

BVA and BVPA response to Defra Consultation on a proposal to ban the keeping of laying hens, pullets and breeder layers in cages

06 March 2026

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The British Veterinary Poultry Association (BVPA) is an association of over 230 poultry veterinarians and scientists working within the poultry industry.
3. We welcomed the opportunity to contribute to Defra's consultation on a proposal to ban the keeping of laying hens, pullets and breeder layers in cages.

Animal welfare

Statement from the consultation: Our aim is to improve the welfare of laying hens, pullets and breeder layers and the policy proposal seeks to achieve this by reducing confinement of birds and ensuring that their behavioural needs are better met in non-caged systems.

8. Do you consider there to be positive welfare outcomes from banning the use of cages for laying hens (including pullets and breeder layers)? If so, what are they? Please select all that apply and leave blank if none apply.

Improved physical wellbeing

Improved expression of natural behaviours

Improved choice over movement and environment

Improved mental wellbeing

Other – please specify below

4. In our recently published [BVA Animal Welfare Strategy](#) we highlight that with developments in animal welfare science, we are now better able to characterise animal welfare, and frameworks for assessing and managing animal welfare have evolved. Historically, animal welfare assessment and management have centred on identifying and minimising negative effects on animal welfare. More recently, animal welfare assessment has shifted towards models that strive not only to minimise negative welfare but also to maximise positive welfare. Such approaches recognise that animals used by humans or under the care of humans should have, at least, 'a life worth living', with a focus on moving towards all animals having a 'good life'. Our own definition of animal welfare has evolved, from focusing on the legally required five welfare needs to recognising that to protect, advocate for and enhance animal welfare, the welfare of sentient animals should be assessed using up-to-date concepts, tools and scientific approaches. This includes awareness and assessments of behaviour as both a welfare indicator and welfare determinant, and assessment of mental wellbeing. We have turned towards the Five Domains model of welfare assessment, which differs from that of the 'Five Freedoms' and 'Five Needs' by distinguishing between the physical and functional factors that influence an animal's welfare and the overall mental/ emotional or 'affective' state of the animal arising from these factors.
5. Crucially, the model emphasises that what matters to animals in terms of welfare is their subjective

experiences, and that physiological mechanisms and affective (emotional) responses interact dynamically. One of the many strengths of the Five Domains model is the clarity it provides that merely minimising or resolving negative physical or mental states does not necessarily result in positive welfare, but may only provide, at best, a life worth living. To have a 'good life', animals need more than this; they must have the opportunity to have positive experiences, such as physical health, satiation and opportunities for positive environmental and social interactions.

6. The removal of cages allows hens to engage in more of their natural behaviours which is beneficial for welfare. Greater freedom to move benefits wellbeing as well as bone and muscle structure. Having more space both indoors (barn housing) and outdoors (free-range or organic) means laying hens are able to dust bathe. This involves hens crouching down and using their wings to throw dust through their feathers before standing and shaking it off. It helps the hens clean and maintain feathers, remove parasites and oil build up and regulate their body temperature. Similarly, a cage free system allows hens to forage, which is another natural behaviour where hens explore their surroundings pecking the ground or suitable litter substrates. The increased foraging in outdoor systems also allows the hens to have a more varied diet and increased behavioural enrichment as they are able to search for bugs and plants when outdoors.

9. Do you consider there to be negative welfare outcomes from banning the use of cages for laying hens (including pullets and breeder layers)? If so, what are they? Please select all that apply and leave blank if none apply.

Increased risk of smothering

Increased risk of injury (including injurious pecking)

Increased risk of sickness and disease

Increased risk of mortality (including predation)

