



15th of August 2019

Mr Jaime Martin
Assistant Director | Adjudication
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Via e-mail: CTMs@accc.gov.au

**Certification Trade Mark Application No 1914662 lodged by Humane Farm
Animal Care**

Dear Mr Martin

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

The PGA thanks the ACCC for its letter of August 2 asking for the PGA's views on aspects of the application.

As a state farming organization, the PGA has a genuine interest in farm animal welfare standards.

The PGA notes that livestock producers, through levies collected under the *Australian Meat and Live-stock Industry Act 1997* funds the Integrity Systems Company (a wholly owned subsidiary of Meat & Livestock Australia) that delivers the Livestock Production Assurance (LPA) program.

LPA is the Australian livestock industry's on-farm assurance program covering food safety, animal welfare and biosecurity. It provides evidence of livestock history and on-farm practices when transferring livestock through the value chain.

The LPA program comprises seven key areas of standards, some of which contain elements of animal health, treatment and welfare;

- Property risk assessment.
- Safe and responsible treatments of livestock - If animal treatments are not used responsibly, livestock may suffer.
- Preparation for dispatch of livestock – Livestock producers must minimise animal stress during assembly and transport. They must not transport sick or injured animals. They must ensure animals are fit for travel, mustered

Pastoralists & Graziers Association of Western Australia (Inc)

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and assembled with minimal stress. They must make sure the vehicle is clean and well maintained to avoid stress and injury to the animals during transport. They must load animals with care to avoid injury and stress when loading and unloading.

- Biosecurity - Livestock must be inspected regularly for ill health and disease and appropriate action undertaken where necessary.
- Animal welfare - On-farm systems must be implemented to ensure the handling of livestock is consistent with the requirements of the Australian Animal Welfare Standards and Guidelines.

Compliance with LPA is subject to on-line learning outcomes, accreditation, record keeping and auditing.

The Australian Animal Welfare Standards and Guidelines process started in 2005, and as standards and guidelines are written, they are given lawful effect under state and territory legislation and regulation.

In the PGA's view, there is no need for a third party foreign domiciled company to seek to certify a trade mark with the ACCC, when there is already a perfectly adequate, acceptable, functional system of monitored standards for humane food production that is fully funded by Australian livestock producers.

Consequently, the PGA objects to Humane Farm Animal Care's application, and believes it will lead to confusion and duplication both at the production and consumption level when multiple standards exist in parallel.

Failing this, the ACCC should insist that Humane Farm Animal Care use the existing Australian Animal Welfare Standards and Guidelines to support its Trade Mark in Australia.

Yours Faithfully



Chris Patmore

Chairman - PGA Livestock Committee

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