

Consultation Regulation Impact Statement

Free range egg labelling

Submission from the Australian Veterinary Association Ltd



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The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Introduction

Thank you for the opportunity to provide comment on the Australian Government's egg labelling consultation paper.

It is noted that the policy objective of this consultation process is to provide increased consumer certainty, not to prescribe production practices or regulate animal welfare. While egg labelling is a marketing issue, it is one based on the animal welfare concerns of consumers, and so it is the AVA's position that the two issues are inextricably linked. It is therefore important that any definition of free range or associated labelling will accurately convey the conditions under which layer hens are being farmed.

Free range standards and community expectations

To achieve the desired objective of "most hens going outside on most ordinary days" requires consideration of a range of inputs. In the past, arguments have focused mainly on the stocking density of the outdoor range area, and whilst this is important, it is only one of a number of criteria which must be met to achieve this objective. Other critical factors include:

- Number and size of popholes, and ease of access to these from within the shed
- Height above ground of popholes, and nature of the ramp or exit area
- Duration of time that popholes are opened each day
- Conditions outside the shed and whether these are conducive to dispersal of hens
- Provision of shelter and hedges or wall-like structures to encourage birds to disperse
- Conditions of the range including whether the ground is muddy or dry, or covered with vegetation
- Provision of overhead protection to encourage birds to venture over the range area
- Stocking density within the barn as well as in the outdoor area.

In terms of the health and welfare of the hens, free range egg farming can be done very well, or very poorly, depending on how the above production inputs are implemented. Further, it is essential that appropriate preventative health and management procedures are in place to address the increased disease risks associated with free range production. As a result it is important that these criteria are part of any labelling standards, so that consumers who are making the choice in the expectation of improved welfare, are not being misled.

The *Model Code of Practice for the Welfare of Animals – Domestic Poultry 4th Edition* (the Model Code) is currently being reviewed, and it is likely this process will result in the setting of science-based animal welfare standards for free range and other types of layer hen production. Decisions about labelling would more appropriately be delayed until after the review is completed, so that they can be informed by the outcomes of the review.

Comments on consultation options

Option 2(a) includes a list of conditions that may be suitable as a defence provision (Box 4, pages 20 and 21) and which are likely to achieve the objective of "most hens going outside on most ordinary days". It is suggested that these sorts of conditions would be better adopted as compulsory standards which must be met to achieve free range status for labelling purposes, rather than providing them as optional conditions for a defence provision. The decision

on which conditions are appropriate to adopt as standards, should be made on scientific grounds as part of the review of the Model Code.

Option 2(b) is too heavily focused on stocking density disclosure and does not provide assurance that the other important management criteria (listed above) will be met.

Option 3(a) considers stocking density, beak trimming and forced mounting as criteria, but again, the range of factors discussed above need to be included to ensure birds will actually make good use of the range, and that they will have good health and welfare.

Option 3(b) is of concern, as “access to range” is a theoretical requirement without any defining criteria. This leaves the way open to call eggs “free range” but provide only tiny shed openings for very short periods so that in effect, most birds can never find their way to the outside area. The label option proposed under 3(b) will only encourage this sort of deception, while offering no tangible benefit to the birds over a barn production system.

In summary, consumers choose free range eggs largely because they believe the hens have better welfare under these conditions. The welfare benefits associated with free range farming can only be assured when a number of important management criteria are met. These criteria ensure the hens can (a) truly access the outdoor area when they want to, and (b) derive actual benefit through exercising this choice. Labelling standards that only stipulate access to the outdoors will mislead the public unless these standards also require that the range is suitable and hens are protected from predation and disease through proper management practices.

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