

Environmental Enrichment in Farm Animals: An Update on Current Legal and Farm Assurance Standards¹

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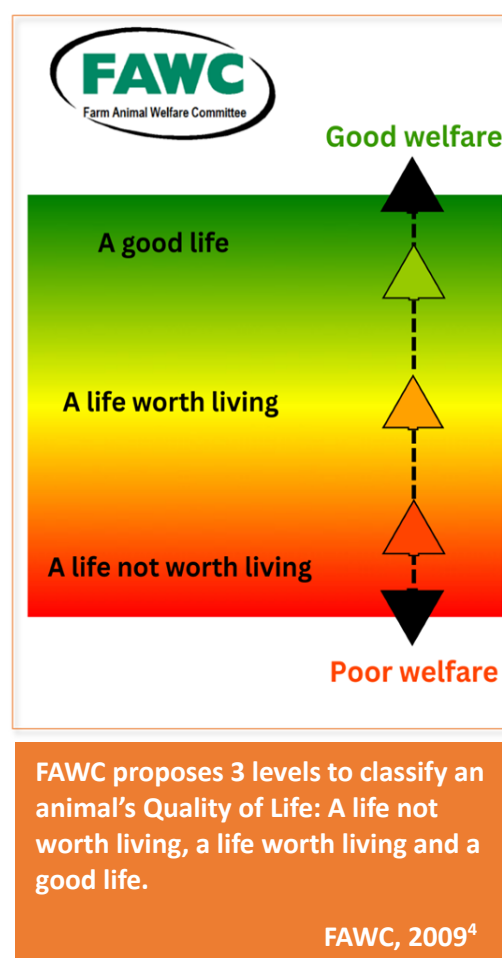
Overview

Environmental enrichment is about adding features to simple/unfurnished environments used to house intensively managed farm animals. To be effective, enrichments should have positive effects on animal welfare. This briefing provides a summary of current legal and farm assurance standards for enrichment in the UK and an analysis of these standards in terms of delivering effective enrichment.

Main Findings

The aim of this briefing is to describe the development and current status of legal and farm assurance standards relating to provision of environmental enrichment for farm animals in the UK. The briefing summarises a fuller report that combined an analysis of the scientific and grey literatures with interviews of a group of experts with direct experience of environmental enrichment in farm animals.

- Effective environmental enrichment is about adding features to simple indoor environments used for rearing farm animals that has positive effects on animal welfare.
- UK and EU legal standards for enrichment provide for minimum/baseline standards.
- UK farm assurance schemes for enrichment vary in how much they exceed the legal standards.
- Whilst environmental enrichment is a consideration in the development of UK animal production systems, many intensive systems are incompatible with effective environmental enrichment provision.
- Wider acceptance of the concept of positive animal welfare (PAW), will emphasise use of enrichment in support of animals living good lives potentially requiring more radical changes to animal production systems.



¹ This policy brief was produced as part of the Scottish Government Rural Affairs and the Environment Portfolio Strategic Research Programme 2022-2027, Theme A, Project SRUC-A3-6 Practical methods to promote and evaluate positive animal welfare (PAW). The brief is based on a full report that is available at [Environmental Enrichment for Farm Animals](#)

Introduction

Provision of enrichment for farm animals aims to facilitate performance of normal behaviour often concurrently with reducing occurrence of abnormal behaviours or injurious behaviours between animals². Enrichment for farm animals is often placed in the context of incremental improvements to existing intensive systems. In contrast, **a positive animal welfare perspective³ sees effective enrichment as leading to significant positive improvements in welfare and supports animals living good lives⁴.**

Legislative basis for environmental enrichment in UK farm animals

Historically legislation has been the most important approach to establishing minimum welfare standards for farm animals including for environmental enrichment⁵, although since the early 2000s there has been an increasing reliance on market-driven approaches (see below).

UK legal standards for enrichment are largely based on EU legislation although covered by separate legislation for the different nations⁶ (England and Wales, Scotland and Northern Ireland). For example, the Welfare of Farmed Animals (Scotland) Regulations 2010, transposes into Scottish law many of the requirements for meat chickens laid out in EU law⁷.

