SHELL SHOCKED

Report on the risks posed by imported eggs to the UK – economic, food safety, and animal welfare

British Lion Eggs

INTRODUCTION

The UK egg sector has spent decades building public trust in egg safety, primarily through the British Lion Quality Code of Practice. However, imports of eggs produced to lower quality standards risk undermining this progress. Such imports may expose the British public to potential risks, including Salmonella, chemical residues, and eggs produced in conventional 'battery' cages, while also placing domestic producers at a competitive disadvantage.

The UK Government has continued to willingly sign up to trade agreements that permit the import of eggs produced to lower food safety and animal welfare standards than those required in the UK. Most recently, the Government extended Ukraine's tariff-free access to the UK market.

According to Government data, imported egg volumes are rising significantly, with the majority of these eggs entering wholesale, foodservice and food manufacturing supply chains, including the public sector.

Public health professionals, including highly respected food safety experts Dr Lisa Ackerley and Sterling Crew, alongside industry bodies such as the British Egg Industry Council (BEIC) and National Farmers Union (NFU) have repeatedly warned that imported eggs often fail to meet the same hygiene, traceability and welfare standards as British eggs. A recent survey of Chartered Institute of Environmental Health members found that 82% of respondents believe imported eggs pose a greater food safety risk in professional kitchens.

Concern has also been raised by MPs from across the political spectrum, including Claire Hazelgrove, Amanda Hack, Ruth Jones, and Sarah Champion, regarding both hen welfare and food safety gaps associated with imported eggs.

Evidence suggests that consumers are increasingly aware of these issues. Imported eggs and UK standards consumer research, undertaken by Obsurvant (02.2026 / 2,007 respondents), indicates strong public support for imported eggs to meet the same food safety and hen welfare standards as practised in the UK, reflecting concern that British producers adhering to high standards are being undercut by cheaper imports produced to lower quality and hen welfare standards. A petition calling for British eggs to be used for British-made foods recently generated more than 50,000 signatures.

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EXECUTIVE SUMMARY

Eggs are a vital component of the UK farming and food system, providing an accessible, high-quality source of natural nutrition for consumers nationwide. Their versatility and value make them integral to products ranging from everyday breakfasts to bakery goods and prepared foods.

The British Lion Code of Practice, overseen by the British Egg Industry Council and operating independently of Government, provides world-leading standards for food safety and traceability alongside animal welfare and the environment. These standards ensure that eggs can be safely consumed runny, including by vulnerable groups, as endorsed by the Food Standards Agency. Since the launch of the British Lion Code of Practice in 1998, consumer trust in eggs has been steadily restored. Sales have increased significantly, with per-capita consumption rising from around 160 eggs per year in 2004 to more than 200 in 2025 - equivalent to an increase of more than four billion eggs. It represents a true British farming success story.

However, rising imports of eggs from countries with lower production standards including Poland and particularly Ukraine, a country in which conventional 'battery' cage systems (banned in the UK since 2012) remain in use, risk undermining the integrity of the British egg market and raise significant food safety, economic, ethical and reputational concerns.

This report analyses the volume of eggs and egg products imported into the UK; documented food safety incidents and fraud associated with eggs and egg products produced overseas; gaps in standards and weaknesses in import controls; and the economic, food safety and ethical implications for British producers, consumers and businesses. It also assesses political support and public opinion on prioritising UK-produced eggs and egg products. The evidence clearly demonstrates the need for the UK Government to ensure that imported eggs and egg products meet the same standards required under the British Lion Code of Practice in order to safeguard consumer confidence, protect domestic producers, and uphold food safety and hen welfare standards.

> *The UK Government has created an open door for dumping battery cage eggs produced to standards far below those required of British eggs.*
>
> **Nick Allen, Chief Executive, British Egg Industry Council**

14 BILLION +
eggs consumed annually in the UK

1.6 BILLION
eggs imported annually (up from 1bn)

ASSESSING IMPORTS

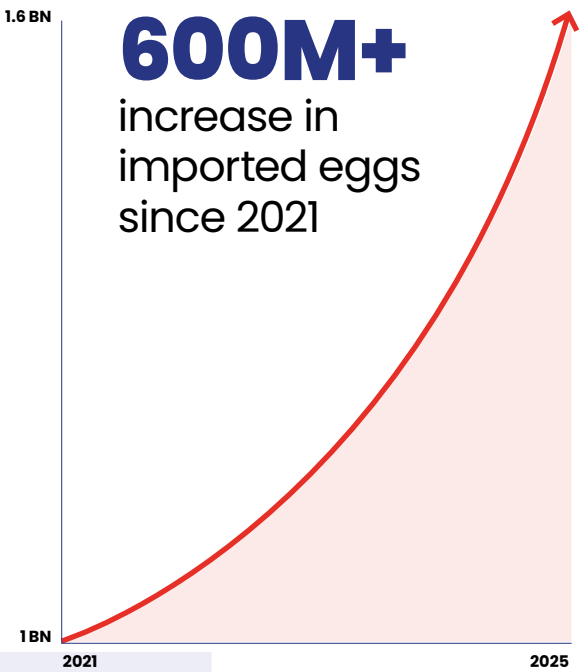
2.1 RAPID GROWTH IN IMPORTED EGGS

Conservative industry estimates note a 60% rise in the volume of imported eggs to the UK since 2021, from 1 billion to 1.6 billion eggs – an increase of more than 600m eggs.

This significant growth, driven largely by supply from Ukraine and Poland, has the potential to reshape purchasing patterns across UK supply chains. Ongoing cost pressures are pushing some foodservice operators and manufacturers toward cheaper imported products. However, those lower prices can come with trade-offs, as imported eggs do not always meet the UK's established standards for food safety, traceability and animal welfare. For example, most eggs produced in Ukraine come from conventional 'battery' cage systems, which have been banned in the UK since 2012. This system, which enables a much higher number of birds to be housed within a smaller space, ensures greater profitability but much lower welfare standards. British farmers have invested around £400m to move towards more welfare friendly production systems.

The scale and speed of this rise in imports raises concerns for any business focused on maintaining high production standards, supply chain resilience and long-term food security.

Current HMRC data for 2025 also shows a large increase in imports but the data is being reviewed for accuracy.



2.2 UKRAINE

Ukraine gained tariff free access to the UK for eggs and egg products, among other items, in May 2022 under the UK Ukraine Free Trade Agreement.

Initially scheduled to run until March 2026, this duty free access has since been extended to March 2028, allowing Ukrainian eggs to continue entering UK markets without tariffs.

In 2025, reports state Ukrainian egg producers exported 2.05 billion eggs, a 65.6 % rise compared with 2024. This strong growth was reflected across major European markets, with the EU accounting for around 73 % of total export volumes.

8 MILLION

kilos of eggs imported from Ukraine in early 2025

Surge in shipments to the UK

According to data from the Animal and Plant Health Agency, Ukraine became one of the largest suppliers of eggs to the UK in 2025, shipping around 8 million kilograms of eggs in the first part of the year, more than supplies from Poland and Spain. The number of individual egg consignments entering the UK also grew from roughly 3,500 in 2023 to over 10,000 in 2024.

65.6% RISE

in Ukrainian exports in 2025 compared to 2024

Egg exports driving domestic price inflation

The rapid growth in Ukrainian egg exports has also had implications for its domestic market. As European demand has strengthened, reports in the media and Ukrainian Government backed website *Ukraine Open for Business,* indicate that major Ukrainian egg producers prioritised higher-value export destinations such as the UK and Spain. As a result, domestic supply has tightened and retail egg prices in Ukraine rose sharply, increasing by close to 50% by mid-2025.

While tariff-free access to the UK market was intended to support Ukraine's economy, reports suggest the benefits may be concentrated among large egg producers seeking foreign currency, while Ukrainian consumers have faced rising prices and increasing pressure on domestic food affordability.

QUANTIFYING THE RISK

FOOD SAFETY & FRAUD INCIDENTS IN EUROPEAN EGG MARKETS

In recent years, European egg markets have been consistently impacted by food safety failures, chemical contamination, fraudulent labelling, illegal animal welfare practices, and traceability breakdowns, affecting both shell eggs and egg ingredients.

These incidents illustrate some of the risks inherent in importing eggs and egg ingredients from jurisdictions with weaker regulatory enforcement.

Data recorded on the European Union's Rapid Alert System for Food (RASFF) show incidents including:

- Salmonella
- Illegal chemical treatments entering the food chain
- Veterinary drug residues detected in eggs
- Fraudulent free-range and organic labelling
- Country-of-origin misrepresentation
- Processed egg ingredient contamination
- Date stamping and traceability failures
- Cross-border multi-country outbreaks linked to egg supply chains

> *Imported eggs from certain countries simply do not meet the standards that the British public expects. They are a real risk to consumer safety and to our farmers' livelihoods.*
>
> **Nick Allen, Chief Executive, British Egg Industry Council**

3.1 Food Standards Agency risk profile: imported eggs and egg products, 2024

In 2024, the UK Food Standards Agency (FSA) conducted a risk profile for imported eggs and egg products, with some stark findings.

