The Happy Hen on Your Supermarket Shelf

What Choice Does Industrial Strength Free Range Represent for Consumers?

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ABSTRACT

This paper investigates from a consumers' point of view, what "free range" eggs are available for sale in supermarkets in Australia, what "free range" means on their labelling, and what alternative they offer to cage production. The paper concludes that the label "free range" on the eggs for sale in the two dominant supermarkets in Australia approach is broad and ambiguous enough to encompass both "artisan", small scale, mixed and organic egg farming as well as intense, industrial egg production methods. This allows "free range" eggs to be produced at a price and on a scale and level of reliability and convenience that keeps eggs within mainstream industrial factory farming, concentrated marketing and distribution, and supermarket sale. It does not necessarily address all the problematic issues with hen welfare in intense factory farming.

KEY WORDS

Animals

Ethics

Food supply

It's no coincidence that people in most peasant cultures keep chooks. Backyard chook-keeping makes sense. Hens eat the stuff you don't want, and give you eggs, meat and fertilizer in return. Everyone can keep hens even if you don't have optimum conditions, they will still be better than those that battery hens experience: crammed in small wire cages and fed with antibiotics to keep them alive. Anyone who eats eggs or hens from the battery poultry industry helps keep this system going... (French 2010, 3)

1. INTRODUCTION

In 2012 the Australian Egg Corporation Limited's ("Egg Corp") application to the Australian Competition and Consumer Commission (ACCC) for approval of its revised and re-branded "Egg Standards Australasia" (ESA) certification trademark generated huge controversy and publicity. At face value, the ESA would be a standard quality assurance accreditation scheme with a trademarked logo similar to those used in many industries. Yet the ACCC took the unusual step of widely calling for public submissions on the application, meeting with a range of interested stakeholders and regulators and even visiting three egg farms. It received 1700 submissions – all but seven arguing against the proposed certification (ACCC 2012, para 42). A bevy of consumer and food advocacy groups organized vigorous campaigns against the proposed new standard, media coverage of the issue was high (and highly emotional) and the Egg Corp, which is the industry association for the egg production industry, itself vigorously argued its case in mainstream and social media.

Controversy centered on the Egg Corp's proposal to define "free range" eggs to include a maximum outdoor stocking density of 20 000 hens per hectare or 2 hens per square metre, which is 8 to 26 times more than the maximum stocking densities allowed by alternative voluntary accreditation and logo systems for "free range" and "organic" eggs in Australia and internationally and 13 times more than the *Model Code of Practice for the Welfare of Animals: Domestic Poultry* ("Model Code of Practice")¹ agreed by Australian and New Zealand governments (Primary Industries Standing Committee 2002) (see Table 1; ACCC 2012, para 82). In comparison to alternative standards, the Egg Corp's free range requirements provide for little management of vegetation and environmental conditions on the ranging area to make it attractive for hens. There is no limit on the number of birds allowed in a single barn or site, and no requirement about the minimum proportion of time that they should have access to outside.

Similarly, the Egg Corp proposes an indoor stocking density of approximately 15 birds per square metre, while it is half that under alternative accreditation standards. The Egg Corp would allow free range production to use animal "husbandry" practices such as beak-trimming, toe trimming, forced moulting, and the use of antibiotics and colourants in the feed, all of which are prohibited under alternative systems (all summarised in Table 1).

The underlying issue, as this paper shall show, is whether it is possible for intense large scale "factory" farming to produce "free range" eggs as a real alternative to intense, factory farmed cage eggs for consumer sale in mainstream supermarkets at all. This paper investigates from a consumers' point of view, what "free range" and "organic" eggs are available for sale in supermarkets in Australia, what "free range" or "organic" means on their labelling, and what

¹ This is a governmentally created non-mandatory guidance standard. Generally the law of the states and territories provide that compliance with the various Model Codes of Practice for each type of farm animal will act as a safe harbor from prosecution for breach of animal cruelty offences. These offences are the only animal welfare regulation applying to farm animals in Australia (see McEwan 2011, 1-5). The *Model Code of Practice* is mandated in one state, Queensland: *Animal Care and Protection Act 2001* and *Animal Care and Protection Regulation 2002*, regulations 2 and 3, and Schedule 1.

alternative they offer to cage production. The paper concludes that the label “free range” on the eggs for sale in the two dominant supermarkets in Australia approach is broad and ambiguous enough to encompass both “artisan”, small scale, mixed and organic egg farming as well as intense, industrial egg production methods that raise many problematic issues for hen welfare. This diverts attention away from alternative ways of organising the production and retailing of eggs.

[Table 1 about here.]

2. THE RISE OF FREE RANGE AS AN ALTERNATIVE TO INTENSE, INDUSTRIAL CAGE PRODUCTION

The Rise of Free Range

Eggs are big business: In 2011 egg production in Australia was worth \$572 million (AECL 2012b). Global per capita egg consumption has doubled since 1950 (Weis 2007). Australian egg consumption is rising from lows of around 140 eggs per capita in the 1980s and 1990s to 213 eggs per capita in 2011 (ABS 2011; AECL 2011).

Most egg production in Australia (and globally) is still caged egg production. But the popularity of non-caged eggs is growing, with “free range” lines accounting for 28.4% of grocery retail egg sales in 2011, up from 14.5% in 2005 (AECL 2005-2011).

Despite campaigning by animal advocacy organisations in Australia, a ban on cage egg production and sale has been rejected by Australian governments (SCARM 2000).² When Australian governments decided not to ban battery cages they decided instead to take an industry-led consumer choice approach in which “cage”, “barn” and “free range” eggs would be clearly differentiated and labelled so that consumers could choose which they preferred (SCARM 2000, 4). The Egg Corp’s voluntary “Egg Corp Assured” quality assurance certification program, which addresses general quality assurance, food safety, biosecurity and animal welfare, was the result. Its animal welfare requirements are based on the fourth edition of the *Model Code of Practice* and allow commercial producers to use any of three different production methods for eggs – “cage”, “barn” or “free range.” The different systems are defined in the following ways (Primary Industries Standing Committee 2002, 3-4):

Birds in cage systems are continuously housed in cages within a shed.

Birds in barn systems are free to roam within a shed which may have more than one level.

Birds in free-range systems are housed in sheds and have access to an outdoor range.

