

IdleWilde Open Range Farm

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

Dear Treasury

Re: Free Range egg labelling consultation

We appreciate the opportunity to provide the following comments to Treasury on free range egg labelling.

Our names are Darren and Liane and we own and run Idlewilde Open Range Farm. We are a chemical free farm situated high in the mountains on the Bulga Plateau at Elands on the Mid-North Coast of NSW. We have 1500 hens that are free to roam on open hectares from morning to night on green pastures and down into gullies where they forage in leaf litter and mulch, in the fresh mountain air, loyally watched over by our Maremma sheepdogs.

At the moment, without a free range standard, we are not being recognized for the true “low stocking density”, free to roam farm we operate. We are a genuine and transparent open range farm who has to compete with large commercial size operations that appear to claim whatever they choose to on their label. We agree that there is a place for the large scale operations, as we do need to feed the masses. But we think it is fair to say that **true free range eggs CANNOT be achieved on a commercial scale**, hence, they should not be allowed to use the definition free range. There is nothing free about 10,000 birds to 1 hectare or 50,000 birds in a shed.

We support option 3a of the consultation as we believe that 1500 birds to 1 hectare are what we and consumers’ expectations of true free range is. 1500 birds to 1 hectare are sustainable for ground regeneration and rotation of birds. And while stocking density isn’t necessarily an indicator of animal husbandry/welfare, **we are of the strong opinion that any option chosen needs the disclosure of stocking density included on egg labels as an imperative to stopping the consumer from continuing to be misled.**

Our only concern with option 3a is the mention of beak trimming. We currently buy our birds at “point of lay” (16 weeks old) from a breeder that does employ the practice of beak trimming as a definite animal welfare consideration, as do most large scale breeders. We worry about the cost of sourcing and buying birds that aren’t beak trimmed. We feel that the cost of birds that aren’t beak trimmed will blow out our already fine profit margin. At this stage we have had no time to look into this.

The option we support will help our business through due recognition as a **true free range egg** producer delivering premium quality eggs to the consumer and eliminating competition with large commercial operators who are using the definition free range.

November 24, 2015

Consumers will benefit from such a standard as they will have the confidence to purchase **true free range eggs** and know that they are coming from a low stocking density farm with animal husbandry and welfare in mind. At present, with no free range standard, they are being completely deceived and misled as to the environment in which the eggs they are purchasing are produced.

We feel that the definition “most hens go outside on most ordinary days” does not reduce the current problem and consumers would have no greater ability to identify whether the free range eggs they are purchasing are in line with their values and expectations. This should come under an “access to range” category. Once again, **disclosure of stocking density** on egg labels is imperative to stopping the consumer from continuing to be misled. Let the consumer decide which eggs they would like to purchase by using the stocking density as a guide first and foremost.

We truly hope this consultation results in a fair standard of the definition **free range** for the small time egg producers who deserve the recognition they deserve.

Yours Sincerely

Darren Hosemans and Liane Lord