

# Submission to the Australian Competition and Consumer Commission

Australian Egg Corporation Limited
Certification Trade Mark Application
No. 1390450

- interested party consultation

3 July 2012

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# **About CHOICE**

CHOICE exists to unlock the power of consumers. Our vision is for Australians to be the most savvy and active consumers in the world.

As a social enterprise we do this by providing clear information, advice and support on consumer goods and services; by taking action with consumers against bad practice wherever it may exist; and by fearlessly speaking out to promote consumers' interests - ensuring the consumer voice is heard clearly, loudly and cogently in corporations and in governments.

To find out more about CHOICE's campaign work visit www.choice.com.au/campaigns and subscribe to CHOICE Campaigns Update at www.choice.com.au/ccu.



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# **Executive Summary:**

CHOICE asks the Australian Competition and Consumer Commission to reject the Australian Egg Corporation Limited's application to register the Egg Standards Australia/Australasia certification trade mark (CTM). The rules underpinning the CTM would introduce a maximum outdoor stocking density for free-range eggs equivalent to 20 000 birds per hectare which is thirteen times greater than the current definition in the Model Code of Practice for the Welfare of Animals: Domestic Poultry which sets a limit of 1500 birds per hectare. The Model Code limit is reflected in Queensland legislation and certification schemes already in the market and there is no independent research to justify the increase proposed in the CTM application.

There are three concerning implications of the ACCC approving the CTM which arise because the proposed stocking density standard is substantially inconsistent with accepted standards. Firstly, consumers may be misled by misrepresentations that products carrying the CTM meet accepted standards. Secondly, competition issues may arise if companies that respect the current limit of 1500 birds per hectare find it difficult to compete with companies using higher stocking densities permitted by the CTM rules. Finally, public detriment may be generated by the erosion of consumer confidence in free-range egg labelling.

CHOICE therefore recommends that the ACCC reject the proposed CTM in the interest of protecting consumers, promoting competition and preventing public detriment.



### 1. INTRODUCTION

CHOICE appreciates the opportunity to provide the following comments to the Australian Competition and Consumer Commission (ACCC) on the Australian Egg Corporation Limited's (AECL) application to register the Egg Standards Australia/Australasia certification trade mark (Application No. 1390450) (CTM).

CHOICE's interest in the CTM application is based on the fundamental consumer right to be informed. This requires that consumers have the facts to make an informed decision and are protected against misleading conduct.1

Food labelling is an important means of communicating product information to consumers. With animal husbandry labelling, the average consumer is unlikely know what reasonable standards are and would rely on labelling to help them make informed purchasing decisions. Consistency and truth in free-range egg labelling are critical because consumers pay a premium in the belief that products meet their expectations of a free-range production system.

It is CHOICE's view that the words 'free-range' when used in relation to eggs represent:

- To the reasonable person in the general public that birds have access to the outdoors and space to move around with a maximum number of birds that is acceptable by animal welfare standards; and
- To a significant subclass of persons in the general public that there is a maximum outdoor stocking density of 750 or 1500 birds per hectare; or
- To a significant subclass of persons in the general public that there is a maximum outdoor stocking density which is in a range that includes 750 or 1500 birds per hectare (but would not extend to 20 000).

In addition, it is CHOICE's view that there must be consistency in the maximum stocking densities adopted by products that make representations regarding free-range egg labelling as the reasonable person in the general public considers that the words 'free-range' when used on different products represent the same or similar standards.

The Model Code of Practice for the Welfare of Animals: Domestic Poultry<sup>2</sup> defines free-range egg production and sets a maximum outdoor stocking density of 1500 birds per hectare. This was legislated in Queensland<sup>3</sup> and is reflected in free-range certification schemes already in the market.

Many consumers rely on certification logos to provide assurance that the product is genuinely free-range so it is imperative that certification logos are backed by strong and consistent standards. However, Clause 3.19 (a) of the AECL's CTM application would set a maximum outdoor stocking density equivalent to 20 000 birds per hectare, which is 13 times greater than the limit in the Model Code.

