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22nd July 2020

David Hatfield
Director - Adjudication
Australian Competition & Consumer Commission GPO Box 3131
CANBERRA ACT 2601
CTMs@acc.gov.au

Re: Revised Trade Mark Application by Humane Farm Animal Care

Dear Mr Hatfield,

Permission is given to provide this letter online.

Thank you for your letter in relation to the revised certification trademark for Humane Farm Animal Care.

The position of the Commercial Egg Producers Association (WA) has not changed, with the Association noting that the purpose/program of the non-for-profit organisation still does not encompass all West Australian egg producers.

Industry is still in the process of working through the *Australian Poultry Animal Welfare Standards and Guidelines* with outcomes from the consultation still to be finalised. CEPA believe it would be pre-emptive for Humane Farm Animal Care's trademark to meet current industry standards in their guidelines, as the guidelines themselves are still being drafted by Government and stakeholders.

Further, the Quality Assurance programs and welfare guidelines currently used by industry recognise caged, barn and Free-Range production systems.

Humane Farm Animal Care does not recognise the caged production system and does not reflect current Australian Consumer laws with regards to the definition of 'Free Range', therefore it is unable to model its programs/animal welfare policies to the same Australian Welfare Standards.

The revised drafted program is still unsuitable as a trademark in Australia and CEPA request that the egg laying standard be removed from the trademark.

Kind Regards,
Ian Wilson



President
The Commercial Egg Producers Association (WA)