Legislation relating to enrichment is somewhat complicated. In part this is because of inconsistencies with some enrichments being required by law whilst others are not. Laying hens kept in enriched cages must have access to nest boxes, perches, and substrate for pecking and scratching but the legislation⁶ does not make it a specific requirement to allow for dustbathing despite the scientific evidence on hens' motivation to dust bathe⁸. There are also **inconsistencies across types of animal and species**. In comparison to laying hens there is no legal requirement for broilers to have access to perches or farrowing pigs to have the space and materials to nest-build. Some aspects which could be regarded as falling under enrichment are dealt with separately for example the space available per animal and the social environment. **Whilst legal standards for enrichment are described as laying down minimum standards, they should still lead to positive improvements to animal welfare.** There is no legal requirement to provide for behaviours such as play behaviour and exploration, which are seen as important to positive animal welfare⁹ and hence an important purpose of providing enrichment.



Hens are highly motivated to dust bathe.

www.positiveanimalwelfare.net

² Orihuela et al., 2019. Environmental enrichment to improve behaviour in farm animals. CABI Rev. 13, 1–25.

³ Lawrence et al., 2019. What Is so Positive about Positive Animal Welfare?—A Critical Review of the Literature. Animals 9, 783.

⁴ FAWC, 2009. Farm Animal Welfare in Great Britain: Past, Present and Future. Farm Animal Welfare Council, UK, London

⁵ Van de Weerd & Ison, 2019. Providing Effective Environmental Enrichment to Pigs: How Far Have We Come? Animals 9, 254.

⁶ Welfare of Farmed Animals (England) Regulations 2007; The Welfare of Farmed Animals (Scotland) Regulations 2010

⁷ Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production

⁸ Weeks & Nicol, 2006. Behavioural needs, priorities and preferences of laying hens. World's Poultry Science Journal 62, 296–307.

⁹ Lawrence, et al., 2024. Positive welfare: What does it add to the debate over pig welfare? *Advances in Pig Welfare*, pp.83-112.

The UK issues codes/guidance of practice as recommendations to animal keepers on how to comply with legislation in practice. Recommendations in the codes/guidance are not direct legal requirements but failure to comply with them can be used in court proceedings to establish liability for breaches of legislation¹⁰. **It is a legal requirement for those responsible for farm animals to be aware of and to have access to the relevant codes/guidance.** Two examples (enrichment in pigs and laying hens) are given in the full report¹¹ to illustrate how legislation on enrichment has been translated into the codes/guidance. These examples show the difficulties in translating broader ideas on enrichment contained in legislation into the more precise details for practical use.

Market-driven standards with a focus on farm assurance



Worldwide there are over 40 farm assurance schemes for broiler chicken welfare standards¹³

Since the 1980s schemes to provide farm assurance have multiplied globally; for example, over 40 schemes globally set standards relating to broiler welfare¹². **Farm assurance schemes** have several **advantages** in improving welfare standards on-farm including being **more agile to consumer demand and inspiring a general increase in standards through leadership**. Potential **disadvantages** include farm assurance **only affecting segments of the farm animal population** reared under the higher welfare standards and **dilution of national standards by importation of products** from countries with **lower standards**¹³.

The steps in farm assurance for welfare standards include:

Setting standards: The organisations (standard owners) that set UK animal welfare standards for most farm animals are Red Tractor¹⁴ and RSPCA¹⁵. Other standard owners for farm animal welfare include British Lion Code (laying hens), the Soil Association, Quality Meat Scotland and Farm Assured Welsh Livestock. Standards are set through group discussion of scientific evidence and other (e.g. practical) considerations. Standards are reviewed after a set number of years depending on the organisation.

