

Scientific Advisory Committee For Animal Welfare United Egg Producers

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We write to share important information regarding the mutually responsible roles of government, academic research and the animal agriculture industry in providing a secure food system that ensures the welfare of animals through application of science-based guidelines. It is our hope that the research-based findings of independent committees of scientists will guide the establishment of animal welfare guidelines across the nation.

The egg industry was one of the first groups to establish animal welfare guidelines for commercial enterprises. In 1999, an independent committee of scientists charged by United Egg Producers (UEP) with providing science-based recommendations for the development of animal care guidelines to protect the welfare of layer hens was formed. Jeff Armstrong, then Head of the Department of Animal Sciences at Purdue University, was asked to chair and constitute the committee. Members were selected by the chair independently from UEP. The committee was able to attract nationally respected participants because it was clear that UEP was genuinely interested in developing and adopting science-based guidelines and would have no veto authority on the results.

The charge to our committee was to evaluate current understanding of contributors to laying hen welfare; this included a comprehensive review of all literature related to the welfare of laying hens. This comprehensive review was then used to create a set of science-based guidelines. In developing our recommendations, we addressed housing and space, provision of food and water, molting, air quality, beak trimming, handling and transportation, euthanasia, biosecurity and animal health. While the main focus of the committee was hen welfare, the committee recognized that consideration of ethical, environmental and economic concerns is also necessary in the development and implementation of responsible production practices.

With consummate professionalism and a commitment to science-based findings, the UEP have worked diligently to move their members to full adoption of the guidelines and make the guidelines transparent to the public by publishing them on the internet. They have also understood from the beginning that the guidelines are dynamic and are appropriately adjusted based on new research findings. For example, the UEP dropped feed withdrawal as an acceptable means to induce a molt and aligned criteria for ammonia concentrations with scientific recommendations.

The attached document includes the animal care guidelines that we developed for laying hens housed in cages, and we have strongly supported their adoption by producers. We strongly believe that these guidelines set the baseline for humane care of caged laying hens. Our committee similarly developed welfare guidelines for non-cage systems. These guidelines are also attached. We believe it is imperative that ALL HENS in non-cage or cage systems should receive housing and care that meets or exceeds the minimum science-based guidelines provided by our committee. Certainly, transparent, science-based guidelines from other reputable and independent groups are also acceptable if they meet or exceed the minimum standards identified in the UEP Guidelines.

During our earliest meeting, we spent many hours discussing the advantages and disadvantages of cage and non-cage systems. Our committee was not formed with the notion that any one system must be maintained. Our goal was to determine what was best for the well-being of hens. Our committee summarized the following as advantages and disadvantages of cage and non-cage systems:

- Advantages of cage systems
 - bird health improved – hens are separated from their feces
 - small group size – reduced incidence of pecking and cannibalism; thereby reduced requirement for beak trimming
 - good environmental control
 - no risk of predation
 - reduced risk of hen hysteria and smothering
 - improved foot health
 - increased egg production
 - improved egg cleanliness
 - easier management by personnel
- Disadvantages of cage systems
 - limit range of behaviors performed (increasing the space per hen to 67 square inches alleviated some concerns about crowding)
 - reduced bone strength
- Advantages of non-cage systems
 - more freedom of movement
 - exercise promotes better bone strength
 - enriched environment accommodates greater behavioral diversity
- Disadvantages of non-cage systems
 - higher mortality
 - increased risk of feather pecking and cannibalism
 - increased incidence of foot problems
 - increased incidence of hen hysteria and smothering
 - increased exposure to wild birds and other disease vectors in free-range systems
 - increased incidence of external and internal (e.g., roundworms, coccidia) parasites, which requires feeding of coccidiostats and /or implementation of other control methods
 - more bone breakage during lay despite stronger bones
 - higher concentrations of dust and ammonia in litter systems
 - less environmental control under free-range conditions
 - exposure to predators under free-range conditions
 - more difficult to manage
 - increased difficulty in inspecting and catching hens

Because most hens in the United States are housed in conventional cages, the committee considered space allowances in this system in great detail. There is overwhelming evidence that hen welfare in conventional cages is impaired when hens are given space allowances of less than 67 square inches/bird.

Consequently, we provided the following recommendations regarding space allocation:

- Hens should be able to stand comfortably upright in their cage.
- Space allowances should provide a minimum of 67 square inches of usable space per bird.

Based on our scientific review, we predicted that increasing the space per hen to 67 square inches would result in a drop in mortality and an increase in per-hen egg production. Information collected from egg producers has confirmed the validity of these predictions.

Enriched cages (that is, cages that include perches, nestboxes, and/or dustbaths to provide opportunities for the birds to perform a greater variety of behaviors) are a promising development. Research results and experiences with production systems in other countries indicate that such cages will likely provide the hen with additional behavioral opportunities while retaining the hen health and mortality benefits associated with cages. Because of pressure from activists, however a solid science-based assessment may be required before retailers and consumers will accept this approach.

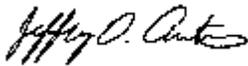
Above all, we stress the importance of using science as the basis for the development of animal care guidelines. Research evaluating a variety of systems for housing and managing laying hens shows that each housing system has welfare advantages and disadvantages, but with proper husbandry and selection of equipment, many of these systems can ensure that hens enjoy an acceptable state of welfare. It is imperative that systems be considered from a holistic perspective, and groups or individuals should avoid taking single welfare advantages / disadvantages out of context in an effort to promote a particular system.

Furthermore, it is clear that additional research is necessary to evaluate the potential short- and long-term effects of different housing systems not only on hen health and welfare, but on overall sustainability: food safety, security and quality; vulnerability to food bioterrorism, impact on human health; sustainable environmental practices; supply chain dynamics; and economic impact for consumers must all be considered.

In conclusion, our committee is unanimous in support of the implementation of science-based animal care guidelines by the industry. As stated earlier, these guidelines must be dynamic and able to be changed as we learn more about complex animal care systems. Guidelines or regulations should be structured in a way that permits innovative approaches, sets clear performance standards, and avoids setting arbitrary standards.

Sincerely,

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Please note that titles and affiliations of individuals were added for identification purposes. The views and opinions expressed in this letter are those of the members of the UEP Scientific Advisory Committee for Animal Welfare and do not represent the views or opinions of their respective organizational affiliations.