

WORLD EGG DAY “DEGLARATION”

9 OCTOBER 2026

PROTEIN THAT PROTECTS THE POWERS

Cracking Open Power and Protection in South Africa's Egg Industry

We, the undersigned civil society organisations,¹ acting in the public interest and on behalf of animals, people and the environment, declare that non-human animals are sentient beings with intrinsic value as individuals, and that animal, human and environmental interests are intertwined. This recognition must shape the rules governing South Africa's food system, including animal production systems and industries.

This is not merely a matter of ethics, but one of science, good governance and constitutional legitimacy. The scientific evidence supports conscious experience in many non-human animals, with particularly strong scientific support for mammals and birds.² The capacity of many animals to experience fear, frustration, pain and distress should no longer be treated as an afterthought, and our laws, standards and commercial practices must take full account of these capacities and keep pace as the science develops.

We therefore declare that the following values must inform, and be built into, the frameworks and practices that govern our food system:

- 1. Animal sentience, intrinsic value and dignity:** The Constitutional Court of South Africa has recognised animals as sentient beings capable of suffering and experiencing pain, has affirmed the intrinsic value of animals as individuals, and has linked animal welfare to the environmental right in section 24 of the Constitution.³ Animals are not mere resources for human benefit. We affirm that

¹ This *Degglaration* was considered, reviewed and deliberated on by a group of civil society organisations that attended the first *SHIFT* SA gathering on 2 October 2026 (World Farmed Animals Day). Hosted by Animal Law Reform South Africa (“ALRSA”) at the Sustainability Institute in Stellenbosch, Cape Town, the gathering brought together 13 animal protection organisations and over 20 individual participants working across South Africa (and Africa). *SHIFT* SA, the Strategic Hub for Industrialised Farming Transformation in South Africa, is a collaborative platform for organisations working to transform the systems that shape the lives of farmed animals. Additional organisations have since added their support to this *Degglaration* and Open Letter.

² The Cambridge Declaration on Consciousness (Francis Crick Memorial Conference, Cambridge, 7 July 2012): <https://fcmconference.org/img/CambridgeDeclarationOnConsciousness.pdf>. See also The New York Declaration on Animal Consciousness (19 April 2024), which states that there is strong scientific support for conscious experience in mammals and birds: <https://sites.google.com/nyu.edu/nydeclaration>.

³ *National Society for the Prevention of Cruelty to Animals v Minister of Justice and Constitutional Development and Another* [2016] ZACC 46, paras 56-58: <https://www.saflii.org/za/cases/ZACC/2016/46.html>.

their dignity must be respected, their capacity to flourish must be protected, and our laws, standards and commercial practices must give meaningful effect to this recognition.

- 2. Ubuntu and interconnected justice:** Ubuntu is a recognised constitutional value associated with humaneness, social solidarity and relationality. We draw on it, together with South African jurisprudence linking animal welfare and environmental protection, to affirm an ethic of interconnected justice among people, animals and the environment. Our food system must accordingly protect animals, consumers, workers, the environment and broader society, rather than primarily serving the interests of industry.
- 3. Transparency and accountability:** Consumers must be able to see and understand the systems behind the products they buy. Evidence used to influence public policy and governance must be disclosed so that it can withstand public scrutiny, and those who profit from production must answer for its impacts.
- 4. Social justice and equity:** Power, costs and benefits must be fairly shared. Power imbalances, including concentrated industry power, must not determine the rules or who benefits. The costs of production must not be shifted onto animals, workers, communities and future generations, and *everyone* must have access to affordable, nutritious, and sustainably produced food.
- 5. Diversity and inclusivity:** Diverse, local food systems and producers must be valued and supported, and workers, communities, smaller and historically disadvantaged producers and civil society must be included in decisions that affect them as well as animals and the environment.
- 6. Sustainability and resilience:** Our food system must operate within ecological limits, protect the environment and safeguard the interests of future generations. It must also be resilient, and less reliant on highly concentrated, harmful industrial supply chains.

In recognition of World Egg Day on 9 October 2026, we focus specifically, for purposes of this initiative, on South Africa's egg industry, a significant part of the poultry and food system whose prevailing production practices affect millions of birds and raise serious animal-welfare concerns. Our concern extends to the whole of these animals' lives, including breeding, confinement, painful procedures, chick killing ("culling"), transport, slaughter, and the killing of hens once they are no longer considered profitable, such as end of lay hens. It also extends to the wider harms of industrial animal agriculture for other animals, the environment, public health and society more broadly.

Giving effect to the above values requires **stronger proactive protection**. We therefore call for a **positive legal duty of care** appropriately allocated across the state, industries and individuals, to protect animals proactively - not merely to prevent or respond to cruelty after harm occurs - according to context and stakeholder responsibilities.⁴ We support a transition away from cruel battery cages and the routine killing of male chicks, together with incremental measures - including properly designed and managed systems, and enforceable minimum welfare standards, that materially improve animals' lives.

Responsibility for systemic reform should begin with those with the greatest power to change production and procurement, including government and businesses.

We therefore call on relevant stakeholders to take appropriate action, such as banning and phasing out cruel practices, transitioning to higher-welfare systems with minimum standards, and developing long-term strategies and governance measures for a more just, resilient, transparent, sustainable and compassionate food system. This includes strengthening local and diverse food production, reducing reliance on highly concentrated industrial supply chains, supporting farmers and workers through a **just transition**, and expanding access to affordable, nutritious plant-based foods and alternatives that reduce dependence on animal exploitation.

