



21 October 2020

Hannah Ransom
Senior Analyst
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By Email: hannah.ransom@accc.gov.au

Dear Ms Ransom,

RE: FODDERFED CERTIFICATION TRADEMARK APPLICATION - 2078679

I refer to your email communication of 6 October 2020.

Firstly, thank you for the notification regarding the submissions received by your office regarding AUS-MEAT's application. It is assumed that this notification indicates that the period for further submissions is now closed.

In relation to the submissions, it is noted that of the three (3) submissions, Cattle Council of Australia (CCA) is fully supportive of AUS-MEAT's application with the remaining two (2) being NSW Farmers and an undisclosed State Department of Agriculture, having expressed a degree of concern. It is noted that these concerns are broadly in relation to the definition of fodder, consumer perceptions of fodder and the minimum 30-day feeding period.

BACKGROUND:

The development of the Fodder Fed Standard has been undertaken by AUS-MEAT on behalf of the Australian Meat Industry Language and Standards Committee (AMILSC). The AMILSC includes representation from the Australian Meat Industry Council (AMIC), Australian Lot Feeders' Association (ALFA); Cattle Council of Australia (CCA); Sheep Producers Australia (SPA); Australian Supermarkets and Independent Retailers (ANRA) and the Department of Agriculture, Water and the Environment (DAWE).

The AMILSC is responsible for the development, approval and maintenance of standards for trade description through the *Australian Meat Industry Classification System* (AUS-MEAT Language) and the AUS-MEAT *National Accreditation Standards* for AUS-MEAT Accredited Enterprises (AUS-MEAT National Accreditation Standards). Under these arrangements, the AMILSC sits in its capacity as an Advisory Committee to the AUS-MEAT Board.

In 2017, after extended industry discussion the AMILSC approved the *Animal Raising Claim Framework For Beef Production Systems In Australia* (ARC Framework) to define raising claims made in the Trade Description or export documentation about the animal or supply chain specifically relating to Animal Husbandry conditions, feeding, handling, drug treatments and/or geographical references. The ARC Framework is designed to protect the integrity of the AUS-MEAT Language and



the sale, distribution and export of Australian Beef. The ARC Framework includes well recognised claims in relation to Grain Fed (certified), Pasture/Grass Fed, Free Range, Organic, Raised with Hormonal Growth Promotants, Raised without Antibiotics, Raised without Sub-Therapeutic Antibiotics, Never Ever 3, Natural, Beef and Fodder Fed (Certified and non-certified).

The development of the Fodder Fed raising claim was in recognition of the requirement for an accurate definition of the common feeding practices for cattle that did not meet the Grain Fed and Grass Fed criteria. The term “Fodder Fed” was incorporated into the suite of raising claims to acknowledge production systems using both grass and grain/fodder.

A copy of the ARC Framework has previously been provided to ACCC (refer correspondence 27 October 2017), at which time the AMILSC had requested that the the ACCC consider the document when assessing all CTM Trademark Applications for Beef Production Systems in Australia. A copy of the current *Animal Raising Claim Framework For Beef Production Systems In Australia* is attached.

The subsequent development of the Fodder Fed Rules and Standards (Fodder Fed Rules) as submitted to ACCC as part of this CTM application, provides a baseline for verifiable “truth in labelling” claims across industry production systems.

The Fodder Fed Rules takes in account a broad application of feeding regimes including but not limited to systems such as the Ceres Agricultural Company Pty Ltd CTM (Ref: 1839112) which was approved by ACCC in 2018.

RESPONSE TO ISSUES:

The following is provided in response to the specific questions identified in your email communication:

(a) definition of fodder

The definition of the term fodder referenced in the Fodder Fed Rules is as defined within the ARC Framework:

Fodder is a type of animal feed and is any agricultural foodstuff used specifically to feed domesticated livestock. Fodder refers particularly to food given to animals (including plants cut and carried to them), rather than that which they forage for themselves (called forage). Fodder includes hay, straw, silage, compressed and pelleted feeds, oils and mixed rations, and sprouted grains and legumes (such as bean sprouts, fresh malt, or spent malt).

