Results of the Member Survey on the RSPCA Assured Laying Hen Revisions

26th July 2024

This survey on the RSPCA revisions and any intended future revisions will help BFREPA shape our responses in our many meetings with the RSPCA and industry.

This survey has the proposed changes, and BFREPA anticipated concerns. It would be helpful in our negotiations if you could spend time and answer the questions on these 13 changes by selecting which answer best suits your position.

The deadline for responses was the 27th of July 2024.

British Free Range Egg Producers Association

BFREPA

The RSPCA Assured produced some key clarification points for natural daylight

The standards relating to natural daylight provision to laying hens will be included in the February 2025 publication but will have an implementation date of 1st January 2031

Natural daylight must be provided by 21 weeks of age

Natural daylight must be provided for a minimum of 8 hours per day

Natural daylight can be provided through popholes, but provisions must be made to ensure light can still enter the house if range access must be restricted e.g. in the case of a housing order.

Perspex materials could be added to the pophole openings to allow light through but prevent birds exiting the house.

Natural daylight openings must be evenly distributed, for example if your popholes count as your natural daylight openings then these need to be evenly distributed along the length of the house. Please note - this does not mean that natural daylight must penetrate all areas of the house

There are some systems where the ventilation inlets provide sufficient natural daylight provisions. If you have questions about this please get in contact with help@rspcaassured.org.uk as ventilation setups do differ and must be compliant with all of the natural daylight standards

How to calculate the % of natural daylight you already provided to your birds. **The standards require 3% of the total floor area of the house**. Please note this is the floor area where the birds are kept. This will be different for flat deck and multi-tier systems.

$$\%\ natural\ daylight\ provision = pophole\ area\ /\ total\ floor\ area$$

How to calculate for multitier:
What you need
1. Pophole area (length x height)
2. Floor area (this will be the litter area on your house information sheet)

How to calculate for flat deck:
What you need
1. Pophole area (length x height)
2. Floor area (this will be the length and width of the area your birds are kept in)

If you have questions on this or would like to discuss your system and how to meet the natural daylight standards please contact the farming engagement team at RSPCA assured.The team is here to help guide and advise members on how to meet the updated standards and is available for farm visits to help members understand what the standard is trying to achieve and give advice on what is needed for compliance. Please contact the team at help@rspcaassured.org.uk

We are preparing an online calculation tool where you can check if your house already meets the natural daylight provision with your popholes alone.

RSPCA Assured laying hen standards

Question 1 - Ref - E 6.1.1. - E6.1/6

RSPCA new standard

- Natural daylight within the main laying house must be provided by no later than 1st January 2031.
- Due to the welfare benefits natural daylight provides to birds, the RSPCA strongly encourages natural daylight to be provided in buildings as soon as is practically possible.
- Provided during natural daylight period by 21 weeks of age.
- Openings must equate to 3% of total floor area of the house.
- Where popholes are used for the provision – see follow-up question below.
- Natural light must be evenly distributed and not cause light streams.
- Must be able to control light – so that darkness can be achieved.
- E 6.1.1. a) – provision of natural daylight at all times during the natural daylight period.

Industry concern

- What are the welfare benefits?
- Cost of retrofitting.
- Suitability of older sheds to be retrofitted with windows to provide the necessary 3%.

*Industry is calling for natural daylight to be properly trialled using clear parameters to determine the pros and cons in terms of bird welfare in both white birds and brown, entire beaked flocks as well as beak tipped flocks.

- It is understood that some sheds already comply with the 3% requirement.
- The RSPCA are investigating making a calculator available for producers to work out their %

1. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

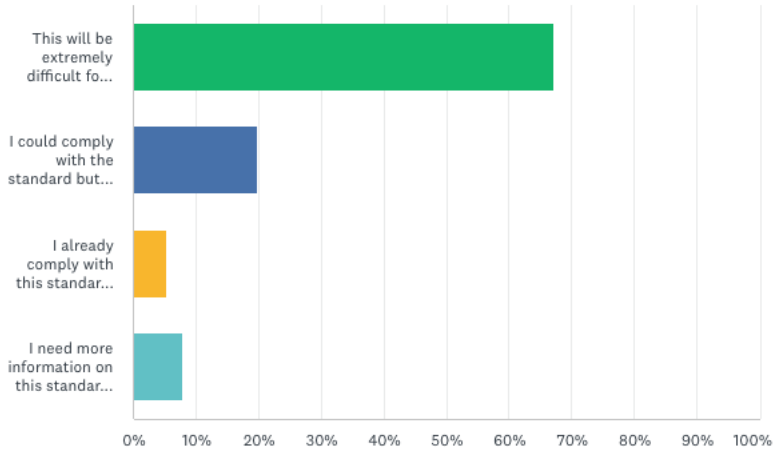
1A. In the event of a housing order, would you prefer to cover the pophole with...

