REPORT

CONSEQUENCES OF THE DRAFT EU-MERCOSUR FREE TRADE AGREEMENT ON ANIMAL AGRICULTURE

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PREFACE

This report is the result of three years of action to try to influence European and Mercosur leaders to include measures to prevent the devastating impact that this Agreement will have on animals raised for human consumption, the most affected and least protected by this type of treaty. As well as negative impact on people and the environment in Mercosur countries as a result of increased exports of food or products of animal origin to the countries of the European Union.

Each treaty that drives increased exports of animal products multiplies the suffering of millions of animals in intensive systems, depriving them of well-being and minimally dignified lives.

The actions carried out during these years included sending two letters to leaders of the European Parliament signed by representatives of dozens of civil society organisations - animal and environmental protection-, as well as animal welfare experts; meetings at the European Parliament and the European Commission, meeting with Federal Deputies on the Agreement, several attempts at meetings with Itamaraty and two face-to-face meetings with Members of the European Parliament: Yannick Jadot, Maik Aussendorf and Anna Cavazzini, in May 2023, and Thomas Waitz in August of the same year.

Despite the initiatives of Animal Equality Brazil and dozens of other organizations partners or who worked in other networks or causes, the Additional Protocol that put an end to negotiations was signed in November 2023. From then on, the expectation is that the new members of the European Parliament and the legislative powers of the Mercosur countries vote against the ratification of the Additional Protocol. This report then aims to present to these leaders and to the societies impacted by this Free Trade Agreement a perspective on the impact that it will have for animals and the environment. This report also sheds light on a blind spot of animal protection organizations: monitoring free trade agreement negotiations is essential to avoid a large-scale negative impact on animals raised for human nutrition due to the significant increase in exports. Free trade agreements are negotiated to last decades, and once ratified we are left only to deal with the consequences without anything to do.

This report is the result of a collective effort that demonstrates that intersectoral cooperation is essential to advance animal protection on a global level. I would like to thank Eurogroup for Animals for supporting our actions to include animals in this Agreement, to all Animal Equality Brazil team and the global team, our consultants Helena Lettieri and Giulia Romay and to all the organizations and professionals who were also by our side. At Animal Equality we work for a world where all animals are respected and protected. This report is another tool to ensure that business decisions do not perpetuate or deepen the exploitation and suffering of animals.

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INTRODUCTION

In 1999, the European Union (EU) and the Southern Common Market (Mercosur, comprising Argentina, Brazil, Paraguay and Uruguay) started negotiations on an Association Agreement which should include a Free Trade Agreement (FTA). Twenty years later, in 2019, they reached 'an agreement in principle', including for the FTA, which provides, among others, for the unconditional liberalisation of the trade in nearly all agrifood products, except for shelled eggs, which, to benefit from tariff liberalisation, must comply with the EU Laying Hens directive. Regrettably, there is very little trade in shelled eggs, and most of the trade happens in other animal-based products such as beef and chicken meat.

This FTA exemplifies the inconsistency of the EU's policies: its trade policy does address issues of marketing standards – there is no doubt that imported products must comply with the EU's health and safety standards, regardless of their origin – but it often remains blind to production methods, including animal welfare. And this is problematic because how products are made matters.

The FTA's possible impact on people, animals and the planet quickly became an issue. Indeed trade in farmed animal products between the EU and Mercosur is already substantial, and the additional trade would further fuel intensive animal farming in Mercosur countries, thereby impacting millions of farmed and wild animals but also having detrimental consequences for workers, indigenous communities and the environment. For all these reasons, serious concerns were raised by civil society organisations, the European Parliament and some Member States, jeopardising its ratification. To offset these negative consequences and break the political deadlock over ratification, the EU and Mercosur countries engaged in further negotiations about the sustainability aspects of the FTA. They concluded these negotiations on 6 December 2024 when they presented their so-called 'Partnership Agreement'.

The most effective tool in any FTA to ensure that the deal does not intensify abuses in animal agriculture is to condition the liberalisation of trade on the respect of EU animal welfare standards. However, **the EU–Mercosur Partnership Agreement failed to provide such a clause and instead poses serious risks of worsening conditions for animals in the industry.** Therefore the Partnership Agreement fails to address the intrinsic animal welfare and sustainability issues of the 2019 agreement. There is no guarantee of offsetting intensive animal farming: the annex to the Trade and Sustainable Development (TSD) chapter weakens the implementation of the EU Deforestation regulation, and the revised Dispute Settlement chapter opens up the possibility of Mercosur countries challenging any legitimate future EU or Member State measure that substantially impairs or nullifies any expected legitimate benefit accruing from the FTA.

This report explores the FTA under the Partnership Agreement and its foreseeable impacts on the rearing of farmed animals, demonstrating that its ratification as it stands could have detrimental effects on animal welfare, as well as negative impacts on the environment and human health. After presenting the market dynamics and the legal frameworks of both regions **(I)**, it will analyse each relevant chapter of the new Partnership Agreement, as well as relevant EU legislation **(II)**. Farming practices such as feeding systems, breeding, use of cages and mutilation are evaluated for their impact on animal welfare and sustainability **(III)**. Finally, policy recommendations for strengthening provisions on the protection of farmed animals in the FTA are presented **(IV)**.

ECONOMIC AND NORMATIVE BACKGROUND ON FARMED ANIMAL PRODUCTS IN THE CONTEXT OF THE EU AND MERCOSUR

This section provides an overview of the economic data on the existing trade between the two blocs on key farmed animal products and presents the market dynamics and underlying trade drivers between the EU and Mercosur **(A)**. Analysis of EU and domestic legislation shows that, while the EU has a comprehensive legal framework on the welfare of farmed animals – which the EU is modernising **(B) –** Mercosur countries exhibit diverse approaches with varying levels of enforcement and oversight. This difference in animal welfare frameworks could be aggravated by the unconditional trade liberalisation foreseen in the FTA **(C)**.

Data on EU–Mercosur trade relations concerning farmed animal products

When assessing the effects of trade liberalisation on the EU and Mercosur, critical economic and productive disparities between the two regions should be noted. The EU's productive output is over three times that of its South American counterpart, with a gross domestic product (GDP) per capita of €36,944, compared to an average of €11,900 among Mercosur countries, according to data from the World Bank in 2023.[1] In trade, **Mercosur primarily exports agrifood products, processed goods and commodities to the EU,** and has been **one of the EU's most important external sources of meat.** The EU in turn exports medium to high value-added products.[2] Among the four Mercosur countries,[3] Brazil stands out as a world leading producer of agrifood products (including bovine, chicken and pig meat and dairy) and is already a key exporter to the EU on bovine and chicken meat.

Currently, Mercosur countries – like any other country with no trade agreement with the EU – face duties of around 40–45% to access the European market. However, they enjoy preferential access to the EU for beef through two specific *erga omnes* tariff-rate quotas (TRQs): the Hilton Quota, which allows 46,800 tonnes of fresh meat to enter the EU with a 20% tariff; and the Hormone Free Quota, which provides duty-free access for 20,000–25,000 tonnes of meat but incentivises feedlots (*cf. Section III.A*). In 2023, the EU imported a total of 344,575 tonnes of animal-based products from Mercosur (almost 30% of total imports of animal products), worth €1.79 billion (34.7% of the total market value).[4] The main products of animal origin imported by the EU were bovine (meat and leather), other types of meat and edible offal,[5] chicken meat, and equine meat and skins.

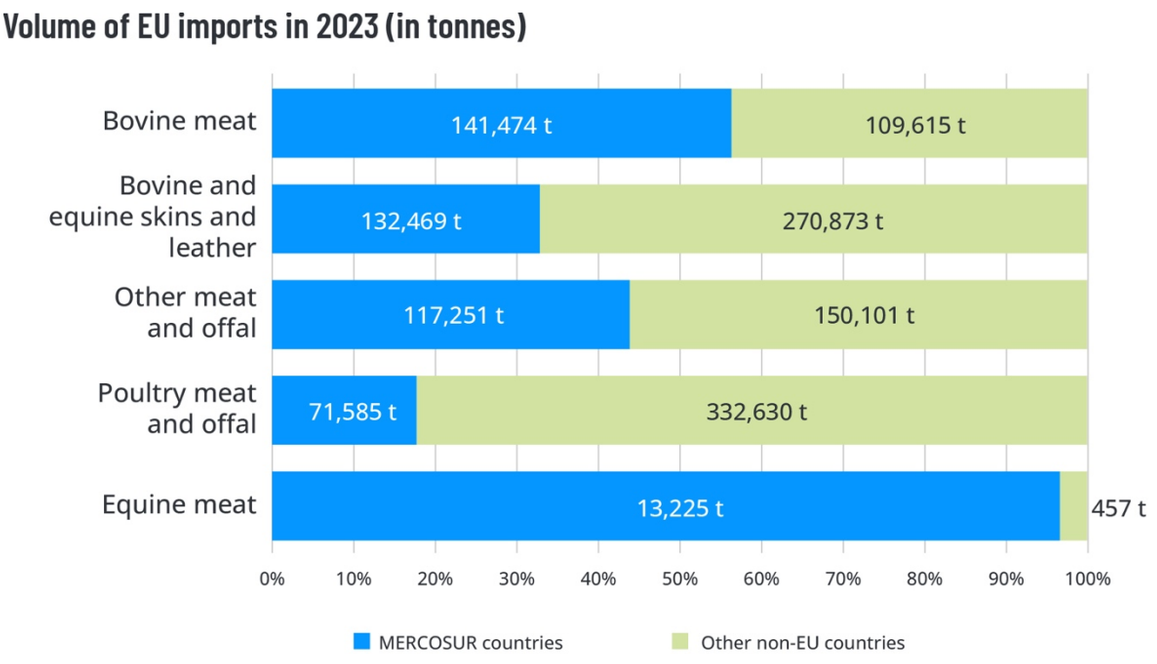


Figure 1. Volume of selected goods imported from Mercosur in relation to total volume of EU imports in 2023

*Note: * 'Other meat' includes edible offal of bovine and equine animals, pigs, sheep and goats; other meat and edible meat offal from: rabbits or hares and other hunted animals; primates; whales, dolphins and porpoises; manatees and dugongs; seals, sea lions and walruses; reptiles; camels and other camelids; domestic pigeons; reindeers; frogs' legs; fatty livers of geese or ducks; and others, including edible flours and meals of meat or meat offal (Source: EU's Access2Markets).*

Source: Access2Markets da UE

With the FTA, the EU is set to liberalise 82% of its agrifood imports without imposing any relevant animal welfare or sustainability conditions. In turn, Mercosur will liberalise over 90% of tariff lines for industrial products (such as cars, machinery, chemicals and pharmaceuticals) and 93% for agrifood products. For the remaining goods, partial liberalisation will apply, with TRQs for each type of product subject to liberalisation, including **for fresh and frozen meat (99 000 tonnes) and for chicken meat** (**180 000 tonnes).**

Three of the EU's top five providers of bovine meat (i.e. carcasses, half-carcasses and other cuts of bovine animals) in 2023 were Mercosur countries: Argentina figured in first place, with Brazil and Uruguay in third and fourth, respectively (*cf. Appendix, Table A.5*).[6] Together with Paraguay, they exported a total of 141,474 tonnes of bovine meat to the EU in 2023 (56.3% of the total import volume), worth over €1.26 billion (57% of the market value). In the same year, Europe was the fourth largest destination for Mercosur's beef production (*cf. Appendix, Table A.4*). In addition, the EU is also the main destination for Mercosur's **other meats and offal**[7] (*cf. Appendix, Table A.4*). In 2023, **Brazil alone was the biggest exporter to the EU in this sector**, with nearly 116,120 tonnes (43.4% of total import volume), worth €284.3 million (39% of the EU's market value).

With the entry into force of the FTA, a significant shift will be that **all exports under the Hilton Quota for high-quality beef will be exempt from tariffs**. Hence, beef import prices will decline, making Mercosur beef more competitive in the EU. In addition, **the combination of current and new quotas for beef will be approximately 20% larger than the current volume of Mercosur's beef exports to the EU**.

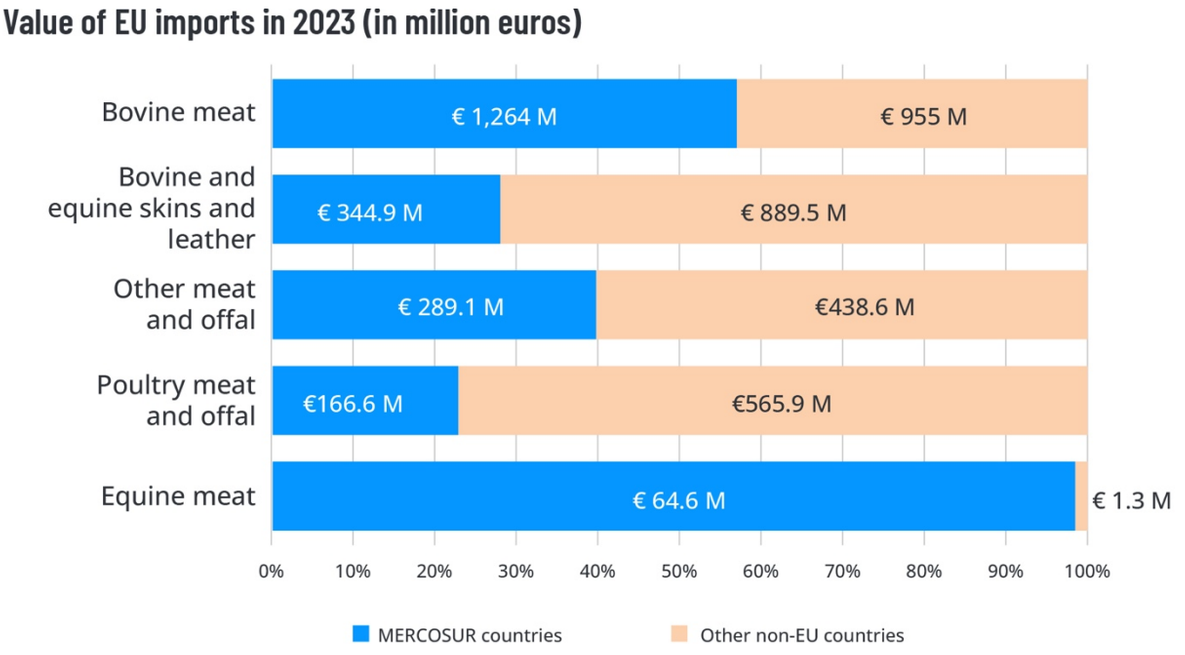


Figure 2. Value of selected goods imported from Mercosur in relation to total value of EU imports in 2023

*Note: * 'Other meat' includes edible offal of bovine and equine animals, pigs, sheep and goats; other meat and edible meat offal from: rabbits or hares and other hunted animals; primates; whales, dolphins and porpoises; manatees and dugongs; seals, sea lions and walruses; reptiles; camels and other camelids; domestic pigeons; reindeers; frogs' legs; fatty livers of geese or ducks; and others, including edible flours and meals of meat or meat offal (Source: EU's Access2Markets).*

Source: Access2Markets da UE

Concerning chicken **meat and offal (i.e. the meat and edible offal of chickens, ducks, geese, turkeys and guinea birds)**, the EU is currently a relatively small market destination for Mercosur exports, representing nearly 6% of the value of such exports (*cf. Appendix, Table A.4*). Although Brazil has been the world leader in broiler production since 2012, it primarily exports to China. However, **Brazil was the EU's second largest provider of chicken meat and offal in 2023, behind only Ukraine**, the EU's main partner in the sector (*cf. Appendix, Table A.8*). In total, Mercosur countries exported 71,585 tonnes to the EU (17.7% of total EU import volume), worth €166.6 million (nearly 23% of the market value). With the FTA, Mercosur's duty-free access to the EU market will increase by 180,000 tonnes. **The European Commission's own impact assessments showed that the FTA will lead to an increase in trade under any scenario, which will in turn lead to a probable increase in production.**

Another relevant category of imports is **equine meat (i.e. the meat of horses, asses, mules and hinnies)**. Argentina and Uruguay are already by far the largest providers of this type of meat to the EU, which is also their main export market (*cf. Appendix, Tables A.9 and A.4, respectively*). Together, they exported over 13,225 tonnes in 2023 (96.7% of total import volume), worth €64.6 million (98% of the EU's market value).

