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of Food
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Mr Vytenis Andriukaitis
Commissioner for Health and Food Safety

Date: February 3, 2017

Dear Commissioner,

Re.: Position paper on the welfare of pullets (production of eggs for human consumption)

Earlier we have brought to your attention our keen interest in improving the level of animal welfare in the European farm animal production. In this context we would like to present you our considerations regarding the welfare of pullets that will later become laying hens.

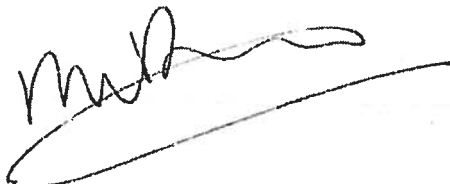
Council Directive 1999/74/EC contains minimum animal welfare standards for laying hens. However, this directive only applies from the time where the hens start laying eggs for human consumption. During rearing of pullets that later will become laying hens only the provisions of Council Directive 98/58/EC apply. These provisions are very general and do not in our view sufficiently address the complex animal welfare challenges, which may arise during the rearing of pullets. This may compromise the welfare of pullets, and have a long term effect, which will influence their functioning as laying hens.

We, the ministers responsible for animal welfare in Germany, the Netherlands, Sweden, Belgium and Denmark, therefore request you to consider drafting a proposal, which will lay down specific EU-legislation on minimum animal welfare standards for the rearing of pullets.

In order to assist you in your consideration of our request, we have taken the initiative to prepare a position paper on the welfare of pullets (production of eggs for human

consumption). It is our hope that this will lead to the inclusion of provisions on the rearing of pullets into EU-legislation on animal welfare.

Yours sincerely,



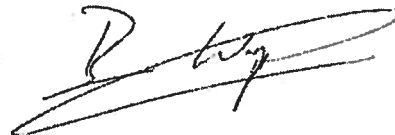
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January 2017

Position paper on the welfare of pullets (production of eggs for human consumption)

The declaration of Vught

The Vught declaration (the Joint Declaration on animal welfare of 14 December 2014) deems it necessary to consider whether specific EU-legislation should be laid down for farm animals other than those already covered by specific EU-legislation and the declaration mentions pullets among others. The declaration calls upon the European Commission to take action without delay in pursuit of the objectives outlined.

In the declaration it is also underlined that non therapeutic mutilations such as beak trimming should be phased out.

The rearing of pullets and applicable legislation

In the rearing period from one-day-old to around 20 weeks the birds, intended for production of eggs for human consumption or meant to be breeding stock, are called pullets. The scope of this position paper is the pullets that later are meant to produce eggs for human consumption. When these birds around 20 weeks have reached laying maturity and start laying eggs, they are defined as "laying hens".

Minimum EU-standards for laying hens are set out in Council Directive 1999/74/EC laying down minimum standards for the protection of laying hens. The directive applies from the time, when the hens start laying eggs, and it outlines provisions applicable for enriched cage systems and alternative (non-cage) systems.

The pullets are typically moved to the laying systems at around 18 weeks - around two weeks before they start laying eggs. During this period and during the whole rearing period from one-day-old to around 18 weeks only the provisions in Council directive 98/58/EC concerning the protection of animals kept for farming purposes apply. These provisions are very general, and do not address the complex animal welfare challenges, which may arise during the rearing period and can cause poor welfare in a sufficient way.

The need to adopt specific EU-legislation on pullets

The conditions in the rearing systems do not only affect the welfare of the pullets during rearing, they may also have a long term effect, which will influence the functioning of them as laying hens.

Examples of conditions during rearing, which are believed to have an important effect on the welfare of laying hens are access to perches and litter from early life. EFSA (2004)¹ recommends that pullets should have access to elevated perches and raised platforms of suitable material and design from an early age, so that they are better able to use them when they are subsequently housed in non-cage systems. EFSA (2015)² write that early experience in a three-dimensional space may facilitate the transition from rearing to the production environment as a result of perch usage and possibly as a result of bone strength.

The report accompanying the EFSA opinion from 2004 refers to studies, which demonstrated that in aviaries, under commercial conditions, early access to a litter substrate has a significant effect on the development of feather pecking. Adult birds that never experienced litter performed significantly more feather pecking than birds in any other treatment group.

