



25/5/17

ACCC


23 Marcus Clarke St  
Canberra ACT 2601

To Whom it May Concern,

Thank you for the opportunity to comment on the application to register standards under the name Pastured PROOF - Pasture Raised on Open Fields, Certification Trade Mark Application No:1784876.

██████████ is a ████████ pork producer in Australia. ████████ has delivered high quality, consistent products to consumers for over ████ years. We recognise animal welfare and sustainable production systems as an integral component of our business and strive for continuous improvement in these areas. ████████ support other animal agricultural industries with similar goals.

██████ have a number of serious concerns in relation to the proposed standards. These include misleading consumers, similarities to existing industry free-range standards and insufficient auditing regimes.

1. The title is misleading to consumers. "Pastured Proof-Pasture Raised on Open Fields" implies that pigs are entirely pasture fed, whereas information sourced from business website ([https://www.proof.net.au/feeding\\_pastured\\_pigs](https://www.proof.net.au/feeding_pastured_pigs)) states that "pigs cannot survive on grass alone. Pigs are omnivores and that means that like you and me, they need a varied diet that consists of a nutritionally balanced feed that includes fibre, energy (carbs) and protein along with essential vitamins and minerals" and that the feeding of grain and/or pelleted feed is recommended to ensure pig welfare and growth is not compromised. The standards also allow for non-pasture paddocks in certain circumstances for un-defined periods which is misleading.
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2. The Australian pork industry has a Quality Assurance Program (APIQ). This quality assurance program ensures that Australian pork producers meet legal requirements, industry standards and customer specifications in the areas of animal welfare, environment, food safety, biosecurity and traceability. APIQ includes a module called 'Free-Range Standards'. The standards proposed by PROOF are very similar and almost indistinguishable from those detailed in APIQ-Free Range pig production.
  
3. Finally, a reliable and trusted certification program relies on a rigorous auditing program. The proposed standards are self-audited and external (unscheduled audits) are only conducted on 20% of licensed operators in a calendar year. This is a real concern and increases the risk of non-compliance. In contrast; APIQ certification requires annual external accredited auditing.

Yours sincerely,

