

I would like to make a submission regarding egg labeling on Free Range Eggs. My voice is one of a consumer, mother and citizen - it represents my family's views (and reflects those of my community and other individual consumers).

The key issue for consumers is that a product should be labeled according to how it is produced. The rationale for a consumer to select free range eggs is simple. Consumers want to purchase eggs from poultry farmers who are treating hens humanely, with a life experience that does not involve suffering or discomfort. There can be no debate about what consumers are expecting when they purchase free range eggs – for there is only one reason for the selection of a more expensive egg – consumers want to make sure their purchase drives healthy humane farming practices. In this way, consumers are willing to pay more to allow the dynamics of a free market drive better treatment of chickens.

This means that the debate around labeling should be about what level is humane and keeps the chickens living healthy happy lives. As we already know that consumers want this by spending more on free range eggs. We need to ensure that labeling does not allow animals poorly treated to be labeled as free range – this is not what consumers want. If we decide that cost is too great and food too scarce to be humane to animals we can purchase cage eggs (which will have not free range label). That is our consumer choice and allows for the markets to decide at what price products should be charged at - and helps farmers invest in either intensive farming or sustainable farming practices.

We know that the objective of the Free Range labeling consultation is:

'to enhance consumer confidence and certainty regarding egg labeling, including to better ensure that consumers are not misled by egg labels'. As a consumer and mother looking after my family – I fully support this objective.

To fulfill the labeling message of 'free range' chickens must be free to move about without overcrowding – have access to the outside air and environment for a large part of the day - and have free movement. They should not require medical treatments or be euthanized due to overcrowding issues. Recommendations from groups that are interested in the welfare of the animal suggest that a ratio of 5 chickens per sqm as a maximum ratio and no more than 1000-1500 birds per hectare of outdoor paddock is appropriate – with no beak trimming¹. If we compare this with intensive egg production industry recommendations (who are most interested in maximising profit) we can see a great disparity. Australian Egg Corporation² guidelines are for 11-14 birds per sqm, with access to outdoors (but minimum of 5 openings just 25cmx40cm per 1000 birds) and no limits to bird stocking in outdoor paddocks - plus, there are no requirements for pasture. In contrast, labeling that is more welfare orientated insists on access to green pasture³.

A picture speaks a thousand words, so let us just compare visually what the 2 recommendations mean....

¹ Human Choice Free Range, Australian Certified Organic Free Range

² Australian Egg Corporation Free Range Assured.

³ Human Choice Free Range, Australian Certified Organic Free Range

1. What consumers see when they think Free Range:



Hens inside the shed at a low density free range farm



(source: <http://hsi.org.au/go/to/1860/free-range-egg-labelling-consumer-survey.html#.Vi61FbcrLRZ>)

2. What the Egg Corporation Guidelines mean

3.

Hens inside the barn at a supplier of supermarket own-brand free range eggs



10,000 hens per hectare



(source: <http://hsi.org.au/go/to/1860/free-range-egg-labelling-consumer-survey.html#.Vi61FbcrLRZ>)

The policy options available are that we maintain the current labeling, or move to information standards for eggs.

Given that Consumers are making a choice for free range and currently being misled by labeling – I believe the only way to move is to information standards that ensure FREE RANGE communicates what the consumer expectation is.

I do not wish to introduce labeling that waters down the definition of free range just so we can have producers able to put a label on their product that consumers are drawn to – without the label reflecting the actual production conditions.

So, please introduce labeling standards for Free Range. Please legislate the definition of Free Range. However, ensure they are at low stocking levels so the actual chicken is in fact able to Free Range. Deliver what the Consumer believes they are purchasing when they opt for Free Range (ie Figure 1) and not what the intensive farming industry want to sell under this label. This must include low stocking levels (5 per sqm) and outdoor roaming space (less than 1000 per hectare in outdoor paddocks) plus at least 20% pasture in outdoor paddocks. All hens should be able to *freely* access outdoor areas and not have to crowd through narrow openings. This is my expectation as a consumer of Free Range eggs.

A legislated definition of free-range eggs is required to ensure honesty in promotion to consumers as well as ensuring that the markets consumers wish to support (ie less intensive free range farmers) are allowed to flourish. Please end the unfair market conditions that impacts on genuine free-range farmers.

It is critical that the definition of ‘free-range’ includes specific conditions like stocking density and husbandry practices. It is important that the definition has bite –please ensure it is embedded with legislation. Guidelines have not worked in the past – nor have voluntary industry codes. Protect consumers and farmers.

I support the following definition:

“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.”

Do not confuse the issue by allowing varying degrees of free range – use a strong standard and a defined cut off – so consumers know that free range is what it says. Deceptive practices that been allowed to historically creep into labeling on eggs & Chicken should be discouraged by the new legislation

This will drive sustainable free range industry that delivers what consumers want, and be under no illusion - they want industry practices to change and not just be tinkered with. Much of the egg Industry wants to maximise profits and retain the status quo – while still enjoying a premium on free range egg prices. This is not appropriate – the premium is not there to allow tinkering but to encourage humane standards for the creatures we utilise in feeding our families. This premium should go to farmers who are improving farming practices and investing in a better more humane product that consumers want. Please ensure that Free Range labeling cannot be used to confuse and deceive consumers – as it currently does.

Yours Sincerely

Linda

Consumer

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