

To Whom it May Concern

I feel strongly about ending caged hens and their continual exploitation for the production of eggs for the community.

They cannot stretch their wings, forage and peck and utilise all their natural instincts in a confined cage.

Keeping hens in cages is not necessary- they deserve the chance and the RIGHT to roam free during the day and still have freedom to move at night in large, secure and safe barns protected from their predators.

They provide us with eggs, we have an obligation to provide a safe and humane environment where they can just be hens.

So I wholeheartedly support the goal to improve hen welfare and in so doing end the battery cage forever which is cruel and unnecessary.

We have an opportunity to set the benchmark and raise standards in egg production for other nations and end this cruelty.

As living creatures they have the right to live in the way they were meant to live!

I strongly support the recommendations from the RSPCA- although the first point I feel battery cages should end immediately!

- **RSPCA recommendation** that a standard be included in chapter B1 – Laying Chickens to ensure that battery cages for layer hens are phased out, and a standard included in Part A – 4 Facilities and Equipment, to prohibit housing any birds in conventional cages.
- **The provision of litter and dustbaths** -There is no standard requiring that poultry be provided with litter for the purpose of dustbathing and foraging. This needs to be addressed.- **RSPCA recommendation:** The inclusion of a standard in Chapter 8 – Litter

management that ensures all poultry housed indoors must have access to a littered area to allow birds to forage and dustbathe.

- **The provision of perches-** There are proposed guidelines recommending that perches be provided. However, these are no standards, and will therefore cannot be enforceable.-
RSPCA recommendation: The inclusion of a standard in chapter 4 – Facilities and equipment to ensure adequate perch space must be provided to all poultry with a motivation to perch.
- **Minimum light levels** -The proposed standards allow poultry to be kept in near-dark conditions for most of their lives, not allowing the expression of normal behaviours and eye development, and without adequate light and dark periods for normal behaviour and rest. This treatment is inhumane as birds must have access to normal light throughout the day.-
RSPCA recommendation: The amending of standard SA6.3 in chapter 6 – Lighting to ensure that the minimum light intensities for all poultry be increased to at least 10 lux, and amending standard SA6.5 to require 8 hours of continuous darkness in each 24 hour period for all poultry.
- **Nests for layer hens-** There are proposed guidelines recommending sufficient nests for hens, but these will not be enforceable. **RSPCA recommendation:** The RSPCA urgently recommends that guideline GB1.6 become a standard in Chapter 4 – facilities and equipment to ensure that hens of all species must be provided with a nest.
- **More space per bird.** The proposed standards for minimum space allowance for birds are inadequate as they do not give birds enough space to move freely or carry out normal behaviours.- **RSPCA recommendation:** Maximum stocking densities be decreased for all species, so that each individual bird has more room to move and express its normal behaviours.
- **No forced moulting.** The proposed standards allow forced moulting where birds coming towards end-of-lay undergo a period of stress because of a sudden change in feed and, as a result, lose a large amount of feathers and body weight. -**RSPCA recommendation:** Standards must be introduced to ensure that poultry are not forced to moult.
- **Revision to standards on beak-trimming and bill trimming.-** The proposed standards for beak and bill trimming of poultry do not acknowledge the pain associated with this procedure. This practice is painful and cruel for the birds.- **RSPCA recommendation:** Stricter standards must be introduced around beak and bill-trimming to ensure that it is not performed unless necessary for animal welfare reasons, and it is performed appropriately, with minimal impacts on the birds.
- **More standards on stunning, slaughter and on-farm killing.** The proposed standards must better safeguard the welfare of poultry at abattoirs and on-farm.- **RSPCA recommendation:** More requirements are needed in chapter 11 – poultry at slaughtering establishments to

ensure welfare at abattoirs, and to prevent failures. This includes specifications for electrical waterbath and controlled atmosphere stunning systems, a requirement for CCTV cameras in all abattoirs, and designated animal welfare officers in all abattoirs. More requirements are also needed in chapter 10 – humane killing to include unacceptable methods.

Please do what is right so that these birds live a more humane life without cruelty.

Yours sincerely

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