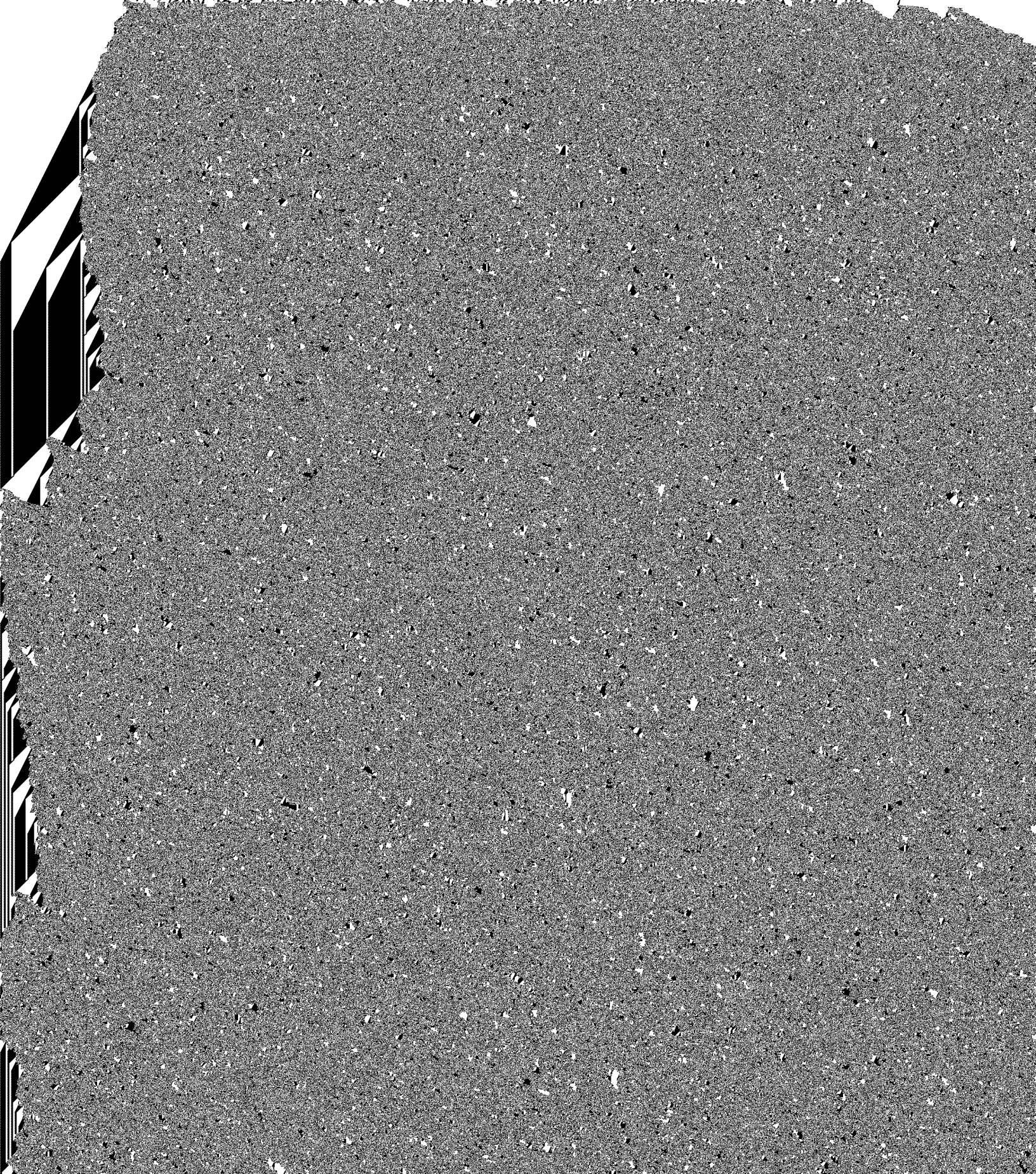
