



RSPCA 2025 NATURAL DAYLIGHT STANDARD

WORKED EXAMPLES

THIS BOOKLET REFLECTS OUR DISCUSSIONS WITH THE RSPCA ASSURED AS AT 25TH APRIL 2025. BOTH RSPCA AND RSPCA ASSURED HAVE CONFIRMED THE CASE STUDIES CONTAINED IN THIS DOCUMENT

BFREPA are not endorsing the RSPCA 2025 standard. BFREPA are producing this booklet purely to help assist our members to understand the new natural daylight standard through a series of scenarios and additional information.

A PUBLICATION BY THE BRITISH FREE RANGE EGG PRODUCERS ASSOCIATION



INTRODUCTION

The RSPCA have implemented a natural daylight requirement in their 2025 standards published on 11 April. The new standards come into effect from 11th July 2025. We have compiled this document for our members to help them to understand, through a series of worked examples or scenarios, what the natural daylight standard means on their farm. If you have any questions or would like additional examples please contact gary.ford@bfrepa.co.uk

The RSPCA Assured's Laying hen members hub also has examples as well as a tool that you can use to calculate the % of natural daylight for your own shed(s).

When planning any changes we STRONGLY recommend that members contact RSPCA for guidance at

farmingengagement@rspcaassured.org.uk

For policy matters contact gary.ford@bfrepa.co.uk

Ever since the standards were published in November 2023, BFREPA, together with the industry trade associations, have sought to engage with the RSPCA and offer constructive feedback to its proposals. We have managed to achieve some significant change:

ORIGINAL 2023 STANDARD	REVISED 2025 STANDARD
✗ Windows in existing sheds required by 1 January 2030	✓ NO RETROFITTING of windows to existing sheds where there is no change externally to the building
✗ Pop holes cannot be used to count toward the provision of natural daylight	✓ Pop holes CAN be used to count toward the provision of natural daylight
✗ Veranda required	✓ Veranda NOT required

DEFINITIONS

The RSPCA definitions of an internal refurbishment and structural refurbishment will be explained later in the document with the different scenarios:

An **internal refurbishment** is defined as:

- a full system or near full system change, such as the replacement of an existing multi-tier system with a new multi-tier system or any change that results in a system being removed and then returned e.g. the replacement of nest boxes.
- any change to the system that results in an increase in bird numbers (e.g. the replacement of an existing flat deck system with a multi-tier system).
- the extension of an existing building to incorporate an additional flock.

An internal refurbishment does not include the replacement of accessories such as drinkers, feeders, perches, ventilation or lighting systems.

A **structural refurbishment** is defined as any refurbishment that involves a change to the structure of the building such as the removal of wall(s) or a change in wall or roof height. It includes any situation where planning permission is required to repair any damage to a building, e.g. when caused by fire, flood or storm damage.

The RSPCA have a natural daylight calculator which can be found here:
<https://business.rspcaassured.org.uk/member-information-hub/laying-hen-members-hub/natural-daylight/>

DEROGATION

What if the 3.0% minimum natural daylight standard cannot be achieved through refurbishment by 1st January 2035?

RSPCA Assured have confirmed that, "If the 3.0% minimum natural daylight standard cannot be reasonably and realistically achieved through refurbishment by 1st January 2035, a five year derogation will be open to applicants from mid 2034, if they can commit to refurbishing to 3.0% natural daylight by 2040. Any member granted a derogation will be subject to certain conditions."



SCENARIO 1

A producer has natural daylight in their shed corresponding to **3.0% or OVER** of the total floor area.

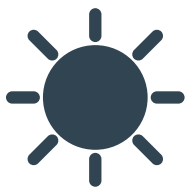
They are not planning any changes to their shed, internally or externally, other than normal/routine maintenance which may include replacing the feeders or drinkers.

Question: What changes need to be made to comply with the new standard?

Answer:

The producer does not need to make any changes as they are already meeting the 2025 natural daylight standard.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 2

A producer has natural daylight in their shed corresponding to **BELOW 3.0%** of the total floor area. They are not planning any changes to their shed, internally or externally, other than normal/routine maintenance which may include replacing the feeders or drinkers.

Question: What changes need to be made to comply with the new standard?