Types of fodder include conserved forage plants (hay and silage), compound feed and premixes, often called pellets, nuts or (cattle) cake, crop residues (stover, copra, straw, chaff, sugar beet waste), freshly cut grass and other forage plants, molasses, seaweed, seeds and grains, either whole or prepared by crushing, milling, etc., sprouted grains and legumes, yeast extract (brewer's yeast residue), native green grass, bran, oilseed press cake (cottonseed, safflower, sunflower, soybean, peanut or groundnut), green maize, green sorghum and leaves from certain species of trees.

A limited review of various reference sources (refer Table 1) demonstrates that the term is commonly associated with a broad definition. With consideration to the broadness of definition cross the various references quoted, the definition within the ARC Framework provides additional clarification. Notwithstanding it is acknowledged that the definition remains relatively wide-ranging and this is due to the fact that a wide range of feed type is commonly used to supplement or finish animals as part of this production system.



As correctly highlighted in the submissions not in favour of this CTM, fodder is mostly used on broad acre farms, as a supplementary feedstuff as opposed to intensive feedlot operations.

It is essential to highlight that the Fodder Fed Rules are not feedlot focused nor seeking to impact established grass fed and grain fed standards but provide a structured process (through the Framework) for primary producers to have this common “middle ground” feeding system recognised. The Fodder Fed program is not only in relation to what is being fed but also the production system: being a mixture of access to grass as well as supplementary feed.

The absence of a defined raising claim for the legitimate and common production system that resides between grain and grass-fed systems (as defined in the ARC Framework) has the potential to undermine the well-established premium grain and grass-fed standards.

(b) consumer perceptions of fodder

Through the ARC Framework, the industry has defined attributes that support raising claims for grain and grass-fed production systems. The ARC Framework is designed to protect the integrity of the Australian Beef industry by providing clear guidelines in relation to eligibility for a range of production raising claims with domestic and export markets. By default, the ARC Framework underpins and protects the well-established grain fed and grass-fed claims; being a concern identified by two (2) of the respondents.

Contrary to some of the concerns identified, in relation to Grain Fed Beef - the Fodder Fed Rules are not aimed at feedlot production systems. The National Feedlot Accreditation Scheme (NFAS) was established in 1994 to underpin the integrity of Grain Fed Beef within Australia. The NFAS program is owned and managed by AUS-MEAT on behalf of the lot feeding industry. In this capacity, the development of the Fodder Fed program will not impact the integrity of the NFAS program, nor the grain fed standards.

In terms of the of the Pasturefed Cattle Assurance System (PCAS) – again the Fodder Fed Rules is aimed at protecting the grass fed sector by providing an appropriate market descriptor for beef that has in fact not been exclusively fed grass during its lifetime. This is exemplified by the fact that CCA (as the owners of the PCAS program are supportive of AUS-MEAT’s CTM.

The ARC Framework prescribes that *“Cattle are not confined for the purposes of feeding and are continuously raised on pasture with the addition of prepared feed.”* Contrary to the response from one (1) of the respondents, the Fodder Fed Standard does not make any representation that fodder fed usage is exclusive to the feedlot sector and it is unclear how this confusion has arisen.

The need to protect the public’s trust in the well-established grass fed and grain fed raising claims is well noted and supported by respondents in their submissions. The development of the Fodder Fed Standard will do just that by ensuring that that there is formal recognition of a common feeding production system that is neither grass nor grain based.

In recognising that the general public has donated monies to purchase fodder for producers in drought affected regions through campaigns such as “Buy a Bale” it is equally important to note that hay and straw (as commonly donated) is not the only type of fodder that is commonly fed to livestock.



(c) *minimum 30-day feeding period*

It is recognised that the 30-day feeding period is relatively brief, however this timeframe was identified as an appropriate minimum period adopted by many producers that supplement their livestock when finishing cattle prior to sale.

Further, this period is consistent with other existing industry approved program feeding periods including Grain Fed Finished (35 days) for beef through the NFAS; and for the sheep sector through the Livestock Production Accreditation Scheme (LPAS) where the minimum period for Grain Fed Lamb/Hogget (35 days).