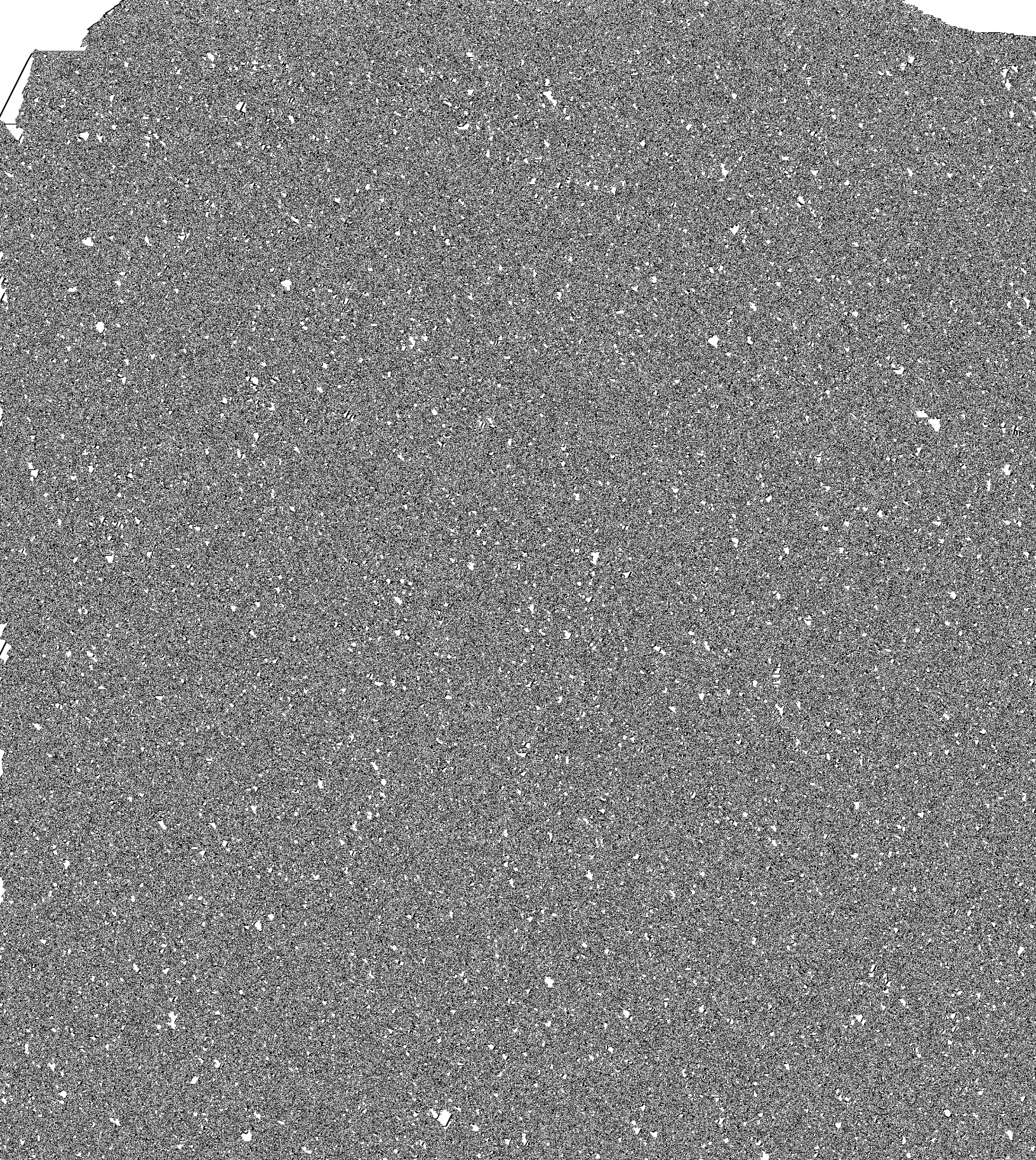


