



Australian Chicken Meat
Federation (ACMF) Inc

27 July 2015

Secretariat
Certified Trade Mark applications
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

**RE: ACMF submission on PROOF - Pasture Raised On Open Fields - Certification
Trade Mark Application No 1635381**

We refer to your letter dated 29 June 2015 inviting comment in relation the "PROOF – Pasture Raised on Open Fields" certification trade mark application (PROOF CTM). We welcome the opportunity to provide comment on this application.

The Australian Chicken Meat Federation (ACMF) is the peak coordinating body for participants in the chicken meat industries in Australia. Good bird welfare and health outcomes are critical to the sustainability of the chicken industry.

The ACMF wishes to raise the following issues and concerns with respect to the PROOF CTM insofar as it relates specifically to chickens raised for their meat:

1. The term "PROOF" is misleading

Consumers might be impressed with the term "PROOF" because they understand it to mean that the program is independently audited. However, the use of the term may lead them to incorrectly conclude that it is the only certification or quality assurance scheme available which is independently audited. The clear inference from the use of the term "PROOF" is that meat chicken products accredited under other systems are not "proven" and/or do not carry the imprimatur of the ACCC.

While it may be clear to some consumers that "PROOF" is an acronym for "Pasture Raised On Open Fields" (this is addressed separately below) this is unlikely to detract from the immediate and primary message being conveyed: that being that *only* those meat chickens bearing the PROOF mark meet appropriate standards of husbandry and care, whereas the term does not deserve any greater credibility or notion of integrity than any other existing independently audited CTM or quality assurance schemes that operate in the sector.

Level 7 122 Walker Street, North Sydney NSW 2060 | PO Box 579, North Sydney NSW 2059 |

T: 02 9929 4077 | F: 02 9925 0627 | www.chicken.org.au | acmf@chicken.org.au | Chook Infoline: 1300 424 665

Furthermore, the phrase "*pasture raised on open fields*" may convey to consumers that the meat chickens bearing the PROOF mark have been raised on a diet that is predominantly pasture-based. This will not be the case, as the birds will prefer to consume the vast majority of their diet as the offered mixed feed – indeed, if they failed to do this, then their welfare would be seriously compromised, and the proposed standards (7.2 and 7.2.1) that relate to meeting the nutritional needs of the birds and maintenance of birds in good body condition are unlikely to be met.

2. Comments on the standards

The PROOF CTM standards are inadequate in that do not cover all factors that significantly impact the welfare of chickens, whereas the consumer might expect that they do. In particular, that they do not adequately address the biosecurity risks (and subsequent bird health risks) presented by allowing chickens outside access. We are particularly concerned about the statement in the Standards under "*5. Range Management*" that "*5.8. Birds shall be encouraged to spend time outdoors with adequate shade and shelter, easy access to water and feed and protection from real or perceived threat of predation*". This appears to imply that feed (as opposed to pasture) and water will be provided on the outdoor range. Provision of feed and water on the range poses a significant biosecurity risk to the flocks where such a standard is adopted, as well as to the entire poultry industry. Feed and water on the range will encourage wild birds, including waterfowl, to frequent the range, significantly increasing the risk of disease spill-over from wild birds to these poultry flocks, either through direct contact between the wild birds and the poultry, or through contamination of the range with their droppings. Our greatest concern in this respect is avian influenza (the primary mechanism of spread of which is through wild birds), although other endemic diseases such as fowl cholera are also of concern in this respect. Feeding birds on the range also invites rodent activity, which also increases the risks of spread of disease agents and pathogens to flocks.

We note that the standards do not require that the birds be allowed outside until they are sufficiently feathered. **This is in line with other certification systems and industry best practice.** Young chicks are not adequately insulated until they have developed sufficient feathers (which generally occurs somewhere between the ages of 20 and 28 days of age) and therefore require a high level of protection against exposure to temperatures which lie outside a fairly narrow band. To allow them outside access prior to this stage of development will significantly impact on their welfare and result in losses due to bird chilling in particular. Additional to this is the significant risk of predation (particularly by crows and birds of prey), when birds are smaller. This is recognised in the PROOF CTM standards.