The open letter, attached as **Appendix I** below, shows how the values put forward in this **Degglaration** can move toward being achieved. It sets out 9 joint demands identifying actions, responsible decision-makers and calls for time-bound implementation where appropriate. We request written responses from those stakeholders by **9 November 2026**. Responses should be suitable for publication and sent to contact@animallawreform.org.

This World Egg Day, we call on those who hold power in the egg industry to answer for whom their practices protect, and who truly pays the price.

⁴ This proposal, together with a number of others reflected in this *Degglaration*, was put forward in the Animal Law Project's *Animal Justice Memorandum (South Africa): A Constitutional Vision for Justice for All Beings* (May 2026): <https://animallawreform.org/wp-content/uploads/2026/05/Animal-Justice-Memorandum.pdf>.

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SOUTH AFRICA



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**ANIMAL ADVOCATES
INTERNATIONAL**



APPENDIX I: OPEN LETTER

- To:** **Government, regulators and public bodies:** The Minister and National Department of Agriculture; the National Agricultural Marketing Council (NAMC); the Competition Commission; the National Consumer Commission (NCC); the Information Regulator; and relevant animal protection, environmental and labour authorities
- And to:** **Standard-setting authorities:** The South African Bureau of Standards (SABS); and the African Organisation for Standardisation (ARSO)
- And to:** **Industry associations:** The South African Poultry Association (SAPA) and the Consumer Goods Council of South Africa (CGCSA)
- And to:** **Self-regulatory bodies:** The Advertising Regulatory Board (ARB)
- And to:** **Private sector businesses:** Egg producers, hatcheries, breeders, food retailers, restaurants, food manufacturers, hospitality companies, and other businesses in the egg supply chain

9 October 2026

AN OPEN LETTER TO SOUTH AFRICA'S EGG INDUSTRY ON WORLD EGG DAY *PROTEIN THAT PROTECTS THE POWERS*

We, the abovementioned civil society and non-profit organisations working in South Africa and across Africa, advance animal welfare and protection, environmental justice, human rights and consumer rights through our respective mandates. On World Egg Day 2026, we call for an end to cruel battery cages, honest information about egg production, and public accountability throughout South Africa's egg supply chain.

Today, 9 October 2026, marks the 30th anniversary of World Egg Day. While the industry's theme, "Protein that Powers and Protects",⁵ is intended to highlight what eggs provide to people, it prompts us to ask: ***who holds the power and who is being protected?***

Behind the eggs are hens confined to cruel battery cages for most of their laying lives; male chicks killed shortly after hatching because they cannot lay eggs and have little

⁵ World Egg Organisation, "Customisable Press Release" (World Egg Day 2026): <https://www.worldeggorganisation.com/our-work/world-egg-day/customisable-press-release/>.

commercial value to the layer industry; workers who may be exposed to occupational hazards; communities and environments affected by intensive production practices; and industry actors and associations with substantial economic and institutional influence over the sector. Celebrating eggs without addressing these realities, and the power imbalances that sustain them, leaves the industry's power intact and its harms insufficiently examined.

This open letter, and the *Degglaration* that precedes it, builds on sustained collective advocacy by civil society organisations across (South) Africa. Over several years, organisations, including many of the abovementioned, have engaged, or attempted to engage, egg industry stakeholders on the lives of chickens, production practices, and environmental, consumer and worker rights, among others. Responses have included non-disclosure of requested information, resistance to civil-society engagement and, in some instances, threats of legal action, as documented in the correspondence and reports cited below. Together, these experiences have reinforced a broader concern: animal protection cannot be separated from constitutional rights,⁶ questions of accountability,⁷ and of who has the power to shape the rules of the food system.⁸

On 27 February 2025, a coalition of 24 African organisations wrote to the CGCSA about the withholding of an industry-funded study which ostensibly found that South Africa is not ready to transition to cage-free egg production, the discouragement of engagement with civil society, and threats of legal action against those raising animal protection concerns (among others).⁹

In January 2026, 35 African organisations wrote to ARSO and 44 of its member countries' standards authorities, objecting to a draft standard that promoted battery cages as essential and claimed they "guarantee the welfare of birds".¹⁰

⁶ For additional context, see the work of the Animal Law Project, including: Wilson A.P. and Gerrans A, A Manifesto for Transforming Animal Protection in South Africa: A Constitutional Imperative, Draft 1, Animal Law Project (20 June 2024): <https://animallawproject.org.za/wp-content/uploads/2024/09/Animal-Law-Project-Manifesto-2024.pdf>.

⁷ ALRSA, Scrambling for the Truth Report, Volume 2 (2024): <https://www.eggssouthafrica.org/wp-content/uploads/2025/02/Scrambling-for-the-Truth-V2.pdf>; and ALRSA, Laying Down the Facts Report, Volume 3 (2025): <https://www.animallawreform.org/wp-content/uploads/2025/02/Laying-Down-The-Facts-Report-V3.pdf>.