Caged facilities house ten thousand or even a hundred thousand layer hens in a single shed in several rows of three, four or five vertical layers with multiple sheds on a single site (Outlaw 2012; RSPCA 2012b).³

Both the existing Egg Corp Assured scheme (and the proposed new ESA) and the *Model Code of Practice* set lower standards for “free range” than other certification systems aimed more specifically at free range and organic farming as summarised in Table 1. Organisations

² With the exception of the ACT which passed legislation in 1997 banning both the production and sale of cage eggs in the ACT. This legislation never came into effect as it was determined that it would breach national competition principles by restricting competition between the states: Productivity Commission 2000.

³ See also Poultry Hub Website: <http://www.poultryhub.org/>

like Choice and the Free Range Farmers Association argue that the *Model Code of Practice* sets 1500 hens per hectare outdoors as the maximum stocking density for “free range” layer hen systems. The Egg Corp however reads the relevant clause as putting no limits on outdoor stocking density.⁴ The Egg Corp claim that according to an anonymous survey, “29% of free range egg production in Australia stocks at densities higher than 2 hens per square metre (20 000 per hectare) on the range area.” (AECL 2012a). The Egg Corporations says that it “does not consider this to be appropriate,” hence its proposal that its new “Egg Standards Australasia” system will “address this and draw a ‘line in the sand’ at a responsible and transparent maximum outdoor or range density” (AECL 2012a) of 20 000 hens per hectare.

Problems with Intense Industrial Cage Egg Production

A Choice survey of its own members found that they bought “free range” eggs predominantly for animal welfare reasons, with taste, health, and environmental reasons as secondary (Choice 2012). Consumers pay a premium for these eggs. The average price for a dozen eggs was \$4.00 in 2010 (AECL 2011). Meanwhile, a dozen free range or organic eggs will commonly cost \$6.00 (free range) and \$8.00 (organic) at major supermarkets, {and over \$10.00 when purchased at alternative organic and wholefoods stores.⁵

Therefore, what can be represented to the retail consumer as an “ethical”, “free range” egg is critical to the profits of supermarkets and egg producers. The growth of alternate retail spaces such as farmers markets (where consumers can buy eggs direct from smaller scale farmers who free range their chickens) and from organic stores (that require organic certifications or otherwise check the practices of the farms the food comes from) and the growing popularity of backyard keeping of chickens all make this issue more pressing (Elks 2012).

Outsiders are rarely allowed to see inside factory egg farms, and little reliable information is available (even less for Australian egg farming than for US egg farming) on the details of egg production. However, the fundamental characteristics and risks of intense caged egg production are known. Australian cages must provide each hen with floor space about the size of an A4 sheet of paper under the *Model Code of Practice*.⁶ Such space is insufficient to permit hens to spread their wings or turn around (Weis 2007, 60), let alone perform natural

⁴ The *Model Code of Practice* provides that there should be a maximum stocking density of 1500 hens per hectare outdoors for a free range system. However there is a provision following this that applies to meat chickens and says that a higher stocking density can be used for meat chickens than layer hens when they have a shorter period of time on the range as long as there is rotation on the range. The relevant clause states (and is split into separate lines) as follows:

For layer hens a maximum of 1500 birds per hectare.

When meat chickens use only some of the 10 week cycle on pasture (eg 4 weeks) a proportionately higher stocking density than for layers may be used.

NB Any higher bird density is acceptable only where regular rotation of birds onto fresh range areas occurs and close management is undertaken which provides some continuing fodder cover.

The Egg Corporation and some egg producers have interpreted this to mean that there can be a higher stocking density for layer hens (not just meat chickens) where there is rotation of birds onto fresh range areas.

⁵ Based on our own data collection in Canberra, Sydney and Melbourne in 2012, described below.

⁶ An A4 sheet of paper is 627cm². The MCP requirements for battery cages were slightly improved from 1 January 2001 so that the amount of space per chicken in cages was increased from 450 cm² to 550 or 600 cm² per bird (depending on the weight of the bird) in cages with 3 or more birds. The MCP also already provided that chickens must be able to stand naturally in the cage and have access to water. It includes no requirements for “enriched cages”, that is nests, perches or access to a feed trough. The MCP recommends that these space requirements be legislated by the States and Territories and most have done so: *Prevention of Cruelty to Animals (Domestic Fowl) Regulations* 2006 (Vic); *Animal Care and Protection Regulation* 2002 Schedule 1 (Qld); *Animal Welfare (Commercial Poultry) Regulations* 2008 (WA); *Animal Welfare Regulations* 2000 (SA) regulations 13L to 13O; *Animal Welfare Regulations* 1993 (Tas), regulation 6.

behaviours of preening, nesting, perching, foraging and dust bathing (Pickett 2003; RSPCA 2012b).

Sheds are atmosphere-controlled, with lighting and climate artificially set (Loughnan 2012). A conveyor belt which runs along the front of the cages delivers a grain mix to the birds, with another belt behind collecting the daily egg laid (Loughnan 2012). After the hens' 18-month life of efficient egg-laying at a rate of 300 eggs per year, they are considered 'spent' and ground up to make chicken stock and pet food (Loughnan 2012; RSPCA 2012a). During this curtailed lifespan, caged hens endure an array of unnatural conditions, and exhibit atypical behaviours, as detailed in Table 2.

[Table 2 about here.]

To hamper pecking, chicks have part of their beaks removed with a heated blade, causing trauma and often leaving birds in chronic pain (known as "de-beaking" or, more euphemistically "beak-trimming") (Sankoff and White 2009). To address the voluminous amounts of faecal matter birds come into contact with, and the contagious atmosphere thus created, antibiotics are often added to the hens' feed and chemical sprays employed to disinfect the air (Weis 2007). In order to force industrial hens to continue laying, farmers employ various tactics, such as 'forced-moulting,' whereby a hen's food is withheld for up to two weeks until she loses her feathers, then with the reappearance of feed she again begins laying, swiftly restoring production), and food substitution (which entails replacing high-protein quality feed with low-nutrient, low-energy feed) which akin to forced-moulting, significantly reduces a hen's rest period (Loughnan 2012). Artificial lighting is another way to increase production, sidestepping the less-productive Winter months when hens lay less frequently by tricking the hens into laying like machines within the industrial food chain via around the clock electric lighting (Loughnan 2012).

