

December 7, 2016

To whom it may concern,

Re: Information Standard for Free Range Egg Labelling

Upon reading the proposed standard I am greatly concerned that it does not attend to the major concerns of the egg buying public regarding the provision of accurate and understandable labelling for the title "free-range", and leaves the industry free to abuse and mislead buyers – legally.

The public perception and expectation of "free-range" eggs is that the laying hen has regular and free access to outdoor (in the sun) foraging range with space to move. This would mean a maximum of 5000 hens per hectare. I do wonder if the authors of this proposed Standard have personally visited a site of 10,000 hens per hectare and considered this to be "free-range".

In addition, there are broad exceptions to the requirement to provide meaningful and regular access which are indefinably vague. Is this purposeful so as producers can skirt any public requirement of free-range?

The Australian public are over-whelmingly in favour of and calling for proper identification of free-range products and yet you, the public's employees, continue to produce vague and easily flaunted guidelines.

Clear requirements need to be produced so as:

- providing access to the outdoor range that is undeniable at all daylight hours is guaranteed
- flock sizes and densities are clear
- the quality of outdoor range and indoor structures are defined and enforceable
- the amount of outdoor time is clear and defined.

All of the above need to be clearly and simply defined and enforceable with the carrying of significant penalties.

Please stop mucking around the edges and produce the Standard that the public, your employer, actually wants and not some usual wishy-washy government paper than is useless to the actual cause.

Yours sincerely,

Mark Heydon