Certification: Evaluation of standards on farms is carried out by independent organizations which are approved and accredited by United Kingdom Accreditation Service (UKAS). As examples, Red Tractor contract certification bodies (e.g. NSF) to conduct farm visits and certify farms against Red Tractor standards. RSPCA Assured assessors visit farms, hatcheries, hauliers, and abattoirs to ensure they meet the RSPCA's welfare standards. Supply Chain Insights (SCI) are the certification body for RSPCA Assured, ensuring that the scheme operates according to UKAS rules. QMS have an association with the SSPCA whereby SSPCA inspectors attend most farm visits as a part of the validation of welfare standards. Some label descriptors (e.g. Woodland Eggs; Happy Eggs) lie outside specific farm assurance schemes¹⁶.

Compassion in World Farming (CIWF) also publish 'better' and 'best' recommendations for welfare which are intended to encourage higher welfare standards with business partners and others. CIWF do not

¹⁰ <https://www.gov.uk/guidance/farm-animals-looking-after-their-welfare>

¹¹ [Environmental Enrichment for Farm Animals](#)

¹² <https://www.compassioninfoodbusiness.com/resources/broiler-chickens/how-welfare-schemes-compare-to-compassions-criteria-for-higher-welfare-broiler-chickens/>.

¹³ Christensen, 2019. How best to improve farm animal welfare? Four main approaches viewed from an economic perspective. *Anim Welfare* 28, 95–106.

¹⁴ <https://redtractorassurance.org.uk/>

¹⁵ <https://science.rspca.org.uk/sciencegroup/farmanimals/standards>

¹⁶ <https://www.ciwf.org.uk/your-food/know-your-labels/>

audit their 'better' and 'best' recommendations on-farm but intend to influence businesses to aspire to those recommendations. CIWF co-sponsor with Four Paws the Business Benchmark on Farm Animal Welfare (BBFAW) which has been assessing companies on their farm animal welfare management, policy commitment, performance and disclosure since 2012¹⁷. The BBFAW approach involves scoring companies against objective criteria based on published information only.

Farm assurance and environmental enrichment

Farm assurance schemes use legislation and the codes/guidance as the starting point for animal welfare standards including for environmental enrichment. **Scheme specific issues will determine the extent to which scheme standards exceed legal requirements for enrichment.** For example, Red Tractor standards for pigs¹⁸ align with UK legal standards, whilst their standards for broilers exceeds legal standards in relation to perches and pecking objects¹⁹. RSPCA Assured is welfare focused and is therefore more likely to exceed legal standards for enrichment. Other schemes including organic based assurance schemes and certain retailers (Waitrose; M&S) also aim to exceed legal standards for enrichment²⁰.

As with legal standards **we should expect effective enrichment to positively enhance the welfare of confined farm animals.** This depends on how the standards are set (including wording), implemented in practice and assessed.

The importance of words: Enrichment in pig production provides an example where the **wording developed in the codes/guidance** and translated into **farm assurance standards**, allows practices which can be argued to **fall short of the aim of legislation**: to enable pigs '*proper investigation and manipulation activities*'. One issue is that the codes state that enrichments '*should ideally*' be all of edible, chewable, investigable and manipulable²¹, thus allowing the interpretation that enrichments need only meet some of these characteristics. The wording in the codes also allows objects of '*marginal interest*' (e.g. a chain) in combination with '*suboptimal materials*' (e.g. wood) to be legally compliant.

From available data, combinations of sub-optimal and marginal interest materials are used as legally compliant enrichment on pig farms. The Real Welfare report (2018–2020) found that whilst 69% of pigs had access to a substrate which was usually straw, 32% of pigs on 53% of farms only had access to objects²². This data is consistent with the literature that finds continued use of 'point-source' objects including chains and wood often due to the incompatibility of substrates such as straw with slatted-floor systems⁵.



The Real Welfare report²² found that 69% of pigs had access to a substrate, but 32% of pigs only had access to objects.

Note: RSPCA Assured standards in addition to stipulating the need for enrichment materials such as long-straw to '*allow and encourage proper expression of rooting, pawing and chewing behaviours*', also require solid floors and suitable bedding for lying which can provide additional enrichment²³.