<sup>&</sup>lt;sup>1</sup> Consumers International 'Consumer rights' http://www.consumersinternational.org/who-weare/consumer-rights.

<sup>&</sup>lt;sup>2</sup> 4<sup>th</sup> Edition, 'the Model Code'.

<sup>&</sup>lt;sup>3</sup> Section 17 of the Animal Care and Protection Regulation 2002 (QLD).



CHOICE conducted quantitative research on consumers' expectations of free-range labelling.<sup>4</sup> Although most participants expect free-range to mean hens have more space with a maximum number allowed outside per hectare, the majority don't know what the maximum stocking density should be. This undoubtedly reflects the difficulty for many consumers of quantifying their expectation that hens have space to move around.

At the same time, a significant class of survey participants supports limits of 1500 or 750 birds per hectare, while there was virtually no support for a stocking density maximum of 20 000 birds per hectare. This suggests a significant number of consumers are familiar with the current definition and existing standards and expect 'free-range' to meet these standards.

Further, over 3100 people signed an open letter on CHOICE's website asking the ACCC to reject the AECL's proposed CTM. Attachment 1 contains the letter and signatures while Appendix 1 contains a selection of comments to provide qualitative feedback on consumers' expectations.

CHOICE believes the CTM has the potential to mislead consumers by representing that eggs labelled free-range which carry its logo meet accepted standards when they do not. Many consumers would have difficulty distinguishing between the standards behind the AECL's logo and existing logos. At the same time, the class of consumers who are aware of existing standards may assume the AECL scheme meets these standards. For both classes of consumers, consistency in the standards that underpin free-range certification schemes is critical.

There are also competition implications because companies which respect the current limit may find it difficult to compete with companies producing more eggs on less land under the proposed stocking density. Ultimately, consumers may lose confidence in free-range labelling altogether and this would generate public detriment.

CHOICE supports the Model Code definition. Robust, independent research would be needed to justify a stocking density maximum 13 times greater than the current limit and the AECL has failed to identify such research. CHOICE believes the consumer protection, competition and public detriment implications mean the ACCC should reject the AECL's proposed CTM.

### 2. DEFINITION OF FREE-RANGE EGGS

The definition of free-range in the Model Code specifies a maximum outdoor stocking density of 1500 birds per hectare for egg layer hens. In Appendix 2, the relevant clause **A2.1.4** is headed 'Maximum Acceptable Live Weight Densities for Free-Range Birds' and consists of 3 paragraphs following the word 'Outdoors'.

The first paragraph of A2.1.4 states: 'For layer hens a maximum of 1500 birds per hectare.' CHOICE believes the drafters of the Model Code used clear language to state a maximum stocking density for egg layers by using the word 'maximum'. The Macquarie Dictionary defines 'maximum' as 'the greatest quantity or amount possible, assignable, allowable, etc.; the highest amount, value or degree attained or recorded (opposed to minimum)'.

<sup>&</sup>lt;sup>4</sup> CHOICE Survey on Consumer Expectations of Free Range Egg Labelling, May 2012.



We are aware that the AECL has a different interpretation of A2.1.4 based on a later paragraph which contains a note specifying conditions in which higher stocking densities may be permitted. We disagree with this interpretation because we believe the note is confined to meat chickens.

The second paragraph states that for meat chickens, 'a proportionately higher stocking density than for layer hens may be used'. This reinforces CHOICE's interpretation that A2.1.4 sets a maximum stocking density for egg layers: not only does the reference to a higher stocking density than for layer hens suggest there is a maximum stocking density for layer hens, the possibility of a higher stocking density is introduced in a way that is limited to meat chickens.

The third and final paragraph of A2.1.4 contains the note relied on by the AECL which states 'Any higher bird density is acceptable only where regular rotation of birds onto fresh range area occurs...'. However, CHOICE believes the note only applies to stocking densities for meat chickens and not egg layers because the clear statement of a maximum for egg layers does not envisage circumstances in which a higher stocking density may be permitted. It is logical to confine the note to meat chickens because the idea of a proportionately higher stocking density is raised in the second paragraph in relation to meat chickens, in contrast with the first paragraph which states there is a maximum for egg layers.

