

The Manager  
Consumer Policy Unit  
Small Business, Competition and Consumer Policy Division  
The Treasury  
By email [AustralianConsumerLaw@treasury.gov.au](mailto:AustralianConsumerLaw@treasury.gov.au)

2<sup>nd</sup> November 2015

**Re: Free Range Egg labelling**

Dear sir/madam,

Please accept my submission regarding free range egg labelling. I write as a consumer, voter, tax payer and father. I'm not a vested interest and do not work in the industry or I do not have anything to do with the industry. My only involvement in the industry is as a consumer.

**I totally support the introduction of a standard and strong standard across all of Australia. But we need a standard that is policed as rules/regulation/standards are only as good as the policing of these standards.**

At the moment, I truly believe there is no consumer certainty around free range eggs and I think this is damaging the industry and good producers and is nothing short of misleading and deceptive.

When we buy eggs there are so many different types of eggs and labels and we don't know which is best.

**Cost is not our driver, happy chickens are our only driver but at the moment egg packaging is totally confusing and is a total and utter disgrace.**

**Clearly marked boxes with hen Destiny and standard identification labelling:**

I think there should be a standard form of label of identification so all eggs can be easily identified and have a simple labelling system so you can work out what type of eggs you want, quickly. This standard label should include hen destiny or even better have an set industry standard like if over 1500 hens per hectare then you can't use the word 'free range'. That would lead to simple packaging.

Also, I would like you to consider maybe egg producers can't produce free range and caged so you can't get the possible situation of caged eggs being sold as free range as that is total and utterly appalling and I would be really angry and upset if I was buying free range eggs that are caged.

### **World's best practice**

What do they do around the world? Maybe we can find the best system and introduce that into Australia, job done.

### **Formal timeframes for the industry to fix its problems or formal regulation of the industry:**

I know it is a dirty word for the government but formal regulation of the industry must be considered. I would even be happy if the government said to the industry you can continue to self-regulate but if the industry does not fix up its problems then the government will regulate you in 2, 3 or 5 years, no if's and no but's.

Even now I would like to see some sort of independent audit system introduced even if by the industry at the moment.

Then if the industry can't or will not fix its problems then regulate the industry and I'm talking about regulation including regular unannounced visits/audits to producers where assessors walk into farms and count chickens. Then if producers are not following the rules/regulations then there should be high fines and possible jail terms.

As a consumer and taxpayer, I would be happy to pay extra for this regulation if it leads to good outcomes for chickens and consumers.

### **Misleading and deceptive behaviour**

I think it is nothing but fraud and misleading and deceptive to high density produced eggs as free range and it is offensive and there needs to be massive fines, losing the right to use terms like 'free range' and the risk of imprisonment if this happens.

### **Strong deterrents must be put in place**

Also, I have to question the role of the Australian Egg Corporation Limited that have let 20,000 hens per hectare be called free range and even worse let caged eggs be sold as free range.

If other industries/individuals did that they would be charged with deceptive behaviour and jailed but it has been allowed to happen for years in the egg industry and it seems to be acceptable. Now is the time to say no more this must stop, NOW.

Maybe the Australian Egg Corporation Limited that is controlled by egg producers can't control its industry as there are too many vested interests controlled the Corporation?

I look forward to clear identification and tight regulation of producers.

ENOUGH IS ENOUGH.

Yours sincerely,

Stephen Koci  
Croydon Vic 3136  
Email: [Stephen.koci@gmail.com](mailto:Stephen.koci@gmail.com)