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05 May 2020

Ellie Dwyer  
Merger and Authorisation Review  
Australian Competition & Consumer Commission  
Level 17, 2 Lonsdale Street  
Melbourne 3000

By email

Dear Ellie

## **Certification Trade Mark application 1914662 lodged by Humane Farm Animal Care Pty Ltd (HFAC).**

In response to the Australian Competition and Consumer Commission's (ACCC) Initial Assessment, the applicant, Humane Farm Animal Care Pty Ltd HFAC), has made significant and substantive changes to the rules relating to the above Certification Trade Mark (CTM).

The applicant has completely revised the CTM rules for specific use in Australia bringing them in line with Australian standards, guidelines and model codes of practices.

The applicant has appointed Dr Ellen Jongman of the Animal Welfare Science Centre, Faculty of Veterinary and Agricultural Science, University of Melbourne to its scientific committee. She will now act as the contact person in Australia for certification applications, on-site inspections and any dispute matters.

The applicant has assured that it will never require compliance to a standard if it does not meet or exceed the Australian standards, guidelines and regulations. In the unlikely event that an HFAC rule conflicts with an Australian Standard an automatic modification of the rules will take place to ensure compliance with the Australian standards.

The applicant has provided a summary document (Responses to ACCC Initial Assessment and Amendments to Rules) that directly addresses the concerns raised by the ACCC through both substantive responses and amendments to the rules. In addition, the applicant has provided a comparison chart comparing paraphrased versions of Australian rules against HFAC's rules (Aus vs HFAC Welfare Comparison). Both those documents are attached. A completed Certification Mark Rules Checklist is also attached.

The following is a list of all documents attached to this submission.

1. Responses to ACCC Initial Assessment and Amendments to Rules
2. Aus vs HFAC Welfare Comparison
3. HFAC Certification Mark Rules Checklist
4. Inspector Qualifications
5. Policy Manual CTM Rules

6. Beef Cattle CTM Rules
7. Chickens CTM Rules
8. Egg Laying Hens CTM Rules
9. Dairy Cows CTM Rules
10. Pigs CTM Rules
11. Sheep CTM Rules
12. Turkeys CTM Rules
13. Young Dairy Beef CTM Rules
14. Inspector Information Manual
15. Animal Handling Guidelines CTM Rules
16. Humane Euthanasia CTM Rules
17. AVMA Euthanasia Guidelines CTM Rules
18. Inspection Checklist Sheep
19. Inspection Checklist Chickens
20. Inspection Checklist Beef Cattle
21. Inspection Checklist Laying Hens
22. MCP Pigs
23. PCP Buffalo
24. MCP Deer
25. MCP Domestic Poultry
26. MCP Livestock At Slaughtering Establishments
27. MCP Rabbits
28. Australian Animal Welfare Standards And Guidelines For Cattle
29. Australian Animal Welfare Standards And Guidelines For Sheep
30. Australian Free-Range Egg Labelling Standards
31. Australian Industry Standards And Guidelines For Land Transport Of Livestock
32. Australian Standards For Livestock At Sale yards And Depots

Given the significant amendments to the CTM rules to bring them in line with the Australian standards and practices and the appointment of an Australian expert to the scientific committee to oversee the HFAC operations in Australia, we trust the rules of the above certification trade mark are now in order for acceptance.

If you require any further information please let me know.

Yours sincerely



**Kumudu Ramasundara**

Patent and Trade Mark Attorney

