



TASMANIAN FARMERS & GRAZIERS ASSOCIATION

Ms Jaime Martin
Assistant Director | Adjudication
Australian Competition and Consumer Commission
Level 17 | 2 Lonsdale Street
Melbourne VIC 3000

Email: CTMs@acc.gov.au

Dear Jaime,

TFGA Submission – CTM 1914662 – Humane Farm Animal Care

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

Agriculture is one of the key pillars of the economy and, with the current level of support from government, are well positioned to further capitalise on the stature of Tasmanian agriculture.

The TFGA appreciates the opportunity to submit a submission regarding the CTM 1914662 – Humane Farm Animal Care (HFAC).

In direct consultation with our members, the TFGA are aware that HFAC have lodged an application with the Australian Competition and Consumer Commission (ACCC) to register Certification Trademark No. 1914662 (HFAC CTM).

The TFGA notes that HFAC notified ACCC of proposed amendments to the proposed CTM rules as detailed below:

1. HFAC proposes to include the following general statement to the CTM Rules: “The CTM rules which are available to Australian farmers and/or suppliers are compliant with the Australian Animal Welfare Standards and Guidelines and will be automatically modified in accordance with these standards”.
2. HFAC proposes to vary the Proposed CTM Rules, to include a statement to note the requirement for the ACCC’s approval of any proposed changes to the Proposed CTM Rules in the future.

The TFGA agree with both added inclusions and suggest the following additional points to be considered:

1. The Proposed CTM Rules and all other accompanying documentation be updated to either contain an "Interpretation Guide" to distinguish the meanings of some terminology as the US and Australia definitions can differ or change the differences in all terminology to suit Australian grammar to minimise misinterpretation. As an example "Broiler Chicken" is more commonly known in Australia as the more generic term, "Meat Chickens or Chicken Meat".
2. Remove "Bison" from the list of animal species annexes listed as Australia does not consume Bison.
3. In the Inspector Information Manual, it is recommended that identification of Inspectors should be defined. Inspectors should have to show appropriate identification that can't be easily forged, to ensure that the risk of unauthorised and fraudulent access to farming properties is minimised.

Thank you for the opportunity to submit a submission. We look forward to hearing the conclusions of this application process.

Please contact the TFGA if you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Skillern', with a large circular flourish above the name.

Peter Skillern
Chief Executive Officer
5 September 2019