



RSPCA 2025 NATURAL DAYLIGHT STANDARD

SURVEY RESULTS

A PUBLICATION BY THE BRITISH FREE RANGE EGG PRODUCERS ASSOCIATION

Introduction

The BFREPA Board were keen to better understand how the changes announced by the RSPCA in early April would impact on members.

Before that could be established it was agreed that the first phase would be to produce a scenario booklet with a focus on the natural daylight standard given that it was believed that this would have the greatest impact based on member feedback and interest. It was also believed that there was some misunderstanding around this standard particularly concerning the installation of windows to achieve the natural daylight standard. The BFREPA scenario booklet was emailed to members and published on the BFREPA website in mid-May.

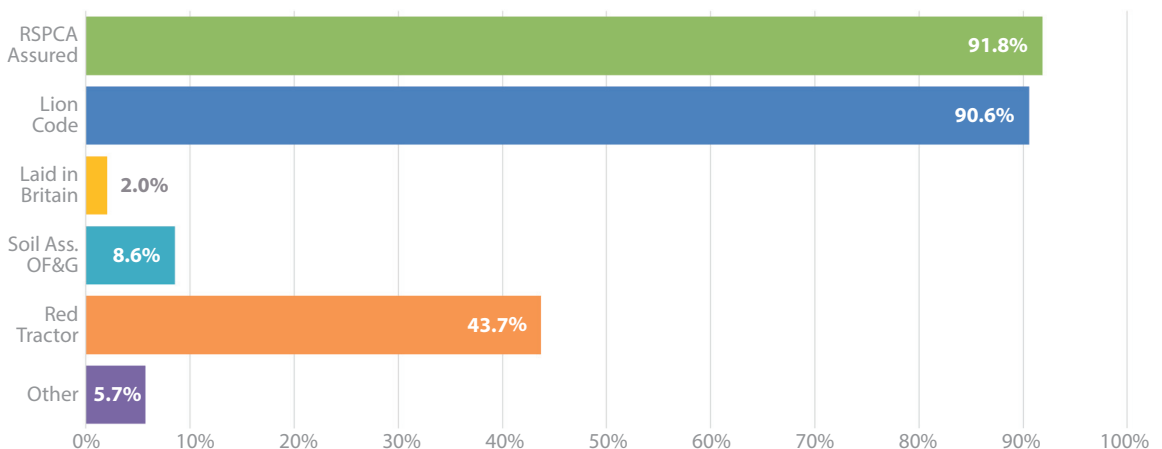
The second phase of understanding the impact on our members was to create a member survey. This survey ran throughout the month

of June closing on 30th June. It had three elements: firstly information about our members eg what assurance schemes are you a member of and an indication of bird numbers (to help us better understand what % of the free range sector was represented by the survey); a series of questions covering the standards that, based on feedback, members were concerned about and finally, a series of questions on farm assurance to help shape our policy work going forward.

In all 252 members completed the survey making it statistically significant. The survey responses and a summary are given in the following pages below each survey question. The Board are indebted to our members that completed the survey as it has given a clear insight into member's views and how the RSPCA 2025 standard impacts on their business and will be used to shape our engagement with the RSPCA and policy work.

Q1 Are you a member of any accreditation scheme?

Answers:

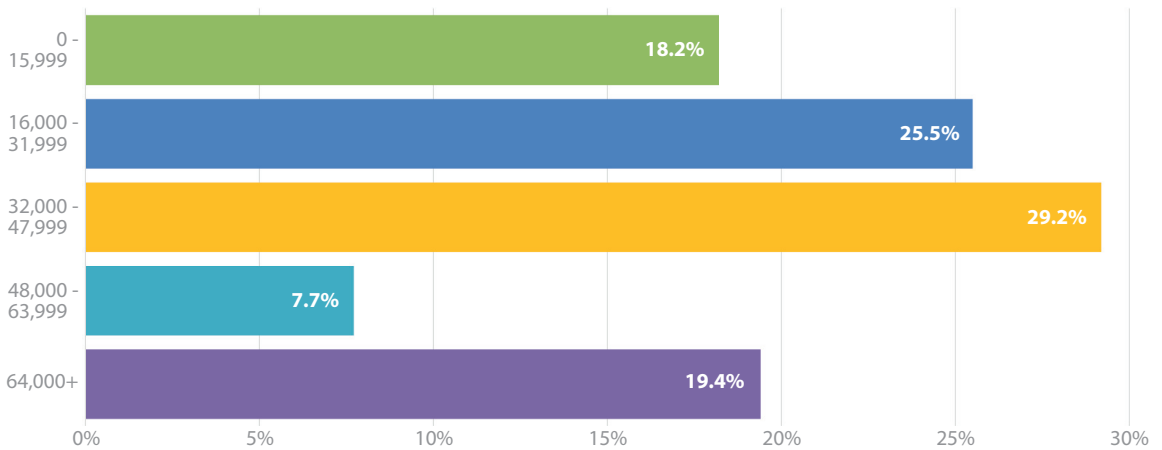


Conclusion:

In line with assumed membership figures, 90% of those who replied stated they were Lion-registered and, in turn, RSPCA Assured. Those multi-enterprise farms also said they were members of other farming organisations, such as Red Tractor. The "other" responses consisted of; *Government egg inspector, Arable, Dairy, TASCC, FABL, None (x 5), NI Farm Quality Assurance, Organic Food Federation (x 3) and Leaf.*

Q2 How many free range birds do you have?

