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2 December 2016

Consumer Policy Unit
The Treasury
Langton Crescent
PARKES ACT 2600

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Commercial Egg Farmers of South Australia and Tasmania (CEFASAT) welcomes the government's continued consultation of the free range labelling issue.

Our organisation represents over 80% of commercial egg production in South Australia and Tasmania and our members operate to the highest industry standards.

In response to the Information standard 2017 issued by Minister for Small Business, CEFASAT members wish to voice concerns with regards to what we feel is a change of direction to the original decision made by CAF Ministers in March 2016.

Our members first reference point of concern is in Part 2, Section 7 (2) (b). We feel this does not reflect the intent of the agreement of CAF Ministers. This has raised concerns and placed farmers in a position of further ongoing uncertainty. This has substantial effect on the ongoing investment required to provide future sustainability of genuine and affordable product to consumers and has the potential to inhibit industry growth.

As part of a positive contribution to the discussion, we would suggest the following amendments to the definition:

1. define an *outdoor range* as the free range area as prescribed in the current Model Code of Practice for the Welfare of Animals: Domestic Poultry (4th Edition)
2. define *stocking density* as the maximum amount of space for each hen available for each hen during the laying cycle.

In addition, as the explanatory statement elaborates on the implications of Part 2 Section 7 (2) (b), there are concerns regarding several components that are inconsistent with the understanding of the original intent of the decision.

Our members are concerned that these issues include commentary which goes beyond the access based provision provided through the CAF decision.

Our understanding is that the definition is access based so that producers are not required to ensure that hens go outside during daylight hours every day across the laying cycle.

We are required to provide access to the range which is both meaningful and regular. This is our understanding of the original intent of the CAF decision however commentary presented in the explanatory notes in reference to 7(2)(b) creates further obligations on the farmer which are essentially trying to impose a "how to farm" legislation through consumer law.

We request that due consideration is given to our concerns as egg farmers and that a 'true understanding' of farming practices forms the basis of any Government decisions. Please feel free to contact me should you require further clarification

Yours faithfully
Dion Andary
(President CEFASAT)