Other – please specify below

7. The removal of cages, whilst offering hens more space to move around, does mean they can encounter more hens in a given space. This could increase the instances of feather pecking. Feather pecking is a complex and multifactorial problem, where birds peck at the feathers of other birds, sometimes pulling them out and eating them. The negative impacts on feather pecked birds can be significant including fatalities. The health and welfare of the affected birds is compromised, and the production, and therefore financial, losses can be great. To address this issue, hens sometimes have their beaks trimmed. This does also happen in enriched cage systems. It is widely accepted by industry and hen welfare organisations such as The British Hen Welfare Trust that beak trimming is the most cost-effective, sustainable solution to preventing injurious pecking and therefore retaining good welfare. We would like to see the industry move away from routine beak treatment but only once feather pecking behaviours can be effectively managed. We provide more detail and evidence on this issue in our joint BVA BVPA policy position on beak trimming which can be read [here](#).
8. A particular health and welfare issue that typically arises more often in non-caged systems, though not exclusively, is keel bone fractures in laying hens. The keel bone is the prominent ridge on the sternum of flighted birds to which the wing muscles attach. Selection for early sexual maturity and high egg production in commercial laying hens have led to increased bone fragility and susceptibility to fractures due to the high calcium requirement for formation of eggshells resulting in bone weakness. This weakness can predispose laying hens to increased incidences of bones breaking when they collide with housing structures and misjudge landings which are more likely to happen in open systems. This is due to hens having more space to move around and subsequently more objects to collide with. These fractures significantly impact the welfare of laying hens who show marked differences in natural behaviours such as perching, nest use, and movement, indicating reduced mobility and potentially negative affective states.
9. In alternative systems that allow birds outside to range, predation, mainly from birds of prey or

foxes, is a risk to bird welfare. It is very difficult to completely stop predation when birds are allowed access outside of the hen house. Birds housed in colony cages or in barn housing do not experience a threat or stress associated with predators. Effective biosecurity is multifactorial and access to the outdoors is one risk factor. Avian Influenza (AI) is an increasingly-present threat and current circulating strains are often spread by direct and indirect contact with wild birds and their faeces. Across 2025 this issue was demonstrated with significant ongoing AI outbreaks all over the UK leading to mandatory housing measures being introduced for a significant proportion of the year. This required all outdoor flocks to be kept indoors to reduce the risk of exposure to the disease. If the recent prevalence of AI were to become more typical then the rearing practices for free range and organic hens could change significantly as most of these birds would effectively be kept in barn housing all year round, if restrictive housing measures were to be kept in place for most of the year.

10. While we cannot conclude wholly that these proposals to ban cages would lead to an increased risk of smothering, it is more likely given the larger population groups and unrestricted floor spaces these would have access to. Smothering is the phenomenon where birds pile en masse in an area resulting in traumatic injury and suffocation of birds. Research into the causes of smothering, which is also often related to the genetic temperament of the flock, is lacking as the events occur unpredictably. They are also difficult to induce experimentally and birds behave differently in the presence of an observer. Smothering on a large scale is not typically seen in enriched cages. This is likely due to the limited number of birds within individual cages and therefore the physical piling up of a vast number of birds is less likely to occur.

10. What interventions could maximise positive welfare outcomes and mitigate negative welfare outcomes?

11. Although there are animal welfare concerns arising from cage-free systems, most, if not all, of these concerns can be reduced by the implementation of good biosecurity measures, secure housing with suitable enrichment, appropriate bird genetics, and competent, well-trained stockpersons. In free-range or organic systems, nets and good fencing can be used to limit contact with wild birds and predators and guard animals can be used to scare them away. Efforts can be taken to reduce the instances of standing water (which attracts wild birds) and reduce the exposure to wild bird faeces in the outdoor environment. The microbial content of water and foodstuffs can be screened for contamination by scanning systems and farmers can remain vigilant for signs of disease and parasitic infection before a serious infestation takes place. There is also scope for more research into ways of managing feather pecking that does not result in the need to trim the beaks of laying hens. In our [own position](#) BVA and BVPA appreciate the challenges around managing feather pecking with the sometimes necessary trimming of beaks. Although feather pecking cannot be eliminated, optimising management practices, with improved environment enrichment can reduce the frequency and likelihood of this behaviour, thereby improving welfare. There are also measures that can be implemented to reduce the incidences of keel bone fractures. These include an omega-3 and vitamin D rich diet, soft perches and optimising perch positions to reduce the force on the keel bone when hens navigate the spaces. Birds could also be selectively bred to be more resilient. To reduce the risk of smothering, the importance of well-trained stockpersons cannot be overstated. Having attentive staff can prevent smothering events from escalating if caught early. Housing can be designed to prevent areas that allow hens to build up and get stuck. Although it is a complex, multifactorial behaviour, genetics do have a part to play and in the long-term hens could be selective breed to remove the trait that increases the likelihood of smothering.

Policy proposal

Please indicate your level of agreement with the following statements:

11.a) On 1 January 2027, there should be a ban on the installation of new enriched 'colony' cages and any other caged systems used for pullets and breeder layers across the laying hen sector (laying hens, pullets and breeder layers). [Radio button to select only one answer]

Agree

Disagree, it is too early

Disagree, I don't agree with a ban

Not sure

11.b) Please explain your answer.

