

Livestock Global Assurance Program (LGAP) Standards – Public Comment Determinations (Redacted)
LGAP 1001, *Livestock assurance – Requirements for animal welfare and management*

Standard Number:	LGAP 1001	Standard Version Number:	Public Comment Draft 0.7
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General Comment		Assigning as compliance inspector a party who is also selling compliance certification services can result in conflicts of interest and all associated undesirable outcomes. I propose to include a clause similar to the one on the right.	To prevent Conflict of Interest being designed in to the model, auditing and monitoring by third parties shall only be granted to be carried out by such third parties who are not engaged directly or indirectly in assessing for Certification.	1. Noted. This is covered by the LGAP Certification Rules which include provisions for managing conflict of interest and reference to ISO/IEC 17065, which includes requirements for impartiality.
All		The standards tend to emphasise unacceptable actions and/or procedures rather than the actions required. It may be useful to readers and users of the standards to know what actions should be implemented and adopted as well as actions to be avoided.		2. Noted. The LGAP Standards are performance based Standards. The requirements prescribe the outcome expected, and are not intended to provide specific implementation actions. This is contemporary Standards practice as followed by ISO. As guidance to Operators, Facilities and Auditors, the <i>Example of evidence</i> section provides examples of implementation actions.
All	<u>All</u>	"In general the standards are within the guidelines established by other organisations for the acceptable		3. Noted.

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		husbandry and welfare of livestock and should serve as guides for the export industry as well as segments involved in the transport and assembly of cattle within Australia."		
All	All	Reconsider the application of the animal welfare requirements on Importers. It is not clear as to what extent Importers are only systems and paper based, or are they 'do'ers' with real livestock in which case the animal welfare requirements should apply.	Determine whether or not the requirements in LGAP 1001 are applicable to Importers, and if so which ones. Note that the future audit questions will include an option for a 'Not applicable' answer to take into account individual circumstances.	4. Accepted.
Introduction		Each of the four standards has the same introduction. Additional explanatory material that is specific for each standard would help explain to the readers what each standard is about. There is an implied assumption that the reader will know the content of each standard.		5. Accepted. Paragraphs added to each introduction.
Introduction		Reference to Annex B and D could be highlighted on page 6 where transport requirements are first mentioned.		6. Partially accepted. The introduction amended to explain the structure of the requirements.
Introduction		Reference to the three levels of LGAP (i.e. LGAP Level 1, Level 2 and Level 3) – difficult to understand what this means on first read. Would be helpful to reference Annex C and E on page 6, and refer the reader to where more information on the certification level for LGAP can be found.		7. Partially accepted. Explanation of levels currently in documents has been expanded.
Introduction	<u>3rd bullet list item</u>	Enable the traceability of animals within and between operators and facilities – should be identification		8. Not accepted. Definition of traceability includes identification and

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				movement recording as per the definitions in LGAP 1000. Identification is only one component of traceability.
4.1		The Standards recognise that good animal welfare is dependent on Operators/ facilities having the correct personnel. The requirement within the Standards identifies the importance of personnel and ensures that skills acquired through differ methods, formal training and experience, are given due weight in the assessment.	-	9. Noted.
4.1	note	To be able to fulfill the requirements, it is necessary that the number of persons is calculated on the base of the number of animals to deal with	NOTE Determination of the number of personnel is affected by: <input type="checkbox"/> the size, type and frequency of the operation; <input type="checkbox"/> the timing of festivals or cultural events; <input type="checkbox"/> environmental conditions; and <input type="checkbox"/> the type of livestock involved - the number of animals	10. Accepted.
4.2		In some cases, pilot Operators and Facilities noted 'training had been undertaken' as demonstration of the fulfilment of this requirement. The requirement is intended to be more comprehensive than simply provision of training. Operators and Facilities are meant to identify the competencies from Annex A and then demonstrate through observation and records that its personnel	Change the requirement to state: The Operator or Facility shall: a) identify and demonstrate that its personnel have at least the competencies contained in LGAP 1001 Annex A:.....; and b) maintain documented	11. Accepted.