CHOICE supports the definition in the Model Code because it is the result of a comprehensive process that involved input from government, industry and animal welfare stakeholders. The Model Code was prepared by the Animal Welfare Committee (AWC), which had representation from the federal, state and territory agriculture departments and the CSIRO, under the Primary Industries Ministerial Council. CHOICE believes that any alteration to the maximum stocking density would only be acceptable through a review of the Model Code based on broad stakeholder input and independent, peer-reviewed research by animal welfare experts.

The Model Code maximum stocking density has been codified in Queensland<sup>5</sup> and there is proposed legislation in New South Wales<sup>6</sup> and South Australia<sup>7</sup> based on the Model Code definition. It is also reflected in the many certification systems already in the market which set maximums at or below 1500 birds per hectare.

# 3. LEGISLATIVE APPROACHES

Queensland is the only jurisdiction with a legislated maximum stocking density. Section 17 of the Animal Care and Protection Act 2001 (QLD) sets a maximum outdoor stocking density of 1500 birds per hectare for free-range egg systems which is consistent with the Model Code definition. The Australian Capital Territory has labelling regulations.

The NSW Legislative Council passed the Truth in Labelling (Free-range Eggs) Bill 2011 (NSW) that would set a stocking density of 1500 birds per hectare for free-range eggs. 8 It is understood that the NSW Government does not support the legislation, however, and the NSW Food Authority recently launched a website which it claims will inform consumers about free-range labelling

<sup>&</sup>lt;sup>5</sup> Section 17 of the Animal Care and Protection Regulation 2002 (QLD).

<sup>&</sup>lt;sup>6</sup> Truth in Labelling (Free-range Eggs) Bill 2011 (NSW).

<sup>&</sup>lt;sup>7</sup> Food (Labelling of Free-range Eggs) Amendment Bill 2012 (SA).

<sup>&</sup>lt;sup>8</sup> Truth in Labelling (Free-range Eggs) Bill 2011 (NSW).



schemes. CHOICE has raised concerns that the information contained on the website may mislead consumers because it is based on the view that the Model Code does not set a maximum stocking density. 9

Opposition parties in South Australia introduced the Food (Labelling of Free-range Eggs) Amendment Bill 2012 (SA) that would prohibit the use of free-range claims on eggs from operations exceeding 1500 birds per hectare.

CHOICE welcomes the efforts of jurisdictions to act in the interests of consumers by setting standards but we believe a national approach is preferable to ensure consistency and reduce the potential for consumer confusion. We would support a comprehensive review of the Model Code with broad stakeholder input and the potential to mandate provisions in legislation. It would do little to promote national consistency if the AECL were to pre-empt any review process by introducing a new standard that is substantially different to the existing Model Code definition.

### 4. EXISTING CERTIFICATION SYSTEMS

There are many certification schemes already in the market and most set stocking density standards at or below the 1500 birds per hectare maximum specified in the Model Code definition. For example:

- Humane Choice: maximum 1500 birds per hectare.
- Free Range Poultry Association of Queensland: maximum 1000 birds per hectare.
- Australian Certified Organic: maximum 1000 birds per hectare.
- Free Range Farmers Association (Vic): maximum 750 birds per hectare.

The RSPCA's Approved Farming Scheme does not require that birds have access to an outside range but where there is access, it sets a maximum of 1500 birds per hectare on a fixed range system. Producers may apply for approval for to up to 2500 birds per hectare where there is rotational range access.

CHOICE understands that the AECL's current maximum is 1500 birds per hectare. 11

# 5. AECL'S PROPOSED CERTIFICATION TRADE MARK

CHOICE is concerned by the free-range outdoor stocking density proposed in the AECL's Farm Standard for Egg Producers which underpins the CTM. Clause 3.19(a) sets a maximum outdoor stocking density of 2 birds per square metre (20 000 birds per hectare) and recommends regular rotation and environmental management.

