

30 August 2019

David Hatfield
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By email: CTMs@accc.gov.au

Dear Mr Hatfield

Certification Trade Mark Application No 1914662 - Humane Farm Animal Care

Thank you for the opportunity to comment on the above application for a Certification Trade Mark (CTM).

As a general comment, the RSPCA supports transparent and effective labelling based on clearly defined and well understood management practices that safeguard the welfare of production animals at all ages and life stages. Those management practices should provide for not just minimum welfare standards but best welfare practices and environments.

We note that the Humane Farm Animal Care standard allows for poultry to be stunned up to 5 seconds following a neck cut, which effectively means cutting the throat of a fully conscious bird. Unstunned slaughter is widely acknowledged and scientifically determined to be inhumane. In relation to slaughter, the RSPCA definition of humane killing is: *'when an animal is either killed instantly or rendered insensible until death ensues, without pain, suffering or distress'*. When killing animals for food (termed slaughter), this means they must be stunned prior to bleeding out so they immediately become unconscious. Any product label implying humane farm animal care and slaughter must ensure that production and slaughter methods are indeed humane.

The RSPCA also believes that any public-facing animal welfare claims made regarding management practices should be verifiable through a rigorous audit process. We note that participants in the program are subject to an annual on-farm audit, and rather than every facility, this may be a sample audit. Given there are so many variables on farm that can impact animal welfare, we would expect a more robust audit process requiring, for example, at least twice yearly on-farm audits.

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RSPCA Australia does not wish to make any further comment at this time, but would like to be informed of the outcome of the ACCC's initial and final assessment.

Yours sincerely



Dr Bidha Jones
Chief Executive Officer (A/g)
RSPCA Australia

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