To: **The African Organisation for Standardisation (ARSO)**

And To: **The Standards Authority of 44 ARSO Member Countries**: including Algeria, Benin, Botswana, Burkina Faso, Burundi, Cameroon, Chad, Côte d'Ivoire, Democratic Republic of Congo, Djibouti, Egypt, Eswatini, Ethiopia, Gabon, Ghana, Guinea, Guinea-Bissau, Kenya, Lesotho, Liberia, Libya, Madagascar, Malawi, Mauritius, Morocco, Namibia, Niger, Nigeria, Republic of Congo, Rwanda, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, South Sudan, Sudan, Tanzania, The Gambia, Togo, Tunisia, Uganda, Zambia, and Zimbabwe

Date: **21 January 2026 [Updated as at 27 January 2026]**[1]

LETTER TO THE AFRICAN ORGANISATION FOR STANDARDISATION (AND AFRICAN COUNTRY STANDARDS AUTHORITIES) REGARDING DRAFT 'LAYING BATTERY CAGES FOR CHICKEN - SPECIFICATION' STANDARDS

We, the undersigned 35 (thirty-five) civil society and non-profit organisations, work across Africa, including in many African Organisation for Standardisation ("**ARSO**") member countries, to advance animal welfare and protection, environmental justice, human rights, and consumer rights respectively.

We write this letter in the first instance to the ARSO (and in the second, the individual standards authorities of its country members) to express our concerns regarding the ARSO's CD-ARS 1241:2025(E): Draft Laying Battery Cages for Chicken - Specification Standards ("**Draft Battery Cage Standards**"), recently released for comment.

Our concerns arise from the Draft Battery Cage Standards' endorsement and normalisation of battery cage systems for egg-laying hens - which are widely recognised as incompatible with animal welfare, increasingly being rejected by consumers and markets, including in Africa, and out of step with global trade and corporate developments.

The Draft Battery Cage Standards also directly conflict in their assessment of the welfare needs of egg-laying hens with ARSO's own CD-ARS 1851(E): Draft Animal Husbandry Guidelines for Egg-Laying Flocks – Cage-Free ("**Draft Cage-Free Standards**"), which were prepared by the same Technical Committee (TC 23: Live Animals) and released to ARSO members concurrently with the Draft Battery Cage Standards.

One of ARSO's fundamental mandates is to enhance Africa's "*internal trading capacity, increase Africa's product and service competitiveness globally and uplift the welfare of African communities*". We submit that the Draft Battery Cage Standards undermine each of these objectives and mandates. By stating that battery cages are "essential" and promoting them, ARSO risks entrenching outdated and colonial systems that cause severe animal suffering, expose African producers to economic risk, and conflict with African ethical values rooted in dignity, compassion, and interconnectedness (including those articulated through philosophies such as *Ubuntu*).

While we recognise that the Draft Cage-Free Standards may themselves benefit from amendments and further strengthening, this letter focuses specifically on the Draft Battery Cage Standards.[2]

[1] This Letter was delivered to the recipients by email on 21 January 2026 with 29 original signatories. This version (V2) has been updated as at 27 January 2026 to reflect 6 (six) additional signatories and their countries, with no additional changes.
[2] Please note that this Letter is non-exhaustive of issues and concerns with the Draft Battery Cage Standards; Draft Cage-Free Standards; and any other standards and documentation of ARSO.

OUR CONCERNS

There are several issues arising from the Draft Battery Cage Standards, which are expanded on further in **Appendix 1 to this Letter** and include:

1. fundamental welfare concerns with battery cage confinement of layer hens. The draft standards state that the cage system "*guarantees the welfare of birds*". However, hens have strong instincts to lay their eggs in a nest, peck and scratch at the ground, perch and dust-bathe (among others). None of these behaviours are possible in battery cages;
2. inadequacy and inconsistency of "*welfare measures*" in the draft standards;
3. consumer expectations and growing demand for higher-welfare food products;
4. economic risks and stranded asset concerns;
5. growing global shift towards cage-free egg production systems and the second-hand battery cage dilemma;
6. corporate transitions and commitments to cage-free egg sourcing in much of the world including Africa; and
7. procedural concerns.

