

Written evidence submitted by Hop to Save Rabbits (APH0243)

Response Submission to the Environment, Food and Rural Affairs Committee

Subject: Call for Evidence – Priorities for a UK-EU SPS Agreement

Submitted by: Hop to Save Rabbits

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Summary

Hop to Save Rabbits is a UK-based charity advocating for improved welfare protections for rabbits, Britain's third most popular companion animal. Our submission focuses on the risks posed by including rabbit meat within the proposed UK-EU Sanitary and Phytosanitary (SPS) Agreement.

We recommend that rabbit meat be excluded from SPS alignment to preserve the UK's ability to legislate for higher welfare and public health standards. Documented zoonotic risks, welfare breaches, and inconsistencies with public values support this position. We further note the need for fiscal clarity in VAT and customs.

Introduction

Hop to Save Rabbits is a UK-based charity dedicated to improving the welfare and protection of rabbits. Despite their popularity as companion animals, rabbits continue to be farmed and consumed in ways that fall below public expectations and veterinary understanding.

We advocate that the UK should retain the right to prohibit the farming, importation, and consumption of rabbit meat for both human and animal use. This position is grounded in public health, animal welfare, and fiscal transparency.

We welcome the opportunity to respond to the Committee's Call for Evidence on the proposed UK-EU SPS Agreement. Our submission addresses the Committee's questions with particular focus on implications for public health, animal welfare, and regulatory autonomy.

Question 1: What is a realistic timeline for the negotiation and implementation of an SPS agreement?

A realistic timeline would be 18–24 months, allowing for:

- Parliamentary scrutiny of alignment provisions
- Engagement with devolved administrations
- Impact assessments on trade, biosecurity, and welfare

It is essential that ethical and health considerations, such as species-specific protections, are not overlooked in the pursuit of trade facilitation.

Question 2: What opportunities and risks are posed by the introduction of dynamic regulatory alignment with the EU?

Dynamic alignment risks entrenching lower EU standards for farmed rabbits, as there is no species-specific EU legislation. This permits caging systems that restrict natural behaviours and increase susceptibility to disease, with implications for food safety and consumer trust.

Opportunities exist if the UK retains the right to legislate independently. Under **retained UK law, including the Animal Welfare Act 2006 and related secondary legislation**, Parliament remains free to legislate beyond EU standards. This should include the ability to exclude or prohibit rabbit meat.

We recommend:

- Excluding rabbit meat from SPS harmonisation.
- Recognising ethical and health divergence as legitimate grounds for exception.
- Preserving the UK's ability to legislate up to and including a prohibition on rabbit meat.

Question 3: How should traders, producers, businesses and policymakers prepare in sectors where regulatory divergence already exists or may emerge?

For rabbit farming, divergence should be managed to facilitate an orderly phase-out. Preparations could include:

- A review of rabbit farming practices under Section 9 of the Animal Welfare Act 2006.
- Licensing reform and mandatory welfare audits.
- Consultation on reclassification of rabbits within food and feed law.

Rabbit meat presents documented public health risks:

- **Hepatitis E:** Associated with undercooked rabbit meat; particularly hazardous for transplant patients and pregnant women.¹
- **Encephalitozoon cuniculi:** A parasite transmissible from rabbits to humans, particularly immunocompromised individuals (Royal (Dick) School of Veterinary Studies).²
- **Tularemia:** A bacterial zoonosis linked to handling and consumption of rabbits.

These risks provide a strong case for divergence and precautionary exclusion.

Question 4: How should the UK Government engage with industry stakeholders and devolved administrations?

Engagement should extend beyond traditional industry stakeholders to include veterinary bodies, animal welfare experts, and feed manufacturers. We recommend:

- Establishing a cross-sector working group on species-specific welfare in food policy.
- Consulting devolved administrations on reclassification of rabbits in food and farming law.
- Ensuring rabbit meat is excluded from feed supply chains, consistent with the Feed Hygiene Regulation (EC No 1831/2003).