Concerning pig meat, although **Brazil is the world's fourth largest producer**, the EU market is the destination for only 0.2% of Mercosur's pig meat production.[8] Mercosur's exports of pig, sheep and goat meat to the EU are also negligible: in 2023, they amounted to 1,040 tonnes, worth €6.7 million, which was less than 0.5% of the market share in both volume and value. Nevertheless, **the FTA will grant Mercosur access to a TRQ in pig meat of 25,000 tonnes – a**

market share 25 times greater than the volume of pig, sheep and goat meat it currently exports to the EU. Although the TRQ volume is still a small fraction of the EU's overall production and consumption of pig meat, in the future it might contribute to a significant increase in production in and exports from Mercosur countries.

With regard to other animal products besides meat, **Mercosur is a significant exporter of skins and leather, with the EU market its second largest destination**. The market for bovine skins is actually nearly as big as for bovine meat (*cf. Appendix, Table A.4*). In Europe, Brazil is the largest provider of raw hides, skins (other than fur) and leather from bovine and equine animals (*cf. Appendix, Table A.7*). In 2023, the EU imported 132,469 tonnes of skins and leather from Mercosur countries (almost 33% of total import volume), worth €344.8 million (28% of the EU's market value). Furthermore, although Mercosur is not generally a key provider of animal fat to the EU, **Argentina was the second largest exporter of bovine, sheep and goat fat to the EU in 2023**, with over 2,000 tonnes (8.7% of total import volume), worth €2.4 million (9.6% of the market value) (*cf. Appendix, Table A.10*). The EU's imports of other animal-based products not previously mentioned (such as pig and chicken fat, eggs, dairy and live animals) from Mercosur countries are practically non-existent.

The increase in access to the EU market that the FTA will provide to Mercosur is expected to boost meat production in its Member States, especially in the sectors of bovine and chicken meat. Large Mercosur exporters that are eager to increase production in light of tariff reductions will be the main beneficiaries of the agreement. Therefore, **if the FTA fails to address critical issues such as animal welfare, consumer safety and sustainability, the increase in imports will have a detrimental impact on existing problems.**

EU framework regarding the welfare of farmed animals

Although EU standards on animal welfare are among the highest in the world, they were adopted over 20 years ago and are in the process of modernisation, notably to ban the use of cages in animal farming, in response to the EU's Citizens Initiative 'End the Cage Age', backed by over 1.5 million citizens. In the same vein, a 2023 special Eurobarometer survey found that **more than 84% of Europeans believe that the current levels of animal welfare protection in their respective countries should be increased**.[9] Particularly contradicting citizens' expectations, **nearly all EU regulations (except for slaughter) do not apply to imported products**. The 2023 Eurobarometer found that a vast majority of EU citizens (84%) believe that this should change, by imposing import requirements (62%) or a very strict country of origin labelling system (22%). However, it is difficult to implement a labelling system for imported animal-based products, as most of the imported food is used in food systems where this labelling does not exist (e.g. processed products, restaurants).

The EU's current standards have gradually developed into a **multi-faceted legal and policy framework that incorporates both ethical and economic considerations of animal welfare**. Central to the EU's framework is **the recognition of animals as sentient beings**, introduced by the Lisbon Treaty and formalised in Article 13 of the Treaty on the Functioning of the European Union (TFEU). This provision acknowledges the paradox of treating animals as sentient beings while allowing their use for human purposes. While not explicitly mentioned as one of the EU's fundamental values in the TFEU, secondary legal acts have **recognised animal welfare as an**

EU value that must guide policy at the international level. Within the EU's legislative competence to regulate the welfare of farmed animals (Art. 38, TFEU), legislation is mainly adopted under the Common Agricultural Policy (Art. 43)[10] or as part of the approximation of laws for internal market functioning (Arts. 26 and 114) and trade (Art. 207). Other relevant policy areas are the environment, public health and consumer policy.

The five domains of **humane treatment** were established by the adoption of the Council of Europe's European Convention for the Protection of Animals kept for Farming Purposes (Decision 1978/923/EEC). Since then, over 20 legislative acts have addressed the welfare of farmed animals. Directive 98/58/EC established **minimum standards** for the conditions under which all farmed animals (except fish, amphibians and reptiles) are kept and bred. Specific directives have further laid down minimum protective standards for laying hens (99/74/EC), chickens raised for meat production (07/43/EC), calves (08/119/EC), and pigs (08/120/EC). Other EU regulations also set standards for transport (1/2005), stunning and slaughter (EC 1099/2009), animal health (429/2016 and 2017/625) and veterinary care (2019/6). Within the last two decades, the EU's efforts have partially shifted from law-making towards improving implementation of existing standards within Member States.[11] There have also been 'soft' tools about animal welfare – for instance, in 2017 it created the **EU Animal Welfare Platform**, an initiative to bring stakeholders together and ensure better enforcement of EU rules, promote voluntary commitments, and elevate animal welfare standards in global markets.

Among all existing EU legislation on animal welfare, only **the regulation on the slaughter and stunning of farmed animals (EC 1099/2009) applies to imported goods**. With the goal of minimising animal suffering and preventing the contamination of animal products at the pre-slaughter and pre-processing stages, the regulation determines approved stunning methods, requires standardised animal welfare procedures in slaughterhouses, and mandates responsibilities for operators. Since these stages of the supply chain often take place before animal-based products arrive in the EU, **the regulation extends its application to imports by requiring third countries to comply with equivalent standards when exporting animal products to the EU**. Key measures imposed include staff training, equipment guidelines, and monitoring of stunning methods. The regulation also addresses disease control, international compliance, and industry adaptation through transitional measures.

At the international level, the EU has in place nearly 40 trade, economic partnership and association agreements with third parties and five FTAs (with New Zealand,[12] Ukraine,[13] Singapore,[14] South Korea[15] and Vietnam),[16] which frequently liberalise trade in animal products without any animal welfare conditions – except for the EU–New Zealand deal, which conditions trade in beef on the exclusion of feedlots. This is a missed opportunity given the EU's prominence in the global market and its standing on animal welfare. **The EU could potentially engage trade partners to adopt European standards or their equivalents as a condition for liberalising its market – akin to the measures it has adopted concerning slaughter standards.**

Most EU trade agreements refer to the general exception provided by Article XX of the General Agreement on Tariffs and Trade (GATT)[17] or replicate it within their text. This provision confers an exception to the rules on national treatment and market access for foreign animal-based products, with the potential to justify import prohibition of products originated from animal cruelty. Nearly all agreements also add references to the World Organisation for Animal Health (OIE) animal health standards[18] in their sanitary and phytosanitary measures (SPS) chapters.

Since the start of the 21st century, the EU has consistently included animal welfare clauses in the new generation of trade agreements. The first of these new-generation agreements was concluded with Chile in 2002. It set a precedent by having improved regulation and institutionalisation of animal welfare concerns within Chile's domestic system, particularly in the livestock sector. Since then, **more than 10 agreements have incorporated provisions for the exchange of information, dialogue, consultation, cooperation, collaboration and technical assistance on animal welfare and related issues**.[19] Another distinct feature of the agreements with Eastern European partners is the legal approximation of animal welfare standards on stunning and slaughter, transport and farming of animals.[20] This can be explained by the strong interconnection between the EU and its neighbouring countries.

More recently, the EU–New Zealand FTA which entered into force in May 2024, marked a new milestone, **becoming the first trade agreement in force to condition market access on adherence to animal welfare standards** (cf. Chapters 8 and 9).[21] It includes a chapter on sustainable food systems and animal welfare, with Art. 8.2(2) establishing the recognition that "[both parties'] respective animal welfare standards and associated systems provide comparable animal welfare outcomes".[22] It also underscores cooperation on animal welfare, and commits to initiatives aimed at harmonising national and regional standards and, more specifically, phasing out the use of antimicrobial agents as growth promoters – by reducing their use in animal production and addressing food loss, waste, pesticides, fertilisers and food supply chain resilience. **In contrast, the EU–Mercosur FTA only encompasses minimal, inconsequential and often non-enforceable provisions on animal welfare** (*cf. Section II.A for further details*).

Mercosur countries' frameworks regarding the welfare of farmed animals

Mercosur has adopted over 30 policies in the agriculture sector, among decisions and recommendations from the Common Market Council and resolutions from the Common Market Group. However, the norms concerning the rearing of animals focus mainly on production quality and trade-related measures, encompassing issues such as public health, sanitary requirements, food safety and veterinary medication practices. With no legislation on animal welfare at regional level, it is left entirely to the discretion of Member States, with significant variation between them.

Brazil

Brazil's regulatory framework concerning farmed animals shows a strong emphasis on agricultural productivity and food safety, with some recent attempts to improve animal welfare conditions. **However, comprehensive welfare reforms remain limited.** The Brazilian Federal Constitution of 1988 has general provisions against animal cruelty, and Federal Law 9.605/1998 explicitly prohibits animal mistreatment. They are complemented by specific regulations on agricultural policies and animal production, such as Federal Law 8.171/1991, which, however, lack detailed welfare provisions.

A series of normative instructions issued by the Ministry of Agriculture and Livestock attempt to address animal welfare. Normative Instruction 56/2008 provides general recommendations for farmed animals, and Normative Instruction 113/2020 establishes minimum

standards for pig protection, also **setting the deadline of 2045 to end cages in the pig meat production sector**. Normative Instructions 110/2020 and 40/2020 regulate the ingredients used in animal feed. Several regulations also concern the use of antibiotics and hormones in veterinary practices, such as Normative Instructions 54/2018, 45/2016 and 55/2011, which regulate the rearing of bovine animals and chicken. Decree 365/2021 sets out technical guidelines for 'humane slaughter', but it normalises the killing of pregnant animals after the third quarter of pregnancy.

However, many practices cruel to animals that are banned or rarely used in the EU are common in Brazil, such as the use of battery cages and gestation crates and the transport of live animals.

Further, the country faces problems with compliance with its current legislation, and this trend will likely worsen with **Federal Law 14.515/2022 enabling private monitoring of animal agriculture and ending mandatory government inspections at slaughterhouses**. With this legislation in force, ensuring the adoption of best practices and adherence to current legislation will pose greater challenges. Although this 'self-control bill' does not apply to slaughterhouses exporting to the EU, audits by the EU's Directorate for Health and Food Safety[23] in slaughterhouses exporting beef to the EU revealed ongoing issues with animal welfare practices. These audits take place because EU-equivalent standards at the time of slaughter apply to third countries exporting to the EU. The audits found the use of inappropriate stunning equipment and restraining devices, overly long stunning times and differing feeding rules.[24] The most recent audit on Brazil, from 2018, highlighted that **existing regulation does not guarantee the swift removal of non-compliant facilities from the list of permitted exporters to the EU**.

On the other hand, there also are **legal improvements under way, which could benefit from the political momentum of the entry into force of the FTA, if animal welfare becomes a priority for parties**. Recent legislative proposals aiming to enhance animal welfare conditions include: (i) Bill 49/2019 on humane slaughter; (ii) Bill 90/2020 on the prohibition of the production and consumption of products made with forced feed; (iii) Bill 3867/2021 on a mandatory tracking system for animal welfare and environmental violations; (iv) Bill 3093/2021 to forbid the live transport of exports; (v) Bill 2.387/2022 to ban equine slaughterhouses; (vi) Bill 783/2024 to forbid the culling of male chicks; (vii) Bill 783/2024 on including transparency about mandatory labour in products made with animal protein; and (viii) Bill 5092/2023 on the prohibition of the use of cages and extreme confinement for animals raised for human consumption.

Argentina

Despite having an array of legislative measures, Argentina's approach to animal welfare remains fragmented, with many critical areas under-regulated or ignored. **The lack of a comprehensive and unified national strategy leaves much room for criticism of the treatment of farmed animals in the country.** The earliest piece of legislation on animal welfare was Law 14346/1954, which prohibits mistreatment and cruelty towards animals in general. However, its broad provisions lack specificity for addressing the rearing of farmed animals. Later, Law 18819/1970, which banned the use of mallets for stunning animals during slaughter, represented another step forward. Not until the 2000s were additional regulations introduced.

Decree 206/2001 created the National Organic Production Programme, addressing animal welfare in the context of organic farming. **More recent improvements** include resolutions

banning force-feeding of ducks and geese (413/2003), restricting the use of electric prods (25/2013) and regulating the animal welfare of chicken raised for meat (575/2018). The National Registry of Feedlot Livestock Establishments (329/2017) and the National Committees for Animal Health and Welfare (542/2021) establish oversight mechanisms but do not introduce substantive provisions. Similarly, recent regulations regarding the transport (503/2022) and handling (1697/2019) of live animals in livestock gathering sites (827/2023) have done little to address welfare.

Finally, Resolution 893/2018, which regulates slaughter of equine animals, raises concerns, as it seems to focus on formalising the practice rather than addressing welfare. A recent audit carried out in Argentina and Uruguay by the European Commission **found** that **"compliance with EU veterinary medical treatments and residency requirements is significantly compromised" in the sector of equine meat.** It concluded that guarantees regarding EU food safety requirements are "insufficiently reliable and, on some occasions false".[25]

Uruguay

Uruguay's legislation is a patchwork of laws and decrees with varying focuses, reflecting greater emphasis on public health and food safety than on comprehensive welfare protections for farmed animals. However, some pieces of legislation represent significant advancements. **Some Uruguayan regulations incorporate EU animal welfare standards**, such as Resolution 152/2012, which mirrors the provisions on animal slaughter from Council Directive 1099/2009/EC. Moreover, both Argentina and Uruguay have participated in initiatives such as the OIE's Regional Animal Welfare Strategy for the Americas, introduced in 2012. This demonstrates concern with aligning their as yet insufficient domestic framework with international standards and practices.