Answers:

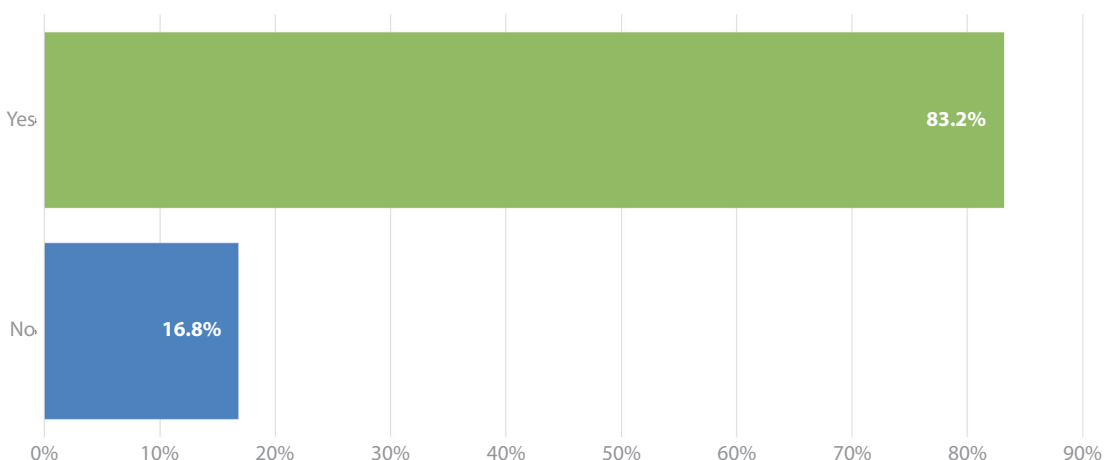


Conclusion:

This is consistent with the profile of our membership base where the average member flock size is 32,000 birds. The results also show that the survey responses were spread throughout the sector, by size, and therefore representative of all members.

Q3 Have you looked at the BFREPA explanatory notes on Natural Daylight?

Answers:

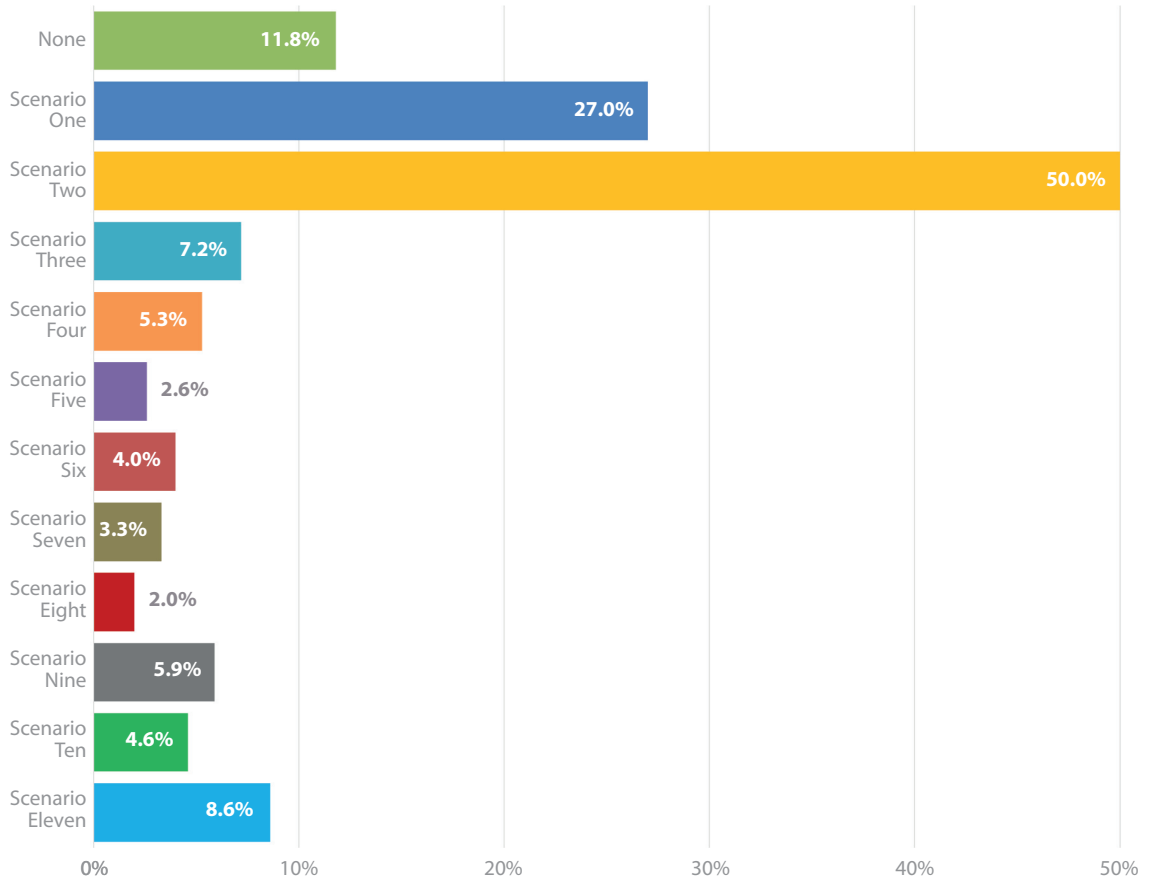


Conclusion:

