

31 October 2015

Manager  
Consumer Policy Unit  
Small Business, Competition and Consumer Policy Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Dear Treasury

**Re: Free range egg labelling consultation**

We appreciate the opportunity to provide the following comments to Treasury on free range egg labelling.

We own and operate a small free range egg farm in Old Junee NSW. Our property is 1.64 hectares and we produce 100 dozen eggs per week. Our hens are secured in a shed only at night, and have complete use of the property from dawn till dusk seven days per week. Being small producers, we know what all of our hens are up to and can guarantee each of them is outside every day.

In the current market that has no egg standards, there is far too much competition for genuine free range eggs, and many sales are lost on price. Sales are made by clever marketing, buzz words, 'live' chook cams and happy chooks on cartons – the production system of the eggs can be far from the lovely image portrayed on packaging.

We support the definition of Option 3a. We think all systems require a standard (free range, barn and caged) and strongly support the inclusion of the premium free range egg category. This definition will ensure our production system and product will get the recognition and price that is deserved.

Consumers will have confidence in what they're purchasing as their expectations will align with the production method and associated price.

As small producers, the cost for us to comply with this definition would be negligible. In fact, we expect the benefits to far outweigh any costs. Any cost incurred would result from minor labelling changes which would cost no more than \$100.

**We would also like to address some of the questions in the consultation paper:**

The definition of 'most hens go outside on most ordinary days' creates great ambiguity and therefore significant potential for exploitation. We believe it would not increase the consumers' ability or confidence in identifying which free range eggs align with their values and expectations.

The disclosure of stocking density is a weak unit of measure for distinguishing between different animal husbandry practices. It is open to exploitation (ie: property is 1000 hectares but hens only have access to 50 hectares) and doesn't account for seasonal changes. (ie: pasture availability, protection from elements). Stocking density is a basic tool for comparison, however, it is one element which should be disclosed in order to provide general production system information.

We think a premium animal welfare category would benefit consumers enormously - if it is regulated. The impact to our business would be positive – our practices wouldn't change, but consumers would be confident in their purchase.

We support the proposal for the premium free range definition to be called 'premium free range'. We feel it is the best descriptor for this production system and would align with consumers' values and expectations.

The 'access to range' category does not accurately reflect the 'grey area' between free range and barn eggs. We suggest replacing 'access to range' with the term 'restricted range' in order to greater clarify production methods and meet consumer expectations.

The cost to our business to change our labels to 'premium free range' would be negligible – \$100 at most.

We greatly appreciate the opportunity to provide our input to the free range egg consultation paper. We are passionate about this topic and look forward to the outcome.

Yours sincerely,

Bryson and Anna Lashbrook