⁸ ALRSA Submissions to the South African Human Rights Commission ("SAHRC") in relation to its Investigative Hearing into the Food Systems of South Africa (2026): <https://animallawreform.org/wp-content/uploads/2026/03/ALRSA-SAHRC-Submission-February-2026.pdf> (initial written submission); <https://www.youtube.com/watch?v=8judQzv3wQs&t=1s> (oral submissions); and <https://animallawreform.org/wp-content/uploads/2026/04/ALRSA-SAHRC-Supplementary-Submission-10-April-2026.pdf> (supplementary written submission).

⁹ An Open Letter to the Consumer Goods Council of South Africa ("CGCSA"): Eggsposing Foul Play in South Africa's Egg Industry (27 February 2025): <https://drive.google.com/file/d/1a47OamnuZZ6Uhz4JqYhu17xAZH-N9lap/view?usp=sharing>.

¹⁰ Joint Letter to the African Organisation for Standardisation and African Country Standards Authorities Regarding Draft 'Laying Battery Cages For Chicken - Specification' Standards (January 2026):

On 20 August 2026, 31 organisations wrote to the Department of Agriculture regarding the omission of caged egg production from proposed methods of production standards.¹¹

Civil society organisations also made submissions to the South African Human Rights Commission (“**SAHRC**”) for its 2026 National Investigative Hearing into the Food Systems of South Africa, using the egg and poultry sector to illustrate how concentrated power affects consumers, animals, workers, and small-scale producers, among others.¹²

Despite years of engagement, key demands and questions remain unanswered, and the harms continue. Hens remain confined and suffering, important evidence affecting the public interest remains out of public view, and decisions that affect our environment and shape the lives of animals, workers and consumers are still made without them. Dialogue alone has not been enough. We need answers, and we need action.

The sections that follow examine where power sits in the egg industry and what that means for animals, including hens, consumers, workers and the environment. It is followed by a list of 9 demands that challenge those with the power to effect change.

<https://animallawreform.org/wp-content/uploads/2026/01/Updated-Letter-Regarding-ARSO-Draft-Battery-Cage-Standards-27.01.2026.pdf>.

¹¹ An Open Letter to the National Department of Agriculture Regarding the Exclusion of Caged Egg Production from the Proposed Management Control Systems Standards (20 August 2026): <https://animallawreform.org/wp-content/uploads/2026/08/Final-Open-Letter-Regarding-the-Intention-to-Methods-of-Production-as-a-Management-Control-System-20-August-2026-Copy.pdf>.

¹² ALRSA Submissions to the SAHRC (2026), available at: <https://animallawreform.org/our-work/>. The Southern African Faith Communities’ Environment Institute (“SAFCEI”)’s submission to the SAHRC (February 2026): <https://safcei.vercel.app/uploads/safcei-submission-to-sahrc-27-february-2026-.docx.pdf>.

KEY SELECTED AREAS THAT NEED ADDRESSING

1. THE POWER IMBALANCE IN THE INDUSTRY

South Africa's formal poultry and egg value chain is highly concentrated at multiple stages. According to the Competition Commission, Quantum Foods and Kuipers together supply about 51% of South Africa's egg market,¹³ while major food retailers¹⁴ and the hospitality sector are key routes through which eggs reach consumers.¹⁵ Several major egg producers operate across multiple stages of the value chain, including breeding "stock", hatcheries, feed, poultry production and processing, giving large firms influence across critical inputs and downstream markets.¹⁶ Small and emerging producers, by contrast, face documented barriers to entry, expansion and market access.¹⁷ The Competition Commission's final terms of reference for the Poultry Market Inquiry identify concentration, vertical integration and barriers to independent entry as areas of concern.¹⁸ The SAHRC's 2026 National Investigative Hearing into the Food Systems of

¹³ The Competition Commission, Poultry Market Inquiry Final Terms of Reference (30 September 2025), para 3.2.5: "Market data shows that large firms dominate egg production, with Quantum Foods and Kuipers supplying about 51% of the market." The same paragraph states that approximately 75% of eggs are sold through the formal sector, primarily major retailers and the hospitality sector: https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf. According to the Department of Agriculture, Overview of Poultry Production in SA, a presentation by X Nduku: https://www.arc.agric.za/arc-iscw/CSA-Toolbox/CSA%20Poultry%20Production/Presentations/CSA%20Training_L2%20Poultry%20Module%201.pdf, commercial egg production is dominated by Nulaid (37%), Highveld Cooperative (12%) and Eggbert (7%); and according to the Who Owns Whom Industry Report, The Poultry and Egg Industry in South Africa (2025), <https://www.whoownswhom.co.za/store/poultry-egg-industry-south-africa/>, the companies are Quantum Foods (through its Nulaid brand), Kuipers (Eggbert Eggs) and Top Lay.

¹⁴ Examples of major formal food retailers include Shoprite-Checkers, Pick n Pay, SPAR, Woolworths and Food Lover's Market. See United States Department of Agriculture Foreign Agricultural Service, Retail Foods Annual Report (South Africa), Report Number SF2025-0032 (2025): <https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Retail+Foods+Annual+Pretoria+South+Africa+-+Republic+of+SF2025-0032.pdf> and Filo, Major Food Retail Stores and Their Market Share (2025): <https://askfilo.com/user-question-answers-smart-solutions/major-food-retail-stores-and-their-market-share-list-and-3335353435323638>.

¹⁵ Competition Commission Poultry Market Inquiry Terms of Reference (2025): https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf at page 13: "Approximately 75% of eggs are sold through the formal sector, primarily major retailers and the hospitality sector."

