

Mr Eliot Forbes  
CEO  
AniMark  
PO Box 1359  
Milton QLD 4064

By email: [standards@animark.com.au](mailto:standards@animark.com.au)

Dear Mr Forbes

The Australian Livestock Exporters' Council (ALEC) appreciates the opportunity to provide comments on the Livestock Global Assurance Program (LGAP) Standards on behalf of our members. ALEC notes that LGAP was developed in 2016 to compliment the Exporter Supply Chain Assurance System (ESCAS) and recognises that updates to ESCAS since this time necessitate the need to update the 2016 LGAP Standards to ensure alignment with contemporary ESCAS requirements.

ALEC has sought comments from our members on the LGAP Standards which are collated and provided below. It has become clear from this feedback that the LGAP standards are very difficult to interpret without a guidance document providing examples of evidence necessary to demonstrate adherence to each standard. A guidance document, similar to the one for [ESCAS](#), is a necessary resource for gaining the requisite understanding of the standards and to therefore provide comprehensive feedback. ALEC understands that such a document was developed in 2015/16 and therefore needs refinement as has been the case with the LGAP Standards. As such, ALEC strongly recommends that once refined, the LGAP Standards guidance document is consulted on before implementation. Similarly, the LGAP Certification Rules also warrant a formal review.

It is also important to note that LGAP is not intended to nor will replace ESCAS. LGAP was designed to be a more efficient and effective vehicle for exporters, importers and facilities will show compliance with ESCAS requirements. This point would be worthwhile emphasising within the LGAP Standards to ensure a thorough understanding by each component of the livestock export supply chain, particularly considering our trading partner importers have dealt exclusively with ESCAS since 2012. A greater understanding by Australia's importer customers of where and why LGAP is being implemented, will better incentivise and encourage adoption.

#### LGAP Standards – General comments

- There appears to be an inherent assumption that the Department of Agriculture, Water and the Environment (DAWE) will take a pragmatic, common sense approach to interpreting the LGAP Standards. Unfortunately, this could not be further from the truth. While the level of documented evidence required to demonstrate compliance to each standard may vary, dependant on the complexity of the facility being

assessed, where possible this needs to be specified within the LGAP Standards, or guidance document, to ensure the intended interpretation is the only interpretation.

- LGAP has been referred to as an enabler of ESCAS, yet the LGAP Standards indicate that several practices may need to be adopted by operators and facilities to demonstrate compliance that are above and beyond what is required under ESCAS. In the unfortunate event that LGAP is made a voluntary program, this could result in a two-tiered system where LGAP is both more cumbersome and expensive to implement than existing ESCAS compliance systems. This would most likely negatively impact the adoption of LGAP. ALEC therefore recommends that the revised LGAP standards require practices and procedures equivalent to, and consistent with, existing ESCAS standards.
- The scope of each Standard states that 'Slaughter maybe for food supply, or for cultural or religious *observances*'. ALEC recommends that this statement is removed as it is unnecessary and there is little to be gained by inclusion.
- The term 'competent', used throughout the LGAP Standards, is open to interpretation and therefore warrants a definition. Clear definitions and the absence of subjective interpretation is necessary for standards.

#### LGAP Standard 1000

- **Introduction (page 7)** – Levels for operators (exporters/importers) are unnecessary and should be removed. Such levels are not indicative of the operator's performance, they are more the level of the abattoirs they supply, of which operators have little means to influence. Operators risk ratings are based on performance which is appropriate and sufficient.

#### LGAP Standard 1001

- **5. (page 12)** – The 'Principle' is vague and open to interpretation. Parameters as to what constitutes appropriate is required.
- **5.3 (page 12)** – Clarification is required to ensure this standard does not impose unachievable traceability requirements on species without individual electronic identification i.e. sheep.
- **5.4 (page 12)** – This is a statement without substance. Detail on back up equipment requirements is necessary.
- **5.11 (page 13)** – Needs to include unauthorised removal / theft.
- **6.3 (page 14)** – Clarification on how animals are expected to be checked for identification when moved into or out of a site and during their time within a site i.e. visual?
- **6.5 (page 14)** – Checking all identification documentation accompanying livestock for accuracy and recording any discrepancies could prove hugely onerous for mob based and electronically tagged consignments if not applied logically. Further clarification is necessary.

- **6.10 (page 15)** – Individual unique identifiers should only be removed from dead animals.
- **6.12 (page 15)** – For what purpose and on what basis? Further clarification is necessary.
- **7.1 (page 16)** – In combination with the sample size requirements in Annex I (page 48), this standard significantly increases the monitoring and reporting requirements of facilities when compared with ESCAS requirements. Under ESCAS, this form of monitoring (based on sample sizes) and reporting is only required for initial or performance audit purposes which may occur once, twice, or in rare cases four times a year, dependent on the risk rating of the facility. Whereas this standard is requiring the facility to undertake daily reporting, adding a new and significantly onerous requirement.

A majority of facilities will most likely need to employ a new staff member purely to fulfill these monitoring requirements. The cost implications of this are obvious. ALEC recommends that the frequency and sample size of monitoring activities be at the discretion of operators and facilities i.e. on a regular basis or similar. This would take into consideration the additional layer of surveillance in the form of internal audits under LGAP that is above and beyond ESCAS requirements.