The intense factory farming of layer hens also raises environmental issues. The very nature of industrial animal farming necessitates the input of large amounts of feed, often from afar, the production and transport of which is contingent upon habitat and biodiversity loss, as well as the use of chemical fertilisers, pesticides and fossil fuels (WSPA). Industrialised farming practices also affect the soil, air and water at a local scale, on and surrounding farms. On mixed, integrated farms, the faecal matter from small populations of animals acts as a fertiliser in rotation with grains, legumes and pasture; maintaining healthy, productive soils. In contrast, on industrial-scale egg farms, the mass of chicken faeces must be collected, sold and transported to other farms to act as fertiliser, or else it is dumped collecting in cesspools that contaminate the surrounding air and water (Weis 2007).

The concentration of thousands and thousands of chickens in poor physical conditions in sheds also poses hazards to public health. Cesspools of chicken manure release toxic compounds into the air which can cause inflammatory, immune and neurological problems in humans (California State Senate 2004). The development of the H5N1 strain of avian influenza which can infect humans has been linked by the FAO to industrial-scale clustering of poultry for food production (Nierenberg 2005; Weis 2007). Likewise, research has uncovered links between forced-moulting of industrial egg hens and the threat of *Salmonella Enteritidis*. Forced-moulting suppresses hens' immune systems, allowing a 100-1000 fold increase of *Salmonella Enteritidis* in the birds (Loughnan 2012). This higher prevalence of *Salmonella Enteritidis* in chickens causes sickness not only in birds, but also food poisoning of humans via the consumption of infected eggs and meat (Loughnan 2012). The bioaccumulation of an ever-increasing number of pharmaceuticals used to stimulate growth and resist disease in factory-farmed products such as eggs has long-term human health risks. Antibiotics which are given to humans are commonly employed in factory egg farming, which can lead to antibiotic-resistant bacteria, thus promoting the development of deadlier

infectious diseases for humans, and hampering the effectiveness of some medicines (McKenna 2012; Weis 2007).

The Australian Supermarket Duopoly as Free Range Leaders?

Australian grocery retailing is dominated by the Coles and Woolworths “duopoly” which between them make 80 percent of general grocery sales (Ferrier Hodgson 2011) and 50 percent of egg sales (ACCC 2008, 266). A consumer entering the eggs aisle of one of these two supermarket chains will see about 50 percent of shelf space devoted to “free range” eggs.⁷ Indeed, Coles and Woolworths appear to be trying to keep ahead of consumer sentiment on cage-free eggs. Since 2009 both have dropped the price of free range eggs and announced that they were phasing out their own private label cage egg lines (Miletic 2010; Watson 2009).⁸

The egg industry body, the AECL, has emphasised throughout all of its media and publicity in relation to its new ESA that the objective is to “provide consumers with the confidence to choose eggs from [the three different – cage, barn and free range] production systems according to their budget and preference” (AECL 2012). Even campaigns like those of the RSPCA and Animals Australia urging consumers to “boycott” by not buying cage eggs, and those of the various local, organic and other alternative food movements urging consumers to “vote with your fork” or your “shopping dollar” assume that alternatives are available to buy.⁹

The remainder of this paper critically examines what is in fact available for sale as an alternative to cage eggs in the two dominant supermarkets in Australia.

3. INDUSTRIAL STRENGTH FREE RANGE ON THE SUPERMARKET SHELVES

We collected all the non-cage – “free range”, “organic”, and “barn-laid” – carton eggs for sale in Canberra, Melbourne and Sydney in 2012 at Coles and Woolworths stores in a range of suburbs. We observed how they were displayed in the retail context, the branding and labelling on the actual carton and on any associated websites, what claims were made – explicitly (in words) and implicitly (in pictures, signs and symbols and by context) – about being “free range”. We also looked for what evidence (if any) was available to the consumer about how the eggs were in fact produced and how the production systems addressed the animal welfare, agro-ecological and health aspects of egg production differently (and better) than intense cage production. Particular attention was paid to any reference to assurance and accreditation systems to ensure and evidence that the eggs were produced in a particular way.

Brands Available

The supply of eggs to the two major supermarkets is concentrated among three very large producers and distributors (see Table 3). Between them, these three companies produce and distribute nearly 50 percent of the retail eggs sold in Australia (Outlaw 2012). They are largely vertically integrated with each company responsible for its own production,

⁷ Based on our own data collection in Canberra, Sydney and Melbourne in 2012, described below. Shelves were photographed and the proportion devoted to free range and organic eggs calculated and averaged.

⁸ See the animal welfare sections of the Coles and Woolworths websites: <http://www.coles.com.au/About-Coles/Sustainability/Animal-Welfare.aspx> and <http://www.woolworths.com.au/wps/wcm/connect/Website/Woolworths/About+Us/Our+Planet/Animal+Welfare/> accessed 22 November 2012.

⁹ Animals Australia campaign: <http://www.freebetty.com/>; RSPCA campaign: <http://www.hensdeservebetter.org.au/>

distribution and branding for supermarket sale. They own their own egg production facilities and also have supply agreements in place with smaller producers.¹⁰ The grain-based chicken feed, the chicks and the shed equipment are produced by separate companies. The costs of transporting eggs all around Australia using refrigerated trucks from these concentrated distributors is a further financial dimension of egg production. Two emerging producers and distributors also supply non-cage eggs to Coles and Woolworths (and their smaller competitor supermarkets) around Australia. The same fourteen brands of free range, organic or barn laid eggs supplied by these five companies are widely available in both Coles and Woolworths with little regional variation (see Table 3).¹¹ A fifteenth company (Manning Valley) supplies free range eggs on a large scale to Sydney and Canberra supermarkets.

Both supermarkets also sell their own private label (“Coles” and “Woolworths”) free range and barn (as well as cage) eggs (we found 3 different brands). Private supermarket labels represented about 50 percent of the total market for cage and non-cage eggs in 2011 (AECL 2005-2011; Outlaw 2012). These private label eggs are presumably supplied by one or more of the major egg producers and distributors, but no product source information is publicly available. In addition to these major brands both supermarket chains sell some local and premium free range eggs that are not necessarily available in every store in every region.

Representations about “Free Range” on the Labels

The sheer number of different brands and styles of eggs available in Coles and Woolworths appears to give consumers a choice about the way the eggs they buy are produced. Yet, as far as can be ascertained, the chain of production and distribution behind most of the 20 or so brands available in Coles and Woolworths is largely the same, with the exception of a few premium brands that are not necessarily reliably available in all stores. We identified four main branding and labelling strategies. These mostly focus on selling a story about the authenticity of the farm, the happiness of the hens and the lifestyle values represented by the eggs produced that does more to obscure the actual production conditions for the eggs than it does to inform the consumer about the way the eggs were produced (see Richards et al 2011).