¹⁶ Competition Commission Poultry Market Inquiry Terms of Reference (2025): https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf at page 4.

¹⁷ S Mthombeni et al, An analysis of the barriers to entry and expansion limiting and preventing access to markets for emerging farmers, Working Paper CC2019/03, Competition Commission of South Africa (2019): <https://www.compcom.co.za/wp-content/uploads/2019/10/CC-201903-Mtombeni-S.-Bove-D.-Thibane-T.-Makgabo-B-An-analysis-of-the-barriers-to-entry-and-expansion-limiting-and-preventing-access-to-markets-for-emerging-farmer.pdf>.

¹⁸ Competition Commission Poultry Market Inquiry Terms of Reference (2025): https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf at page 4.

South Africa likewise identified corporate capture, including the concentration of power across the food value chain, as one of its themes.¹⁹

Control over poultry genetics is also highly concentrated. According to the Competition Commission, two companies control approximately 90% of global broiler (chickens produced for their meat) breeds.²⁰ In South Africa, just two commercial breeds - Lohmann and Hy-Line - dominate the layer market; rights to import their grandparent 'stock' are held by a small number of firms, giving a limited number of companies important positions in upstream breeding supply.²¹

When shocks hit a concentrated system, animals themselves can bear immediate and severe consequences. During the 2023 avian influenza outbreak in South Africa, the Competition Commission reported that 8.5 million chickens were culled (killed), and egg prices rose sharply.²² Its food price monitoring later found that producers had absorbed much of the initial cost, but warned that retailers had begun restoring their egg margins before producer prices had recovered,²³ essentially enabling retailers to maintain wider margins at consumers' expense.

Power also shapes how industry rules are made. The Animals Protection Act 71 of 1962 creates binding offences for specified forms of cruelty, but detailed husbandry and housing standards for egg production are not comprehensively prescribed in binding national welfare regulations; sector-specific guidance is found largely in voluntary

¹⁹ SAHRC, Media Statement: SAHRC to hold a National Investigative Hearing into the Food Systems of South Africa (2025): <https://www.sahrc.org.za/index.php/sahrc-media/news-2/item/4413-media-statement-sahrc-to-hold-a-national-investigative-hearing-into-the-food-systems-of-south-africa>; and SAHRC, media advisory on the second leg of the hearing, 6–10 July 2026 (2026): <https://www.gov.za/news/media-advisories/government-activities/south-african-human-rights-commission-convenes-second>.

²⁰ Competition Commission Poultry Market Inquiry Terms of Reference (2025): https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf at page 9. The companies identified are Aviagen Inc. and Cobb-Vantress LLC. Research by GRAIN ("Who rules the roost? Corporate vs community poultry in Africa" (2025): <https://grain.org/en/article/7317-who-rules-the-roost-corporate-vs-community-poultry-in-africa#key-takeaways>), similarly describes a corporate takeover of African poultry sectors, with a small number of global companies (Tyson, EW Group, Hendrix Genetics) controlling the genetic supply of chickens across the continent.

²¹ Competition Commission Poultry Market Inquiry Terms of Reference (2025): https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf at page 12. "For egg-laying hens: Lohmann and Hy-Line dominate the commercial breeds in South Africa. Quantum Foods holds the rights to import Lohmann grandparent stock of the Lohmann chicken breed to South Africa, while Hy-Line South Africa (Pty) Ltd (Hy-line SA) independently imports Hy-Line grandparent stock. The Dekalb Amberlink breed used in egg production is distributed by Serfontein Poultry."

²² Competition Commission, Essential Food Pricing Monitoring Report (2024): https://www.compcom.co.za/wp-content/uploads/2025/03/EFPM-Report_Mar-2025_publication.pdf at page 2.

²³ Competition Commission, Essential Food Pricing Monitoring Report (2024): https://www.compcom.co.za/wp-content/uploads/2025/03/EFPM-Report_Mar-2025_publication.pdf at page 3.

industry codes.²⁴ Industry bodies such as SAPA, founded in 1904, and the CGCSA, which currently states that it represents over 9,000 member companies across the consumer goods, retail and services sectors, play a leading role in shaping sector-wide strategy, advocacy and policy engagement, while civil-society concerns have, in documented instances, been met with non-disclosure or resistance.²⁵ SAPA's influence is also statutory and financial: since 1 April 2026, statutory measures under the Marketing of Agricultural Products Act 47 of 1996 (“**MAPA**”) require covered establishments selling table eggs and egg products to register with SAPA as levy administrator and to submit prescribed records and returns; a separate statutory levy on covered products is payable to SAPA as levy administrator.²⁶ The levy measure specifies broad expenditure categories and provides for Auditor-General audit. Even so, entrusting an industry association with statutory registration, information-collection, levy-administration and enforcement functions heightens the need for strong transparency, conflict-of-interest safeguards and public accountability.

Enforcement is similarly constrained: the National Council of Societies for the Prevention of Cruelty to Animals (“**NSPCA**”), a statutory body with extensive animal-protection enforcement functions, states that it receives no government funding and relies on its own fundraising, legacies and donations, including support from poultry companies such as Astral Foods. This funding structure underscores the need for adequate public resourcing of animal-protection enforcement and transparent safeguards for institutional independence.²⁷

²⁴ Animals Protection Act 71 of 1962, especially section 2 (creating offences for specified acts and omissions constituting cruelty); and, for sector-specific guidance, the voluntary South African Poultry Association (“SAPA”) Code of Practice (2022): <https://www.sapoultry.co.za/wp-content/uploads/2022/06/2022-SAPA-COP.pdf>.