A/ Transparent Material

B/ Mesh

Answer 1 - Ref - E 6.1.1. - E6.1/6

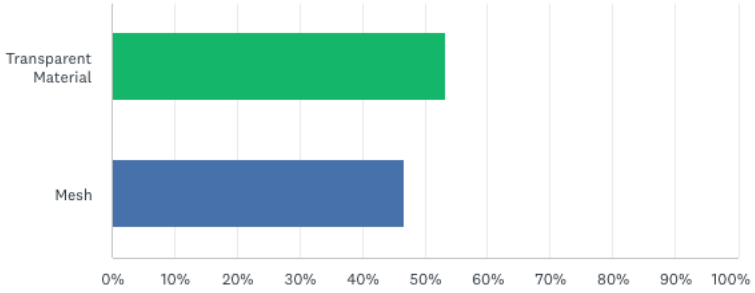
Answered: 152 Skipped: 3



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	67.11%	102
I could comply with the standard but would have to make some changes to my shed/range area	19.74%	30
I already comply with this standard/I see no issues with complying with this standard	5.26%	8
I need more information on this standard before I can comment	7.89%	12
TOTAL		152

Answer 1A - In the event of a housing order, would you prefer to cover the pophole with...

Answered: 135 Skipped: 20



ANSWER CHOICES	RESPONSES	
Transparent Material	53.33%	72
Mesh	46.67%	63
TOTAL		135

RSPCA Assured laying hen standards

Question 2 - Ref - E7.3

RSPCA new standard

- The RSPCA is currently reviewing the stocking density requirement for laying hens.

Industry concern

- Concerns around water freezing in the winter as a reduced stocking density will mean less body heat being generated creating welfare issues.
- here is the research to support a reduction in stocking?
- A reduction in bird numbers could make egg production unviable for producers and reduce availability of British egg, leading to imports from countries with lower welfare standards and lower food safety standards.

23. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

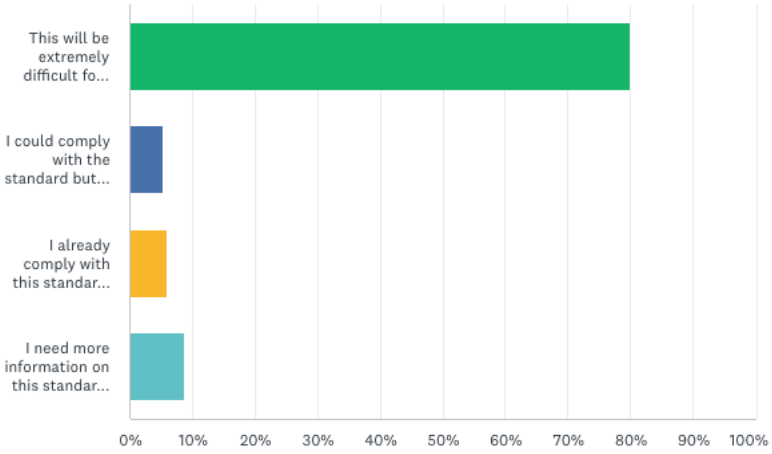
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 2 - Ref - E7.3

Answered: 150 Skipped: 5



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	80.00%	120
I could comply with the standard but would have to make some changes to my shed/range area	5.33%	8
I already comply with this standard/I see no issues with complying with this standard	6.00%	9
I need more information on this standard before I can comment	8.67%	13
TOTAL		150

RSPCA Assured laying hen standards

Question 3 - Ref - M2.5

RSPCA new standard
Contingency Planning

- The RSPCA strongly recommends that all poultry buildings are designed to deliver effective and humane whole house gas killing as a last resort, to prevent the need to use less humane culling methods.
- The RSPCA will be developing future standards in this area to ensure on-farm mass culling is effective and humane.