The most numerous category of labels focus on providing text about how the eggs fit into consumers’ values and lifestyles. Some are quite plain and merely feature graphics (stylised representations of eggs, suns and pastures) and colours (green and yellow) that might be associated with hens enjoying sunshine and pasture, and laying wholesome, tasty eggs as the sun rises each morning. Others focus on text but include photos of people hiking through the jungle, doing yoga on a beach, children running through a meadow and a famous chef, presumably to appeal to different consumers’ lifestyle values.

The text on these various cartons tell all sorts of stories about how “good” the eggs are, but provide very little specific information about their production and distribution:

Our healthy hens enjoy life on our free range farms, laying their premium eggs whilst taking in the sunshine and exploring the great outdoors, the way nature intended. Our happy hens produce nutritious eggs, that are rich in flavour and wholesome goodness you’ve come to expect from Pace Farm. From our family to yours. [A list of ticks then states:] 100% family owned. Eggs have no added antibiotics or hormones. Independently audited. Our hens roam freely, forage and nest naturally. Our hens graze on natural grains in open pastures. (Pace Farm Free Range Natural Living Eggs)

¹⁰ Sunny Queen, however, operates mainly as a distributor and marketer, not an owner.

¹¹ Some companies also have additional brands that they sell to the smaller supermarkets, urban markets and fresh produce stores that compete with Coles and Woolworths. Another emerging producer and distributor, Eggceptional Eggs, provides several brands to IGAs and to stalls at urban fresh produce markets like Queen Victoria Market in Melbourne and Paddy’s Market and Flemington Markets in Sydney. All are shown in Table 3.

The labels generally do not tell the consumer what the stocking density is, what proportion of birds access the range for what length of time, nor whether de-beaking is used. However some brands give more information. One brand, for example, provides information about the feed (vegetarian) on the carton:

Free Range Egg Farms has a 100 year farming heritage in Australia. We never feed animal protein by-products. ecoeggs are certified free range as specified in our website. Our hens graze on open pastures and eat select grains and natural supplements to produce great tasting ecoeggs. ecoeggs are a good source of selenium. (H & L Premium, ecoeggs)

There is much more specific information, including audit data and “chook cam” for one of its many facilities, on its website¹² – but not the outdoor stocking density nor the total number of hens per barn on its various .

The next most common label type feature representations of happy hens. Some show very professional, even hyperrealistic, photos of happy hens frolicking in beautiful pastures. These have clearly been posed and edited to emphasise the archetypical ideals of hens, pasture and sunshine. They do not necessarily expect to be taken seriously as accurate representations of hens’ actual living conditions. Nor does the text necessarily give the consumer any solid evidence about the connection between the egg in the carton and the actual facility where the hen laid the egg:

From free range hens fed a vegetarian whole-grain diet.* [Tick boxes show:] Free Range Hens Fed a Vegetarian whole-grain diet that contains no animal by-products*; Good source of Folate, Vitamin B12 and Vitamin E; A source of Omega 3 and Lutein.

*Our hens are free to roam our paddocks and therefore may consume natural food sources other than the vegetarian feed as they forage. (Borella Eggs, Veggs)

Others do expect to be taken as accurate photographic evidence of the living conditions of the hen, its outdoor range and its barn, but still do not provide much detailed evidence.¹³

The happy hens of Manning Valley Free Range Eggs are free to roam as nature intended on open pastures producing premier eggs under natural Australian conditions. The real currencies of the future [trademark], clean earth, air and water are found in abundance on properties in NSW, so we can guarantee that these eggs are produced in the most natural feeding environment possible. (Manning Valley Free Range Eggs)¹⁴

Close examination of this statement (and many of the others) shows how unconnected with reality it is: the reference to “natural Australian conditions” appeals to consumers’ wish to be patriotic or buy food that has not travelled far and is subject to Australian quality and safety standards, not to any particular need of the chicken.¹⁵ The frequent references to sunshine and open pasture on this and the other cartons is puzzling since chickens are descended from jungle fowl and feel very vulnerable on open pasture preferring the cover of low trees and somewhere to roost. Indeed a large project of Australia’s main research facility for poultry

¹² See <http://www.ecoeggs.com.au/certification/>

¹³ The following brands fit into this category: Field Fresh (information about audit available on their website), Hunter Valley (Farm Pride) and Manning Valley (quite a lot of information on website. They have 5 farms with photos and webcam for one of them. Their website also tells us that they run 1500 to 7500 birds per hectare on average: <http://www.manningvalleyeggs.com.au/our-farms/certification.html> at 13 November 2012).

¹⁴ The Manning Valley website tells us they have four farms and provides pictures of them and webcam (with a couple of minutes access to move the camera around) for one. There is some further information about the farms on the website including the statement that “On average we run 1500 to 7500 a hectare but a lot of the farms have more available to them if needed, it is more about making sure the paddocks have grass and are well maintained. The birds love to eat grass, scratch around, dust bath and flap around.” See <http://www.manningvalleyeggs.com.au/our-farms/certification.html> last accessed 29 November 2012.

¹⁵ Since fresh eggs cannot be imported into Australia, this should not be surprising and even a very large company, such as Pace, can still be a private family owned company.

production is concerned with working out how to get more “free range” chickens to actually utilise their ranges by providing more shade, trees and other ground cover so that they feel safe and have places to perch (Poultry Hub 2010). Sunshine and pasture relate more to Western people’s cultural associations of egg laying chickens with old fashioned, small scale children’s story book farms that pasture the animals during the day and lock them in a barn at night, and with the idea of the farmers’ wife and children collecting the eggs in the morning, as the sun rises, for breakfast.

