What We Heard and How We Addressed It

Amending Canada's Code of Practice for the Care and Handling of Pullets and Laying Hens

INTRODUCTION

The amendment to the P*ullets and Laying Hens* Code of Practice was initiated in December 2023 following a 5-year review that was completed in 2022. The review identified three key areas that needed updating or further clarification. A Code (Amendment) Committee (CC) was finalized in mid-2024. Unlike a Code update where the entire Code is open for revisions, a Code amendment has a limited scope of topics to be revised, and the committee must stay within this defined scope.

There were several out-of-scope comments—in particular those related to hen housing—that were not linked to any of the three amendment topics and their related Code sections. Those comments are acknowledged and will be preserved and taken into consideration when the Code is updated.

Issues identified for Amendment:

- Round feeder space for pullets and laying hens (sections 1.1.3 and 2.3)
- Minimum space allowance for pullets in multi-tier rearing systems (section 1.1.4)
- Maximum number of tiers allowed in pullet rearing and laying facilities (sections 1.1.5 and 2.6)

The 15-member committee included producers from across the country, along with representatives from the processing sector, research community, animal welfare advocacy, poultry veterinary sector, retailers, and government.

This report summarizes input received during the 60-day public comment period, which concluded on May 26, 2025, and provides insights on how it informed the final amended Code of Practice. It is intended to be read alongside the amended Code. Links to specific sections are provided throughout.

ROUND FEEDER SPACE FOR PULLETS AND LAYING HENS (SECTIONS 1.1.3 AND 2.3)

Issues identified for Amendment:

The requirement from the 2017 Code of Practice has been challenging for egg farmers that utilize round feeders, primarily because the Code requirement differs significantly from manufacturer recommendations for the maximum number of birds per pan. The round feeder space requirement was not provided as a standalone defined measurement; instead, the 2017 Code provided a formula for converting linear feeder space to round feeder space.

Producers assert that it has not been demonstrated that the 2017 Code requirements are defendable, given that feeder space provided at lower numbers does not appear to negatively impact bird welfare from a biological functioning perspective. Moreover, there does not seem to be any rationale (scientific or otherwise) for the linear-to-round feeder space conversion factor that was included in the 2017 Code, leading the industry and the Code committee to question whether this may have been included as an oversight.

Amendment Context:

Section 1.1.3: Feeders and Waterers (Pullet Housing and Rearing)

- The scope of the amendment for this section only covers pullets from 8 weeks of age until they are transitioned to the layer barn.
- The minimum required space per bird for linear feeders did not change. Only the minimum required space per bird for round feeders was amended.

Public Comment Period by the Numbers

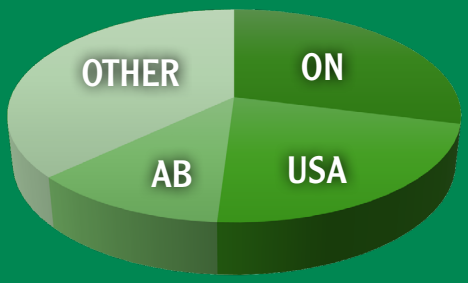
The public comment period ran from **March 27 – May 26, 2025**.

166 submissions were received.

The Code Amendment Committee had **15** members and a **3** member Scientific Panel

Photo credit: L.H. Gray & Son Limited

WHERE WE HEARD FROM



TOP THREE GEOGRAPHIC REGIONS

Ontario – 29%
USA –22%
Alberta –12%
Other –37%

WHO WE HEARD FROM

TOP FIVE*

1. Concerned citizen | advocate (97)
2. Egg consumer (24)
3. Egg producer (24)
4. Animal welfare enforcement (20)
5. Pullet grower (12)

** Note: Respondents could select multiple options*

Photo credit: EFC

A timeline of the amendment's progress can be found here!

Section 1.1.3: Feeders and Waterers (Pullet Housing and Rearing) *(continued)*

- For ease of use, a column was added to Table 1.1 to specify requirements for minimum round feeder space for all birds in the rearing phase, as opposed to only specifying linear space and a footnote with a conversion factor.
- Waterer space was not included in the scope of this amendment. For ease of use, a column was added to specify the *Minimum Water Space/Bird*, which merely adds in the converted round waterer space from the linear space, as opposed to directing readers to a footnote with a conversion factor, thereby eliminating the need for the footnote. The minimum linear water space/bird did not change (and, by extension, neither did the minimum round water space/bird).
- The only tangible change amends the minimum round feeder space requirement to 1.8 cm (0.7 in) for pullets from 8 weeks of age. All other changes are intended to simplify the format for ease of use.
- Two recommended practices were added to the pullet section to encourage producers to monitor feeding behaviour for competition or aggression and to ensure that augers are triggered manually when necessary to make sure that fresh feed is available in all pans.

