



DAYS EGGS PTY LTD

SUBMISSION FROM

**DAYS EGGS PTY LTD IN RESPONSE TO THE AUSTRALIAN CONSUMER LAW (FREE RANGE EGG LABELLING)
INFORMATION STANDARD 2017**

02 December 2016

Consumer Policy Unit
The Treasury
Langton Crescent
PARKES ACT 2600

Email: australianconsumerlaw@treasury.gov.au

The Minister for Small Business is seeking comment on the draft national standard for free range egg labelling in line with the Information Standards 2017 consultation process

In particular, the Federal Government decision seeks comment on and should be limited to:

- A basic definition of 'free range' for labelling purposes of a maximum stocking density 10,000 hens per hectare
- The mandatory disclosure of specific information relating to outdoor stocking density to consumers disclosed on all free range egg packaging

Days Eggs Pty Ltd submission supports the proposed review by the Federal Government, in order to achieve a positive and transparent outcome for all stakeholders including Consumers, Egg Producers and Regulatory Authorities, however we express the following concerns i.e.

1. Such a review should not try to introduce "how to farm" legislation through Consumer Law
2. Most egg businesses in Australia operate to the highest ethical and industry standards and are being subjected to 'post truths' regarding farming systems
3. The review and any subsequent decision, needs to deliver transparent, explicable, better and more meaningful consumer information
4. Eliminate confusion, enable informed choice and uphold animal welfare and humane production objectives.

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5. It is vitally important that recognition is given by all involved, of the natural extreme diversity in production systems and this provides diversity to the consumer added value in the free range category.
6. There must be an understanding that the free range egg industry extends from basic small tin sheds in paddocks, mobile caravans, hand collection and rustic images of old farm barns to the latest innovative technology providing high efficiency and automation with hens still free to roam yet all legitimately operate in the “free range” category.
7. Modern systems are based on the highest standards of hen welfare and food safety, food security and environmental sustainability and are now an enforcement standard in most retail Quality Assurance requirements.
8. The recent rapid growth in market demand is being met by the egg industry presently and into the future, and that any information has its basis in science and realistic farming practices.

Any decision should also recognise the substantial \$10's of Millions re-investment recently committed to by egg producers in Australia, in order to modernise the free range industry and sustainably meet the rapidly growing affordable free range egg demand. A decision must guarantee that egg producers are not dis-enfranchised as a result of poor decisions based on a few rouge farmers in the past, market interference, distortion, fundamental ideology or misinformed perception

Labelling should address the concerns around consumer confusion. Labelling regulation must also recognise that free range is a description of production method and not a brand that can be owned by a particular sector of the industry. The Egg Industry supports the umbrella description of 'Free Range' in line with the 2 following descriptions.

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 response to growing uncertainty over the future of caged egg production - evidenced by moves to restrict further development of cages in ACT and Tasmania - the industry has responded positively to shift its focus to invest in modernised free range production systems to provide consumers with a sustainable supply base.

The question that many in the industry are beginning to ask is this: *“Can a viable modernised industry survive and invest with confidence without certainty within the production sector?”*

Please contact the writer should you require clarification or further information

Yours faithfully



Dion Andary
Managing Director