We also note that standards do not appear to require that birds be 'forced' to go outdoors or that they require the birds to be locked outside, even once they are sufficiently feathered. The standards allow the birds to go outside (eg "*1.1. All animals are able to range freely in open fields or paddocks***") and they seek to "encourage" the birds to spend time outside (standard 5.8). **This is both appropriate and in line with other certification systems for meat chickens and industry best practice.** To force birds outside, or to lock them outside, would likely expose them to significantly greater welfare risks due to predation and exposure to the elements.

The PROOF CTM standards mandate that the chickens *must* have access to the outdoor range areas *every* day, for a minimum of 8 hours each day, once they are sufficiently feathered. This would require the chickens to have access to the outdoor range area regardless of animal welfare or biosecurity risks, including for example in extreme weather, if there were a predator on the range, or if there was an outbreak of avian influenza in the vicinity of the farm. We do not support approval of a CTM if it promotes unsafe animal husbandry practices.

In many areas, the PROOF CTM standards (or at least the outcomes they on the surface appear to strive for) are similar to other existing industry adopted accreditation or quality assurance standards and relevant Codes of Practice, if not in actual wording then at least in intent. The primary areas of difference between the PROOF CTM standards and other standards adopted by industry lie in the following areas:

- **Stocking densities** - are generally lower in the PROOF CTM standards. However, density per se is not the most important factor affecting bird welfare; the way that the birds are managed and how their environment is managed are key to good welfare. Lower stocking rates on ranges and sheds do not automatically mean improved animal welfare. Nor do lower densities ensure pasture availability on ranges. Pasture availability on the range is more likely to be impacted by a number of range management and flock management strategies, including turnaround times between flocks.
- **Management.** The PROOF CTM standards are **deficient** in terms of management of the internal environment of the housing provided to chickens, in particular the ventilation / temperature control and management of the litter (bedding) in the poultry house, which are key determinants of poultry welfare.
- **Pasture and soil health.** There is more in the PROOF CTM standards about management of the pasture and range soil than in the standards applying to most other accreditation systems for meat chickens. However, industry best practice requires a more complete approach to environmental management, as documented in its Environmental Management System for the meat chicken industry: <https://rirdc.infoservices.com.au/items/14-100>.

The following PROOF CTM standards relating to density are confusing:

“4.8. When birds are contained in housing overnight for protection from predators, maximum stocking densities in the house will apply. Stocking density indoors for layer hens and meat chickens shall not exceed;

4.8.1. 16kg of birds per square metre; and

4.8.2. 25kg per square metre for all other birds”

While we understand the intention, this needs to be expressed in a different way to make the intent clear.

There is at least one contradictory set of standards viz *“11.4. Meat chicks must have unrestricted access to the range”* and *“2.2 Animals will have access to paddocks and pasture for a minimum of 8 hours each day”* (the proviso regarding the fact that the birds are only required to have such access after they are sufficiently feathered is clearly applied to both these standards and is not at issue). These two standards are incompatible in that one suggests unrestricted access, the other that they must have access for at least 8 hours a day. This inconsistency would be rectified by the removal of the word “unrestricted” from 11.4, noting, however, our previously expressed concerns regarding the lack of exemption from this provision in the event of adverse or unsafe conditions for the birds.

3. Impact of PROOF CTM on industry

We would see that this is a certification system that would only be applicable to small scale chicken meat production.

We would expect that there would be limited participation in this program, noting that approximately 60% of chicken meat production in Australia is currently accredited under existing certification programs which are also independently audited, including the well-recognised FREPA system, which is very broadly embraced and supported by the industry, as well as the RSPCA Approved Farming program.

The ACMF is concerned that adoption of the PROOF CTM standards would expose the broader industry (and the community) to an increased risk of disease, in particular avian influenza, due to the inadequate biosecurity measures proposed in the standards.

Please do not hesitate to contact me for clarification of any points raised in the above comments.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'V Kite', written in a cursive style.

Dr Vivien Kite
Executive Director