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		have these competencies.	information to support fulfilment of a). Change the evidence text to reflect order of importance - observation of practices first, records next.	
4.2		During the pilot some evidence was submitted of competency recognition given by regulatory authorities e.g. licences. In some instances these appeared to be for halal slaughter. To have relevance such licences must relate directly to the competency criteria, and being a licenced halal slaughter person is not necessarily related to demonstrating competence for animal welfare. Add a note to the evidence section to ensure users of the Standards are aware of this.	Add to the evidence section the following: "Copies or photographs of licences should clearly state the nature of the approval and competence and should be able to be linked to the competency criteria identified in Annex A."	12. Partially accepted. Minor amendments to wording.
4.3		It would be useful for additional examples of evidence to be included.	Addition of more examples of evidence to be provided to assist in Operators/ Facilities gaining an understanding of the requirements of LGAP.	13. Noted. This is dealt with in the Management System Template provided under LGAP.
4.3 b)		Example of evidence that the day to day application of the LGAP standard is being complied with cannot be tested by a single data point like an audit. Therefore I propose to have the Example listed changed as per the proposed text to the right.	A responsible person is present at the site during an audit. A person sufficiently qualified to ensure compliance is present at the site at all times of animal handling or processing and is available for assessment during an audit.	14. Partially accepted. This is an example of evidence, evidence needs to be specific to the day of the audit. The requirement maintains the person must be present at all times. Added to evidence.
4.3 c)			'officer' should be inserted after	15. Not accepted.

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			'animal welfare' under Point c)	The requirement specifies a person is responsible for animal welfare. What term is used to describe this person and position is immaterial and discretionary.
4.4	Paragraph 1), letter a)	These are important emergencies that need to be solved with a good contingency plan indicating the procedure for the resolution	a) viii) sick animal, eutanasia, emergency unloading, place for emergency unloading	16. Accepted.
5.1		The requirements are well developed, as they will ensure that equipment and infrastructure are kept in a condition that will enable good animal health and welfare outcomes. It is excellent that in relation to infrastructure there is a focus on design, as this will ensure continual improvement as new research is undertaken.	-	17. Noted.
5.1		Evidence says: Where defects are noted, actions are taken immediately to remove the protrusion, fault or flaw or remove animals from the area (until defect has been rectified). BUT there is no requirement for action against this.	Either remove evidence for correction or add requirement to make correction (or reference this requirement if it is included elsewhere in the Standard).	18. Not accepted. This is adequately covered under the current wording of 5.2 a).
5.2 – 5.3		In some pilot responses it was considered these requirements should not be applicable to Importers as they are just corporate offices and do not have they own equipment or infrastructure.	Consider deleting the 'x'es in the Importer column.	19. Not accepted. In the absence of the feedlot or abattoir taking responsibility, somebody needs to be responsible for unloading and dispatch from port of arrival. Hence the Xs should remain for importers.

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5.2		The requirements recognise the need to ensure that equipment is correctly maintain and the evidence requirements will ensure ongoing compliance. The requirements and the need for certain evidence, such as the maintenance record, will ensure that Facilities/ Operators are continually examining their performance and that the certification program will maintain a high level of integrity.	-	20. Noted.
5.3	Paragraph 1	A log where the person responsible signs a declaration of emergencies occurred should be included to have trace	Record of emergencies should be kept	21. Not accepted. The requirement is about the outcome of relevant personnel being competent in the case of emergencies, and not the occurrence of emergencies per se. The need to keep records of emergency destruction (which contributes to traceability data) is included in other requirements (section 7).
5.3		Suggested addition to evidence.	Add to the evidence section the following: the organisation may maintain a plan with different types of emergencies and conduct mock drills at frequent intervals.	22. Not accepted. This example of evidence is too prescriptive and may inadvertently start to be applied as a requirement.
5.4 b)		"protected from livestock" what about electric fence which on many occasions are already installed <u>and needed</u> .		23. Accepted. Reworded: All points of access to mains electricity shall be: and NOTE added to mention this does not include electric