Section 2.3: Feeders and Waterers (Housing Systems for Layers)

- The minimum space per bird for linear feeders did not change. Only the minimum space per bird for round feeders was amended.
- The first requirement was amended to clarify minimum feeder space for both linear feeders (7.0 cm / 2.8 in), which did not change, and round feeders (2.8 cm / 1.1 in).
- The footnote that offers guidance for converting linear space to round space is amended so that it now applies only to converting linear water trough space to round waterers.
- Waterer space was not included in the scope of this amendment and did not change.

WHAT WE HEARD:

Some of the responses suggested that the minimum round feeder space in the existing Code not be changed. While some commenters advanced the "no-change" suggestion as their preference, they also suggested that if the current Code requirements are not maintained, then the recommended practice to monitor feeding behaviour for competition and aggression should be elevated to a requirement. A second requirement for farmers to track cull data, feather condition, and production data was also suggested.

The committee agreed that the collection of production, health, and welfare data is important. Section 5.5 (Inspections) requires producers to inspect flocks twice daily and includes checking access to and availability of feed and water. This and other requirements are reflected in Egg Farmers of Canada's (EFC) Animal Care Program (ACP), which requires farmers to:

- track mortalities and culls daily;
- inspect for signs of feather pecking daily;
- track a range of daily and weekly flock information related to production and animal health (e.g., overall appearance of birds; signs of disease/ illness; availability of feed and water).

As a result, adding a separate requirement for tracking specific data was not deemed necessary, though it was suggested that such data may be utilized to help inform future revisions of the Code where there is a lack of scientific guidance. There was also a discussion about whether adding a new requirement that would have to be also added to the ACP may be out of scope for this amendment.

The suggestion to elevate the existing recommended practice to a requirement with a mandate to *monitor* and *observe* was discussed at length. Ultimately it was agreed that it would be difficult to develop audit thresholds and protocols around such a requirement. Furthermore, the Code currently mandates the inspection of flocks at a minimum of twice daily.

Other comments suggested that the recommended practice include management-based strategies as solutions for addressing competition and aggression as opposed to limiting suggested guidance to that which requires physical changes. The committee deliberated over whether producers could mitigate competition and/or aggression with management practices, or if the options should be limited to those included in the comment draft (increase feed space on a per-bird basis or remove birds). The committee agreed that there are management practices that could be used as well, and as a result, the preamble was amended in sections 1.1.3 and 2.3.

Some comments suggested that the committee review manufacturer recommendations for the maximum number of birds per feed pan. Manufacturer recommendations were considered by the committee prior to the comment period, and were a key factor that contributed to the amended requirements.

MINIMUM SPACE ALLOWANCE FOR PULLETS IN MULTI-TIER REARING SYSTEMS (SECTION 1.1.4)

Issues identified for Amendment:
Concern that the minimum space allowance required in the Code for pullets aged 8 weeks and older housed in multi-tier systems was insufficient and may lead to bird welfare challenges was raised by industry. With many pullet growers poised to rebuild or replace existing pullet housing, a need was identified to review the 2017 Code requirement prior to the planned full Code update so that rebuilding to the appropriate minimum space allowances could commence as soon as possible. Many pullet growers were stuck in a holding pattern until such time that the Code was amended to specify increased minimum space allowances.

Amendment Context:

- The scope of this amendment was limited to space allowance for pullets in multi-tier systems from the age of 8 weeks until they transition to the layer barn; this did not include an upper age limit.
- The minimum space allowance requirement for older pullets (8 weeks and older) was increased to 464.5 cm^2 (72 sq in), which includes a minimum of 283.9 cm^2 (44 sq in) for space allocated to the system and a minimum of 141.9 cm^2 (22 sq in) allocated to litter for new holdings for which the building process commences after the publication date of the amendment.
- The amended minimum space allowance represents ~36% increase in total space on a per-bird basis, and the increase in litter space amounts to nearly 2.5 times more than that required in the 2017 code.
- The Code committee recognized that pullets kept in rearing systems past 17 weeks of age are at greater risk for poor welfare due to physiological and behavioural changes associated with the onset of lay.
- As a result, a recommended practice to reinforce the importance of providing additional space for birds that remain in the pullet barn after 17 weeks of age was included in the comment period draft.

