

Victorian Farmers Federation Egg and Pig Groups Feedback on CTM 1784876 - Pastured PROOF

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. Australia's Agricultural industry supports farms seeking to continuously improve their operations. In the proposed standards the attention to ensuring good environmental outcomes and to encourage continuous improvement in outdoor rotational farming is welcomed.

As currently written, the standards do pose some serious issues, specifically the terminology used and auditing practices suggested. The intention of the standards is certainly worthy however, the PROOF standards fail to meet industry best practice. The standards in their current form are likely to mislead consumers and may lead to some producers gaining a competitive edge for not meeting industry best management practices.

The inappropriate use of the term pasture raised for poultry and pig farms

The standards for pig and poultry farms are of particular interest to us. Both of these species cannot survive on grazing alone. Unlike cattle and sheep, where raised on pasture in most cases, correctly describes both the location and diet of the animal, for the pig and egg industry, this terminology would greatly mislead the consumer.

Within the standards this potential to mislead customers is evident in the following clause in both the Pig and Chicken sections of the standards:

Except from the standards:

1.2. Vegetated cover of the range areas will be managed through paddock rotations and will ensure that all pigs have access to edible forage at all times except in circumstances of extreme weather conditions and extended dry periods that are beyond the control of the operator. At such time, good Lucerne hay or other suitable fodder shall be provided

This clause implies that pigs and chickens will only be given food additional to grazing in the event of extended dry periods, which is never the case in any farming systems. There is clear evidence that if pigs or chickens are left to forage, and not fed appropriately supplementary to that foraging, serious animal welfare issues such as malnutrition will occur.

Within the pig industry the system described in the standards would be classified as an outdoor rotational piggery. This term more accurately describes the system that the standards seek to regulate and for this reason we would recommend that the name and logo of the standards be modified to reflect the farming system being accredited. Leaving the name and logo of the standards unchanged would mislead consumers.

Auditing Process

The standards auditing process is concerning. Under the proposed standards a farm could become a licenced operator without having an auditor visit the farm. For other standards in the pig and egg industries an on farm audit, paid for by the farmer, must be conducted before that farm can be accredited to that standard.

The low percentage of on farm audits carried out each year means that a farm would only have an on farm audit once every five years. This is well below requirements in other industry standards. Other comparable standards include an initial on farm audit and more regular audits once the farm is accredited.

Additionally having suitably qualified and independent auditors undertake auditing for any accreditation standard is important for industry. We are concerned, given the nature of PROOF operations in previous years, that a requirement for independence from PROOF is absent. Auditors in other standards are only paid by the farm which maintains their independence from the accreditation body.

We are concerned that the reduced threshold for accreditation will disadvantage farmers under other standards who must pay for an auditor to visit their farm. We see the low level of on farm auditing in these standards as creating a lower threshold for an accredited farm than is current industry best practice. This therefore could potentially place the long term viability and reputation of industry at risk.

The use of the term freedom

Except from the standards:

3.2 Living conditions must consider the needs of the animal and include;

3.2.1 freedom from stress;

In regards to the requirement that animals be free from stress, if taken literally by any party, these requirements would be unworkable in a farming context.

The complete freedom of stress in any farming system is unobtainable. For example the presence of a predator near the animal can induce stress, as can the process of vaccinating the animals. Stress in these and other circumstances can be minimised by the farmer through good infrastructure and stockmanship, however it cannot be eliminated.

This requirement is an unobtainable aspirations rather than an achievable standard. If this requirement remained as written in the PROOF standards it would mislead any consumers. An appropriate alternative would be to mandate minimising stress to animals.

Conclusion

Once again thank you for the opportunity to provide you with feedback. We have concerns around the name, auditing practices and some content of these standards. Our concerns mainly stem from the potential for consumers to be misled. Additionally it is our intention to ensure all standards within both the pig and poultry industries are comparable in order to allow consumers to judge each standard fairly. For these reason we object to the standard.

As the standards currently stand we cannot support their certification due to the potential for consumers to be misled and to create a lower threshold for an accredited farm than is current industry standard.

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