Industry concern

- What does this mean for naturally ventilated or mobile sheds that could never meet the specification.
- CGUs are still the preferred APHA method of disposal and the main approach taken by APHA.
- This is a matter for APHA not an assurance scheme.

3. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

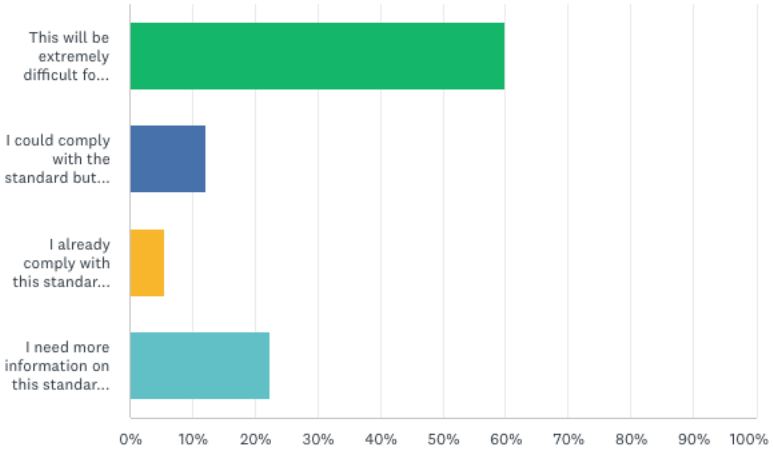
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 3 - Ref - M2.5

Answered: 147 Skipped: 8



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	59.86%	88
I could comply with the standard but would have to make some changes to my shed/range area	12.24%	18
I already comply with this standard/I see no issues with complying with this standard	5.44%	8
I need more information on this standard before I can comment	22.45%	33
TOTAL		147

RSPCA Assured laying hen standards

Question 4 - Ref - M6.1

RSPCA new standard

- A written Wild Animal Control Plan (WACP) must be: a) in place, and b) implemented on farm.

Industry concern

- There is concern that RSPCA enforcement has been extended beyond the remit of laying hen welfare. Provided farmers remain within the law and guidelines in the control of pests and other wild animals, their poultry enterprise should not be affected by principles or concerns around the welfare of other species.

4. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

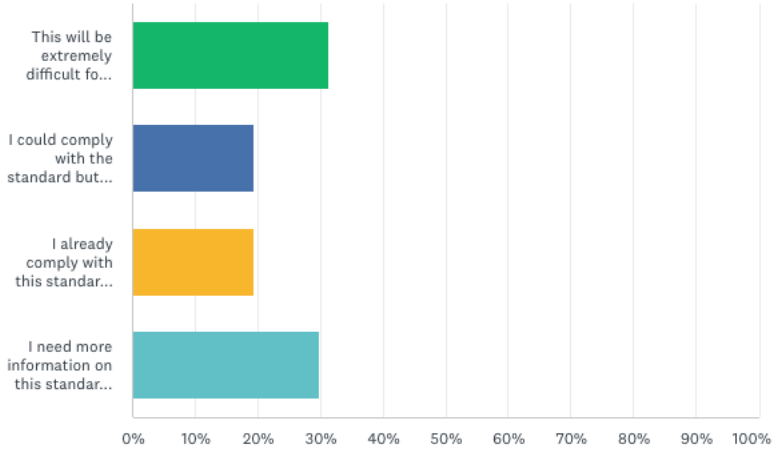
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 4 - Ref - M6.1

Answered: 144 Skipped: 11



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	31.25%	45
I could comply with the standard but would have to make some changes to my shed/range area	19.44%	28
I already comply with this standard/I see no issues with complying with this standard	19.44%	28
I need more information on this standard before I can comment	29.86%	43
TOTAL		144

RSPCA Assured laying hen standards

Question 5 - Ref - M6.19

RSPCA new standard

- Domestic animals must not have access to the unit, other than farm dogs and cats.

Industry concern

- Clarification required on definition of 'unit'. Is this the farm as a whole, the general area, the laying shed?
- Need to define "domestic animals" does this include horses or llamas used for predator control or grass management.
- In the interests of food safety and animal welfare ALL domestic animals, especially dogs and cats should be excluded from all units and hen houses.

5. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

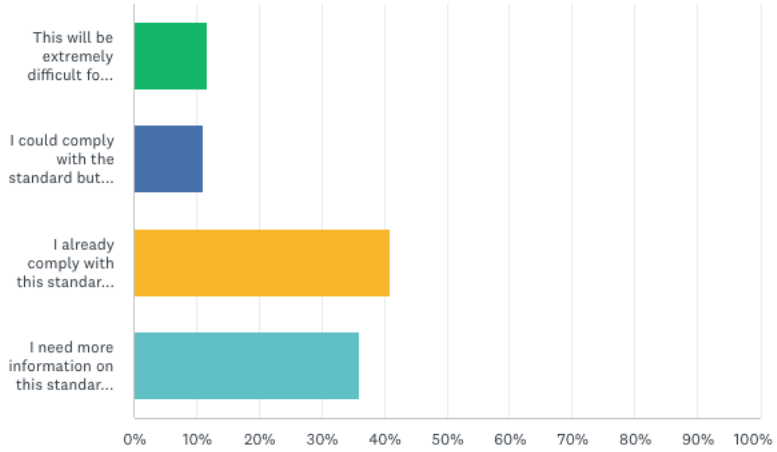
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 5 - Ref - M6.19

Answered: 144 Skipped: 11



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	11.81%	17
I could comply with the standard but would have to make some changes to my shed/range area	11.11%	16
I already comply with this standard/I see no issues with complying with this standard	40.97%	59
I need more information on this standard before I can comment	36.11%	52
TOTAL		144

RSPCA Assured laying hen standards

Question 6 - Ref - M6.7

RSPCA new standard

- Long-term baiting must not be used as a routine rodent control measure.
- The RSPCA is opposed to the use of poisons that cause animal suffering and it is important not to rely solely on the use of rodenticide. The RSPCA is concerned about the welfare of all animals that have the capacity to suffer, and therefore all alternative forms of deterrent and humane control should be exhausted before resorting to the use of poisons for rodents.

Industry concern

- Long-term baiting is allowed by the Campaign for Responsible Rodenticide Use (CRRU) in cases where that may result in risk to human and animal health and welfare". Poultry sites fit this description and many use permanent baiting with an appropriate risk assessment.
- Concerns over impact of food safety (keeping shed clear of Salmonella).

6. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 6 - Ref - M6.7

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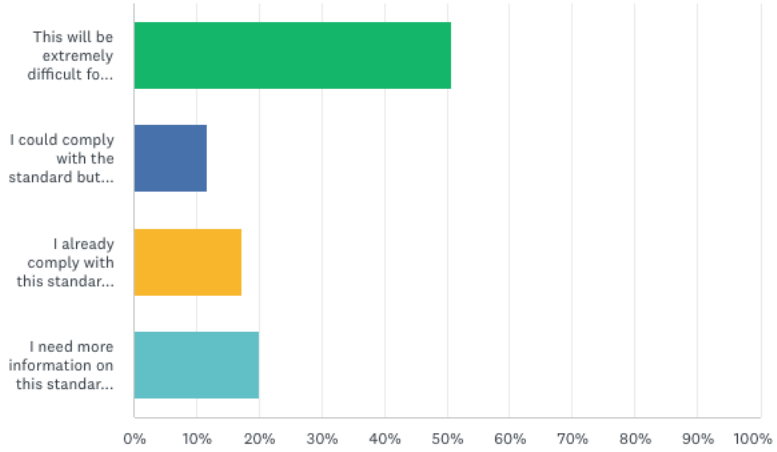


ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	50.69%	73
I could comply with the standard but would have to make some changes to my shed/range area	11.81%	17
I already comply with this standard/I see no issues with complying with this standard	17.36%	25
I need more information on this standard before I can comment	20.14%	29
TOTAL		144

RSPCA Assured laying hen standards

Question 7 - Ref - R1.11

RSPCA new standard

- All buildings that are newly approved under the farm assurance scheme applying these standards must: a) allow birds to exit the popholes directly onto the main range area b) have at least one third of the popholes with a minimum distance of 20m directly opposite to the perimeter of the range c) meet b) with respect to all sides of the shed where popholes are provided.
- Providing hens with direct access to the main range area is a key factor to encourage ranging. The RSPCA strongly recommends that all free-range systems should meet standard R 1.11.
- An impact assessment of existing scheme members range designs will be conducted to inform the next standards review.

