

BVA and BVPA response to Scottish Government's proposal to phase out the use of cages in Scotland's laying hen sector

19 June 2024

Introduction

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,500 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) The British Veterinary Poultry Association (BVPA) is an active non-territorial division of BVA. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
- 3) We welcome the opportunity to contribute to the consultation on the Scottish Government's proposal to phase out the use of cages in Scotland's laying hen sector.

Animal Welfare

Q1. a) Do you think that a ban on cages and a move to non-cage systems will allow birds to better express their normal behaviours?

Answers – Yes, Partially, No.

4) Yes.

Q1. b) Please explain your answer to Q1. a).

- 5) We consider that animals used by humans should have, at least, 'a life worth living', but preferably a 'good life'.
- 6) We support the Five Domains model for welfare assessment, which includes:
 - Nutrition
 - Physical Environment
 - Health
 - Behavioural Interactions (including interactions with the environment, interactions with other animals, and interactions with humans)
 - Mental/emotional state
- 7) The model differs from that of the 'Five Freedoms' and 'Five Needs' by distinguishing between the physical and functional factors that influence an animal's welfare and the overall mental/emotional or 'affective' state of the animal arising from these factors.
- 8) Production systems should offer stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest, and confidence; and excellent health outcomes.
- 9) Current enriched cage systems do offer a significant improvement for hen welfare compared to the barren systems that were in place until 2012, allowing hens the potential to nest, roost, scratch and stretch. Although they do go some way in addressing the welfare needs of laying hens, the needs that are met are basic at best and a whole host of issues are still present with the enriched cages system such as:
 - Limited mobility which negatively affects the skeletal quality and development of layer hens.
 - Inability to perform any comfort behaviours including foraging and dust bathing due to space restrictions and lack of suitable litter substrate.

- Increased risk and incidence of metabolic diseases, such as fatty liver haemorrhagic syndrome which is associated with increased feed intake with minimal exercise.
- Inability to escape aggression from other hens.

- 10)** There is considerable evidence demonstrating that cage free systems, such as free-range, offers laying hens improved welfare conditions compared to the enriched cages. Having more space both indoor and outdoor means laying hens are able to dust bathe which helps hens clean and maintain feathers, remove parasites and oil build up and regulate their body temperature.
- 11)** Similarly, a free-range system allows hens to forage, which is another natural behaviour where hens explore their surroundings by pecking the ground or suitable litter substrates. This is severely limited in the enriched cage systems. For both of these natural behaviours it was found that providing suitable litter substrate in the first 4 weeks of life for hens helped reduce the occurrence of severe and injurious feather pecking in commercial flocks. This is something that cannot be offered effectively in a cage system.

Q2. a) Do you think that housing birds in non-cage systems will improve other welfare outcomes in addition to normal behaviours?

Answers - Yes, Partially, No.

12) Yes.

Q2. b) Please explain your answer to Q2. a).

- 13)** Removing laying hens from cages will help address the negative outcomes listed in our response to Q1 part b.
- 14)** More space both indoor and outdoor will allow hens to move around more freely helping skeletal development and muscular maintenance of layer hens. At the very least it will help prevent the deleterious impacts currently being experienced by having hens inside cages that limit movement significantly more. The increased range of movement will also reduce the risk and incidence of metabolic diseases, such as fatty liver haemorrhagic syndrome which is associated with increased feed intake and minimal exercise.
- 15)** Although the increased flock sizes that come with barn housing or free-range may lead to issues around hen pecking orders that can be detrimental to health and welfare, the increased space compared to an enriched cage does mean hens can feasibly escape aggression from other hens more effectively in a non-caged system, which is a clear improvement on welfare.

Policy proposal

Q3. a) Do you agree with our proposal to introduce a ban on the installation of new enriched cages across the laying hen sector (laying hens, pullets and breeder layers) in 2030?

Answers - Yes, No, it is too early, No, I don't agree with a ban

16) Yes.

Q3. b) Please explain your answer to Q3. a).

- 17)** It is the view of BVA and BVPA that these cages should be banned and there should be a transition to free-range, organic or barn systems. All of the alternatives have their own issues but offer significant improvements for the welfare of laying hens.
- 18)** In the UK, year on year the total percentage of laying hens kept in enriched cages has dropped from around 40-45% of the flock which were held in cages in 2007 to less than a third in 2024.¹ In addition to this, a poll carried out by YouGov and Compassion in World Farming in 2020 found that 88% of the British public believe using cages in farming is cruel to farm animals. In response to a significant campaign by "End the Cage Age", which garnered 1.4 million signatures from EU citizens, on the 30 June 2021 the EU Commission committed to phase out and eventually ban caged farming in Europe, which will include cages for laying hens, by 2027. Although recently it has been announced that the EU intends to pause progress towards a ban following a hard pushback from certain farming groups, this legislative proposal is now anticipated for 2024.

