

To whom it may concern

Please find below my submission regards to your enquiry into 'Free Range Egg Labelling'. I have answered some of your questions from my perspective as a consumer and with the view that sometime in the near future I plan to commence my own small scale free- range egg production as part of a fully integrated regenerative farming operation (mobile chicken vans use to regenerate pasture shared with cattle and other live stock).

The problem

1. Do production system claims for eggs such as 'free range' sometimes mislead consumers? Is this the case for other claims, including 'barn' or 'cage' laid?

A: From the point of view of a consumer yes they do. Most of the people I know and have spoken to would expect that free range means the chickens are roaming outside on grass for most of the day. The truth appears far from that. Most people would picture a small group of chickens, not 10,000+ hens all crammed together. Everyone I know understands what a cage egg is (ie from a 'battery' hen) many people I know would be confused about Barn laid. My thoughts would be that 'fake free range' (as I call it), whereby large numbers (1000's of hens) are kept in a shed and a few manage to find a way out all day would be the same animal welfare outcome as barn laid.

2. If so, how much detriment have consumers suffered due to misleading production system claims for eggs?

A: The main detriment is when people choose a higher welfare option but in actual fact they being ripped off by not getting the welfare outcome for the chickens they are paying for. I got to the point I didn't know what I was buying any more so I got my own chickens.

3. What detriment have producers and retailers suffered due to misleading production system claims for eggs made by competitors?

A: The main impact is on the ethical producers- small scale production, where birds live the lives people imagine in their minds (paddocks, grass, friendly marenmma dogs guarding the chickens etc) as 'free range'. The large producers with the flocks in the 10,000's-100,000s set the benchmark price in the supermarket and other producers have to build their costs to meet consumer expectations around that price point. It's an unfair playing field with the term 'free range'. Smaller producers then may have to get other independent ethical certification- this is expensive on top of everything else so adds to the cost for consumers. If there was clearer labelling for all – that would be a better outcome.

Amongst consumers who care about issues like animal welfare- backyard chicken production is currently booming so it's worth considering the implications of this. Health and biosecurity would be a problem if bird flu entered the suburbs. People also love the idea of backyard eggs and the government will have little control over the standards and health implications of these getting out into the community. From my experience a lot of this popular chook keeping amongst the middle/ upper socio economic groups is driven by people feeling ripped off and lied to by the big supermarkets and producers. There is a segment of people who want transparency about where there food comes from and these people will opt out of the system if they don't trust the system. While this may benefit some smaller producers who can develop personal relationships with their customers (via farmers markets etc) – it may disadvantage other mid-sized players who provide higher welfare options than your big suppliers to the supermarkets but are trying to develop commercial models at scale- thus you end up with no middle ground.

4. Do producers face significant uncertainty about how to ensure they do not make misleading production system claims for eggs?

A: No in my mind it's currently a free for all for producers to do and say what they want. I wouldn't even trust that a so called 'free range egg' from one of the larger commercial producers even came from any kind of hen that wasn't in a cage.

The policy response

5. An information standard for eggs labelled 'free range' could mandate that the eggs come from flocks in which *most hens go outside on most ordinary days*. Would this reduce the problem?

A: no- this still seems vague and evasive to me. I think it needs more of a checklist that includes stocking densities etc as well as the above – wouldn't you just say most hens go outside most days- (what's most anyway??). In my experience ALL hens will go outside everyday if they can and there is a reason for them to do so.

I am also opposed to the idea of having a separate category called "Premium" to me this makes it seem like the eggs are elite and not for the average person. The focus to me is that the eggs are somehow better/tastier etc which could be again misleading. The focus should be highlighting the welfare/ conditions available to the hen. I think it would be better to have something along the lines "Highest welfare" or "open range free range".

Using a term to differentiate the eggs is useful- particularly when you are buying products made from free range eggs (eg. at a café) at that point you don't have the information on the packet available to you- but if there were different kinds of eggs- that could be stated on the menu eg. "high welfare free range" or whatever.

In addition to that as much information about the way the hens were raised (stocking density etc) should be on the packet. People won't go to a website to find out more (some companies already provide this but the average consumer wants to make a simple choice at the point of sale).