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The Manager,  
Consumer Policy Unit,  
Small Business, Competition and Consumer Policy Division,  
The Treasury,  
Langton Crescent,  
Parkes ACT 2600

Dear Sir/Madam,

Submission in relation to the Free Range Egg Labelling Consultation Paper

Thankyou for the opportunity to contribute to this discussion paper.

For many years I have followed the evolving struggle by genuine free range egg producers to secure fairness in the marketing of their product. They compete with the sale of eggs marketed as free range which are produced under farming practices that I believe could not be justifiably called free range, offered for sale at a cheaper price in the big supermarkets. As a consumer, I believe that there is no good reason why fowls should be grown in conditions which don't allow them a safe and healthy environment. In other words, I am opposed to what are called battery farms where hens are kept in sheds or in cramped conditions.

As you will be aware, there have been a number of documentary programs exploring the issues around this subject and I am quite well informed of the debate. I am happy to pay more for genuine free range eggs, but I resent the fact that I can't buy them in my local supermarket. I have to travel for 20km to buy genuine free range eggs. As a pensioner, I can't do this every time I need eggs. It took me some time to realise that this was the only way I could get truly free range eggs. Due to the clever marketing and labelling of their product, I was duped into believing that at least some of the eggs in my supermarket labelled "free range" were actually free range when they were not. I urge you to end this problem once and for all by legislating to guarantee that eggs marketed as "free range" will be produced under conditions that meet reasonable standards to qualify as genuinely free range. That is as follows:

- ⤴ that fowls are produced in conditions which accord with the Model Code of Practice, with a maximum stocking rate of 1,500 birds per hectare
- ⤴ that fowls must be outside, and able to forage freely on most days
- ⤴ that only birds produced under these conditions can be marketed as "free range"
- ⤴ that labelling which suggests free range conditions such as "access to range" be prohibited so that consumers are confident of the product they are purchasing
- ⤴ that an independent licensing authority ensures compliance with the legal requirements for the labelling and marketing of free range eggs
- ⤴ that debeaking is only permitted as an essential veterinary procedure

To conclude, I think that the unfairness of the current arrangements for free range egg producers must end, and that consumers should be able to purchase free range eggs with the confidence that they are buying a genuine product. Please act to legislate for the marketing and labelling of free range eggs in a way which guarantees that they are produced under safe and humane conditions.

Thankyou,

Ms Julie Castles