These examples clearly show that there is a link between rearing period and the later laying period. It is therefore also appropriate that EU-legislation cover both periods. In point 1 – 9 below the recommendations and their background are given concerning the topics, which need to be included in the current EU-legislation on laying hens.

As pullets may be traded between Member States, a harmonized EU-legislation in this field would contribute to a better functioning of the internal market and a more level playing field for farmers within the Union.

In the light of this the governments of Belgium, Denmark, Germany, the Netherlands and Sweden request the European Commission to consider in the near future to supplement the EU-legislation on laying hens with provisions on pullets.

The topics addressed below focus on eliminating the welfare problems, which are known to occur in some rearing systems, or which may occur in laying hen systems due to conditions during rearing. In accordance with the principle of proportionality they are regarded as appropriate and not going beyond what is necessary to achieve the objective of improving the welfare of intensively reared pullets. However, an appropriate transitional period will need to be considered.

1. General conditions

The general conditions in point 1 – 7 of the annex of Council directive 1999/74/EC should apply to pullets.

2. Choice of rearing system

During the rearing period the pullets shall be kept in a system, which prepares them to the system, in which they will be kept as laying hens.

This is thought to minimize fear and distress when pullets are moved from the rearing system to the laying system, and also to reduce problems such as feather pecking and injuries, which may be due to problems in navigating in the laying systems.

If pullets are reared in cage systems and transferred to alternative laying systems they are likely to experience problems in navigating in a three-dimensional space. This may lead to injuries from colliding with equipment. If feeding and drinking equipment and nest boxes are located at different levels there is an increased risk not only that the birds may suffer from emaciation and dehydration but also for problems with floor eggs. The same problems may arise if pullets are reared in floor systems and transferred to multi-tier

¹ Opinion of the Panel on animal Health and Welfare on a request from the Commission related to the welfare aspects of various systems of keeping laying hens from November 2004. EFSA Journal (2005) 197, 1 – 23.

² Scientific opinion on welfare aspects of the use of perches for laying hens. EFSA Journal 2015, 13(6), 4131

systems in the laying period. When reared in a complex environment the pullets will develop better skills to navigate in a complex laying system.

Especially pullets kept in alternative housing systems during the rearing period and then transferred to cage systems in the laying period are likely to experience welfare problems such as fear and distress.

3. Feeding and drinking equipment

Feeding equipment shall allow all pullets to eat at the same time. When deciding on type of feed the effect on e.g. feather pecking in later life should be taken into consideration.

Pullets shall have access to a sufficient supply of water, and shall have access to drinking equipment that all birds are able to use, and which is adapted to the drinking equipment that the birds will have access to, when they are kept as laying hens.

Pullets seem to be more affected by social facilitation than adult hens; therefore insufficient feeder space may result in frustration, aggression and uneven growth of the flock.

There are indications that feeding pullets with pellets rather than mash may lead to poor plumage quality and a higher incidence of feather pecking. This is ascribed to the longer time birds are spending feeding when fed mash. It also seems that diet changes during rearing can be associated with an increased incidence of feather pecking in the hens. Provision of a sufficient amount of whole grain in the litter may reduce feather pecking later in life, as it increases foraging directed to the floor.

Problems may occur, when birds are changed from open drinking water (e.g. cups) to nipple drinkers. The drinking equipment, which the pullets have access to during the rearing period, should therefore be similar to that, which they are expected to have during the laying period.

4. Access to enrichment

The development of different behaviors typically takes place at an early age. Early experience with the use of different types of enrichment is therefore important. If pullets are deprived of enrichment it may have long-lasting consequences. An example of this is feather pecking, which may be the result of lack of dust bathing and foraging material at an early age.

4.1 Litter

Pullets shall have access to friable litter of good quality, such as straw, wood shavings, sand or peat from the time, when they are introduced to the rearing house. However, for pullets reared in cage systems an appropriate transitional period should be considered.

Pullets shall have access to litter during rearing in order to increase foraging behavior and to reduce feather pecking. As a precautionary principle and as absence of litter may induce development of abnormal behavior, litter should be available from day one.