The FSA highlighted that imported eggs and egg products can carry a range of microbiological hazards, with non typhoidal Salmonella , including Salmonella Enteritidis and Salmonella Typhimurium, being the most frequently reported.

Chemical contaminants and residues, including veterinary medicines and biocides, have also been identified. These hazards underline the importance of rigorous sourcing, traceability and hygiene controls for imported products.

The assessment also highlighted that liquid eggs, including whole and separated eggs, remain vulnerable to microbiological contamination during production, transport and storage. Imported liquid egg ingredients can carry Salmonella, and strict hygiene, traceability and temperature controls are essential to mitigate risk.

The FSA also said that dried and processed egg products do not inherently eliminate hazards. Contamination with Salmonella or chemical residues can occur before or during processing, particularly when sourced from multiple countries with varying control measures.

3.2 RASFF egg and egg product notifications 2020 – 2025

RASFF is the European Union's Rapid Alert System for Food and Feed and is used by Member States and the European Commission to record and share information about serious risks detected in food or feed, including contaminated eggs and egg products. An analysis of RASFF data supports the FSA review, showing consistent issues with eggs and egg products.

EU egg and egg product risk notifications between 2020 - 2025				
	OVERALL NUMBER	SALMONELLA INCIDENTS	SHELL EGG INCIDENTS	EGG PRODUCTS INCIDENTS
2020	21	14	6	8
2021	12	9	8	1
2022	10	7	2	5
2023	19	12	9	3
2024	34	26	17	9
2025	15	13	11	2
TOTAL	**111**	**81**	**53**	**28**

Salmonella dominates the notifications, accounting for 73% of the total. The remaining notifications include unmarked eggs[1], coccidiostat residues, antibiotic residues, presence of wormers, fipronil, dioxins, mould and more.

A major control vulnerability with the food safety credentials of EU egg products is the processing of egg from Salmonella-positive flocks, which is not permitted under the British Lion Code of Practice. The report of the Advisory Committee on the Microbiological Safety of Food "An update on the microbiological risk for shell eggs and their products' (June 2016) stated: "1.69. In the mainland UK, eggs from positive flocks are not diverted to processing into egg products, whereas in many other EU countries this is normal practice, therefore the risk from domestically produced egg products will be lower".

The deliberate introduction of eggs from infected flocks into processing facilities also raises significant food safety concerns.

A recent study[2] has found that inadequate processing of contaminated eggshells before their use in poultry feed was probably contributing to the length and spread of a large-scale Salmonella outbreak in the Netherlands.

Egg whites can also present a higher food safety risk, as they are typically heat-treated rather than fully pasteurised. This is because the time and temperatures required to achieve full pasteurisation would compromise the functional properties of the egg white.

The British Lion Code sets specific time and temperature requirements as an additional control measure. Equivalent detail is not specified in the EU standards. Reflecting this risk, several notifications relating to Salmonella-positive egg white have been recorded in the EU's RASFF.

1 Commission directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1997/74/EC requires; the Producer Establishment Number on every egg shell – country, type of farming system, farm code | 2 The role of contaminated eggshells used in poultry feed in a diffuse nationwide outbreak of Salmonella Enteritidis, the Netherlands, 2023 to 2025

3.3 TIMELINE OF RECENT NOTABLE ISSUES RELATING TO EGGS & EGG PRODUCTS

The following chronology groups notable incidents by issue type.

Shell egg issues

SALMONELLA — SHELL EGG OUTBREAKS & RECALLS

1. **2016: Multi-country European salmonella outbreak**
Issue type: Salmonella
Countries affected: Poland Belgium, Denmark, Luxembourg, Netherlands, Norway, Sweden, UK

Eggs traced to a Polish egg packing centre caused widespread cross-border infections.

2. **2021–2022: Spain-linked multi-country salmonella outbreak**
Issue type: Salmonella
Countries affected: Spain, France, Netherlands, UK, Scandinavia

A major ongoing Salmonella outbreak linked to Spanish eggs resulted in 272 cases, 25 hospitalisations, and 2 deaths. Contaminated eggs were reportedly diverted to processing rather than be destroyed.

3. **2023-2025: Netherlands Salmonella outbreak linked to contaminated feed**
Issue type: Salmonella

Outbreak linked to eggshells from Salmonella positive flocks inadequately treated before being added to poultry feed. The outbreak, which began in the first half of 2023, resulted in 151 cases in 2023, 27 in 2024, and 31 in 2025.

4. **2024: Poland - Salmonella outbreak linked to eggs exported to UK**
Issue type: Salmonella
Countries affected: UK

More than 200 cases of Salmonella reported linked to eggs imported from Poland to the UK. The FSA warned food businesses about using Polish eggs.

FSA Head of Incidents Tina Potter stated:
"Food businesses must maintain rigorous hygiene and sourcing practices, particularly when using imported products."

5. **2024: Sweden - major retail Salmonella egg recall**
Issue type: Salmonella

Major Swedish retailers ICA, Axfood and Lidl recalled eggs after salmonella detection in production environments.

6. **2024-2025: Sweden ongoing Salmonella recall linked to Ukrainian imports**
Issue type: Salmonella

Salmonella detected in eggs imported from Ukraine in 2024. Swedish officials continued to investigate Salmonella outbreaks linked to eggs from Ukraine through 2024 and 2025, with more than 100 cases recorded.

7. **2024: France – major Salmonella egg outbreak and recall (c. 3m eggs)**
Issue type: Salmonella

Millions of eggs were recalled across French distribution networks and 100 illnesses were recorded due to Salmonella contamination.

8. **2025: France - major Salmonella egg outbreak and recall (c.500,000 eggs)**
Issue type: Salmonella

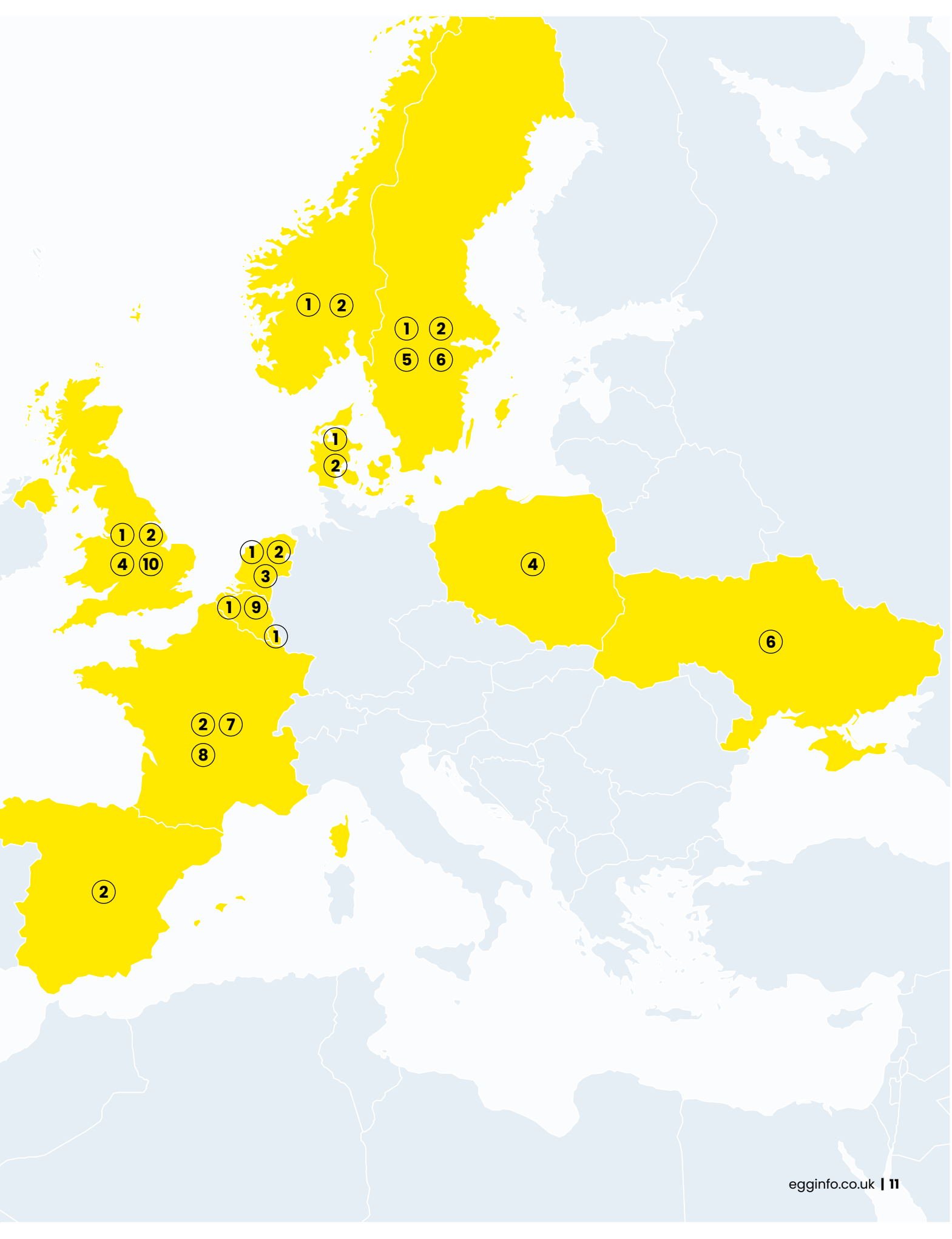
500,000 eggs recalled across four major French retailers.

