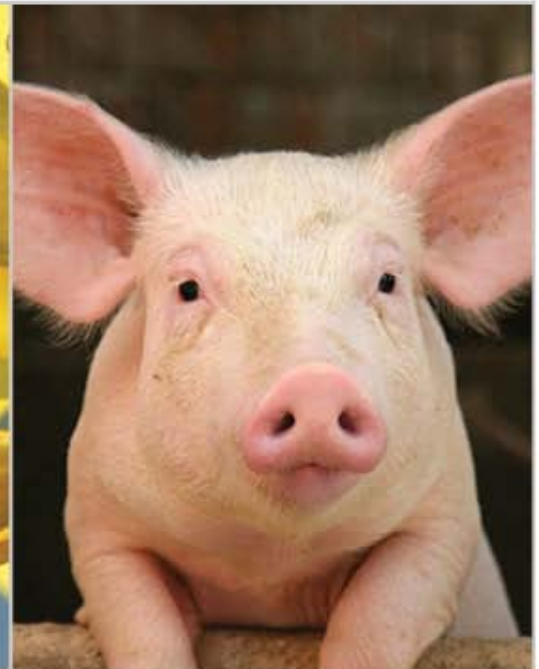


AUSTRALIAN
PorkTM

AUSTRALIAN PORK LIMITED

Australian Made, Australian Grown trade mark – proposed changes

13th December 2013



Australian Pork Limited (APL) welcomes the opportunity to provide a submission to the Australian Competition and Consumer Commission (ACCC) regarding proposed changes to the Australian Made, Australian Grown trade mark rules.

2 APL is the national representative body for Australian pig producers. It is a producer-owned, not-for-profit company combining marketing, export development, research & innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry. APL works in close association with key industry and government stakeholders.

Proposed rule changes

3 Australian Pork Limited (APL) is supportive of the Australian Made, Australian Grown Campaign (AMCL) and the work they do to promote Australian grown / made / produced products. We are also supportive of their efforts to help make country of origin labelling clearer for consumers.

4 APL supports the change from budgeted sales for the licence period to actual sales for the previous 12 months as the basis for calculation of the licence fee. We agree this change will improve the fairness of the system for calculation of fees.

5 APL supports replacement of the statutory declaration required for applications with a *Warranty and Indemnity*. This will increase the integrity of the campaign, by ensuring licensed companies are bound to the obligations of the Australian Made, Australian Grown Campaign Code of Practice. Considering the Australian Made Australian Grown logos are so trusted by consumers, it is important the licensing process is able to ensure the logos are used with utmost integrity.

6 APL supports the “list of processes that are not considered substantial transformation” in the Australian Made, Australian Grown Campaign Code of Practice. We support the additions to the list proposed by the AMCL. APL would also support inclusion of such a list in ACCC guidance material and in food labelling regulations.

7 In relation to the addition of Rule 23 (c), regarding the obligation of licensees to start using the new logo as soon as directed if AMCL chooses to alter the logos’ design – APL believes the rules should include an appropriate phase-in period to allow for reprinting, repackaging etc., to minimise the cost born by licensees due to AMCL’s decision to change the logo.

Conclusion

8 Noting the above commentary, APL supports the proposed changes to the Australian Made, Australian Grown Campaign Code of Practice.