

I am writing to address the draft of the Information Standard for Free Range Egg Labelling for public comment. In this document free range eggs have been vaguely defined as “eggs laid by hens who have meaningful and regular access to an outdoor range.” However, I believe that this will be extremely difficult to enforce as no real guidance has been provided for what this access actually entails.

I ask that the Information Standard provides 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.