Answer:

By **1 January 2035** natural daylight corresponding to 3.0% or more of the total floor area has to be achieved. This can be met through the popholes e.g. by extending the popholes or by adding another opportunity for a light opening or finding a place to put a window(s)/non-ranging pop hole e.g. the bird service area such as the gable end (excluding the egg/packing room).

As this is an existing shed the producer does not need to install windows to be compliant with the new 2025 RSPCA Standard.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 3

A producer has natural daylight in their shed corresponding to below 3.0% of the total floor area. They are replacing their **nest boxes** i.e. an **internal refurbishment**.

Question: What changes need to be made to comply with the new standard?

Answer:

Any internal refurbishment (see definitions) made between 1st October 2025 and 1st January 2035 will trigger the requirement to provide natural daylight by 3.0% of the floor area being met through for example the **popholes** e.g. by extending the popholes at the time that the nest boxes are changed or by adding another opportunity for a light opening or finding a place to put a window(s)/non-ranging pop hole e.g. the bird service area such as the gable end (excluding the egg/packing room).

The existing popholes would still count towards the 3.0% requirement.

As this is an existing shed the producer does not need to install windows to be compliant with the new 2025 RSPCA Standard.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 4

A producer has natural daylight in their shed corresponding to below 3.0% of the total floor area. They are replacing their **flat deck with multi-tier** i.e. an internal refurbishment and there are no structural changes required to the building.

Question: What changes need to be made to comply with the new standard?

Answer:

Any internal refurbishment made between 1st October 2025 and 1st January 2035 will trigger the requirement to provide natural daylight by 3.0% of the total floor area being met for example, through the popholes by extending the popholes at the time that the flat deck is changed or by adding another opportunity for a light opening or finding a place to put a window/non-ranging pop hole e.g. the bird service area such as the gable end (excluding the egg/packing room).

The existing popholes would still count towards the 3.0% requirement.

As this is an existing shed the producer does not need to install windows to be compliant with the new 2025 RSPCA Standard.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 5

A producer is replacing their flat deck system with a multi-tier system **after** 1st January 2035 with no structural changes to the building. The house already has natural daylight opening corresponding to 3.0% of the total floor area of the house (as they complied with the January 2035 deadline of providing 3.0%).

Question: What changes need to be made to comply with the new standard?

Answer:

No changes needed to comply with the natural daylight requirement, as the standard – 3.0% natural daylight - has already been met by popholes.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 6

A producer is making some **structural changes** to their existing shed by adding an extension to increase their flock size after 1 October 2025. (i.e. an attached extension)

Question: What changes need to be made to comply with the new standard?

Answer:

- * **The existing shed** - will come under the 1st January 2035 standard i.e. being met for example through popholes (please see scenario 2).
- * **The extension** - this change is deemed a structural refurbishment and will trigger natural daylight by 3.0% of the floor area being met by **windows**. This is in **addition** to the natural daylight provided through the pop holes i.e. in this situation popholes cannot be used to count towards achieving the 3.0% requirement.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 7

If a site has 3 sheds and the producer is making a **structural** change to only one shed, will the other 2 sheds on site have to comply with the natural daylight requirements via the installation of windows?

Question: What changes need to be made to comply with the new standard?

Answer:

The shed undergoing the structural refurbishment will require the installation of **windows** (if this is undertaken from 1st October 2025) to meet the 3.0% natural daylight standard as popholes would not count towards the 3.0% due to the structural changes being made to the building.

If the two other sheds on site are not undergoing a structural or internal refurbishment, these sheds would be required to have natural daylight openings that correspond to at least 3.0% of the total floor area of the house through, for example, popholes by January 2035 (as per scenario 2).

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 8 - NEW BUILD

If a producer is currently building a new shed which will be completed before the 1st of October 2025 what natural light requirements are needed?

Question: What changes need to be made to comply with the new standard?