It is important to note that the Minimum Standards for Fodder Fed do not make any specific quality claims, rather the minimum prescribed period is aimed at providing a minimum eligibility period consistent with ensuring that livestock under this production system have been managed in a planned and structured manner.

SUMMARY:

The development of the Fodder Fed Rules was completed through the AMILSC following an extensive consultative and collaborative approach. The Fodder Fed Rules provide clear production pathways for 'Truth in Labelling' with the capability to have 'Marketing Claims' traced back and matched to production systems.

In accordance with the ACCC letter to interested parties of 9 July 2020, the ACCC can be satisfied that the CTM meets the criteria required under the relevant provisions of the *Trade Marks Act 1995* to give a certificate approving the registration of the CTM.

The ACCC can be satisfied (a) that the attributes a person must have to become an approved certifier are sufficient to enable the person to assess competently whether the goods covered by the CTM meet the certification requirements, and (b) that the CTM Rules (i) would not be to the detriment of the public, and (ii) are satisfactory having regard to the prescribed criteria in the *Trade Marks Regulations 1995* being the principles relating to restrictive trade practices under the *Competition and Consumer Act 2010 (CCA)*, the principles relating to unconscionable conduct set out in the Australian Consumer Law (**ACL**) (Schedule 2 of the CCA) and the principles relating to unfair practices, product safety and product information set out in the ACL.

In closing, I trust that the above addresses the matters raised and look forward to your favourable consideration of this CTM application.

Yours faithfully,



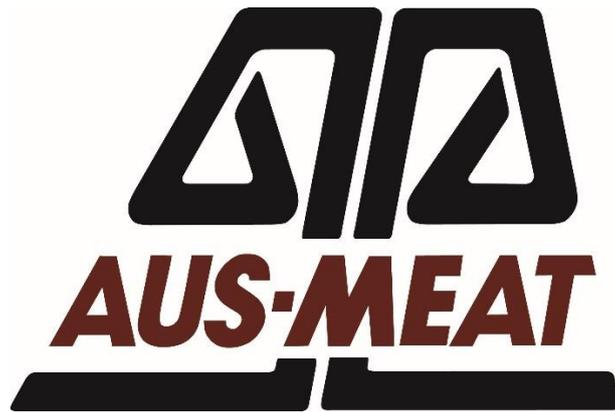
Ian King
Chief Executive
AUS-MEAT Limited

Attach:

Animal Raising Claim Framework For Beef Production Systems In Australia (Issue 2, 20/8/2019)

Table 1: Range of Fodder Fed Definitions

Reference Source	Definition
Collins Dictionary	Fodder is food that is given to cows, horses, and other animals.
Oxford Dictionary of Agriculture and Land Management (UK)	Animal Feed, especially conserved forages fed to ruminant animals. It is usually applied to hay, straw, silage, haylage, straw or other bulk feed rather than concentrated food stuffs.
Australian Macquarie Dictionary (online)	Food for livestock, especially dried food, as hay, straw, etc
ISO Standard - ISO 20588:2019 Animal feeding stuffs — Vocabulary	Forage Fodder - plants or plant parts other than separated grains that are fed to or grazed by domestic animals. Note 1 to entry: Forage may be fresh, dry or ensiled, e.g. pasture, green chop, hay, haylage.
Codex Alimentarius (Volume 2), Pesticides Residues In Food (Second Edition), Section 2 Codex Classification of Foods and Animal Feeds: Food and Agriculture Organization Of The United Nations , World Health Organization (Rome, 1993).	Coarse feed for livestock animals, especially cattle, horses and sheep, such as straw, hay, maize, stalks (stover) etc. e.g. Maize forage: whole green plant, prior to maturity (including the immature or nearly mature cobs). Maize fodder: stover or whole stalks (with ears removed) remaining after the harvest of the mature and sun-dried cobs.



