



Submission to the Department of Agriculture, Food and the Marine

Animal Welfare Strategy 2026–2030 Consultation

Submitted by: **Hop to Save Rabbits**

Submitted to: **Mr Martin Heydon T.D., Minister for Agriculture, Food and the Marine**

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Executive Summary

This submission responds to the Department of Agriculture, Food and the Marine's invitation of 19 November 2025 to contribute to the development of Ireland's **Animal Welfare Strategy 2026–2030**.

It sets out the case for **explicit, species-specific protection for rabbits and hares**, two sentient species that continue to fall through legislative and regulatory gaps across multiple legal contexts, including companion animal ownership, farming, wildlife management, hunting, rehabilitation and laboratory use.

Despite their widespread presence in Ireland as companion animals and their recognised ecological role, rabbits and hares remain subject to **systemic welfare failures**. These failures are not isolated incidents but the predictable consequence of **fragmented legislation, outdated classifications and the absence of species-specific standards and enforcement structures**.

The submission also presents a reasoned case for Ireland to **retain and exercise the right to prohibit the farming, importation and sale of rabbit meat**, based on well-documented welfare concerns, zoonotic risks and regulatory inconsistency.

Ireland now has a clear opportunity to develop an Animal Welfare Strategy that is **modern, evidence-led, measurable and enforceable**, and that ensures rabbits and hares are no longer treated as residual or anomalous species within Irish law.

The submission also presents a reasoned case for Ireland to **retain and exercise the right to prohibit the farming, importation and sale of rabbit meat**, based on documented welfare concerns, zoonotic risks, and regulatory inconsistency. Rabbit meat production has effectively disappeared from official Irish agricultural statistics since 2010, despite no evidence that the industry has ceased. This statistical invisibility reflects and reinforces the systemic lack of oversight characterising rabbit farming in Ireland.

Hop to Save Rabbits has previously submitted a response to the SPS consultation addressing related animal welfare and regulatory issues; this submission should be read as **complementary and self-standing**. [Written evidence submitted to the UK Parliament](#).

1. Introduction

Hop to Save Rabbits is a UK-based specialist animal welfare organisation dedicated to the protection of rabbits and hares across all contexts in which they live, are managed or are exploited. The



organisation operates as a small, specialist charity and engages in advocacy across the United Kingdom and internationally through evidence-based policy submissions.

Rabbits are among the most popular companion animals in Europe, while hares are a native wild species of ecological importance. Yet both continue to be regulated through **incomplete, inconsistent or unsuitable legal frameworks** that fail to reflect contemporary veterinary science, behavioural research or public expectations of animal welfare.

Across Ireland, rabbits and hares are variously classified — or left undefined — as pets, farmed animals, wildlife, pests or laboratory animals. This results in **significant welfare gaps**, particularly where animals move between categories, such as:

- pet rabbits bred and sold commercially;
- wild rabbits and hares subject to lethal control or hunting;
- rehabilitated wildlife deemed unreleasable;
- rabbits used in laboratory research.

This submission urges the Government to use the Animal Welfare Strategy 2026–2030 to **address these structural deficiencies** and to introduce a coherent, species-inclusive approach grounded in science, transparency and enforcement.

2. Definitional Gaps in Irish Law: A Structural Problem

A central weakness in Ireland's current animal welfare framework is the **absence of clear, consistent legal definitions** for key animal categories.

In particular:

- “**Companion animal**” is not comprehensively defined in primary legislation;
- “**Pet**” is used colloquially rather than as a legally robust category;
- “**Farmed animal**” protections are species-specific for some animals but not others;
- “**Rehabilitated wild animal**” is not defined in statute at all.

Rabbits and hares are uniquely affected by this ambiguity because they span **multiple legal and practical categories simultaneously**. For example:

- rabbits may be kept as pets, farmed for meat, used in laboratories or treated as pests;
- hares are nominally protected wildlife yet remain subject to hunting and coursing;
- rehabilitated rabbits and hares exist outside any statutory framework governing care, release or long-term sanctuary.



The absence of rabbit meat from recent CSO Meat Supply Balance reports (2022–2024), despite inclusion in 2010 statistics, illustrates how rabbits occupy a **persistent regulatory blind spot**. Without formal classification, they cannot be counted; without counting, they cannot be regulated; without regulation, welfare standards cannot be enforced.

Without clear definitions, enforcement bodies, veterinarians, rescues and courts lack certainty, resulting in **inconsistent decision-making and diminished welfare outcomes**. A modern Animal Welfare Strategy must explicitly confront this issue.

3. Responding to the Core Consultation Questions

3.1 Relevance of the Existing Themes

The existing strategic themes — Partnership, Science and Evidence-Led Policy-Making, Education, Evaluation and Regulation — remain relevant.

However, they are **insufficiently granular** to address species that do not fit neatly into traditional animal categories.

An additional, explicit theme is required:

Species-Specific Protection

Without species-specific recognition and standards, rabbits and hares will continue to fall into regulatory gaps, undermining the objectives of the Strategy itself.

3.2 Priority Areas for the Strategy

The most urgent welfare priorities for rabbits and hares include:

- ending cage-based rabbit farming;
- regulating the breeding and sale of rabbits, including online sales;
- introducing statutory protections for wild rabbits and hares;
- reforming hunting and population-control practices to ensure humane standards;
- establishing a national framework for wildlife rehabilitation;
- increasing veterinary capacity and training in lagomorph medicine.

These priorities are supported by scientific evidence, welfare data and public concern.

