

22 July 2016

Saraj Bhullar  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601  
Via email: [CTMs@accc.gov.au](mailto:CTMs@accc.gov.au)

**SUBJECT: CTM 1749229 – Ceres Agricultural Company – Submission**

Dear Saraj,

I write on behalf of the Australian Meat Industry Council (AMIC) and refer to the ACCC's letter dated 1 July 2016 inviting comment on an application from Ceres Agricultural Company Pty Ltd for a Free Range Pasture Finished certification trade mark (the application).

AMIC is the recognised Peak Industry body in Australia representing the post-farm gate red meat sector including the export and domestic processing industry, smallgoods manufacturers, wholesalers, distributors, boning rooms and independent retail butchers.

AMIC has reservations about the application because the red meat and livestock industry, via AUS-MEAT Limited, is currently determining standardised industry definitions that describe livestock production methods that will enable Australian meat brand owners to raise marketing claims about their products to consumers in an accurate and consistent way.

AUS-MEAT is an industry owned company operating as a joint venture between Meat & Livestock Australia and the Australian Meat Processor Corporation.

AUS-MEAT is cited as the standards body responsible for setting standards for meat for export under Regulation 3 (1) of the Australian Meat and Livestock Industry (Export Licensing) Regulations 1998. The Federal Department of Agriculture Water and Resources has granted AUS-MEAT the responsibility for verifying trade description under the Export Control Act 1982 and the Export Control Meat and Meat Products Orders 2005. AUS-MEAT manages industry standards for trade description through the Australian Meat Industry Classification System or what is termed the AUS-MEAT Language.

The AUS-MEAT Language contains objective descriptions for meat products which are used by livestock producers, livestock processing facilities that service the Australian domestic market and international markets, boning rooms, wholesalers, meat traders and exporters and food service organisations.

Importantly the AUS-MEAT Language has been universally adopted by the Australian and international meat industry as the primary trading language as it provides customers with an accurate way of ordering meat products and ensuring consumers receive what they are purchasing with confidence.

Changes to the AUS-MEAT Language are undertaken on a consultative basis through the Australian Meat Industry Language and Standards Committee (AMILSC) which is facilitated by AUS-MEAT. Members of the AMILSC include meat and livestock industry peak councils and also regulators including the Federal Department of Agriculture Water and Resources.

The Free Range Pasture Finished CTM submission comes at a time when the AMILSC is in the process of determining standardised industry definitions that describe livestock production methods. The purpose of determining a uniform approach is to ensure that consistent trade description is in place in the AUS-MEAT Language to accurately describe meat goods. This will enable meat brand owners to raise specific marketing claims about their products to consumers in an accurate and consistent way.

Standardised industry definitions for livestock production methods such as grain fed, grass fed, combinations of grass and grain fed, free range, antibiotic free, and hormone growth promotant (HGP) free have already been resolved or are in the process of being determined.

The livestock production method described in the application, which utilises a combination of grass and grain feed, has not yet been determined within a standardised industry definition. However the AMILSC is actively working on an appropriate industry definition to describe meat products derived from cattle raised on a combination of grass and grain feed and the corresponding marketing terminology so that it can be accurately described to the consumer.

AMIC also has some reservations about the term 'Pasture Finished'. The term on its own, without any reference to grain, may confuse the ordinary consumer because it may imply that meat derived from cattle produced and certified under the CTM have predominantly eaten, or indeed been raised 100% on a grass or pasture fed diet. The production method described in the application indicates that cattle will have ad-lib access to a grain feed as part of the 'Free Range Pasture Finished' claim.

AMIC believes it critically important that the AMILSC process described above be the primary determinant of a consistent and a legally underpinned approach to meat product marketing claims so that consumers, both in Australia and overseas, continue to maintain confidence in their purchasing of Australian red meat.

Thank you for the opportunity to comment on the application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Greenham', with a stylized flourish at the end.

Peter Greenham  
Chairman - Meat Language, Quality and Raising Claims Committee  
Australian Meat Industry Council