¹ <https://www.gov.uk/government/statistics/egg-statistics/quarterly-uk-statistics-about-eggs-statistics-notice-data-to-march-2024#uk-egg-packing-volumes-methods-of-production-uk-country-breakdowns-and-price-statistics>

- 19) The current cage system was brought in as an attempt to address the significantly poor health and welfare outcomes for hens kept in barren cages whilst also maintaining productivity. These enriched colony systems provide a basic level of support for the hens kept within them and as we move towards higher welfare systems as a society, we simply cannot allow these cages to remain in place. They provide the bare minimum at best and as organisations concerned with the welfare of animals, we believe that the alternative husbandry systems such as free-range, organic and barn housing provide a far better quality of life for laying hens.
- 20) Additionally, modern day systems have much better biosecurity measures and flock health programs so confinement systems are less relevant from egg hygiene and flock health perspectives compared to when they were initially introduced.
- 21) With the statistics and consumer feedback mentioned above, and this Scottish Government consultation, it is clear the direction of travel is moving away from cages for laying hens. One of the first key steps in this regard is banning the installation of new enriched cages which is why we support it.

Q4. a) Do you agree that a 10-year transition period, starting in 2024 to a full ban on enriched cages in Scotland across the laying hen sector in 2034 (laying hens, pullets and breeder layers) is the right phase in period?

Answers – Yes, No it is too long, No, it is too short, No, I don't agree with a ban

22) Yes.

Q4. b) Please explain your answer to Q4. a).

- 23) There is a degree of difficulty deciding on the length of time for a transition period due to several factors. The evidence we have included above demonstrates a clear direction of travel from the public and as it says within this consultation document, retail has either already phased out shell egg products from caged laying hens or they plan to. It could be that the process will be phased out by market pressures rather than government intervention so the transition period should be shorter to hasten the end of this harmful husbandry practice. Having an unnecessarily long transition period could also disincentivise producers who were already planning to make the shift away from caged systems before a ban was announced. They may decide instead of doing it over the next couple of years with the market they may use the government date as their deadline for change instead.
- 24) However, there is no guarantee that the entire industry would make this shift and therefore a government ban with a considerable transition period is necessary to drive change across the sector. This must be done at a pace where industry is able to absorb costs and make the necessary changes to maintain supply so we do not end up exporting the animal welfare issue abroad. It would be incredibly counter productive if a transition period was brought in that was too short, resulting in egg producers being unable to adjust fast enough and make up the shortfall, leading to eggs being brought in from elsewhere using the very system that has just been banned in Scotland.
- 25) A final point to consider here is the rate of change across the other UK nations. Given the nature of the UK and cross border presence of large retailers, a ban in Scotland which will likely increase costs, especially in the initial stages, may mean companies will choose to buy their eggs at a cheaper rate in enriched cage systems in England, Northern Ireland and Wales. This could drive Scottish egg farmers out of business which again is counterproductive. It is unlikely to be a significant issue because, as we have described, the view of most people across the UK is that these systems must go, so Scotland may lead the way with other nations following suit shortly after. However, this must be kept in mind when bringing in any kind of ban on these systems in Scotland.
- 26) Therefore, we believe that 10 years is the right length of time for a transition to a ban on cages for laying hens. It marries up with the cycle for laying hens, it is a long enough window to allow industry time to adjust and it is short enough that it provides impetus to encourage producers to make the changes that will likely be brought about by market pressures anyway.

Q5. a) Do you agree with the proposal to ban (barren) battery cages in 2030: for smaller scale commercial units or hobby-keepers with fewer than 350 laying hens?

Answers – Yes, No

27) No.

Q5. b) Please explain your answer to Q5. a)

28) We support a ban but think the proposed timeframe is too long. These are changes that should have been made years ago when they were banned for laying hen commercial units. A ban on these systems should be introduced much sooner.

29) Barren battery cages struggle to meet basic health and welfare needs of the hens kept within them. This was a significant reason in why they were banned for large scale commercial units. The issues with the cages remain the same regardless of the size of the flock and should not be used in any circumstance. Even a handful of hens kept in one of these cages are stuck in an environment that does not allow them to engage in any natural behaviours and steps must be taken to change this.

Q6. a) Do you agree with the proposal to ban (barren) battery cages in 2030: for breeder layers?

Answers – Yes, No

30) No.

Q6. b Please explain your answer to Q6. a

31) Please see answer to Question 5 part b.

Q7. a) Do you agree with the proposal to ban (barren) battery cages in 2030: for pullets?

Answers – Yes, No

32) No.

Q7. b) Please explain your answer to Q7. a)

33) Please see answer to Question 5 part b.

Questions 8 to 23 are industry related.