The first norm adopted was the Animal Health Policy (Law 3606/1911), which focused on safeguarding livestock production by preventing the introduction of exotic diseases. The updated general framework currently in force derives from Law 18.471/2009, which addresses the protection, welfare and ownership of animals in general, with some provisions related to farmed animals. Additional norms further regulate specific topics. Decrees 160/1997, 63/2002 and 177/2004 implemented **strict controls on veterinary use of antimicrobial active ingredients and antibiotics in bovine rearing**, and Decree 098/2011 **prohibited the use of antibiotics as growth promoters**. The National Plan of Antimicrobial Resistance Contention from 2018 underscores the country's focus on controlling antimicrobial resistance within the animal health and food production sectors. Finally, Decrees 90/1995 and 382/2016 set minimum standards for milk production, and Decree 195/2018 established a control system for bird slaughter.

Paraguay

Paraguay's legislation on animal welfare is insufficient. It comprises only the General Animal Protection and Welfare Law (4840/2013) with general protection clauses and gaps in enforcement measures, and does not differentiate between domesticated animals and animals raised for other purposes, thus it lacks the specificity needed to address issues affecting farmed animals.

CONTENT OF THE EU–MERCOSUR FTA CONCERNING FARMED ANIMAL PRODUCTS AND ANIMAL WELFARE

On 29 June 2019, the EU and Mercosur concluded negotiations for trade components of the agreement. This was complemented in July 2020 by the conclusion of negotiations for the political and cooperation components of the deal. On 6 December 2024, the EU and Mercosur reached political agreement on an "improved EU–Mercosur Partnership Agreement".

This new Partnership Agreement does not substantially change the economic balance of the agreement reached in 2019 and 2020. There are, however, some new provisions to the sustainability related chapters of the FTA, but these new provisions still fail to address the intrinsic issues of the FTA. More worryingly, the Partnership Agreement introduces an additional tool for partners to challenge each other's legislation through the so-called "rebalancing mechanism".

What is the so-called "rebalancing mechanism" presented in the new Partnership Agreement ?

The so-called 'rebalancing mechanism' included in the dispute settlement chapter provides for an additional avenue to challenge any future measure (*e.g.* legislation) that nullifies or substantially impairs legitimate expected benefits under the agreement.

This mechanism is different from other dispute settlements because it applies to measures that do not need to be inconsistent or in violation of the agreement. That's why in WTO terms it's referred to as "non-violation claims". **Measures that are justified and have legitimate policy goals can be challenged without questioning the legality or the legitimacy of such measures** provided they are not "reasonably anticipated".

What are the risks of this mechanism ?

The mechanism introduces an additional avenue for challenges that can make decision-makers hesitate about presenting the measure in the first place. Furthermore, even if the mechanism sets a number of strict conditions for the challenge to succeed, the risk in this FTA lies with the uncertainties of its regime.

Why is the "non violation" claim in the FTA more risky than the one in the WTO ?

The GATT and WTO panels have developed a restrictive interpretation of "non-violation" complaints, stressing that such remedies should remain "exceptional", particularly for

measures pursuing legitimate policy goals. At the WTO it's difficult that a non-violation succeeds, especially given the requirement that the challenged measures must have been unforeseeable.

But the strict approach of the WTO could not apply in a dispute settlement under the EU-Mercosur Agreement for two reasons:

- The late inclusion of the "rebalancing mechanism" could be interpreted by a panel as a means of counteracting the adverse consequences of environmental or sustainability regulations. Thereby **diminishing the foreseeability requirement** of the measure. This can impact measures in force but noy yet implemented at the time of the negotiation.

- If the measure requiring compliance or equivalence with production standards leads to a degree of impairment, this **may increase the risk that a panel deems the measures unforeseeable**, thereby strengthening the complainant's case.

Animal welfare provisions

The agreement recognises that animals are sentient beings (Dialogues, Art. 3),[26] but **it does not condition trade preferences on relevant animal welfare standards**. It liberalises trade in products derived from animals without imposing any animal welfare conditions, which means that intensive farms in Mercosur countries exporting to the EU do not need to comply with EU standards to benefit from the tariff liberalisation. This loophole could allow the entry into Europe of animal products that do not meet EU animal welfare standards. **European citizens would be consuming imported goods produced with lower standards, even though nearly 9 out of 10 Europeans agree that agricultural imports of any origin should only enter the EU if their production complies with EU environmental, animal welfare and labour standards.**

The only animal welfare condition specified in the agreement stipulates that EU standards must apply to preferential imports of shelled eggs from Mercosur (Annex 2-A, Art. 5(l)).[27] Despite setting an important precedent,[28] **this condition is rather inconsequential**, since shelled eggs from Mercosur represent less than 0.04% of the volume (18.26 tonnes) of EU imports in the sector, and less than 0.3% of the market value (€317,141). The negligible level of trade in this product is probably why the condition was included in the first place.

The only other provision concerning animal welfare is found in **Dialogues**, **Art. 6**, which is non-enforceable, outlining bilateral and international cooperation through exchange of scientific information, and the 2024 texts do not add anything new on cooperation on animal welfare. **While beneficial, this cooperation is insufficient to ensure that exporting countries will engage to improve their standards.** As this provision is non-enforceable, unless parties have real political and financial resources, it is unlikely to have real impacts on how animals are treated at establishments in Mercosur.

The non-enforcement of 'soft' provisions was exemplified in the EU–Korea FTA, where a panel ruled that failure to implement aspirational TSD commitments contained in trade agreements does not mean failure to comply with the FTA, as these commitments were considered 'obligations of effort' rather than 'obligations of result'.[29] This enforces the claim that TSD chapters need to have strong language.

The FTA further specifies that the efforts conducted by its working groups "will not endanger the independence of their respective national or regional agencies" (Dialogues, Art. 7.1) and preserves each country's right to regulate. This means that, despite the potential for positive exchanges of information, **any changes to domestic regulations aimed at strengthening animal welfare standards will be purely voluntary and cannot offset the negative consequences of unconditional trade**.

Sanitary and phytosanitary measures

The SPS chapter[30] of the agreement establishes mechanisms to ensure the safety of consumers against imported goods. **Although the European Commission argues that EU SPS standards will not be relaxed, the SPS chapter creates some uncertainty regarding this objective.[31]** This could, in fact, pose significant safety risks to EU consumers, particularly with regard to animal-based products, as the application of the precautionary principle – on which several key import requirements are based – could be at risk.

By referring only to the World Trade Organization (WTO) SPS agreement, the SPS chapter will be insufficient for the EU to defend its policymaking based on the precautionary principle. For example, the ban on using chlorine – or any other non-approved chemicals – to wash chicken meat and the ban on certain growth promoters were both based on the precautionary principle. Both measures have been challenged at the WTO: while the dispute on chlorinated chicken did not proceed, the EU ended up compensating partners for its ban on growth promoters. Furthermore, Mercosur countries, as well as other EU trading partners, have been challenging the EU's approach on instances such as pesticides and residues. They were signatories to a letter published during the latest WTO ministerial meeting attacking the regulatory barriers imposed by the EU, claiming this is having "substantial negative impact on the production of, and trade in, safe food and agricultural products", while calling for "greater harmonization",[32] thus showcasing their position against the strict rules applied by the EU.

Article 6.1 of the SPS chapter explicitly requires exported products to comply with the SPS requirements within the chapter; **however, it does not include sufficient monitoring mechanisms to verify whether they are met in practice**.

Article 7-A of the SPS chapter outlines trade facilitation measures, stipulating that approvals for the import of animals, animal products, products of animal origin, and animal by-products **shall be granted without prior inspection of individual establishments by the importing country**. Hence, the approval of the exporting establishment is the default procedure, rather than a privilege granted only to establishments that pass a thorough inspection. This 'automatic' approval will be granted once the importing country recognises the official control system of the exporting country upon sufficient guarantee that it complies with sanitary

requirements. However, **this provision does not define what constitutes 'sufficient guarantees' and places the burden of proof on the exporting country**.

Additionally, **Article 6 of the Dialogues chapter** regulates the exchange of information on scientific matters related to food safety, and animal and plant health.[33] However, **the implementation of eventual modifications in Member States is voluntary**. Therefore, **countries with stricter regulations could become subjected to pressure to become more flexible from certain economic sectors**. By granting almost automatic approval to establishments even before any inspections are conducted, these provisions challenge effective application of the precautionary principle **usually applied by EU standards**, which is often regarded as an illegitimate barrier to trade.[34]

The agreement and its approval mechanism do not support the use of preventive measures to block the import of products suspected of non-compliance with the regulations of importing countries. **To maintain import safety, the general rule should be to apply the precautionary principle initially and grant export approval only after thorough inspections confirm that the establishment complies with the importing country's SPS regulation.** It permits the simplification of control and monitoring mechanisms and reduces the frequency of import checks conducted by importing countries (Article 7-B.2, SPS). The FTA also relies heavily on international guidelines that are frequently weaker than national standards. This could increase the risk of non-compliance with the importing country's standards, potentially jeopardising consumer safety and health.

Therefore, **the agreement weakens food safety control by allowing for rapid pre-approval of imports**, reducing the frequency and effectiveness of checks by the importing countries, and limiting their authority to block imports in case of suspected violations. To maintain import safety, **the general rule should be to apply the precautionary principle initially and grant export approvals only after thorough inspections confirm that exporting establishments comply with the importing country's SPS regulations**.

Antimicrobial resistance

As a significant global health threat, antimicrobial resistance jeopardises many advancements made in reducing infectious diseases. It happens when bacteria, viruses, fungi and parasites adapt, rendering medicines such as antibiotics ineffective, leading to more difficult infections and increasing illness and death rates. The World Health Organization (WHO) Global Research on Antimicrobial Resistance project indicated that, in 2019 alone, antimicrobial resistance caused 1.27 million deaths globally,[35] and could lead to a $3.4 trillion annual loss in GDP by the end of the decade. Over 70% of antibiotic agents are used to treat and prevent diseases in animals raised for food,[36] particularly in countries with poor regulatory oversight and data collection on the use of antibiotics.

The FTA encourages the exchange of information on best practices for the use of antibiotics in farming, and promotes collaboration between countries to *"follow up existing and future guidelines, standards, recommendations and actions (...) aiming to promote the prudent and responsible use of antibiotics and relating to animal production and veterinary practices"* (Dialogues, Art. 5).[37] Similarly to what happens with animal welfare, **this provision is non-enforceable and does not necessarily mean any improvement in the control of the use of antibiotics or compliance with importing countries' regulations, because the article uses non-committal**

language that imposes an obligation merely 'of effort'. Therefore, there is no effective obligation to exchange information, nor any guarantee that any information eventually exchanged will be used to promote better practice in the use of antibiotics. Moreover, the language in the EU-Mercosur FTA seems outdated compared to recent EU FTAs, for example the modernised EU-Chile FTA where there is dedicated article on antimicrobial resistance and a commitment from each party to *"phase out the use of antimicrobial medicinal products as growth promoters".*

The Veterinary Medicinal Products Regulation falls short to fight antimicrobial resistance

The Veterinary Medicinal Products Regulation (EU) 2019/6) sets an important step in the fight against antimicrobial resistance. In its article 107 it phases out antimicrobial medicines *"in animals for the purpose of promoting growth nor to increase yield".*

Crucially, this obligation to phase out antimicrobial medicines as growth promoters will also apply to operators in third countries for animals or products of animal origin exported from such third countries to the EU.

However, the regulation has some concerning loopholes:

- The scope of "medicines" leaves out problematic uses of the products. It only applies to antibiotics classified as medicines and not as additives. As a result, it covers only a small fraction of the uses by producers in third countries that export their animal products to the EU. In addition, certain medicines widely used in animal production systems are left out, such as coccidiostats which include ionophores.

- The date of implementation is uncertain. The regulation requires several implementing acts and some of them are still missing and as of February 2025 there is no clear timeline concerning their publication.

- The effective implementation of the prohibition to use certain antimicrobials as growth promoters will be dependent on sufficient resources to ensure its enforcement. EU food safety and health standards are already applicable to imports, yet recent audits from DG SANTE in Brazil showed shortcomings about beef products produced with hormones and for controlling avian influenza.

Trade and sustainable development

The agreement includes a chapter dedicated to TSD,[38] in which the Parties commit to maintaining labour and environmental standards without lowering them to attract trade and investment. They also agree to uphold multilateral environmental agreements, such as the CITES Convention on Wildlife Trade and the Paris Agreement. While it includes more

sustainable commitments than previous FTAs, **the TSD chapter still lacks enforceability and concrete actions for countries to follow**. Additionally, Article 2 of the TSD chapter acknowledges each State's right to set its own levels of domestic environmental and labour protection, as long as it does not weaken current levels of protection to encourage trade or investment. However, failing to adhere to them does not constitute a sanctionable offence in light of the agreement.

Although there is a specific dispute settlement procedure for violations of TSD provisions, the main issue with this chapter remains the **non-enforceable clauses and the lack of concrete actions required from Parties.** Finally, **the absence of provisions that condition tariff liberalisation on compliance with sustainability measures and other international obligations is a missed opportunity**, since the intensification of trade resulting from the implementation of the FTA will escalate existing environmental and animal welfare problems and have a negative impact on sustainable development. The fact that the EU's new approach to TSD chapters will not apply to this specific FTA represents another missed opportunity to promote sustainable practices.

Annex to the TSD chapter weakens the EU Deforestation regulation

The EU Deforestation Regulation (EUDR) aims to reduce the environmental and social impacts of the EU's consumption by ensuring that products like beef, palm oil, and soy are deforestation-free. However, provisions in the annex to the TSD chapter could significantly weaken its implementation.

Key concerns include:

- **Mercosur Influence on EUDR enforcement:** The new agreement allows Mercosur authorities to influence EUDR enforcement by requiring EU authorities to rely on information from Mercosur countries rather than independent due diligence.
- **Lower Risk Rating for Mercosur countries**: The agreement suggests that Mercosur countries could receive a favorable rating under the EUDR country benchmarking system, potentially reducing oversight and due diligence requirements.
- **Certification Scheme Reliance:** EU authorities may be required to accept Mercosur-approved certification schemes for compliance, contradicting the EUDR's original intent, which does not accept certification alone as proof of compliance.

This section demonstrated that the agreement lacks several provisions that could enforce higher standards for animal products entering the EU. **There are no minimal standards or conditions requiring Mercosur countries to comply with the EU's regulations regarding animal welfare for products they are exporting to the EU,** except for shelled eggs, which represent an insignificant share of trade. Including such provisions is essential to ensure adequate accountability when products fail to meet minimum standards, and to ensure that all products are

subject to the same requirements. Additionally, the application of the same requirements is highly beneficial to consumers, who do not want to be offered low-welfare products, and further encourages EU and Mercosur countries to develop new animal welfare legislation. **Non-compliance with stricter regulations could potentially cause more harm to the environment, animals and consumer health than if the agreement were not implemented.**

Trade agreements are made to last for decades, and the EU–Mercosur Partnership Agreement fails the test to be bulletproof in a political landscape that has been shown to pose challenges in some Mercosur countries. In 2019, former Brazilian president Jair Bolsonaro posed serious threats to the development of environmental and social policies in the country.[39] Similarly, the election of Argentinian president Javier Milei in 2023 – a recognised climate change denier – also poses challenges to the development of green agendas. Given this potential political instability in some Mercosur countries, but also in the EU, **the agreement, once ratified, must be resilient enough to withstand shifts in government over decades and avoid policy setbacks**.

