

To whom it may concern

November 21, 2015

Dear Friends,

Re: Free Range Egg Labeling Consultation Paper.

I write as someone who has raised chickens for eggs at home when I could since 1950 and have come to believe that although chickens may not be the brightest, they are still creatures who must not be mistreated. They need room to move and scratch and their overcrowding/debeaking is cruelty.

When I do not have my own hens, I always buy free-range eggs, despite needing to be careful with my money. And I want to know that I am buying genuine free-range eggs. In that regard, a legislated definition of free-range eggs is critical to stopping the misleading of consumers and the unfair market that confronts genuine free-range farmers.

If it is to be meaningful, the definition of ‘free-range’ must include specific conditions like stocking density and husbandry practices and for that reason I believe the following definition of ‘free-range’ should be written into the legislation:

*“Free-range production systems must have a maximum stocking of 1,500, as outlined in the Model Code of Practice. It must be ensured that hens can, and do, move about freely on an open range on most days. De-beaking is not permitted as a routine procedure.”*

Moreover

- I support ‘free-range’ remaining a single, premium label. Labels like “premium free-range” and “access to range” will only cause further confusion and potentially allow for the exploitation of consumers.
- Production systems that stock hens intensively at 10,000 birds per hectare cannot possibly be considered humane and should not be permitted to use the ‘free-range’ label.
- Independent, third party accreditation of farms to is the only way to ensure they adhere to agreed standards and is critical to restoring consumer confidence.

Yours sincerely,

Martha Ansara