**ANIMAL RAISING CLAIM FRAMEWORK
FOR BEEF PRODUCTION SYSTEMS
IN AUSTRALIA**

Approved By:

Australian Meat Industry Language & Standards
Committee (AMILSC)

Date: 20/08/2019

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INTRODUCTION

An *Animal Raising Claim* is a claim made in the Trade Description or export documentation about the animal or supply chain specifically relating to Animal Husbandry conditions, feeding, handling, drug treatments and/or geographical references.

The *Animal Raising Claim Framework for Beef Production Systems in Australia* has been developed by the Australian Meat Industry Language & Standards Committee (AMILSC). Additional programs and changes to the requirements of this framework may be considered by AMILSC.

GLOSSARY

This glossary contains terms, acronyms and definitions that relate to this *Animal Raising Claim Framework*.

Term or Acronym	Definition
AMILSC	Australian Meat Industry Language & Standards Committee
Certified	The procedure by which an accredited certification body, based on an audit and assessment of a company's competence, provides a written assurance that a company conforms to a standard's requirements. ¹
Company Program	A verification program controlled by an individual processing establishment in accordance with their Approved Arrangements under the <i>Export Control Orders</i> and/or in accordance with the requirements of AUS-MEAT Accreditation.
Department	Competent Australian Government authority
EUCAS	European Union Cattle Accreditation Scheme
FFAS	Fodder Fed Accreditation Scheme
HGP	Hormonal Growth Promotant
LPA	Livestock Production Assurance program
LPA Audit	Audit conducted by AUS-MEAT on behalf of LPA Program Owners.
LPA QA	LPA Quality Assurance Program (incorporating CATTLE CARE and Flockcare)
MSA	Meat Standards Australia
NFAS	National Feedlot Accreditation Scheme
NVD	National Vendor Declaration
PCAS	Pasturefed Cattle Accreditation System
Second Party Audit	An external audit conducted by a company on a supplier to ensure that they are meeting requirements as specified.
Third Party Audit	An external audit conducted by an independent accredited certification body.
Verified	The application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine whether a control or measure is or has been operating as intended. ¹

CONTACT

AUS-MEAT Limited
PO Box 3403
TINGALPA DC QLD 4172

T: 07 3361 9200
W: www.ausmeat.com.au

¹ Source: British Retail Consortium (BRC) Standards, *Global Standard Food Safety*, Issue 7, January 2015.