OUR REQUESTS

We respectfully urge ARSO to withdraw or fundamentally revise the Draft Battery Cage Standards to ensure alignment with scientific evidence, evolving consumer expectations and demands, global trade trends, corporate commitments and ARSO's own mandate and Draft Cage-Free Standards. This would recognise that the continued endorsement of battery cages is incompatible with African ethical values and philosophies rooted in dignity, compassion, and interconnectedness.

As part of any revision or re-evaluation, we request that ARSO implement the Stage 4 public review process across all member countries and ensure that all comments from NSBs and stakeholders are properly considered before the draft progresses to balloting or adoption. Individual standards authorities of ARSO country members must also ensure compliance with all relevant processes, including in terms of public consultation and participation.

ARSO (as well as the individual standards authorities of its country members) have an opportunity to demonstrate leadership by advancing higher-welfare, more sustainable and future-oriented egg production systems that support African farmers, protect African animals, and respond to African consumer and market realities. This requires abandoning the false and harmful assertion that battery cages "*guarantee welfare*" and recognising them instead as among the most restrictive, inhumane and unsustainable farming systems in existence.

We therefore call on ARSO (and to the extent relevant and appropriate, the individual standards authorities of its country members) to:

1. reject the promotion of battery cages as an African standard and remove the claim that the battery cage system "guarantees the welfare of birds", a statement that contradicts decades of scientific evidence;
2. remove the characterization of battery cages as "essential in poultry production: a claim that ignores the successful operation of cage-free systems across Africa and globally;
3. prioritise and promote cage-free and higher-welfare egg production systems;
4. require labelling of eggs stating that they are from caged systems ("caged eggs");
5. take active steps to safeguard Africa from becoming a dumping ground for obsolete and cruel farming equipment;
6. explore standards that ensure competitiveness through higher welfare systems; and
7. ensure that African standards uplift, rather than undermine, the welfare, protection and interests of African animals, consumers, and communities.

THE UNDERSIGNED

Supported by 35 African Organisations either operating across Africa and/or in the following specific countries: Angola, Botswana, Burkina Faso, Cameroon, Egypt, Ethiopia, Ghana, Kenya, Liberia, Malawi, Morocco, Namibia, Nigeria, Rwanda, Senegal, Sierra Leone, Somalia, South Africa, Tanzania, Uganda, Zambia, and Zimbabwe

APPENDIX 1:

DETAILED ISSUES WITH DRAFT ARSO BATTERY CAGE STANDARDS

1. FUNDAMENTAL WELFARE CONCERNS WITH BATTERY CAGE CONFINEMENT OF LAYER HENS

The Draft Battery Cage Standards assert that "*the laying hen cage system has become the most important facility as it* ***guarantees the welfare of birds*** *while laying*" (emphasis added). This claim is not supported by contemporary scientific evidence and contradicts decades of animal welfare research.

A substantial (and growing) body of scientific evidence demonstrates that battery cages are inherently harmful to egg-laying hens.[3] Chickens are sentient beings with complex cognitive, emotional, and social capacities, including but not limited to learning and memory, spatial awareness, anticipation of future events, emotional experience, social bonding, communication, empathy, and individual personality traits.[4] These capacities impose a clear ethical obligation to ensure that production systems allow hens to meet their most basic behavioural and physiological needs.

Battery cages fundamentally fail this standard and reduce layer hens to mere commodities. Scientific research has established that hens have powerful instincts to lay their eggs in a nest, peck and scratch in the ground (foraging), perch and dust-bathe.[5] None of these highly motivated natural behaviours are possible in a battery cage. Thousands of years of domestication have not fundamentally altered these behaviours. In addition, the space provided by battery cages is so limited that hens cannot even stretch or flap their wings.[6] Lifelong confinement in barren cages results in well-documented physical harms, including osteoporosis (due to the severe restriction of movement in cages), bone fractures, foot lesions, and muscle atrophy, as well as chronic stress, frustration, and abnormal behaviours.[7]