Two brands in this category provided more detailed and specific evidence on the carton, including logos showing in one case Australian Certified Organic accreditation and in the other case Free Range Farmers Association and Humane Choice accreditation. These two brands (Clarendon Farms and Family Homestead) were supplied by smaller producers not by any of the six major or emerging suppliers. They were each only available in selected stores and were priced as premium brands far above most of the other brands for sale. For example, one stated,

This photo shows how our birds are housed in small portable houses that are towed over the pasture. This helps protect the flock against disease avoiding the use of antibiotics and drugs. The birds are never confined in the houses. They are protected against predators by flock guardian dogs and electric fencing. The large outdoor feeders contain grain grown on other organic farms. [And under the ACO logo:] This is your guarantee that no antibiotics, drugs, hormones, artificial fertilisers, pesticides, synthetic or Chemical feed additives have been used in the production of these eggs. Sound regeneration farming practices are used and the hens are never confined.” (Clarendon Farms, Organic Free Range Eggs)

A third category of labels show photos of eggs in proximity to grass or straw – as if the eggs were laid in a nest or even on the pasture. These are generally fairly basic cartons with little information and the Coles and Woolworths private labels all fit into this category. The Woolworths Select brand includes some basic information about the meaning of free range: “Our Free Range eggs has been laid by hens that are free to roam outdoors during the day and nest in barns at night.” So does McLean’s Run (Sunny Queen): “Our farms have the highest commitment to hen welfare with only 1, 500 hens per hectare – that’s one hen per 6 m²!”. The McLean’s Run website, like all the websites for the three major companies, has minimal specific information but does emphasise that the hens are farmed the old fashioned way with “plenty of good food, fresh air and sunshine”.¹⁶ Overall, little attempt is made to provide solid evidence of animal welfare or the living conditions of the hens. Instead these brands all prominently featured the basic nutritional information applicable to all eggs which have been calculated on average testing (see AECL 2010).

A fourth variation emphasizes pictures of pasture (generally shown in a golden hue) with no photographic representation of eggs or of hens enjoying the pastures. Some do include graphic silhouettes of hens. The shadowy, non-individualised representation of these chickens is probably a reasonable representation of the significance of the welfare of the hen herself in the industrial systems that produce these eggs.

Supermarket Assured Free Range

Both supermarkets’ conditions of supply for eggs (especially for those that carry Coles or Woolworths branding) generally require that they have Egg Corp Assured accreditation, third party auditing and comply with the Model Code of Practice.¹⁷ Nevertheless most of the

¹⁶ <http://www.mcleansrun.com.au/fresh/> last accessed 29 November 2012.

¹⁷ Woolworths standards available via www.wowlink.com.au and Coles standards available via <https://www.supplierportal.coles.com.au/csp/wps/portal> last accessed 29 November 2012. If organic, they must also carry a suitable organic accreditation.

brands we found do not actually display the Egg Corp Assured (trademarked) logo, even though most have presumably paid to join the scheme and be licensed to use the logo.¹⁸ Some (particularly among the text focused group) displayed non-official logos saying things like “accredited free range farm” or “certified free range” (some with a chicken that looks a little like the Free Range Farmers Association logo). They seem to prefer to display a made up, non official logo that emphasises their claim to be free range rather than the Egg Corp’s official logo that evidences a more general quality assurance scheme. This suggests that the egg producers and distributors do not see the Egg Corp Assured logo as a particularly valuable way of differentiating their product – and its “free range” authenticity – for consumers. Instead, Egg Corp Assured is a bare minimum to enable suppliers to put their products on Coles and Woolworths shelves at all, rather than a guarantee of any specific free range claim. Indeed the current auditor guidelines for the Egg Corp Assured scheme do not provide any check of accuracy and stocking density of barn laid or free range claims – they only check for minimum compliance with the stocking density rules for cage systems.¹⁹

As we have seen, a few (premium) brands in the two dominant supermarkets displayed some of the alternative accreditations that are stricter on animal welfare and organic standards. But our research into the brands available in alternative retail spaces²⁰ indicated that a consumer who walks into a specialist organic or wholefoods type store or a farmers market is much more likely to find brands with specific information about production conditions, including accreditation logos, than one who walks into a Coles or Woolworths. In those farmers markets that require all stalls to be staffed by the farmers themselves, the consumer can also ask the farmer directly about the production methods. On the other hand, the brands of eggs available at the independent and smaller supermarkets that compete with Coles and Woolworths, at the urban fresh produce markets (such as Queen Victoria Market in Melbourne), and at mainstream fresh produce stores, were even less likely to display detailed information about production systems than the brands at Coles and Woolworths, and rarely displayed any certification accreditations. Moreover, little or no information is available about how these stores “regulate” what products appear on their shelves, whether they require at least Egg Corp Assured accreditation, and whether they have any standards of monitoring systems for the “free range” claims on the eggs they sell.

The branding and supermarket display of all these eggs currently seems to assume that the consumer will trust the product’s safety, reliability and labelling claims because it is available in one of the two major supermarkets. It is possible – yet not easy – for a member of the public to find information about Coles and Woolworths’ quality assurance procedures for their suppliers on the internet, but they are not advertised to consumers. Nor do the supermarkets clearly display signage differentiating free range from cage eggs and explaining what each means – except in Canberra where legislation requires this.²¹ Once the consumer has stepped into the supermarket they have little ability to use their purchasing power to discriminate between different meanings of

¹⁸ We were able to confirm this for most brands by checking the Egg Corp website. We could not confirm this for Sunny Queen brands as Sunny Queen buys eggs from separately named farms whereas Egg Corp lists by farm, not brand. Moreover some of the least expensive, and least elaborately labeled, brands have very little information or evidence at all, and we could therefore not even confirm that they are Egg Corp Assured.

¹⁹ See Auditor’s Evidence Guide, version 2.4 available at <http://www.aecl.org/egg-corp-assured/become-an-auditor> last accessed 29 November 2012.

²⁰ This part of our research will be published separately and is available from the first author upon request.

²¹ *Eggs (Labelling and Sale) Act 2001* (ACT). This legislation requires that both the packaging and display of eggs for retail sale must indicate the system (cage, barn or free range) used to produce the eggs. The production systems are defined in accordance with the *Model Code of Practice*. Cage eggs must be kept separate from the other eggs on the display and marked in red on the edge of the shelves.

“free range”. Rather, it is the supermarket itself that “regulates” what “free range” does and does not mean by deciding what to stock by reference to their own business model and their calibration of what they think the consumer wants to buy (see Richards et al 2011).

