



## Shane Rattenbury MLA

MINISTER FOR TERRITORY AND MUNICIPAL SERVICES

MINISTER FOR JUSTICE

MINISTER FOR SPORT AND RECREATION

MINISTER ASSISTING THE CHIEF MINISTER ON TRANSPORT REFORM

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ACT GREENS MEMBER FOR MOLONGLO

Free Range Egg Labelling Consultation Paper  
Small Business, Competition and Consumer Policy Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600  
Via email: [AustralianConsumerLaw@treasury.gov.au](mailto:AustralianConsumerLaw@treasury.gov.au)

### **Submission to consultation on Free Range Egg Labelling**

Thank you for the opportunity to provide feedback on the proposal to introduce nationally consistent egg labelling standards. I note the difficulties presented by the variations in free-range egg standards in particular, noting that egg production is currently only controlled at a national level by a range of industry bodies which set non-mandatory certification standards.

To alleviate this problem for consumers in the ACT, the ACT Legislative Assembly passed legislation in 2010 requiring supermarkets to clearly identify the production method for eggs, including whether they are produced in cage, free-range or barn facilities. The definitions for these production methods are underpinned by the national *Model Code of Practice for the Welfare of Animals: Domestic Poultry*.

This code of practice prescribes a maximum stocking density of 1500 birds per hectare for a facility to be considered 'free-range'. This code is mandatory in the ACT, and is found as a legislative instrument in both the *Animal Welfare Act 1992* and the *Egg (Labelling and Sales) Act 2011*. A stocking density of 1500 birds per hectare provides sufficient space for the hens to roam in paddocks with open access to sunlight and air. I am concerned that with no enforceable national standards, the stocking density of eggs produced in other jurisdictions can sit at 10,000 birds per hectare and still be labelled as 'free-range'. Stocking densities of 10,000 birds per hectare are clearly contrary to consumer expectations of the label 'free range'.

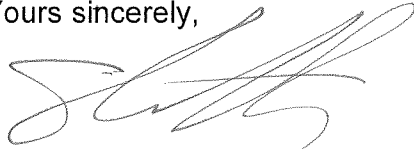
Nationalising standards similar to those currently in place by the ACT would allow all Australian consumers to make informed decisions based on the actual living conditions of hens in these facilities. There also seems to be a consensus that the

egg industry would benefit from the certainty afforded by nationally harmonised standards.

The ACT Government believes that both consumers and retailers should be supported to make informed and confident decisions that eggs labelled as "free-range" have been sourced from facilities where hens are treated humanely. The onus cannot and should not be put on retailers to check each farm to determine whether they will be illegally displaying eggs in the wrong categories.

In my capacity as Minister for Justice and also with responsibility for Primary Industries, I believe that developing national mandatory egg labelling standards similar to existing ACT standards would significantly benefit both the community and the egg industry through increased transparency and consumer confidence.

Yours sincerely,



Shane Rattenbury MLA

Minister for Justice  
Minister for Territory and Municipal Services (including Primary Industries)  
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cc. Simon Corbell MLA, ACT Attorney-General



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