Answer:

In this example the shed will be completed prior to 1st October 2025, therefore the shed, if it does not meet the 3.0% natural daylight standard corresponding to at least 3.0% of the total floor area, will NOT have to install windows but will have to ensure 3.0% natural daylight is provided by 1 January 2035. This can be met through for example the popholes by extending the popholes or by adding another opportunity for a light opening or finding another place to put a window/non-ranging pop hole e.g. the bird service area excluding the egg/packing room.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 9 - NEW BUILD

If a producer has existing planning permission or submitted plans awaiting approval but the new shed will not be built until after 1st of October 2025 what natural daylight requirements apply?

Question: What changes need to be made to comply with the new standard?

Answer:

Producers who can evidence that planning permission has already been submitted to erect the building(s) ahead of 1st October 2025 (i.e. by 30th September 2025) would be able to apply for an exception to enable them to continue their planning applications under the 2017 standard, i.e. they would not need to add windows as part of their new build if that has not been factored into their plans.

RSPCA Assured comment "It is strongly advised to contact the RSPCA Assured for advice at the earliest opportunity to ensure compliance with this standard. This way, we can consider on a case by case basis and consider the best way forward."

It is important to note that if an exception is granted producers will still have to satisfy the requirement to meet the 3.0% natural daylight requirements by January 2035.

Therefore it is important that producers consider whether the designs can be adapted to extend popholes to meet the 3.0% requirement while they are delivering their new build or by adding another opportunity for a light opening or finding another place to put a window/none ranging pophole e.g. the bird service area excluding the egg/packing room.



SCENARIO 10 - NEW BUILD

A producer/their agent submits a planning application to the local planning authority on or after 1st October 2025 for a new free range layer shed.

Question: What does the producer need to do to comply with the new 2025 RSPCA daylight standard?

Answer:

- * Given that the planning application was submitted on or after the 1st October 2025 the 2025 natural daylight standard will apply when the shed is built i.e the natural daylight 3.0% standard needs to be met from windows alone i.e the pop holes do not count toward the 3.0%.
- * Window size and location in the shed must therefore be factored into the planning application.

Please see section on provisions during a Housing Order as this will apply.



SCENARIO 11 - NATURALLY VENTILATED SHED

I have a naturally ventilated shed with ventilation inlets that provide additional natural daylight. My pop holes provide 1.49% of the natural daylight requirement and the air inlets provide an additional 9.4% when fully open in summer and in winter the minimum aperture is 20% of maximum giving 1.87% extra daylight. Therefore the shed will always have a minimum of 3.36% natural daylight.

Question: What changes need to be made to comply with the new standard?

Answer:

The producer does not need to make any changes as they are already meeting the 2025 natural daylight standard.

Please see section on provisions during a Housing Order as this will apply.



HOUSING ORDER ISSUED BY THE GOVERNMENT

TO MEET THE RSPCA STANDARDS DURING A HOUSING ORDER:

From 1st October 2025 all free-range hens* must have access to natural daylight through the pop holes during Housing Orders.

In order to achieve this:

- * **The pop holes are fully closed for the first two weeks following the start of a Government Housing Order to manage the bird's expectation of accessing the range.**
- * **This is then followed by a gradual opening over a period of days until they are fully used to the popholes open without access to the range. More guidance on this will be available soon when RSPCA Assured have carried out some case studies.**
- * **Materials that can be used include wire mesh (maximum hole size of 25mm x 25mm) or plastic.**
- * **Producers during an audit will need to be able to demonstrate they have a plan in place for what they will do when a Housing Order is announced to meet this standard. i.e you do not have to get the materials prepared or installed ahead of a Housing Order.**

This standard applies to all new flocks placed after 1st October 2025.

- * **If layers are already in the house on 1 October 2025, producers can wait until they depopulate and place the next flock to meet this requirement.**

Based on member feedback we are currently discussing practical implementations of this standard.

HOUSING ORDER TIMELINE - LAST 11 YEARS

Given the new RSPCA standard requiring pop holes to be open, albeit covered during a Housing Order, BFREPA have compiled the chart below to illustrate the frequency and duration for which birds have been housed over the past 10 years due to the level of risk from bird flu.

Since the 16-week derogation was removed earlier this year we have seen more of a regional approach to Housing Orders.

However, during what was the second worst bird flu year in the UK, Scotland, Wales and some parts of England did not implement a Housing Order. This indicates that having a plan only for pop hole coverings – as required by the new standard - would have sufficed.

How were you affected this year?

