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Free Range Egg Labelling Information Standard

Thank you for the opportunity to comment on the exposure draft of the Free Range Egg Labelling Information Standard.

In March this year, I expressed the position, on behalf of the ACT, that although I supported the move to a national information standard on free range egg labelling, I did not support the options for this standard that were presented to CAF. I also did not support the standard that was eventually endorsed by other State and Territory Ministers, which permitted a stocking density of 10,000 birds per hectare.

My position remains that the term “free range” should only apply to practices that use an outdoor stocking density of 1,500 birds per hectare or less. I also reiterate that consumers have high expectations of egg products labelled “free range” and expect animals to be treated appropriately and humanely. The welfare requirements for eggs labelled “free range” need to reflect this.

I accept that Ministers supported a different standard and I now wish to provide some comments on how I think the detail of this standard could be improved.

I am chiefly concerned that the definition of ‘free range’ in the draft standard is inadequate in that it does not ensure sufficient welfare for birds, and does not accord with consumers’ general expectation of “free range” welfare standards.

The concerns I have include:

- The ‘free range’ definition should ensure that birds have appropriate facilities when they are inside; for example the standard could define indoor requirements such as the architecture of the accommodation and the indoor stocking density. The standard could also include requirements as to how ‘access’ is provided, noting that in high population facilities it can be hard for birds to access the outdoors because of the size and type of opening provided.
- There is insufficient clarity around “meaningful and regular” access (to outdoors), and very broad exemptions to this (in subsection 7(2)), which may mean that birds do not have the genuine opportunity to roam outdoors to the level that consumers expect. An example of the problematic

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drafting is subsection 7(2)(a)(v), which provides a catch-all exemption (“exceptional circumstances”) to providing regular and meaningful access.

- Further detail could be provided to ensure the outdoor range is appropriate, for example, that it provides shelter, and all of the space claimed to count for the “10,000 per hectare” equation is suitable for foraging.

I also support a proposal, which some stakeholders have suggested, that the “per hectare” figure be expressed on the label as part of a scale. This is a good way to give context to consumers who will not necessarily understand the relevance of an abstract stocking density number.

I understand that major stakeholders have expressed similar concerns with the proposed information standard, including the RSPCA, Choice, and Voiceless. I hope that these concerns are taken into account and result in changes to improve the standard.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shane Rattenbury', written in a cursive style.

Shane Rattenbury MLA

ACT Minister for Justice and Consumer Affairs

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