

Thank you for releasing the draft Information Standard for Free Range Egg Labelling for public comment.

Unfortunately, I am very concerned about its contents.

Free range eggs are vaguely defined as “eggs laid by hens who have meaningful and regular access to an outdoor range.”

The proposed Information Standard also lists five broad exceptions to the requirement to provide meaningful and regular access, without providing any real guidance as to what this access actually entails.

Stocking densities of up to 10,000 birds per hectare are allowed. This is too high. The RSPCA’s submission in April this year recommended the outdoor stocking density for free-range hens be 1,500 birds per hectare or up to 2,500 if birds are regularly rotated onto different outdoor range areas. The decision to allow a maximum of 10,000 birds per hectare is much higher than the recommendation to ensure good welfare, which is very disappointing.

Not only will the proposed Information Standard be extremely difficult to enforce, it will also fail to provide consumers with any certainty that the free range eggs they’re buying have actually come from hens with access to a quality outdoor range.

The Information Standard needs to 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.

Thank you.