9. **2025: Belgium - Salmonella egg outbreak linked to laying farm**
Issue type: Salmonella

A Salmonella outbreak traced to a Belgian farm was identified as the cause of illness for 67 people who were recorded being taken ill.

10. **2025: UK – Salmonella egg outbreak linked to imported egg distributor**
Issue type: Salmonella

123 confirmed illnesses linked to a single imported egg distributor were reported between May – October 2025.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CHEMICAL CONTAMINATION & RESIDUE INCIDENTS

11 2017: Belgium and Netherlands – Fipronil chemical contamination scandal
Issue type: Illegal chemical use / contamination / fraud concealment
Countries affected: Belgium, Netherlands, Germany, France, UK and others

A major European-wide food scandal erupted when eggs were found contaminated with fipronil, a veterinary insecticide prohibited for use in food-producing animals.

A pest control company had illegally applied the substance in laying hen houses on the continent. Contaminated eggs entered retail and processed food supply chains across Europe.

Tens of millions of eggs withdrawn and hundreds of processed food lines recalled (sandwiches, salads, baked goods, sauces, egg ingredients). Criminal prosecutions followed. It is estimated that the recalls cost €150 million and affected 24 EU countries and 40 in total.

UK FSA statement at the time:
"The FSA is committed to ensuring that food is safe, and that UK consumers have food they can trust."

12 2025: Ukraine – banned antibiotic residues detected in exported eggs
Issue type: Veterinary drug residues
Countries affected: Poland, Slovakia, Netherlands, Latvia (RASFF alerts)

Multiple RASFF alerts reported banned antibiotic residues (nitrofuran metabolite) in Ukrainian eggs entering EU trade channels impacting various countries.

French Agriculture Minister Anne Genevard warned:
"Eggs from Ukraine containing banned residues and produced in illegal cage systems threaten both consumer safety and market integrity. Stronger border controls and potential prohibitions are necessary."

RECENT FRAUD AND MISLABELLING CASES

13 2019: Netherlands – cage eggs sold as free range
Issue type: Fraud / misrepresentation

Trader prosecuted for falsifying producer codes and selling caged eggs as free-range. €30,000 fine.

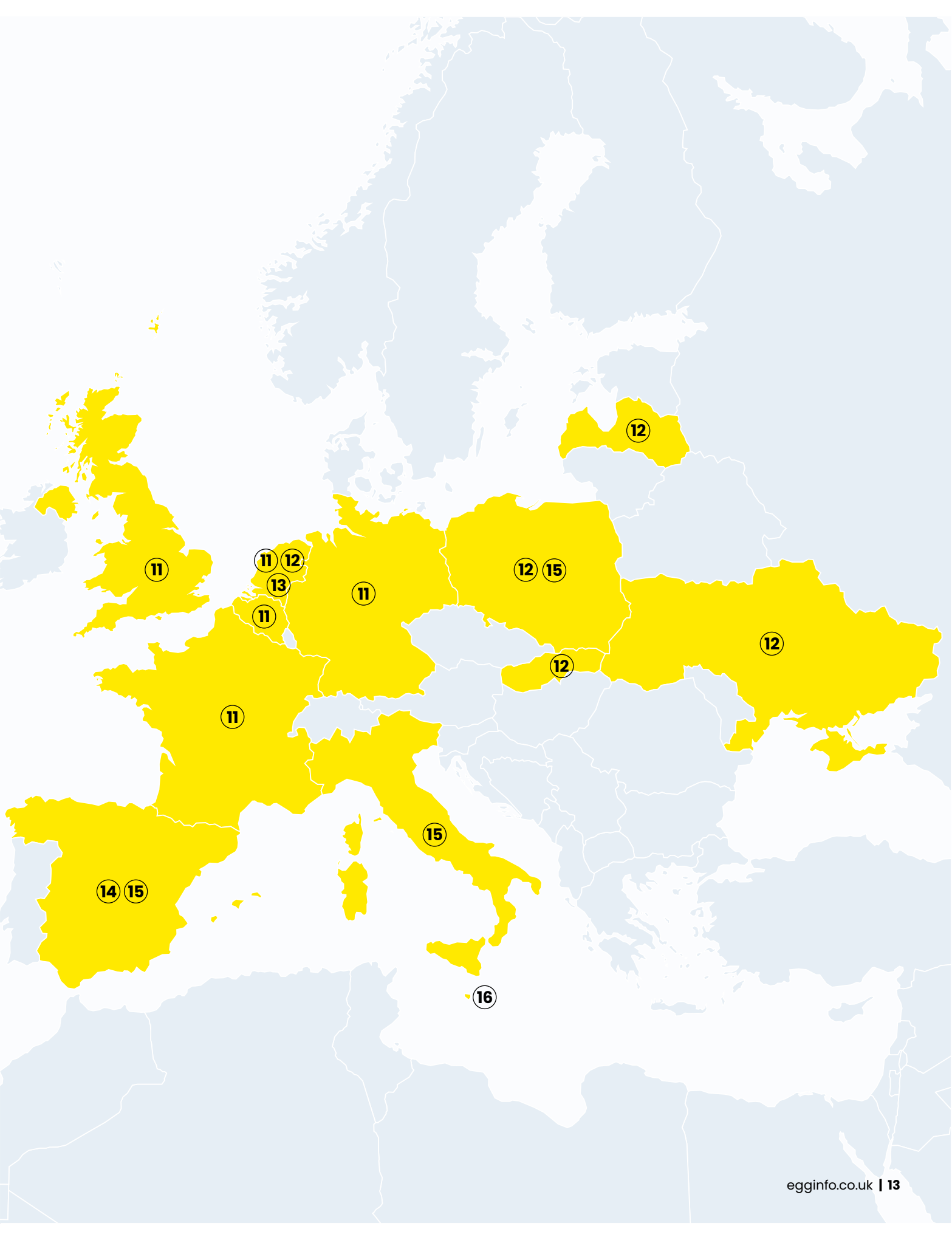
14 2021: Spain – free range mislabelling
Issue type: Production system mislabelling
Eggs from cage systems marketed as free-range.

15 2020: Italy – origin fraud (imported eggs sold as Italian)
Issue type: Country-of-origin fraud
Countries affected: Poland, Spain, Italy

Authorities seized circa three million eggs from Poland and Spain relabelled as Italian, falsely marketed as domestic premium product.

16 2025: Malta – incorrect date stamping on imported Ukrainian eggs and mixing with domestically produced eggs
Issue type: Incorrect best-before/date stamping

Warning and recall notice issued.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EGG INGREDIENT INCIDENTS

17 2017: Fipronil ("Egg Gate") chemical contamination scandal
Issue type: Chemical contamination / food fraud
Countries affected: Belgium, Germany, France, Netherlands, UK and others

Illegal use of the insecticide fipronil in laying hens in Belgium and the Netherlands led to millions of eggs, egg products and foods containing egg (powders, liquid egg, bakery mixes, mayonnaise, ready meals) being recalled across Europe and the UK.

18 2018: Barn Farmed Liquid Egg White Salmonella outbreak
Issue type: Salmonella contamination (liquid egg ingredient)
Countries affected: UK, France and Spain

Salmonella Enteritidis in imported liquid egg white sourced from France (using Spanish eggs) caused seven confirmed human cases in the UK. FSA issued a precautionary recall.

