

We are pleased to offer the following comments:

- In part 1.2.32 of the Standards (under 'Requirements relating to handling') it states that electric goads are permitted for moving livestock. We object to the use of such devices and instead suggest the use of substitutes including plastic paddles.
- We would suggest that an addition is made to part 1.2.32 of the Standards ('Requirements relating to handling'), namely to state that dogs should not be permitted in yards.
- We would suggest the addition of a section in the Ceres Standards to address all aspects relating to 'Transport'. This would include recommendations that the transport of the cattle between properties or to abattoirs should consider welfare requirements and ensure minimal stress at all times. The time period from loading to unloading should not exceed 8 hours, and unfit animals should not be transported. Clean water must be available before and after transport, and food provided if animals are held overnight.
- The Ceres Standards must ensure that measures are taken to provide shelter and shade, protecting all animals against the sun, extreme wind and rain.
- We recommend that the Ceres Standards should specify the prohibition of feedlotting.
- We would like to stress the importance of independent third-party auditing for certification schemes. Third-party certifiers supply credibility, information, food safety, and quality assurance to customers. In general, a third-party auditor is more experienced, more highly trained, and has pledged to uphold a particular code of ethical conduct in the performance of the audit. They work for a quality register that also has policies, rules, and regulations to which the auditor must abide. They can also provide a competitive edge over rivals, as certification through a third-party organisation creates a premium on these products. Producers are now increasingly claiming that their produce is of a higher quality than those a consumer could purchase elsewhere. Third-party certification has the benefit of transparency and gives consumers the level of trust that they would expect from an ethical producer. It is much more trustworthy than self-certification, and gives consumers greater confidence. This is key for animal produce in particular where animal welfare, environmental impact, food safety and food quality play an important role in consumer purchasing decisions. The Ceres Free Range Pasture Finished CTM application needs to ensure that independent third-party auditing is incorporated.

Thank you for inviting us to comment on this CTM Application.