POTENTIAL IMPACTS OF THE FTA ON THE WELFARE OF FARMED ANIMALS: SELECTED TOPICS

This section addresses the possible impacts of the FTA's weak provisions in Mercosur countries on specific practices adopted in animal rearing **(A)** and on public health issues such as environmental preservation **(B)**, antimicrobial resistance and food safety **(C)**.

Animal health and animal welfare

Around 9 out of 10 Europeans believe that farming and breeding practices must meet ethical criteria.[40] According to the European Food Safety Authority (EFSA), the factors that affect animals' health and welfare include their physical environment, available resources, and management practices they are subjected to, such as breeding, mutilation, and the use of cages, crates and feedlots.[41] Even though the FTA includes a condition that EU standards must apply to preferential imports of shelled eggs from Mercosur, this is insufficient to ensure desirable welfare standards for all animals that will be affected by this agreement.

Fast-growing breeds

If the FTA is approved without specific provisions regarding the welfare of chickens raised for meat, an increasing number of derived products entering the EU market from Mercosur, particularly Brazil, will not meet the expectations that have been increasingly raised by European consumers and an increasing number of animals raised for export in Mercosur countries will be exposed to the problems caused by rapid growth.

Chickens raised for meat have a very short lifespan, reaching their final slaughter weight of 1.5–2 kg in approximately 40 days. During this brief period, they undergo rapid and unnatural growth, which leads to numerous health issues. Due to their breeding for excessive breast tissue, many chickens struggle to balance properly. They frequently suffer from cardiovascular problems, enlarged hearts, painful lameness, leg disorders, and conditions such as ascites, often within just a few weeks of life.[42]

The EU's legal framework sets minimum standards for the welfare of these chickens, with Directive 2007/43/EC specifically aiming to control the typical overcrowded conditions of industrial farming. However, a 2017 study by the European Commission revealed that 10 years after its implementation, it was still unclear how effectively the Directive had improved the welfare of chickens. The study noted that variations in how it was applied across different EU Member States may have hindered the assessment of its true impact.[43] The Directive also lacks provisions that could significantly improve the quality of life for chickens, as it does not address health problems caused by selection for rapid growth, nor does it tackle welfare risks for chickens raised for meat. However, **the EU is expected to adopt reforms to its legislative framework concerning the welfare of chickens in the coming years**, including a ban on fast growing breeds.

In 2023, Denmark took a pioneering step by announcing a landmark agreement to improve the treatment of meat chickens. The country, already at the forefront of chicken welfare, is home

to many food companies that have committed to the Better Chicken Commitment (BCC),[44] which promotes healthier breeds and better living conditions for chickens. **The Danish government's new public procurement agreement mandates that it will no longer purchase or serve meat from unhealthy, fast-growing breeds –** breeds that are genetically predisposed to suffer – **in public kitchens**. Additionally, **Denmark plans to advocate for an EU-wide ban on these breeds, launching a government-funded campaign to educate the public on the importance of allowing chickens to grow more slowly and naturally**. New standards could also be based on the European Chicken Commitment,[45] the original statement of principles and standards for improving chicken welfare outlined by major animal welfare organisations across Europe, which incentivised the implementation of the BCC and is already supported by over 570 companies worldwide. In contrast, countries such as Brazil and Argentina, which are major chicken meat suppliers, have no comparable legislation to ensure even basic welfare standards during the animals' upbringing.

Intensive animal farming: Feedlots

While extensive cattle farming has a significant environmental impact due to the deforestation required for large areas of pasture, the alternative method represents significant concerns to the welfare of animals. **In Mercosur countries, possibly because of the wider availability of land, grass-fed systems are typically more common than feedlots. However, as beef production increases and deforestation becomes a more pressing issue, feedlots are becoming more attractive to producers.**[46] The EU's *erga omnes* Hormone Free Quota particularly incentivises this method of production. By presenting requirements which impose a diet mostly based on grains on animals raised for meat, the tariff implicitly imposes the use of feedlots.

Feedlots are confined areas used to enhance productivity where cattle are kept in close quarters and fed a high-energy diet before slaughter.[47] In some systems, cattle are initially raised on pasture and then moved to feedlots prior to slaughter. **In Brazil, about 23.7% of cows slaughtered in 2021 came from feedlot systems, compared to 12.6% in 2016.**[48] With the expected rise in beef production driven by the EU–Mercosur FTA, along with increasing grain prices and land shortages in many areas, this percentage is likely to grow further to sustain or boost production levels.[49]

The pressure to decrease deforestation has led the Brazilian Ministry of Agriculture to create the ABC Plan for sustainable agriculture, of which one of the main goals is to increase the number of cows raised in feedlots.[50]

Feedlot systems come with significant costs to animals, as they are associated with various health and welfare problems for cattle.Cattle in feedlots are more susceptible to bovine respiratory disease (BRD), which is the leading cause of death in these environments, accounting for 84% of illnesses.[51] Feedlot conditions such as exposure to dust and high animal density create an environment conducive to the spread of viral and bacterial infections.[52] Additionally, stress from overcrowding, unsanitary conditions and limited space – along with the inability to exhibit natural behaviours – further exacerbates animal health issues. Workers on beef feedlots also face significant health risks. They are more prone to respiratory diseases, including pneumonia, due to their working conditions. For instance, the ammonia released in feedlots contributes to the formation of fine particulate matter (PM2.5), which is highly detrimental to human health.

Other health hazards prevalent in feedlots include **digestive problems resulting from grain overload**. Cattle are naturally adapted to a diet of roughage from grass, but feedlot diets are grain-based, which differs significantly from their natural diet. This shift causes numerous digestive issues, contributing to about a quarter of cattle mortality in feedlots.[53] According to the OIE, "as the proportion of grain increases in the diet, the relative risk of digestive upset in cattle increases", potentially leading to symptoms such as acidosis, bloat, liver abscesses, diarrhoea, dehydration and various metabolic disorders.[54] According to an EU Scientific Committee on Animal Health and Animal Welfare, around 14–42% of the mortality in intensive beef production systems is related to metabolic disorders.[55]

Due to the high prevalence of diseases in feedlot environments, **producers often administer large volumes of antibiotics, as either prophylactic (preventive) or therapeutic treatments**. While EU regulation on veterinary medicines restricts the use of antimicrobials in farmed animals, these regulations do not fully extend to imported products.[56] Consequently, although there are legitimate medical reasons for using antibiotics due to the elevated disease risk in feedlots, producers can still administer substantial doses of antibiotics while technically adhering to EU importation standards, because of the loopholes within the VetMed regulation.[57]

Finally, **the presence of mud and dust in feedlot environments exacerbates several problems**. Mud impedes cattle movement and resting, contributing to overall stress and discomfort. It can also increase the risk of contamination, as only 25% of cattle finished in feedlots arrive clean at slaughterhouses,[58] posing a threat to public health. Confinement in feedlots also **subjects cattle to significant stress from both heat and cold**. Heat stress is exacerbated by factors such as the lack of shade in some outdoor feedlots and the increased weight, which impairs their ability to cool themselves. Additionally, **the accumulation of fat from grain-based diets reduces their ability to regulate body heat effectively**.

Therefore, **feedlot systems are detrimental in principle to cattle mental and physical health, not to say extremely cruel**.

Use of cages and density for laying hens

The use of cages in animal production industries presents significant challenges. Cage systems present animal welfare issues, as they severely restrict the animals' movements and prevent them from engaging in natural behaviours. In all EU Member States, at least 80% of citizens believe it is important to ensure animals are not kept in individual cages to meet ethical responsibilities.[59]

However, the FTA only includes an animal welfare condition for the import of shelled eggs, leaving the regulation for other egg products unclear, and potentially allowing the import of egg products from animals kept in battery cages. In any case, the trade in shelled eggs and egg products between the two regional blocs is minimal.

In Europe, the 'End the Cage Age' initiative calls on the European Commission to propose legislation to prohibit the use of cages for farmed animals, such as laying hens, chicken raised for meat, rabbits and others. The petition gathered over 1.5 million signatures from supporters, showing the engagement of the European population towards better conditions for farm animals. The European Commission positively accepted this initiative, and should put forward by 2026 the

first proposals on a modernised animal welfare legislation, including the ban on cages for animal farming.

Confinement restricts animals from performing comfort behaviours such as foraging, dust bathing and nesting, leading to significant frustration and increased stress, which contributes to higher incidences of metabolic diseases,[60] high rates of disuse osteoporosis and overall poor welfare outcomes.[61] Limited movement prevents animals from engaging in natural behaviours and negatively affects skeletal development, affecting both their behavioural and physical health. Cage systems are also associated with poorer bone strength, leading to higher rates of injuries and fractures.[62] A scientific opinion issued by the EFSA Panel on Animal Health and Animal Welfare identified key concerns in caged systems, recommending housing laying hens and layer breeders in non-cage systems to better address these welfare issues.[63] Most researchers suggest that replacing battery cages with cage-free systems improves animal welfare.

In Brazil, 95% of egg production comes from intensive systems using conventional battery cages in large-scale facilities. This method increases production density and egg yield per square metre, but it also exacerbates animal welfare issues due to the high confinement and restricted movement of the hens.[64] An investigation led by Animal Equality Brazil found that, despite the existence of some regulations on laying hens, the animals endure cruel conditions for egg production, such as mutilation of beaks without pain medication, extreme confinement in battery cages, and being deprived of sunlight and freedom of movement.[65] Also, male animals are shredded, suffocated, drowned or crushed because they have no value for the industry, as they cannot produce eggs or grow fast enough for the production of meat.

There is an ongoing draft bill in the Brazilian Congress aimed at prohibiting the use of cages and extreme confinement systems in food production and feather and leather extraction. This initiative is being driven by the **'Brazil Without Cages'** campaign, led by Animal Equality, the Fórum Nacional de Proteção e Defesa Animal and World Animal Protection. The Agricultural Commission issued a recommendation for rejection of the bill due to strong opposition from the agricultural representatives. However, the bill is yet to be voted on by the Brazilian Congress.

Gestation crates

In pig meat production, gestation crates are commonly used for pregnant sows. These individual stalls confine animals during their gestation period, severely limiting their mobility, causing discomfort, compromising thermoregulation and causing many health problems. The confinement hinders their ability to engage in natural behaviours such as rooting, foraging, rolling, and huddling with other pigs,[66] leading to numerous health problems and increasing stress among the sows.

In the EU, the use of gestation crates for pregnant sows is banned under the Pigs Directive 2008/120/EC, with the exception of the first four weeks of pregnancy and the week before giving birth. Member States were given until 2013 to transition gestating sows to group housing. This type of housing has been shown to offer numerous benefits, including calmer behaviour and improved overall quality of life for the sows.[67]

The ongoing use of gestation crates in Mercosur countries highlights a significant gap in animal welfare standards compared to the EU. In Brazil, for example, gestation crates are

common throughout the whole gestation period, and many organisations are trying to ban this practice.[68] While the EU has implemented regulations to phase out this practice, similar protections are lacking in Mercosur. This discrepancy could be a major concern, particularly for EU consumers and policymakers who are committed to higher animal welfare standards.

Mutilation

In all EU Member States, over three quarters of citizens believe that banning animal mutilation is crucial to meet ethical concerns.[69] **Not adopting stronger commitments by Mercosur countries to EU standards on the prohibition of mutilation means that European citizens may consume imported goods produced with cruel practices they condemn, while at the same time hindering improvements in animal welfare conditions in Mercosur countries.**

Animal welfare regulations in Mercosur Member States reveal a lack of specific provisions addressing the prohibition of mutilation of farmed animals. Argentina's regulation includes some measures against specific practices, such as restriction of the use of electric prods; however, it does not comprehensively address mutilation. In Brazil, Uruguay and Paraguay, legislation primarily focuses on animal health focused on food safety, and there are no regulations that target specific mutilation practices directly. For example, common practices in Brazil still include the mutilation of piglets by removing their tail, ear notching, tooth extraction and castration without any pain medication.[70]

Deforestation and other environmental problems

Grain production

The TSD chapter of the FTA as it stands lacks enforceable provisions with sanctions or conditioning tariff liberalisation on compliance with its provisions. **This will negatively impact existing deforestation drivers related to agrifood, such as soy production for animal feed, since the FTA will increase production in Mercosur countries.** Soy is the second largest driver of deforestation, and around 80% of the global soybean supply is used to feed livestock. Brazil is the world's largest producer of soy, accounting for 36% of global production, followed by the USA (34%) and Argentina (12%).[71] Chickens imported by the EU from Mercosur, especially Brazil, are also often fed on soy. Between 2001 and 2015, soy farms were responsible for the deforestation of **8.2 million hectares of land**,[72] mostly in South America (61% in Brazil, 21% in Argentina, 9% in Bolivia and 5% in Paraguay).

Within Brazil, 48% of the deforested land replaced by soy is in the Amazon, and 45% in the Cerrado, where 58% of deforestation is direct, compared to 39% in the Amazon.[73] While the rate of soy-driven deforestation decreased in the early 2000s,[74] it still indirectly contributed to substantial deforestation in the Amazon.[75] According to the EU Joint Research Centre, in 2022 the Amazon lost more than 35,000 km² of intact humid forest to deforestation and forest degradation.[76] **Plantations have expanded onto former pasturelands in Brazil, potentially displacing livestock pastures further into forested areas and leading to more deforestation**.

The EU is the second largest importer of soy after China.[77] As a consequence, tropical deforestation is estimated to contribute to one sixth of the carbon footprint associated with the average European citizen's diet. In an attempt to make important changes, the EU introduced the 'Deforestation-free' regulation in 2023, targeting seven key commodities: soy, cattle, palm oil, cocoa, coffee, rubber and wood, along with their by-products, such as leather, chocolate, tyres and furniture. It requires European companies and supply chain operators and traders to verify that products sold within EU markets do not originate from land deforested after 2020. **While the EU Deforestation regulation covers soy imported for animal feed, it does not extend to products made from soy-fed animals, which contribute to 90% of the EU's estimated soy consumption.[78]**

Extensive animal farming

Extensive animal farming is a livestock production system where animals are raised on pasture, typically resulting in lower productivity per unit of surface area, and allowing more freedom of movement compared to industrial production methods. These systems are common in Mercosur countries.

However, **the extensive use of land for meat production is closely linked to deforestation of the Amazon and Cerrado, two of the largest biomes in Brazil**. Research indicates that deforestation and land conversion linked to cattle increased by 60% from 590,000 hectares in 2016 to 948,700 hectares in 2020.[79] Additionally, around 75% of undesignated public forests in Brazil were converted for pasture between 1997 and 2020, suggesting widespread illegal land occupation.[80] In the Cerrado alone, cattle deforestation was 255,385 ha in 2016 and 332,706 ha in 2020.[81] Brazilian meat exports accounted for 339.2 million tonnes of CO_2 due to deforestation from 2015 to 2020,[82] **representing 37% of the country's emissions**.

