

AI governance for animals – why and how

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Problems, openings, questions

- 01 Why?**

what is deployed, what the data does, what current rules say, three risks, and a qualifier
- 02 How?**

three layers: the labs, the operators, the regulators, & current openings
- 03 Further discussion**

arguments against, further problems, what the field needs

AI is already in the barn, and in the water.

The automation that has been there for years

Ventilation, feeding and climate run on automated control systems.

The machine-learning layer on top

- microphones with high sensitivity
- cameras that score lameness
- ceiling robots that find dead birds by their temperature

In the water

91 companies selling AI tools to fish and shrimp farms, all of them on the market already (Rethink Priorities, 2025–26).

Most farmed animals already live in automated systems

≥ 85%

**of the UK's farmed animals
live in intensive systems**

Compassion in World Farming, 2025 (73%
counting indoor farms only)

99%

**of farmed animals in the
United States**

Sentience Institute, 2019, from the 2017
USDA census

+25% a year

**growth of the AI layer in
precision livestock farming**

market reports, 2026 – projections, added
on top of existing automation

Where does the data go?

What the systems record

- every cough
- every lame leg
- every death
- feed, weight, growth

Who has to see it

The operator

~~The regulator~~

~~The public~~

WHAT STAYS HIDDEN

- Mass deaths: no duty to report them to a welfare regulator; health duties run to a vet
- Scotland: 35 million farmed salmon dead in three years; inspection reports only after an FOI ruling
- Automation failures: no record; an evidence bank has 18 cases so far, none of them machine learning

Animals are not in the rules

EU AI Act

The high-risk list contains no animal context. Livestock AI was proposed in 2025 and found “not deemed to pose a risk of harm equivalent to or greater than” the listed uses (biometrics, critical infrastructure, education ...). No reason given. COM(2026) 234

GPAI Code of Practice

The rulebook most big model providers signed under the Act names “non-human welfare” as an example of systemic risk (2025). Undefined: no criteria, no test, no reporting. Review due 2027

United Kingdom

No public body has a remit over AI’s effect on animals (welfare: Defra · AI: DSIT). Sandbox red lines proposed by DSIT: consumer protection, safety, fundamental rights, workers, intellectual property. Not animals

Three risks

01

Entrenchment

Cheaper to run, so more profitable to expand and harder to displace. Where densities are capped, the ceiling moves: broilers 33 → 42 kg/m² if the records are good, and nobody audits the data.

02

Welfare washing

“AI records may serve as evidence during inspections” – EuroTier 2026 preview. Evidence defined, measured and held by the operator.

03

Misalignment

Major AI ethics guidelines omit animals (Coghlan, Parker & Lederman 2026). Models detect speciesist content but rarely judge it wrong (Jotautaitė et al., Nature Communications 2026).

AI tech can also help animals

Pays for itself

- earlier disease detection: coughs, lameness
- individual feeding; milking on the cow's own schedule
- most of what exists today

Double-edged: what raises profitability also raises the capacity to expand.

Improves the animal's own experience

- play detection in calves: over 90% accuracy, 53% more play with brushes (Nottingham)
- enrichment that responds to behaviour
- what the animals want

Mostly still research.

In every case, transparent indicators and data should be a minimum requirement.

HOW

Current openings

labs · operators · regulators and enforcers

Three layers

WHO	HOLDS	THE POLICY ASK	THE WINDOW
Labs	the models	tested for harm to animals, results reported	GPAI Code of Practice review, 2027
Operators	the deployed systems (farms, slaughterhouses, fish farms)	welfare data recorded against independent indicators and disclosed	EU welfare-law revision 2026–27 · UK Animal Sentience Committee
Regulators and enforcers	the evidence	existing footage used to enforce existing law	CCTV: UK, Spain, Israel

The labs: the GPAI Code of Practice

01

The instrument

The GPAI Code of Practice, review due 2027. “Non-human welfare” is among the Code’s illustrative examples of systemic risk.

02

To submit

A taxonomy of harms to animals, and a test a model can be run against.

03

The tests exist

AnimalHarmBench (2025) → ANIMA
→ CaML’s agentic benchmarks: what a model does when it acts, not what it says about its values.