<sup>&</sup>lt;sup>9</sup> Angela McDougall, 'Egg labelling website falls short' CHOICE Consumer News, 22 June 2012 <a href="http://www.choice.com.au/media-and-news/consumer-news/news/government-website-undermined-by-free-ranging-approach-to-definition.aspx">http://www.choice.com.au/media-and-news/consumer-news/news/government-website-undermined-by-free-ranging-approach-to-definition.aspx</a>.

<sup>&</sup>lt;sup>10</sup> CHOICE notes that the Australian Standard for Organic and Biodynamic Products AS6000 does not set an outdoor maximum stocking density.

<sup>&</sup>lt;sup>11</sup> CHOICE's requests to the AECL for a copy of its current standard have not been fruitful.



CHOICE objects to 3.19(a) because of the lack of independent evidence to support a 13-fold increase on the Model Code definition.

The AECL has referred to research, but in all instances the research is either funded by the AECL or unsuitable for the purposes claimed. For instance, the AECL relies on a study by the Scottish Agricultural College to support a stocking density of 20 000 birds per hectare. However, the head of the College's Avian Science Research Centre, Dr Victoria Sandilands, has been quoted as saying "If the Australian Egg Corporation thinks that 20 000 hens/hectare is acceptable outdoors, then it would be too far a stretch to say this is based on our work. This alteration would need considerable research on what is acceptable outdoors to back it up." Further, Dr Sandilands told CHOICE the study was conducted indoors and was a 'small student project'. 13

The AECL commissioned research including qualitative and quantitative consumer research which it released in May and June 2012 respectively (see Section 6(c) AECL research). The AECL has also referred to economic modelling it commissioned, however the AECL has not released it.

CHOICE notes the AECL raised the prospect of an outdoor stocking density increase to 20 000 birds per hectare as early as June 2010, 14 well before its research was conducted. This raises the possibility that the AECL decided on a stocking density and subsequently sought to substantiate the increase by commissioning evidence.

CHOICE does not believe this is an acceptable way to set standards that impact on the ability of consumers to make informed decisions. We think standards should respond to evidence and not the other way round. A stocking density of 20 000 birds per hectare is 18 500 birds higher than the Model Code definition and cannot be supported without independent and robust evidence. In the absence of such evidence, CHOICE believes the ACCC should reject the proposed CTM.

## 6. CONSUMER EXPECTATIONS OF FREE-RANGE EGGS (a) CHOICE open letter to the ACCC

In order to help consumers communicate their expectations of free-range eggs to the ACCC, CHOICE published an open letter online to which concerned members of the public could add their names. 15 The letter is attached at **Attachment 1** with the names of the 3101 people who signed in agreement that the AECL's proposed CTM would cause public detriment and potentially mislead consumers by setting a maximum stocking density 13 times greater than the current definition in the Model Code.

Many individuals left comments on the petition website providing detail about their expectations of free-range labelling and standards. We have included a sample of the comments for the ACCC's consideration in **Appendix 1**.

<sup>14</sup> 'Free-rangers in egg threat' Weekly Times 30 June 2010

http://www.weeklytimesnow.com.au/article/2010/06/30/204411\_business-news.html.

<sup>&</sup>lt;sup>12</sup> Tim Barlass, 'Scare tactics: Greens hit out over free range eggs plan' Sydney Morning Herald 5 May

<sup>&</sup>lt;sup>13</sup> Email from Victoria Sandilands to CHOICE 3 May 2012.

<sup>15</sup> http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/organic-and-freerange/free-range-egg-petition.aspx



# (b) CHOICE research

A CHOICE online member survey was completed between 23 April 2012 and 4 May 2012 by 900 CHOICE members who elected to complete it. 16 Purchasing of free-range products was high with 93% of respondents having chosen free-range products in the preceding 12 months. While respondents said choosing free-range was important across a range of products, buying freerange was essential for the greatest number of respondents when it came to eggs, followed by poultry. 85% of respondents said it was essential or important to buy free-range eggs.

