PVSGE position paper on EFSA Scientific opinion on welfare of turkeys on farm. May 27th 2026

The PVSGE 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 60 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 24 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.

The Poultry Veterinary Study Group of Europe (PVSGE) welcomes the opportunity to respond to the EFSA opinion on the welfare of turkeys on farm (2026).

Summary

The Scientific Opinion on the welfare of turkeys on farm (2026) provides a scientific overview of currently applied turkey husbandry conditions and associated animal welfare risks. It transparently identifies evident scientific gaps and the resulting uncertainties in recommendations regarding specific aspects. Further research is needed for the development of evidence based and reliable recommendations to protect and improve turkey welfare. Given the potential significance of regulatory decisions, it is necessary to supplement assessments and recommendations with objective, reproducible, and large-scale data, since expert opinions - especially when based on a very small number of respondents - can only partially address the complexity of the issue. Only measures that are proven to have the desired effect of improving turkey welfare through evidence-based outcomes should be implemented.

Introduction

On 3 February 2026, the European Food Safety Authority (EFSA) published its scientific opinion on animal welfare in Turkeys, commissioned by the EU Commission. https://doi.org/10.2903/j.efsa.2026.9851

The procedure used to prepare the Scientific Opinion on turkeys was the same as that used for previous SO's for other animal species (commissioning scientists to conduct a literature review, summary and evaluation based on found literature, theoretical models and expert interviews). Due to criticism of this approach, a stakeholder engagement was introduced for this Opinion (kick-off event, call for evidence, ad-hoc hearings). Except for the breeding sector, no targeted consultations of external experts on specific issues took place. No farmers nor field veterinarians were involved in the preparation of the report. Consequently, the Scientific Opinion fails to consider the practical implementation of certain recommendations. The drafting process itself remained a EFSA responsibility. Until publication of the report, it remained unclear which scientific and other publications were included in the evaluation process.

According to the Terms of reference given by the European Commission, EFSA focused exclusively on assessing animal-welfare risks related to current husbandry conditions in turkeys performed in the EU based on available literature. Aspects like sustainability, food security, environmental impact and economic feasibility were therefore not in the scope of the report. Focusing exclusively on potential risks gives the reader a fundamentally negative impression of turkey farming, even though various exploratory visits conducted by DG SANTE have positively recognized the turkey sector's numerous efforts regarding animal welfare in Europe.

General comments

The EFSA Scientific Opinion on the assessment of turkey welfare constitutes a comprehensive scientific synthesis, but it also makes clear that further research is needed in many key areas to substantiate recommendations. Specifically, there is a lack of current, objective, and Europe-wide standardized data in numerous areas. A fundamental issue also exists in the limited literature available on questions concerning turkeys, which is necessary for species-specific considerations. To close existing knowledge gaps, findings from other poultry species, particularly broiler chickens, are often used. However, the transferability of these findings to turkeys has not been systematically examined.

Under husbandry conditions, the environment provides animals with essential protective functions, such as continuous access to feed and water, veterinary care, protection from weather conditions and predators, as well as a structured health management system. A major disappointment in the Opinion process is that it fails to consider the highly significant positive welfare aspects of stockmanship and the farmers' ability to recognize and mitigate negative influences in the environment through husbandry and management skills. Stress is almost exclusively rated as negative although it is a highly effective evolutionary mechanism to trigger fitness, adaptability and survival.

Space allowance

With regard to 'optimal' stocking density calculations, the used approach contains a high level of uncertainty. Precise data on interindividual distances in turkeys are still lacking. To address the knowledge gaps in the literature, EFSA employed a structured process of expert consultation (expert knowledge elicitation) involving 5 to 6 experts. This approach included the creation of evidence dossiers containing all available data on the subject, which served as the basis for the experts to individually estimate key parameters such as required floor space and individual distances, including uncertainty ranges (credible range). In subsequent group discussions, a consensus value was determined for each parameter, which was then used as the basis for calculations. As a result of this approach, the model shows a high level of uncertainty in these areas. The assumptions made in the theoretical model with no animal contact, homogenous distribution and unlimited space available neither reflect the actual behavior of turkeys nor apparent constraints in animal husbandry. Studies on broiler chickens show that avoiding physical contact does not automatically equate to avoiding stress, as stress reactions are actually context-dependent and influenced by various factors (Kim et al., 2024). The same applies with turkeys, based on observations and previous practical experiences from numerous research projects. Recent methodological approaches in broilers aim to reduce existing uncertainties in animal distribution—and thus in space requirements—through automated imaging and sensor technologies (e.g., computer vision analyses to capture individual distances and space usage), thereby empirically supporting model-based assumptions (Calderone et al., 2025). For turkeys, however, systematic implementation of such data-driven models is still in its infancy (Ju et al., 2020) and requires further investigation.