By contrast, ARSO's Draft Cage-Free Standards explicitly acknowledge *"the need to consider adopting cage-free systems for improved animal welfare"* and aim to *"address both physiological and behavioural needs that minimize stress and promote the health and welfare of the laying poultry"*. ARSO's Draft Cage-Free Standards recognise the fundamental importance for hen welfare of providing perches, nests and litter but, despite this, ARSO asserts that battery cages - where none of these materials can be provided - guarantee the welfare of hens. ARSO's Draft Cage-Free Standards emphasise the importance of understanding poultry behaviour in order to identify distress, injury, and disease and to take appropriate action. The Draft Battery Cage Standards disregard these same principles, despite having been developed by the same Technical Committee and released simultaneously.

This internal contradiction cannot be overstated and should not be overlooked. ARSO cannot credibly affirm the ability for hens to be able to perform highly motivated behaviours as essential to animal welfare in one standard, while simultaneously endorsing, and

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[3] See for example: Shields, S., & Duncan, I. J. (2009). A comparison of the welfare of hens in battery cages and alternative system, accessible at: https://www.wellbeingintlstudiesrepository.org/hsus_reps_impacts_on_animals/18; and RSPCA: https://www.rspca.org.uk/documents/1494935/9042554/Thecaseagainstcages+%28513kb%29.pdf.

[4] Marino, L. Thinking chickens: a review of cognition, emotion, and behavior in the domestic chicken. Anim Cogn 20, 127–147 (2017) accessible at: https://doi.org/10.1007/s10071-016-1064-4. Also see Animal Law Reform South Africa reports on the egg industry of South Africa: *Laying Down the Facts* and *Scrambling for the Truth*:, accessible at: www.eggssouthafrica.org or www.animallawreform.org.

[5] European Food Safety Authority (EFSA). (2005). Opinion of the Scientific Panel on Animal Health and Welfare (AHAW) on a request from the Commission related to the welfare aspects of various systems of keeping laying hens. EFSA Journal, 3(3), 197, accessible at: https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/j.efsa.2005.197.

[6] Dawkins, M. S., & Hardie, S. (1989). Space needs of laying hens. British Poultry Science, 30(2), 413-416, accessible at: https://www.tandfonline.com/doi/pdf/10.1080/00071668908417163.

[7] The Humane League: https://thehumaneleague.org/article/battery-cages and Baxter, M. R. (1994). The welfare problems of laying hens in battery cages. *The Veterinary Record*, *134*(24), 614-619, accessible at: https://europepmc.org/article/med/7941260.

characterising as *welfare-guaranteeing*, a production system in another standard that inherently and systematically prevents the performance of these behaviours.

2. INADEQUACY AND INCONSISTENCY OF "WELFARE MEASURES" IN THE DRAFT BATTERY CAGE STANDARDS

The Draft Battery Cage Standards attempt to mitigate welfare concerns through technical specifications, including requirements for "*friendly environmental design*", an allocation of "*450 cm^2 of available area per hen*", and prescribed gradients and gauge thickness for the wire flooring. These measures are manifestly inadequate. An allocation of 450 cm^2 per hen, less than the area of an A4 sheet of paper, cannot reasonably be described as guaranteeing comfort nor meaningful movement, nor does it allow for even the most basic natural behaviours. No degree of engineering refinement can overcome the inherent welfare limitations of such extreme confinement.

3. CONSUMER EXPECTATIONS AND GROWING DEMAND FOR HIGHER-WELFARE FOOD PRODUCTS

ARSO's Draft Cage-Free Standards acknowledge that *"there has been growing demand for cage-free eggs in many regions of the world. This is because many consumers across the world increasingly care about animal welfare and expect improved treatment and conditions of farm animals. Hence the need to consider adopting cage-free systems for improved animal welfare, increased market access and increased product quality"*. Having highlighted growing consumer demand for cage-free eggs and the market-access benefits for farmers in producing such eggs, it is surprising that ARSO should characterise cage systems as *"the most important facility"*.