prevalence and recent increase of such misrepresentations demand that FTC go beyond merely

exercising its ad hoc enforcement authority and take general corrective regulatory action by



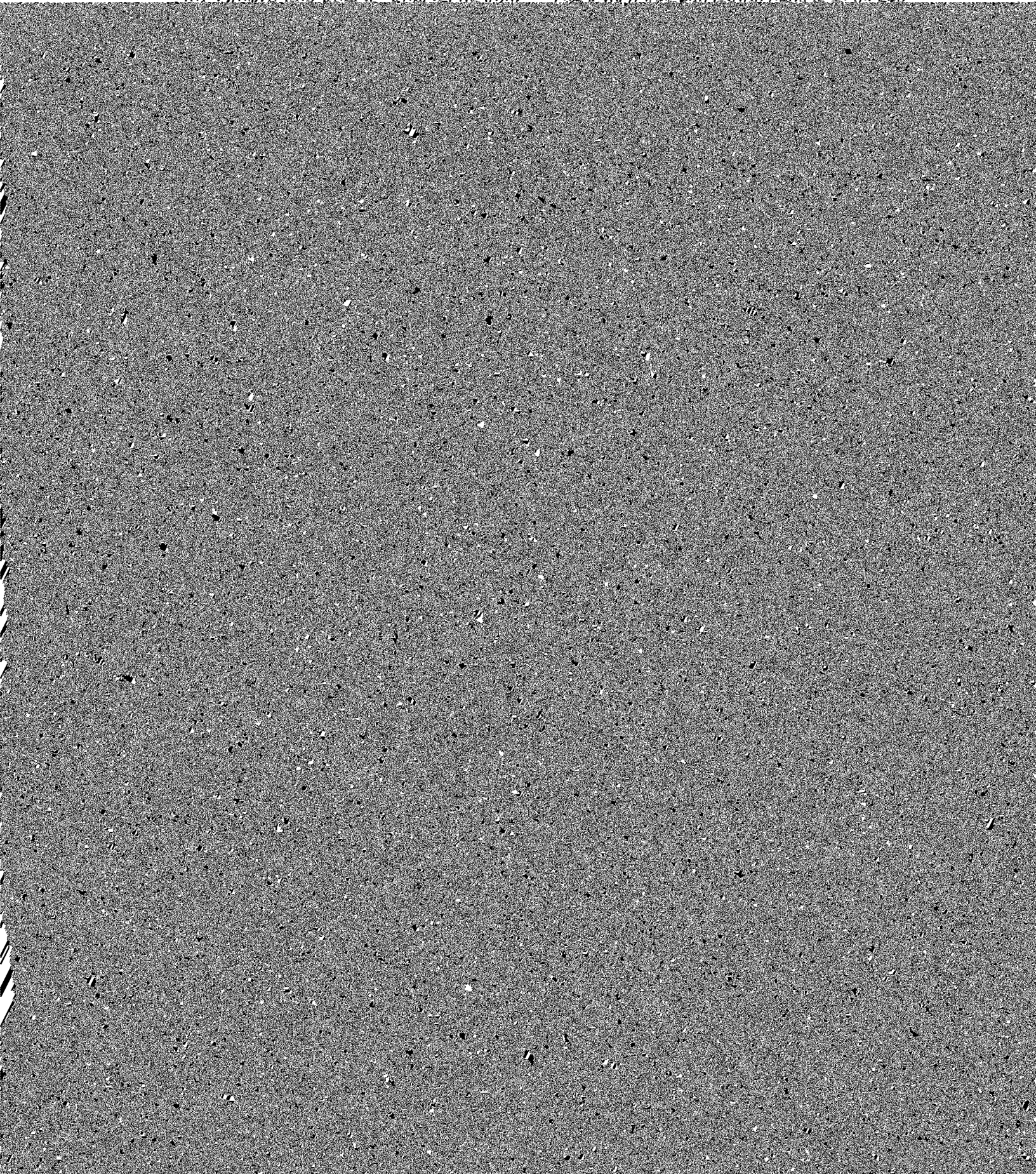
As one would expect, if the current and most common egg production methods are unaccetable to a maiority of consumers, and low knowledge of production methods is common.



eggs. They also state that that their hens are “gently cared for.” That these additional claims are made on the interior of the carton makes the claims no less likely to mislead, as most egg purchasers open egg cartons prior to purchase to ensure that none of the eggs are cracked or