We encourage those members that have not yet seen the scenario booklet to please read it. The file can be found at www.bfrepa.co.uk/rspca

Q4 If 'yes' which of the 11 scenarios do you fit into (and this maybe more than one if you have more than one shed and/or are planning to submit plans for expansion)? Please give the scenario number.

Answers:



Conclusion:

This question focused on what impact would the natural daylight standard have on your shed. The most 'popular' response accounting for 50% of members was the situation described by scenario 2 - "natural daylight in the shed corresponding to below 3.0% of the total floor area. The producer is not planning any changes to their shed, internally or externally, other than normal/routine maintenance which may include replacing the feeders or drinkers. In this situation, members have until 1 January 2035 to achieve the natural daylight standard of 3.0% and that can be achieved through, for example, putting a window or a non-ranging pop hole in the bird service area of the shed."

The next highest response was scenario 1 - 27% of members responded that they are already compliant with the new standard i.e they have natural daylight in their shed corresponding to 3.0% or over of the total floor area.

The third highest response - 8% of members – was the naturally ventilated shed scenario (scenario 11) and, by virtue of the fact that with naturally ventilated sheds ventilation inlets

count toward the amount of light entering the shed, these members were compliant with the 3.0% natural daylight standard.

The next highest response was scenario 3 which applied to 7% of members – this described an internal refurbishment being undertaken after 1 October 2025 which would trigger the 3.0% natural daylight standard being met, at the time of the refurbishment, by, for example, installing a window(s)/non-ranging pop hole e.g. in the bird service area.

12% of members responding to the survey were new sheds either currently being built or at the planning stage.

The survey response to this question suggests that 4/10 existing sheds will already comply with the 3.0% natural daylight standard (scenarios 1 & 11) leaving 6/10 having to make changes to meet the standard albeit the majority of these (56%), based on current plans of no internal or external changes, have until January 2035.

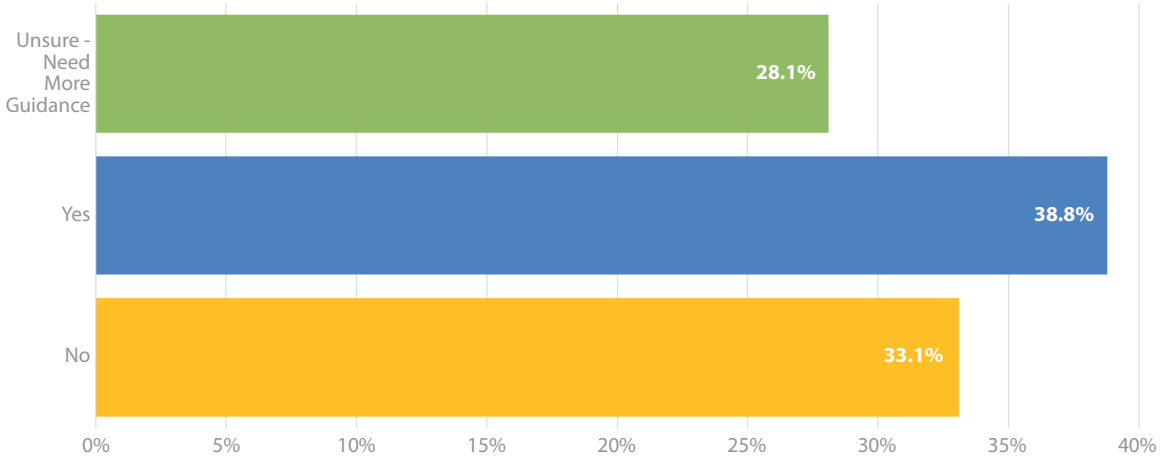
Q5 If none of the scenarios apply to you, please can you describe your scenario, as we are keen to create new scenarios if appropriate.

Comments (from open ended answers):

Thank you for the feedback. We will work through the responses.

Q6 Do you believe you could manage your birds in a Housing Order?