19 2021–2025: Spain egg ingredient recalls
Issue type: Salmonella contamination / mislabelling

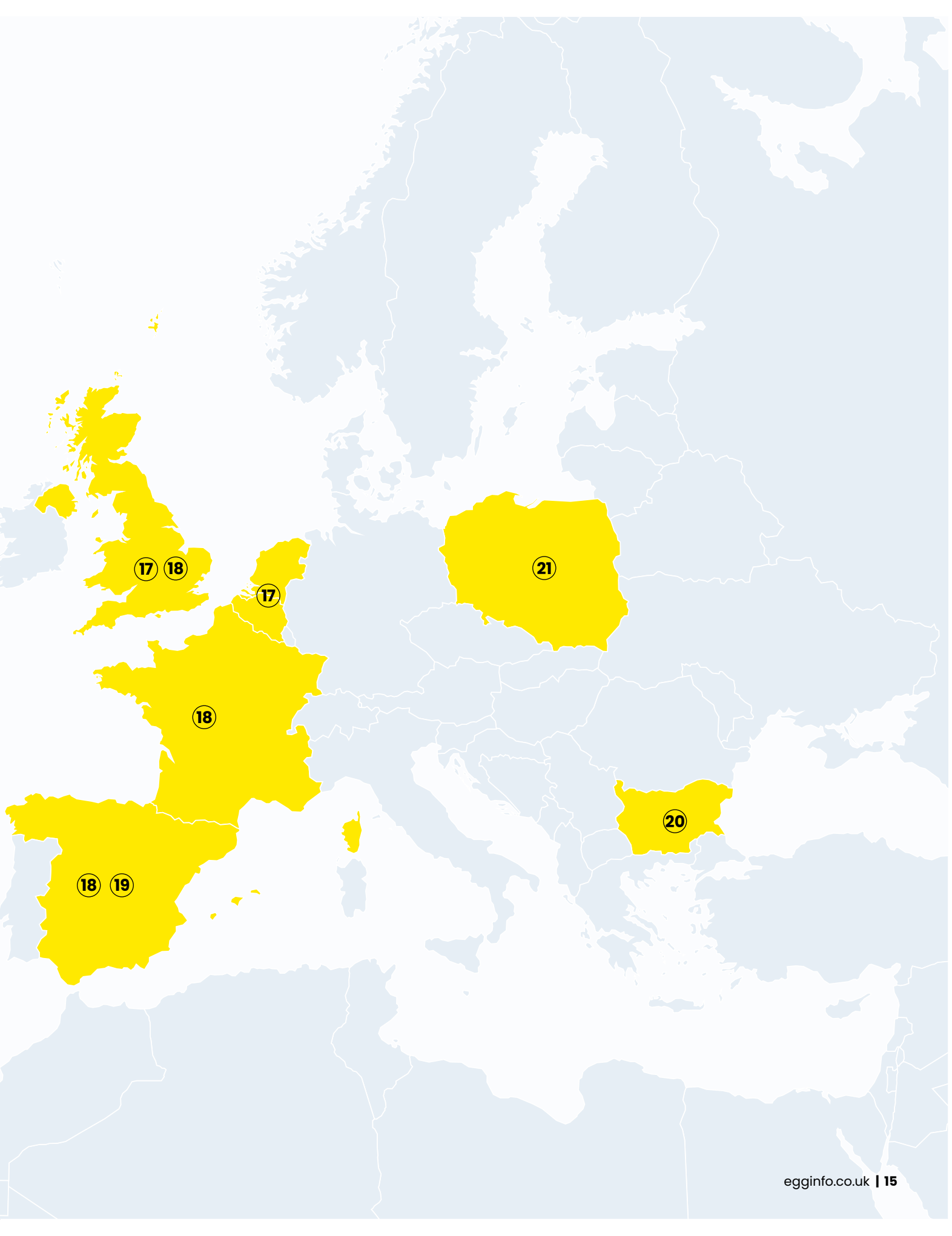
Multiple incidents involving egg powders, liquid eggs and bakery mixes linked to Salmonella and mislabelling. Products destined for EU and UK markets were recalled; international alerts issued via RASFF.

20 2022: Whole egg powder Salmonella contamination (Bulgaria)
Issue type: Microbiological contamination (egg powder)

Salmonella Enteritidis detected in Bulgarian whole egg powder led to withdrawal from EU supply chains.

21 2025: Whole egg powder Salmonella contamination (Poland)
Issue type: Microbiological contamination (egg powder)
Countries affected: EU

Whole egg powder exported from Poland tested positive for Salmonella, triggering an EU RASFF alert.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3.4 INCIDENTS OUTSIDE EUROPE

Outside the EU, including Ukraine, the picture is equally concerning for countries trading directly or indirectly with the UK.

22 2025 – Egg antibiotic residue investigation (nitrofuran concerns) in India

In late 2025, India's Food Safety and Standards Authority of India (FSSAI) initiated nationwide testing of eggs for banned antibiotic residues (nitrofurans) following public allegations about their presence.

23 2025 – Liquid egg product recall (Chemical Contamination) in USA

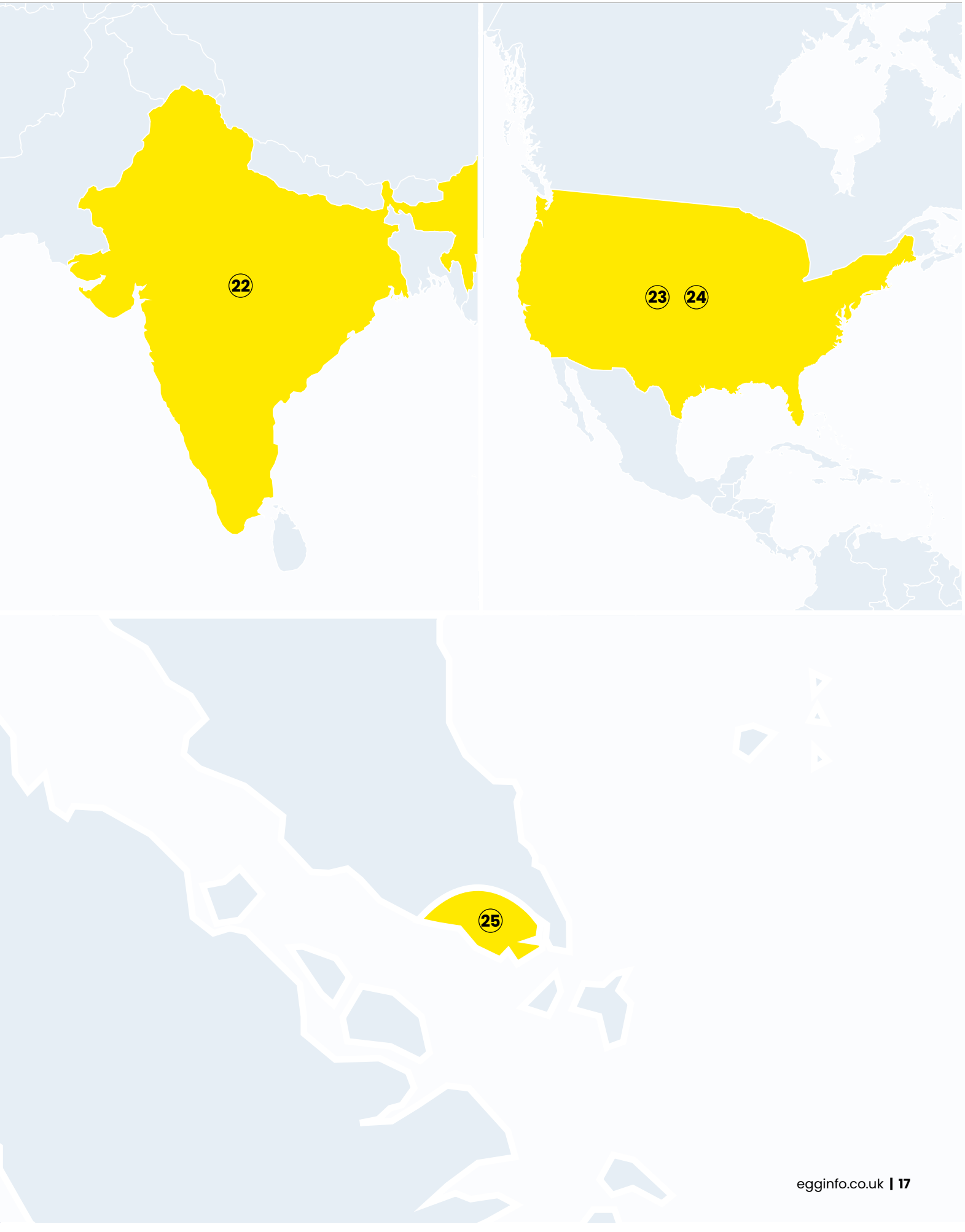
Cargill Kitchen Solutions voluntarily recalled over 89,000 kg of branded liquid egg products (Egg Beaters, Bob Evans) in 2025 due to potential contamination with an unapproved substance (sodium hypochlorite).

24 2025 – Multistate Salmonella outbreaks and shell egg recalls in USA

One of a number of USA Salmonella outbreaks in 2025 linked to fresh shell eggs led to at least 79 confirmed illnesses and 21 hospitalisations across seven U.S. states. The outbreak prompted the recall of around 1.7 million dozen cage-free and organic eggs distributed by August Egg Company.