A key aim of CHOICE's research was to find out what motivates consumers to buy free-range eggs and what their expectations of free-range are. The most popular reason for choosing freerange products was animal welfare which was selected by 85% of respondents. Other popular reasons were perceptions that free-range eggs are chemical free (52%), better tasting (47%) and better for the environment (44%).

When asked about the meaning of free-range, the most popular descriptions concerned the ability of hens to move around and access the outdoors:

- 69% said free-range meant birds were never confined in cages;
- 66% said birds have more outdoor space as a maximum number of birds is allowed outdoors; and
- 65% said birds have easy access to pasture.

Participants were asked what a reasonable outdoor stocking density was for free-range egg laying hens and given the options of 750, 1500, 10 000 or 20 000 birds per hectare along with the option of 'I don't know'. While 65% of respondents said they didn't know, 28% of respondents selected 1500 or 750 and less than 1% selected 20 000.

CHOICE is not surprised that the majority of respondents said they didn't know what a reasonable maximum stocking density was. While the survey results clearly show that consumers understand free-range to mean birds have access to the outdoors and space to move around governed by a maximum number of birds, there is an understandable difficulty in converting these expectations into a number.

What is clear from CHOICE's research is that there is virtually no support for the AECL's proposed stocking density. The comparatively strong support for stocking densities of 1500 or 750 birds per hectare suggests that a significant class of free-range buying consumers is engaged and familiar with existing standards and certification systems.

The survey results also showed that 38% of participants look for a free-range logo to assure them that eggs are free-range, while 43% rely solely on the words 'free-range'. This highlights the need for robust free-range standards to ensure truth in free-range labelling and that these standards must underpin certification schemes to give consumers confidence they are getting what they pay for when they choose free-range eggs.

The results of CHOICE's research present a strong argument against the adoption of a stocking density 13 times greater than the current limit. To justify such an increase, independent

<sup>&</sup>lt;sup>16</sup> Participation was restricted to people responsible for buying or choosing food for their household. There was representation across all groups within the key demographic categories of gender, age and location.



consumer research would be essential. Even then, CHOICE believes that independent, peer-reviewed research by animal welfare experts is fundamental to ensure a robust standard.

### (c) AECL research

The AECL has not made public any independent, rigorous consumer research that supports the maximum outdoor stocking density proposed in the CTM rules for free-range egg production. The AECL has funded research but has only released some of it.

The AECL commissioned Brand Story to undertake qualitative research and released a Final Report dated 11 May 2012 and Summary dated 17 May 2012. CHOICE has serious concerns about the robustness of this research and believes it should not be used to justify a stocking density of 20 000 birds per hectare. Our concerns include:

- The focus groups appear to have involved a total of fewer than 140 people which is not a representative sample. Despite this, Brand Story reported the findings as representative of all consumers in its Summary.
- A key finding was that 'Consumers consider the proposed stocking density of 2 birds per square metre [20 000 birds per hectare] to be reasonable considering the ramifications of lower densities on price, availability of eggs and the future of the industry.'<sup>17</sup>
  - Firstly, it is inappropriate to extrapolate findings from a small qualitative sample to consumers generally.
  - More significantly, the report states that participants were told that the price of free-range eggs could more than double and reach \$13 per dozen if a stocking density below 20 000 per hectare were imposed. This is based on economic modelling the AECL has not released so it cannot be scrutinised.
  - CHOICE believes free-range standards should not be set to protect against possible price increases. Prices may be artificially low due to the current lack of standards observed by AECL members and the market should be allowed to respond based on appropriate standards.
- Focus group participants were shown footage from a facility selected by the AECL which may not be representative.
- Focus group participants were not shown footage from facilities with lower stocking densities meaning there was no point of comparison for participants.
- The Final Report included some negative comments from participants which were unrecognised in the Summary or findings generally. Particularly telling is the comment: 'Why are they all inside?' The AECL has stated that between 30% and 60% of hens are outside the hen house at any time with the rest inside. CHOICE questions whether consumers generally expect free-range to mean that up to 70% of the hens are inside. Further, CHOICE understands these figures are contested by many free-range farmers who suggest the percentage of hens outside is much higher on well-managed farms.