Consumer demand for higher-welfare products is not limited to the Global North. Across Africa[8] and globally,[9] consumers increasingly consider animal welfare to be *very* or *extremely* important when purchasing animal products. A recent multi-nation survey indicated significant consumer demand for animal welfare-certified products, with particularly high concern for animal wellness recorded in South Africa (84%),[10] an ARSO member country. Furthermore, consumers may be unaware that their eggs come from caged systems.[11] Accordingly, ARSO should promote transparency by requiring the systems of production to be identified on packaging and labelling of eggs – thereby allowing consumers to make informed choices.

By endorsing battery cage systems and regarding them as "***essential** in poultry production to ensure their profitability*" (emphasis added) – a statement which we reject, the Draft Battery Cage Standards fail to account for this shift in consumer expectations and demand.

We acknowledge that cage-free systems require supportive infrastructure, training, and market development to be successfully implemented at scale. For these reasons, ARSO should invest in standards that build toward viable higher-welfare alternatives rather than entrench outdated (and colonial) systems.

[8] National Science Foundation ("NSF"): https://www.nsf.org/za/en/news and EA Forum referencing Ghanian Study "Assessing the Attitude of Ghanaians Towards Farmed Chicken Welfare, Higher Welfare Egg-Labeling, and Willingness to Pay:": https://forum.effectivealtruism.org/posts/kkKu6G7Ys8bZZjoJu/awl-2024-review-and-2025-plans-1.
[9] Faunalytics: https://www.frontiersin.org/journals/animal-science/articles/10.3389/fanim.2022.995430/pdf.
[10] NSF: https://www.nsf.org/knowledge-library/how-consumers-feel-about-animal-wellness.
[11] Animal Law Reform South Africa, Scrambling for the Truth: Corporate Hypocrisy and Non-Transparency Relating to Environmental and Consumer Rights in the Egg Industry in South Africa (September 2024), accessible at https://www.eggssouthafrica.org/wp-content/uploads/2025/02/Scrambling-for-the-Truth-V2.pdf.

Across Africa, farmers are increasingly recognising the limitations of battery cage systems, and there is growing interest among African stakeholders in higher-welfare production methods, including from Ghana, Tanzania, Zimbabwe, and Uganda (among others).[12]

Moreover, cage-free producer networks across Africa are expanding. In Ghana, for instance, a national cage-free producer network grew by 40% in 2024, bringing in major agribusinesses, including a company which previously reported distributing up to 15 million eggs per month.[13]

4. GROWING GLOBAL SHIFT TOWARDS CAGE-FREE EGG PRODUCTION SYSTEMS AND THE SECOND-HAND CAGE DILEMMA

Battery cages are being banned or phased out across many jurisdictions in the world in recognition of their severe and inherent welfare harms and limitations. Countries and regions with full or partial bans, or formal phase-out measures, include India, New Zealand, Australia, Switzerland, the United Kingdom, Canada, Mexico, Israel, Bhutan, the European Union ("EU") (27 countries), as well as multiple states within the United States of America.[14] Additional countries are actively progressing toward similar reforms.

At the same time, Africa has become a destination for decommissioned or surplus battery cage equipment from countries and regions where such systems are no longer permitted. This phenomenon, described by African animal welfare organisations as the "***Second-Hand Battery Cage Dilemma***",[15] represents a form of technological dumping that entrenches outdated, harmful systems on the continent.[16]

A 2023 peer-reviewed study[17] documented a 43% increase in exports of battery cage equipment from the EU to non-EU destinations (including Africa and Asia) following the EU battery cage ban. In many African contexts, particularly where egg production has traditionally been small-scale or cage-free (by default) due to informal markets being the dominant market, this trend risks actively driving a transition *towards* intensive caged systems rather than away from them. Continued promotion of battery cages in Africa therefore risks embedding a colonial pattern whereby practices deemed unacceptable (and unprofitable) in countries (largely in the Global North) are exported, normalised, and institutionalised in African markets - regardless of the harms they cause, creating risks of technological lock-in and economic dependency.