The supermarkets’ regulation of their suppliers focuses more on food safety (meaning safety from immediate contamination and illness), reliability, quality and consistency of supply on a national scale and price, than on the animal welfare, agro-ecological or public health concerns with intense cage production discussed above. (see also Richards et al 2012). Discourse from both supermarkets centres around “affordability” for customers and “economies of scale” (Coles 2010; Gettler 2009; Peddie 2012). The big supermarkets’ greater promotion of free range eggs is hinged upon further concentration and consolidation of the egg industry and further pressure for free range eggs to be produced intensely and on an industrial scale. At present, Coles classifies 10,000 chickens per hectare as “free range,” and a spokesman for Coles has warned that a stocking density of 1500 hens per hectare would make free range eggs unaffordable for many consumers (Peddie 2012). Similarly the Egg Corporation has used the huge growth in consumer demand for free range eggs to justify its 20 000 hens per hectare outside stocking density rule. The Egg Corp points out that the rival 1500 hens per hectare figure “was created in 2001 at a time when the free range egg market was in its infancy (8% market share in 2001) compared to the growth it is experiencing today (25% market share in 2011) and therefore does not represent the reality of the market today and into the future” (AECL 2012a). Their argument is that a much higher stocking density is needed in order to meet demand and avoid prices “soaring” to up to \$12.80 per dozen (AECL 2012a).

This suggests that only eggs produced on a large scale can be stocked at “affordable” prices in Coles and Woolworths. The Egg Corp has accused the supermarkets of slashing prices by reducing the number of egg suppliers and consolidating which brands they stock (White 2009). A Senate enquiry revealed that in the wake of the ‘Milk Price Wars,’ a major egg producer was approached by one of the big supermarkets who they had been supplying, under the implication that eggs were the next commodity to be subjected to such a price squeeze, with the supermarket stating the price they were willing to pay (Senate Economics Legislation Committee 2011).

What Does Supermarket “Free Range” Mean?

The combination of the pressure from Coles and Woolworths as to the price to be paid to producers for “free range” eggs, the cost of the grain for the hen’s feed (set by global commodities markets), and the low standards in the *Model Code of Practice* and Egg Corp Assured scheme set the conditions for what “free range” can and – in order to be commercially viable – must mean.

Most of the “free range” brands available in the dominant supermarkets are laid by hens housed in large barns with little real access to the outside. The scale and density of birds in these intense, industrial “free range” systems, along with the size and number of holes to access outside makes it likely that most birds will remain inside for much of their lives (ACCC 2012). One Australian research study showed that on average on intensive free range farms, only 9 percent of hens actually use the range area (Poultry Hub 2010). This is because they are cramped (sometimes in multi-level barns) to an extent that they cannot physically access the outside or are too afraid to go past other hens outside their pecking order to do so. It would be more accurate to label the eggs produced in these facilities as “barn laid” or “barn yard” eggs to indicate that the hens are mostly housed in a barn with theoretical access to a range or yard.

Moreover, with stocking densities of 20 000 hens per hectare (or even 10 000 hens per hectare), the range is likely to be very quickly stripped bare. Even if the hens went outside, they would access little or no green grass and would feel frightened by the lack of shelter and overhead cover. Their primary food is the grain based feed provided to the egg producer from

a commercial supplier usually fortified with meat meal (to ensure the protein levels necessary for the hens to lay the number of eggs required to make them profitable) and with colourants (to ensure the bright yellow yolk that might otherwise come from the beta-carotene in the green grass) (see ACCC 2012; Loughnan 2012; Sankoff & White 2009; and Weis 2007). The eggs are probably no more local or fresh because they are free range. Rather, many have probably gone through a long process of storage and distribution due to the concentrated nature of both the suppliers and the retailers.

It is this scale and intensity of farming of layer hens that creates agro ecological and health impacts, not just the cages (Productivity Commission 1998). Cage egg production is particularly cruel to hens, as there is no option of providing foraging space, nor a nest for laying (SCARM 2000). Industrial scale barn and free range systems can, however, feature higher hen mortality due to feather pecking, cannibalism and parasitic disease when farmed at sufficient intensity (SCARM 2000). Good farm management can minimise these outcomes through the right combination of flock size, bird breed and laying system design (SCARM 2000), but the ability to manage animal welfare well in these systems tends to conflict with the need for large scale, intense “factory” farming required to meet the conditions of supermarket supply. The non-cage “choice” presented to consumers in the two major supermarkets might represent a different housing system for hens, but does not necessarily represent a difference in the scale of production, nor in many of the essential features of most layer hens’ lives, nor in the agro-ecological and public health impacts of their farming.

The ACCC’s response to the Egg Corp’s Certified Trade Mark application confirms farming density as a cornerstone issue (ACCC 2012). This does not mean that stocking density is *the* only issue of importance, but rather, that the issue of stocking density cross-cuts many of the other issues. The Egg Corp’s proposed increased stocking density of 20,000 birds per hectare was judged by the ACCC to be inconsistent with consumer perception of free range farming practices since, in the ACCC’s opinion, the term “free range” conveys that birds range for a significant portion of the day, not merely the theoretical possibility that they can range (ACCC 2012). With such densities of birds, there is an increased likelihood of beak-trimming being performed; ironic, as it impacts upon birds’ ability to forage, and when such natural behaviours are inhibited, birds are more likely to be inclined towards feather pecking and cannibalism (ACCC 2012). Beak- and toe-trimming and forced-moulting are not addressed in the Egg Corp’s proposal. The indoor stocking density is the same as that in barn systems (30kg/m²), which when coupled with the likely scenario described above where birds pass much of their time inside, essentially means hens living on “free range” farms under the Egg Corp’s new rules will be living the life of a barn-laying chicken. Other issues identified by the ACCC as potentially conflicting with consumer’s expectations of free range include the fact that the practices of rotating birds to fresh pasture and managing the environmental conditions of the range are only recommended but not required (ACCC 2012).

4. CONCLUSION

Our analysis puts into question whether the supermarkets can provide a “free range” egg choice to consumers that provides a substantially different way of addressing animal welfare, agro-ecological and public health concerns than intense cage production at all. The labelling of some eggs on the supermarket shelf as “free range” suggests there is a clearly more “ethical” choice available to consumers in the dominant supermarkets. In practice, it is not at all clear where the ethical dividing line lies between different (cage, barn and free range) production systems.