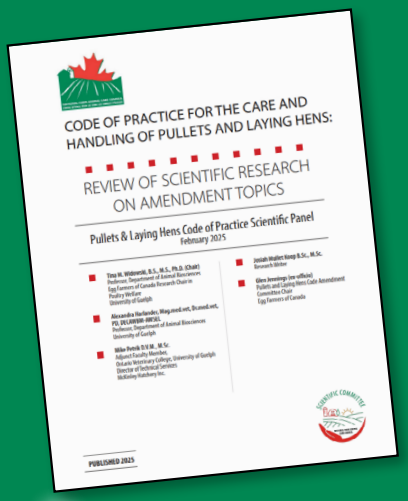
WHAT WE HEARD:

The amended preamble published for the comment period clearly signaled to industry that the recommended practice to increase the minimum space allowance for older pullets will likely be elevated to a same or similar requirement when the full Code is updated in or around 2028. Most of the comments for this amendment topic focused on the new recommended practice to provide a minimum of 541.9 cm^2 (84 sq in) for pullets kept in multi-tier rearing systems after 17 weeks of age. Many commenters pointed to the 17-week pullet age, and suggested that 17 weeks should be changed to 18 or even 19 weeks. Rationale for changing the increase in age primarily focused on production and economic arguments.

The committee agreed that this recommended practice should not be changed, pointing out that the amendment is only addressing *recommended* space allowance needs, and is not mandating or even recommending a specific age at which birds should be transitioned from the pullet barn. The next Code committee will be tasked with determining how an increase in required space allowance for older pullets in the pullet barn can be phased in.

Photo credit: EFC

The amended minimum space allowance represents ~36% increase in total space on a per-bird basis, and the increase in litter space amounts to nearly 2.5 times more than that required in the 2017 code.



Click here to view the Review of Scientific Research on Amendment Topics!

Terrace: *An additional flat plastic or wire platform in non-cage systems that may or may not be located within the main tier structure, and that birds use to move between tiers.*

Photo credit: EFC

Tier : *Any fixed floor level that is above the ground floor and is located directly above a manure belt or manure storage.*

Photo credit: EFC

There were some comments that suggested alternate wording in the preamble that describes how additional data is expected to be available to help inform future Code committee decisions, ensuring that housing conversions are managed responsibly with considerations for animal health, welfare, productivity, and the ongoing demand for eggs. That wording has been incorporated in the final amendment.

Some comments expressed concern over the perceived removal of litter space for chicks and pullets aged 8 weeks and younger. As the existing Code included all space allowance requirements in a single table, it may not have been clear that in multi-tier rearing systems chicks and young pullets are kept in an enclosed section of the system where they can receive additional care and be brooded to allow them to acclimate to their new environment. By the time pullets reach 8 weeks of age, they are released to the full system, where litter is provided. Therefore, this amendment does not impact the availability of litter for chicks and young pullets. For added clarity, the heading for table 1.3 has been changed to explain that the table covers minimum space allowances for chicks and young pullets while they are *enclosed* within multi-tier rearing systems.

There were a couple of responses that stated that they found the additional tables confusing. The committee discussed whether some tables could be combined but ultimately agreed that having multiple tables helps to distinguish between requirements by housing system type and effective date.

Some pointed out that the amended space requirement for pullets from 8 weeks to the layer barn (283.9 cm^2 (44 sq in) of *system* space + 141.9 cm^2 (22 sq in) of *litter* space) does not equal the *total* minimum space requirement of 464.5 cm^2 (72 sq in). The committee reaffirmed that this is intentional so that producers can allocate the remaining 38.7 cm^2 (6 sq in) as their systems allow.

MAXIMUM NUMBER OF TIERS ALLOWED IN PULLET REARING AND LAYING FACILITIES (SECTIONS 1.1.5 AND 2.6)

Issues identified for Amendment:
This requirement has been interpreted in different ways by equipment manufacturers for laying hen aviaries. One interpretation is that only 4 levels in an aviary are allowed, period. The other is that no more than 4 levels are allowed in one vertical plane. EFC had to develop additional criteria to interpret the requirement to ensure that the intention to protect animal welfare in multi-level systems was ensured, while allowing for innovative new aviary designs that still met this requirement to continue to be designed. While the modified interpretation has been applied to laying facilities, it is possible that it might also be applicable to rearing facilities, as the requirement is identical for both pullet rearing and laying hen housing systems.

Amendment Context:

Glossary

- The committee revised one term (*Terrace*) in the glossary and added a new term (*Tier*) to the glossary.