25 2023 – Singapore recall of eggs imported from Ukraine

The Singapore Food Agency ordered a recall of eggs imported from the LCC Yasensvit farm in Ukraine after detecting Salmonella Enteritidis in them.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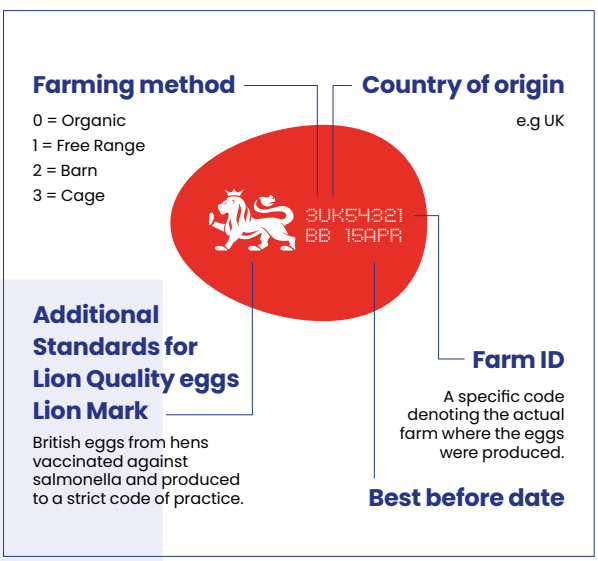
GAPS IN STANDARDS AND WEAKNESSES IN IMPORT CONTROLS

4.1 BRITISH LION CODE OF PRACTICE VS OTHERS

The British Lion Code of Practice is widely recognised as the most comprehensive and robust egg assurance scheme in the world. Introduced in 1998 in response to food safety challenges, it transformed UK egg production standards and restored consumer confidence through a fully integrated, independently audited system covering the entire supply chain - from breeding flocks and hatcheries through to packing centres and egg processing plants.

For shell eggs, the Code requires compulsory vaccination of laying hens against Salmonella, full traceability stamped on every egg, regular independent auditing, stringent feed controls, enhanced hygiene protocols, and strict temperature management throughout storage and distribution.

These measures go significantly beyond baseline legal requirements in many countries and have effectively led to a dramatic reduction in Salmonella incidence in UK eggs. Such is the confidence in the safety of British Lion eggs, the Food Standards Agency updated its advice in 2017 to confirm that vulnerable groups (pregnant women, babies and the elderly) can consume British Lion eggs runny or raw.



The British Lion Code also extends to processed egg products, applying comprehensive standards on sourcing, pasteurisation, traceability and hygiene. Egg products must come from British Lion-approved farms and be handled in audited facilities operating to rigorous food safety and quality management systems. This whole-chain approach ensures that safety is embedded at every stage, not simply inspected at the end.

Where alternative processing guidelines exist across Europe and elsewhere, compliance typically meets the minimum requirements set out in EU legislation. These frameworks often lack the detailed safeguards and robust enforcement mechanisms contained within the British Lion Code of Practice for the Production of Lion Quality Egg Products, which is what distinguishes the scheme.

There is a common misconception that because a product is "pasteurised" it is automatically safe. It should be noted that pasteurisation is not sterilisation. It is a 5 log reduction (99.999%) and this is of particular relevance if there is a high bacterial loading - notably pathogens – in the raw material prior to pasteurisation. In reality, pasteurisation is just one critical control point within a wider food safety system. The British Lion Code of Practice requires multiple layers of protection.

This additional protection is critical. For example, under the British Lion Code, eggs from flocks that test positive for Salmonella are not permitted to enter the British Lion processing supply chain. This upstream control means risk is addressed at source rather than relying solely on heat treatment at the end of the process.

In addition, British Lion processing facilities must operate to strict, specified time-and-temperature controls for all products, whether poached eggs, liquid whole egg, or egg white.

For egg white in particular this is vital because heat treatment parameters need to be tightly defined to ensure pathogen reduction while still maintaining functional performance. There have been a number of egg white issues in Europe, where heat treatment has been insufficient, leading to Salmonella outbreaks.

4.2 ISSUES WITH TRANSPARENCY / TRACEABILITY

There is an increasing disconnect in the UK food system between consumer perception and the often less reassuring reality.

Research by the British Egg Industry Council has found that most shoppers assume the eggs, meat and dairy products on supermarket shelves, and those in processed foods, are produced by British farmers to high safety and hen welfare standards. Too often, that assumption is misplaced, as many of these products or their ingredients are imported.

Long international supply chains and the use of imported ingredients mean that provenance and production standards are not always clear, creating confusion and potential risks for consumers and businesses alike. As the UK Government continues to prioritise trade deals over regulatory alignment, industry concerns are growing that this gap between expectation and reality will widen.

Previous supply chain failures have demonstrated how quickly public trust can be undermined. The horsemeat scandal starkly illustrated the consequences when traceability fails. The question remains whether the lessons have truly been learned or whether the vulnerabilities persist. Sourcing ingredients from countries with weaker regulatory oversight or less stringent standards increases the risk of food safety breaches, fraud and loss of consumer confidence. Recent issues involving imported eggs and egg products highlight these concerns. With the volume of egg imports rising sharply, British food businesses, and their customers, are becoming increasingly exposed to these risks. Food safety professionals are acutely aware of these challenges but, concerningly, that awareness is not always reflected in procurement decisions.

Shell eggs and products produced under the British Lion Code of Practice are widely regarded as the benchmark for safety, quality and traceability. However, when imported eggs or eggs in the form of products are used in ready meals, quiches or sandwiches, that transparency can disappear. Unless British Lion egg products are used, traceability can become less certain.

Imported eggs may also end up in foods labelled or marketed as British, undermining consumer trust and disadvantaging UK producers who have invested heavily in higher hen welfare and food safety standards.

This issue is not unique to eggs. Across meat, dairy and other ingredients, inconsistencies in international standards create a patchwork of risk. Packaging can imply British provenance, while key components are sourced from overseas systems that would not meet UK standards.

Many food businesses champion British sourcing but they have both a moral and commercial responsibility to ensure their sourcing genuinely reflects those claims. Consumers have a right to trust that food labelled as British meets British standards – especially when those standards are a selling point.

UK supermarkets exclusively source and stock British Lion shell eggs, recognising the value of the high standards delivered by domestic producers. However, to ensure the highest food safety regime, the same scrutiny should be applied to all processed foods containing eggs. Aligning procurement practices with consumer expectations, and including country of origin labelling for eggs used in food products, would help safeguard the reputations of both brands and retailers.

Sourcing to British standards is more than a marketing tool; it's an investment in the credibility of our food system. It protects trust, supports British agriculture and ensures the UK remains a leader in food safety and animal welfare at a time when British farming is under increasing pressure.

Nick Allen, Chief Executive, British Egg Industry Council


DOVER
DOVER

4.3 THE ANIMAL WELFARE GAP

Enriched colony cages were developed to replace conventional 'battery' cages, which were banned in 2012.

Unlike conventional 'battery' cages, enriched colony systems provide significantly more space per hen, along with defined welfare features including perches, nest areas and scratching pads. These additions are designed to allow hens to express key natural behaviours such as perching, nesting and ground-scratching.

The distinction is recognised by welfare bodies including Compassion in World Farming International, which has acknowledged enriched colony cages as an improvement on conventional 'battery' systems, even while advocating for non-cage alternatives.

In contrast, some egg-producing countries outside the UK and EU, including Ukraine, continue to permit conventional 'battery' cage systems. These systems operate with lower minimum space allowances and without mandatory enrichments such as perches or nesting areas. This creates a clear welfare gap between the required UK production standards and those in countries where older-style conventional 'battery' cages remain legal. This also represents a competitive disadvantage to UK producers that have invested millions of pounds in higher welfare systems and are not able to produce eggs as cheaply.

A 'Closing the Welfare Gap' report released in 2025 by Compassion in World Farming, Animal Policy International and the RSPCA found that of the UK's trading partners (95%) have lower farmed animal welfare standards than the UK.

4.4 IMPORTED EGGS & QUALITY CONTROL: UK PORT CONTROLS & GAPS

Food safety expert Dr Lisa Ackerley conducted a detailed review of the UK import control regime for eggs, examining the step-by-step border process, inspection requirements and enforcement mechanisms.

The system includes pre-notification via the UK Government's Import of Products, Animals, Food and Feed System (IPAFFS), entry through approved Border Control Posts (BCPs), 100% documentary checks, and risk-based identity and physical inspections under the Border Target Operating Model (BTOM).

Eggs are classified as "medium risk" (M2), with a baseline physical inspection rate of 15% of consignments. However, microbiological and residue testing is not mandatory within that 15%, and sampling frequencies are not publicly disclosed. Physical checks may include temperature, integrity and documentation checks, but pathogen or antibiotic residue testing is triggered by risk indicators rather than applied universally.

The review identified several structural weaknesses:

- Only a small proportion of consignments receive physical checks.
- Microbiological and antibiotic residue testing is not systematic.
- The system relies heavily on exporting-country standards and paperwork.
- Fraud or mislabelling may go undetected where consignments are not selected for inspection.
- Throughput pressures at busy ports may further limit scrutiny.

