

AUS-MEAT application to register 'Fodder Fed' CTM2078679

Record of oral submission to the ACCC from a state government agriculture department

August 2020

The term 'fodder' is defined very broadly in AusMeat's CTM application. The definition in the Fodder Fed rules is so broad it would effectively encompass everything that cattle are being fed across Australia. Cattle that are grass fed or grain fed, kept on paddock (grazed) or in a feedlot would all be included. The only exclusions are from feeding cattle unique byproducts e.g. bread waste or confectionary waste (which are used to supplement cattle feed in times of drought) or already banned products.

Furthermore 'Fodder' generally implies a plant based diet. In the past, this would have been grazed crop or pasture, silage or hay. Standards Australia and the relevant ISO standard use fodder to mean plants, explicitly excluding grains. The AusMeat definition of 'fodder' is not consistent with these widely accepted definitions.

The AusMeat CTM may mislead consumers because it could result in meat being branded as premium that had been produced using feeding approaches that are not consistent with premium meat products.

'Grass fed' is a premium meat product that Australian consumers value and consequently it sells at a higher price. Cattle producers would generally equate 'fodder fed' with 'grass fed'. Consumers are also likely to associate 'fodder fed' with 'grass fed' and consider it to denote a premium meat product.

As a result, consumers may be misled because the definition of 'fodder' in the CTM rules allows for such a wide range of feed types that all meat currently produced in Australia would meet that definition – regardless of whether it is a premium product or not.

Grass fed meat can still have a high fat content (and hence be considered a premium tasting meat), but it arguably has healthier fatty acids than grain fed meat – which adds to its consumer appeal and higher value. There currently isn't research on the health benefits of fodder fed beef *per se*. However the risk of associating 'fodder fed' with grass fed would lead consumers to assume similar health attributes.

It is also not clear that the 30- day minimum period for 'fodder fed' cattle to meet the requirements to use the CTM is sufficient time for the feed to impact the quality of the meat.