

Jaime Martin
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

30th August 2019

Re: Trade Mark Application 191 4662 lodged by Humane Farm Animal Care

Dear Jamie,

Permission is given to provide this letter online.

The Commercial Egg Producers Association (WA) (CEPA) is the leading representative body for West Australian commercial egg producers. CEPA members produce approximately 75 per cent of eggs in Western Australia using caged, barn and free-range production methods.

CEPA welcome the opportunity to comment on industry concerns with regards to the above trademark application from Humane Farm Animal Care.

The Association has noted the purpose/program of the non-for-profit organisation does not encompass all Australian egg producers.

Majority of Western Australian egg producers are involved in voluntary Quality Assurance Programs that recognised nationally industry standards.

The Quality Assurance programs and welfare guidelines currently used by industry recognise caged, barn and Free-Range production systems whereas Humane Farm Animal Care does not recognise the caged production system, therefore will be unable to model its programs/animal welfare policies to the same standards as the current *Poultry National Standards and Welfare Guidelines*.

By allowing the trademark this will place producers who are unable to access it at a disadvantage and CEPA is concerned that the trademark will have a detrimental effect on consumer trust for the industry as it may cause concern for consumers that the industries welfare standards are not currently being met by producers.

Currently as drafted the program is consider unsuitable as a trademark in Australia and CEPA request that the egg laying standard be removed from the trademark.

Kind Regards,
Ian Wilson



President
The Commercial Egg Producers Association (WA)