so common and gives hope that it can be addressed. They also say that their work on this at the EU level is going fairly well.

Neglectedness: **Medium-high**

Eurogroup for Animals is doing significant work at the EU level to ensure that future laws are passed with sufficient detail to ensure legal enforceability. We do not know if this work is happening at more national levels.

Cost-effectiveness: Not modelled

Hard to assess future legal changes but could be very high impact.

3.4 Improving laws so they are enforceable – campaigns to close existing legal loopholes and vagueness

About this intervention

This could look like policy change work to change laws that are already in place so as to ensure they are enforceable. For example, advocacy in a country with vague tail docking laws, stocking density laws, or transport laws to add specificity and details to those laws.

Key considerations.

Overall we were not as excited about this approach. There is no strong reason to think it is more tractable to change past laws than to get new laws passed, and there would likely be some industry pushback (except for legal pressure discussed above). Evidence is weak and we did not find examples of successful advocacy campaigns (other than legal challenges) to close legal loopholes within animal welfare. There are cases of such campaigns in other areas such as successful campaigns for closing tax loopholes, but in the case of tax the government has a positive financial incentive to close the loopholes.

3.5 Certification schemes

We dismissed this idea in an earlier stage of the research and did not return to it here.

3.6 Overall views

We would be excited to see a new charity working on improving compliance through:

1. Legal action to prosecute routine non-compliance
2. Policy change advocacy on enforcement

A charity could do one or both of these interventions.

We think it could also be extremely high impact to have a charity that worked on ensuring that future laws are enforceable. However, given the practical challenges

with this intervention, it might be hard for a new organisation to break into this space without significant legal expertise, good networks and credibility. This could be an area for a charity working on compliance to expand into or for Animal Ask to expand into.

4 Expert views

We spoke to 10 experts on this topic. Experts generally agreed this was a huge problem, that laws are badly written and full of loopholes, and that enforcement is very poor. Experts suggested either:

- Working to ensure that future laws were better written with less loopholes, although they suggested that at least at the EU level this work was already happening.
- Strategic legal action to address lack of compliance or routine non-compliance, although a few experts were sceptical of the value of such work.

A summary of expert views (where we have permission to share) is in the table below:

Organisation (Name of expert)	Key points from interview
Animal Ask (George Bridgwater)	• This is a large problem. Non compliance data in the UK suggests that 25% of farms are non-compliant and data from activists going into farms suggests 100% are non-compliant (n=5). • Options are: to address loopholes and vagueness in the law; to increase chance of getting caught for non-compliance (e.g. inspections, etc); to increase penalties on farm owners (e.g. prosecutions, fines, losing licences, etc) • What is needed depends on the country. If good laws then need ways to catch non-compliance, if can catch incidents then need higher penalties on those caught. E.g. in the UK could have more inspections. In the EU it could be good to ensure the 'End the Cage Age' legislation goes well. • There is very little precedent of the movement improving compliance, so evidence is low but this is highly neglected.

Animal Equality UK (Abigail Penny) and The Animal Law Foundation (Edie Bowles)	• Investigations on UK farms show clearly illegal actions are routine. There is prolonged suffering and overcrowding, with various unlawful practices being widespread such as routine tail docking. The relevant authorities are also failing to adequately enforce the laws. • As a result, Animal Equality, following advice from law firm Advocates for Animals, is asking for the licensing of farms.
Animal Law Europe (Alice Di Concetto)	• Lack of compliance is an overstated issue. The laws are so bad that even if enforced it would make little difference, for example the legal limits on stocking density are so high that you could not farm at a higher density. Ensuring compliance needs investigation and clear evidence it is happening which is hard. • The thing that makes a difference is good legislation. Nowhere has good animal protection laws. Vague/enforceable laws are a problem and policy work with governments/EU is needed to stop this. At an EU level coordination is important and there needs to be a clear voice for the EU, so be aware that some of this work is already happening. At a local level there is a need to work with local experts to understand local laws. • There are basically no small family farms, the small ones have to contract with bigAg who then dictate how the farms are run. • Other ideas: could fight against laws that stop people from collecting evidence or improve coordination of local groups, could ensure corporate pledges are kept.
Eurogroup for Animals (Maya Cyganska)	• There is a lack of enforcement. Pig farmers in the EU routinely tail dock, castrate without anaesthetics, tooth clip, etc. Animal transport is often overloaded, overly long, etc. Prosecutions are rare. In some countries broilers are stocked to the highest 42 kg per m2 limit which was not the intention of the Broiler Directive. • The key action needed is to ensure new laws passed are clear and enforceable and not full of loopholes. Eurogroup for animals working on this at EU level. • It could be good to see work at the state level to ensure EU laws

	are complied with and legal work to prosecute non-complaint actors to ensure compliance
Wakker Dier (Angie van Dijk)	• There are open norms in EU law. For example a law says "unnecessary" but what does this mean? Regulators are reluctant to enforce open norms because of the high burden of proof.. And so there is routine non-compliance. • Wakker Dier is not familiar with other European NGO's using the law in a strategic way to improve law enforcement in the EU. There are some groups targeting specific cases on specific farms but this is probably not being done strategically to widespread changes. Angie started doing this kind of work last year in the Netherlands. Legal cases take time, , Wakker Dier has started 8 cases of which up to date two went to court (both wins).