Raising Claim	Grain Fed (Certified)			Fodder Fed (Certified)	Fodder Fed (Non-Certified)
Standard	Grain Fed (Certified)	Grain Fed Young Beef (Certified)	Grain Fed Finished (Certified)	Fodder Fed (Certified)	Fodder Fed (Non-Certified)
Marketing Claim	Grain Fed (GF) (Certified)	Grain Fed Young Beef (GFYG) (Certified)	Grain Fed Finished (GFF) (Certified)	Fodder Fed (FF) (Certified) (e.g. Corn Fed, Grain Assisted, Cereal Finished, etc.)	Fodder Fed (FF) (e.g. Corn Fed, Grain Assisted, Cereal Finished, etc.)
Production System	Feedlot only Finished on grain ration in accredited feedlot	Feedlot only Finished on grain ration in accredited feedlot	Feedlot only Finished on grain ration in accredited feedlot	Finished on Fodder with access to pasture OR Finished on pasture with access to Fodder	Finished on Fodder with access to pasture OR Finished on pasture with access to Fodder
Diet	Formulated ration only (for finishing phase)	Formulated ration only (for finishing phase)	Formulated ration only (for finishing phase)	Pasture/grass diet with access to additional fodder diet	Pasture/grass diet with access to additional fodder diet
Program	NFAS	NFAS	NFAS	FFAS or equivalent* <small>* Denotes equivalency subject to approval by AUS-MEAT</small>	<i>LPA and Company Program</i> May be subject to approval by AUS-MEAT.
Certification or Program Approval	Achieve NFAS standards NFAS Declaration (Form A)	Achieve NFAS standards NFAS Declaration (Form A)	Achieve NFAS standards NFAS Declaration (Form A - modified to include GFF)	Achieve FFAS Standards, equivalency or approval of Company Program Declaration (Livestock Sourcing Declaration)	Achieve FFAS Standards, equivalency or approval of Company Program Declaration (Livestock Sourcing Declaration)
Minimum Audit Requirement	Third party audit (Annual)	Third party audit (Annual)	Third party audit (Annual)	Third party audit. Frequency determined by: (a) Company Program Requirements; and/or (b) Market Access Requirements.	Second party audit. Frequency determined by: (a) Company Program Requirements; and/or (b) Market Access Requirements.
Definition	NFAS Rules & Standards of Accreditation Verified through a robust compliance and auditing program	NFAS Rules & Standards of Accreditation Verified through a robust compliance and auditing program	NFAS Rules & Standards of Accreditation Verified through a robust compliance and auditing program	Fodder is a type of animal feed and is any agricultural foodstuff used specifically to feed domesticated livestock. Fodder refers particularly to food given to animals (including plants cut and carried to them), rather than that which they forage for themselves (called forage). Fodder includes hay, straw, silage, compressed and pelleted feeds, oils and mixed rations, and sprouted grains and legumes (such as bean sprouts, fresh malt, or spent malt). Types of fodder include conserved forage plants (hay and silage), compound feed and premixes, often called pellets, nuts or (cattle) cake, crop residues (stover, copra, straw, chaff, sugar beet waste), freshly cut grass and other forage plants, molasses, seaweed, seeds and grains, either whole or prepared by crushing, milling, etc., sprouted grains and legumes, yeast extract (brewer's yeast residue), native green grass, bran, oilseed press cake (cottonseed, safflower, sunflower, soybean, peanut or groundnut), green maize, green sorghum and leaves from certain species of trees.	Fodder is a type of animal feed and is any agricultural foodstuff used specifically to feed domesticated livestock. Fodder refers particularly to food given to animals (including plants cut and carried to them), rather than that which they forage for themselves (called forage). Fodder includes hay, straw, silage, compressed and pelleted feeds, oils and mixed rations, and sprouted grains and legumes (such as bean sprouts, fresh malt, or spent malt). Types of fodder include conserved forage plants (hay and silage), compound feed and premixes, often called pellets, nuts or (cattle) cake, crop residues (stover, copra, straw, chaff, sugar beet waste), freshly cut grass and other forage plants, molasses, seaweed, seeds and grains, either whole or prepared by crushing, milling, etc., sprouted grains and legumes, yeast extract (brewer's yeast residue), native green grass, bran, oilseed press cake (cottonseed, safflower, sunflower, soybean, peanut or groundnut), green maize, green sorghum and leaves from certain species of trees.
Explanation	Cattle are confined with a stocking density of 25 m ² per Standard Cattle Unit (SCU) or less and are only fed a prepared ration for the purposes of production in an NFAS Accredited feedlot.	Cattle are confined with a stocking density of 25 m ² per Standard Cattle Unit (SCU) or less and are only fed a prepared ration for the purposes of production in an NFAS Accredited feedlot.	Cattle are confined with a stocking density of 25 m ² per Standard Cattle Unit (SCU) or less and are only fed a prepared ration for the purposes of production in an NFAS Accredited feedlot.	Cattle are not confined for the purposes of feeding and are continuously raised on pasture with the addition of prepared feed (as per the definition of "Fodder").	Cattle are not confined for the purposes of feeding and are continuously raised on pasture with the addition of prepared feed (as per the definition of "Fodder").

