



14 December 2016

The Treasury
Langton Crescent
Parkes ACT 2600

To whom it may concern,

RE: Free Range Egg Labelling Information Standard

The NSW Farmers Association Egg Section Committee appreciates the opportunity to comment on the exposure draft and explanatory statement of the Australian Consumer Law (Free Range Egg Labelling) Information Standard 2017.

NSW Farmers Association is a member of Egg Farmers Australia (EFA), the peak industry body for egg farmers across Australia. We support the EFA submission and reiterate the concerns raised regarding elements of the information standard and the explanatory statement. The purpose of the information standard was to provide certainty to consumers and producers, and amendments should be made to the exposure draft to ensure this outcome is achieved.

The key issues raised by EFA and supported by NSW Farmers are:

- Part 2 Section 7 (1)(a) does not reflect the full decision of the Legislative and Governance Forum on Consumer Affairs (CAF) on 31 March 2016.
- Part 2 Section 7(2)(b). This point contradicts the definition in Part 2 Section 7 (1), inserting a subjective element into a standard that is supposed to deliver certainty to consumers and producers.
- The definitions of *outdoor range* and *stocking density* should be amended.
- Specific information is needed on the requirement to declare stocking density

In order for the egg industry to meet consumer demand for free range eggs, producers need absolute clarity about the free range egg information standard. With this clarity will come growth and investment in the sector for the benefit of farmers and consumers.

The NSW Farmers Association Egg Section Committee would like to thank the government for its ongoing engagement and consultation on this important issue, and look forward to working to implement the finalised information standard.

Kind regards,

A handwritten signature in black ink, appearing to read 'Bede Burke'.

Bede Burke
Chair
NSW Farmers Association Egg Section Committee

NSW Farmers' Association

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