

Briefing note for EFRA Committee Members

Date: 16 February 2026

Farming Profitability Review — rabbits as a “gap species” in welfare and undercutting risk Stakeholder note from Hop to Save Rabbits

Executive summary

This submission responds to the **Farming Profitability Review (Baroness Batters, December 2025)** and ongoing EFRA scrutiny of **import standards, supply chain fairness and fair competition in agriculture**. Rabbits are often omitted from species-specific welfare delivery and trade transparency measures unless named explicitly. This creates a practical **fair-competition risk**: rabbit products can enter supply chains without method-of-production visibility, limiting the ability of consumers and buyers to distinguish welfare standards and increasing the likelihood that lower-welfare systems undercut responsible production. This note summarises the exposure and proposes proportionate measures to improve transparency, coherence and enforceability.

1) Why rabbits are a “gap species” relevant to profitability and fairness

Rabbits move between more legal and operational contexts than most species: companion ownership, commercial breeding and sales (including online), wildlife control and rehabilitation, farmed/import supply chains, and regulated research. Each context triggers different duties, regulators and enforcement expectations—so welfare outcomes can change sharply with classification even though sentience and vulnerability do not.

In practice, this fragmentation creates:

- **policy blind spots** (rabbits not consistently named in scope, delivery plans or enforcement guidance);
- **weak transparency signals** (buyers and consumers cannot reliably distinguish welfare standards); and
- **uneven incentives** (responsible practice is harder to sustain where lower-welfare supply can undercut price).

2) Undercutting risk: why it is credible and measurable

Rabbit products sit in trade categories that can group rabbits with hares and do not capture welfare-relevant information (for example housing system or method of production). Imports can therefore enter the UK market with no routine, consumer-facing way to identify lower-welfare confinement systems. This reduces the market’s ability to reward higher-welfare practice and can discourage investment in improved systems.

To illustrate order of magnitude, the UK imported **approximately 513 tonnes** of rabbit/hare meat and edible offal under **HS 020810** in 2023. Using standard yield assumptions, that is indicative of **approximately 320,000–430,000 animals**, with a central estimate of around **370,000 animals-equivalent**.

Basis: this animals-equivalent estimate is calculated using an indicative average carcass/dressed-weight range of **~1.2–1.6 kg per rabbit** (figures are indicative and intended for scale, not precision). Regardless of the exact number, the key point for scrutiny is that a material traded volume can enter without method-of-production visibility.

3) Welfare and public confidence: why this is a market issue

Commercial rabbit meat production in many jurisdictions remains predominantly confinement-based. Published welfare assessments and third-sector reporting commonly highlight risks associated with intensive cage systems, including restricted movement, hygiene issues in stacked housing, and elevated mortality in some intensive settings. Where these risks are not visible to buyers at point of purchase, consumer trust is exposed and “race-to-the-bottom” pricing pressure can prevail.

There is also a policy-coherence issue: England’s sentience-led direction (including movement away from confinement systems) sits uneasily with a rabbit market in which confinement can remain the default, while transparency measures remain limited.

4) Practical, low-burden measures for EFRA scrutiny

These measures are intended to be proportionate, enforceable and aligned with fair competition:

A. Scope clarity (prevent omission by default)

Ask Defra to confirm, in writing, how rabbits (and, where relevant, hares) are being explicitly included in welfare, enforcement and trade-related delivery work where category boundaries risk exclusion.

B. Method-of-production transparency

Ask Government to set out what is planned (and what is ruled out) on method-of-production or equivalent transparency for rabbit products, including how any approach would apply to imports and mixed supply chains.

C. Imports and farming options appraisal (anti-undercutting)

Ask Defra to publish an options appraisal covering: (i) routes to phase out barren cage systems domestically (where applicable); (ii) strengthened traceability and minimum information requirements; and (iii) trade-compatible sequencing for welfare-based import pathways (designed to be robust and consistent with WTO rules and the UK–EU TCA).

D. Safeguards through trade and procurement

Ask how Government will prevent higher-welfare producers and supply chains being undercut by lower-welfare systems, including through public procurement guidance and buyer-facing transparency.

E. Annual “lagomorph dashboard” for Parliament

Ask Defra to publish a minimal annual reporting set spanning imports/supply chains and key lagomorph welfare indicators, enabling Parliament to track delivery year on year.

5) Targeted scrutiny questions EFRA could ask Ministers

- **Undercutting risk:** What assessment has Defra made of welfare-undercutting risk for rabbit products entering the UK, given the lack of method-of-production visibility in trade data?
- **Transparency:** What is the Government's position on method-of-production (or equivalent) transparency for rabbit products, and how would this apply to imports and mixed supply chains?
- **Options appraisal:** Will Defra commission and publish an imports and farming options appraisal for rabbits, including a trade-compatible sequencing plan for welfare-based import measures?
- **Implementation by default:** How will Government ensure rabbits are not omitted from implementation when policy is structured by administrative category rather than species?
- **Reporting:** What minimum annual reporting will Parliament receive to track rabbit/lagomorph welfare outcomes and import exposure?

References

- WITS / UN Comtrade (HS 020810 imports by country, includes UK 2023 quantity):
<https://wits.worldbank.org/trade/comtrade/en/country/ALL/year/2023/tradeflow/Imports/partner/WLD/product/020810>
- UK Trade Info (HS 020810 definition page):
<https://www.uktradeinfo.com/commodities/020810>
- FAO carcass composition / slaughter yield tables page:
<https://www.fao.org/4/x5082e/X5082E04.htm>
- CIWF "Welfare of growing rabbits – summary" (PDF):
<https://www.compassioninfoodbusiness.com/media/7458147/welfare-of-growing-rabbits-review-2024.pdf>
- EFSA Journal opinion (2020; 18(1):5944):
<https://efsa.onlinelibrary.wiley.com/doi/10.2903/j.efsa.2020.5944>