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To: CTMs
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To whom it may concern,

Historically, many legislative requirements including Animal Welfare Codes, Standards and Audit regimes for the Australian Meat Industry are designed with operations of large scale businesses in mind, and in many instances when applied to small locally integrated supply chains they can have unnecessary burdensome effects on the efficiency and productivity of such businesses

Further, industry strategic direction says very little about established methods for animal welfare on farm and in processing plant appropriate to small locally integrated supply chains, yet in any successful implementation of them they are a necessary condition to outcomes based success and an indication of the utility and necessity for integrated animal welfare activities through chain.

From a pragmatic standpoint, small scale operations are unlikely be reasonably satisfied with the Humane Farm Animal Care approach especially in light of them being coupled with Industry Welfare Standards for Livestock Processing Establishments, both controlled by extreme sets of steps and criteria.

This burdensome effect could manifest itself in confusion, frustration and bitter experiences with auditors trained in somewhat different schools of thought and decision making criteria for animal welfare. Inadequacies in interpretation and application could increase risk of harm to the welfare of animals and employees within certain contexts.

This submission therefore strongly recommends that the Australian Meat Industry with divergent interests and needs must satisfy the ACCC that they are prepared to work together for mutual benefit in order to demonstrate that animal welfare initiatives, large and small, remain voluntary and intending to provide contextual and integrating evidence to ensure the whole is greater than the sum of it parts.

In this way community expectations and market outcomes are likely to be consistently met because they are seen to be equitable for all stakeholders and marketed as exercising a significant animal welfare role.

Stan Allen