Industry concern

- Understand the reasoning but sometimes planning constraints dictate this. May impact farms being able to put up a unit if no compromise from planners. If these are existing sites but new to RSPCA not possible to sort. Also concern for existing RSPCA that move packers these are also treated like new approvals.
- Where does the 20m figure come from, we have examples of sheds where birds access a much narrower area, travel the length of the house and reach the range at the back of the shed, birds use it very well, seen as shelter and security. Wide open spaces are not always the most attractive. In some cases this could be a deterrent to producers to join the layer industry.
- We would point out that any unit with a system that does not meet this specification may not necessarily demonstrate a restriction to range any more than a more conventional arrangement.
- The position of buildings within the confines of planning permissions or topography may mean that the building is not or cannot be situated conventionally or uniformly within the surrounding range. Does this include sites where for planning reason the buildings have been cut into hill sides and access to range is via a bank?

7. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

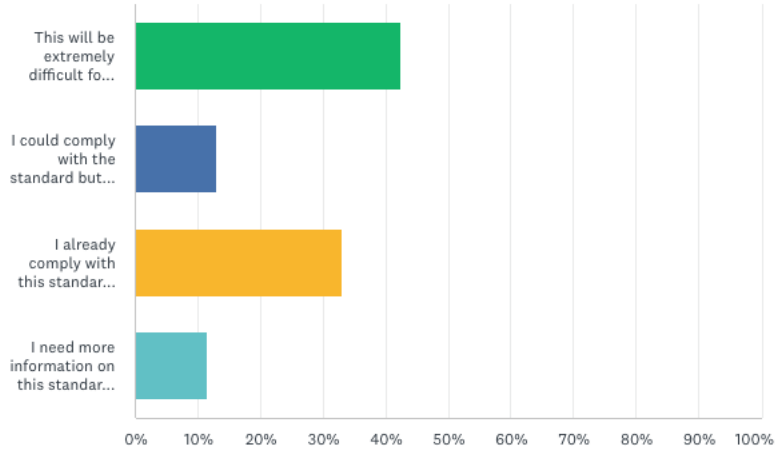
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 7 - Ref - R1.11

Answered: 139 Skipped: 16



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	42.45%	59
I could comply with the standard but would have to make some changes to my shed/range area	12.95%	18
I already comply with this standard/I see no issues with complying with this standard	33.09%	46
I need more information on this standard before I can comment	11.51%	16
TOTAL		139

RSPCA Assured laying hen standards

Question 8 - Ref - R1.12

RSPCA new standard

- Where there are fences within the allocated range area, the entire length of the fence must be a minimum height of 45cm from the ground to the bottom of the fence to enable birds to pass under the fence unobstructed.

Industry concern

- Fences within a range are there primarily for paddock rotation, if these fences have to have the bottom 45 cm lifted then the whole range area is accessible at all times. What evidence have they to say birds can't use gates in fences to access other areas. Lifting fences like this will leave co-grazing very difficult as these animals(sheep) will have access to the whole area also and will make fence management a nightmare as they will limbo under the fence and cause damage to the fence and potentially themselves.
- While the research is ongoing on this I would also suggest that some studies are carried out regarding the lifting of the bottom 45cm of fence, I would need convinced that this will encourage more ranging? Again, to postpone the date of implementation until the research shows a true benefit.
- These fences are provided to allow other livestock to co-graze the range or to allow the range to be paddocked for good sward management. In both cases it may be necessary within best farming from specific areas including standing water.

8. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

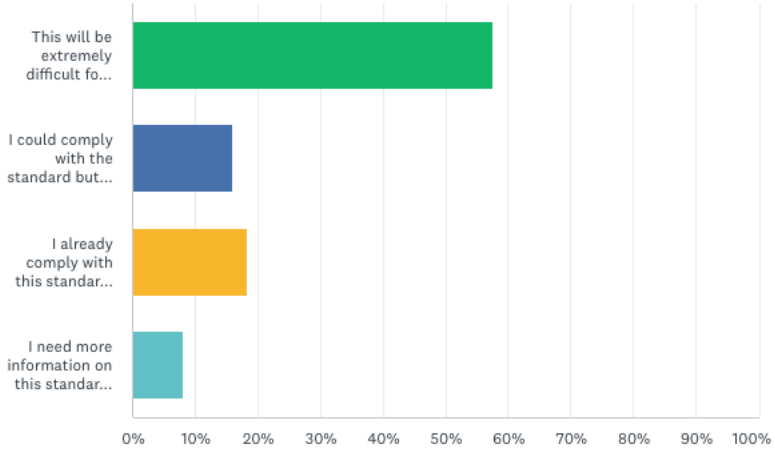
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 8 - Ref - R1.12