Despite having signed the agreement to refuse cattle from farms directly involved in the Amazon deforestation in 2009, Brazil still has major problems with tracking the meat supply chain. In 2021, Greenpeace led an investigation that revealed that JBS, the world's largest meat producer and exporter, used cattle sourced from deforested areas through a practice known as 'grilling' – illegal land appropriation and falsification of documents.[83] In Argentina, Greenpeace's 2020 annual report highlighted that deforestation from livestock farming was the primary source of carbon emissions in the northern part of the country.[84] Deforestation affected 80,983 ha of land in 2019 and 114,716 ha in 2020.[85] **With the ratification of the agreement as it stands, these issues are likely to increase due to the intensification of trade in animal products, which is why products derived from animals raised in extensive farming systems need to be thoroughly monitored and follow the EU's Regulation on Deforestation-free Products.**

Pollution from feedlots

While feedlots may use less land compared to extensive grazing systems, this does not make them environmentally friendly. One major environmental issue associated with feedlots is their contribution to deforestation, particularly due to the grain feed required for the system. The high density of animals in feedlots also increases the risk of pollution, including higher greenhouse

gas emissions, particularly methane, and water contamination from the waste generated by the intensive nature of feedlot operations.

Public health problems

Public health concerns related to animal rearing practices endorsed by the FTA as it stands comprise antimicrobial resistance, food safety and the use of pesticides in farming.

Antimicrobial resistance

Although the FTA fosters cooperation on the use of antibiotics in farming, **it fails to establish enforceable commitments. Since the levels of protection vary considerably between the two blocs, European consumers could be exposed to increased health problems**, because the FTA weakens the precautionary principle and food safety controls by allowing for rapid pre-approval of goods, reducing the frequency and effectiveness of checks, and limiting their authority to block imports in case of suspected violations.

In the EU, the use of antimicrobial agents as growth promoters in animals was banned in 2006. Other regulations introduced in 2017 and 2018 require that medically important antimicrobials can only be sold with a veterinary prescription for therapeutic use in animals. According to the FAO–WHO–OIE global monitoring system, Argentina, Brazil, Paraguay and Uruguay all have national antimicrobial resistance action plans under implementation status,[86] although the attention given to antibiotics use in the agrifood sector varies considerably in each country. While Argentina and Brazil target the health of farmed animals as a main focus of their action plans, Uruguay and Paraguay do not prioritise the sector. Most countries have no laws or regulations that prohibit the use of antibiotics for growth promotion in terrestrial animals in the absence of risk analysis, while Paraguay has no laws or regulations on the prescription and sale of antimicrobials for use in terrestrial animals at all.

Food safety

Another major concern regarding the EU–Mercosur agreement is its impact on food safety. By facilitating an increase in animal products from Mercosur entering the EU, **the FTA could lead to lower standards and pose risks to public health**. **Food-borne zoonotic diseases** are caused by microorganisms transmitted from animals to humans through contaminated food or water. The consumption of animal products generally carries a higher risk of contamination, leading to more illnesses and deaths compared to plant-based produce. Many food-borne illnesses in produce can trace their origins back to livestock or inadequate manure treatment.[87] In fact, approximately a third of food-borne illnesses from plant sources have animal origins.[88]

With the rapid pre-approval of goods regarding safety issues established by the FTA, the prior identification of possible food contaminations would be jeopardised. Therefore, animal welfare is a big ally in the prevention of food-borne zoonotic diseases. Allowing animals to express natural behaviours – something not often possible in factory farming – can reduce their stress levels, which, in turn, may help decrease the shedding of pathogens and contribute to better overall food safety.[89] Despite the significant health concerns related to contamination by food of animal origin, the FTA lacks effective provisions to ensure that the food exported and consumed

in the EU meet the EU's high safety standards. Notably, it does not effectively incorporate the precautionary principle, since it reduces the frequency and effectiveness of checks and limits the authority of the importing country to block imports in cases of suspected violations.

For goods imported by the EU, border surveillance is a critical measure to safeguard consumer health by ensuring that food products entering the EU meet safety standards and comply with regulatory requirements. In the import of animal products, **the primary food safety concerns revolve around contamination occurring at two key stages: farm level and during slaughter**. The contamination of animal products at the pre-slaughter or pre-processing stage can be reduced or prevented by using high disease standards and good practices. Even though **EU food safety standards apply to imported goods**, they are insufficient in light of the ineffectiveness of the precautionary principle in the agreement. **Furthermore, the misuse or overuse of antibiotics makes infections harder to treat and potentially leads to public health challenges. Given the importance of this Agreement for Mercosur countries, the EU had the potential to negotiate for sanitary standards in the Southern bloc to be raised to EU levels, rather than prioritizing trade, thereby exposing both European and Mercosur consumers to zoonotic diseases.**

In Brazil, a major scandal in 2017 involved the bribery of food safety inspectors to permit exports of tainted meat products, revealing practices such as adding chemicals to mask the smell of rotting meat, incorporating pigs' heads into sausages, and using cardboard as a filler in processed chicken.[90] Nevertheless, 39 of the inspectors implicated in the investigation remained in their positions.[91] More recently, with support from the larger food producers and processors, the Brazilian Congress approved Law 14.515/2022, which withdraws mandatory inspection and allows companies to control themselves. Before being approved, Animal Equality, the National Union of Federal Agricultural Tax Auditors (ANFFA Sindical) and the Confederation of Workers of the Food Industry (CNTA), with the support of more than 30 other national organisations, mobilised to stop the law's approval, claiming that it would be detrimental to animal welfare, food safety, workers' health and the environment. However, the bill was approved by the Brazilian Congress. CNTA filed a lawsuit, calling on the Supreme Court to declare the law unconstitutional, which is yet to be ruled.[92] The EU's Rapid Alert System for Food and Feed named Brazil and Argentina among the top 10 countries with the highest number of notifications of food hazards – Brazil for salmonella and Argentina for aflatoxins.[93] In 2019, investigations indicated that around 1 million salmonella-contaminated chickens were exported to the UK in the previous two years.[94]

In addition to biological hazards, **chemical contaminants[95]** also pose significant risks to food safety, such as drug residues, harmful chemicals, and environmental pollutants such as heavy metals. Prevention of these contaminants requires comprehensive measures across the entire food chain. As global trade intensifies, ensuring robust safety protocols, from farm to table, is essential to mitigate risks associated with increased food trade and maintain high safety levels. In the EU in 2022, there were over 5,000 outbreaks of food-borne diseases, representing a 44% increase compared to 2021.[96]

▪ Pesticides

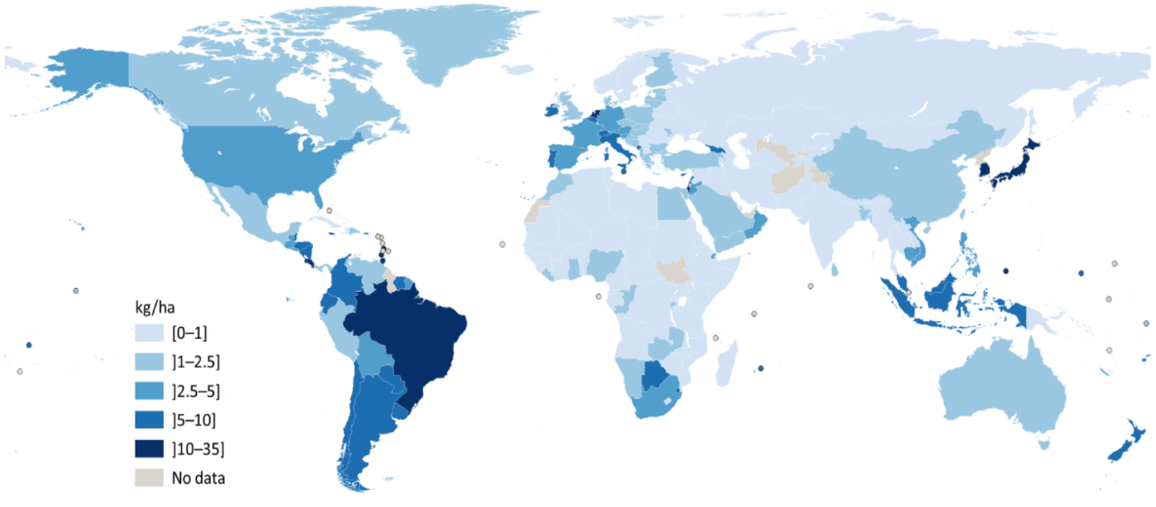
The use of pesticides in Mercosur crops raises significant health concerns for products imported by the EU. **The discrepancy in regulations could result in higher pesticide residues on imported goods**, as shown by a Greenpeace study on limes imported from Brazil, posing

potential health risks to consumers in the EU. The study revealed that "toxic substances banned in the EU are exported to Brazil and returned to Europe in the form of residues in food", and the EU–Mercosur agreement could "further fuel a vicious cycle by encouraging more production, sale and use of hazardous substances".[97]

Brazil is a major consumer of pesticides, spending over US$10 billion annually. According to the Food and Agriculture Organization of the United Nations (FAO), Brazil was the world's largest user of pesticides in 2022, consuming over 801 kt of pesticides for agricultural use, which represents 12 kg/ha. A significant proportion of pesticides used for agriculture in Brazil are banned in the EU. **Approximately 44% of the substances registered for use in Brazilian crops are prohibited in the EU,[98] many of which are classified as highly toxic.** Additionally, **pesticide residue limits in Brazil can exceed the permitted EU standards by over 1,000 times**. The country is also the world's largest buyer of Highly Hazardous Pesticides (HHPs),[99] known for their particularly high risks to human health and the environment.[100] Pesticide residues could be present in the food imported by the EU, as imported food may be twice as likely to contain pesticides banned in the EU compared to food grown within the EU.[101]

Argentina is another heavy user – the country with the fourth highest agricultural use of pesticides in 2020[102] and having consumed over 2.635 million tonnes in 2022.[103] A report produced by the UN Special Rapporteur on the right to food considered the dependence on pesticides in the country a major concern for food security and workers' health and safety.[104]

Meanwhile, EU countries have consumed an average of 350 kt of pesticides a year,[105] with consumption having decreased by over 5% since 1990.[106] Additionally, Europe has one of the lowest pesticide uses per capita, while the Americas have one of the highest rates in the world.[107]



The boundaries and names shown and the designations used on these map(s) do not imply the expression of any opinion whatsoever on the part of FAO concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers and boundaries. Dashed lines on maps represent approximate border lines for which there may not yet be full agreement. Dotted line represents approximately the Line of Control in Jammu and Kashmir agreed upon by India and Pakistan. The final status of Jammu and Kashmir has not yet been agreed upon by the parties.

Figure 3. Pesticides use per cropland area (2022)

Source: Food and Agriculture Organization of the United Nations. (2024). Pesticides Use. https://www.fao.org/faostat/en/#data/RP. Licence: CC-BY-4.0.

Nevertheless, **many of the pesticides sold to Mercosur countries are imported from EU companies**. Even though European countries consume fewer pesticides on average, they are also some of the world's largest pesticide exporters[108] and are still allowed to produce highly hazardous pesticides banned in the EU and sell them to other countries. EU Member States approved the export of 10,945 tonnes of pesticides banned in Europe to Argentina, Brazil, Paraguay and Uruguay in 2018 and 13,667 tonnes in 2019.[109] **The agreement aims to reduce tariffs on these chemicals by more than 90%, which could result in an increase in exports to Mercosur countries and increasing the risk of diseases associated with the consumption of contaminated products.**

According to the UN Special Rapporteur on the right to food, pesticides can persist in the environment for decades and pose a global threat to the ecological systems essential for food production, also leading to soil and water contamination, loss of biodiversity, and the elimination of beneficial insect populations, such as bees.[110] **Exposure to pesticide residues has been linked to various health problems, including cancer, cardiovascular diseases, respiratory and neurological disorders, and developmental delays in children.**[111] **The heavy use of pesticides in animal feed can also impact the well-being and safety of animals.**[112] This poses serious threats to consumer health, as several pesticides not approved in the EU can be found in Mercosur in concentrations exceeding the legal limit from sampled imported food.[113]

Therefore, **by reducing tariffs on EU pesticide exports and boosting trade with some of the world's largest pesticide users, the EU–Mercosur agreement appears to be inconsistent with the EU's Farm to Fork Strategy**, which aims to decrease pesticide use and eliminate residues of unregistered pesticides from food, **and the EU Green Deal**, which targets a 50% reduction in overall pesticide use and risks by 2030.

PROPOSALS TO STRENGTHEN ANIMAL WELFARE PROTECTION IN THE CONTEXT OF THE EU-MERCOSUR FTA

Given all the potential risks posed by the current text of the FTA, the lack of animal welfare provisions conditioning liberalisation of goods, and the non-enforceability of many clauses, we recommend stopping the deal and renegotiating a new agreement with a new, up-to-date mandate that should include:

- a revised market access offer to further limit the volume granted in TRQs to animal-based products, and to condition access to such TRQs on relevant EU animal welfare standards, according to the model applied for shelled eggs.
- strengthening within the SPS chapter the application of the precautionary principle with regard to food safety;
- strengthening the TSD chapter to include monitoring mechanisms that enable impact assessments to be conducted on the FTA's impact on animals, citizens and the environment, and the establishment of tools to reverse potential negative impacts;
- including cooperation mechanisms to: (i) raise animal welfare standards in Mercosur countries to the EU's levels; (ii) phase out feedlots, ensuring all meat from Mercosur comes from pastures; and (iii) implement a tracking system in the supply chains of animal products that allows full transparency to South American and European consumers about animal welfare standards adopted and about the identification and promotion of products from companies not involved in environmental crimes and animal cruelty;
- establishing an advisory board comprising civil society representatives from animal protection organisations;
- requesting all concerned countries to develop plans for the tracking and control of the use of antibiotics as growth promoters in farmed animals;
- requesting that direct subsidies financed with taxpayers' money be granted only to companies and producers not involved, directly or indirectly, in environmental crimes and animal cruelty;
- facilitating technology transfers that enable the traceability of supply chains and the banning of cruel practices in the agrifood industry; and
- using accountable and non-refundable funds to finance the transition to cage-free and more sustainable agrifood production systems, in support of small, medium-sized and large companies and producers, according to EU animal welfare standards and 2030 goals.