Answers:

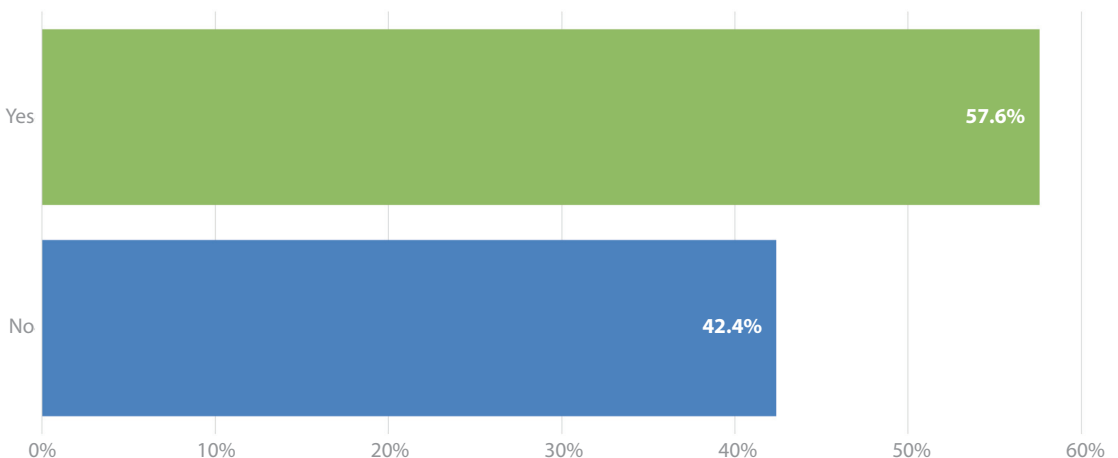


Conclusion:

A mixed result with 'yes' just the majority answer. That said, the 'unsure' members could easily tip the balance to 'no'. We are seeking further practical guidance and liaising with the RSPCA/RSPCA Assured on this. Many members are concerned about the impact on bird welfare such as smothering, which has led to the RSPCA agreeing to pause the implementation of this standard pending the outcome of case studies which will be conducted later this year (subject to a Housing Order being implemented by the government).

Q7 Have you worked out your natural light percentage?

Answers:

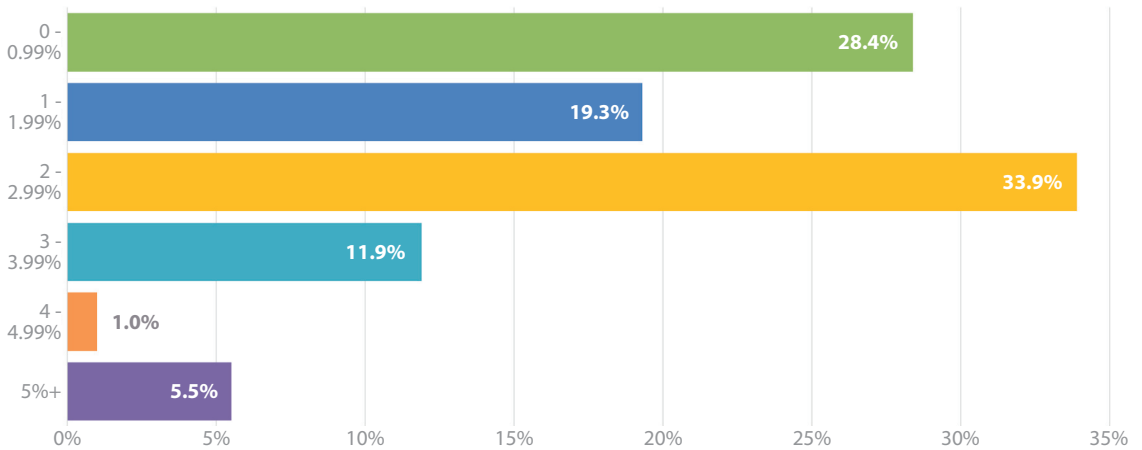


Conclusion:

It is perhaps surprising that only 6/10 members completing the survey have worked out their own %. It may be that the calculation needs to be clearer or even more accessible. That said if members are not planning any internal or external changes to their sheds then they have up to ten years to make the necessary changes (if indeed they have to) e.g a window or non-ranging pop hole in the service area.

Q8 What percentage did you calculate for your shed(s)?

Answers:



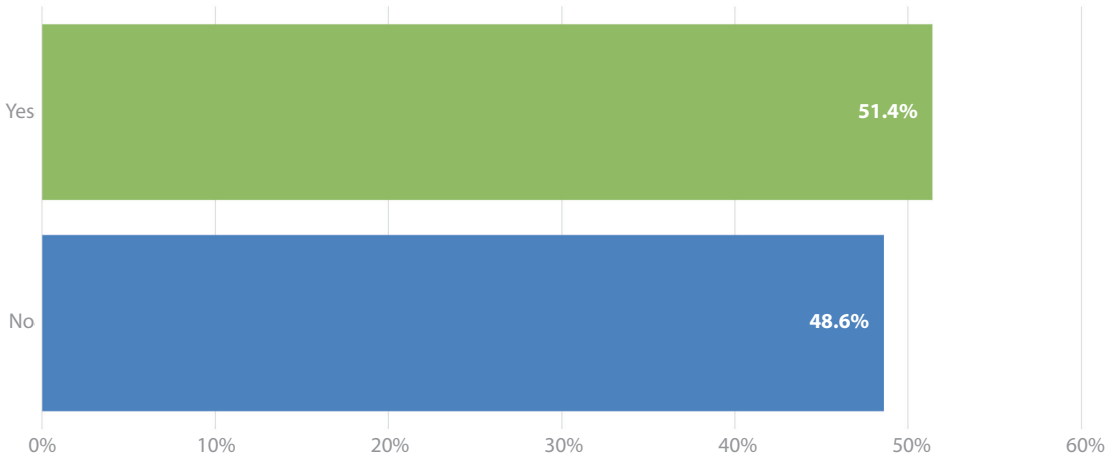
Conclusion:

The majority of members were, as expected based on feedback ahead of the survey, in the 2-2.99% range. Specifically regarding this survey question, those in the 3.0%+ categories and therefore already complying with the natural daylight standard amounted to 18.4% of respondents or nearly 1 in 5. This group will include naturally ventilated sheds. The 0-0.99% at 28% of respondents is a surprise in that the figure (result) looks very low and merits further investigation. This survey question suggests that 8/10 members will have to increase their natural daylight into the shed to be compliant with the 2025 natural daylight standard (however, for the majority, based on Q4 responses, they will have until January 2035).

Please note; this survey question response differs from the response to Q4 in that, with Q8 nearly 20% of existing sheds comply with the 3.0% natural daylight standard, whereas in Q4 the figure is 40%.

Q9 Do you currently have 20% cover on your range?

Answers:

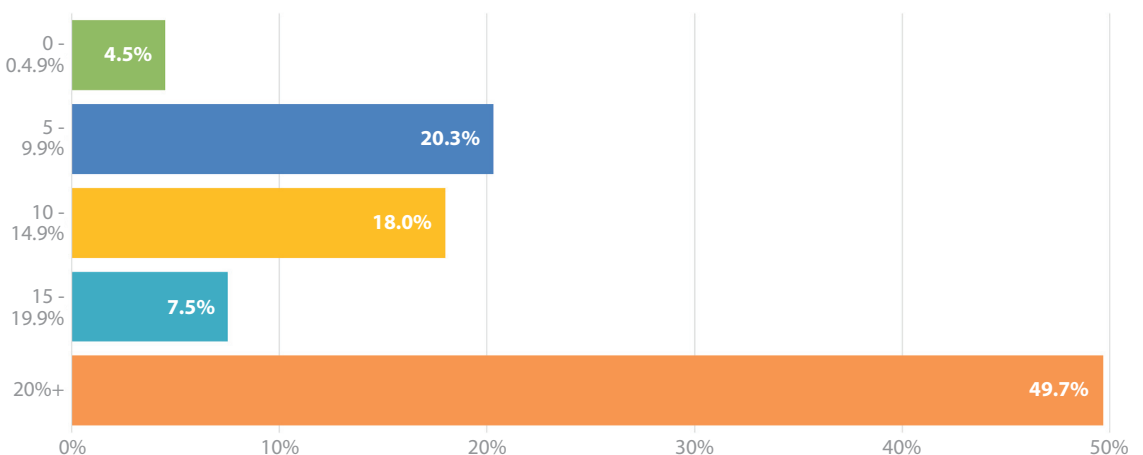


Conclusion:

An even split suggesting that on the face of it, this should be less of an overall challenge for our membership. That said this standard has created concerns, with tenant farmers in particular needing support in terms of what crops can be grown and how to comply. Please see question 11 (i) below.

Q10 What percentage cover do you have on your range?

Answers:

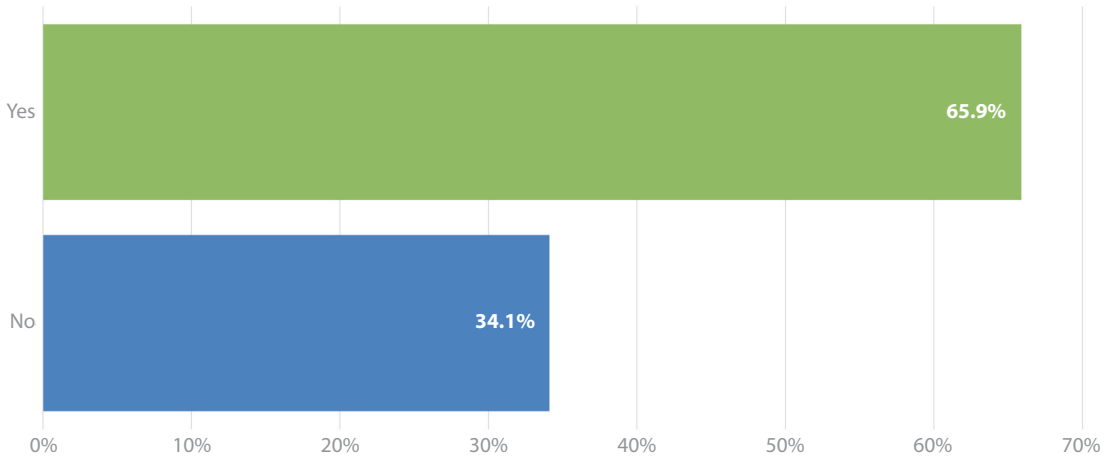


Conclusion:

25% of our members have less than 10%. This is where the focus needs to be over the next two planting seasons. Equally, we need to understand if the 10-20% category, who represent 25% of respondents, have a particular problem in attaining the 20% standard.