Ultimately, CHOICE believes consumer expectations of free-range labelling are an important consideration in setting standards but consumers are not best placed to determine a reasonable outdoor stocking density. This is partly because of the difficulty translating their expectations into numbers, but mainly because the average consumer does not have an understanding of hen welfare and behaviours. CHOICE believes any stocking density change should be based primarily on independent, peer-reviewed research by animal welfare experts.

<sup>&</sup>lt;sup>17</sup> Brand Story 'Free-Range Stocking Densities - What Consumers Think' 17 May 2012.



7. IMPLICATIONS OF APPROVAL OF THE AECL'S PROPOSED CERTIFICATION TRADE MARK The approval by the ACCC of the AECL's CTM is likely to have serious implications for consumers, competition and the public interest.

The value of a CTM is that it provides assurance to purchasers that products meet particular standards. A CTM with standards covering free-range egg production represents that the certified product meets standards around animal welfare. CHOICE believes consumers would have difficulty distinguishing between the standards that underpin the different certification schemes and that the ACCC's approval of a standard 13 times greater than existing standards would create considerable inconsistency. Consumers who believed the CTM guaranteed existing standards were met would therefore be misled.

CHOICE believes there are two particular classes of consumers at risk of being misled by the presence of the AECL's CTM on eggs labelled free-range. The first, larger class of consumers consists of those people who buy free-range eggs because they believe free-range means the hens have space to move around outdoors governed by maximum stocking densities, but don't necessarily know what that stocking density should be. Those consumers are likely to view the CTM as providing assurance that the product has been assessed against accepted free-range standards. They would be misled because this is not the case.

The second class of consumers likely to be misled is the smaller but substantial group of consumers who are aware of existing free-range standards and believe a reasonable stocking density is 1500 bird per hectare or less. Our research suggests this class of people could be as high as 28%. These consumers may assume the AECL logo represents consistency with existing standards when, again, it is inconsistent.

CHOICE also believes the proposed CTM raises competition concerns. By allowing a stocking density 13 times greater than the limit imposed by certification schemes already in the market, larger companies have the opportunity to produce more eggs on less land and thereby lower production costs. These companies can label the product free-range and use a CTM logo which represents that the product meets accepted standards. They are therefore able to profit from the goodwill created by smaller scale producers and existing certification systems and gain greater market share through prices that don't reflect genuine free-range production.

The result is likely to be that companies that respect the 1500 birds per hectare limit imposed by the Model Code and existing certification schemes find it difficult to compete and may exit the market. This would have a detrimental effect on competition.

CHOICE also believes that a longer term implication is public detriment as consumers become aware that free-range standards have been diluted. They may lose confidence altogether in the free-range claim which is detrimental for consumers seeking to make ethical decisions and the free-range egg industry.

CHOICE therefore recommends that the ACCC reject the AECL's proposed CTM in order to protect consumers, maintain competition in the free-range egg market and prevent public detriment.



# APPENDIX 1: Public comments on CHOICE's petition website<sup>18</sup>

'I purposely only buy organic eggs, specifically because the rules around free-range are so unclear.'

28 June 2012

'I am more concerned about the welfare of the animals than the price, but we should not be ripped off paying higher prices for eggs from poorly treated chickens. Packaging is very misleading to say the least.'

