

**Attention: Free Range Labelling Consultation process**

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Dear Sir/Madam,

***I welcome the opportunity as a citizen in what remains of democracy to contribute to the Free Range Egg Labelling Consultation Paper.***

***My comment about democracy is not flippant.***

*BIG FARM interests in the chicken farming industry are as ruthless as BIG PHARMA in the agricultural and medical-pharmaceutical industry. Too often their commercial and staffed voice, their lobbying organisations, and their donations to political interests appear to have VOTES which are not given them in our Australian constitution which provides one PERSON one vote – NOT one corporation 1,000 voices.*

***Back to the central topic: the legislated definition of free-range eggs.***

***A “reasonable” legally enforceable definition of “free range eggs” is critical for three reasons:***

- 1. for ending the present exploitation of consumers, by what becomes dishonest and unreasonable labelling as “free range”.*
- 2. for reducing additional cruelty to animals - when even the free-range husbandry of hens which consumers support by higher prices is secretly stolen away, and*
- 3. for correcting the unfair dishonest market that confronts genuine honest caring farmers who produce genuine free-range farm eggs.*

*In order to meet consumer expectations of animal welfare, it is essential that the definition of ‘free-range’ includes specific conditions like stocking density and husbandry practices.*

***Taking this into account, I believe that the following three-part definition of ‘free-range’ should be legislated:***

- Free-range production systems must have a maximum stocking of 1,500 per hectare, as outlined in the Model Code of Practice.*
- Free range must guarantee that hens can, and do, move about freely on an open range on most days.*
- Free range labels must also require NO de-beaking – which is contrary to natural feeding.*

***Four further comments on the consultation paper findings:***

- The ‘free-range’ label remaining a single, unambiguous premium label.*
- New “sneaky” labels like “premium free-range” and “access to range” as these are deliberately designed to mislead and to cause further confusion. Such confusion is an opening for further exploitation of consumers and genuine “free range” egg farmers..*
- Production systems that stock hens intensively at anything over 1,500 hens per hectare should be banned from using the words ‘free-range’ anywhere on their labelling of product. Any production system with over 1,500 hens per hectare may describe its conditions on the product labelling, but with no mention or conjunction of the terms “free” and “range”..*
- Independent, third party accreditation of farms to ensure they adhere to agreed standards is critical to restoring consumer confidence.*

Thank you for consideration of my concerns

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