Raising Claim	Pasture Fed / Grass Fed (Certified)	Pasture Fed / Grass Fed (Non-Certified)	Free Range	Organic	Raised Without Hormonal Growth Promotants
Standard	Pasture Fed, Grass Fed (Certified)	Pasture Fed Grass Fed	Free Range	Organic (Certified)	HGP Free
Marketing Claim	Pasture Fed, Grass Fed, Raised on pasture, Finished on pasture (Certified)	Pasture Fed, Grass Fed, Raised on pasture, Finished on pasture	Free Range	Organic	No added hormones, Raised without hormones / growth promotants, No hormones administered
Production System	Paddock only	Paddock only	Paddock only	Paddock	Paddock or Feedlot
Diet	Raised on pasture - Finished on pasture	Raised and finished on pasture (grass). As defined.	All diets	All diets	All diets
Program	PCAS or equivalent	LPA and Company Program May be subject to approval by AUS-MEAT	Free Range	Organic	LPA, EUCAS, PCAS (HGP Free Module) and equivalent commercial verifiable programs
Certification or Program Approval	Achieve PCAS standards PCAS Declaration	Achieve LPA Standards Declaration (Livestock Sourcing Declaration)	Verified	Achieve Organic Certification Standards	Verified/Certified
Minimum Audit Requirement	Third party audit. Frequency determined by: (a) Company Program Requirements; and/or (b) Market Access Requirements.	Second party audit. Frequency determined by: (a) Company Program Requirements; and/or (b) Market Access Requirements.	LPA Audit and Company Program Audit or as specified by importing country requirements	Third party audit (Annual)	LPA Audit or equivalent
Definition	<p><i>See definition PCAS Standard: Eligible Diet</i></p> <p><i>Eligible Diet:</i> Cattle qualifying for Certified Pasturefed must be fed an Eligible Diet which must be derived solely from forage consisting of:</p> <ul style="list-style-type: none"> • Grass (annual and perennial), • Forbs (e.g.: legumes, Brassica), • Browse, • Cereal grain crops in a pre-grain state, • Legumes (such as Lucerne, clover, peas, Leucaena) and brassica (such as beets, kale, turnips). <p>Hay, haylage, baleage, silage and other roughage sources. Paddocks that have had a cereal grain crop harvested may be grazed by eligible cattle provided that over 75% of the paddocks average vegetative regrowth is higher than 21 cm when cattle are first grazed to avoid the risk of cattle gaining access to grain that has shed during harvest. This Eligible Diet must ensue for the lifetime of the cattle, with the exception of milk consumed prior to weaning.</p>	<p>Livestock have had continuous access to graze in open pastures/paddocks</p> <p><i>See AMILSC Definition:</i></p> <p>Cattle will only consume grass and forage for its lifetime, with the exception of milk consumed prior to weaning. Its diet shall be derived solely from feed consisting of grass (annual and perennial), legumes, brassica, browse and cereal grain crops in the vegetative (pre-grain) state. Animals cannot be fed grain or grain by-products. Hay, silage, crop residue without grain and other roughage sources are also acceptable. Routine mineral and vitamin supplementation may also be given to the livestock. If the animal is exposed to ineligible feedstuffs or to ensure the animals well-being at all times during adverse environmental or physical conditions, the producer must fully document the frequency and the supplements provided.</p>	<p>Livestock have not been confined for the purposes of intensive feeding for production and have had continuous access to graze in open pastures.</p>	<p>The term organic is commonly applied to systems that use such terms as organic, bio-dynamic, biological and ecological. The current applicable standard is the <i>National Standard for Organic and Bio-dynamic produce – Edition 3.6 Feb 2015.</i></p>	<p>"Cattle have never been treated with hormonal growth promotants (HGPs). HGP (hormonal growth promotant) means a veterinary chemical product that:</p> <p>(a) Contains a substance that is, or a mixture of substances that are, responsible for oestrogenic, androgenic, gestagenic or thyrostatic activity to enhance growth or production in cattle; and</p> <p>(b) Is registered for use for this purpose in Australia.</p> <p>Other allowable statements include: No Hormones administered, Raised without added Hormones.</p>
Explanation	Cattle are not confined for the purposes of feeding and are continuously raised on pasture / grass.	Cattle are not confined for the purposes of feeding and are continuously raised on pasture / grass.	Cattle have been raised under free range production systems.	Cattle have been raised in accordance with the <i>National Standard for Organic and Bio-dynamic produce.</i>	Cattle have not ever been treated with HGPs.