Q11(i) If you are below 20%, could you achieve 20% cover by 01/05/27?

Answers:

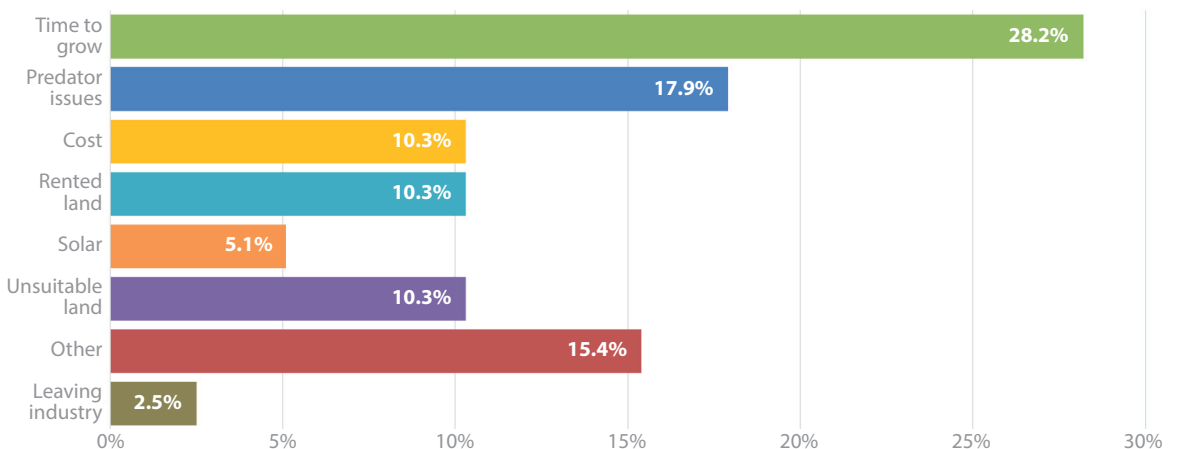


Conclusion:

It is encouraging that two thirds of our members who currently do not meet the standard believe that they could achieve the standard by May 2027. The concern is the 34% of members that believe that they could not achieve the standard by May 2027 and these members need particular support over the next two planting seasons.

Q11(ii) Reasons for not being able to reach 20% cover:

Answers:

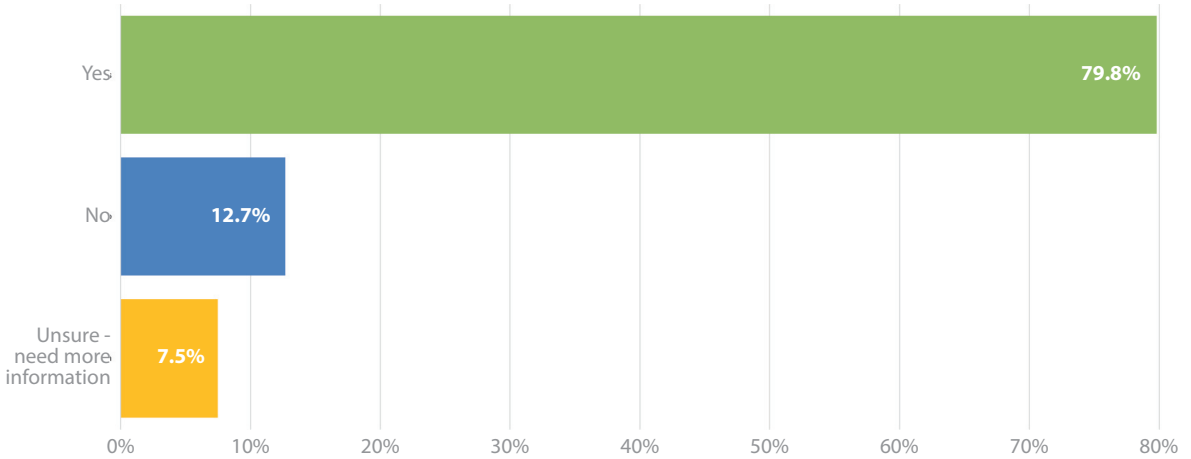


Conclusion:

It was interesting that 28% of respondents cited time to grow. The RSPCA have given until May 2027 to address this concern and so it will be interesting to explore this in more detail. The predator concern was expressed on the BFREPA roadshows held earlier this year and is a strongly held view. Solar arrays have not previously been raised and is another aspect that needs further consideration.

Q12 Do you agree that a welfare assurance scheme is needed in our sector?

