

16 July 2020

David Hatfield  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

By email: CTMs@acc.gov.au

Dear Mr Hatfield

**CTM 1914662 - Certified Humane - Submission on Version 2 of the CTM Rules**

Thank you for the opportunity to provide further comment on the above application for a Certification Trade Mark (CTM).

We note in the response to the ACCC's Initial Assessment that Humane Farm Animal Care (HFAC) believes the concern regarding neck cutting of unstunned chickens for a Muslim religious exception is inappropriate. The HFAC standard allows meat chickens to be stunned up to 5 seconds following a neck cut, which effectively means cutting the throat of a fully conscious bird. It should be noted that halal (Muslim) slaughter is practiced in the majority of meat chicken abattoirs in Australia and that this slaughter is conducted with prior stunning (either electrical or gas) of the bird. Unlike in many other countries, prior stunning of the bird has long been accepted by halal certifiers in Australia and it would be detrimental to bird welfare to allow this to change or be questioned. Unstunned slaughter is widely acknowledged and scientifically determined to be inhumane. In relation to slaughter, the RSPCA definition of humane killing is: *'when an animal is either killed instantly or rendered insensible until death ensues, without pain, suffering or distress'*. When killing animals for food (termed slaughter), this means they must be stunned prior to bleeding out so they immediately become unconscious. Any product label implying humane farm animal care and slaughter must ensure that production and slaughter methods are indeed humane.

Reference to RSPCA guidelines in the introduction to HFAC standards should clearly identify which RSPCA this is referring to, e.g. RSPCA UK or otherwise.

RSPCA Australia does not wish to make any further comment at this time but would like to be informed of the outcome of the ACCC's assessment.

Yours sincerely



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