

Dear Sir/Madam,

Thank you for the opportunity to contribute to the Free Range Egg Labelling Consultation Paper.

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 practices.

Taking this into account, I believe that the following definition of 'free-range' (somewhat similar to Humane Choice True 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 grass range on most days. De-beaking is not permitted as a routine procedure."

Do take note that the open range should be covered with grass, suitable for grazing, and not dirt or gravel. Furthermore, information about pesticides being used would be appreciated.

Further comments on the consultation paper:

I support 'free-range' remaining a single, premium label, to avoid confusion and allow for the potential exploitation of consumers. However, if you do decide to have several labels... "Energy rating" for appliances is a good example of clear, concise and well-recognised label.

Farmers should be encouraged to provide specific details about chicken living conditions, not only to certification authority, but to consumer directly.

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, transparent accreditation of farms to ensure they adhere to agreed standards is critical to restoring consumer confidence. The third party could be a non-profit organisation and probably involve volunteers.

Thank you for your time.

Yours sincerely,

Oksana A. Tkachenko