26 June 2012

'I want genuine FREE-RANGE eggs and chicken that has been treated with respect and care. To be sustainable I believe we need to reject the EGG CORP density standards.'
23 June 2012

'I want to buy free-range, and I want to be confident that 'free-range' really means something justifiably free. The egg section at my supermarket is the most confusing for me of all the sections in my supermarket. I want to have a clear idea and understanding of what free-range is and that there are clear rules for what constitutes free-range.'
22 June 2012

'Free-range should mean exactly that - free-range. Birds should be able to form subgroups or tribes instead of being part of a giant mob. Birds should be able to get at least some nutrition from live plants growing in their paddocks. I don't have a problem with battery caged birds or with intensively grown meat birds. I do have a problem when the meaning of free-range becomes blurred'

20 June 2012

'I believe chickens should not be caged but should be allowed to move about freely, outdoors, in their pasture/field. I also believe that there should be an independent body to verify a company's claims that their chickens are truly "free-range" and that this information should be freely available to consumers. Along with an appropriate sign on packaging that guarantees that eggs are truly free-range and makes it easy for consumers to identify true free-range eggs in the supermarket.'

14 June 2012

'If there are 20 000 chickens in a 1 hectare enclosure it can't be labelled free range as there would be very little space in which a chicken could range freely.'
9 June 2012

'1500 X 13 = 19 500 What a joke. I live on a property of 2 Ha and to think that 39,000 chooks could be put on this size of land and still be called free-range. Who are they kidding? No difference then from Barn laid eggs. I wouldn't bother buying "free-range" under those "standards"'

5 June 2012

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<sup>&</sup>lt;sup>18</sup> Names have not been used to respect commenters' privacy. Full comments available at <a href="http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/organic-and-free-range-egg-petition/comments.aspx">http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/organic-and-free-range-egg-petition/comments.aspx</a>. Accessed 29 June 2012.



'2500 per hectare seems like a reasonable number, that's 1 bird per 4 meters square by my calculations. 20 000 per hectare is 1 bird every 0.5 meters square, that's not free-range.' 4 June 2012

'The reason I buy free-range is because I am concerned about the welfare of the hens. If you allow them to be crammed into smaller areas I might as well buy caged eggs, its all the same! If the farmers have to charge me more then so be it, I am willing to pay for the right to a more natural life of the hen. Its that simple I WILL PAY MORE!'

4 June 2012

'I find the intent to increase bird numbers per hectare abhorrent. It is about time we considered animal welfare over profit welfare even if it means increased prices.'

4 June 2012

'20 000 hens to a hectare means each hen has half a square metre to stand in. That does not fit my idea of "free-range" at all. That is crowded! Not much better than the totally inhumane "battery" hens.'

3 June 2012

'The Egg Corporation is clearly bowing to pressure from producers who want to move the "free-range" goalposts. To avoid losing market share to farmers catering for the increasing numbers of consumers who are prepared to pay more for farm produce that is genuinely free-range they want "free-range" to be redefined to include their existing dubious practices. I would like to see more effort put into strengthening and enforcing the current standard, not watering it down. Yes, food that is properly produced costs more. I suggest we get used to it and eat less.' 3 June 2012

'I would like to be informed when and if the proposed 20 000 bird/hectare "free-range' standard comes into effect. If it does, I will no longer buy free-range eggs certified by the Australian Egg Corporation. I would never again trust anything to do with the Australian Egg Corporation.' 2 June 2012

'I would like to be able to see some truth in advertising and packaging.' 2 June 2012

'That's 2 chooks per square metre! There would be nothing edible on the ground within a week. That's not 'free-range.''

2 June 2012

'Without accurate and honest labelling of foods and all consumer goods, the shadows where opportunists and other vagabonds dwell will continue and the consumer doesn't know he/she is being conned nor can't influence the market through choosing ethical suppliers. Bring it all on!' 2 June 2012

'I choose to buy free-range eggs for myself and my family expecting that the chickens laying these eggs are treated well, just as I would treat chickens if I chose to keep them in my own backyard.'

2 June 2012

'We already pay extra and buy free-range eggs I want to know that they really are free-range. If they want to call them uncaged birds and say that they carry 20 000 per hectare then people would know what they are buying. They should not be called free-range eggs when they have so little room and would end up fighting each other.'

2 June 2012