Answered: 137 Skipped: 18



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	57.66%	79
I could comply with the standard but would have to make some changes to my shed/range area	16.06%	22
I already comply with this standard/I see no issues with complying with this standard	18.25%	25
I need more information on this standard before I can comment	8.03%	11
TOTAL		137

RSPCA Assured laying hen standards

Question 9 - Ref - R2.1

RSPCA new standard
Shade and shelter

Shade/shelter must:

- Be provided at an area of at least 8m2 per 1,000 birds.
- Be available at all times from when the hens first have access to the range.
- Offer adequate protection from inclement weather and overhead predators.
- Be available from a distance of no more than 20m from the popholes.
- Be distributed at a minimum distribution of four shelters per hectare.
- Be of sound construction, secure and not pose any welfare risks, including injury, to the birds.

Industry concern

- Concern for a number of reasons including weather (storm), disease control and justification of numbers required.
- The amendment in this section is part e) with the requirement for 4 shelters /ha
- The standard means a typical 16,000 bird unit would require 24 shelters.
- Under the aspirational standards this can be made up of both natural and artificial but natural shelter has always been difficult to measure and enforce.
- Deciduous trees of any size or age provide different levels of shade between summer and winter.
- Shade varies enormously through the day according to the angle of the sun.
- edgerows need protection if they are to thrive bearing in mind their biodiversity contribution an allowing birds' access through them often destroys their integrity.

I
- ndustry would suggest that this is left to the discretion of the auditor as it will be very difficult to enforce. In some parts of the country artificial shelters of the type described (solid roof) would not survive local conditions.
- In the wider interest of welfare, disease control and biodiversity, reliance on natural shelter is not necessarily the best option.

9. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

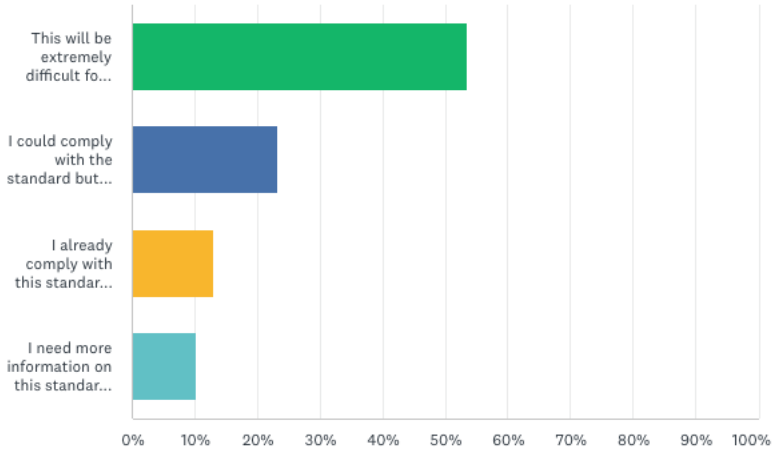
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 9 - Ref - R2.1

Answered: 138 Skipped: 17



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	53.62%	74
I could comply with the standard but would have to make some changes to my shed/range area	23.19%	32
I already comply with this standard/I see no issues with complying with this standard	13.04%	18
I need more information on this standard before I can comment	10.14%	14
TOTAL		138

RSPCA Assured laying hen standards

Question 10 - Ref - R3.5

RSPCA new standardb
For Buildings

- Currently approved by the farm assurance scheme applying these standards, where the base of the pophole is more than 40cm from the house floor (excluding the litter covering) and/or the range ground level (excluding grass height), ramps and/or platforms must be provided along the full length of the pophole for the birds to easily access the pophole.
- That are newly approved under the farm assurance scheme applying these standards, the base of the pophole must not be more than 20cm above either the house floor (excluding the litter covering) or the range ground level (excluding grass height).