The Egg Corp’s (so far failed) proposal to “clarify” – and increase – the stocking density for free range is part of an attempt to provide a very broad and ambiguous definition for “free range” that can stretch to fit “free range” factory farming. The Egg Corp’s quality assurance system (both the current system and the especially the proposed new one) plays into the effort on the part of supermarkets to provide a “new” free range product that coopts and

conventionalises "free range" at a price and on a scale and level of reliability and convenience that keeps egg sales within the mainstream chain of industrial egg production, concentrated marketing and distribution, and supermarket sale (see Guthman 2004). The Egg Corp, representing the egg producers, is particularly focused on making its quality assurance system and logo better known and trusted by consumers (unsuccessfully at present) presumably in order to help producers obtain a higher price premium for "ethical" Egg Corp assured eggs both from consumers and vis-a-vis the supermarkets.²²

The combined effect of the supermarkets' and producers' approach to "free range" is to create a new product category of (industrial) free range for the consumer that diverts attention away from alternative ways of organising the food chain from sun and earth to hen to consumer (Pollan 2006). It focuses attention on the idea that consumers can have a real "choice" with the dominant supermarket system. It distracts discussion away from the possibility that Australian governments should be setting and enforcing higher standards for intense animal factory farming that would socialise the costs of the animal welfare, agro-ecological and public health impacts of egg production and remove the choice of "unethical" eggs all together (see McEwen 2011, pp 1-5; see also Kirby 2010). In particular, it distracts attention away from the ongoing campaign to ban cage egg production altogether, or at least require "enriched" cages (with more space, nests, perches, litter and unrestricted access to a feed trough) as has occurred in the European Union and in some states of the US.²³ It also diverts attention away from the possibility that the retail market can be -- and is indeed being -- reconstructed in such a way that people can obtain eggs at a range of alternative local, organic or wholefood stores, at farmers markets, through exchange at community food hubs or with neighbours and, friends, or from their own backyard chickens, and the possibility or that some people might choose to eat fewer or no animal products when they understand the full social, environmental and health costs of intense factory farming (Safran Foer 2009).

²² In its information for members about the new ESA, the Egg Corp says, "The new national egg QA Standard will be your passport to the market in the future. Whilst the current QA program has had limited market exposure, the new egg QA Standard will be extensively promoted to consumers as being the eggs of choice on shelf." From *Developing a new standard for Australian eggs: your questions answered*, available at <http://www.aecl.org/egg-corp-assured> last accessed 29 November 2012.

²³ The European Union Directive 1999/74/EC gave producers and member states from 1999 until 2012 to transition to alternative systems. From January 2012 "non enriched cage systems" are completely prohibited. Producers may use "enriched cages" (where each hen has at least 750 cm² of cage area, nests, perches, litter for pecking and scratching, and unrestricted access to a food trough) or a non cage system (with nests, perches, litter for pecking and scratching, and stocking density does not exceed nine laying hens per square metre of useable area indoors). There is no requirement for outdoor access, but there are some provisions for access to and conditions of open runs where they are provided. Switzerland had already banned battery cages in 1992.

California passed legislation in 2008 requiring the phasing out of production of eggs via battery cages by 2015, and in 2010 it legislated to prohibit the sale of battery cage eggs in California. Michigan and Ohio, both large egg producing states, have passed similar legislation phasing out battery cage production. Massachusetts, Washington, Arizona and Oregon are considering such legislation. In 2011 the Humane Society of the United States and United Egg Producers (the egg industry association) jointly drafted a Federal bill that would ban battery cages and allow only enriched cages or non cage systems: HR 3798/S 3239. See <http://www.eggbill.com> (accessed 30 October 2012). The legislation would also require every egg carton sold to include information about the egg production system used.

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Table 1: Summary of Major Accreditation Standards for Free Range Egg Production in Australia

	Australian Egg Corporation Limited's (AECL): Egg Corp Assured (based on Model Code of Practice)	RSPCA Approved Farming: Paw of Approval	Free Range Farmers Association Victoria (FRFAVic) Accreditation²⁴	Humane Society International: Humane Choice	Biological Farmers of Australia: Australian Certified Organic²⁵
Stocking density inside	30kg (approx. 15 birds)/m ²	7 to 9 birds/m ² (raised floor space or not) Recc. max 5000 birds/enclosure	7 birds/m ² Max of 1000 birds/house	5 birds/m ² Max of 2500 birds/house	Max of 1500 birds/house
Stocking density outside	Current: 1,500 birds/ha and higher where rotation ²⁶ Proposed: max of 20,000 birds/ha	2,500 birds/ha (rotation) 1,500 birds/ha (no rotation)	750 birds/ha	1500 birds/ha	16kg (approx. 7 birds)/m ²
Allows parallel production systems on same farm?	Yes. Standards allow cage, barn or free range, and accreditation does not differentiate between them. Up to producer and retailer to ensure label is not misleading.	Yes. Approve both barn and free range systems but more barn laid eggs accredited. Oppose battery cage eggs.	No	No	No
Groundcover requirement s for ranging area	None	Must be maintained so as to encourage hens to use area, and have palatable vegetation and adequate shelter	Adequate natural ground cover should be maintained	Must have a paddock rotation system in place to prevent nutrient build-up, with minimum 40% pasture cover, and areas must be capable of continued production of vegetation. Also should be shelter and trees in paddock.	Pastured; maintain vegetation levels; resting of pastures for 9 months after each batch of laying poultry; sufficient shade
Beak trimming permitted?	Yes	Only with special permission from	No	No	Prohibited, except in specific cases

²⁴ There is also the Free Range Egg and Poultry Association of Australia who have a separate accreditation system (but few accredited brands for eggs). Their standards have a maximum stocking density of 6-10/m² inside (depending on total number) and do not state a number birds per hectare outside. They allow beak trimming, and do not say whether they allow parallel production systems. Apart from that they are similar to the FRFA and Humane Choice systems.

²⁵ ACO accreditation has the vast majority of organic accreditations in Australia, but some organic eggs have [The National Association for Sustainable Agriculture, Australia \(NASAA\)](#) accreditation which has some different requirements including a 5 per m2 indoor stocking density.

²⁶ See discussion at note 4 above and accompanying discussion.

		RSPCA, and not routine			where permission is sought from ACO
Meat meal in hen feed permitted? ²⁷	Yes	Yes	Yes, but must be heat-treated	Yes, but must be heat-treated	Only prohibited for ruminants, but feed must be organic
Yolk colourant in feed permitted?	Yes	Yes	No	Not specified	Synthetic colouring prohibited
Antibiotics permitted?	Yes	Yes, but not systematically, and under vet supervision	No	Yes, but only for therapeutic purposes, and under vet supervision	Only for therapeutic purposes, and under vet supervision, and then those hens must be removed from the general population and never classified as organic again
Induced moulting permitted? (i.e. withdrawing food to shorten a natural period where hens don't lay eggs)	Yes	No	No	No	No
Accredited brands mostly sold where?	Coles/ Woolworths But many do not actually display the Egg Corp Assured logo on their cartons	Coles/ Woolworths	Farmers Markets/ Organic Stores	Farmers Markets/ Organic Stores	Organic Stores

²⁷ Organic eggs are more likely to come from hens that have been fed a purely vegetarian diet (NASAA allows only up to 2% meat in feed), but they still allow some animal byproduct in the feed.