2. Misleading imagery

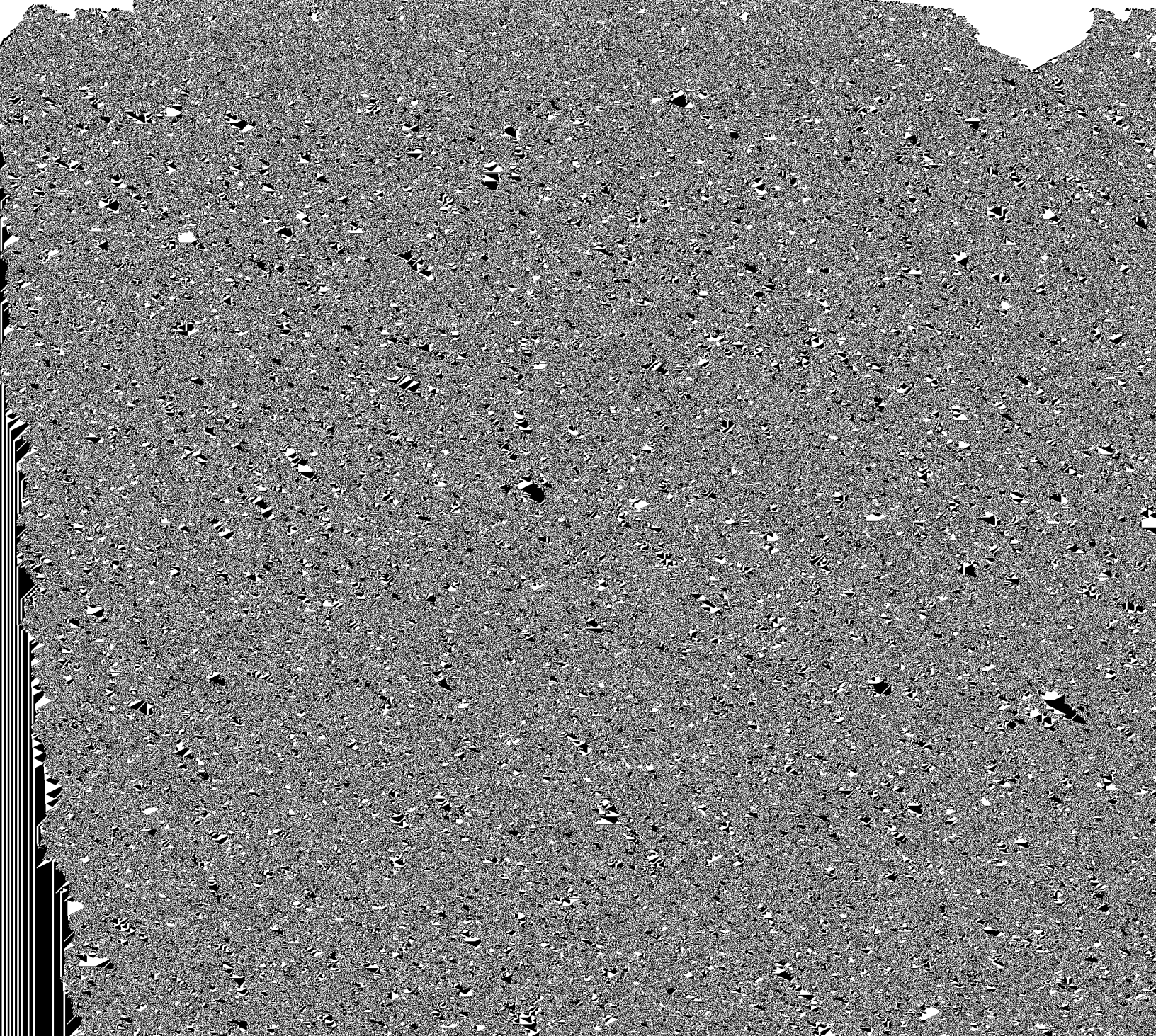
(c) *Olivera Egg Ranch "Ranch Pak Eggs"*. The Ranch Pak egg carton depicts a chicken




Cage-free eggs are credence goods just like the tuna. In both cases, consumers cannot