APPENDIX

Data on trade between the EU and MERCOSUR

TABLE A.1. FTA's EU MARKET ACCESS TO MERCOSUR		
Product	TQR (tonnes)	Duty
Bovine meat	99,000	7.5%
Chicken meat	180,000	Duty free
Pig meat	25,000	€83 per tonne

TABLE A.2. EU IMPORTS FROM MERCOSUR IN 2023		
Product[114]	Import volume (tonnes)	Proportion of total imports
Bovine meat	141,474	56.3%
Bovine and equine skins and leather	132,469	32.8%
Other meat and edible offal	117,251	43.8%
Chicken meat and edible offal	71,585	17.7%
Equine meat	13,225	96.6%

TABLE A.3. IMPORTANCE OF THE EU MARKET TO MERCOSUR IN 2023 (IN VOLUME)		
Product[115]	Export volume (tonnes)	Proportion of total exports
Chicken meat and edible offal	187,680	4.3%
Bovine meat and edible offal	140,904	3.9%
Skins and leather	123,074	17.7%
Equine meat	12,193	66.6%
Other meat and edible offal	10,225	0.5%

TABLE A.4. IMPORTANCE OF THE EU MARKET TO MERCOSUR IN 2023 (IN VALUE)			
Product[116]	Export value (€ millions)[117]	Proportion of total exports	Place among main destinations[118]
Bovine meat and edible offal	1,130	7.8%	**4th** *(1: China, 2: Chile, 3: USA, 5: Israel)*
Chicken meat and edible offal	440.4	5.9%	**14th** *(1: China, 2: Japan, 3: UAE, 4: Saudi Arabia, 5: Mexico)*
Skins and leather	261.4	18.7%	**2nd** *(1: China, 3: USA, 4: Thailand, 5: Vietnam)*
Equine meat	43.7	67.4%	**1st** *(2: Japan, 3: China, 4: Russia, 5: Kazakhstan)*
Other meat and edible offal	31.7	0.8%	**1st** *(2: UK, 3: China, 4: Hong Kong, 5: Russia)*

TABLE A.5. TOP EU PROVIDERS OF BOVINE MEAT IN 2023		
Largest partners	Import value (€ millions)	Proportion of total imports
1. **Argentina**	**511.8**	**23%**
2. United Kingdom	471.4	21%
3. **Brazil**	**414.2**	**18.6%**
4. **Uruguay**	**309.9**	**14%**
5. United States	240.1	10.8%

TABLE A.6. TOP EU PROVIDERS OF OTHER MEAT AND EDIBLE OFFAL IN 2023		
Largest partners	Import value (€ millions)	Proportion of total imports
1. **Brazil**	**284.3**	**39%**
2. Thailand	145.8	20%
3. United Kingdom	129.3	17.7%
4. New Zealand	54.2	7.4%
5. Switzerland	46.5	6.4%

TABLE A.7. TOP EU PROVIDERS OF SKINS AND LEATHER IN 2023		
Largest partners	Import value (€ millions)	Proportion of total imports
1. **Brazil**	**232.7**	**18.8%**
2. United States	130.9	10.6%
3. United Kingdom	88.6	7.2%
4. New Zealand	75.2	6.1%
5. **Paraguay**	**22.6**	**5.9%**

TABLE A.8. TOP EU PROVIDERS OF CHICKEN MEAT AND EDIBLE OFFAL IN 2023		
Largest partners	Import value (€ millions)	Proportion of total imports
1. Ukraine	393.7	53.7%
2. **Brazil**	**161.5**	**22%**
3. United Kingdom	126.1	17.2%
4. Thailand	17.5	2.4%
5. Norway	8.4	1.1%

TABLE A.9. TOP EU PROVIDERS OF EQUINE MEAT IN 2023		
Largest partners	Import value (€ millions)	Proportion of total imports
1. **Argentina**	**40.5**	**61.4%**
2. **Uruguay**	**24.1**	**36.5%**
3. Iceland	0.5	0.7%
4. United Kingdom	0.4	0.6%
5. Australia	0.2	0.3%

TABLE A.10. TOP EU PROVIDERS OF BOVINE, SHEEP AND GOAT FAT IN 2023		
Largest partners	Import value	Proportion of total imports
1. United Kingdom	19.3	76.8%
2. **Argentina**	**2.4**	**9.6%**
3. Serbia	0.99	4%
4. Switzerland	0.93	3.7%
5. Israel	0.7	3.1%

Key:

- Regulations that go against good animal welfare standards, either by allowing condemned practices or by not addressing them altogether.
- Regulations that need further progress to meet good animal welfare standards.
- Regulations aligned with good animal welfare standards.

Comparison of animal welfare standards in EU and Mercosur countries

	EU	BRAZIL	ARGENTINA	URUGUAY	PARAGUAY**
Enclosures					
Laying hens					
Battery caes	PROHIBITED (Directive 1999/74/EC)	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Enriched cages	ALLOWED **but banned in 7 countries, while others are in the process of phasing out*	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Average cage size	Minimum 750 cm^2 (Directive 1999/74/EC)	Between 350 cm^2 and 450 cm^2 (ABNT NBR 16437:2016)	Not specifiedg	Not specified	Not specified
Stocking density	9 birds/m^2 (Directive 1999/74/EC)	7 birds/m^2 (free range) (ABNT NBR 16437:2016)	Not specified	Not specified	Not specified
Broilers					
Density	Around 33 kg/m^2 and up to 42 kg/m^2 (Directive 1999/74/EC)	Not specified	Not specified	Not specified	Not specified
Bovines					
Intensive farming (feedlots)	ALLOWED **but majority of production is in extensive farming*	ALLOWED (Federal Law 8171/91) **but majority of production is in extensive farming*	ALLOWED (Res. 1697/2019) **but majority of production is in extensive farming*	ALLOWED **but majority of production is in extensive farming*	ALLOWED **widely practised*

	EU	BRAZIL	ARGENTINA	URUGUAY	PARAGUAY**
Density	Not specified	Not specified	Min dry space of 4.5 m^2/animal (Protocol of Animal Welfare Assessment for Fattening Cattle in Feedlots)	Not specified	Not specified
Cages for calves	ALLOWED **but regulated by Directive 2008/119/EC*	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Sows					
Sow stalls	ALLOWED **only in first four weeks of pregnancy and in week prior to birth*	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Density	Minimum of 2.25 m^2/animal (Directive 2008/120/EC)	Minimum of 2 m^2/animal (Normative Instruction 113 of 16/12/2020)	Not specified	Not specified	Not specified
Animal feed and breeding (general)					
Preventive use of antibiotics	PROHIBITED **allowed only in exceptional cases* (Art. 107, Regulation 2019/6/EU/EC)	PROHIBITED **many substances are prohibited, but no general prohibition found* (Normative Instruction No. 1 of 13/01/2020)	PROHIBITED (Law 14346/54, Art. 2.5)	ALLOWED	ALLOWED
Antibiotics as growth promoters	PROHIBITED (Regulation 2019/6/EU/EC)	PROHIBITED **many substances are prohibited, but no general prohibition found* (Normative Instruction No. 1 of 13/01/2020)	PROHIBITED (Law 14346/54, Art. 2.5)	PROHIBITED ******* *for bovines and sheep* (Decree 098/011)	ALLOWED

	EU	BRAZIL	ARGENTINA	URUGUAY	PARAGUAY**
Fast-growing breeds (broilers)	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Force-feeding (ducks and geese)	ALLOWED	ALLOWED	PROHIBITED (Resolution 413/2003)	ALLOWED	ALLOWED
Mutilation					
General					
Mutilation without pain relief	PROHIBITED (Regulation 1099/2009/EC)	PROHIBITED (Federal Decree 9.013/2017)	PROHIBITED (Law 14346/54)	ALLOWED **but regulated by Decree 205/017*	ALLOWED
Laying hens					
Culling of male chicks	ALLOWED **but banned in 3 countries: Germany, France and Austria; another 3 moving towards a ban: Netherlands, Italy and Spain*	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Beak trimming	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Forced moulting	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Bovines					
Dehorning	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Tail docking	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED
Branding on skin	ALLOWED	ALLOWED	ALLOWED	ALLOWED	ALLOWED

	EU	BRAZIL	ARGENTINA	URUGUAY	PARAGUAY**
Sows					
Tail docking	ALLOWED **but regulated by Directive 2008/120/EC*	ALLOWED **but regulated by Normative Instruction 113/2020*	ALLOWED	ALLOWED	ALLOWED
Tooth clipping	ALLOWED **but regulated by Directive 2008/120/EC*	PROHIBITED (Normative Instruction 113/2020)	ALLOWED	ALLOWED	ALLOWED
Slaughter (general)					
Slaughter without humane conditions	PROHIBITED (Regulation 1099/2009/EC)	PROHIBITED (Federal Decree 9.013/2017)	PROHIBITED (Res. 1697/2019) **use of mace specifically prohibited by Law 18.819/70*	PROHIBITED (Res. 152/012; Decree 369/983; Law 18.471/009)	ALLOWED
Slaughter without prior desensitisation	PROHIBITED (Regulation 1099/2009/EC)	PROHIBITED (Federal Decree 9.013/2017)	PROHIBITED **for bovines, equines, pigs, sheep and goats* (Law 18.819/70); *extended for birds and rabbits* (Res. 575/2018, Annex C)	PROHIBITED (Res. 152/012; Decree 195/018; Law 18.471/009)	ALLOWED

***In Paraguay, no specific regulation addressing the welfare of farmed animals was found. General regulations on the rearing of animals for consumption are available at* https://www.senacsa.gov.py/index.php/Temas/publicaciones-tecnicas.

Note: EU animal welfare standards are likely to improve with the upcoming revision of animal welfare legislation.

EU framework regarding the welfare of farmed animals

EUROPEAN UNION	
Lisbon Treaty	Inserted the operative part of the former EC Protocol on Protection and Welfare of Animals as a provision in the TFEU. Introduced the recognition of animals are sentient beings.
Treaty on the Functioning of the European Union	Art. 13 provides the recognition of animals as sentient beings.
Treaty on the European Union	'Sustainable development' and 'environmental protection' are founding values mentioned in Preamble and Arts. 2, 3(5) and 21. No mention of 'animal welfare'.
Council Decision 1978/923/EEC – European Convention for the Protection of Animals kept for Farming Purposes	Incorporated into the EU animal welfare provisions that reflect the Five Domains
Council Directive 1998/58/EC	Concerning the protection of animals kept for farming purposes
Council Directive 1999/74/EC	Provisions on laying hens
Council Directive 2007/43/EC of 28 June 2007	Minimum rules for the protection of chickens kept for meat production (text with EEA relevance)
Council Directive 2008/119/EC of 18 December 2008	Minimum standards for the protection of calves
Council Directive 2008/120/EC of 18 December 2008	Minimum standards for the protection of pigs
Council Regulation (EC) No 1099/2009 of 24 September 2009	Protection of animals at the time of killing
Directive 2011/92/EU (amended by Directive 2014/52/EU)	Impact assessment of certain projects on the environment
Regulation 1305/2013 on Rural Development	Incentives for the practice of above-minimum animal welfare standards
Regulation (EU) 429/2016	Regulation on zoonosis (Animal Health Law)
Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017	Official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products
Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018	Regulation on veterinary medicinal products and repealing Directive 2001/82/EC

Other EU trade agreements that include provisions on animal welfare

EU TRADE AGREEMENTS WITH THIRD PARTIES		
Third party (date)	**Type of agreement**	**Provisions on animal welfare**
Chile (2002)	FTA	- Annex IV, Article 1(2): "This Agreement aims at reaching a common understanding between the Parties concerning animal welfare standards." - Annex IV Art. 4 lit.(k): reference to OIE animal health standards - Annex IV, Art. 12(2)(e): agreed animal welfare standards - Art. 91: reference to Article XX GATT
South Korea (2010)	FTA	- Art. 5.1. Sec. 2: agreed animal welfare standards - Art. 5.9: agreed animal welfare standards
Andean States (Colombia, Peru and Ecuador, potentially Bolivia) (2012)	Agreement	Provisionally applied since 2013 to Colombia and Peru, and since 2017 to Ecuador - Art. 102: agreed animal welfare standards - Art. 174: reference to Article XX GATT
Central American States (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, Panama) (2013)	Association Agreement	Trade part provisionally applied since 2013. - Art. 62: agreed animal welfare standards - Art. 158: reference to Article XX GATT
Brazil (2013)	Memorandum of Understanding	- Art. 1: reference to OIE animal health standards - Sec. 2: agreed animal welfare standards - Administrative Memorandum of Understanding on Technical Cooperation in the Area of Animal Welfare between the Ministry of Agriculture, Livestock and Food Supply of The Federative Republic of Brazil and the Directorate General of Health and Consumers of The European Commission of 24 January 2013
Ukraine (2014)	Association Agreement	Political part signed in March 2014; economic part signed in June 2014 - Art. 68(4) and Art. 404: agreed animal welfare standards - Art. 271: reference to Article XX GATT. This provision refers to "public policy", and animal life or health - Art. 62(13) (reference to OIE animal health standards) - Article 64 on "regulatory approximation" (Annex IV-B to Chapter 4): legal approximation of animal welfare standards in the three fields of stunning and slaughter, transport and farming animals
Georgia (2014)	Association Agreement	- Art. 53(13): reference to OIE animal health standards - Art. 59(4): agreed animal welfare standards - Article 55 (Annex XI-A and Annex IV-B): legal approximation of animal welfare standards in the three fields of stunning and slaughter, transport and farming animals

EU TRADE AGREEMENTS WITH THIRD PARTIES		
Moldova (2014)	Association Agreement	- Art. 179 (13): reference to OIE animal health standards - Article 181: Legal approximation of animal welfare standards in the three fields of stunning and slaughter, transport and farming animals: details set out in Annex XVII-B and Annex XXIV-A)
Canada (2016)	Comprehensive Economic and Trade Agreement	Provisional entry into force in September 2017 - Art. 21(4) lit.(s): agreed animal welfare standards - Art. 28(3): reference to Article XX GATT
Philippines (2017)	Trade Agreement	Under negotiation/provisionally applied - Art. 35: agreed animal welfare standards - European Commission, Negotiations with the Philippines: Sanitary and Phytosanitary Measures, EU proposal, 9 January 2017
Japan (2017)	Trade Agreement	- Art. 18.17: agreed animal welfare standards - Art. 8(3): reference to Article XX GATT
Vietnam (2018)	Trade Agreement	Under negotiation/provisionally applied - Art. 16.3: agreed animal welfare standards - Art. 8 (53) (non-binding text as of 2018): reference to Article XX GATT
Mexico (2018)	Global Agreement	Not yet in force - Arts. 1, 2 and 3 of the EU–Mexico Modernisation of the Trade part of the EU–Mexico Global Agreement (provisional text of 21 April 2018): 1. The Parties recognise that animals are sentient beings. 2. The Parties recognise the value of the OIE animal welfare standards, and shall endeavour to improve their implementation while respecting their right to determine the level of their science-based measures on the basis of OIE animal welfare standards. 3. The Parties undertake to cooperate in international fora with the aim to promote the further development of good animal welfare practices and their implementation. The Parties recognise the value of increased research collaboration in the area of animal welfare. - Chapter on 'Cooperation in Animal Welfare and Antimicrobial Resistance' - Recognition of animals as sentient beings - Reference to OIE animal health standards
Singapore (2018)	FTA	Not yet in force - Art. 9(3): agreed animal welfare standards - Appendix 1: agreed animal welfare standards
New Zealand (2024)	FTA	Provisional entry into force in May 2024 - The agreement has a dedicated chapter on 'Sustainable Food