Section 1.1.5: Special Considerations for Multi-Tier Rearing Systems (Pullet Housing and Rearing)

Section 2.6: Special Considerations for Multi-Tier Systems (Housing Systems for Layers)

- The intent of the existing identical requirement in both sections has not changed.
- The actual maximum number of tiers was not identified for amendment; rather, the text needed to be clarified to reflect the original intent of the requirement that limits the number of tiers in both pullet and laying hen multi-tier systems.
- Both identical requirements were amended to clarify that the number of tiers must not exceed 3 in a vertical plane, where the ground level is not considered to be a tier.

WHAT WE HEARD:

Glossary:
Responses received during the comment period suggested that the proposed definitions in the glossary for both "*tier*" and "*terrace*" would benefit from further clarification. Some comments pointed out that tiers are typically non-adjustable, whereas terraces are adjustable in height and are provided to assist with movement between levels (i.e., the floor and tiers) as pullets age. In addition, comments pointed to additional confusion around the phrasing "in a vertical plane." Comments also pointed to the "significant diversity in pullet rearing system designs", adding that further guidance would be valuable to ensure consistent application across operations.

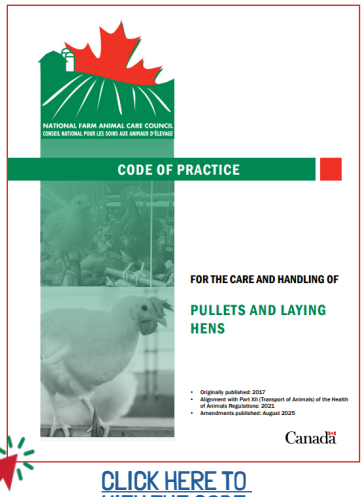
The committee agreed that both terms (*tier* and *terrace*) could benefit from further clarification, noting important distinctions for both terms (e.g., tiers are normally located above a manure management system and would typically have at least one resource [e.g., feed], whereas, terraces are typically used to assist birds with transitioning between tiers). As a result, the committee agreed that both terms could be improved by incorporating that understanding with further changes to both terms in the Glossary.

Section 1.1.5: Special Considerations for Multi-Tier Rearing Systems (Pullet Housing and Rearing)

Section 2.6: Special Considerations for Multi-Tier Systems (Housing Systems for Layers)
As noted under "Amendment Context," this topic was included as part of the amendment process as a result of the existing requirement being misinterpreted. As such, the maximum number of tiers was not under review; rather, additional clarification was deemed necessary for consistent understanding and application. Some comments were helpful in that they offered alternative wording for the two identical requirements in sections 1.1.5 and 2.6—particularly around the use of the language "in a vertical plane." The committee agreed to slightly amend the requirements for additional guidance on what is meant by "in a vertical plane," and felt that with the improvements made to the definition for *tier* in the glossary, the identical requirements in sections 1.1.5 and 2.6 have been clarified.

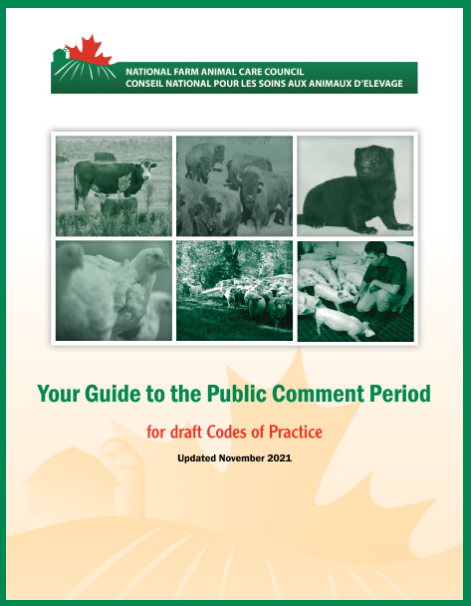
Thank you!

Thank you to all those who took the time to provide input during the public comment period. Your feedback helped to inform the decisions of the Code (Amendment) Committee to improve the final Code amendment. While not all concerns could be addressed, the committee worked hard to balance producer achievability, the available research, and stakeholder viewpoints in the amendment exercise.



CLICK HERE TO VIEW THE CODE

A common thread throughout all aspects of the Code Development Process, including the Public Comment Period, is the principle of continual improvement. Canada has set a unique path that is based on pursuing this goal through the multi-stakeholder, consensus-based approach that is led and coordinated through NFACC.



Your Guide to the Public Comment Period

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Sustainable Canadian Agricultural Partnership