

EARLY LEARNING AND LONG DAY CARE CENTRE 61 Moore Park Road Paddington 2021 Tel 9361 4369

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PARKES ACT 2600 By Email: <u>AustralianConsumerLaw@treasury.gov.au</u>

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SUBMISSION - FREE RANGE EGG LABELLING

I am the proprietor, and delegate of the Approved Provider, of Gumnut Gardens Long Day Care and Early Learning Centre. Food and sustainability are key factors in our philosophy. We have spent much time sourcing meat from providores with a "paddock to plate" philosophy and obtaining organic produce wherever possible, but we feel that staff and children are very badly let down when it comes to assurances regarding free-range eggs. I am also a parent and consumer of eggs myself.

I would like to make the following submissions:-

- 1. It is misleading to call free range eggs "free range" unless a standard is developed that allows consumers to assess whether the number of hens per hectare equate to free range poultry. Obviously to pack a paddock with so many hens that the birds can't move does not equate to "free range". It is important to label egg cartons with the ratio of hens per hectare and how that ratio matches the Free Range Egg Model Code.
- 2. Consumers are interested in "free range" and it is difficult to obtain appropriate information. We should not have to go to sources such as Choice Magazine for information.
- 3. It is important for the consumer to know whether a producer of free range eggs also produces cage eggs. Consumers purchasing free range eggs do so out of concern for the well-being of the birds they do not want to support producers who demonstrate such callousness to poultry that they would produce eggs from caged birds. It is important that labelling extend to include any affiliation with a producer of caged eggs to avoid the producer operating caged egg production under a different entity.
- 4. It is unfair to consumers to pay a premium for free range eggs if they are not truly free range.
- 5. It is unfair to decent and honest free range farmers to have to compete with producers who are misleading in their claims. It is obviously more expensive to produce eggs in a true "free-range" environment.
- 6. In many cultures the egg is symbolic in terms of regeneration, the cycle of life and the start of harvest. One needs look no further than the Easter egg to for such an example. In short, the egg is a symbol of hope. It is an unacceptable paradox that such a symbol of hope is produced through cruelty.
- 7. Educators of the young aim to embed sustainable and environmentally appropriate practices in children. It is difficult to do this with integrity if the educators themselves are uncertain as to the source of produce. It is hypocritical of the wider community to embrace sustainability while consuming eggs that are from hens that are not truly free range.

In summary I submit that the following labelling is appropriate:-

- 1. The density of hens per hectare;
- 2. How that density matches the free range egg model code; and
- 3. Whether the producer, or its affiliate, also produces and sells caged eggs.

Yours faithfully,

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