²⁵ See for instance the SAPA's Egg Organisation, “Response to Animal Law Reform South Africa Report Titled “Scrambling for Truth” of September 2024” (18 November 2024): <https://www.sapoultry.co.za/wp-content/uploads/2024/11/SAPA-Egg-Organisation-stance-to-Animal-Law-Reform-SA-Research-.pdf>. SAPA rejected ALRSA's report on the egg industry in its entirety, describing it as misleading, and characterised ALRSA's use of the Promotion of Access to Information Act 2 of 2000 (“PAIA”) as an attempt to “intimidate, abuse, and cause vexatiousness”. An Open Letter to the CGCSA: Eggsposing Foul Play in South Africa's Egg Industry (27 February 2025): <https://drive.google.com/file/d/1a47OamnuZZ6Uhz4JqYhu17xAZH-N9lap/view?usp=sharing>.

²⁶ Department of Agriculture, statutory measures under the Marketing of Agricultural Products Act 47 of 1996, all dated 31 March 2026: GoN 7326, Registration of table eggs and egg products: <https://www.gov.za/documents/notices/marketing-agricultural-products-act-registration-table-eggs-and-egg-products-31>; GoN 7327, Records and returns for table eggs and egg products: <https://www.gov.za/documents/notices/marketing-agricultural-products-act-establishment-statutory-measure-records-23>; and GoN 7328, Establishment of statutory measure and guideline price for table egg levies: <https://www.gov.za/documents/notices/marketing-agricultural-products-act-establishment-statutory-measure-and-guideline>. The levy measure designates SAPA as levy administrator, specifies broad expenditure categories and provides for annual Auditor-General audit.

²⁷ NSPCA, PAIA Manual (2025), p 6, states: “The NSPCA generates its own funds, relying on legacies and donations. No Government funding is received”: <https://nspca.co.za/wp-content/uploads/2025/02/PAIA-Manual-2025.pdf>. Astral Foods, a major integrated poultry producer, reports financial and in-kind support

It is within this system of concentrated power that the implicated animals, including hens, whose interests are the least represented, are bred, confined, exploited and killed.

2. THE HENS BEHIND THE EGGS

SAPA's 2024 Annual Report states that 98.6% of eggs in the producer sample used for its housing-system statistics were produced in cages.²⁸ SAPA states that the sample represented 29.0% of forecast national egg volume and cautions that the statistics should be read as trends rather than precise national estimates. Even with that limitation, the available industry data point to the continuing dominance of caged production. For hens, that means lives constrained by a system designed around output.

Conventional battery cages severely restrict movement and prevent hens from expressing important natural behaviours, including nesting, foraging, perching and dust-bathing.²⁹ Restrictive housing can compromise bone health and cause frustration and stress. SAPA's 2022 Code permits beak treatment in layer birds, including day-old laser treatment or hot-blade cutting and cauterisation by 10 days; SAPA has separately stated that de-toeing is not used on commercial layer chickens. These procedures, and the feather-pecking and cannibalism risks to which the Code links beak treatment, raise further welfare concerns.³⁰ These conditions can also affect hens' health and physiological functioning, with implications for egg quality.³¹ The European Food Safety Authority's 2023 assessment recommends cage-free housing and measures to prevent welfare harms.³²

to the NSPCA in its 2024 and 2025 reporting: <https://www.astralfoods.com/astral-cares/care-for-animals/> and <https://www.astralfoods.com/investor-centre/results-and-reports/>.

²⁸ SAPA, Annual Report (2024): <https://www.sapoultry.co.za/wp-content/uploads/2025/06/SAPA-Annual-Report.pdf>. This is a reported share of egg production in 2024, not a count or percentage of individual hens.

²⁹ European Food Safety Authority ("EFSA"), Opinion of the Scientific Panel on Animal Health and Welfare on the welfare aspects of various systems of keeping laying hens, EFSA Journal 3(3), 197 (2005), <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/j.efsa.2005.197>; and M.S Dawkins & S Hardie (1989). Space needs of laying hens. British Poultry Science, 30(2), 413-416: <https://www.tandfonline.com/doi/pdf/10.1080/00071668908417163>.

³⁰ SAPA Code of Practice (2022), section 8.1, permits day-old laser beak treatment or hot-blade cutting and cauterisation by 10 days and states that the continuing need for beak treatment is linked to cannibalism and feather pecking risks: <https://www.sapoultry.co.za/wp-content/uploads/2022/06/2022-SAPA-COP.pdf>. SAPA has separately stated that it does not de-toe commercial layer chickens: <https://www.sapoultry.co.za/sapa-egg-organisation-response-to-animal-law-reform-south-africa-report>. See also EFSA, Welfare of laying hens (2023): <https://doi.org/10.2903/j.efsa.2023.7789> and MR Baxter (1994), "The welfare problems of laying hens in battery cages", Veterinary Record 134(24), 614–619 <https://europepmc.org/article/med/7941260>.

