



Ref:

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Consumer Policy Unit

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SUBMISSION ON FREE RANGE EGG LABELLING INFORMATION STANDARD

The Department of Agriculture and Food, Western Australia (DAFWA) welcomes the opportunity to comment on the compliance and technical aspects of the draft Australian Consumer Law (Free Range Egg Labelling) Information Standard 2017 (the Standard) and associated Explanatory Statement.

This Standard has been developed to provide consumers with information to assist them make choices that align with their expectations of the various production systems in use across Australia for chicken egg production. The Standard also provides industry with clear guidance to meet consumer demands. The standard is not intended to address animal welfare issues associated with egg production and Western Australia (WA), is supportive of this approach as the welfare of laying hens is a complex matter and relies on good husbandry.

The definition of 'stocking density' in the Standard is somewhat ambiguous. Referring to the Explanatory Statement for a clearer definition provides some clarity, but there are quasi definitions throughout the document that tend to cloud the meaning. This may be overcome by presenting the definition of stocking density up front along with those respective outdoor areas of inclusion and exclusion, and doing the same in the explanatory statement.

DAFWA firmly believes that consumers have the right to be informed about the conditions under which their food has been produced and that industry will benefit from guidance on how to better meet consumer needs.

Yours sincerely

Mark Webb

A/DIRECTOR GENERAL