12. On animal welfare grounds we agree that the sooner a ban is brought into place the better. Given the shift towards cage-free production, it has been clear for some time that a ban on cages for laying hens is likely. We must stress that industry must be given time to adapt and plan so that we do not find ourselves importing shell eggs and egg products from lower welfare systems to make up any shortfall in production that results from a rushed introduction of a ban.

12.a) A 5-year transition period, beginning with a ban on the installation of new enriched 'colony' cages and any other caged systems used for pullets and breeder layers on 1 January 2027 and followed by a complete ban on enriched 'colony' cages and any other caged systems used for pullets and breeder layers on 1 January 2032, is appropriate. [Radio button to select only one answer]

Agree

Disagree, it is too long

Disagree, it is too short

Disagree, I don't agree with a ban

Not sure

12.b) Please explain your answer.

13. There is a degree of difficulty deciding on the length of time for a transition period due to several factors. With cages for laying hens the direction of travel is clear from the public and as it says within this consultation document, retail has either already phased out shell egg products from caged laying hens or they plan to. It could be that the process will be phased out by market pressures rather than government intervention so the transition period should be shorter to hasten the end of this husbandry practice. Having an unnecessarily long transition period could also disincentivise producers who were already planning to make the shift away from caged systems before a ban was announced. They may decide instead of doing it over the next couple of years with the market they will use the government date as their deadline for change instead.

14. However, there is no guarantee that the entire industry would make this shift and therefore a government ban with a considerable transition period is necessary to drive change across the sector. This must be done at a pace where industry is able to absorb costs and make the necessary changes to maintain supply so we do not end up exporting the animal welfare issue abroad. It would be incredibly counterproductive if a transition period was brought in that was too short, resulting in egg producers being unable to adjust fast enough and make up the shortfall, leading to eggs being imported from lower welfare systems.

15. It must be noted that for those shifting from enriched cages to barn housing, the building changes will be less significant and easier to do. However, those producers that choose to switch to free-range or organic will need to incorporate more space which will almost certainly require planning permission. This takes time, sometimes years, and it is not clear if UK Government would make

allowances for those wishing to shift systems by expediting planning permission for these changes to fit the 5-year transition.

13.a) A ban on conventional ‘battery’ cages on 1 January 2027 for smaller scale commercial units or hobby-keepers with fewer than 350 laying hens is appropriate. [Radio button to select only one answer]

Agree

Disagree

Not sure

13.b) Please explain your answer.

16. Barren battery cages do not meet the basic health and welfare needs of the hens kept within them. This was a significant reason in why they were banned for large scale commercial units. The issues with the cages remain the same regardless of the size of the flock and should not be used in any circumstance. Even a handful of hens kept in one of these cages are stuck in an environment that does not allow them to engage in many natural behaviours and steps must be taken to change this.

14.a) What are the barriers to moving fully to non-cage systems? Please rank the below categories, with number 1 being the most important. [Ranked question component]

- 1) Operational (for example, logistics, planning, contracts)
- 2) Financial
- 3) Technical (for example, training, consulting)

14.b) Are there any other barriers that should be considered?

17. There is a delicate balance to consider when advocating for different animal husbandry systems. A move away from cage systems will have an impact on the carbon footprint of egg laying hens and other environmental and sustainability factors. Giving hens more space to move will not only mean more space is required to house them but also that more feed will need to be provided to sustain the hens, whilst reducing stocking density will mean less output for the same amount of space.
18. Cost of living concerns in the UK coupled with an existing significant shortfall of shell egg production in the UK can drive import substitution from other countries where costs (and welfare standards) are much lower. Care must be taken to avoid anything that further impacts on UK production or the costs which would, in net terms, only reduce animal welfare in the aggregate.
19. In our position on [sustainable agriculture](#) we are clear that sustainable animal agriculture should be undertaken in a way that is environmentally, ethically and economically acceptable for consumers, producers and wider society. As part of this, animal health and welfare should not be unnecessarily compromised to address human need and in order to be considered sustainable, agricultural systems must work towards the positive health and welfare of all farmed animals raised within them.
20. Although free-range, organic or barn housing may increase costs of production and the environmental impacts of the husbandry systems, that should not be enough of a reason to prevent a change to higher welfare production methods over the longer term.

Exemptions

44.a) Should there be an exemption for the multi-tier rearing aviaries where chicks are brooded in cage systems for the first 2 weeks only? [Radio button to select only one answer]

Yes

No

Not sure

44.b) Please explain your answer.