Industry concern

- Industry view is that 25cms is appropriate taking into account bird access, sight and litter build up.
- What evidence is there to support this standard?
- While wishing to ensure that birds have free access and sight of the range from within, experience dictates that the maximum height should not be less that 250mm in order to contain the litter inside.
- An expense for the farmer with no evidence provided to demonstrate the benefits. Producers could argue that the higher dwarf wall protects from wet weather coming into the shed. Ramps or platforms would get caked in wet litter and muck, could potentially be a place for birds to roost or lay under and would attract red mite, all of which is detrimental to welfare.
- Question does it need to be 20cm – height only needs to be sufficient for bird to see out – so should it be 40cm as deemed acceptable for existing. 20cm quite low when you consider litter depth 10cm minimum and in places it will be higher as it will build up as birds move litter as flocks running on longer seeing litter levels in excess of 10cm. This would be hard to contain/manage with such a low wall.

10. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

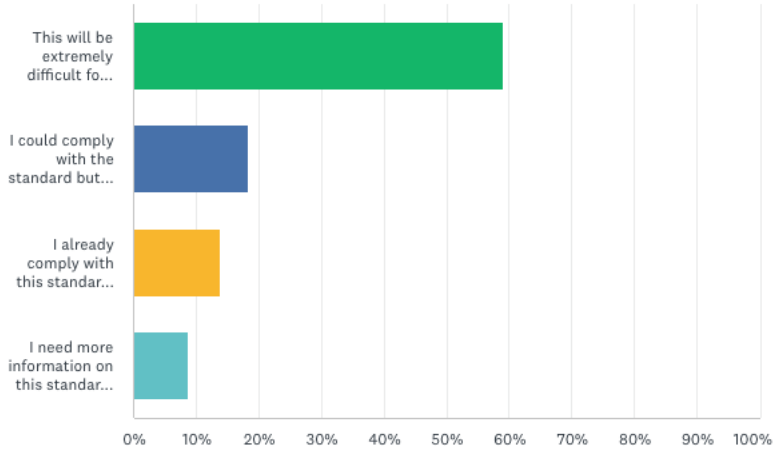
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 10 - Ref - R3.5

Answered: 137 Skipped: 18



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	59.12%	81
I could comply with the standard but would have to make some changes to my shed/range area	18.25%	25
I already comply with this standard/I see no issues with complying with this standard	13.87%	19
I need more information on this standard before I can comment	8.76%	12
TOTAL		137

RSPCA Assured laying hen standards

Question 11 - Ref - T1.20

RSPCA new standardb
Depopulation

- The RSPCA is considering alternative handling methods for end of lay hens at depopulation.
- Hens caught double legged no change – but RSPCA considering upright catching.
- We strongly encourage birds to be carried in an upright position and we are currently examining the feasibility of achieving this.

Industry concern

- Need more evidence on this for example that this causes discomfort.
- Based on a supervised trial upright catching takes too long which in turn becomes detrimental to bird welfare and is not economically viable.

11. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

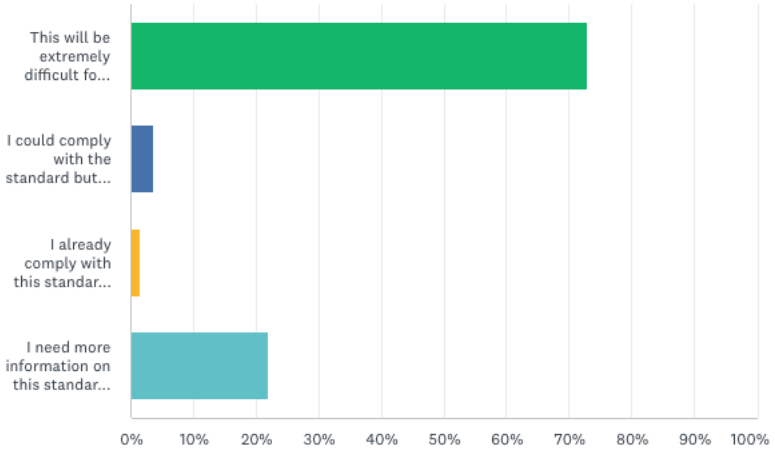
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 11 - Ref - T1.20

Answered: 137 Skipped: 18



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	72.99%	100
I could comply with the standard but would have to make some changes to my shed/range area	3.65%	5
I already comply with this standard/I see no issues with complying with this standard	1.46%	2
I need more information on this standard before I can comment	21.90%	30
TOTAL		137

RSPCA Assured laying hen standards

Question 12 - Ref - T2.7

RSPCA new standardb

- Time between loading last hen and arrival at destination no more than 8 hours.

Industry concern

- Not new – but some farms operate under derogation. No reason to limit journey time – it's the catching that has the biggest impact on welfare.

12. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

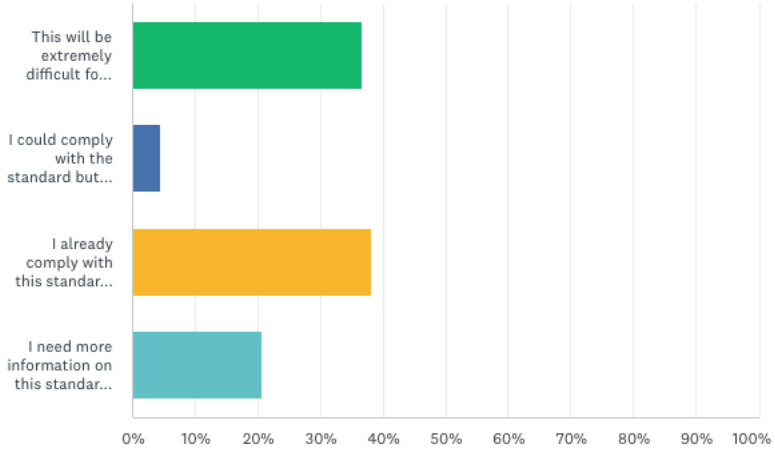
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 12 - Ref - T2.7

Answered: 136 Skipped: 19



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	36.76%	50
I could comply with the standard but would have to make some changes to my shed/range area	4.41%	6
I already comply with this standard/I see no issues with complying with this standard	38.24%	52
I need more information on this standard before I can comment	20.59%	28
TOTAL		136

RSPCA Assured laying hen standards

Question 13 - Ref - T5.1

RSPCA new standard
Natural cover must be provided:

- In the form of existing or newly planted trees/shrubs/other canopy forming plants.
- At an area equal to at least 5% of the total range area (this may include natural cover meeting the requirements of R 2.1).
- At an area equal to at least 20% of the total range area by 1 st May 2026.
- Natural cover must be at least 20% of total range area by 1st May 2026.

Industry concern
Further clarrification is required:

- What is the welfare benefit as research would indicate that there is no welfare benefit and those that have gone to this standard is for a marketing reason.
- How is this calculated and what is the specification for planting and maintenance that would provide the best solution to shelter/shade, disease and vermin control, biodiversity, practical implementation, and the long term effect before they become detrimental?
- Many landlords on tenanted properties will not allow tree planting or not to that extent.

13. What is your ability (cost and shed design/layout) to comply with this standard?

A/ This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area

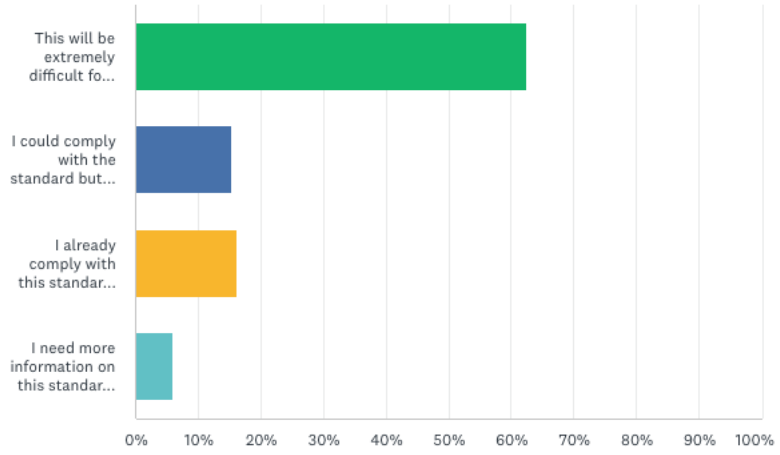
B/ I could comply with the standard but would have to make some changes to my shed/range area

C/ I already comply with this standard/I see no issues with complying with this standard

D/ I need more information on this standard before I can comment

Answer 13 - Ref - T5.1

Answered: 136 Skipped: 19



ANSWER CHOICES	RESPONSES	
This will be extremely difficult for me to comply if not impossible either due to cost, the impact on income or the layout of my shed/range area	62.50%	85
I could comply with the standard but would have to make some changes to my shed/range area	15.44%	21
I already comply with this standard/I see no issues with complying with this standard	16.18%	22
I need more information on this standard before I can comment	5.88%	8
TOTAL		136