



PVSGEU response to the EFSA opinion on welfare of laying hens on farm.

The Poultry Veterinary Study Group of the EU (PVSGEU) welcomes the opportunity to respond to the EFSA Scientific Opinion on the above topic.

The PVSG is a formally constituted group of about 90 European specialised poultry veterinarians, with practical responsibility for the health, welfare, production and food safety aspects of most European poultry production. PVSG has existed for over 50 years and the members are mostly working as private practitioners or are sometimes working for a company (breeding companies, integrations, hatcheries, pharmaceutical companies). Government veterinarians are not eligible for membership. The following 23 countries are currently represented in the PVSG: Austria, Belgium, Bulgaria, Cyprus, Denmark, Estonia, Germany, Finland, France, Germany, Great Britain, Greece, Hungary, Ireland, Italy, Latvia, Netherlands, Norway, Poland, Portugal, Romania, Spain, Sweden, Switzerland.

Summary:

The EFSA report is a comprehensive review of the published science on the welfare of commercial layers and layer breeders on farm and this should be welcomed as an aid to assist producers, legislators and consumers in decisions to continuously improve the welfare of commercial layers. However, the conclusions and recommendations of the EFSA committee are limited solely to welfare outcomes and do not consider the wider implications for sustainable poultry production, food security and environment which is a primary aim of the EU Green Deal Strategy and Farm to Fork initiative. Egg producers in many countries across Europe have made considerable investment in colony/furnished cages with the implementation of Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens as this ruled that conventional cages should no longer be used for egg production in the EU. This considerable investment has not yet been recouped by those countries that responded to this Directive. EFSA are now recommending that **all** types of cage systems should be banned.

Productivity is higher in furnished cage systems compared to alternative systems and the EFSA report clearly shows that for at least one of the ABM (on bone breakages) shows this to be considerably lower in caged systems compared to alternate systems. Furthermore, smothering (piling) is not seen in cage systems, whereas it can be a significant cause of mortality and distress in alternative systems. If further improvements in bone strength can be achieved through genetic selection and nutrition, it

is likely that even more bone breakages in furnished cage systems could be eliminated. In the opinion of PVSGEU the introduction of a total ban on cages across Europe is premature and unwise at this time. Its implementation in all markets is likely to lead to a prolonged period of adjustment which could lead to poorer welfare outcomes, distortion of the market and have an adverse effect on food security across the EU. PVSGEU considers that decisions on a total move away from caged systems should be made on a country-by-country basis in response to consumer demands in those countries and the ability to implement appropriate alternative systems suited to their internal market, land availability, climate and management infrastructures. In the meantime, Member States should be mindful of the detailed ABMs identified in this EFSA report to ensure that animal welfare can continue to be monitored and maintained in **ALL** systems. This is most likely to lead to stepwise improvements in laying hen welfare, food security and consumer expectations across the EU.

The welfare deficits of beak trimming are discussed in the report albeit the evidence for infrared beak treatment causing welfare deficits is considerably weaker than the evidence for using hot blade beak trimming. Although by definition, beak treatment is a mutilation considerable research has indicated no long-term welfare issues. PVSGEU agree that if everything on the farm is ideal beak trimming may be eliminated. However, we are veterinary surgeons working in the real world and despite the fact that poultry farmers work to make conditions ideal, triggers of injurious pecking in flocks with intact beaks, as well as those following beak treatment, still occur. Therefore, PVSGEU agree that breeding companies should be encouraged to breed strains with less propensity to exhibit unwanted pecking behaviour, and for those with blunter beaks, and for the further development of other techniques for non-invasive beak blunting. However, for the foreseeable future PVSGEU are of the opinion that infra-red beak treatment should be allowed to continue until such time that reliable methods can be consistently implemented to ensure that hens avoid suffering the severe welfare consequences of injurious pecking. Hot blade beak trimming should be discontinued as a routine procedure and only be available under veterinary supervision as an emergency intervention in flocks experiencing significant and unavoidable injurious pecking.

PVSGEU are concerned that implementing these recommendations related to welfare without caveats or further work prior to implementation will lead to poorer welfare and will also mean that egg producers in the EU will not be able to compete with producers from 3rd countries resulting in the relocation of egg production away from Europe which will ultimately, not improve bird welfare. Furthermore, the availability of eggs and egg products as nutritious, low carbon and affordable source of animal protein in EU will inevitably be compromised and potentially less available to a large proportion of the EU population. As veterinary surgeons we are committed to a sustainable One Health strategy, a major component of which is a nutritious diet which should be available to all world citizens.

