

25/8/2019

To whom it may concern,

Thank you for the opportunity to provide feedback on the certification trade mark application from Humane Farm Animal Care. Sentient is an independent, veterinary-driven association dedicated to animal welfare advocacy. Our members have expertise in a range of areas, including animal behaviour and welfare for farmed animals.

Sentient does not support the use of the certification trade mark "Certified Humane" because it misleads consumers into believing that the animals raised for the production of their food were treated "humanely." Unfortunately, many of the Certified Humane standards permit procedures and practices that could not reasonably be interpreted as "humane."

For example, Certified Humane Standards permit:

- Castration to be performed on male animals without the use of analgesia or anaesthesia. Castration is a highly painful surgical procedure, for which both aesthetic and analgesic agents are applied for companion animal species owing to the pain involved. Farmed animals feel the same level of pain as companion animal species, and therefore this omission cannot reasonably be construed as "humane."
- Broiler (meat) chickens and laying hens (aviary systems) to be kept indoors for their entire lives, without access to sunshine or environments that allow them to carry out the full spectrum of "normal" behaviours, including perching, roosting, and escape from bullying by conspecifics.
- Broiler chickens to be exposed to 72 hours of continuous light prior to slaughter, significantly interfering with their ability to sleep a form of torture.
- Beak trimming (removal of highly sensitive tips of the beaks) to be performed without any pain relief for laying hens.
- Premature separation of calves from their mothers in the dairy industry. Calves naturally wean between 7-8 months of age, before which time they live with their mothers. Maternal separation prior to this normal period is highly traumatic for both mother and calf, especially when it occurs within the first couple of days of life, as is permitted in these Standards.
- Teeth clipping and tail docking to be performed without the use of analgesia or anaesthesia in the pig industry.

We trust that these examples demonstrate that the use of "humane" is a highly misleading adjective to apply to Certified Humane's Standards and therefore this certification trade mark should be rejected.

Regards,

Dr Rosemary Elliott, President (Rosemary.Elliott@sentient.org.au)