

27 January 2022

Mr Jeremy Thorpe
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By email: Jeremy.thorpe@pwc.com
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Dear Mr Thorpe

Thank you for the invitation to participate in the Department of Agriculture, Water and Environment's consultation process regarding Australia's domestic organics market.

As Australia's largest and most trusted animal welfare organisation, the RSPCA is dedicated to improving and promoting the welfare of animals. This includes those animals who are produced for food. The RSPCA Approved Farming Scheme is the nation's leading independent certification scheme focused on farm animal welfare. The Scheme works closely with Australian farmers, the farm animal sector and the retail sector to improve the welfare of animals on farm, during transport and at slaughter. The species-specific Standards that underpin the RSPCA Approved Farming Scheme focus on providing animals with an environment that meets their behavioural needs.

In our experience, farms with or aiming to secure organic certification generally fail the RSPCA Approved Farming Scheme's certification process because our Standards require higher animal welfare than the current organic certification requirements. In other words, contrary to consumer expectations, an 'organic' label on an animal product currently does not necessarily provide assurance of higher welfare, be it on farm, during transport or at slaughter.

Therefore, the RSPCA recommends that the following requirements would provide greater consistency, transparency and higher animal welfare outcomes within the organic sector:

1. One single and agreed definition of the term 'organic'.
2. The development of a mandatory standard through the Australian Standards processes which should articulate high animal welfare standards for animal products.
3. Clear, accurate and truthful food labelling.
4. A single certification body to better streamline the organic certification process.

These factors would simplify regulation and provide confidence to Australian consumers and international customers in selecting organic products that have been produced to higher welfare standards and to avoid those produced to poor animal welfare standards.

Yours sincerely



Richard Mussell
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