EU TRADE AGREEMENTS WITH THIRD PARTIES		
		Systems and Animal Welfare' - The EU and New Zealand have agreed to cooperate more closely on animal welfare standards - The EU and New Zealand have committed to take initiatives to phase out the use of antimicrobial agents as growth promoters and to reduce the use of antimicrobial agents in animal production - The EU and New Zealand have also agreed to cooperate on food loss and waste, pesticides and fertilisers, and ensuring the security and resilience of food supply chains

Mercosur countries' frameworks regarding the welfare of farmed animals

ARGENTINA	
Law 14346/1954	Protection against mistreatment and cruel acts in all species
Law 18819/1970	Ban on the use of mallets for stunning animals during slaughter
Decree 206/2001	National Organic Production Programme: Environmental conditions and management practices regarding animal welfare
Resolution 413/2003	Prohibition of force-feeding ducks and geese
Resolution 617/2005	Institutes the Equine Disease Control and Eradication Programme and its Sanitary Control Regulation
Resolution 25/2013	Restrictions on the use of electric prods and others
Resolution 46/2014	Addition of Chapter XXXII to the Inspection Regulation
Resolution 374/2016	System for production, marketing, control and certification of organic products
Resolution 329/2017	National Registry of Feedlot Livestock Establishments
Resolution 575/2018	Establishment of requirements for animal welfare in broiler production systems
Resolution 893/2018	Regulatory framework for providing horses for slaughter
Resolution 1697/2019	New animal welfare requirements in livestock and sports settings
Resolution 924/2020	Authorisation of cattle gathering sites
Resolution 301/2021	Authorisation of livestock establishments for the extraction of material for equine blood products
Resolution 542/2021	Creation of National Committees for Animal Health and Welfare
Resolution 503/2022	Authorisation of means of transport for live animals and animal-origin goods
Resolution 827/2023	Replacement of Section a, Article 10 of Resolution 924/2020 regarding the authorisation of Concentrated Markets and Fairgrounds
BRAZIL	
Federal Constitution (1988)	General provisions on animal cruelty
Federal Law 14.515/2022	Regulation on private monitoring of animal agriculture
Federal Law 9.605/1998	Prohibits animal mistreatment

Federal Law 8.171/1991	Regulates agricultural policies and has general provisions on animal production
Federal Law 6.198/1974	Regulation on the inspection and monitoring of products destined to feed animals
Draft Bill No. 5092/2023	Intends to prohibit the use of cages and extreme confinement of animals created for human consumption
Decree 365/2021 (MAPA)	Regulation on technical practices before and at the time of killing ('humane slaughter')
Decree 9.013/2017	Regulation on sanitary measures and monitoring of animal products
Decree 76.986/1976	Regulations on the inspection and monitoring of products destined to feed animals
Normative Instruction 56/2008 of the Ministry of Agriculture and Livestock	Animal welfare recommendations for farm animals
Normative Instruction 138/2022	Regulation on monitoring animal agriculture businesses
Normative Instruction 113/2020	Minimum standards for the protection of pigs
Normative Instruction 110/2020	Regulation on ingredients used in animal feeding
Normative Instruction 40/2020	Regulation on ingredients used in animal feeding
Normative Instruction 27/2020	Monitoring of products destined to feed animals in the industry
Normative Instruction 48/2019	Regulation on animal waste
Normative Instructions: **54/2018** **45/2016** **9/2016** **14/2012** **26/2009** **11/2004**	Regulations on the use of antibiotics in veterinary use
Normative Instruction 55/2011	Prohibits the use of hormones in calves
Normative Instruction 17/2004	Prohibits the use of certain hormones in chickens
Resolution 675/2017 of the Ministry of Cities	Regulation on the transport of animals
Technical Norm ABNT No. 16437	Technical directions concerning laying hens and eggs
Technical Norm ABNT No. 16389:2015	Technical directions concerning chickens
URUGUAY	
Law 18.471/2009	Protection, Welfare and Ownership of Animals (Articles 4, 6, 9, 12 and 23 concern farm animals)
Law 3606/1911 (Animal Health Police)	Constitutes the basic normative framework of all regulations related to animal health and public health, aiming to ensure the protection of livestock production with sanitary measures that prevent the introduction of exotic diseases

Decree 195/2018	Creates a control system for the slaughter of birds, which aims at monitoring the quantity and weight of the birds; there is no mention of animal welfare. The National Meat Institute (INAC) is in charge of implementing the provisions of the Decree.
Decree 382/2016	Updates the values of milk quality parameters, and establishes the control of inhibitors
Decree 098/2011	Prohibits the use of antibiotics as growth promoters in cattle and sheep. Since 1986, total prohibitions have been established for importation, manufacture, sale and use of veterinary products concerning certain antimicrobials (Chloramphenicol, Carbadox and Olaquindox, Nitrofurans in dogs and cats, and Oxytetracycline in bees).
Decree 177/2004	Requires the registry of use of veterinary products for meat and milk production establishments. For milk, antimicrobial medications must be recorded in the form of a sworn declaration.
Decree 63/2002	Establishes that the content of microbial growth inhibitor residues must comply with the Maximum Residue Limits of the Codex Alimentarius, applied to residues of veterinary drugs
Decree 160/1997	Institutes the competent health authorities for registration and control of veterinary products, including antibiotics, from production or importation to commercialisation, as well as the registration and authorisation of manufacturing companies and facilities, warehouses and distributors
Decree 90/1995	Establishes the National Milk Quality System, setting minimum quality parameters for all milk destined to industrial plants, and regulates antimicrobials in the dairy industry
Decree 369/1983	Regulates veterinary inspection of animal products and has detailed regulation on the slaughtering of animals raised for production. Article 225 provides general requirements regarding animal transport.
Resolution 406/2018 of the General Directorate of Livestock Services	Updates the processes, activities and operations aimed at controlling biological residues in live animals and dairy products within the framework of the National Biological Residues Programme
Resolution 193A/2015	Regulates the marketing and use of antibiotics and antimicrobials in farm animals according to the standards and recommendations of international reference organisations

Resolution 14/2014 of the General Directorate of Livestock Services	Requirements for the authorisation and implementation of good manufacturing practices in establishments producing feed for animals solely intended for self-consumption, without commercialisation
Resolution 152/2012	Incorporates slaughtering rules from Council Directive EC No. 1099/2009, with similar wording of provisions
Resolution 48/2011 of the General Directorate of Livestock Services	Regulates the manufacturing, handling and marketing of veterinary drugs, including the use of antimicrobials in animal feed. Requires compliance with authorised conditions for antimicrobial use and adherence to Good Manufacturing Practices
Resolution 35/2011	Establishes a system of registry and identification of bovines to control their transport
Plan Nacional de Contención de la Resistencia Antimicrobiana de Uruguay (2018)	National Plan for Containment of Antimicrobial Resistance with a focus on animal health and food production chains
PARAGUAY	
Law 4840/2013	General animal protection and welfare law

ENDNOTES

[1] World Bank. (2023). *GDP per capita (current US$) - Brazil, Argentina, Paraguay, Uruguay, European Union*. https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?end=2023&locations=BR-AR-PY-UY-EU&start=1960&view=chart. This average considers the GDP per capita of the EU (US$40,823.9) and Mercosur's four full members in 2023: Uruguay (US$22,564.5), Argentina (US$13,730.5), Brazil (US$10,043.6) and Paraguay (US$6,260.5). Conversions to euros were calculated according to the exchange rate of the European Central Bank on 29 December 2023 (€1 = US$1.105). See https://data.ecb.europa.eu/currency-converter.

[2] Ghiotto, L., & Echaide, J. (2019). *Analysis of the agreement between the European Union and the Mercosur*. Anna Cavazzini MEP; The Greens/EFA, December 2019. https://www.annacavazzini.eu/wp-content/uploads/Final-REPORT-EU-Mercosur-26.10.2020.pdf.

[3] The report considered data from Mercosur's four full members until the end of 2023: Argentina, Brazil, Paraguay and Uruguay. Although Bolivia became a full member in July 2024, it has yet to adjust internal legislation to Mercosur rules and, therefore, is not included.

[4] All data in this section is sourced from the EU's Access2Markets: EU trade statistics (excluding United Kingdom). See https://trade.ec.europa.eu/access-to-markets/en/statistics.

[5] This category includes the following products, according to the EU's Access2Markets: (i) Edible offal of bovine and equine animals, pigs, sheep and goats; (ii) Other meat and edible meat offal from: rabbits or hares and other hunted animals; primates; whales, dolphins and porpoises; manatees and dugongs; seals, sea lions and walruses; reptiles; camels and other camelids; domestic pigeons; reindeers; frogs' legs; fatty livers of geese or ducks; and others, including edible flours and meals of meat or meat offal. See https://trade.ec.europa.eu/access-to-markets/en/statistics.

[6] Other key exporters of bovine meat to the EU in 2023 were the UK, in second place, and the USA, in fifth.

[7] The category of 'other meat' includes the following products, according to the EU's Access2Markets: (i) Edible offal of bovine and equine animals, pigs, sheep and goats; (ii) Other meat and edible meat offal from: rabbits or hares and other hunted animals; primates; whales, dolphins and porpoises; manatees and dugongs; seals, sea lions and walruses; reptiles; camels and other camelids; domestic pigeons; reindeers; frogs' legs; fatty livers of geese or ducks; and others, including edible flours and meals of meat or meat offal. See https://trade.ec.europa.eu/access-to-markets/en/statistics.

[8] According to data available at TradeMap.org. See https://www.trademap.org/Country_SelProductCountry_TS.aspx?nvpm=1%7c%7c34%7c%7c%7cTOTAL%7c%7c%7c2%7c1%7c1%7c2%7c2%7c1%7c4%7c1%7c1%7c1.

[9] European Union. (2023). Attitudes of Europeans towards animal welfare. https://europa.eu/eurobarometer/surveys/detail/2996.

[10] The Common Agricultural Policy uses two primary financial instruments to promote animal welfare: (i) cross-compliance, which conditions payments on adherence to rules on animal welfare, the environment, land maintenance, and animal and plant health; and (ii) the Rural Development Regulation (1305/2013), which grants payments to farmers committed to implement voluntary animal welfare standards higher than the mandatory EU rules.

[11] For instance, the EU has adopted the Community Action Plan on the Protection and Welfare of Animals (2006–2010) and the Strategy for the Protection and Welfare of Animals (2012–2015).

[12] European Commission. EU trade relationships by country/region: New Zealand. https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/new-zealand_en.

[13] European Commission. EU trade relationships by country/region: Ukraine. https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/ukraine_en.

[14] European Commission. EU trade relationships by country/region: Singapore. https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/singapore_en.

[15] European Commission. EU trade relationships by country/region: South Korea. https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/south-korea_en.

[16] European Commission. EU trade relationships by country/region: Vietnam. https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/vietnam_en.

[17] World Trade Organization. (2012). General Agreement on Tariffs and Trade, Article XX – General Exceptions. https://www.wto.org/english/res_e/booksp_e/gatt_ai_e/art20_e.pdf.

[18] World Organisation for Animal Health (2025). Standards. https://www.woah.org/en/what-we-do/standards/.

[19] EU–South Korea (2010); EU–Central American States (2012); EU–Andean States (2012); EU–Brazil Memorandum of Understanding on Technical Cooperation in the Area of Animal Welfare (2013); EU–Ukraine (2014); EU–Georgia (2014); EU–Moldova (2014); Canada–EU Comprehensive Economic and Trade Agreement (2016); EU–Philippines (2017); EU–Japan (2017); EU–Vietnam (2018); EU–Mexico Modernisation of the Trade Part of the Global Agreement (2018).

[20] Articles 64 of the EU–Ukraine Agreement (2014), 55 of the EU–Georgia Agreement (2014) and 181 (note 1038) of the EU–Moldova Agreement (2014).

[21] European Commission. (2024). Free Trade Agreement between the European Union and New Zealand. Official Journal of the European Union, 2024/866, p. 152. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202400866#page=152.

[22] European Commission. (2024). Free Trade Agreement between the European Union and New Zealand. *Official Journal of the European Union*, 2024/866, p. 518. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202400866#page=518.
[23] European Commission. *Health and Food Audits and Analysis*. https://food.ec.europa.eu/horizontal-topics/official-controls-and-enforcement/health-and-food-audits-and-analysis_en.
[24] The EU mandates feeding animals after 12 hours, while Brazilian law requires feeding after 24 hours.
[25] European Parliament. (2023). Recent EU-Audits identifying that Uruguayan and Argentinian meat from horses with unreliable sworn declarations and unknown drug history is entering the EU. https://www.europarl.europa.eu/doceo/document/O-9-2023-000054_EN.html.
[26] European Commission. (2022). Dialogues, Art. 3. EU–Mercosur Partnership Agreement. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/f141ad24-71cd-4043-8d1d-728cca9bf841/details.
[27] European Commission. (2022). Annex 2-A, Art. 5(l). *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/d2e28f41-3d58-4516-913c-fb7584410d1e/details.
[28] Eurogroup for Animals. (2021). *The EU sets precedent with the first animal welfare-based condition in a trade agreement*. https://www.eurogroupforanimals.org/news/eu-sets-precedent-first-animal-welfare-based-condition-trade-agreement.
[29] Eurogroup for Animals. (2021). *Ruling confirms strong language is needed in TSD Chapters*. https://www.eurogroupforanimals.org/news/ruling-confirms-strong-language-needed-tsd-chapters.
[30] European Commission. (2022). Sanitary and Phytosanitary Measures. *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/8e389497-7cbd-44e1-a951-aa913344cf7c/details.
[31] European Commission. (2022). *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/5896ba4d-b083-485d-a8d2-62b50264c3b3/details.
[32] World Trade Organization. (2017) *Trade in food and agricultural products, Joint Statement of Undersigned Ministers*, Ministerial Conference Eleventh Session, Buenos Aires, 10–13 December 2017.
[33] European Commission. (2022). Dialogues, Art. 6. *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/f141ad24-71cd-4043-8d1d-728cca9bf841/details.
[34] Institut de l'Élevage. (2023). *The EU-Mercosur Free Trade Agreement, its impacts on Agriculture*. https://www.greens-efa.eu/files/assets/docs/mercosur_en_executive_summary.pdf.
[35] Antimicrobial Resistance Collaborators. (2022). Global burden of bacterial antimicrobial resistance in 2019: a systematic analysis. Lancet, 399(10325), 629–655. https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02724-0/fulltext.
[36] https://openknowledge.fao.org/server/api/core/bitstreams/f9194e44-eeb5-4210-bd00-a1b86b25c501/content.
[37] European Commission. (2022). Dialogues, Art. 5. *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/f141ad24-71cd-4043-8d1d-728cca9bf841/details.
[38] European Commission. (2022). Trade and Sustainable Development. *EU–Mercosur Partnership Agreement*. https://circabc.europa.eu/ui/group/09242a36-a438-40fd-a7af-fe32e36cbd0e/library/63854154-7f3f-45d6-bfe6-53e330818fd0/details.
[39] Instituto Socioambiental. (2023). *Bolsonaro deixa presidência com recorde histórico de desmatamento em Áreas Protegidas.* https://www.socioambiental.org/noticias-socioambientais/bolsonaro-deixa-presidencia-com-recorde-historico-de-desmatamento-em-areas.
[40] European Union. (2023). *Attitudes of Europeans towards animal welfare*. https://europa.eu/eurobarometer/surveys/detail/2996.
[41] European Food Safety Authority. (2023). Animal welfare. https://www.efsa.europa.eu/en/topics/topic/animal-welfare.
[42] Eurogroup for Animals. (2020). *The welfare of broiler chickens in the EU: From science to action*. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_11_19_eurogroup_for_animals_broiler_report.pdf.
[43] Ibid.
[44] See https://betterchickencommitment.com/eu/.
[45] See https://welfarecommitments.com/europeletter/.
[46] Vale, P., Gibbs, H., Christie, M., Florence, E., Munger, J., & Sabaini, D. (2019). The Expansion of Intensive Beef Farming to the Brazilian Amazon. *Global Environmental Change, 57*(101922). https://www.sciencedirect.com/science/article/pii/S0959378018312093?ref=pdf.
[47] Eurogroup for Animals. (2021). *The welfare of cattle finished on feedlots*. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_12_eurogroup_for_animals_cattle_feedlots.pdf.
[48] Reuters. (2022). *Brazil increases feedlots use to meet China importing requirements*. https://www.reuters.com/business/brazil-increases-feedlots-use-meet-china-importing-requirements-2022-04-05/.
[49] Deblitz, C. (2012). *Feedlots: A new tendency in global beef production?* Working Paper 2/2011. Agri benchmark Beef and Sheep Network. https://literatur.thuenen.de/digbib_extern/dn054620.pdf.