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				fences.
5.5	headline	Proposing for definition to include pest control as it may be a common risk.	(e.g. chemicals, cleaners etc.) shall: (e.g. chemicals, such as cleaning and pest management compounds) shall:	24. Not accepted. Suggested changes too specific. Chemicals include compounds of any kind.
5.6		Suggest to be more specific and to demand for standard to be upheld at all times.	The flooring of infrastructure and equipment shall be drained, provide a non-slip surface and be hygienically managed. All surfaces for humans or life stock to stand on or walk on, such as the flooring of infrastructure and equipment shall be drained, provide a non-slip surface and be hygienically managed at all times.	25. Not accepted. The inclusion of humans is outside the scope of this Standard. The rest of the suggested change is already adequately covered with the current wording. It is inherent that the Standard must be upheld at all times.
5.6		An auditor in the pilot observed maintenance records but it was not clear whether these included records associated with hygiene (e.g. cleaning).	Include a reference to cleaning procedures and records in the evidence section.	26. Not accepted. Adequately covered in the evidence, auditor interpretation is the issue.
5.8		Very vague – all Australian farm animals are exposed to heat and cold – needs to be clear i.e. extreme heat or cold, absolute clarity needed.		27. Accepted. New definition for ‘adverse environmental conditions’ added to LGAP 1000, and requirement reworded accordingly.
5.8		The requirement relates to whether animals are protected from exposure to adverse weather conditions or are alternative arrangements made to alleviate heat or cold stress? During the pilot it was noted that specific plans might need to be formulated and in place to deal with extreme in environmental	The Committee should decide whether the current wording is adequate or should be revised to include explicit mentions of plans to deal with exposure to adverse weather conditions.	28. Noted. This was incorporated in last Standards Committee version which occurred after pilot Standard was in use.

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		conditions. Inclusion of reference to plans in the requirement would provide more prescription.		
5.8			<p>A standardised term for adverse weather conditions should be used across the standards. It is proposed such a term could be: 'adverse environmental conditions' which could be defined as 'situations that result, or could result, in poor animal welfare outcomes due to climatic, physical or physiological causes'</p> <p>EXAMPLES</p> <ul style="list-style-type: none"> - extremes in temperature; - exposure to lightning, rain, snow, wind, sand or dust storms; - flooding; - drought; - volcanic activity; - epizootic or pests; or - fire. <p>This could be included in LGAP 1000.</p>	29. Accepted.
5.8	Additional requirements for feedlots and facilities	Add control ammonia levels with 25 ppm maximum under 10 ppm recommended.		30. Not accepted. This is now addressed by inclusion of air quality as one of the examples of 'adverse environmental conditions'. Adverse environmental conditions are addressed by reworded account 5.1. To include measurements such as those suggested is moving into

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				testing which is outside the scope of the Program.
5.10	Paragraph 1	Turn around is not sufficient, space between animals is needed to allow a real inspection	Holding pens shall allow for animals to stand up, lie down, turn around and access water without being in body contact with companions and allowing to be inspected.	31. Not accepted. Not included in other animal welfare programs and livestock can naturally huddle together for no adverse reason. Other factors take into consideration the ability for animals to be inspected such as infrastructure design, lighting etc.
5.10	headline	Suggest to be more specific.	Holding pens shall allow for animals to stand up, lie down, turn around and access water at all times when stocked with maximum allowable density.	32. Accepted. Requirement now includes the provision 'at all times'. Access to water has been moved and covered under requirement 7.12.
5.11	Headline	I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can be performed without undermining religious requirements.	Where stunning is used, stunning equipment shall be cleaned and maintained; Stunning shall be mandatory and stunning equipment shall be cleaned and maintained: a) at minimum daily when in use; and b) in accordance with manufacturer's instructions.	33. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
6		The focus of animal identification within	-	34. Noted.

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		<p>the Standards correctly illustrates its importance to ensuring a high level of animal welfare and health. The requirements of animal identification are well set out, with the requirements needed to guarantee compliance clearly articulated and the example of evidence illustrating this in further detail. The requirement clearly provides for individual identification to enable animal health and welfare to be tracked and monitored.</p>		
6.1		<p>Methods of Identification in Annex C include group identification with and without individual marking. This does not allow for effective traceability. This undermines the capacity of the standards to provide supply chain level assurance.</p>	<p>All animals shall be individually identified.</p>	<p>35. Not accepted. The scope of the Standard must reflect at least the OIE Code which includes guidance on identification individually, with a unique identifier, or collectively, with a unique group identifier and this is reflected in the LGAP Standard.</p>
6.2		<p>Rather than using 'toxic'. Would a more positive description of what is required be better, such as:</p>	<p>animals are identified using non-toxic substances, such as edible paint or human grade ink</p>	<p>36. Partially accepted. Reworded and examples of evidence expanded: ... shall not: a) be toxic to the animal; or b) present a food safety risk.</p>
6.2		<p>Knowledge about what may be toxic to animals in terms of methods of identification may not be widely</p>	<p>Consider whether to expand the evidence section to include a list of commonly used methods of</p>	<p>37. Accepted. Add to examples of evidence: Food grade ink or paint, edible</p>