4.2 Lighting regime during the first days of life

The pullets shall have a lighting regime that follows a 24-hour rhythm, which includes both appropriate periods of darkness to allow rest at proper intervals and appropriate periods of light to ensure proper development of their eyes. Preferably pullets should also have access to dark brooders (warm, dark, enclosed areas)

Access to dark brooders rather than heat lamps may reduce the prevalence of feather pecking. Both on a short and a long term effect have been shown.

4.3. Perches

Pullets shall from 7 days of life at the latest have access to perches. However, for pullets reared in cage systems an appropriate transitional period should be considered.

Pullets are highly motivated to use a perch, and if given access to perches, the pullets will start using them from a very early age – one week to 10 days old. The use of perches by laying hens, especially in alternative laying systems, seem to be impaired if they do not have access to perches from a young age. Furthermore there is evidence that birds with early experience of perch use have a higher accuracy in flights and jumps between different levels of multi-tier systems, and a lower prevalence of floor eggs and cloacal cannibalism.

The use of perches may also have negative effects due to the risk of hens colliding with them. However, this may be due to poor system design and hens not being used to perches from an early age.

5. Stocking density

When stocking density is to be decided, consideration shall be given to the pullets' demand on the whole environment, their age, live weight, health, and their needs to show certain behavior, taking into account the size of the group. The stocking density shall be such that it does not lead to behavioral or other disorders or injuries.

When pullets are reared in alternative systems, the stocking density in the last part of the rearing period shall not exceed 18 pullets/m² of useable area. When pullets are reared in cage systems, the stocking density in the last part of the rearing period shall not exceed 25 pullets/m² of cage area.

Even though current knowledge is limited, there are indications that pullets reared in alternative housing systems at low stocking densities have a reduced occurrence of feather pecking both during rearing and in the laying period.

6. Indoor climate

Pullets shall be kept in an accommodation equipped with ventilation and if necessary heating and cooling systems, in such a way that

- 1) the concentration of ammonia (NH₃) does not exceed 20 ppm, and the concentration of carbon dioxide (CO₂) does not exceed 3000 ppm measured at the level of the pullets' heads.*
- 2) the inside temperature shall be appropriate for the age of the birds.*

High concentrations of ammonia cause irritation of the eyes and respiratory system, and thus increase the susceptibility of the birds to respiratory diseases. There are furthermore indications that high concentrations of ammonia may induce severe feather damage.

The temperature inside the accommodation shall not adversely affect the welfare, including health of the pullets. The accommodation shall where necessary to avoid heat or cold stress incorporate ventilation and heating or cooling facilities.

7. Beak trimming

Beak trimming shall be banned after a transition period of maximum three years.

Beak trimming by which a part of the beak is removed is carried out within the first ten days of the chicken's life. It is carried out either as hot blade trimming or more commonly as infrared trimming. Both methods are painful, although hot blade trimming seem to be the most painful. Hot blade trimming can be performed at any age, whereas infrared trimming has to be performed immediately after hatching, and can be performed with a greater precision and consequently when performed correctly gives less abnormalities. There is acute pain associated with the trimming itself, but also chronic pain associated with the formation of neuromas, although this seem to be less evident in birds beak trimmed at a very early age.

Beak trimming is performed in order to reduce the occurrence of feather pecking and cannibalism, partly due to insufficient environmental conditions, such as stocking density and feed problems. The beak is used by pullets and hens for many activities, such as eating, preening the plumage, removing ectoparasites and exploring the environment. These activities may be compromised by beak trimming.

8. Training of staff

Staff having the daily responsibility for the pullets shall have received appropriate training.

It is important that the staff, who have the daily responsibility for the pullets, have the necessary skills in good management procedures and in understanding the animal welfare needs of the animals under their care. To this end appropriate training is important to acquire necessary skills and to obtain understanding on how to comply with relevant legislation. This is also important because young animals generally need more attention from the staff, especially when beak trimming is to be phased out. It is important to be able to understand the behavior of the birds to quickly take corrective measures that are effective.

9. Guides to good management practice

Member states shall encourage the development, dissemination and use of guides to good management practice.

These guides should provide more specific guidance on how to comply with the general provisions, including the ban on beak trimming. In particular the guides should address type of feed and litter, light and lighting regime, genetic strain and position and design of perches.