Raising Claim	Raised Without Antibiotics	Raised Without Sub-therapeutic Antibiotics	Never Ever 3	Natural	BEEF
Standard	No Antibiotics	No Sub-therapeutic Antibiotics	Never Ever 3	Natural	AUS-MEAT Language / MSA
Marketing Claim	No Antibiotics added, Raised without Antibiotics, Antibiotic Free.	Raised without Sub-therapeutic Antibiotics	US Marketing Claim. Never treated with HGP or Antibiotics. Antibiotic Free.	Natural	Beef
Production System	Paddock or Feedlot	Paddock or Feedlot	Paddock or Feedlot	Paddock or Feedlot	All production systems
Diet	All diets	All diets	All diets	All diets	Not Applicable
Program	LPA QA, PCAS (No Antibiotic Module) and equivalent commercial verifiable programs	LPA QA and equivalent commercial verifiable programs	LPA QA, PCAS (HGP Free and No Antibiotic Modules) and equivalent commercial verifiable programs	Natural	Not Applicable
Certification or Program Approval	Verified	Verified	Verified	Verified	Not Applicable
Minimum Audit Requirement	LPA Audit and Company Program Audit or equivalent	LPA Audit and Company Program Audit or equivalent	LPA Audit and Company Program Audit or equivalent	Not Applicable	Not Applicable
Definition	<p>Cattle have never been treated with antibiotics, including low level (sub-therapeutic) or therapeutic level doses, sulphonamides, ionophores or coccidiostats.</p> <p>However, (a) The use of anthelmintics for the treatment of parasites are allowable; and (b) Ionophores used as coccidiostats for parasite control may be used under stated conditions.</p>	<p>Cattle may have been treated with antibiotics on a therapeutic basis only.</p> <p>However, (a) The use of anthelmintics for the treatment of parasites are allowable; and (b) Ionophores used as coccidiostats for parasite control may be used under stated conditions.</p> <p>"Therapeutic" means the use of veterinary medicines for the purpose of treating an existing disease condition or injury (Reference: Australian Veterinary Association).</p> <p>"Sub-therapeutic" means the use of antibiotics in a preventative manner (Reference: Fact Sheet - Antibiotic Use in Livestock Production: Ensuring Meat Safety; (Reference: American Meat Institute).</p> <p>Other allowable statements include: Raised without Sub-Therapeutic antibiotics.</p>	<p>Enterprises considering implementing a Never Ever program:</p> <p>(a) No antibiotics administered at any point in the animal's life;</p> <p>(b) No hormonal growth promotants administered at any point in the animal's life; and</p> <p>(c) No animal by products (Restricted Animal Material) fed at any point in the animal's life.</p> <p>Enterprises may implement the "Raised with no antibiotics" and the "Raised without added hormone growth promotants" programs along with applicable references to the Australian Ruminant Feed ban as described on the Animal Health Australia website.</p> <p>Reference: LPA NVD Declaration</p>	<p>A product containing no artificial ingredient or added colour and is only minimally processed. Minimal processing means that the product was processed in a manner that does not fundamentally alter the product.</p> <p>Minimal Processing: means processes used in the production of meat and meat products and may include:</p> <p>(a) Traditional processes to make meat edible or to preserve it or make it safe for human consumption e.g. smoking, roasting, freezing, drying and fermenting; or</p> <p>(b) Physical processes which do not fundamentally alter the raw meat product and/or which only separate a whole, intact food into component parts such as portioning or grinding.</p> <p>May also include explanatory statements used to establish the basis for describing the meat in this way e.g. 'no artificial ingredients; minimally processed'</p>	No raising claims
Explanation	Cattle have not ever been treated with antibiotics.	Cattle have been treated with antibiotics on a therapeutic basis only.	Cattle have not ever been treated with antibiotics or HGPs.	Cattle raised and processed with minimal production inputs.	Cattle raised under all production systems.

Footnote:

All animal raising claims acknowledge that:

- (a) cattle may have been raised on pasture (grass) for some time in their life cycle;
- (b) cattle may have been confined at some time in their lifecycle for the purposes of husbandry and management activities;
- (c) any product that does not meet the above raising claims can align to the AUS-MEAT Language/MSA Standards for Beef and existing industry programs.