³¹ P.G.S. Pires et al (2021) 'The relationship between egg quality and hen housing systems- A systematic review', Livestock Science, 250, 104597: <https://doi.org/10.1016/j.livsci.2021.104597>. M.K. Sharma et al (2022) Effect of housing environment and hen strain on egg production and egg quality as well as cloacal and eggshell microbiology in laying hens. Poultry Science, 101(2), p.101595, available at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC8703072/>.

³² EFSA, "Welfare of laying hens" (21 February 2023): <https://www.efsa.europa.eu/en/plain-language-summary/welfare-laying-hens>; full scientific opinion: EFSA Journal (2023) 21(2), 7789: <https://doi.org/10.2903/j.efsa.2023.7789>.

The egg industry's harms begin before hens reach the laying house. Male chicks from layer 'strains' cannot lay eggs and are not bred for efficient meat production; they are therefore routinely treated as economically unwanted and killed, a practice permitted under SAPA's own Code.³³ The NSPCA states that male chicks in South African layer hatcheries are killed by maceration, in which live chicks are fed into machines with rotating blades,³⁴ and SAPA has likewise stated that male layer chicks are currently macerated rather than gassed. SAPA's Code also recognises specified gas killing as an accepted disposal method for non-saleable chicks. The routine killing of newly hatched chicks because they are commercially unwanted must form part of any honest discussion about egg production.

Chickens, including egg-laying hens and male chicks, have interests of their own. South Africa's Constitutional Court has recognised animal sentience and the intrinsic value of animals as individuals, linking animal welfare to constitutional environmental protection.³⁵ Our laws, standards and commercial practices must give meaningful effect to that recognition.

3. THE INFORMATION BEHIND THE CLAIMS

Access to information remains a central obstacle to reform in the egg industry. One example is the study commissioned by SAPA in 2020, conducted by the NAMC ("**NAMC Study**") on South Africa's egg-layer systems and the feasibility of transitioning to cage-free production. Since 2023, various civil society organisations have sought access to the full study under the Promotion of Access to Information Act 2 of 2000 ("**PAIA**") from SAPA, the NAMC, the CGCSA and the National Department of Agriculture, and have also approached the Information Regulator for recourse. The full study remains unavailable to the public. Only a brief executive summary,³⁶ which lacks references to sources or additional information informing the findings of the NAMC Study, has been released. In 2023, the CGCSA advised its members to refer to the NAMC Study when responding to advocacy groups,³⁷ while later admitting to holding only the executive summary and not

³³ The voluntary SAPA Code of Practice (2022), available at: <https://www.sapoultry.co.za/wp-content/uploads/2022/06/2022-SAPA-COP.pdf>, accepts specified gas killing and high-speed maceration for disposal of "non-saleable" chicks. SAPA's Egg Organisation has also stated that male layer chicks in South Africa are currently "immediately macerated rather than the old method of disposal by gassing": <https://www.sapoultry.co.za/sapa-egg-organisation-response-to-animal-law-reform-south-africa-report/>.

³⁴ NSPCA, "Hatcheries": <https://nspca.co.za/farm-animal-protection/hatcheries/>.

³⁵ *National Society for the Prevention of Cruelty to Animals v Minister of Justice and Constitutional Development and Another* [2016] ZACC 46, paras 56–58: <https://www.saflii.org/za/cases/ZACC/2016/46.html>. See also NSPCA, "Concourt Rules In Favour Of NSPCA", <https://nspca.co.za/concourt-rules-favour-nspca/>.

³⁶ Executive Summary "Analysis of the South African Egg Layer System" (14 March 2023): <https://www.sapoultry.co.za/wp-content/uploads/2023/03/Summary-of-the-NAMC-Egg-study.pdf>.

³⁷ CGCSA letter addressed to its members "Animal Welfare Calls For A Ban Of Cage Egg Production In South Africa" (9 May 2023): https://drive.google.com/file/d/1sX_Q7Csz8jM5nTDMEymZGZF-Pt_tBaCO/view?usp=sharing.

having access to the full study.³⁸ Evidence used to resist reform must be open to independent or public scrutiny.

Consumers need and deserve clear information about their food systems, the industries behind them, and how their food - including eggs - is produced. The National Department of Agriculture's June 2026 consultation regarding its Intention to Register Methods of Production as a Management Control System under regulations of the Agricultural Product Standards Act 119 of 1990 ("**APSA**"), proposed management-control categories for production-method claims, including barn eggs, free-range and pasture-raised products, but no equivalent category for caged eggs.³⁹ Regulating selected claims while leaving the dominant production method unnamed does not give consumers and the broader public a complete picture.

The Consumer Protection Act 68 of 2008 prohibits misleading marketing and representations. Section 32 of the Constitution of the Republic of South Africa, 1996 ("**Constitution**") protects access to state-held information and privately held information required to exercise or protect rights.⁴⁰ We call for mandatory disclosure of production systems on egg product labelling so that consumers can make informed choices, including when eggs are sold loose or used as ingredients.

4. THE PEOPLE BEHIND PRODUCTION

For the workers involved in these production systems - worker protection must be part of this discussion. Poultry and egg industry workers can face respiratory risks from organic dust and biological agents.⁴¹ Employers must prevent harmful exposures, provide training and protective measures, and ensure that workers can raise concerns without retaliation.⁴² Workers who are expected to carry out painful procedures on and kill

³⁸ See ALRSA's dedicated egg website, "Industry Body Engagement" page, for correspondence concerning efforts to obtain the NAMC Study. The page, updated through 28 September 2026, records that the full study remained unavailable publicly at that date: <https://www.eggssouthafrica.org/industry-body-engagement/>.