This trajectory is incompatible with ARSO's mandates to enhance Africa's global competitiveness and future prospects in international trade and to "*uplift the welfare of African communities*". As more countries restrict imports of cage-produced eggs and egg products, African producers relying on battery cages will face increasing barriers to export and participation in global value chains.

[12] Twenty delegates from Ghana, Tanzania, Zimbabwe, and Uganda participated in the International Training on Cage-Free Innovation and Welfare Hub at Indonesia's Universitas Gadjah Mada in November 2024 representing the growing interest among African stakeholders in higher-welfare production methods. See Universitas Gadjah Mada: https://ugm.ac.id/en/news/20-african-delegates-participate-in-cage-free-egg-farming-training/.
[13] Animal Welfare League: https://www.animalwelfareleague.org/producers.
[14] The Humane League: thehumaneleague.org/article/battery-cages; The Guardian: https://www.theguardian.com/world/2022; Sky News: https://www.skynews.com.au/australia-news/animal-welfare-group; The Poultry Site: https://www.thepoultrysite.com/news/2012/02/uk; Mercy for Animals: https://mercyforanimals.org/blog/canadian-egg-industry/; The Poultry Site: https://www.thepoultrysite.com/news/2012/08/bhutan-; and Compassion in World Farming: https://www.ciwf.com/food-business/eggtrack/.
[15] Faunalytics: https://faunalytics.org/africas-second-hand-battery-cage-dilemma/.
[16] Ibid.
[17] Ibid and Ferguson, S. M. (2023). Unconstrained trade: The impact of EU cage bans on exports of poultry-keeping equipment. *Journal of Agricultural Economics*, *74*(2), 435-449, accessible at: https://doi.org/10.1111/1477-9552.12513.

5. ECONOMIC RISKS AND STRANDED ASSET CONCERNS

Continued investment in caged egg production risks creating **stranded assets** - infrastructure and investments that lose value prematurely as consumers, markets, retailers, and regulators increasingly move away from cage-produced eggs. Such investment further exposes African producers to significant economic risks.

Research from Ghana, for example, demonstrates that cage-free systems can be economically viable in African contexts, particularly when factoring in lower infrastructure costs, reduced disease transmission risks, and growing consumer demand for higher-welfare products.[18]

Though not African-specific, but relevant nonetheless, a 2025 systematic review[19] examining economic impacts of cage-free policies in Asia concluded that "*the economic viability of egg production in the region is likely to be driven by feed prices and associated government policies, rather than production system per se*", finding that cage-free farming costs increased by 11-17% while revenues increased by 13-15%, a modest net difference that is often offset by premium pricing.

Feed costs, not housing systems, represent the dominant cost component for African egg producers, accounting for approximately 75% of total production costs (or more, or less, depending on the country).[20] It can be argued that price volatility in maize and soya beans in recent years[21] far exceeds the marginal cost differences between cage and cage-free systems.

6. CORPORATE TRANSITIONS AND COMMITMENTS TO CAGE-FREE EGG SOURCING

Globally and in Africa, many retailers, food service operators and food manufacturers are transitioning to cage-free egg usage and/or have publicly committed to ending the sale and use of such eggs.[22] Global companies operating in Africa such as Unilever, Nestlé, McDonald's, Burger King, SPAR, Starbucks, KFC, Sodexo, Marriott International and numerous others have made public commitments to transition to or implement cage-free egg sourcing practices.

According to data from The Humane League, 92% of companies with cage-free commitments and deadlines of 2024 or earlier have successfully transitioned globally.[23] In Africa, as of July 2025, approximately 88% of cage-free commitments with deadlines of 2024 or earlier have been fulfilled.[24] This includes major African corporations such as Famous Brands, Abusol Limited, Woolworths and SPAR, alongside a growing number of regional and local businesses. Furthermore, in 2025 alone, African members of the Open Wing Alliance Africa secured **over 60 cage-free commitments from corporations operating in Africa**.

These developments demonstrate that cage-free systems are not only viable in Africa, but increasingly preferred. The Draft Battery Cage Standards risk undermining this progress by

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[18] Animal Welfare League Economic Analysis of Poultry Production Systems: Cage-free vs Battery Cages (November 2024): https://www.animalwelfareleague.org/economic-analysis.