[50] Government of Brazil. (2017) *Projeto Pecuária ABC*. https://www.gov.br/agricultura/pt-br/assuntos/sustentabilidade/planoabc-abcmais/projeto-pecuaria-abc/projeto-pecuaria-abc-1.
[51] Eurogroup for Animals. (2021). *The welfare of cattle finished on feedlots*. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_12_eurogroup_for_animals_cattle_feedlots.pdf.
[52] *Ibid*.
[53] *Ibid*.
[54] *Ibid*.
[55] European Commission. (2001). The Welfare of Cattle kept for Beef Production. https://food.ec.europa.eu/system/files/2020-12/sci-com_scah_out54_en.pdf.
[56] *Ibid*.
[57] Colli, M., Dupré, M., & Kpenou, S. (2025). When will imports of meat from animals doped with growth-promoting antibiotics come to an end? Paris: Veblen Institute. https://www.veblen-institute.org/A-quand-la-fin-des-importations-de-viandes-issues-d-animaux-dopes-aux.html.
[58] Eurogroup for Animals. (2021). *The welfare of cattle finished on feedlots*. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_12_eurogroup_for_animals_cattle_feedlots.pdf.
[59] European Union. (2023). *Attitudes of Europeans towards animal welfare*. https://europa.eu/eurobarometer/surveys/detail/2996.
[60] RSPCA Australia. (2025). *What are the animal welfare issues with housing layer hens in cages?* https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-with-housing-layer-hens-in-cages/.
[61] Hartcher, K. M., & Jones, B. (2017). The welfare of layer hens in cage and cage-free housing systems. *World's Poultry Science Journal, 73*(4). https://www.tandfonline.com/doi/full/10.1017/S0043933917000812#d1e144.
[62] RSPCA Australia. (2025). *What are the animal welfare issues with housing layer hens in cages?* https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-with-housing-layer-hens-in-cages/.
[63] EFSA. (2023). *Welfare of laying hens on farm*. https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2023.7789.
[64] Diálogos União Europeia – Brasil. (2019). *Sistemas de Produção de galinhas*. https://eubrdialogues.com/documentos/proyectos/adjuntos/b26c49_X-GUIA-GALINHAS-2019.pdf.
[65] Animal Equality. (2023). Animal Equality Brazil Exposes the Cruelty Behind Your Carton of Eggs. https://animalequality.org/news/brazil-hen-investigation/#:~:text=It%20is%20crucial%20that%20society,the%20lack%20of%20veterinary%20care.
[66] EFSA. (2007). *Animal health and welfare aspects of different housing and husbandry systems for adult breeding boars, pregnant, farrowing sows and un-weaned piglets: Scientific Opinion of the Panel on Animal Health and Welfare*. https://www.efsa.europa.eu/it/efsajournal/pub/572.
[67] Eurogroup for Animals. (2023). *Phasing out cages in the EU: the road to a smooth transition*. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-03/NALB-Phasing out cages-final.pdf.
[68] Animal Equality. (2020). *Organizações pedem o banimento de gaiolas para porcas grávidas*. https://animalequality.org.br/noticia/2020/09/02/organizacoes-pedem-o-banimento-de-gaiolas-para-porcas-gravidas/.
[69] European Union. (2023). *Attitudes of Europeans towards animal welfare*. https://europa.eu/eurobarometer/surveys/detail/2996.
[70] Animal Ethics. *Exploração de porcos*. https://www.animal-ethics.org/exploracao-porcos/.
[71] US Department of Agriculture. (2025). *Soybean Explorer*. https://ipad.fas.usda.gov/cropexplorer/cropview/commodityView.aspx?cropid=2222000.
[72] World Resources Institute. (2025). Data and Methods. https://research.wri.org/gfr/data-methods#deforestation-forest-loss.
[73] Goldman, E., & Weisse, M. (2024). Deforestation Linked to Agriculture. World Resources Institute. https://research.wri.org/gfr/forest-extent-indicators/deforestation-agriculture?utm_medium=blog&utm_source=insights&utm_campaign= globalforestreview#how-much-forest-has-been-replaced-by-soy.
[74] World Resources Institute. (2025). *Data and Methods*. https://research.wri.org/gfr/data-methods#deforestation-forest-loss.
[75] Zalles, V., Hansen, M. C., Potapov, P. V., & Chavez, S. (2018). Near doubling of Brazil's intensive row crop area since 2000. *Proceedings of the National Academy of Sciences, 116*(2). https://doi.org/10.1073/pnas.1810301115.
[76] EU Joint Research Centre. (2024). The Amazon region in 2022 and 2023: deforestation, forest degradation and the risk of growing soy production. https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/amazon-region-2022-and-2023-deforestation-forest-degradation-and-risk-growing-soy-production-2024-02-28_en.
[77] Macedo, M. N., DeFries, R. S., Morton, D. C., & Shimabukuro, Y. E. (2012). Decoupling of deforestation and soy production in the southern Amazon during the late 2000s. *Proceedings of the National Academy of Sciences,* 109(4), 1341–1346. https://doi.org/10.1073/pnas.1111374109.
[78] Eurogroup for Animals. (2022). Trade in animal products fuels deforestation. https://www.eurogroupforanimals.org/files/eurogroupforanimals/2022-06/2022_06_03_efa_pb_Trade in animal products fuels deforestation.pdf.
[79] SEI. (2023). *Trase: Brazilian beef exports and deforestation*. https://www.sei.org/features/trase-brazil-beef-exports-deforestation/.

[80] IPAM Amazônia. (2021). *Pastagem ocupa 75% da área desmatada em terras públicas na Amazônia*. https://ipam.org.br/pastagem-ocupa-75-da-area-desmatada-em-terras-publicas-na-amazonia/.
[81] SEI. (2023). *Trase: Brazilian beef exports and deforestation*. https://www.sei.org/features/trase-brazil-beef-exports-deforestation/.
[82] Ibid.
[83] Greenpeace Brasil. (2021). Carne de destruição: como grandes frigoríficos seguem alimentando o desmatamento e a grilagem na Amazônia. https://www.greenpeace.org/brasil/blog/carne-de-destruicao-como-grandes-frigorificos-seguem-alimentando-o-desmatamento-e-a-grilagem-na-amazonia/.
[84] Fundación Greenpeace Argentina. *Bosques*. https://www.greenpeace.org/argentina/campanas/bosques/.
[85] *Ibid*.
[86] See https://amrcountryprogress.org/.
[87] Norwood, F., & Lusk, J. (2013). Animal Welfare and Food Safety. *Food Safety Magazine*, 1 February. https://www.food-safety.com/articles/4453-animal-welfare-and-food-safety.
[88] *Ibid*.
[89] Bureau of Investigative Journalism. (2019). *Brazil sent 1 million contaminated chickens to the UK in two years*. https://www.thebureauinvestigates.com/stories/2019-07-02/brazil-sent-1-million-contaminated-chickens-to-the-uk-in-two-years/.
[90] Institute for Agriculture and Trade Policy. (2017). *The rise of big meat: Brazil's extractive industry*. https://www.iatp.org/sites/default/files/2017-11/2017_11_30_ExecSummary_English_f.pdf#page=2.
[91] Mercopress. (2019). *Operation Weak Flesh: Brazilian meat packer admits to bribing food inspectors*. https://en.mercopress.com/2019/10/03/operation-weak-flesh-brazilian-meat-packer-admits-to-bribing-food-inspectors.
[92] CNTA. *Ação Direta de Inconstitucionalidade No. 7351*.
[93] Rapid Alert System for Food and Feed. (2020). Annual Report 2019. https://web.archive.org/web/20201101015427/https:/ec.europa.eu/food/sites/food/files/safety/docs/rasff_annual_report_2019.pdf#page=24.
[94] Bureau of Investigative Journalism. (2019). *Brazil sent 1 million contaminated chickens to the UK in two years*. https://www.thebureauinvestigates.com/stories/2019-07-02/brazil-sent-1-million-contaminated-chickens-to-the-uk-in-two-years/.
[95] Baydan, E., Kanbur, M., Arslanbaş, E., Aydın, F. G., Gürbüz, S. & Tekeli, M. Y. (2017). Contaminants in Animal Products. In S. Sekkin (Ed.), Livestock Science. London: InTechOpen. https://www.intechopen.com/chapters/53604.
[96] EFSA. (2023). *The European Union One Health 2022 Zoonoses Report*. https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2023.8442.
[97] Greenpeace. (2023). *A Toxic Cocktail: the EU-Mercosur Deal*, p. 16. https://www.greenpeace.de/publikationen/Report. A Toxic Cocktail. EU-Mercosur Deal.pdf.
[98] Liderança da Bancada do PT na Câmara dos Deputados. (2019). *Agrotóxicos: posição da União Europeia dos Ingredientes Ativos liberados no Brasil*. APublica, 31 July. https://apublica.org/wp-content/uploads/2020/06/agrotoxicos-brasil-ue-jul-2019.pdf.
[99] Gonzales, J. (2020). *Brazil sets record for highly hazardous pesticide consumption: Report*. Mongabay, 12 March. https://news.mongabay.com/2020/03/brazil-sets-record-for-highly-hazardous-pesticide-consumption-report/#:~:text=Brazil%20is%20not%20only%20the,in%20the%20environment%20and%20in.
[100] Food and Agriculture Organization of the United Nations and World Health Organization. (2016). *International Code of Conduct on Pesticide Management: Guidelines on Highly Hazardous Pesticides*. https://openknowledge.fao.org/server/api/core/bitstreams/7c65af6a-52ca-4e44-8c57-4303d076bea4/content.
[101] Pesticide Action Network. (2024). Double standards, double risk: Banned pesticides in Europe's food supply. https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/press-releases/24092024_Double standards%2C double risk.pdf.
[102] World Population Review. (2024). *Pesticide Usage by Country*. https://worldpopulationreview.com/country-rankings/pesticide-usage-by-country.
[103] Food and Agriculture Organization of the United Nations. (2024). Pesticides use and trade 1990–2022. FAOSTAT Analytical Briefs, No. 89. https://openknowledge.fao.org/server/api/core/bitstreams/a8a8c2c8-ee36-42e8-a619-7e73c8daf8a6/content.
[104] UN Special Rapporteur on the right to food. (2022). Report of the Special Rapporteur on the right to food on her mission to Argentina, A/HRC/40/56/Add.3. https://hilalelver.org/resources/country-mission-reports/argentina/.
[105] Pesticide Action Network. Pesticide Use in Europe. https://www.pan-europe.info/issues/pesticide-use-europe.
[106] Food and Agriculture Organization of the United Nations. (2024). *Pesticides use and trade 1990–2022*. FAOSTAT Analytical Briefs, No. 89. https://openknowledge.fao.org/server/api/core/bitstreams/a8a8c2c8-ee36-42e8-a619-7e73c8daf8a6/content.
[107] Ibid.
[108] Observatory of Economic Complexity. Pesticides. https://oec.world/en/profile/hs/pesticides.
[109] Gaberell, L., & Viret, G. (2020). Banned in Europe: How the EU exports pesticides too dangerous for use in Europe. *Public Eye*, 10 September. https://www.publiceye.ch/en/topics/pesticides/banned-in-europe.
[110] United Nations. (2017). Report of the Special Rapporteur on the right to food. https://documents.un.org/doc/undoc/gen/g17/017/85/pdf/g1701785.pdf?OpenElement.

[111] European Environment Agency. (2023). *More action needed in the EU to reduce the impacts of chemical pesticides*. https://www.eea.europa.eu/en/newsroom/news/more-action-needed-in-the-eu.
[112] Stowell, L. (2023). *Pesticides in farmed animal feed*. Faunalytics, 3 October. https://faunalytics.org/pesticides-in-farmed-animal-feed/.
[113] Cabrera, L., & Pastor, P. (2022). The 2020 European Union report on pesticide residues in food. *EFSA Journal*. https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2022.7215.
[114] These categories of product follow EU classification available at the EU's Access2Markets. The category of 'other meat and edible offal' includes the following products: (i) edible offal of bovine and equine animals, pigs, sheep and goats; and (ii) other meat and edible meat offal from: rabbits or hares and other hunted animals; primates; whales, dolphins and porpoises; manatees and dugongs; seals, sea lions and walruses; reptiles; camels and other camelids; domestic pigeons; reindeers; frogs' legs; fatty livers of geese or ducks; and others, including edible flours and meals of meat or meat offal. See https://trade.ec.europa.eu/access-to-markets/en/statistics.
[115] These categories of product follow Mercosur classification available at Sistema de Estadísticas de Comercio Exterior del Mercosur (SECEM). The category of 'other meat and edible offal' resulted from the subtraction of 'chicken meat and edible offal', 'bovine meat and edible offal' and 'equine meat' from the total amount of meat exports (NCM code 02) to the EU. See https://estadisticas.mercosur.int/?language=en.
[116] *Ibid*.
[117] Original amounts available in US dollars at Sistema de Estadísticas de Comercio Exterior del Mercosur (SECEM). See https://estadisticas.mercosur.int/?language=en. Conversions to euros were calculated according to the exchange rate of the European Central Bank on 29 December 2023 (€1 = US$1.105). See https://data.ecb.europa.eu/currency-converter.
[118] Data on the top destinations (according to value in euros) for Mercosur 2023 exports of meats and skins and leather are available at TradeMap.org. See https://www.trademap.org/Country_SelProductCountry_TS.aspx?nvpm=1%7c%7c34%7c%7c%7cTOTAL%7c%7c%7c2%7c1%7c1%7c2%7c2%7c1%7c4%7c1%7c1%7c1. The same information was not available for the volume of exports.

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