

European Commissioner for Agriculture and Rural Development
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Subject: : Housing orders and free range sector

Dear Mr Wojciechowski,

I write to you on behalf of EUWEP, the European Union of Wholesale with Eggs and Egg Products and Game. EUWEP is the representative body of European Egg traders, Egg graders and Egg processors. EUWEP is registered in the transparency register with number 36546161539-21.

The Friedrich-Loeffler Institute described the current Avian Influenza epidemic in Europe as exceptional. All over Europe, and not limited to those regions with significant bodies of water, outbreaks of Avian Influenza both in wild birds as well as in commercial birds have been reported. Other major research institutes have confirmed this finding. Losses are particularly high in Italy, but there is also a severe impact in smaller producing countries such as Denmark.

Following the outbreaks many European member states enforced a housing order at the end of October/ beginning of November (see attachment). This commencement period indicates that from mid-February and the beginning of March 2022, the availability of free range eggs in the European Union will be significantly limited. This has a devastating effect on the free range egg sector in the EU, particularly as this is the third year in a row that supplies of free range eggs have been limited for a prolonged period.

The continuity of the free range sector is at stake. The experience over recent years shows that it takes around half a year to regain 70-80% of the previous free range market. The remaining 20-30% costs around a year to get it back - if these consumers return at all.

The housing order should be maintained as long as necessary on account of the high pressure of the virus on both wild birds and commercial flocks. Public opinion is unlikely to accept the lifting of the housing order if such an action would then lead to the unnecessary culling of wild birds.

During the process of the revision of the Marketing Standards EUWEP has addressed the issue of alignment of the Marketing Standards with the new Organic Regulation EU 2018/848 art. 1.9.4.4. §d: *"..However, laying hens shall have access to an open air area for except where temporary restrictions have been imposed on the basis of Union legislation..."*. EUWEP proposes to align the Marketing Standards of free range eggs with the Organic Regulation on this point, thereby eliminating the ongoing inconsistency between the two.

Due to the successive impact of repeated withdrawals of free range eggs from the market over the last few years, and the widening reach of Avian Influenza as seen in this season's unprecedented severe outbreak, together with the revision of the Marketing Standards underway, EUWEP strongly recommends that now is the right time to give serious consideration to the alignment of the regulations such that when the Chief Veterinarian Officer (CVO) decides to house the birds due to a high pressure of Avian Influenza viruses, the 16 weeks period should not apply.

Whilst the current Marketing Standards for free range eggs are being revised we would like to stress the dire situation free range egg poultry farmers are currently in and request immediate derogation for the downgrading of free range eggs as the 16 week limit comes into effect end of February/early March.

If you would like to discuss this proposal and/or any other matter relating to eggs, I would be happy to meet with you in Brussels or by any channel (virtual meeting etc) that suits you.

I look forward to hearing from you.

Kind regards,



Clara Hagen
Secretary General EUWEP

Attachment: Overview of housing orders in Europe

Country	Housing order	Since (date)	16 wks ends
Belgium	Whole country	15-11-2021	± 08-03-2022
Denmark	Whole country	1-11-2021	± 20-02-2022
France	Whole country	05-11-2022	± 26-02-2022
Germany :	<ul style="list-style-type: none"> Landkreis Dithmarschen Parts of Mecklenburg-Vorpommern Osnabruck <p>The Housing Order ist still limited to so called „risk areas“ (along rivers, near wetlands, resting places of wild birds...), in different Federal states.</p> <p>In Brandenburg for example we have a housing order for all risk areas. So it could be that parts of a Landkreis are under the order and others are not. So it is nearly not possible to put in an overview.</p>	<p><01-11-2021</p> <p><01-11-2021</p> <p>15-11-2021</p>	± 08-03-2022
Ireland	Whole country	20-11-2021	13-03-2022
Italy	Whole country	15-10-2021	± 05-02-2022
Netherlands	Whole country	26-10-2021	16-02-2022
Outside EU (non-EU country)			
UK	Whole country	29-11-2021	± 22-03-2022