

26 May 2017



Australian Competition and Consumer Commission
Via email: adjudication@acc.gov.au

**Re: Pastured Proof – Pasture Raised on Open Fields – Certification Trade Mark
Application No. 1784876 – Interested party consultation**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Australian Competition and Consumer Commission (ACCC) consultation regarding Certification Trade Mark (CTM) Application No. 1784876. The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

As a matter of principle, the NFF welcomes competition in the market place and advocates for transparent and effective labelling of produce, providing consumers a choice according to different animal welfare standards and conditions. Key to transparent and effective labelling are clearly defined animal management practices and environments. To this end, certification regarding animal welfare needs to be substantiated by a rigorous audit process to ensure consistency across producers. After evaluating the PROOF Certification Rules, the NFF concludes that this is not the case for this CTM application and predicts that the PROOF logo in its current form would misinform consumers.

NFF considers the PROOF logo to be misleading: The words 'Pastured Proof – Pasture Raised on Open Fields' suggest that licensees undergo rigorous auditing. Meanwhile, the PROOF standards do not mandate external auditing prior to operators receiving certification. Additionally, the wording on the logo implies that animals raised according to the PROOF certification are purely grass-fed. [REDACTED]

Moreover, NFF judges the standards put forward in the PROOF Certification Rules to be not entirely consistent with industry best practice. The submissions by Cattle Council of Australia, Sheepmeat Council of Australia and [REDACTED] comprehensively outline why PROOF fails to comply with livestock production standards and auditing.

For further information please contact:

A handwritten signature in black ink, appearing to read "Mark Harvey-Sutton".

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