21. In multi-tier rearing aviaries chicks under 2 weeks old have not developed enough to leave their cages, descend the levels, and return to their cage safely, leading to possible injury or even death in extreme circumstances. Keeping these systems in place only for the first 2 weeks allows the chicks to grow and develop before being allowed to explore the other tiers safely. Whilst keeping chicks in cages is not ideal, it is the most pragmatic option for these multi-tiered aviaries. If a suitable higher welfare alternative is not forthcoming then keepers must ensure these cages have suitable environmental enrichment, allowing for the maximum expression of natural behaviours in the time the chicks are kept in them.

45.a) Should there be any exemption for other purposes? [Radio button to select only one answer]

Yes

No

Not sure

45.b) Please explain your answer.

22. Cages are used for poultry in research and for breeding. Whilst we would like to see an end to the use of cages in these instances, it would need to be made clear what suitable alternatives there are open to these industries before such a ban is implemented. It is not as clear cut as moving to free-range, barn or organic systems on this sort of scale. We would encourage Government and relevant industries to find a suitable cage-free option as it raises key concerns around being satisfied that eggs are free-range, but the parent and grandparents of those free-range laying hens were kept in cages.

Trade

The UK is a world leader in animal welfare standards, and the government is proud of the high animal welfare standards that underpin our high-quality produce. The UK's reputation for high quality products drives demand for UK goods and we want to improve and build upon that record, working in partnership with farmers to support healthier, higher welfare animals.

46.a) Do you think that introducing a domestic ban on cages for laying hens, pullets and breeder layers would increase imports of shell eggs and egg products to the UK?

Yes

No

Not sure

46.b) Please explain your answer.

23. A ban is likely to increase imports, at least while caged systems are shifted to the alternatives. This may be the case if a ban is introduced too quickly out of step with industry and other key stakeholders meaning there could be a possible shortfall in domestic production as enriched cage systems are replaced. There is a significant risk that egg products and shell egg products may be imported to make up the shortfall. It must also be noted that shifts to higher welfare systems will

inevitably cost more to produce, possibly causing consumers to look for more affordable options. This is why it is very important that any transition period is clearly mapped out and financially supported by UK Government and devolved administrations where appropriate. We cannot risk exporting the welfare issue broad by importing more products that are cheaper and produced to lower welfare standards than we allow in the UK.

47.a) Do you think that introducing a domestic ban on cages for laying hens, pullets and breeder layers would increase exports of shell eggs and egg products from the UK?

Yes

No

Not sure

47.b) Please explain your answer.

24. The UK is already a net importer of eggs so any change in egg laying systems which may slow down production whilst cages are phased out will almost certainly not lead to an increase in exports of shell eggs or egg products from the UK.

Further comments

51. Please provide any comments or evidence on the environmental impacts the proposed policy may have.

25. We would like to note here that we have concerns around competing Government priorities and the need for departments to realise what they are asking for. Farmers and producers are being asked to reduce their carbon footprint and reach net zero targets, but then proposed bans such as this will likely increase the carbon footprint of egg laying facilities. This may arise due to fewer birds being kept in one space. This reduction in stocking density will be a result of the removal of cages or the need to build larger spaces to accommodate more free-range or organic systems. It is important that planning permission to shift to higher welfare systems away from cages is not held up by Government net zero targets or other bureaucratic processes. Animal welfare improvements do not need to come at the expense of environmental commitments if managed and supported effectively by Government and industry.

52. Please provide any comments or evidence on the equality impacts the proposed policy may have.

N/A

53. Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers. Please explain your answer.

26. Shifting to higher welfare systems will increase the costs of production which will likely lead to increased costs for consumers. This means increased costs of eggs and egg-products on supermarket shelves but also pharmaceuticals and vaccines which contain eggs as a component. As we are already in an ongoing cost of living crisis the impact of these increases cannot be underestimated.

54. Please provide any further considerations you feel should be noted when considering this policy proposal. Please explain your answer.

27. The British Veterinary Association is committed to advancing animal health and welfare based on veterinary expertise and scientific evidence. The use of enriched cages for laying hens in the UK presents several potential welfare challenges which should be addressed. When examining the use of cages for laying hens, pullets and breeder layers the BVA considers the overarching principle that animals used by humans should have a life worth living and preferably a good life.
28. We support the Five Domains model for welfare assessment. Production systems should offer stimulating living environments to allow for the performance of highly motivated behaviours; opportunities for positive welfare outcomes, such as comfort, pleasure, interest, and confidence; and excellent health outcomes.