Sampling plans and results are not transparent or publicly available. While non-compliant consignments can be rejected or destroyed if detected, the regime is risk-based rather than comprehensive. The review concluded that current controls do not fully mitigate risks relating to residues, Salmonella contamination, traceability or hen welfare divergence in imported eggs.

The parliamentary Environment, Food and Rural Affairs Committee said the evidence suggests unchecked products are effectively "being let in through the front door" and warns the system is "dysfunctional" without stronger enforcement.

4.5 INTERNATIONAL BENCHMARK: EU STRENGTHENING IMPORT CONTROLS

While the EU has lower egg safety production standards than the British Lion Code requires in the UK, it has recognised the risks associated with imports produced to lower or divergent standards.

In January 2026, the European Commission formally launched a dedicated task force focused on food and feed safety, pesticide residues and coordinated monitoring of imported products.

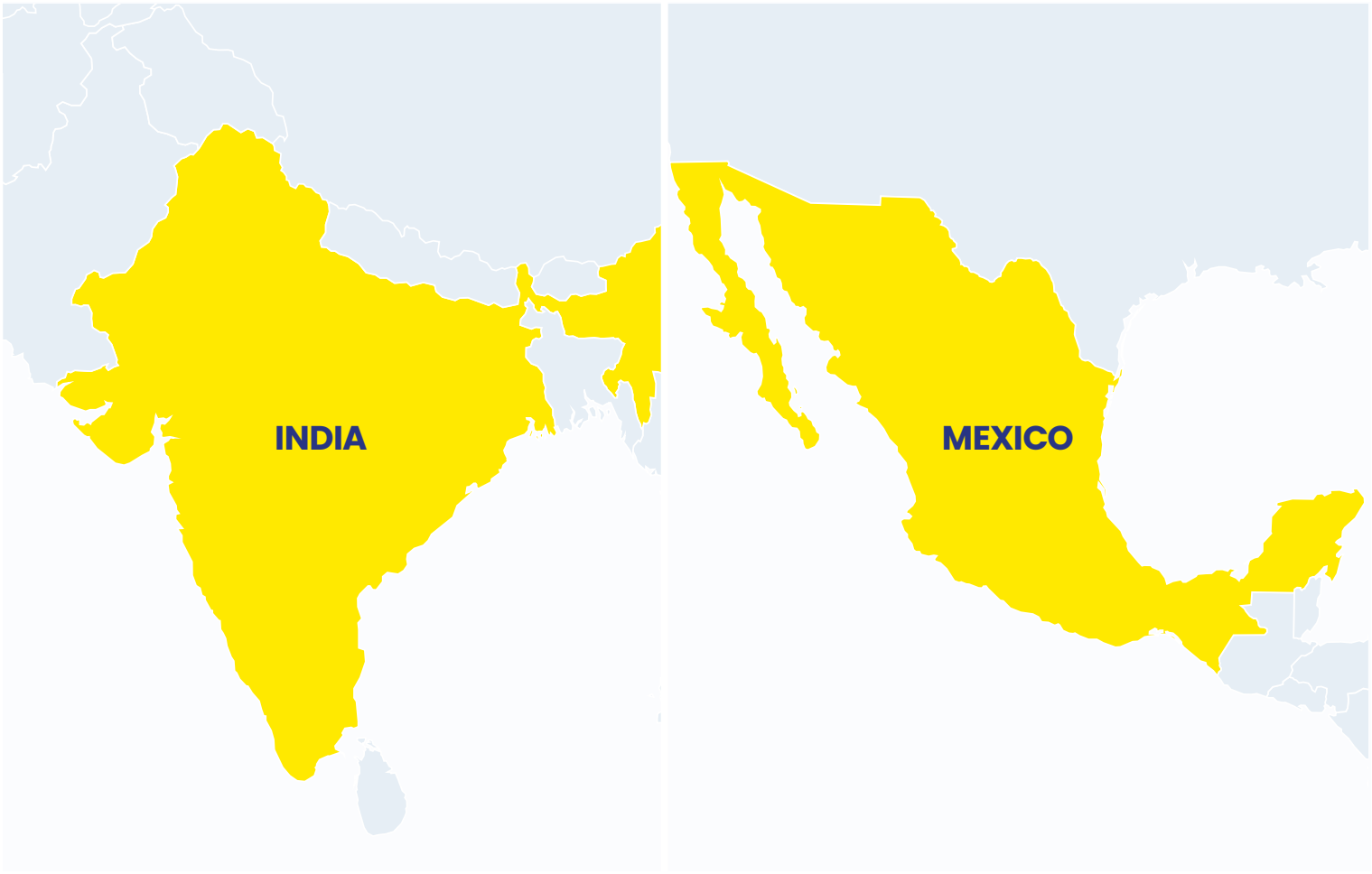
The task force brings together expertise from the Commission and Member States and aims to further harmonise import controls, develop joint enforcement actions and identify where additional regulatory measures are needed.

This initiative builds on the Commission's December 2025 announcement reinforcing import oversight, including:

- A 50% increase in audits of non-EU countries
- Stricter rules on products containing residues of pesticides banned in the EU
- Enhanced scrutiny of higher-risk origins

The stated objective is to ensure imports meet EU standards while supporting domestic producers and safeguarding public health.

At a time when the EU is strengthening controls to protect both consumers and producers, the UK's current risk-based border regime, with limited physical inspection rates and non-universal testing, appears comparatively less robust.



4.6 FUTURE THREATS: INDIA AND MEXICO

While current scrutiny has focused on European suppliers, future trade agreements could significantly widen the UK's exposure to eggs and egg products produced in conventional 'battery' cage systems.

India
India is one of the world's largest egg producers, with the majority of laying hens housed in conventional 'battery' cages. In late 2025, Indian authorities initiated nationwide testing following public concerns about antibiotic residues in eggs.

Although eggs are currently treated as a sensitive product in the UK–India trade agreement, India is a major exporter of dried egg products used in food manufacturing. If there was to be any future tariff reductions on egg ingredients without equivalent hen welfare conditions, this could increase the economic attractiveness of importing lower-cost egg powders and liquid products produced to standards below those required of UK producers.

Mexico
In Mexico, conventional 'battery' cages dominate commercial egg production, and there is no production Code covering hen welfare or mandatory Salmonella vaccination standards comparable to the UK's.

The UK's accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership trade bloc, which includes Mexico, creates a pathway for tariff reductions on egg products over a 10-year period. While Mexican egg exports to the UK are currently limited, due to the current tariff, when tariffs are removed in 2033, lower-cost egg powders and ingredients would become more competitive in UK manufacturing and foodservice supply chains.

ECONOMIC & ETHICAL

CONSEQUENCES FOR BRITISH CONSUMERS, PRODUCERS & BUSINESSES

5.1 QUANTIFYING THE IMPACT

Whether food safety, fraud or ethically unsound production practices, the cumulative impact of egg and egg-ingredient incidents recorded across multiple European countries, demonstrates the complex economic, ethical and strategic risks associated with egg production and processing when adequate controls are not in place.

From a food safety perspective, Salmonella outbreaks in the UK, Sweden, Poland and Belgium have resulted in human illness, hospitalisations and widespread product recalls, demonstrating that contamination can arise at farm, processing or supply chain level. They highlight the real risk to consumers when imported eggs are served runny or used in lightly cooked dishes, where bacteria may survive.

Chemical residue incidents, such as banned AOZ (an antibiotic banned in food-producing animals in the UK and EU) detected in Ukrainian eggs (RASFF 2025), pose potential long-term health concerns and underline the importance of rigorous regulatory oversight and border controls.

Incidents of mislabelling and fraud across the Netherlands, Italy, Spain and Germany have eroded consumer trust in premium and organic products, while hen welfare violations — including the continued use of conventional 'battery' cages in some exporting countries — conflict directly with UK legal standards and public expectations.

14 BILLION + EGGS consumed annually in UK

Economically, the influx of lower-cost imports produced to lower standards undercuts British producers operating under the British Lion Code of Practice and other assurance systems. This places additional financial pressure on UK farmers committed to high-welfare and high-biosecurity standards, and risks undermining the long-term sustainability of domestic egg output.

This has implications beyond individual businesses. The UK consumes more than 14 billion eggs annually, making eggs one of the country's most affordable and accessible protein sources. Weakening domestic production capacity through unfair competition increases reliance on imports at a time of geopolitical instability, supply chain disruption and heightened concern over food security. Once lost, domestic production infrastructure is difficult and costly to rebuild.

From an ethical standpoint, the presence of conventional 'battery' cage eggs, which are illegal to produce in the UK, raises serious moral concerns for both businesses and consumers, undermining confidence in the integrity of the marketplace.