Introduction:

EFSA have produced a report on commercial layers and layer breeder welfare. The report is a comprehensive review of the published welfare science related to laying hens. The report presents conclusions and recommendations to improve welfare, however the report does not consider the wider societal, environmental and animal health implications of these recommendations. This is somewhat surprising as the rationale for this review is in part driven by the EU strategy for sustainable food production, the Green Deal and Farm to Fork. Furthermore, the report does not consider in detail the most important factor in improving animal welfare which applies across all

livestock species, which is the quality and capability of the farmer/animal keeper management. The implementation of these recommendations will have far reaching implications for EU food production and food security. It would almost certainly result in animal protein production being relocated to third countries with the associated risk to food supply to EU citizens. Relocating animal protein production to third countries will NOT result in overall improvements in animal welfare as those countries will continue to be able to rear animals to the standards accepted in those countries.

Key recommendations in the commercial layer and layer breeder welfare report:

House all birds in non-cage systems.

Council Directive 1999/74/EC of 19 July 1999 laying down minimum standards for the protection of laying hens required EU producers to stop using conventional cages for egg production and install furnished cages with minimum provision for space, height, nest, perch and scratch area provision. Welfare of laying hens has improved significantly with the provision of furnished cages but the EFSA recommendation to house all birds in non-cage systems will result in some welfare compromises. Smothering which occurs in non-caged systems resulting in mortality and welfare compromise, rarely occurs in caged birds. Breastbone breakages as a result of impact injuries are much less common in furnished cage housed birds than alternate systems. Internal parasite loading in birds housed in cages is much lower than birds that have access to litter systems. These points indicate the number of welfare consequences in moving birds out of cage systems.

*Some EU countries have already implemented total bans on cage production, in response to public and consumer concerns. Such decisions undoubtedly led to a period of adjustment in implementing management systems to ensure that welfare could be maintained, and experience has not always been positive in the early stages of such change. Other countries have opted for either barn or free-range alternatives to cage systems in response to more specific consumer demands, and as the report identifies such moves bring with them their own relative welfare issues. In the opinion of PVSGEU the introduction of a total ban on cages across Europe is premature and unwise. Its implementation in all markets is likely to lead to a prolonged period of adjustment which could lead to poorer welfare outcomes, distortion of the market and have an adverse effect on food security across the EU. Although these latter points may not be considered a specific welfare concern it is likely to influence the importation of eggs and egg products into the EU from Third countries where there is a lack of control on the welfare standards of animals. PVSGEU considers that decisions on a total move away from caged systems should be made on a country-by-country basis in response to consumer demands in those countries and the ability to implement appropriate alternative systems suited to their internal market, land availability, climate and management infrastructures. In the meantime, Member States should be mindful of the detailed ABMs identified in this EFSA report to ensure that animal welfare can continue to be monitored and maintained in **ALL** systems. This is most likely to lead to stepwise improvements in laying hen welfare, food security and consumer expectations across the EU.*

Primary breeding companies use cages to house birds when they are selecting for certain genetic traits that require precise individual identity eg egg production and Feed conversion efficiency. PVSGEU believe that to ensure continuous genetic improvement it is important cages should still be available to breeding companies for these assessments.

Implement protocols to define welfare trait information (e.g., keel bone fractures and plumage condition) for all commercial hybrids to encourage further progress in genetic selection and to

enable producers to choose strains with a reduced risk of bone lesions and soft tissue lesions and integument damage.

PVSGEU agree that genetic selection to improve welfare traits should be supported and encouraged. Defining traits can be challenging and selection for one trait can have negative consequences for other valuable traits.

Provide dry and friable litter, available at all times, supplemented by the provision of new litter material and other enrichments that support comfort and exploratory behaviour, naturally shorten beaks and reduce the risk of injurious pecking.

PVSGEU fully support the provision of a range of enrichments to encourage exploratory behaviour and support bird comfort. The availability of friable litter that can be manipulated by hens when foraging is highly significant in reducing the risk of injurious pecking and is supported. Injurious pecking is a major welfare compromise for laying hens and thus any measures that can be introduced to the environment that can avoid this behaviour should be encouraged.

Implementing all preventive measures against injurious pecking should be done to facilitate a phasing out of beak trimming.

PVSGEU agree that injurious pecking is probably one of the major welfare compromises to modern laying hen strains. Preventative measures should be encouraged and implemented, and it would be desirable to eliminate the need for beak trimming, however at this point in time PVSGEU believe it is better to allow infra-red beak treatment until such time that reliable methods can be implemented to ensure that hens consistently avoid suffering the severe welfare consequences of injurious pecking. Hot blade beak trimming should be discontinued as a routine procedure and only be available under veterinary supervision as an intervention in flocks experiencing significant and unavoidable injurious pecking.