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		understood.	identification that should be considered toxic and not permitted under this requirement.	paint or other non toxic substances.
6.3		In the pilot responses comments from the Auditors identified a focus on ensure there where records of movements in relation to this requirement. However this requirement is more about physically checking for ID.	Consider whether to expand the evidence section to make it more explicit that physical checking for animal IDs is what is required.	38. Accepted. Additional evidence added: Physical checking and observation of animal identification.
6.4		During the pilot application of this requirement in the context of Importers was difficult, especially in situations where the Importer did not have any physical location per se.	The standard should review the applicability of this subclause to Importers and perhaps modify the descriptions of animal identification in Annex C to bring greater clarity. The LGAP CC has also been asked to consider this and their advice will be provided to the Standards Committee for consideration.	39. Not accepted. See comment 19.
6.4 a)		"apply equivalent identification" – likely impossible with sheep.		40. Not accepted. It is possible.
6.5		More examples are requested of how this requirement by be verified by an Auditor.	Add further examples to the evidence section of this requirement.	41. Not accepted. Requirement and evidence is satisfactory.
6.6		Unnecessary work for the operator.		42. Not accepted. Necessary to maintaining traceability.
6.6		This standard does not require documentation to be kept of discrepancies.	The operator of the facility shall record all discrepancies in identification documentation and report these to the supplier of the livestock	43. Not accepted. This is already required under 6.5, this requirement relates to reporting.
6.7		Need to expand this requirement to cover situations where sheep may be recorded on a group basis but still have ear tags that	Modify to require replacement of IDs even when group based identification is being used.	44. Accepted.

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		are missing and should be replaced.		
6.8		Application of this requirement needs to be considered in relation to Importers.	Determine whether or not this requirement should be applicable to Importers.	45. Accepted. See comment 19.
6.8 – 6.10		These requirements are only applicable and as such should all be prefaced by “Where individual unique identifiers are used,…”	Add to the beginning of each requirements the words ““Where individual unique identifiers are used,…”	46. Partially accepted. "Where used..."
6.9		Based on pilot responses this requirement is causing confusion because it is not clear whether it is applicable in all cases, especially in relation to group identification of sheep etc.	Change this requirement to be explicit as to whether it is applicable to all livestock or only those that are identified through unique individual ID.	47. Accepted. Refer comment 46.
6.10		In some instances, e.g. for sheep individual devices are not used and thus the requirement needs to be changed to apply only in cases where devices are being used.	Replace the start of the requirement with: “When livestock have individual unique identifiers, any found or removed used individual unique identifiers shall be:…”	48. Accepted. Refer comment 46.
7.1		Application of this requirement needs to be considered in relation to Importers.	Determine whether or not this requirement should be applicable to Importers - Refer 6.4.	49. Accepted. See comment 19.
7.2 a)		All animals need to be individually examined in order to detect abnormalities	a) look at all animals individually and systematically...	50. Partially accepted. The use of the term individual may imply individual segregation which is not the intent. The intent is to inspect all animals in a group situation. Reworded: a) look at <u>each</u> animal...
7.2 a)		To ensure thorough inspection each animal shall be assessed.	look at each animal individually and systematically to detect levels of abnormalities, including leg health, body condition, respiration	51. Partially accepted. See comment 50.