- **7.2 (page 16)** – Checking all animals individually is impractical. Recommend replacing systematically with routinely.
- **7.20 (page 20)** – If the reference to the presence of broken needles is referring to broken needle stems left in animal flesh after vaccinations, the standard should specify accordingly.
- **7.22 (page 20)** – The intended animal welfare outcome i.e. reduced vocalisation, is achieved through appropriate animal handling. Therefore, focusing the standard to ensure appropriate handling will achieve better welfare outcomes than additional documentation requirements to record the percentage of animals that vocalise.
- **8.1 c) and 8.2 d) (page 21)** – Clarification is required to ensure this standard does not impose unachievable traceability requirements on species without individual electronic identification i.e. sheep.
- **8.5 (page 22)** – Unaccountable losses should warrant a stronger response.
- **8.9 (page 23)** – Clarification is required to ensure this standard does not impose unachievable traceability requirements on species without individual electronic identification i.e. sheep.
- **9. (page 24)** – The word considerate is used several times in the document and should be replaced with humane.
- **9.1 (page 24)** – Refer to comments on Annex E.

- **9.4 (page 24)** – The intended animal welfare outcome i.e. reduced vocalisation, is achieved through appropriate animal handling. Therefore, focusing the standard to ensure appropriate handling will achieve better welfare outcomes than additional documentation requirements to record the percentage of animals that vocalise.
- **9.16 (page 26)** – This standard should be outcomes based i.e. death as prescribed in Annex L, making the addition of an alternative unnecessary and unwarranted.
- **9.18 (page 26)** – Too general in nature, more immediate and decisive action is required. Suggest revising to ‘the foetus should be humanely destroyed immediately’.
- **B.5.3 (page 32)** – LGAP 1001 is an animal welfare standard, not food safety. Suggest removing reference to food safety risk.
- **B.5.10 (f) (page 32)** – Suggest considering whether to include the need for animal transport crates to have sufficient partitions and gates to adequately confine animals in groups for safety and where transport vehicles have an upper deck internal ramps between decks as standard equipment.
- **B.6.1 (page 32)** – The responsibilities described in a) and b) are the responsibility of the facility operator, not the transport operator. Transport operators only assume responsibility for livestock once they are loaded on the transport vehicle and it is not practical to identify animals while on a transport vehicle. Deletion of the standard is recommended.
- **B.8.2 (b) (page 34)** – Clarification is required to ensure this standard does not impose unachievable traceability requirements on species without individual electronic identification i.e. sheep.
- **Annex C: Methods of Identification (page 36)** – Clarification is required to ensure this standard does not impose unachievable traceability requirements on species without individual electronic identification i.e. sheep.
- **Annex E: Methods of restraint (page 40)** – The LGAP Standards specify requirements associated with three levels of certification with the original intention being to provide an incentive for exporters, operators and facilities to strive towards a higher level and therefore higher animal welfare standards. Unfortunately, the current structure of the program does not provide this incentive. The highest level, level 3, recognises good animal welfare practices but it cannot be considered aspirational. While it is important that acceptable lower LGAP levels are not diminished in any way, further consideration is needed to improve the aspirational objectives of LGAP levels.

On the flip side of this, the practices in level 1 LGAP standards should not be endorsed by the Australian livestock export industry, nor is it likely that any facility would pay to become level 1 accredited as it is expensive and does not provide access to Australian cattle. It represents a large community perception risk, with little benefit. ALEC recommends LGAP level 1 accreditation to be either removed or postponed for roll-out after the establishment of the program.

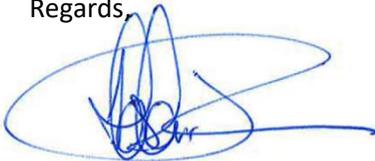
- **Annex I: Sampling procedures and frequencies (page 48)** - refer to comments made for 7.2. Sample sizes of animals for monitoring activities are different to, and are substantially increased under LGAP 1001, as compared to ESCAS. ALEC recommends reducing the sample sizes to reflect those outlined in EAN 2018-01.

LGAP Standard 1002

- **6.1-6.3 (page 12)** – LGAP is an assurance framework to meet the compliance requirements of ESCAS. ALEC questions where in ESCAS are exporters compelled to have systems and processes in place that require a risk-based approach to meet the regulation or manage animal welfare issues when they arise, and by extension, why such an approach is included in the LGAP Standards.
- **7.9 (page 16)** – Includes several possible scenarios for which it is unrealistic to have effective contingency plans (theft, civil unrest and hostilities etc). Again, far more prescriptive, and lacks equivalency with ESCAS. ALEC recommends removing all scenarios referenced in 'NOTE' section.
- **11.4 (Page 23)** – The phrase 'continually improve' is animal welfare jargon. At some point a system should be deemed adequate. ALEC recommends removing the phrase or revising the wording to 'striving to continually improve'.

On behalf of our members, thank you again for the opportunity to comment on the LGAP Standards. As raised earlier, a contemporary guidance document, similar to the one for [ESCAS](#), is required to accurately and consistently interpret the LGAP Standards. As such, we eagerly anticipate consultation on the guidance document in the near future. Please do not hesitate to contact me if you have any questions.

Regards,



Alastair James  
Deputy Chief Executive Officer  
Australian Livestock Exporters' Council