

Dear Manager  
Consumer Policy Unit  
Small Business, Competition and Consumer Policy Division,

Of the available options as proposed in the Consultation Regulation Impact Statement, Free Range Egg Labelling, I mostly support Option 3a, with the understanding that this means that ALL eggs sold commercially will be retailed with the labelling of either;

- Free Range (including a premium free range category)
- Barn
- Cage

Free Range will mean:

That eggs are produced by hens that can, and do, move about freely on an open range on most ordinary days.

An 'ordinary day' is **every** day other than a day when on the open ranges weather conditions endanger the safety or health of the laying hens or predators are present or the laying hens are being medicated.

Premium Free Range will mean:

- a) free range eggs as defined at (1) in Box 6; and
- b) the maximum number of hens per hectare of outdoor space is 1,500 hens per hectare or less; and
- c) induced moulting is not employed; and
- d) beak trimming is employed only where ALL other methods of preventing feather pecking have failed (logically the better treatment of the hens should negate the requirement of this practice as the hens will not be over crowded).

**Further to this I expect that Free Range (not only premium free range) will also mean:**

That ALL free range hens have:

- Easy access to the range
- Overhead cover to feel safe
- Shaded areas to protect them from the sun
- Palatable vegetation for foraging
- Space – no more than 1500 birds per hectare
- Be secured at night
- Be protected from inclement weather and predators.

The conditions inside the shed or barn need to provide:

- Nests for egg laying (no cages)
- Perches for roosting adequate for the number of hens utilising the structure
- Objects for pecking
- Space – max. 6 birds per m<sup>2</sup>

Other:

- the ability to forage, dust bathe and scratch (through the provision of dry and friable litter inside the shed or by providing access to the outdoors)

**Addressing the focus questions raised in relation to Option 3**

33. My expectation as a consumer is that **Barn** hens will still be housed in the same conditions as a **Free Range** hen and that the variable between the two categories is the accessibility to the range. Namely the conditions inside the shed or barn need to provide:

- Nests for egg laying (no cages)
- Perches for roosting adequate for the number of hens utilising the structure
- Objects for pecking
- Space – max. 6 birds per m<sup>2</sup>

34. The information standard **should** be more prescriptive regarding the format, size and placement of the required information message. The required information should be included on both the top and side of the carton and lettering should be at least 6mm in height in a standardised font.

35. The scope of the proposed standard should be broadened to all other markets that retail eggs including:

- wholesale eggs
- farm-gate sales
- cafés / restaurants

In addition to this the standard should extend to manufactured products that choose to label or commercially promote free range eggs as an ingredient. The products should be made from 100% free range eggs as per the new information standard (I'm looking at you, mayonnaise.)

Finally, I do not support the use of caged production systems that prevent hens being able to express their natural behaviour. I do support the requirement to label these products as such so I can make an informed choice to purchase eggs produced in a cage-free system.

Kind regards,

Rebekka Rechten