3.3 Measuring Success

Success under the Strategy should be assessed through clear, measurable outcomes, including:



- the elimination of cage-based rabbit farming;
- the introduction of species-specific welfare codes for rabbits and hares;
- a demonstrable reduction in inhumane hunting and control methods;
- improved enforcement capacity and consistency;
- annual publication of rabbit and hare welfare data.

4. Legal Context: Where Current Law Fails Rabbits and Hares

4.1 Animal Health and Welfare Act 2013

- no species-specific welfare provisions for rabbits or hares;
- exemptions for hunting activities;
- broad duties insufficient to address complex welfare needs.

4.2 Wildlife Acts 1976–2018

- wild rabbits remain largely unprotected;
- hares are protected in principle but not in practice;
- hunting and coursing remain lawful;
- no statutory humane killing standards.

4.3 Pet Sales and Breeding

- no comprehensive licensing or regulation of rabbit sales;
- online and third-party sales largely unregulated.

4.4 Farmed Rabbits

- no species-specific legislation;
- welfare standards significantly below modern expectations.

4.5 Wildlife Rehabilitation

- no statutory framework governing rehabilitation, release or sanctuary.

4.6 Animal Testing

- implementation of EU Directive 2010/63/EU without specific commitments to reduce rabbit use or improve transparency.



5. Companion Rabbits

Pet rabbits in Ireland are frequently kept in inadequate housing, sold without proper information and denied access to appropriate veterinary care. These practices are incompatible with modern understanding of rabbit welfare and behaviour.

6. Wild Rabbits and Hares

Wild rabbits and hares face habitat loss, lethal control measures and hunting practices that cause avoidable suffering. Rehabilitated individuals are particularly vulnerable due to the absence of national policy or funding.

7. Farmed Rabbits and Rabbit Meat

Rabbit farming represents one of the least regulated livestock sectors in Europe. The European Food Safety Authority¹ has identified **severe, systemic welfare problems inherent in conventional cage systems**, including behavioural restriction, skeletal disorders and psychological distress. EFSA further noted that 94% of EU rabbits are produced in such systems, highlighting the scale of the welfare deficit.

The Irish Context: Statistical Invisibility and Regulatory Opacity

- CSO 2010: 11,000 tonnes² “Other Meat” (including rabbits)
- Exports 11,000 tonnes; domestic consumption 6,000 tonnes
- CSO 2022–2024³ reports no longer disaggregate this category

Trade and anecdotal evidence suggest small-scale commercial production continues largely unregulated. Without systematic data, traceability, or species-specific welfare standards, it is impossible to:

- ascertain welfare conditions
- trace disease outbreaks or zoonotic risk
- enforce humane slaughter requirements
- monitor imports or compliance

This absence of oversight constitutes a **de facto regulatory vacuum**.

International Context (Comparative Examples)

- **Switzerland:** national rabbit-welfare regulations for farmed rabbits; no national strategy

¹ <https://www.efsa.europa.eu/en/news/rabbit-cages-efsa-identifies-welfare-issues>

² https://www.cso.ie/en/media/csoie/releasespublications/documents/agriculture/2010/meatsup_2010.pdf

³ <https://www.cso.ie/en/releasesandpublications/ep/p-msb/meatsupplybalance2024/>



- **Germany⁴**: similar regulations; no national strategy
- **Spain, France, Italy, Portugal**: industry-led certification schemes; no government strategies
- **European Union**: general farm-animal welfare regulations; rabbits excluded from Welfare Quality® and AWIN assessments
- **United States**: no national rabbit-welfare strategy; laws fragmented

Ireland has the opportunity to establish **proactive, high welfare, species-specific standards** before an intensive industry becomes entrenched.

8. Recommendations

Ireland should:

- prohibit cage-based rabbit farming systems that fail to meet species-specific welfare needs
- require mandatory licensing and registration of all commercial rabbit breeding and production
- reinstate transparent data collection for rabbit meat production, slaughter and trade
- commission a review of rabbit meat production standards to ensure compliance with welfare requirements equivalent to other farmed mammals
- establish traceability requirements for all rabbit meat sold, domestic or imported
- recognise rabbits primarily as companion animals in public policy

9. Alignment with the Animal Welfare Strategy for England

England's 2025 Animal Welfare Strategy demonstrates the value of **species-specific standards, transparency and enforceable commitments**. Ireland can learn from this approach while retaining sovereignty and going further to address historically overlooked species

10. Cross-Cutting Issues

Education, veterinary training, rescue support, and data collection are essential. Without these, reforms risk remaining aspirational.

11. Urgently Needed Reforms

⁴ <https://www.compassioninfofoodbusiness.com/media/7458148/rabbit-production-eu-uk-review-2024.pdf>



Ireland requires:

- a fully funded, State-led animal welfare inspectorate
- mandatory licensing of all breeders and sellers, including online platforms
- species-specific welfare codes for rabbits and hares
- a national traceability and transparency database
- stronger penalties and consistent prosecution
- public education and prevention programmes

12. Comprehensive Scope

Rabbits and hares across:

- companion animal ownership
- wildlife management and rehabilitation
- farming and food production
- animal testing
- hunting and bloodsports

This breadth underscores the systemic nature of the problem.

13. Jurisdictional Perspective

Drawing on experience across the UK, Northern Ireland, and the Republic of Ireland, this submission identifies opportunities for harmonisation and leadership.

Ireland can **become a leader in modern, evidence-based animal welfare policy**, not merely align with other jurisdictions.

Conclusion

Rabbits and hares have been persistently overlooked within Irish animal welfare law. The Animal Welfare Strategy 2026–2030 provides a timely and necessary opportunity to correct this.

By introducing **species-specific protections, strengthening enforcement and addressing long-standing definitional gaps**, Ireland can ensure that these sentient animals are afforded meaningful protection in law and in practice.
