

Dear Madam/Sir,

**SUBMISSION
FREE RANGE LABELLING CONSULTATION**

Please accept my comments below as my submission in relation to the Free Range Egg Labelling Consultation Paper:

- I believe a legislated definition of free-range eggs is critical to ending the exploitation of consumers and the unfair market that confronts genuine free-range farmers.
- In order to meet consumer expectations of animal welfare, it is essential that the definition of 'free-range' includes specific conditions like stocking density and husbandry practice.
- Taking this into account, I believe that the following definition of 'free-range' should be legislated:
 - 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.

Further comments on the consultation paper:

- I support 'free-range' remaining a single, premium label. New labels like "premium free-range" and "access to range" will cause further confusion and potentially allow for the exploitation of consumers to continue.
- Production systems that stock hens intensively at 10,000 birds per hectare should not be permitted to use the 'free-range' label.
- Independent, third party accreditation of farms to ensure they adhere to agreed standards is critical to restoring consumer confidence.

Thanks you for the opportunity to comment.

Sincerely,

Jan O'Leary

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