

Dear Madam/Sir

I welcome the current review of poultry animal welfare standards, which is long overdue, and trust that the outcome will provide noticeable welfare improvements for poultry.

A most pressing issue involving a great number of birds relates to layer hen housing. Given personal constraints, I will comment only on layer hen housing.

Glossary

General comment: The word 'reasonable' is vague and undefined. For example: **“access to water - a reasonable opportunity for poultry to be able to drink water of a suitable quality and quantity to maintain their hydration.”** 'Reasonable' can be interpreted differently by different individuals and has the potential to detrimentally affect the welfare of birds if loosely interpreted.

The Glossary includes a description of the 3 systems of egg production: conventional cages, free range (non-cage systems) and housing systems (non-cage systems). The description of 'cages' states: **“A system of housing where the birds are confined to cages either singly or in multiples with a wire floor. With this system the birds do not come into contact with their own or other bird's faeces which is an important disease control feature.”** I believe the statement I have italicised should be removed as it is not part of the description but rather a judgment. If it remains, then free-range/non cage systems/housing should include the statement that they allow birds to stretch and flap their wing and walk, which are important welfare attributes of non-cage systems (and, according to the *Farmed Bird Welfare Science Review*, some basic movements that are prohibited in conventional cages also contribute to bird health).

'Barn' systems are mentioned as one of 3 egg-production systems on p.11 (Principles of poultry welfare) but 'barn' is not qualified or included in the glossary.

Perches – GB 1.14 – I cannot see that the guideline gives a context. This would not be possible in a conventional cage system and the statement could implicitly mean that a system that does not allow perches should not be permitted

GB 1.14 Perches should be provided at all times.

Comment on layer hen housing:

It is particularly disappointing that the long-awaited review does not include a commitment to phase out conventional (battery) cages for layer hens.

It has long been known that conventional cages are detrimental to layer hen welfare and do not allow birds to carry out a number of natural behaviours such as stretching, flapping wings, and dust bathing. Their extreme confinement and lack of movement predisposes them to osteoporosis and painful broken bones, particularly when they are removed from cages.

A brief overview of welfare considerations in the supporting document *Farmed Bird Welfare Science Review* LH11 – pp 59-60 lists the poor welfare provisions of cages:

Conventional cages:

- prevent birds from performing basic movements essential for good health;
- deny birds the possibility of expressing their behavioural needs to roost, nest and forage or their motivation to dust-bathe;
- lack of exercise weakens bones which are likely to fracture during depopulation and leads to metabolic conditions such as haemorrhagic fatty liver syndrome;
- the general benefits of conventional cage systems are largely equaled or surpassed in furnished systems;
- immune function appears to be suppressed in conventional cages;
- levels of aggression are higher in conventional cage systems;
- the welfare problems of conventional cages are substantial

All layer hen systems require conscientious husbandry and monitoring. Cage systems favour industry as they require fewer workers and less intervention. However, a well-managed non-cage/free-range system provides the opportunity for better bird welfare and more behavioural opportunities and should be the goal.

Cages have been banned in Switzerland since 1992. They have been banned in the European Union (EU) since 2012 and independently by a number of individual member states prior to the EU ban. New Zealand and Canada are in the process of a phase-out. A number of States in the U.S. are taking similar steps, several major retailers in the U.S. and Australia have committed to non-cage eggs and according to the RSPCA nearly 100 companies have stopped sourcing eggs from battery cages.

The Report of the Scientific Veterinary Committee, (SVC) Animal Welfare Section, on the Welfare of Laying Hens, Brussels, 30th October 1996 condemned conventional cages because of their "inherent severe disadvantages for the welfare of hens". EU Council Directive 1999/74/EC on the Welfare of Laying Hens subsequently came into force on 1 January 2012 prohibiting the use of conventional (battery) cages in the EU.

<https://publications.parliament.uk/pa/cm201012/cmselect/cmenvfru/830/83004.htm>

[2] http://www.animalwelfarestandards.net.au/files/2015/07/FINAL_2016-08-The-welfare-of-layer-hens-in-cage-and-cage-free-housing-systems-FINAL.pdf