Answers:

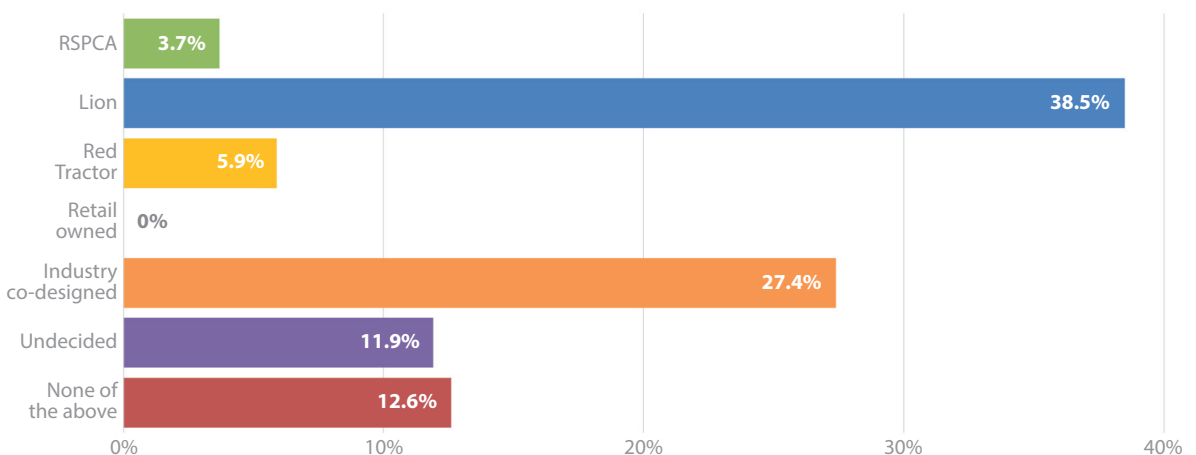


Conclusion:

Despite the 'bad press' that farm assurance schemes have attracted over the past 18 months or so, it is interesting and encouraging that 80% of respondents believe that, in principal, a welfare scheme is needed in our sector.

Q13 As a principal who should operate such a scheme?

Answers:

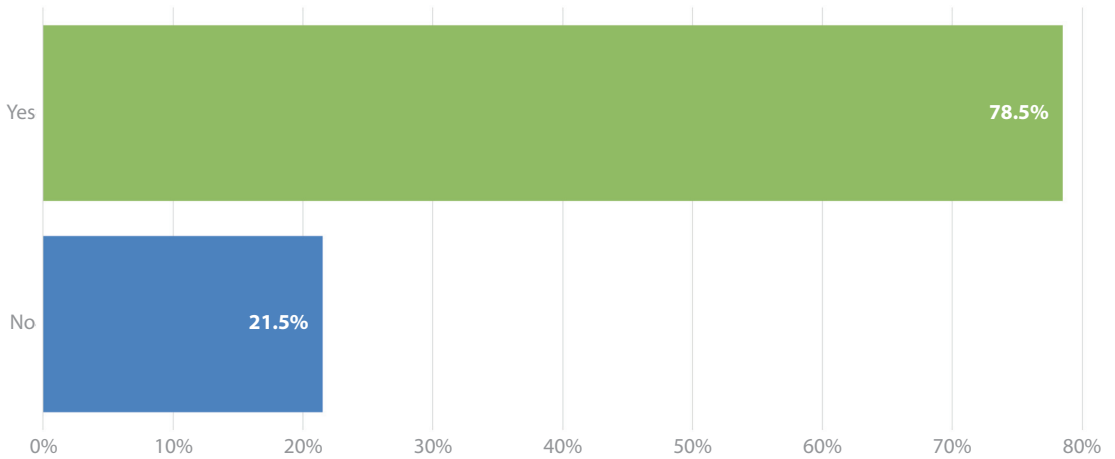


Conclusion:

The most popular response was Lion COP. This mirrors the feedback since the RSPCA published their amended standards in November 2023, and the feedback that we received from members who attended our roadshows earlier this year. Just over 1 in 4 respondents believed that an industry scheme was preferred. The near 25% of respondents who were either undecided/needed more information and the 'none of the above' represents a sizeable response rate and is worthy of further investigation.

Q14 Is there a role for BFREPA to initiate a welfare scheme?

Answers:

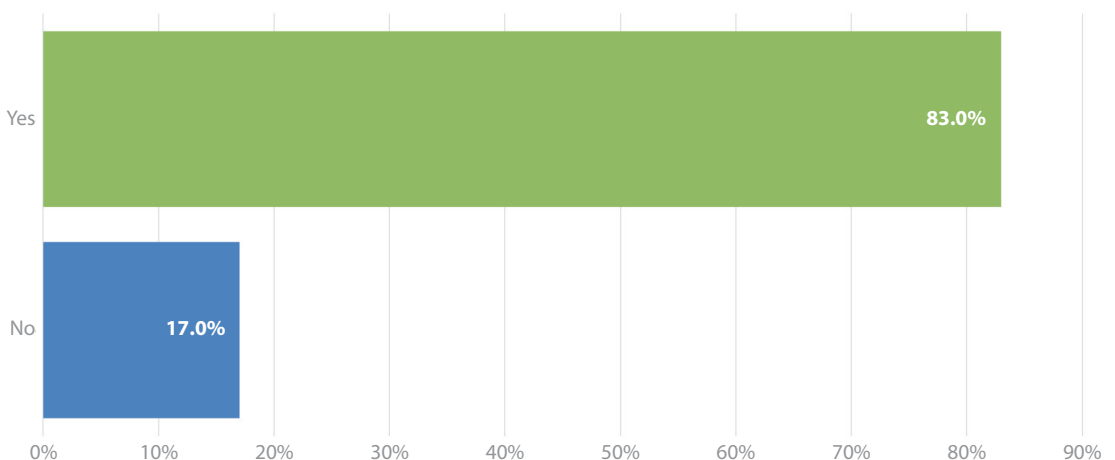


Conclusion:

An overwhelming response of nearly 80% were in support of BFREPA being involved. The reason behind the 1 in 5 respondents saying 'no' would be worth exploring to better understand their concern(s).