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			and altered demeanour;	
7.2 a)		Add to examples of abnormalities - Swollen leg joints - After panting add (open mouth breathing) or labored breathing - Coughing animals		52. Accepted.
7.2 c)		Many stock on ad-lib feeding system so not always relevant to monitor unconsumed feed.		53. Noted. The qualifier to this is "and feeding behaviour".
7.2 e)		An animal is severely contaminated with manure if the sides, belly, and legs are soiled.		54. Accepted.
7.3		Several audit results indicated that this requirement should not be applicable in cases where the Operator or Facility was not responsible for arranging transport, and this is adequately covered by the requirement in B.7.1 a) which refers to Annex D Fitness for transport.	Consider deleting this requirement on Operators and Facilities as it is addressed under B.7.1 a).	55. Not accepted. It is expected that both Facility or Operator personnel and the transport operator ensure this occurs.
7.5 a)	iii)	There should always be a stunning device available	Cancel point a), iii)	56. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. This is particularly important in emergency situations where a truck driver may not have access to a stunning device and it would be cruel not to destroy the animal immediately.
7.5 b)		Should specify procedures for checking animals are unconscious/dead	Add checklists to Annex K and L	57. Accepted.
7.5 b)		Improve rigour re. application of "emergency cases"	the animal each animal individually shall be confirmed dead after the	58. Not accepted. Revised wording from

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			process.	comment 57 is mentioning Annexes K and L which now makes this requirement clearer.
7.5	headline	Improve rigour re. application of "emergency cases"	In emergency cases, reason of which must be documented, animals shall:	59. Partially accepted. Modification made to 8.2 that requires the nature of 'movements' of livestock. Such 'movements' include emergency slaughter. See addition of B.5.9 as well.
7.6 b)		Suggest to use example section to alert to non-slip requirements.	Unloading from the vessel is stopped, if the angle or non-slip properties or design of the ramp causes falls or slips in excess of the specified targets.	60. Partially accepted. Evidence, including suggested change, moved to 5.1 in relation to design, this requirement relates to handling so not applicable here.
7.6 b)		Several audit results indicated that this requirement should not be applicable in cases where the Operator or Facility was not responsible for arranging transport, and this is adequately covered by the requirement in B.7.1 a) which refers to Annex D Fitness for transport. As such the requirement could be modified to refer only to movement of animals in abattoirs from lairage to entry to restraint.	Consider modifying this requirement to make it only applicable to abattoirs during movement of animals from lairage to entry to restraint.	61. Not accepted. It is expected that both Facility or Operator personnel and the transport operator ensure this occurs.
7.6 c)		Physical pressure should never be applied as adequate aids should be used for handling	c) not have pressure applied when they have nowhere to go or are already moving in the correct direction;	62. Not accepted. Pressure can be that applied by aids not necessarily physical or adverse. Animal movement is created as a result of pressure on the flight zone, this is not adverse pressure. Pressure has now been defined - see 63.

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7.6 e)		Not clear what pressure is: after "pressure" add from driving aids or handled urging		63. Accepted. Pressure now a definition in LGAP 1000.
7.7		[] believes that the use of electric goads should not be allowed at any point in the supply chain		64. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows the use of electric goads in certain situations, which is mirrored in the LGAP Standard. This is common in many animal welfare programs and is seen in many countries, including Australia. There are valid reasons for their use, including worker safety, the importance is controlled use which the Standards require.
7.7		The requirement means electrical goads can be used on sheep and goats – is this the intent? And do electrical goads need to be locked away when not used etc.	Clarify this requirement in relation to sheep and goats and the storage of electrical goads to prevent their unauthorised access and use.	65. Accepted. Requirement reworded to be clearer.
7.7	<u>Electric goads</u> used for moving livestock	The use of electric prods cause stress to the animals involved and, as is indicated by the further requirements listed, pose a strong risk of misuse (as still occurs in Australia). Training in the use of other movement aids and infrastructure should be required.	Electric prods of all types must be listed as an 'unacceptable' practice.	66. Partially accepted. The scope of the Standard must reflect at least the OIE Code which allows the use of electric goads in certain situations, which is mirrored in the LGAP Standard. This is common in many animal welfare programs and is seen in many countries, including Australia. There are valid reasons for their use, including

