

## **FREE RANGE EGG LABELLING CONSULTATION PAPER – October 2015**

### **SUBMISSION**

#### **Why I no longer buy eggs**

I am a consumer and someone who cares about hen welfare. I would NEVER buy cage eggs, and I think they should be banned because they impose so much cruelty on hens. However, so long as they are legal, they should be clearly labelled 'Cage eggs'.

I do not buy many eggs these days because of the inadequate and misleading confusion in egg labelling. I want 'free range' labels to include stocking densities, and I want to see labels that tell me the eggs I buy are from hens that have NOT had their beaks trimmed and have NOT been subject to induced moulting.

I welcome the changes that I hope this consultation will bring. The term 'free range' has been much abused by intensive farming businesses inaccurately applying that label, when hens are confined to cages or overcrowded barns with little or no access to outdoors where they can scratch and have dust baths and exhibit their normal behaviour.

This confusion over labelling is not fair to genuine free range egg producers who care for their hens' welfare.

#### **Explicit Labelling**

Simply labelling 'free range' or the proposed 'premium free range' does not give certainty to consumers about the eggs they buy. Nor does 'free to range'. Range where? This is not explicit. The label 'free to range outside' provides consumers with some certainty.

A label that includes the words 'outdoor maximum 1500 hens per hectare' is meaningful for consumers, especially when they could compare it with a label that says 'maximum 20,000 or 10,000 hens per hectare' – these latter densities are clearly not 'free' in anyone's language.

Free range producers who have fewer than 1500 birds to the hectare can label their eggs as 750 hens per hectare and so on. The label 'free range' should only ever appear on an egg carton if it has the stocking density and hen welfare details alongside. Only then can consumers know they are buying from a reputable and caring egg producer who provides hens with a better life.

Producers could include additional information on the labelling about protection from predators and shelter in hot/cold weather.

## **Conditions and stocking densities in barns or sheds**

Conditions for hens in sheds or barns need to provide nests for egg laying, perches for roosting and, most importantly, there should be a maximum of 9 birds per square metre

## **All those who produce and process eggs must comply**

Everyone selling eggs must comply with stocking density labelling – including those who sell eggs at farmers markets and at the farm gate.

I would go even further: many restaurants say on their menus that their eggs are 'free range'. How does the consumer trust this? I have been in restaurants and asked if they use eggs that are 'free range'. When the waitress checks, sometimes I believe them, but other times a perfunctory reply that they are free range does not convince me, and I choose not to order anything on the menu with eggs in it. This, again, is not fair to those restaurants that do the right thing.

Furthermore, there is a need for these standards to apply to eggs used in the processed foods we buy in supermarkets, bakeries and eggs used by the catering industry.

All packaged foodstuffs sold in Australia have lists of ingredients on their labels. A label giving hen density per hectare in brackets after the 'Contains egg' information, for example, would give certainty to consumers. There is no doubt it would offer transparency to consumers and financial security for those genuinely using free range eggs in their products. It is a selling advantage these days, because consumers are mindful of hen welfare.

Consumers seeking genuine free range eggs will quickly become accustomed to looking at labels for lower stocking densities and other hen welfare information. Consumers do not need to have an intimate knowledge of industry practices to make such comparisons. For example, if there is a reference on the label to NO beak trimming etc, consumers can buy confidently.

## **My comments on Options in the consultation paper**

I prefer option 3.

The 'Free Range' label should apply to eggs from hens who are able to move about freely on an open range on most ordinary days. The stocking density listed on the label should be 1500 birds per hectare (or fewer). (The indoor stocking density should be a maximum of 9 hens per square metre).

For clarity, I prefer two descriptive labels for 'barn':

(a) 'Barn' for those that do not allow hens freedom to range outside. (With a maximum of 9 birds per square metre)

(b) 'Barn - freedom to range outside' (With indoor stocking density of a maximum of 9 hens per square metre. There should be a maximum stocking density of 10,000 hens per hectare.)

Option 3b is confusing. As I said earlier, the label 'free to range' needs to be explicit. Therefore I suggest the label should be 'free to range outside'.

### **'Defence' Provision**

I do NOT support the Option 2a 'defence' provision as I do not think it is necessary. Genuine free range producers would be aware of and have confidence in what is required through the labelling categories and from the descriptions in the standard.

### **Conclusion**

Please give consideration to my comments on the development of a national information standard for the labelling of 'free range' eggs, which, I sincerely hope, will lead to consumer confidence and protect those producers who want to ensure their hens have the most comfortable lives possible. It is long overdue.

**Jan Kendall**