House flocks with easily accessible, elevated platforms and/or perches to permit simultaneous resting by all birds, and to enable birds to avoid or escape each other.

PVSGEU agree with this recommendation.

Provide a covered veranda for all birds to reduce effective/local stocking density during daytime periods when birds are most active, and permit birds to choose between temperatures, light conditions and substrate quality. This would reduce the risk of the welfare consequences inability to perform foraging, exploratory and comfort behaviour. Compared to an outdoor range, the risk of predation stress, gastroenteric disorders and other infectious diseases in case of outbreaks in the MS will be reduced. In climates where a covered veranda cannot be provided, provide extra space to birds.

The EFSA opinion does not define a “veranda” and it would be helpful for producers and veterinarians to understand what EFSA means by “veranda”. However, in principle PVSGEU does not agree that verandas should be provided as a routine, but if producers can attain a premium for their product by the provision of verandas, then this should be supported. However, verandas and pop holes can have significant impacts on the ventilation capacity and capability of the housing. Since litter management is reliant on the control of the house environment and litter quality is crucial to bird welfare it should

not be a requirement to provide verandas. The recommendation to provide extra space per bird if verandas are not provided will make EU producers less competitive than producers in third countries. Simply providing greater space allowance will not necessarily improve welfare.

Implement harmonised assessment methods and scoring systems for monitoring mortality on farm and wounds, plumage damage, keel bone fractures and carcass condemnation at slaughter. Such tools can be used to monitor welfare level across farms in Europe.

PVSGEU agree with this proposal.

Rear pullets with dark brooders to reduce fearfulness during rearing and the subsequent laying period. Rear them in a system allowing the development of navigation skills.

It is well recognised that rearing pullets in housing that mirrors the housing that they will be housed in during lay has significant welfare benefits as the birds learn to use the system, this especially true for multitier systems. Familiarising the birds with this system in rear results in better movement of the birds through the system. This results in less episodes of injurious pecking and bullying of less dominant birds within the flock. Research has shown some welfare benefits with dark brooders, however PVSGEU believes more research is required before legislating for their implementation.

In layer breeders: reduce male aggression to females e.g. by reducing proportion of males included in flocks (below 1:10), selecting male birds for reduced aggression, include partition panel to allow female to escape males and ensure synchrony in sexual maturity of both sexes.

PVSGEU agree that these are simple management procedures that can be implemented to improve bird welfare in laying flocks. However, this is nothing new and is standard management practice currently implemented across the EU.

Conclusions:



In conclusion, PVSGEU consider the EFSA report to be a comprehensive review of the published welfare science related to commercial layers and layer breeders. The report presents conclusions and recommendations to improve welfare, however the report does not consider the wider societal, environmental and animal health implications of these recommendations. This is somewhat surprising as the rationale for this review is in part driven by the EU strategy for sustainable food production, the Green Deal and Farm to Fork. Furthermore, the report does not consider in detail the most important factor in improving animal welfare which applies across all livestock species, which is the quality and capability of the farmer/animal keeper management. PVSGEU fully endorse some of the recommendations however PVSGEU consider that some of the recommendations would have far reaching implications for EU food production and food security, without clear trade-offs in terms of improving hen welfare in EU flocks.

In the opinion of PVSGEU the introduction of a total ban on cages across Europe is premature and unwise at this time. Its implementation in all markets is likely to lead to a prolonged period of adjustment which could lead to poorer welfare outcomes, distortion of the market and have an adverse effect on food security across the EU. PVSGEU considers that decisions on a total move away from caged systems should be made on a country-by-country basis in response to consumer demands

in those countries and the ability to implement appropriate alternative systems suited to their internal market, land availability, climate and management infrastructures. In the meantime, Member States should be mindful of the detailed ABMs identified in this EFSA report to ensure that animal welfare can continue to be monitored and maintained in ALL systems. This is most likely to lead to stepwise improvements in laying hen welfare, food security and consumer expectations across the EU.

PVSGEU is a group of specialist veterinary surgeons serving the poultry sector in Europe. We are committed to a One Health Strategy as has been evidenced by our drive to reduce antimicrobial use in poultry production across Europe and promote sustainable welfare improvements in poultry production. However, a major component of One Health is a nutritious, safe diet and poultry products are a major contributor to a healthy diet. We believe it is imperative that this should be available to all world citizens without negatively impacting on environmental health. Some of the recommendations in the EFSA report are directly contrary to environmental sustainability and for this reason we cannot support those recommendations.

27 April 2023

	
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References:

<https://www.efsa.europa.eu/en/efsajournal/pub/7789>