¹⁷ <https://www.bbfa.com/>

¹⁸ <https://redtractorassurance.org.uk/standard-categories/pigs/>

¹⁹ <https://redtractor.org.uk/our-standards/poultry/>

²⁰ Farm Assurance Schemes and Animal Welfare: How the standards compare 2012, CIWF

²¹ <https://www.gov.uk/government/publications/pigs-on-farm-welfare>

²² Real Welfare update report (2018–2020), AHDB

²³ <https://science.rspca.org.uk/sciencegroup/farmanimals/standards/pigs>

For laying hens in enriched cages, legislation states that birds must have access to litter for pecking and scratching⁶; the main assurance scheme for enriched cages (the Lion Code) does not add to this²⁴. In most cases the only available substrate is the food mash hens are being fed, some of which is directed to fall onto a scratch mat the size of which is unregulated; the result is that only a few birds can access this food/litter at a time with only a short window before it is pecked or disappears; this arrangement does not permit performance of fully functional dustbathing.

Assessing enrichment standards: Interpretation of **effective environmental enrichment provision** for UK farm animals is a **complex area** involving development of valid approaches to assess effectiveness of enrichments. Currently assessments of enrichments collect data on enrichment provision and, in some cases, assess the use animals make of the enrichments. The pig-based Real Welfare scheme (no longer in operation²²) was an example where provision of enrichments on farms was reported. **In terms of standard farm assurance visits, the data available on enrichment provision varies by scheme.** For the Red Tractor pig welfare assurance scheme, the detail of enrichment provision is collected by the assessor, detailed in the farm's audit report by the certification body, and provided to Red Tractor on request. RSPCA Assured assessors report back on the type of enrichment in use and this information can be used in feedback to farmers with the aim of publishing findings on laying hens and finishing pigs in the near future. Both RSPCA Assured and the Soil Association apply the AssureWel welfare outcome assessment protocol which for pigs includes assessment of the numbers of pigs using enrichment or manipulating other pigs or parts of the pen²⁵. These assessments are intended to give indication of the relative prevalence of enrichment use at scheme levels and have limitations in terms of capturing valid data on enrichment use.

Wider issues affecting levels of enrichment experienced by animals entering UK supply chains: **Infectious disease outbreaks** can have significant effects on enrichment provision for example when **straw is restricted** to pigs due to it being seen as a **potential source of infection** (e.g. African Swine Fever) or laying hens are **prevented from access to free range** as a **precaution against Avian Flu**. There is also the issue of standards for enrichment applied to imported animal products. **Importation of animal products reared under lower standards** has been **estimated to reduce animal welfare standards in the UK at point of consumption**²⁶. Currently there is no detailed analysis of this effect with respect to environmental enrichment and it is not always apparent what the standards are that apply to imported animal products. As examples, Sainsburys Annual Health and Welfare Report makes no mention of the standards that apply to their imported animal products²⁷; Waitrose do publish information on imported animal products (e.g. these show the lower enrichment standards that apply to their imported EU reared pork²⁸).

²⁴ <https://www.egginfo.co.uk/news/british-lion-launches-enhanced-code-practice-version-8-builds-25-years-eggs-you-can-trust>

²⁵ <http://www.assurewel.org/pigs.html>

²⁶ Sandøe et al. 2020. Benchmarking farm animal welfare—A novel tool for cross-country comparison applied to pig production and pork consumption. *Animals*, 10(6), p.955.

²⁷ <https://www.about.sainsburys.co.uk/sustainability/better-for-everyone/animal-welfare>

²⁸ <https://www.johnlewispartnership.co.uk/content/dam/cws/pdfs/Juniper/ethics-and-sustainability/Our-Approach-to-Animal-Welfare-and-Livestock-KPIs.pdf>

Summary of the current status of environmental enrichment for UK farm animals

There are indications that environmental enrichment for farm animals continues to have some influence on the development of animal production industries. The most recent BBFAW report finds 49% of



BBFAW reports that 49% of surveyed companies have partial or universal policies on species-specific enrichment. 46% had some level of commitment to provision of enrichment²⁹.

