

**FREE RANGE EGG LABELLING
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SUBMISSION

I am a consumer and I care about hen welfare.

Increasingly consumers are concerned about hens being confined in cruel factory farms. Hens need to stretch their wings, scratch in the ground and have dust baths and exhibit their normal behaviour.

Hens in sheds or barns need to have nests for egg laying, perches for roosting and, most importantly, there should be a maximum of 9 birds per square metre ie when the hens are inside.

However, there is much confusion over labelling. This is unfair to both consumers and genuine free range egg producers.

The label 'free range' or the proposed 'premium free range' does not give consumers certainty. Nor does the term 'free to range'.

To better inform consumers, labels should include the stocking densities of hens. If the words 'outdoor maximum 1500 hens per hectare' are on the carton, the consumer can be confident about the product. If they see next to that carton a label that says 'maximum 10,000 hens per hectare, they know straightaway that 1500 hens per hectare is far better for hen welfare.

Those free range producers with less than 1500 birds to the hectare can label their eggs accordingly. The term 'free range' should only ever appear on an egg carton if it has the stocking density and hen welfare details as well.

Egg producers can include additional information on the labelling about protection from predators and shelter in hot/cold weather.

Everyone selling eggs should be made to comply with stocking density labelling – including those who sell eggs at farmers markets and at the farm gate.

How do patrons in restaurants know the eggs they eat in various dishes are genuinely 'free range', even though that is what the menu claims so often these days? Perhaps restaurants should be included in the standard.

Consumers would benefit also if these standards were to apply to eggs used in the processed foods we buy in supermarkets, bakeries and eggs used by the catering industry.

Option 3

My preference is for option 3.

The 'Free Range' label should apply to eggs from hens who are able to move about freely on an open range on most ordinary days. The stocking density listed on the label should be 1500 birds per hectare (or fewer). (The indoor stocking density should be a maximum of 9 hens per square metre).

For clarity, I prefer two descriptive labels for 'barn':

(a) 'Barn' for those that do not allow hens freedom to range outside. (With a maximum of 9 birds per square metre)

(b) 'Barn - freedom to range outside' (With indoor stocking density of a maximum of 9 hens per square metre. There should be a maximum stocking density of 10,000 hens per hectare.)

Option 3b is confusing. Therefore I suggest the label should be 'free to range outside'.

'Defence' Provision

I do not support the Option 2a 'defence' provision as I do not think it is necessary. Genuine free range producers would be aware of what is required through the descriptions in the standard.

I ask that you seriously consider my contribution to the development of a national information standard for the labelling of free range eggs.

Charles Davis