Hop to Save Rabbits is willing to contribute evidence and expertise to such discussions.

Question 5: What could the implications of an SPS agreement for trade and border controls be?

Excluding rabbit meat from SPS alignment would:

- Simplify border protocols by removing a niche but contentious product.

¹ [Detection of Hepatitis E Virus in Rabbits and Rabbit Meat from Slaughterhouses in Hebei Province of China - PubMed](#)

² <https://www.dechra.co.uk/companion-animal/exotics/e-cuniculi>

- Reduce biosecurity risks associated with zoonotic disease and feed contamination.
- Prevent reputational damage to UK food standards.

A history of cruelty, despite public awareness, continues both in the UK and across the EU.

Despite changes in the law, a tide of cruelty persists, bringing with it heightened risks of disease.

Investigations have documented welfare and compliance breaches in rabbit farming, including cannibalism, untreated infections, and poor hygiene (Animal Equality 2014³; The Independent 2021⁴; CIWF 2023⁵). These raise SPS-relevant concerns about animal health and food safety.

Question 6: How might an SPS agreement affect the UK’s internal market, particularly considering regulatory divergence across the devolved nations?

Current regulation of rabbit meat is inconsistent across the UK. An SPS agreement must not constrain devolved administrations from introducing higher welfare standards or prohibitions. We recommend:

- Recognising rabbits as companion animals under devolved food law.
- Allowing devolved governments to restrict or prohibit rabbit meat production and sale.
- Ensuring internal market rules do not override ethical and health-based divergence.

Question 7: What impact could the proposed SPS agreement have on upcoming Defra agri-food and environmental strategies?

The SPS Agreement should reinforce, rather than undermine, national strategies such as:

- **The UK Food Strategy:** Rabbit meat fails to meet its objectives on safety, sustainability, and public confidence.
- **The Farming Roadmap:** Ethical exclusions can stimulate innovation and consumer trust.
- **The Land Use Framework:** Intensive rabbit farming is incompatible with sustainable land use and biodiversity goals.

Exclusion of rabbit meat would align with these strategies and demonstrate UK leadership in ethical and health-based food policy.

VAT and Tax Implications of SPS-Aligned Trade

An SPS Agreement would reduce regulatory barriers for agri-food trade, including documentation and routine border checks. This has secondary implications for VAT, customs, and fiscal transparency:

- **VAT treatment:** SPS alignment may increase trade volumes; HMRC should provide clear guidance on VAT accounting for mixed consignments.
- **Customs valuation:** Simplified SPS procedures may affect how goods are valued at the border, with consequences for duty calculations.
- **Product classification:** If rabbit meat is excluded from SPS alignment, it must also be assigned a distinct customs code and VAT treatment to prevent misclassification.

We recommend:

³ <https://animalequality.org/news/2014/05/23/new-undercover-investigation-reveals-cruelty-inside-rabbit-farms-linked-to-the-uk/>

⁴ <https://www.independent.co.uk/news/uk/home-news/rabbit-fur-meat-farm-animal-cruelty-b1926678.html>

⁵ <https://www.ciwf.com/media-and-news/news/cruelty-expose-reinforces-crucial-need-for-eu-cage-ban/>

1. HMRC issue updated VAT guidance for agri-food traders under the SPS framework.
2. Rabbit meat be explicitly coded and treated to reflect ethical and health-based exclusions.
3. Fiscal transparency and product labelling provisions be incorporated into the SPS Agreement.

Conclusion

Hop to Save Rabbits urges the Committee to ensure that the UK-EU SPS Agreement preserves the UK's legal right to legislate beyond EU standards under retained law, including the Animal Welfare Act 2006. This includes retaining the option to exclude or prohibit products such as rabbit meat.

Such an approach would:

- Reflect public values and veterinary evidence.
- Reduce zoonotic and food safety risks.
- Provide fiscal and regulatory clarity.
- Uphold the UK's reputation as a global leader in ethical and science-based food policy.

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