5 Implementation

5.1 Talent

Co-founders would need to be comfortable with policy work. Depending on the option chosen they may also need legal talent.

5.2 Access to data

There is only very little data on compliance rates. This could be problematic for campaigning for this intervention and finding the best location to focus on. There is also only very limited data on what works to ensure compliance which could make it difficult for the charity to set a clear long-run vision of what success looks like and work toward it.

5.3 Opposition

Opposition from industry should be expected. It might be possible to get support from already compliant countries and farmers, as well as from the general public.

5.4 Funding

This may be a limiting factor. EA funders are less excited about the EU focus and lower priority animals. Focus on the routine non-compliance of stocking densities for broilers could be of interest, but the Better Chicken Commitment is already looking at stocking densities ([BetterChickenCommitment.com](https://betterchickencommitment.com), n.d.). That said, overall we expect this organisation would be able to find funding.

5.5 Scalability

Large opportunities for scaling: this work could be carried out across higher welfare areas like the EU, the UK and potentially the US and Oceania. That said, significant differences in legal and legislative details between countries could make scaling slow and hard.

5.6 Neglectedness

There was disagreement between experts on this. It depends somewhat on the work being done. Legal work seems less neglected in the EU and US, but may be more neglected in the UK. Policy advocacy for better enforcement is reasonably neglected everywhere.

5.7 Externalities

The main positive externality of this intervention is that if it is successful, it could set a large legal precedent. Increased compliance with animal welfare legislation may also increase the cost of animal products, which may reduce the consumption of animal products which would have positive impacts in terms of the animals no longer living a net-negative life on a factory farm. These cost impacts have two main caveats, however: 1) Increased costs could have negative effects on low-income households which should be taken into account, and 2) Increased costs of local EU or UK animal products, for example, could just lead to an increase in demand for lower-welfare, cheaper imports.

There are some risks that if not successful this could benefit farmers and harm animals, for example a failed legal case could set a precedent that it is acceptable for farmers to not comply to a particular standard.

6 Conclusion

Overall, and in comparison to the other interventions considered in this cause area, we concluded that this is not currently an idea worth recommending to charity founders.

Annex 1 – Credence rubric

We draw conclusions using the following rubric

Colour coding		Examples of this level of evidence	Approx credence in conclusion
Positives	Negatives		
Positive, strong evidence	Negative, strong evidence	Theoretical case & expert consensus, or 3+ good academic studies agree and none disagree, etc.	85%+
Positive, medium-strong evidence	Negative, medium-strong evidence	Expert consensus, or 2+ academic studies agree and none disagree, or 3+ case studies of this going well in the past, etc.	75%–85%
Positive, medium evidence	Negative, medium evidence	1–2 case studies, or 1 good academic study, or 3+ case studies of analogous areas, or strong theoretical argument, etc.	65%–75%
Positive, medium-weak evidence	Negative, medium-weak evidence	Balance of experts supports, or balance of papers support, or 1–2+ case studies of analogous areas, or weak theoretical argument, etc.	55%–65%
Positive, weak evidence	Negative, weak evidence	A poor analogy, an untrustworthy expert, an untrustworthy paper, etc.	50%–55%
Neutral/inconclusive		–	50%

Annex 2 – Examples of legal cases

USA

- On 21 November 2020, the US Court of Appeals affirmed a jury's verdict that a pig farmer was liable for both compensatory and punitive damages ([March, 2021](#); [United States Court of Appeals, 2020](#)).
- Court upholds California ban on sale of poultry that has been force-fed to produce foie gras ([Nair, 2022](#)).
- Animal welfare and public interest groups had standing to challenging pig “high-speed slaughter” rule ([Michigan State University College of Law, 2021a](#))
- Washington Supreme Court holds animal cruelty is a crime of domestic violence ([Michigan State University College of Law, 2022a](#))
- After a private complaint filed by an animal advocacy organization, Pennsylvania court reverses district attorney decision not to charge local farm for animal cruelty based on undercover investigation ([Michigan State University College of Law, 2022b](#)).

