Comments on Free Range Egg Labelling, Robert A. Swick, Industry Professor, Poultry Nutrition, School of Environmental and Rural Science, University of New England, Armidale, NSW.

Per Consultation Regulation Impact Statement

1. The question of egg labelling for free range, barn laid, cage and organic is based on the premise that there are quality differences in eggs from various production systems and that the type of production system enhances or degrades the life quality and welfare of hens that lay the eggs.

2. The advent of different classifications of commercial eggs has been in a large part driven by marketing programs of supermarket chains with little consultation with commercial egg producers or the scientific community.

3. Such marketing programs are driven by the thought that it is obvious a chicken would rather spend time outdoors in the sunshine scratching in the grass as opposed to living in confinement on a wire floor cage in an artificial environment. Attractive photos of hens on sunny, grassy fields entice the consumer to buy the eggs at prices higher than cage eggs. However assumptions of hen welfare should be based on scientific study and not marketing programs that can mislead consumers based on the innate tendency for humans to attribute human traits to animals.

4. The marketing programs discount the idea that the egg farmer knows what is best for the hen and that a healthy, happy, satisfied hen produces the most eggs at the lowest cost. Most large commercial producers have been successfully raising laying chickens for years and know what it takes to manage healthy hens. They follow science based improvements because science driven progress is proven.

5. Because of marketing plans of supermarket chains the egg producers have had to continue to invest large amounts of money to modify their production systems to satisfy the flavour of the month. Consumers have had to pay for these investments with increased egg prices. Much of this has occurred without hard scientific evidence of improved hen welfare.

6. Scientific evidence shows that hen welfare may be negatively impacted in free range systems. Hens by nature are omnivorous are susceptible to crop impaction when they consume too much lush tall grass. Hens that are forced outdoors become susceptible to internal and external parasites and viruses spread by wild birds such as avian influenza. Heat stress and limited access to water are other issues.

7. Free range stocking density is misleading with respect to hen welfare. More focus and scientific enquiry on welfare as related to feed and water access, shelter, freedom from predators and condition of the so-called range is required.

8. Poultry CRC Report 1.5.2 studied the frequency that individual birds with access to free range actually used the range. Birds were fitted with RFID devices to record how often they went outdoors. It was found that more than 10% of the birds did not use the range at any time. Those who did use the range spent an average of 4 visits each day on the range and each visit was on average 15 minutes in duration. Using a suite of behaviour tests, no consistent evidence of welfare differences between birds that used the range vs those that did not were found. The results implied that hen freedom to roam outdoors had no measurable benefit to welfare.

9. The Model Code of Practice for Domestic Poultry 4th Edition produced by the Agriculture and Resource management Council of Australia and New Zealand, 2002 states Free Range Egg Production Systems to be 2.1.2.3 Free-Range Systems (non-cage systems) "Birds in free-range systems are housed in sheds and have access to outdoor range". This further describes the conditions inside the shed including floor space, litter or slatted floor, perch space and nest boxes. The Free range management is described.

2.4.5.1 the outdoor range should be sited to avoid muddy or unsuitable conditions. If conditions develop an alternate area should be provided or remedial action taken to rectify the problem. The stocking density or rotational program for future flocks should be adjusted to avoid or prevent such situations.

2.4.5.2 Poultry should not be kept on land with poisonous plants, chemical, organisms that carry disease to an extent that could seriously prejudice the health of poultry.

(This use of the word "chemical" is misleading as everything including soil, vegetation, air, and water are "chemicals").

2.4.5.3 All birds when fully feathered must have access through opening during daylight hours for a minimum of 8 hours per day. The only exception is under adverse weather conditions or serious outbreaks of disease when birds may be kept inside. Openings should be of a size and number for birds and be evenly distributed to allow easy entry and exit for birds with no impediments. As a guide openings should be a minimum of 35 cm high and 40 cm wide with 2 meters per 1000 birds taking into account climatic conditions.

2.4.5.4 Birds on the range must have ready access to shaded areas and shelter from rain and windbreaks should be provided in exposed areas.

2.4.5.5. Every reasonable effort must be made to provide protection from predators at all times.

Space allowances: inside shed 30 kg/m squared

On free range: maximum 1500 birds per ha.

10. From item 9 it is clear that the definition of free range has been defined. The Egg Farmers of Australia have recently (June 10, 2015) defined a new definition of free range. The new definition is largely the same as the Model Code of Practice for Domestic Poultry 4th Edition.

In addition to the Model code the new definition adds some further refinements that are underlined:

Laying hens have access to and are free to roam and forage on an outdoor range area during daylight hours in a managed environment.

1. Hens should be provide shelter from inclement weather, protection from predators, be ventilated and have access to feed and water.

2. Hens should be provided with a minimum of 6 hours of darkness per night.

3. Eggs must not be labelled as free range until such time that the flock is provided with unrestricted daily access onto the outdoor range area.

4. Popholes should be provided extending along the length of the hen house equating to 2 meters per 1000 hens (min size 35 cm x 40 cm).

5. The range should provide vegetation, shelter, shade and reasonable protection from predators.

6. Access to outdoor range should be unrestricted and be for a minimum of 8 hours per day in summer and 6 hours per day during winter.

7. Outdoor stocking density must not exceed 1 hen per square meter. Where hens are stocked at higher than 1500 hens per hectare, close management must be undertaken and regular rotation of hens onto fresh range areas should occur with some continuing soil or fodder cover.

8. Stocking density inside the hen house up to a maximum of 30 kg per square meter of usable space.

11. As a scientist in the poultry industry for 33 years I can see no benefit to further altering the definition of free range, cage or barn laid eggs or spending money to enforce new regulations. Eggs from the various systems should be identity preserved if sold at a premium. A fourth classification of unclassified eggs should be implemented stating: “these eggs may be derived from cage, barn or free range systems”. This will ensure a market for excess production in any of the defined sectors. To force eggs to be sold as specified in Option 3 (box 6) as being one either as free range, barn or cage only is detrimental to the industry and pocketbooks of consumers.

12. The notion that hens with access to free range all go outside is false. This is the natural tendency of the hen and those that do not wish to go outdoors should not be forced to do so. The consumer needs to understand this. Statements as proposed in Option 2 “eggs can be labelled as free range if most birds move about freely on an open range on most ordinary days” is misleading.

13. The definition of free range as defined by the Model Code and further refined by EFA should remain until there is further scientific evidence suggesting they be changed.

14. Any proposed changes in the system of egg production in Australia that are not based on science, waste taxpayer money. If implemented, such changes would erode Australia’s food security and be of no benefit to hen welfare.

15. Based on the above, I recommend the status quo be maintained.