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				worker safety, the importance is controlled use which the Standards require. Added i) to include requirement for instructions to be given on appropriate use.
7.8		The requirement calls for monitoring, but the evidence of fulfilment during the pilot related more to reviewing records. The audit evidence section should be amplified to confirm actual watching, counting and monitoring is required.	Add clarify to the evidence section to say active monitoring is required to be observed by the Auditor.	67. Accepted. New evidence added. Requirement revised.
7.9		Nothing listed in 'Examples of Evidence' column	Documents recording falls, slips and vocalization	68. Accepted. New evidence added. Requirement revised. See 67.
All, 7.9		Monitoring requirements and measurements. The standard needs to be clear when the use of monitoring is required and who is to undertake it, especially in relation to % thresholds for slips, falls, vocalisation, sensibility after stunning, loss of consciousness etc. Is it a continuous process for the Operator or Facility whenever they have livestock, or only undertaken in the context of an audit.		69. Accepted. Requirement revised.
7.10 d) and e)		There is potential conflict between this clause and the previous (d). No animal should be moved if movement will cause further pain or distress; thus if sheep or goats cannot walk unaided they should not be moved if this causes them pain or distress; nor should cattle or buffalo be	Move (e) ahead of (d) Replace 'or' with 'and'	70. Partially accepted. Requirement reworded to take intent of comment into account.

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		moved even if they can walk unaided if this would cause them pain or distress		
7.10 e)		No reason to exclude other species from this requirement which spares suffering	e) for all species destroyed in situ if they cannot stand or walk unaided.	71. Not accepted. Sheep and goats may be lifted - this is allowable in OIE and many other animal welfare programs.
7.12			'potable' rather than 'palatable'	72. Not accepted. Potable refers to the ability for the water to be drunk safely. Palatable refers to other variables such as temperature. Water can be potable but the animals will not drink if it is too hot.
7.12	Paragraph 1	All animals have to be able to access water at the same time	Clean, palatable water shall be available and accessible to all animals at all times and simultaneously	73. Not accepted. Not practical for all animals to access simultaneously. It is reasonable for animals to take turns.
7.13		'All animals held over 12 hours shall be provided with feed'. We do not support this interpretation of OIE Article 7.5.4 (6) which states: Waiting time should be minimised and should not exceed 12 hours. If <i>animals</i> are not to be slaughtered within this period, suitable feed should be available to the <i>animals</i> on arrival and at intervals appropriate to the species. This should specify that if the <i>intent</i> is for animals to be held over 12 hours they should be provided with feed, not to wait 12 hours before providing them with feed.	All animals should be provided with feed on arrival unless they are to be slaughtered within 12 hours of receipt. The standards should specify appropriate feeding intervals for each species.	74. Partially accepted. Requirement reworded to take into account the intent of the comment.
7.13		Additional standards are required to	See OIE Article 7.5.3 and add	75. Not accepted.

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		<p>ensure all aspects of abattoir lairage design and construction as set out in OIE Article 7.5.3 are covered.</p> <p>For example, 7.5.3 2(b) specifies: passageways and races should be arranged in such a way as to permit inspection of <i>animals</i> at any time, and to permit the removal of sick or injured <i>animals</i> when considered to be appropriate, for which separate appropriate accommodation should be provided.</p>	standards to reflect missing wording	These elements are covered by 7.1 and 7.2. Requirement 7.13 is about access to feed. With reference to 7.5.3. 2(b) of the OIE Code, this focuses on design of lairage, whereas the LGAP Standards focus on outcomes in existing facilities.
7.13	Paragraph 1	All animals shall have access to feed simultaneously	<p>All animals held over 12 hours shall be provided with feed. Each animal shall have access to feed at intervals appropriate to their physiological needs and at least once in every 24-hour period and they should be able to access feed all at the same time</p>	76. Not accepted. Not practical for all animals to access simultaneously. It is reasonable for animals to take turns. Research has shown that it is the feeding management practices that affect access to adequate feed rather than minimum trough space.
7.13		The requirement uses the term 'appropriate'. This introduces uncertainty when the requirement is audited.	Either remove the word appropriate and reformulate the requirement or provide further guidance as to what appropriate means in the evidence section.	77. Partially accepted. Requirement reworded to take into account the intent of the comment.
7.19		Refers to Annex G 'potentially painful husbandry procedures' – the procedures list ear tagging, which is not performed under veterinary supervision here – could the list differentiate procedures that		78. Noted. These are as defined in OIE. These are broader than what is applicable under export as the Program can be applied in any