companies surveyed had partial or universal policies on species-specific enrichment and that 46% had some level of commitment to provision of enrichment²⁹. BBFAW find a small number of companies (3%) are leading the way with universal commitments to provide enrichment across all relevant species and geographical regions²⁹. The commitment to enrichment use is apparent in broiler production where BBFAW finds that **31% of companies** with broiler chickens in their supply chain **have set some level of target to achieve the requirements for the Better Chicken Commitment (BCC) which includes enrichment provision**²⁹. Similarly in the UK Red Tractor is setting standards for enrichment use with broilers that exceed the legal minimum¹⁹. As noted the final Real Welfare survey

found that the majority of UK pigs had some access to substrate which was usually straw²⁵. More generally **current trends in UK animal production systems appear potentially positive with respect to enrichment** including the trend towards sustainable and organic production³⁰ and a **continued consumer demand for higher welfare products**³¹.

However, as a balance to these positives **there are areas of concern**. In terms of **general trends** in animal welfare, BBFAW finds that **few companies have set targets for welfare improvements** in species other than broilers²⁹. In the UK the move away from intensive production systems that are behaviourally restrictive is only partial: a significant proportion of laying hens remain in enriched cages³²; the majority of broilers are reared in systems that do not meet the BCC requirements; whilst 40% of sows give birth (farrow) outdoors it is estimated that only 3% of their offspring will be outdoors for their entire life³³. These statistics emphasize the continued importance of environmental enrichment for farm animals housed in intensive and behaviourally restrictive systems. However, **it is in intensive systems** where the **implementation of enrichment can come into conflict with other aspects of the system** (e.g. provision of substrates such as straw to pigs on slatted floor systems; provision of litter to hens in enriched cages). The incompatibility of enrichment with intensive systems is likely an influence in the wording used in the codes of recommendations and farm assurance standards that allows use of sub-optimal enrichment materials.

Finally, it is relevant to consider the role of positive animal welfare on the future development of environmental enrichment for farm animals. Positive welfare focuses on the welfare benefits of animals having opportunities for positive experiences on a regular basis⁹. There is an increasing interest by livestock industry stakeholders in positive welfare closely related concepts such as animals living a 'good life'³⁴. **Adopting concepts** such as **positive welfare** and a **good life** should change perceptions of the

²⁹ <https://www.bbfa.com/media/2176/bbfa-2023-report-final.pdf>

³⁰ <https://www.cleartreasury.co.uk/insight/agriculture-industry-trends>

³¹ <https://researchbriefings.files.parliament.uk/documents/POST-PN-0589/POST-PN-0589.pdf>

³² <https://committees.parliament.uk/writtenevidence/119296/pdf/>

³³ <https://www.rspca.org.uk/adviceandwelfare/farm/pigs/farming>

³⁴ https://pure.sruc.ac.uk/ws/portalfiles/portal/46921180/Wemelsfelder_et_al_2022_SRUC_Research_Briefing_FINAL.pdf

purpose of enrichment towards maximising positive welfare rather than minimising harms; this change of perspective could result in very different conclusions on the level of enrichment required^{9,35}. The following quotes from FAWC on the proposition that farm animals should live a good life help to illustrate this point⁴:

'The concept of 'a good life' recognises the distinction that an animal's quality of life is over and beyond that of a life worth living.'

(Paragraph 57, page 26).

'The requirements for a good life go well beyond those for the lower level.'

(Paragraph 58, page 26).

'It is hard to conceive how certain systems of husbandry could ever satisfy the requirements of a good life because of their inherent limitations'.

(Paragraph 61, page 26).

FAWC⁴

Policy Implications

- Environmental enrichment is a key intervention to improving the welfare of intensively managed animals.
- The general incompatibility of enrichment with intensive systems is likely an influence on codes of recommendations and farm assurance standards that allows use of sub-optimal enrichments.
- Positive welfare changes perceptions of the purpose of enrichment towards maximising positive welfare; this change of perspective could result in very different conclusions on the level of enrichment required for farm animals to live good lives.

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<https://sefari.scot/research/projects/practical-on-farm-solutions-for-welfare-and-sustainability-positive-welfare>

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³⁵ <https://www.positiveanimalwelfare.net/wp-content/uploads/2023/11/Jessiman-et-al.-iPAW-stakeholder-report.pdf>