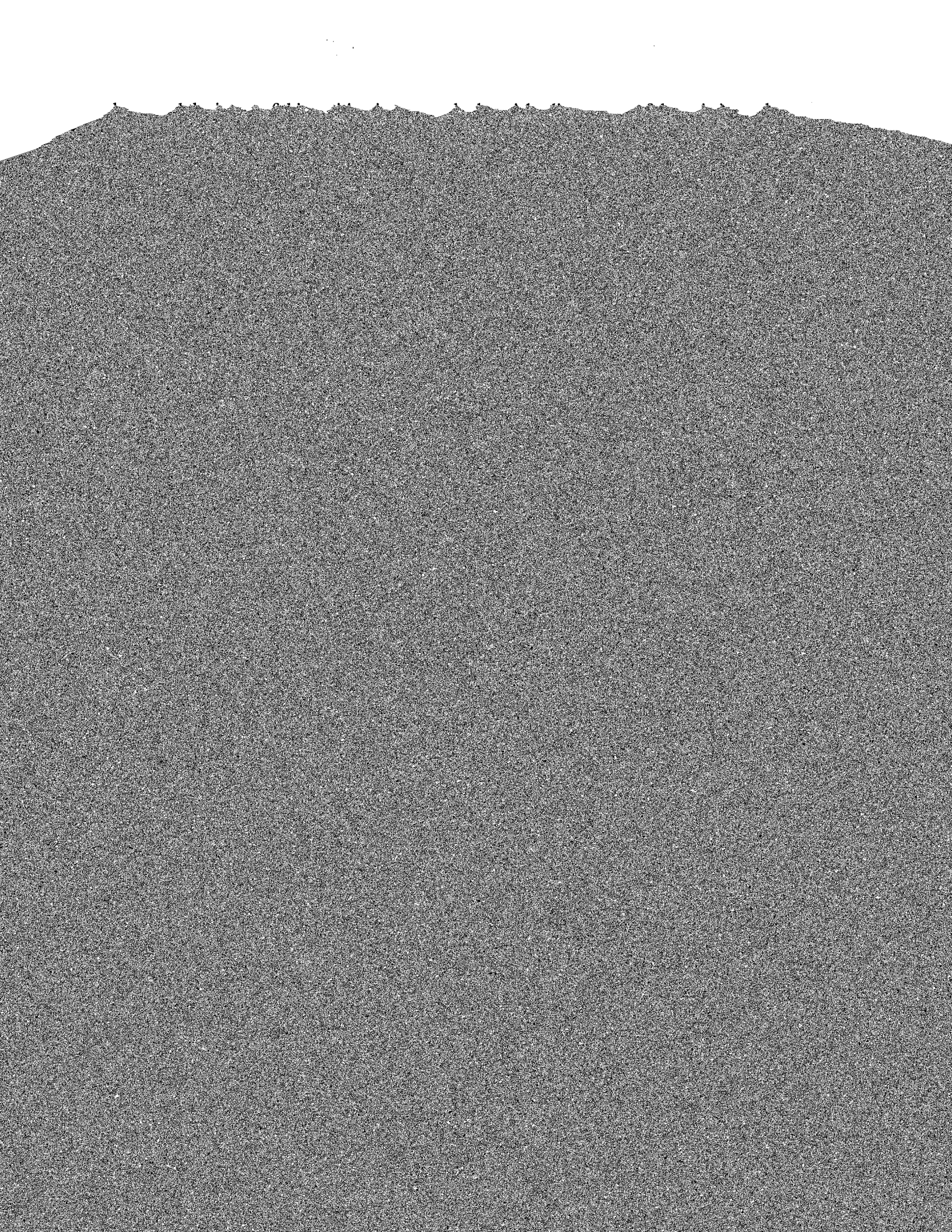
polyunsaturated fatty acids than U.S. commercial eggs.⁶⁶ Based on subsequent studies, Dr. Simopoulos has concluded that “the depletion of the (n-3) [omega-3] fatty acids in Western diets is the result of agribusiness [and] modern agriculture.”⁶⁷ The traditional Mediterranean diet, with its much lower intake of (n-6) fatty acids and higher intake of (n-3) fatty acids, has been shown to reduce the risk of cardiovascular disease and cancer.⁶⁸ Therefore, eggs rich in (n-3) (Omega 3) fatty acids, which have been shown to come from pastured free-range hens, have been

scientifically proven to be nutritionally superior to those from caged hens.



Because the mislabeling of eggs prevents consumers from making informed nutritional decisions, FTC must also implement the regulations requested in this Petition in order to fulfill its mission of ensuring the validity of health claims.⁸⁶ Misleading claims and images falsely





provisions¹⁰³ and the widespread use of misleading express and implied production method claims on egg labels as described above.

G. USDA's Process Verified Program (PVP) Creates a Weak, Ad Hoc and Inconsistent Production Method Labeling Regulatory Scheme and Actually

has had certified through DVD 107 Producers that are members of DVD include producers of

setting forth a consistent set of objective criteria for evaluating the accuracy of the production