³⁹ Department of Agriculture, Notice No. 7597 of 19 June 2026: Intention to Register Methods of Production as a Management Control System: https://www.gov.za/sites/default/files/gcis_document/202606/54853gon7597.pdf.

⁴⁰ Consumer Protection Act 68 of 2008, sections 29 and 41: https://www.gov.za/sites/default/files/32186_467.pdf.

⁴¹ National Institute for Occupational Health, "Health effects associated with exposure to hazardous biological agents and their constituents in poultry farming": <https://www.nioh.ac.za/health-effects-associated-with-exposure-to-hazardous-biological-agents-and-their-constituents-in-poultry-farming/>.

⁴² Section 8(1) of the Occupational Health and Safety Act 85 of 1993 requires every employer, as far as reasonably practicable, to provide and maintain a working environment that is safe and without risks to employees' health. Section 8(2) specifically requires employers to: identify health and safety hazards; determine appropriate precautionary measures; eliminate or mitigate hazards before resorting to PPE; and ensure safety in relation to the production, processing, use, handling and storage of substances.

animals should have access to appropriate psychosocial support and safe working conditions.

5. OUR SHARED ENVIRONMENT

Section 24 of the Constitution protects the right to an environment that is not harmful to health or wellbeing and requires reasonable measures to prevent pollution and ecological degradation.⁴³ Those responsible should identify, prevent, and address the true costs of egg production, rather than shifting them onto animals, workers, communities, consumers, and future generations.

Egg production also has a substantial water footprint, much of it embedded in feed production. Global estimates are in the thousands of litres per kilogram of eggs when green (rainwater), blue (surface and groundwater) and grey (pollution-assimilation) water are combined; this is not equivalent to thousands of litres of direct freshwater abstraction and varies by geography and production system.⁴⁴ Claims about sustainability must account for those impacts and be supported by evidence, and changes in housing require careful environmental planning alongside animal protection.

Affordability and food security matter. So do fair labour conditions and opportunities for smaller producers.⁴⁵ A just transition which prohibits harmful practices and transitions toward higher welfare production systems and standards must confront these structural concerns while protecting access to adequate food.

⁴³ Constitution of the Republic of South Africa, 1996, sections 23, 24 and 32.

⁴⁴ M M Mekonnen and A Y Hoekstra, “A Global Assessment of the Water Footprint of Farm Animal Products” (2012) 15 *Ecosystems* 401–415, <https://doi.org/10.1007/s10021-011-9517-8>. The study estimates a global average total water footprint for eggs of approximately 3,265 litres/kg, comprising green, blue and grey water; it is a global estimate, not a South African farm-level freshwater-withdrawal figure .

⁴⁵ Competition Commission, Poultry Market Inquiry Final Terms of Reference (30 September 2025), GN 6687, Government Gazette 53445, especially paras 1.7–1.8 and section 4: https://www.gov.za/sites/default/files/gcis_document/202510/53445gon6687.pdf.

OUR JOINT DEMANDS

We call on the following stakeholders to act within their respective powers, mandates and responsibilities in respect of the following 9 demands:

1. Make production methods visible

Department of Agriculture, consumer authorities, and businesses operating across the supply chain: Introduce mandatory, prominent and independently verifiable production-method labelling for all shell eggs, including loose and online sales, and require meaningful disclosure for egg products and ingredients. Businesses operating across the supply chain should implement such requirements and, pending binding rules, adopt equivalent clear disclosure voluntarily. Identify caged production explicitly on egg packaging and labels, distinguishing conventional battery cages from enriched or other cages, alongside clearly defined barn, free-range, pasture-raised and other systems. Add caged eggs to the proposed production-method framework without presenting registration as a welfare endorsement.

2. End battery cages through a binding phase-out and verified corporate commitments

Minister and Department of Agriculture, legislators, producers and purchasers: Establish a legally enforceable phase-out of conventional battery cages with a fixed prohibition date, interim milestones and a halt to new installations. Prevent replacement of conventional battery cages with other systems that continue to severely constrain hens. Support and incentivise a transition away from all cages toward properly designed and managed cage-free systems that enable hens to express key behaviours, including well-managed barn, free-range and pasture-based systems as appropriate, with safeguards for animals, workers and the environment. Retailers, restaurants, caterers, hotels, food manufacturers and other purchasers should adopt public, time-bound commitments to transition to 100% non-caged (cage-free) sourcing across shell eggs, egg products and ingredients; publish annual progress, procurement volumes and percentages, verification methods and any exceptions; honour existing deadlines, disclosing reasons and corrective steps where they have been missed; and use purchasing agreements and fair contracts to support suppliers' transition.

3. Centre animal sentience and establish enforceable welfare protections and standards throughout the hens' life cycle

Department of Agriculture, SABS, ARSO, SAPA and other relevant authorities (including trade authorities): Take steps to centre the sentience, intrinsic value, interests, and capacity for flourishing of animals - including layer hens -

when drafting norms and standards, regulations and other governance instruments, or when considering measures that affect them. Give effect to this by:

(a) developing detailed, science-based **minimum legally binding** protections for breeders, chicks, pullets and laying hens, covering housing, handling, transport, disease control and killing. Use the Five Domains model as a guiding framework, addressing: nutrition, physical environment, health, behavioural interactions and mental state.⁴⁶ Address stocking density, enrichment, injuries, painful procedures and positive welfare. Give requirements legal force through appropriate legislation; voluntary industry standards alone are insufficient.

