

### **Submission- Labelling Free Range.**

I have considered the reference documentation and believe that Option 3 (of the options) is the best option to provide clarity to consumers and the general public and is fair to producers large and small. Since science clearly shows welfare is related to lower density stocking, the density information as hens/m<sup>2</sup> (or similar) must be provided as animal welfare is a legitimate comparison point along with food safety concerns related to intensive stocking.

Free range stocking densities should also be fairly comparable, using the calculation based on the equivalent if all hens were outdoor simultaneously, otherwise it is not possible to ethically and fairly compare measured densities. Free Range should only be for when hens are kept free from cages, and can move freely and participate in the usual "natural" expression of normal "hen" behaviours like cleaning, exploration, resting and feeding.

It is also unfair and misleading to claim a Free Range label if hens do not actually get an opportunity to leave their enclosures for the majority of daylight hours, e.g. at least 6 hours a day. Just having the potential access to the outdoors is effectively barn production and should be labelled accordingly.

Therefore a measurement of density must take into account the actuality of whether birds get to go outside, and not merely the potential or opportunity to do so.

Also, common practices relating to high density stocking should be incompatible with free range, so for example - a need to debeak hens demonstrates that the hens are in a high-density situation, and should not be able to be called "Free Range".