



For all creatures great and small.

Ms Sue Holmes
Assistant Commissioner, Regulation Stocktake
Productivity Stocktake
PO Box 80
BELCONNEN AU1' 2616

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Dear Ms Holmes

Labelling of animal products - the need for an effective regulatory system

RSPCA Australia believes that consumers have the right to be provided with full and accurate information about the production method used for the animal products they buy to enable them to make informed decisions.

To this end, RSPCA Australia would like the Commission to inquire into the labelling of animal products and provide recommendations on the development of nationally recognised definitions of animal welfare-orientated production methods.

At present, the only animal product that is regularly labelled according to its production system are carton eggs. There are three recognised definitions: caged, barn and free range, as defined in the Model Code of Practice for the Welfare of Animals: Domestic Poultry and available at <http://downloads.publish.csiro.au/books/download.cfm?ID=3451>. While labelling of cartons is voluntary in some states, it is mandatory in the ACT and it is also a requirement of the Australian Egg Corporation's quality assurance program.

In contrast, there is no legal or even generally agreed definition of either of the terms "free range" and "bred free range" when it comes to the production of pork in Australia despite these terms increasingly being used in the marketing of pork products. Generally speaking, people tend to assume that the term "free range" indicates that animals have had some access to outdoors and are not kept in close confinement. What is meant by "access to outdoors" and "close confinement" is also often undefined and poorly understood.

In the absence of any recognised definitions for such terms as "free range", "bred free range", "organic", "biodynamic", etc. to describe welfare-oriented production methods, the public tend to assume that these terms confer some improvement in animal welfare over other production systems. This may or may not be the case and will be greatly influenced by the standards applied and the way in which the system is managed.

A useful discussion of the assumptions based around labelling terms is provided in the UK Farm Animal Welfare Council's 2006 report on welfare labelling, which can be accessed at <http://www.fawc.org.uk/reports/welfarelabel-0606.pdf>.

RSPCA
Australia Inc
ABN 99 668 654 249

Patrons in Chief

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Major General
Michael Jeffery,
AC, CVO, MC(Retd)
Governor-General of the
Commonwealth of
Australia

Her Excellency
Mrs Marlena Jeffery

Patron

The Hon Justice
Michael Kirby
AC, CMG,
Hon D Litt, Hon LLD

Chairman Scientific Advisory Panel

Professor Ivan W Caple
BVSc, PhD, MACVSc

Phone (02) 6282 8300
Fax (02) 6282 8311
Email rspca@rspca.org.au
Web www.rspca.org.au

Postal Address
PO Box 265
Deakin West ACT 2600
Australia

RSPCA Australia recognises that the development of a nationally consistent approach to the labelling of welfare-oriented animal products is part of a larger debate on the labelling of food products. Consumers are becoming increasingly discerning towards the ethical issues surrounding food production and given that there are significant differences in the welfare of animals exposed to different production methods, we believe that the labelling of welfare-oriented animal products should be given high priority. Independent labelling will provide consumers with reliable information on the production system employed.

RSPCA Australia is not alone in wishing to see this aspect of labelling addressed. In its recent submission to the Productivity Commission's Annual Review of Regulatory Burdens on Business, Australian Pork Limited identified the absence of an effective regulatory system relating to "free range" and "organic" status as an area of concern. In our recent correspondence with the Australian Competition and Consumer Commission regarding the terms "free range" and "bred free range", it became apparent that the absence of a mandatory standard for product labelling allowed the often arbitrary use of such terms to continue without being considered false representation.

RSPCA Australia wishes to work with the appropriate organisations to help define the terms used in welfare-related labelling of animal products to ensure that they accurately reflect production systems.

Your assistance in this matter would be much appreciated.

Yours sincerely

Heather Neil
Chief Executive Officer
RSPCA Australia