



1364 Ridglands Road  
ALTON DOWNS QLD 4702  
E: [info@eggfarmersaustralia.org](mailto:info@eggfarmersaustralia.org)  
W: [www.eggfarmersaustralia.org](http://www.eggfarmersaustralia.org)

ABN: 16 615 149

16 July 2020

David Hatfield  
Director - Adjudication  
Australian Competition & Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601  
[CTMs@acc.gov.au](mailto:CTMs@acc.gov.au)

Dear Mr Hatfield

Thank you for your letter in relation to the Humane Farm Animal Care, revised certification trademark application.

Egg Farmers of Australia position has not changed. Industry and government are currently working through the *Australian Animal Welfare Standards and Guidelines* process and hope that this will be finalised in 2021.

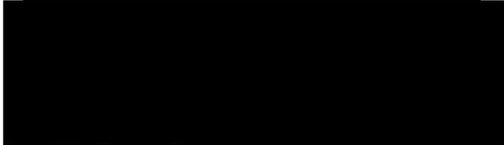
It is not appropriate that Humane Farm Animal Care state they will adhere to the standards and guidelines as if the ACCC approved the trademark this would both undermine the process and there is no mechanism from the ACCC to roll back the trade mark once granted if an organisations trademark does not adhere to the standards and guidelines.

It is also interesting to note that not one of the Humane Farm Animal Care's scientific committee is from Australia, the environment that they are wishing to set standards for with experts that are not from the Australian industry and have not worked with the Australian Government. European conditions are very different to Australia. For example, free range birds in European countries are locked up during winter. This is not carried out in Australia. European systems can not be compared with the climatic conditions of Australia.

A definition in relation to free range hens is legislated under consumer law and this is not reflected in the standards. They therefore do not take into consideration current laws in Australia.

Until the Standards and Guidelines process for poultry has been endorsed and legislated in all states in Australia, Egg Farmers of Australia would not be in a position to consider trademarks from any organisation.

Yours sincerely



**Melinda Hashimoto**

**CEO**

**Egg Farmers of Australia**