(b) Strengthening and developing voluntary and industry standards and codes that reflect higher-welfare systems and practices through transparent consultation with civil society, independent auditing and public reporting. Such standards must not delay or substitute for legal protection.

(c) Advancing African standards that protect animals by opposing adoption of standards that promote battery cages as a welfare solution. The January 2026 committee draft stated that the battery-cage system “guarantees the welfare of birds”; any revised draft should remove that unsupported claim and be published for transparent public consultation. Strengthen cage-free standards and ensure that any animal-welfare claims are evidence-based. Safeguard African countries against becoming destinations for obsolete battery-cage equipment. These demands build on the January 2026 civil society letter to ARSO and its member-country standards authorities.⁴⁷

4. End the routine killing of male chicks

Hatcheries, producers, egg purchasers and the Department of Agriculture:

Establish a time-bound plan to end killing newly hatched chicks solely because of their sex, including through maceration, gassing or other practices. Publish the numbers of chicks killed and methods used. Independently assess, invest in and incentivise alternatives for welfare, including sufficiently early in-ovo sex determination where scientifically justified. Until the practice ends, competent enforcement authorities, including the NSPCA and SPCAs within their statutory powers, should enforce applicable

⁴⁶ DJ Mellor and others, “The 2020 Five Domains Model: Including Human–Animal Interactions in Assessments of Animal Welfare” (2020) 10 *Animals* 1870: <https://doi.org/10.3390/ani10101870>.

⁴⁷ Joint Letter to ARSO and African Country Standards Authorities Regarding Draft Laying Battery Cages for Chicken Specification Standards (January 2026): <https://www.animallawreform.org/wp-content/uploads/2026/01/Updated-Letter-Regarding-ARSO-Draft-Battery-Cage-Standards-27.01.2026.pdf>, quoting the committee draft’s claim that the laying-hen cage system “guarantees the welfare of birds”. ARSO’s current standards-harmonisation page continues to list WD-ARS 1241, Laying battery cages for poultry — Specification, as a standard under development: <https://www.arso-aran.org/standards-harmonisation-work/>.

anti-cruelty protections under the Animals Protection Act 71 of 1962 (“**APA**”) in relation to the methods and conditions of killing; the Department of Agriculture should strengthen oversight within its mandate; and killing methods and equipment should be independently monitored.

5. Release the full NAMC study and supporting evidence and fund an independent and fair transition

- (a) **SAPA, NAMC, the Department of Agriculture and other record holders:** Publish the full study, its terms of reference, funding arrangements, methodology, assumptions and supporting data, subject only to lawful and specifically justified legal limitations. Entities relying on the study should disclose exactly what they have reviewed and make the evidence underlying their positions publicly accessible.
- (b) **Government, NAMC, funders, independent researchers and major egg purchasers (such as retailers):** Commission an independent, publicly accessible assessment of caged production, transition pathways and their wider costs (externalities). Examine affordability, animal welfare, employment, environmental impacts and barriers to market entry. Provide targeted finance, training and procurement opportunities for smaller and historically disadvantaged producers to support less harmful systems. Include research into welfare-oriented, locally adapted breeds without assuming that breed choice alone resolves production harms.

6. Examine barriers to fair competition and reform and address corporate concentration in the poultry and egg sectors

Competition Commission, Department of Agriculture and relevant agricultural authorities: Address the concentration of control over poultry genetics by strengthening public oversight of the poultry breeding sector and investing in indigenous breeds, local breeding programmes and small-scale producers, so that farmers are not locked into dependence on commercially controlled hybrid genetics. The Competition Commission should use the Poultry Market Inquiry to investigate competition concerns in the egg value chain, investigate evidence of prohibited conduct through the appropriate processes, and enable participation by civil society and smaller producers, and publish findings and remedies within the Commission’s mandate.

7. Prevent humane-washing and misleading animal welfare and sustainability claims

ARB, NCC, Department of Agriculture and advertisers: Enforce existing rules against misleading claims and develop specific guidance on animal-welfare advertising

and preventing humane-washing and other forms of “washing”. Require substantiation for words and imagery implying “humane” treatment, happiness, freedom, environmental responsibility or similar terms. Claims must identify their scope, standards and independent verification. Cage-free status alone must not be used to imply that every welfare concern has been resolved.

8. Protect workers and affected communities

Employers, labour authorities and environmental authorities: Enforce applicable labour, occupational health, environmental and water protections in relation to industry role-players. Prevent harmful exposures and pollution, provide workers with access to psychosocial support, and create accessible channels for reporting concerns without retaliation. Publish relevant monitoring information and ensure that workers and affected communities participate in decisions about production practices and transition plans.

9. Enforce the law and engage transparently

Competent authorities, the NSPCA and SPCAs within their statutory powers, industry bodies and businesses: Strengthen inspections, investigate complaints and pursue appropriate enforcement under existing laws, including the APA. Government must adequately resource its responsibilities. SAPA and CGCSA should facilitate constructive engagement with civil society, disclose the evidence and interests informing their positions, and support independently monitored progress. Publish substantive responses to these demands and a timetable for action.