Table 2: Atypical Behaviours in Caged Hens and their Preceding Conditions

Behaviour	Preceding Conditions
‘Defeathering;’ rubbing up against the wire cage, causing feathers to fall off (potentially trying to emulate ‘dust-bathing’ movements, whereby hens in natural conditions roll on the ground spreading dust over themselves)	Stress; Frustration.
Cannibalism	Little opportunity to use cognitive potential
Feet entangled in or crippled by wire floor	Open wire floor does not allow birds to ever stand flat-footed
Weaker birds trampled or pecked to death by cage mates	Cramped environment without room to move
Weakened bones and broken legs that go unnoticed amidst the mass of birds and go untreated	Inadequate exercise, sunlight; cramped quarters
Birds perish in high temperatures (a regular occurrence in Australia for the past 40 years)	Lack of ventilation in sheds

Sources: Loughnan 2012; RSPCA 2012b; Sankoff and White 2009.

Table 3: Free Range and Organic Egg Brands

Egg Production and Distribution Company	Brand	Marketing Strategy	Accreditation	Place Purchased	Price per Dozen
The Three Dominant Egg Production and Distribution Companies					
Farm Pride	Essential Foods Free Range (featuring George Calombaris)	Focus on Text	AECL	Coles; Woolworths	\$5.99
	Farm Pride Free Range	Happy Hens	AECL	Coles; Woolworths	\$5.49-\$5.99
	Farm Pride Pink Pack Free Range (raising money for breast cancer)	Focus on Text	AECL	Coles; Woolworths	\$5.79-\$5.99
	Hunter Valley Free Range	Happy Hens	AECL	Coles; Organic Grocer	\$5.00-\$5.89 (10 pack)
Pace	Pace Free Range Natural Living	Focus on Text	AECL	Coles; Woolworths; Urban Markets	\$4.79-\$6.40
	Pace Omega 3 Free Range Body	Focus on Text	AECL	Coles; Woolworths	\$5.99-\$6.40
	Pace Organic Free Range	Focus on Text	OFC	Coles; Woolworths	\$8.99
Sunny Queen²⁸	Ellerslie Farm Organic Free Range	Photos of Eggs	ACO	IGA	\$6.19
	McLean's Run Free Range	Photos of Eggs	AECL	Coles; Woolworths	\$5.99-\$6.30
	Organic Egg Farmers Organic Free Range	Photos of Eggs	ACO	Organic Grocer	\$6.50
	Sunny Queen Farms Free Range	Focus on Text	AECL	Coles; Woolworths	\$5.99
	Sunny Queen Farms Organic Free Range	Focus on Text	ACO	Coles; Woolworths	\$6.99-\$7.30
Three Smaller Egg Production and Distribution Companies					
Borella²⁹	Nature's Best Free Range	Happy Hens	AECL	Coles; Woolworths	\$5.79-\$5.99
	Sunshine Farm Free Range	Happy Hens	AECL	IGA; Other small retailers	\$4.29-\$5.99
	Veggs Free Range	Happy Hens	AECL	Coles; Woolworths	\$5.99
H&L Premium	ecoeggs Free Range	Happy Hens	AECL	Coles; Woolworths; Urban Markets	\$5.49-\$6.60 (10 pack)
	Field Fresh Free Range	Happy Hens	AECL	Woolworths	\$3.98 (10 pack)
	Just Free Range Eggs	Photos of Eggs	?	Urban Markets	\$4.49
	Port Stephens Free Range	Focus on Text	AECL	Coles; Woolworths; Urban Markets	\$4.99-\$5.50
Manning Valley³⁰	Manning Valley	Happy Hens	AECL	Coles;	\$5.49-\$6.18

²⁸ Sunny Queen operates mainly as a distributor and marketer, not an owner. Farm names were not available so accreditation to Egg Corp Assured could not be checked.

²⁹ Borella also supplies free range and cage eggs to IGA supermarkets and other small retailers using the Sunshine Farm brand, and appears to be the major supplier to IGAs.

	Free Range Eggs			Woolworths	
An Emerging Egg Distribution Company					
Eggceptional Eggs³¹	Country Pride Free Range	Pasture	?	Urban markets	
	Eggceptional Free Range Eggs	Happy Hens	?	IGA	\$3.29 (6 pack)
	Fryars Kangaroo Island	Happy Hens	Humane Choice	IGA; Urban markets	\$8.00
	Misty Mountain Free Range	Happy Hens	?	Urban markets	\$5.95
	Organigrow Organic Free Range	Focus on Text (Certified)	ACO	Urban markets	\$8.99-\$11.00
	Puriganic Pure Organic Grainfed Hencoop Eggs ³²	Pasture	?	IGA	\$4.39 (6 pack)
	South Gippsland Free Range	Pasture	?	IGA	\$5.49
Private Labels					
	Coles Australian Free Range Eggs	Pasture	?	Coles	\$3.80
	Coles Free Range Eggs	Photos of Eggs	?	Coles	\$3.80-\$4.00
	Woolworths Select Free Range Eggs	Photos of Eggs	?	Woolworths	\$4.49
Alternative Premium and Local Brands Available in Some Coles and Woolworths Supermarkets³³					
	Clarendon Farms Organic Free Range Eggs	Happy Hens	ACO	Woolworths; Organic Grocer	\$8.80-\$8.99
	Family Homestead Genuine Free Range Eggs	Happy Hens	FRFA; Humane Choice	Coles	\$8.89
	Loddon Valley Sunrise Free Range	Pasture	?	Coles	\$5.80

³⁰ Available in ACT and NSW only.

³¹ Eggceptional Eggs acts as a distributor, providing several brands to IGAs and to stalls at urban fresh produce markets like Queen Victoria Market in Melbourne and Paddy's Market and Flemington Markets in Sydney. It may be a supplier of private label products to Coles and Woolworths

³² These are not Organic Eggs, but eggs from chickens kept in cages and fed Organic grain. There was at least one other example of marketing of this same nature which we found.

³³ These two brands of eggs are not available at stores in all locations, and tend to be found in stores located in higher socio-demographic areas.