

Dear Director General Dr. Eloit,

I write to you on behalf of **Igualdad Animal**, a leading animal protection organization in **Spain, and member of the Open Wing Alliance, a global coalition representing more than 70 animal protection organizations worldwide**, in relation to the laying hen welfare chapter in the February 2021 draft of the OIE's Terrestrial Code.

We are seriously concerned by the fact that this draft fails to adequately acknowledge the breadth of scientific evidence concerning the behavioural needs of laying hens, and in doing so, fails in its purpose to guide good welfare outcomes.

Specifically, the proposed chapter intentionally endorses a "range of housing systems," defying the scientific consensus that barren cage housing systems are unable to adequately provide for laying hen welfare. The text also describes providing for essential behavioural needs such as dust bathing, foraging, nesting, perching, and expression of locomotory and comfort behaviours as merely "desirable," despite the Commission acknowledging in its February 2021 report that "these behaviours are innate" and a component of good animal welfare.

Globally, there is already significant momentum to improve the welfare of laying hens.

In 2012, the European Union banned the use of conventional cage housing systems and is now mulling a proposal which would end all forms of cage confinement. New Zealand, Bhutan, Canada, and numerous U.S. states including California, Massachusetts, and Colorado have followed suit in phasing out conventional battery cages.

Food companies have also driven significant improvements to laying hen welfare through their supply chains. The world's largest food companies including Nestlé, Unilever, and Kraft-Heinz have pledged to source exclusively cage-free eggs across their global supply chains by 2025, responding to the scientific reality that cages are unable to provide for hens' welfare needs. In total, more than 1,900 food companies have committed to end their use of cage eggs, with pledges increasingly coming from companies in Latin America, Asia, and Africa.

This momentum underscores growing international recognition of laying hen welfare, and action by diverse stakeholders to move beyond barren cage housing systems.

It would appear that the OIE has chosen to compromise its science-based recommendations by committing to produce standards that are "applicable to all production systems considered in the scope of the chapter," as noted in its February 2021 report.

In failing to keep pace with global trends and prioritising industry-led appeals over the most fundamental of animal welfare needs, the OIE risks severely undermining its reputation as a source of science-based recommendations and condemning its standards to irrelevancy.

This risk is heightened by troubling allegations of corruption by member countries in the laying hen welfare chapter drafting process.

On behalf of consumers, animals, and a growing coalition of food companies and producers, we strongly urge the OIE to reconsider the February 2021 draft of the laying hen chapter with respect to the latest scientific research on behavioural needs and housing systems.

Sincerely,

**Silvia Barquero**  
**Directora Ejecutiva**