
Subject:

FW: PETA's submission to ACCC – Humane Farm Animal Care certification trade mark (CTM1914662)

To Whom It May Concern,

I hope this message finds you well. Please find herein People for the Ethical Treatment of Animals (PETA) Australia's comments regarding the ACCC's consideration of an application from Humane Farm Animal Care (HFAC) to register Certification Trade Mark No 1914662. As per your call for submissions, our comment focuses on "whether the various farm animal welfare standards contained in the Proposed CTM Rules would ensure that animals are treated in a way that is consistent with Australian consumers' reasonable expectations of 'humane' food production".

In short, no process that turns a living, feeling being into a dismembered, bloodied cut of flesh can ever be described as "humane", which the *Collins English Dictionary* defines as "act[ing] in a kind, sympathetic way towards other people and animals, and try[ing] to do them as little harm as possible". 1 in 10 Australian do not consume the "food products" to which the proposed certification guidelines refer, and in doing so they demonstrate daily that it is entirely possible to do as little harm to animals as possible and still maintain an accessible and nutritionally appropriate diet. Consumers who rely on 'humane' food labels in making purchasing choices expect that animals raised and killed to be turned into consumables experience "happy lives" and minimal suffering during the slaughter process. Even if welfare guidelines are strictly adhered to, these assumptions and expectations rarely align with the realities.

For example, the standards for cattle raised for beef acknowledge, "Research has shown that ... both hot branding and freeze branding are painful procedures", yet they allow for either under the "humane" certification. Other allowances for suffering within HFAC guidelines include the provisions for up to 10 hours to elapse between the loading and unloading of live chickens who are being transported and for the beaks of hens used for their eggs to be trimmed when they are 10 weeks of age or younger, even though trimming can result in reduced sensitivity and impaired function of a bird's beak.

The guidelines also allow for pregnant and newly-nursing sows to be housed in farrowing crates a mere 1.8 by 2.4 metres in size; supporter feedback consistently demonstrates to us that the average Australian would consider confining a new mother to a space roughly equal to a dozen doormats to be nothing short of barbaric - and a far cry from humane.

Of course, this all assumes observance of "best practices", which exposé after exposé has confirmed is not occurring in any animal-exploiting industry whether its products are marketed as humanely produced or not. The constant stream of industry-backed proposals by both national and state governments to create new offences and increase penalties for those who attempt to improve transparency in animal agriculture simply confirms these industries have no good faith intention to remedy that.

The guide also largely fails to address the actual slaughter of animals. In the standards for pigs, Section S.3 of Part 7(A) doesn't refer to *any* Australian standards, yet we know that group-gassing is touted as "humane" here – despite 2014 footage from inside the nation's largest pig abattoir which shows pigs thrashing and screaming as they gasp for breath inside the gas chambers.

Given that it's unlikely the average Australian would consider *any* of the above examples humane – nor countless others, like the castration of week-old piglets without pain relief – we strongly believe that allowing products to be promoted as such would mislead consumers. The term "humane meat" is an oxymoron and PETA's view is that certification of a mark for use in marketing such products can never align with consumers' reasonable expectations of how farmed animals should and will be treated.

As Australian consumers become increasingly uncertain whether "humane meat" can exist, we urge you to deny approval of Certification Trade Mark No 1914662, which would allow businesses to claim they sell it.

Sincerely,



Emily Rice
Outreach and Partnerships Manager, PETA Australia

Paula Hough
Vice President &
Deputy General Counsel, Asia-Pacific
PETA Australia

PO Box 20308 | World Square | Sydney NSW 2002