Q15 Should the industry and stakeholders co-design a new scheme?

Answers:

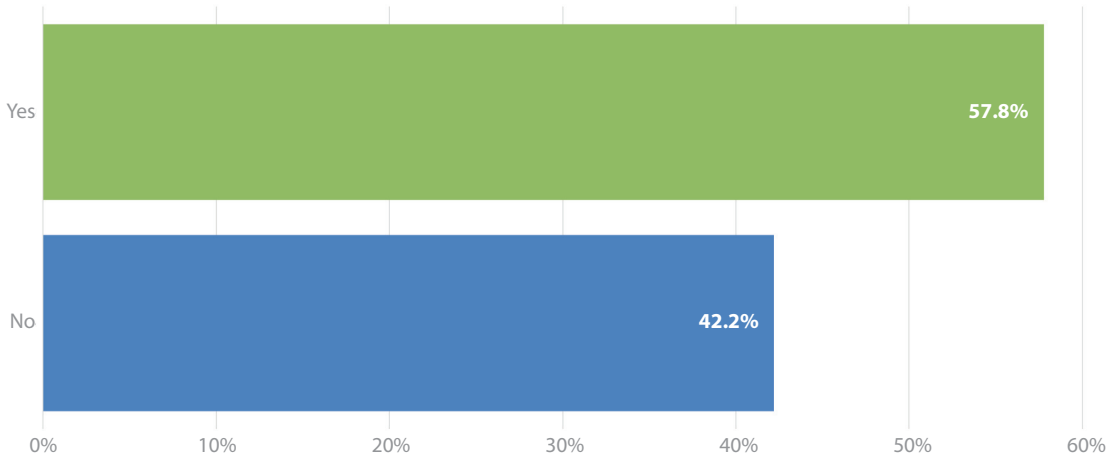


Conclusion:

An overwhelming response in favour of this approach.

Q16 Should the new scheme be handed to an independent body to maintain?

Answers:

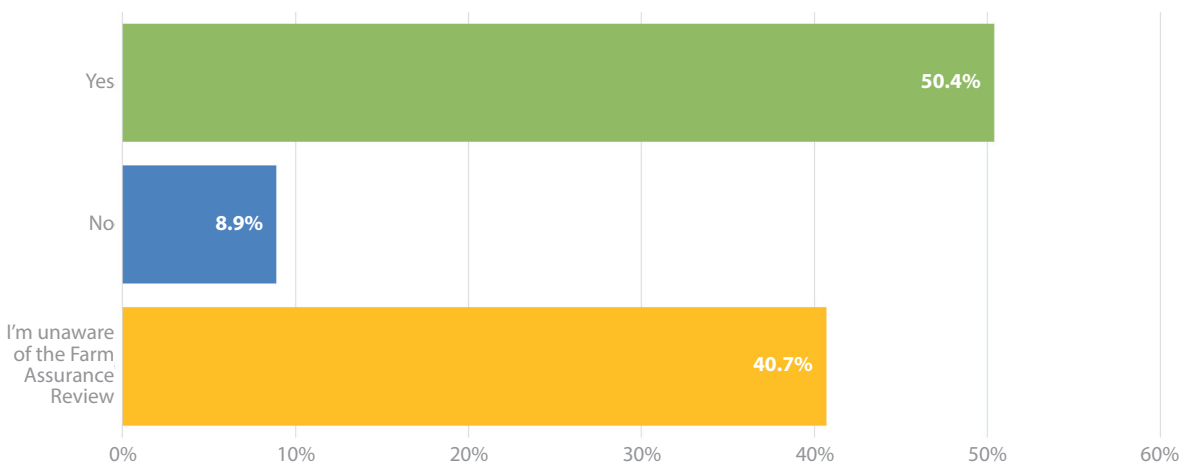


Conclusion:

Nearly 6/10 members responded 'yes' to this question which is an endorsement of the importance of independence (much like the costings service). The key questions are what are the criteria for selecting an 'independent body' and who would provide this? Further, how would this body review and determine new standards?

Q17 Should such a scheme follow the principles of the Farm Assurance Review?

Answers:



Conclusion:

Of those members that voted there was an overwhelming response in favour of following the Farm Assurance Review (FAR) recommendations (with 5x as many respondents in favour compared to those that responded 'no'). The surprise here is that 4/10 respondents were not aware of the FAR despite the publicity in the agricultural press.