Furthermore, the use of combined approaches can link behavior-based space models with objective animal welfare indicators (e.g., lesions, mortality, activity patterns) in order to quantify their functional relevance. Additionally, the approach chosen by EFSA disregards all other influencing factors and makes turkeys farming extremely costly and finally impracticable. A clear positive influence of low stocking densities on certain health and welfare parameters is still lacking (Erasmus, 2017), especially low stocking densities may be associated with increased aggressiveness followed by higher mortality (Jhetam et al., 2022).

Beak trimming

PVSGE acknowledges EFSA's recommendation to implement strategies to prevent injurious pecking before phasing out beak trimming. However, the experiences on good practices from EU Member States where beak trimming has been omitted for decades, was available and could have been easily collected by targeted consultations of external experts from those countries, evaluated and included in the recommendations. At the same time, external experts would have been able to discuss practical implications with regard to the recommendation of gradual reduction of light intensity during the photoperiod in Louisiana-type barns with continuous daylight access and passive ventilation which represent the majority of barns in certain countries.

The Opinion assumes negative long-term consequences such as pain or suffering caused by trimming the upper beak in turkeys, although the cited literature does not provide reliable scientific evidence for this assumption. References used to support the assumption are mainly on chicken and date back to a period prior to the year 2000. This approach neglects fundamental methodological differences in methods (scissors, hot blades, biobeaker) used till the year 2000 as well as the impact of procedures applied at later time points in life than day 1 and bigger beak areas treated than today (Gentle, 2011). Even the subsequent widespread use of infrared beak treatment (IRBT) in hatcheries since then had significant methodological differences between species (whole-beak treatment in chickens versus upper-beak-only treatment in turkeys). Finally, further improvements of the IRBT method in turkeys in recent years (Graue et al., 2024) have not been acknowledged. In the light of recent publications, the assumption made on long term pain in turkeys is not based on scientific evidence.
There is also no reference to the fact that the introduction of IRBT has enabled farmers to rear turkeys in higher light intensity without triggering injurious pecking

Thinning

In turkey production, brood-and-move systems are common practise. According to breed, sex and production system, birds are given more space at certain time points during grow out to allow for optimal growth. This is usually done by moving a certain number of birds (either males or females or parts of them) to new barns, allowing the remaining birds to occupy the additional free space. Due to different breeds used and different slaughter ages of males and females, production systems and stocking densities vary greatly within the EU. Independent of production systems used, maximum stocking densities for males and females are always reached at time of thinning or final slaughter.

Light conditions

With regard to light intensity, the EFSA requirements are still specified in lux, although it does not provide any information about the spectral composition of the light. Furthermore, this unit is based on human perception and does not take into account the UV spectrum visible to poultry, making it only partially suitable for setting poultry-specific recommendations. Proposed units such as Gallilux capture these wavelength ranges (Kämmerling, 2016).

Hatchery conditions

PVSGE agrees that early access to feed and water is important. However, the proposed maximum 48-hour timeframe does not fully reflect the operational realities of hatchery management and transport across the EU, where logistics and distances can vary significantly.
In practice, hatchery already aims to minimise the time between hatching and placement, and day-old poults are physiologically adapted to cope with a limited period post-hatch through residual yolk reserves. The focus should be on minimising time to placement in practice, rather than introducing a strict maximum threshold that may not be feasible in all situations. PVSGE considered that if a maximum timeframe has to be set, it would be more consistent with transport legislation if this timeframe remained at 72hours.

Genetic selection and breeding strategies

With regard to the recommendation on leg health, PVSGE do not think that this is based on current practical knowledge. Progress in terms of robustness and mobility, which has been achieved through balanced breeding programs over the last 20 years have not been considered. In practice, modern turkey breeding programs already balance multiple traits, including health, robustness and welfare, alongside production efficiency. Productivity and welfare are not inherently conflicting, and, in many cases, improved performance supports better animal health and overall welfare outcomes. Adjustments should be science-based, data-driven and developed in collaboration with breeding experts, fully accounting for genetic correlations and avoiding unintended negative consequences.

Animal Based Measures

According to the mandate, EFSA focused on data on ABM's only at the time of slaughter. However, a comprehensive assessment should also take into account the rearing conditions, that is, the animal in its environment, since the combination of the expertise of the caretaking stockmen and the use of indicators allows for timely and effective action for the welfare of the animal at any time.

PVSGE do not consider runts as an ABM for hunger, usually being related to chronic impairments such as infected yolk sac remnants. Likewise, head shaking is not considered an appropriate ABM for respiratory distress relating more to measures such as sneezing, coughing, sinusitis, airsacculitis or pneumonia.

Conclusions:

In conclusion, PVSGE welcomes this Scientific Opinion from EFSA on Welfare of Turkeys however it is disappointed that certain stakeholder groups such as field veterinarians with specific turkey expertise were not consulted during the information gathering process. Furthermore, it is clear that much more research is needed into turkey welfare to ensure the correct decisions are made about any legislative changes. It is not necessarily appropriate to extrapolate results of welfare studies from chickens to turkeys as their behavioural traits are significantly different.

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