Collectively, these events carry significant reputational consequences for the wider egg sector and food businesses. Multi-country food safety outbreaks, residue alerts and fraud cases risk undermining public confidence in eggs more broadly, reinforcing the importance of robust traceability, auditing and compliance across the entire supply chain. Protecting public health, consumer trust, domestic livelihoods and national food resilience requires that imported products meet the same standards and that enforcement remains rigorous and consistent.

5.2 THE COST OF REPUTATIONAL DAMAGE IN FOOD SAFETY INCIDENTS

Food safety breaches and product recalls hit far beyond the cost of disposal and logistics. Industry studies show that the average food or beverage recall costs £7–8 million, with larger or multi-country incidents easily exceeding £10 million.

The reputational impact is often even more damaging:

- Over half of consumers switch brands after a food safety incident.
- Around 15% never return to the product.
- 21% avoid all products from the affected manufacturer.

For food businesses using imported eggs, even a single contaminated batch from overseas could result in recall costs, legal exposure, and lasting damage to consumer trust.

> *It could cost your reputation, and equally it could cost you a fine and these are not small fines but significant because it's based on turnover not profit.*
>
> **Kathryn Gilbertson, Regulatory lawyer**

5.3 ADVICE FROM THE CHARTERED INSTITUTE OF ENVIRONMENTAL HEALTH

"We share the concerns outlined in this report about the potential risks, including Salmonella, to the British public with the increase in eggs being imported. Imported eggs that do not meet the same rigorous requirements to which UK-sourced eggs have to adhere create unnecessary risks for public health.

"Consumers in the UK are fortunate to benefit from the British Lion Code of Practice, which sets some of the most robust egg safety standards in the world.

"Eggs carrying the Red Lion mark have been produced in line with the stringent requirements of the British Lion Code of Practice, giving reassurance that they meet rigorous hygiene, traceability, and Salmonella control measures.

"We would encourage consumers to look for the British Red Lion mark when buying eggs, as it remains the best indicator that the product has been produced to the highest safety standards.

"We urge food businesses to ensure they fully understand the provenance of the eggs they buy and to verify that they meet UK safety standards."

Ian Andrews, Head of Environmental Health at the Chartered Institute of Environmental Health (CIEH)

5.4 ENVIRONMENTAL IMPACT OF IMPORTED EGGS

Imported eggs and egg products can travel long distances adding significant transport-related emissions, and making them less environmentally friendly compared with domestically produced eggs.

Refrigerated transport further increases energy use, as maintaining cold chains consumes electricity or fossil fuels. These emissions add to the overall environmental footprint of imported eggs, meaning that even if production abroad is efficient (environmental regulation can vary from country to country), the transport stage can significantly increase their carbon footprint.

POLITICAL SUPPORT & PUBLIC OPINION ON PRIORITISING BRITISH EGGS

6.1 MPs AND INDUSTRY SUPPORTING ACTION ON IMPORTS*

"This issue also has serious implications for British farmers, who are placed at a competitive disadvantage by the tariff free import of eggs from [battery] caged Ukrainian hens. The Government have extended for a further two years the relationship whereby Ukrainian eggs can be imported into this country, despite those eggs not being produced at the high standards that we require in this country and industry concerns around salmonella."

Claire Hazelgrove MP

"The British Lion Code of Practice is one of the most trusted and rigorous food assurance schemes in the world... retailers, food manufacturers, food service providers and public bodies should be using the best of British."

Sarah Champion MP

"Most consumers would feel zero impact, with battery cage imports going to independent retailers and foodservice as it stands. The boost to domestic farmers, by contrast, would be huge. UK egg farmers could gain up to £15 million annually if 'battery' cage imports were banned. There would also be price stabilisation if we removed imports that undercut UK eggs by up to 20p per dozen. That does not cost the Exchequer; it would be quite a significant benefit to the Exchequer."

Amanda Hack MP - On banning 'battery' cage egg imports

"Our farmers are among the best in the world and I would call on all our supermarkets, wherever possible, to champion their produce. Consumers deserve the choice to buy homegrown in the knowledge they are not just buying a product but supporting jobs and honouring our high animal welfare standards. British eggs are safe to eat and better than imported alternatives for the planet. It is high time we see that reflected on our supermarket shelves."

Ruth Jones MP - Discussing hidden egg ingredients in products

"British farmers and food producers are crucial to our nation's food security, feeding the nation with high-standard produce. Making origin labelling clearer and simpler will encourage us all to eat more British-made food. Let's eat for Britain!"

Victoria Atkins MP, Shadow Environment Secretary

"UK farmers are proud to produce to high standards which the British public rightly values. We need the UK Government to do what it said it would do to ensure British farming can compete on a level playing field and ensure that Ukrainian poultry imports meet our domestic animal welfare standards. Without this, we risk not only displacing British production through unsustainable volumes of imports, but with products that have been produced in ways that are illegal here.

"The monitoring of trade flows is vital and the UK Government must be prepared to step in if poultry meat and egg imports continue to increase as it puts greater pressure on British producers at a time when they already face a number of challenges. It's imperative we find the right balance to ensure the success of both the Ukrainian and UK's poultry meat and egg sectors now and in the future."

Will Raw, NFU Poultry Board Chair

*These quotes are in the public domain and were not provided in direct response to the findings of the *Shell Shocked* report.

6.2 BRITISH CONSUMERS

Consumer attitudes to imported eggs and egg products.

According to research conducted by Obsurvant (2,007 respondents 03.2026) on behalf of the BEIC, consumers strongly support Government action against 'battery' cage egg imports, and demand clearer labelling for foods made with egg. However, awareness of the current risks is low, and trust in Government enforcement is mixed.

30%

LOW AWARENESS, HIGH CONCERN AROUND BARREN BATTERY CAGES:

Only 30% of UK adults are aware that while 'battery' cage eggs are illegal to produce domestically, they can still be imported. Seven in ten consumers simply do not know this loophole exists.

82%

YET WHEN INFORMED, CONCERN RISES SHARPLY:

82% concerned about imported 'battery' cage eggs entering the UK market.

91%

WHEN IT COMES SPECIFICALLY TO FOOD SAFETY RISKS:

91% are concerned about safety risks from imported eggs.

95%

STRONG SUPPORT FOR UK STANDARDS:

The British public shows overwhelming backing for maintaining high welfare standards.

95% say it is important that all eggs sold in the UK meet UK animal welfare standards.

25%

HOWEVER, KNOWLEDGE OF EXISTING PROTECTIONS IS UNEVEN:

Only 25% know imported eggs are not approved to be served runny to vulnerable groups (pregnant women, babies, and the elderly.)

83%

IF FOOD PRODUCTS WERE FOUND TO CONTAIN IMPORTED BATTERY CAGE EGGS:

83% say it would influence their purchasing decision.

85%

CLEARER LABELLING OF FOOD CONTAINING EGG WOULD HAVE AN EVEN STRONGER IMPACT:

85% say clearer labelling (country of origin + production system) would influence buying habits.

56%

TRUST IN GOVERNMENT SAFEGUARDS IS MIXED:

56% trust the UK Government to prevent lower-standard eggs entering the market. 44% do not trust the Government.