[19] Ryba, R. (2025). Evaluating the Economic Impacts of a Cage-Free Animal Welfare Policy in Southeast Asian and Indian Egg Production: A Systematic Review. *Evaluation Review*, *49*(3), 564-593, accessible at: https://journals.sagepub.com/doi/full/10.1177/0193841X241280681.

[20] See Moreki, J. C., Bhawa, S., Moreki, M. I., & Adesehinwa, A. O. (2025). Poultry Production in Africa: Present Status, Challenges, Opportunities, and Prospects. Egyptian Journal of Veterinary Sciences, 1-15, accessible at: https://www.researchgate.net/publication/393211098_Poultry_Production_in_Africa_ and Farrelly Mitchell: https://farrellymitchell.com/technology-and-innovation/challenges-facing-the-poultry-industry/ (general figures not country-specific).

[21] See University of Johannesburg African Market Observatory (AMO) Price Tracker: https://www.competition.org.za/africanmarketobservatory-amo-price-tracker/#previousreports.

[22] ChickenWatch: https://chickenwatch.org/progress-tracker/?filterK=Cage-free.

[23] The Humane League Fair and Fowl Report 2025: https://thehumaneleague.org/article/fair-and-fowl-2025.

[24] Open Wing Alliance Cage-free Egg Fulfilment Report 2025: https://downloads.ctfassets.net.

signalling institutional support for a production system that countries, businesses and consumers are actively rejecting.

If ARSO is to include battery cage specifications in any form, it must rightly classify them as "*a legacy production system being phased out globally due to welfare and market concerns*", rather than as essential or welfare-guaranteeing. Further, ARSO should include a prominent advisory note in any battery cage standards that such systems are subject to animal welfare limitations, increasing regulatory restrictions, corporate commitments, and consumer rejection in major global markets, and that producers investing in such systems may face diminishing market access and stranded asset risks.

7. PROCEDURAL CONCERNS

In addition to our substantive concerns set out above, we wish to raise procedural concerns regarding the status and handling of the Draft Battery Cage Standards under the African Standards Harmonisation Model ("**ASHAM**") Manual of 2019.[25]

At present, it is unclear at which stage of the ARSO standard-setting process the Draft Battery Cage Standards formally reside. Our understanding is that the standards may be at Stage 3 (Committee Stage). However, some National Standards Bodies ("**NSBs**"), including, for example, Rwanda,[26] have released the Draft Battery Cage Standards for public comment with a deadline set for 24 January 2026. Tanzania has also published the Draft Battery Cage Standards for public comments (with no deadline).[27] At the same time, we have received information indicating that other NSBs understand the standards to be progressing toward the Balloting Stage (Stage 5). Compounding this uncertainty, several NSBs appear not to have made the draft standards publicly available at all.

This lack of clarity and uniformity is concerning because it risks undermining the integrity of the ARSO standard-setting process. Where NSBs operate on differing assumptions about the procedural stage of a draft standard, stakeholders are not afforded equal or meaningful opportunities to participate, and public consultation may be fragmented or inadequately considered before the draft advances.

Under the ASHAM procedures, draft ARSO standards must be circulated to all member countries for a minimum 60-day public comment period, and comments from NSBs and stakeholders must be duly collected and considered before the draft can advance to Stage 5.

In these circumstances, ARSO should ensure that the Stage 4 enquiry process is formally initiated, clearly communicated, and fully complied with across all member states before any further progression of the Draft Battery Cage Standards. This includes ensuring that all NSBs publish the draft standards for public review and that stakeholders across the region are afforded a genuine and equal opportunity to participate.

[25] ARSO: https://www.arso-oran.org/wp-content/uploads/2020/06/ASHAM-P01-African-Standards-Harmonization-Procedures-Manual-2nd-EdNovember2019Editors_Eng.pdf.
[26] Rwanda Standards Board: https://www.rsb.gov.rw/updates/news-detail/public-review-notice-72.
[27] Tanzania Bureau of Standards: https://www.tbs.go.tz/publications/26?page=2.