- Iowa's new "ag-gag" law ruled unconstitutional due to viewpoint discrimination of protected speech ([Michigan State University College of Law, 2022c](#)).
- In a matter of first impression, court finds dog suffered "substantial pain" under anti-cruelty law by relying on human cases ([Michigan State University College of Law, 2021b](#)).
- Court not required to return dogs to defendant whose criminal charges related to dogs were dismissed or compensate for seized dogs ([Michigan State University College of Law, 2021c](#)).
- Evidence of dogfighting including training equipment, weights, scales, and a "pit" were sufficient to sustain conviction ([Michigan State University College of Law, 2022d](#)).
- Exigent circumstances were present for a warrantless entry where there was concern over a medical emergency and subsequent entry showed the presence of 37 animals under noxious conditions ([Michigan State University College of Law, 2021d](#)).
- HSUS, PETA and other animal groups litigate under existing laws to increase protection for farm animals and had some successes in assisting prosecutors to bring criminal charges against farm employees or management ([Matheny & Leahy, 2007](#)).
- In the 1970s, a case was brought against the US FDA for not completing the review process for the use of certain antibiotics in farmed animals. The federal court judge ruled that the FDA had to complete the review process. ([GiveWell, 2013](#)).
- Many other cases listed [here](#)

UK

- In 2020, the UK Supreme Court unanimously ruled against a poultry slaughterhouse in an appeal concerning the scope of the legal duties on business operators under [Regulation 30\(1\)\(g\) the Welfare of Animals at the Time of Killing \(England\) Regulations 2015](#). The effect of this may be to leave the slaughterhouse with no defence to criminal charges ([March, 2020](#)).
- Advocates for Animals has sent a legal complaint, on behalf of Animal Equality UK, to Carmarthenshire County Council, urging it to investigate the dairy farm covered in a Panorama episode aired on 14 February ([Advocates for Animals, 2022](#)).

- During Animal Equality's undercover investigations, they witnessed a culture of violence towards the cows and neglect was also witnessed, including workers kicking and punching cows in the face and stomach, and hitting them with sharp, metal shovels. Sick and injured cows were also left to suffer. On one occasion a cow was left in excruciating pain after her unborn calf had died inside of her. Despite a veterinarian recommending prompt euthanasia, the on-site manager opted to delay action. The veterinarian was recorded saying that "this is one place where they'd rather just save the money". The cow died overnight.
- Compassion in World Farming brought the UK inspection body, DEFRA, to court for failing to properly implement and enforce Article 4 of Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes ([Dullaghan, 2020](#))

EU

The following examples were taken from Rethink Priorities report ([Dullaghan, 2020](#)):

- Wakker Dier brought the Dutch Food and Consumer Product Safety Authority (NVWA) to court in 2013 over its enforcement standards for the EU provision of food and water for broiler chickens after birth. The case was successful and from now on, the animals must be given food and water within 36 hours of hatching. They estimated this verdict improves the lives of 570 million animals per year in the Netherlands. The action took 5 years (1,000 person hours) and cost ~ 80,000 euro (a fraction of their typical campaign work on raising awareness about farm animal conditions). The risks of having to pay damages to the accused if the case is lost do not apply in that form as this was not civil but administrative Dutch/EU law.
- In 2009, PROVIEH filed a lawsuit against Germany for noncompliance with the Pig Farming Directive in the version from 2008.
- In Germany, aquaculture operators were taken to court for breaking the animal farming or animal transport law in the EU, and the judge will use non-binding fish welfare guidelines for fish farmers and for transporters to make the decision.

- Legal action by the French group L214 has only been successful in temporarily closing slaughterhouses for breaches of stunning before slaughter requirements
- Wolfgang Schindler, founder of Albert Schweitzer Foundation (ASF), was a lawyer who wrote criminal complaints for animal cruelty cases, and stood before the highest court in Germany to fight for a ban on battery cages for egg-laying hens. Schindler eventually convinced the court that such cages were unconstitutional. The German Upper House (Bundesrat) of Parliament voted on October 19, 2001 in favor of a bill to reform hen housing legislation in Germany. The vote supports the 1999 finding by Germany's highest court—the German Constitutional Court—that battery cages violate German law. The new law, expected to come into force in 2002, would ban conventional battery cages by December 31, 2006—five years earlier than the EU ban by 2012.

Other

- HSI India successfully persuaded the majority of Indian states to consider battery cages a violation of the Prevention of Cruelty to Animals Act of 1960, though subsequent enforcement has been weak ([Humane Society International, 2013](#)).
- Also in India, animal groups pursued legal action that resulted in a positive Supreme Court hearing where top litigators represented the hens' interests pro bono ([Express News Service, 2016](#)).

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