

8 December 2016

Submission to Treasury

Re: Free Range Egg Labelling Information Standard

Dear Treasury

I applaud your actions in attempting to clarify the confusion and misinformation surrounding the 'Free Range' labelling of eggs.

However, on reading your draft information, it would seem that your proposed standards actually do very little to address the confusion and lack of trust consumers have regarding the term, and further, and perhaps more to the point, will not have the positive impact on a hen's life that the consumers are expecting and demanding.

As it stands, the wording of the proposed standards is very loose, and provides 5 broad exceptions to the requirement for the essential aspect of birds being able to access the outdoors. There is also no clear guidance as to what 'meaningful access' actually means in practical terms.

All of this will make the standards extremely difficult to enforce, and therefore do little to quell consumers' concerns and lack of trust in the labelling.

I am also concerned that the 10,000 birds per hectare is well above the recommendations of all animal welfare experts, including Australia's most trusted organisation, the RSPCA, so I am not convinced that this will provide the conditions for birds that consumers are expecting.

Australians are demanding better labelling and better treatment of farm animals. 70% of Australians are particularly concerned about layer hens in cages, so it is important that we address these concerns in an effective manner.

To that end, I implore you to revise the standards and provide consumers with certainty by:

- Tightening the exceptions for providing access to the outdoor range so that access cannot be denied on a routine basis;
- Including a requirement that regulators consider the following in determining what "meaningful and regular access" means:
 - Flock size and stocking densities inside the barn;
 - Size of openings relative to the number of hens;
 - Placement of physical structures and architecture inside the barn;
 - The condition of the outdoor range including providing adequate shelter, foliage and vegetation; and
 - The extent to which hens actually access the range.

This is a very important issue to Australian consumers and once more I commend you on undertaking this review. This is our chance to set meaningful standards and meet consumer expectations around the labelling requirements for 'Free Range' Eggs, so we must do everything we can to bring about the outcome of better welfare for these farm animals that consumers are demanding.

Regards

Brian Daly