The operators: policy asks and windows

Record, and disclose to the regulator

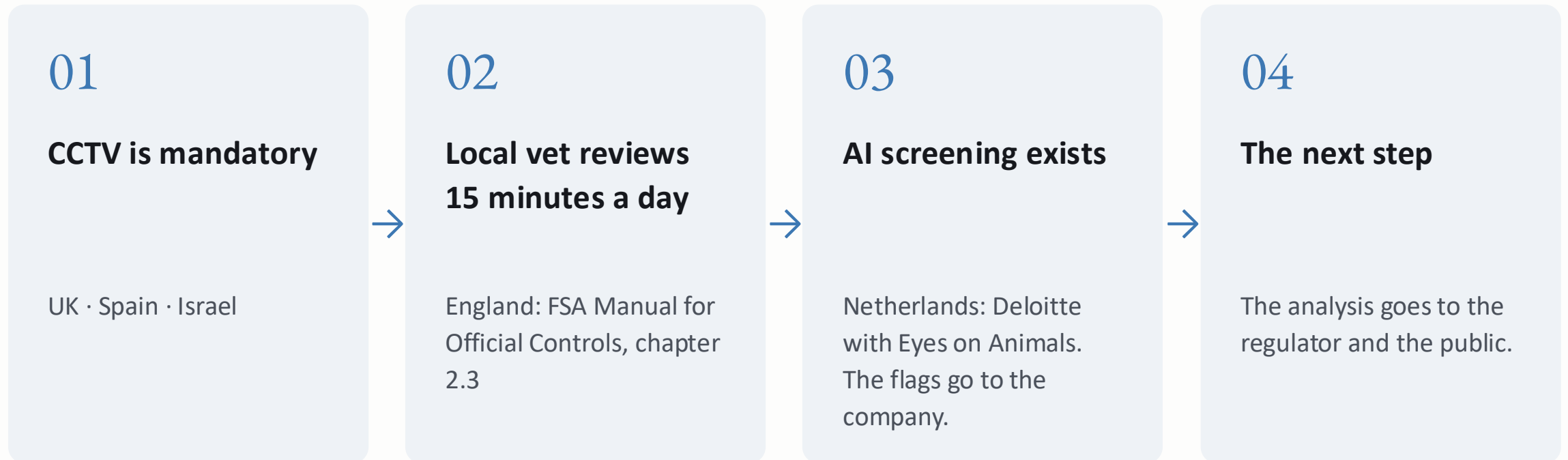
- which systems are in use
- on what share of the farms
- how they are configured
- what the outcomes were

The data already exists. The ask is that it flows out.

The windows

- EU welfare-law revision: laying hens and broilers, proposal by end 2026 · pigs, mid-2027 – both with “practical on-farm welfare indicators”
- UK Animal Sentience Committee: first submission on AI and animals, October 2026 (the sandboxing powers) – co-sign, or file your own version
- On the EU side: Eurogroup for Animals · Anima International

The regulators: using AI to enforce existing law



As an instrument, AI helps enforce existing welfare law.

Arguments against this approach

01

AI helps animals faster than rules do

Then anything that slows adoption costs welfare; a 2026 review lists not using AI as a welfare risk in itself (Jarvis-Campbell et al.). I think disclosure does not slow adoption, but I cannot show it.

02

Disclosure without enforcement changes nothing

Scotland has published salmon mortality figures under a voluntary scheme since 2018. The deaths continued.

03

Wrong layer

If models come to make most of the decisions about animals, the deployment work is a detour and we should just focus on the model layer.

The field needs...

01

Knowledge of AI deployments and failures

An observatory of AI uses on animals
· the incident record. Regulators act
on what can be shown.

02

Knowledge of the windows

The instruments, the dates, the
doors. A gap map of EU and UK
openings, October 2026.

03

Policy asks and connections

Positions on what to ask for, one per
organisation or several across the
movement; and the people who
write the rules, in Brussels and in
London.

On the policy side: about a dozen people. None of the advocacy organisations interviewed has an adopted position on AI, and none has more than one person on it.

Ways to contribute

If you are at an animal organisation

- the gap map of EU and UK openings, October
- briefs and templates to file under your own name
- the Animal Sentience Committee submission: co-sign, or file your own version
- the Stakeholders' Catalogue: an afternoon

If you work on AI governance

One paragraph on non-human welfare, in ...

- the risk taxonomy you maintain
- the evaluation you run
- the impact-assessment template you write
- the consultation response you are drafting

Animals are the cleanest test of whether a framework covers affected parties who cannot speak for themselves.

THE WINDOWS

AI is in the barn and in the water. The policy windows are open.

GPAI Code of Practice

review due 2027

EU welfare-law revision

laying hens and broilers by end 2026, pigs by mid-2027

UK Animal Sentience Committee

first submission October 2026

Thank you! · aigah.org · henrike@aigah.org

Some literature

- Coghlan & Parker, [“Harm to Nonhuman Animals from AI: a Systematic Account and Framework”](#), Philosophy & Technology, 2023 – the harm taxonomy
- Rethink Priorities, [“How AI is affecting farmed aquatic animals”](#), parts 1–3, 2025–26 – innovation, deployment, welfare
- Kaņepājs et al., [“AnimalHarmBench”](#), FAccT 2025 · CaML, [CompassionBench](#) – the benchmark family
- Tse, Moret, Ziesche & Singer, [“AI Alignment: The Case for Including Animals”](#), Philosophy & Technology, 2025
- Jarvis-Campbell et al., [“Mitigating AI-related animal welfare risks in animal farming”](#), Computers and Electronics in Agriculture, 2026 (open access)
- Boyland, Kiminiūtė & Birch, [“AI in farming must put animal welfare first”](#), LSE European Politics blog, August 2026
- [aigah.org](#) – the gap map is up in October, and [the newsletter](#)