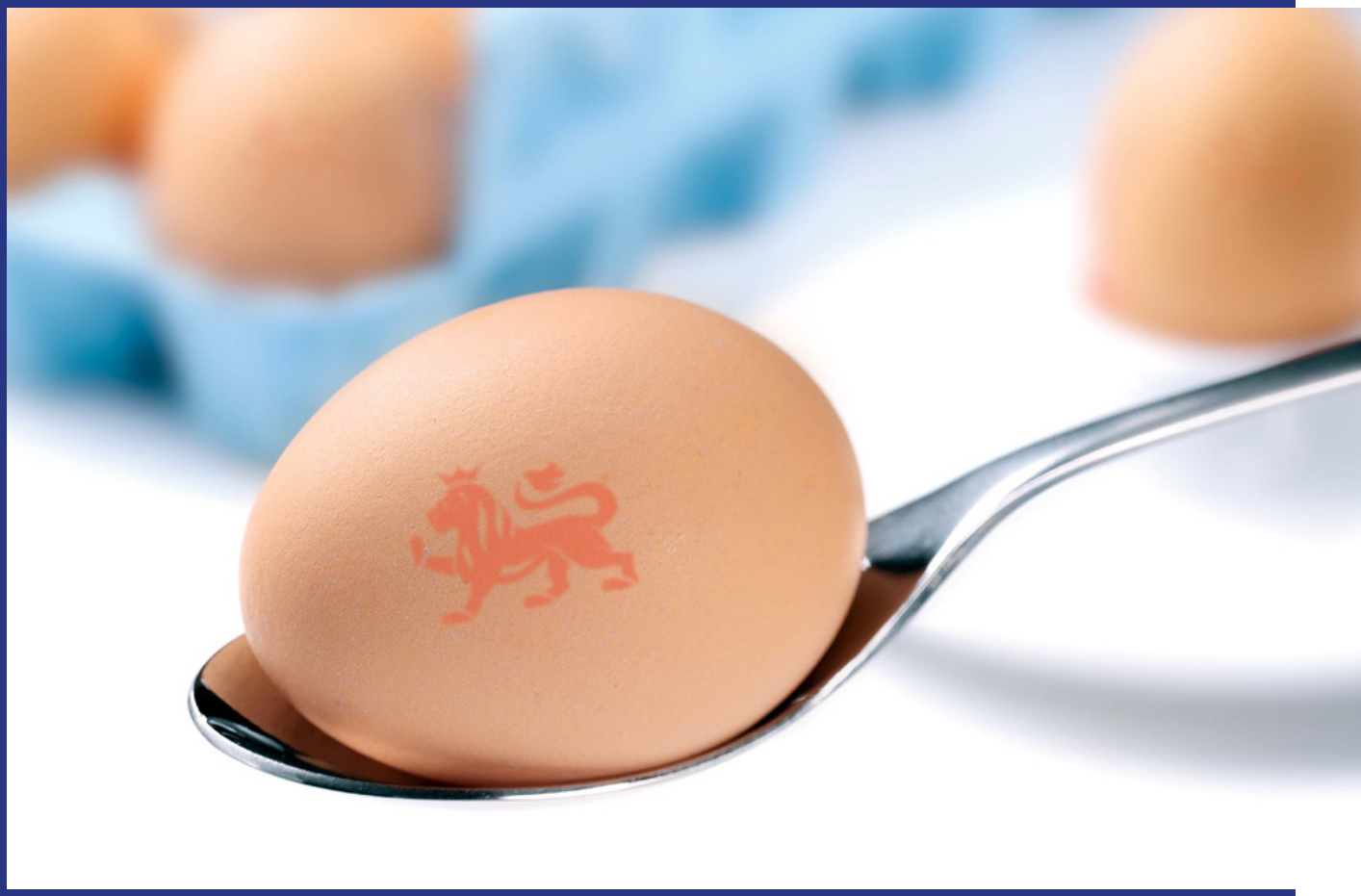
84%

DESPITE THIS DIVIDED TRUST, PUBLIC SUPPORT IS OVERWHELMING:

84% agree the UK Government should ban imports of eggs produced in 'battery' cages.

The public believes that conventional 'battery' cages are largely a thing of the past in the UK. However, many are unaware that imported eggs and egg products can be produced using systems that are banned domestically. When informed, research shows consumers react strongly, expressing high levels of concern, a willingness to change purchasing behaviour, and clear support for a ban.

This presents an important signal for policy makers and food businesses. The findings suggest that the British public expects UK food standards to be strong, transparent and consistently applied.



6.3 BRITISH LION MARK AWARENESS

Awareness of the British Lion mark has remained strong at 80%, according to the latest tracking survey from the British Egg Industry Council, carried out by Obsurvant (02.2026 among 2,011 respondents), reinforcing its position as the UK's most recognised food assurance mark. By comparison, awareness of Red Tractor stands at 65%, while RSPCA Assured is recognised by 25% of consumers.

The survey of more than 2,000 consumers also highlights the strength of engagement with the British Lion mark at point of purchase. Almost half of shoppers (47%) actively look for the British Lion when buying eggs. Engagement is even stronger among younger consumers, with more than half (56%) of 25–34 year olds seeking out the British Lion mark. More than 60% of parents of under 2s actively seek the British Lion mark when shopping in-store.

Consumers understand the British Lion mark to signify that the egg is British, that quality is assured and that it is safer than other eggs.

CONCLUSION

The evidence set out in this report paints a clear and concerning picture.

Egg imports into the UK are rising at an unprecedented rate. At the same time, documented food safety incidents across Europe and beyond - including Salmonella outbreaks, antibiotic residues, chemical contamination, hen welfare violations and fraud - demonstrate that egg supply chains operating outside the British Lion Code of Practice carry materially higher risks.

The Food Standards Agency has formally recognised that imported eggs and egg products can present microbiological and chemical hazards. Data from the EU's Rapid Alert System for Food and Feed (RASFF) shows repeated alerts linked to Salmonella and chemical residues. While border controls are structured, they are risk-based rather than comprehensive; only a proportion of consignments receive physical inspection, and microbiological and residue testing is limited.

Meanwhile, the majority of British producers operate under the British Lion Code of Practice, a world-leading, independently audited food assurance scheme that requires mandatory Salmonella vaccination, full traceability and strict processing controls that go far beyond baseline legal standards. UK farmers have invested hundreds of millions of pounds to meet these requirements.

If eggs produced to lower standards continue to enter the UK market without the same safeguards, the consequences are significant. Hen welfare standards may be undermined, environmental impacts increased, and economic distortions created. Consumers may unknowingly purchase products containing eggs that would be illegal to produce domestically. Food businesses risk regulatory and reputational harm, while British farmers face unfair competition from systems operating to lower standards.

There is also a broader strategic risk. The UK consumes more than 14 billion eggs each year, making them one of the country's most affordable and accessible sources of high-quality natural protein. Eroding domestic production capacity through unfair import competition increases reliance on overseas supply chains at a time of geopolitical instability, trade disruption and growing concern over national food resilience. Once domestic production declines, rebuilding it is costly and time-consuming.

The principle is simple: if a production system is not legal in the UK, its products should not be allowed to enter the UK market, and neither should food produced to lower food safety standards.

CONCLUSION
CONTINUED

Aligning import standards with domestic requirements is not protectionism. Eggs produced to lower welfare and safety standards represent a multi-dimensional risk to the UK:

- **Food safety:** Salmonella, chemical residues and processed egg risks
- **Economic:** Underpricing threatens British producers and rural livelihoods
- **Environment:** Imports typically carry a larger carbon footprint
- **Ethical:** Eggs from conventional 'battery' cage systems banned in the UK still enter the market freely
- **Food security:** Reduced domestic capacity increases exposure to external shocks
- **Consumer trust:** The decades-long restoration of confidence achieved through the British Lion Code of Practice could be undermined

UK policymakers, food businesses and consumers must recognise these risks and act decisively.

Shell Shocked highlights the urgent need to protect British egg production, safeguard public health, strengthen national food security and uphold the ethical standards that UK consumers expect.

RECOMMENDATIONS

- **Align import standards with domestic requirements**: Ensure eggs imported into the UK meet the same food safety, traceability, and hen welfare standards.
- **Strengthen border and inspection controls:** Expand verification measures, including testing for Salmonella and chemical residues, alongside stricter checks on product labelling.
- **Improve transparency through labelling:** Require clear country of origin and production method labelling where eggs are a majority ingredient in food products, enabling consumers to make informed purchasing choices.
- **Support domestic producers:** Maintain policy support to ensure the UK remains a global leader in egg safety, biosecurity and animal welfare standards.

SOURCES

UK Import & Trade Data

- HMRC Overseas Trade Statistics – UK egg import volumes (monthly & annual)
- UK Trade Info (HMRC database)
- UK–Ukraine Free Trade Agreement (DIT / DBT publications)
- APHA import consignment data (IPAFFS notifications where available)

Food Safety & Risk

- Food Standards Agency (2024) – Risk Profile: Imported Eggs and Egg Products (DOI: 10.46756/001c.126013)
- FSA & UKHSA Salmonella surveillance reports
- EFSA & ECDC EU One Health Zoonoses Reports (annual)
- RASFF Portal Database (2020–2025 egg notifications)
- UKHSA Salmonella outbreak reports (including egg-linked incidents)

Border Controls

- Border Target Operating Model (BTOM) – DEFRA
- Import Information Note A/16 (FSA)
- Suffolk Coastal Port Health Authority guidance
- Dr Lisa Ackerley commentary (formal written opinion recommended)

Consumer & Political

- BEIC consumer research (Lion awareness)
- MP parliamentary statements (Hansard)
- CIEH position statements on responsible sourcing

Specific Incidents

- FSA recall notices (Dr Zak's; Orgenism supplement)
- European Commission RASFF notifications (AOZ/ nitrofuran residues)
- Swedish Food Agency recall statements (2024–2025)
- French Ministry of Agriculture Salmonella recall notices
- US FDA recall database (August Egg Co.; Cargill liquid egg recall)
- Singapore Food Agency recall notice (Ukrainian eggs)

Hen Welfare & Standards

- British Lion Code of Practice (BEIC)
- Compassion in World Farming commentary on enriched colony cages
- Council Directive 1999/74/EC (EU cage ban legislation)
- Ukrainian production system data (industry reports / CIWF commentary)

Legal & Enforcement

- Food Safety Act 1990
- Sentencing Council Guidelines (food safety offences – turnover-based fines)
- "The Cost of Food Safety Recalls and Brand Damage." BRCGS Insight Report
- Legal commentary from Kathryn Gilbertson

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