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		warrant veterinary supervision and those that could be supervised by an animal welfare officer. [] commented that some of the procedures listed do not seem relevant to exported livestock – eg castration and spaying, dehorning, de-budding, freeze branding, hot branding, tail docking. [] this is because of the broader scope for LGAP, which is not confined to exported animal only. Local animal conceivably could have these husbandry practices applied hence the inclusion in the Annex.		situation, not just export. This clause does not require supervision, but guidance.
8.1		Does this requirement require an evidence of reconciling the numbers sent and received, and in the audit evidence is it the Auditors role to do this?	Confirm whether this requirement is to include reconciling the number and reword requirement as appropriate with further clarity on the auditor's roles in the audit evidence.	79. Noted. Reconciliation is not a requirement of the Operator or Facility but rather a tool that the auditor can use to test if documents and records are being accurately maintained.
8.1 f)		List item f) requires the recording of the relevant LGAP certification number and the time spent in such a site. In some cases the originating site will not have a LGAP certification number, for example where the livestock are coming from a local source of supply.	Change list item f) to:	80. Accepted. Amended to remove reference to LGAP Certification Number on f as transit sites would not be certified.
8.3		Refers to Level 1 and Level 2 certification but no prior explanation in the standard about what it means. For clarity, could the reference to certification be asterisked, and a footnote added referring readers to page reference or relevant document where the certification levels are		81. Accepted. Refer comment 7.

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		explained.		
8.3	Livestock at a single facility that come from LGAP and <u>non-LGAP sources, and/or from different LGAP levels</u> (1-3)	The likelihood of mistakes or fraudulent practices at a facility which operates different levels of LGAP welfare/auditing is fraught. This has already been acknowledged through the ESCAS system where Department investigations have been undermined by such difficulties. Such overlap calls into question the commitment to higher animal husbandry standards of any such (multi LGAP level) facility, and ultimately may undermine the credibility of LGAP and the confidence in the system by retail customers or the community.	Remove the ability for an accredited LGAP facility to process animals that are not part of the LGAP system, and to require them only to process animals at the level of the highest LGAP system to which they are accredited (not below).	82. Not accepted. This is an important allowance in order for LGAP to improve the welfare of all animals regardless of origin. To prohibit the management of livestock that are outside of the LGAP system, may result in Facilities not choosing to be certified at any level which is a worse animal welfare outcome. Many programs allow such 'parallel operations' under LGAP, this is considered in the Facility's risk assessment in order to encourage adoption of LGAP and Levels for all animals.
8.4		'reasonable request'? – could an example of what is reasonable be provided (eg 24 hours notice, or within 2 working days etc)		83. Not accepted. The requirement specifies 'immediate' as the timeframe. The 'reasonable request' relates to whether the information requested falls into the interests of the requester.
8.4		Needs re wording to say what is meant exactly – livestock owners, suppliers?		84. Not accepted. The requirement is as specific as it can be as it is highly dependent on the situation.
8.6		A question was raised as to whether this requirement was applicable to Operators or Facilities, and instead it is adequately covered in Annex B.8.1.	Consider deleting this requirement as it may be adequately covered in B.8.1.	85. Not accepted. This is the requirement for the Operator or Facility consolidating animals prior to loading.

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9		World leading expert in animal behaviour, Professor Temple Grandin, has reported that research agrees that throat-cutting without stunning does not induce instantaneous unconsciousness ¹ . HSI therefore strongly urges for LGAP Standard 1001 to be amended to make stunning (rendering an animal unconscious and insensible to pain) before slaughter mandatory for all livestock.		86. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. Professor Temple Grandin has reviewed the Standards and has also publically commented that slaughter without stunning can be done humanely.
9		At the very least if a form of Live Export continues I would want to see- firstly All and Absolutely only All Fully Stunned Slaughter with no exceptions.		87. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9		I would prefer to see our animals		88. Not accepted.

¹ Grandin, T. and Smith, G.C., 2004, Animal welfare and Humane Slaughter, Department of Animal Science, Colorado State University, available online <http://www.grandin.com/references/humane.slaughter.html>

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		processed here, where the law is to stun ALL animals. As we know in live export this is not the case. I am strongly opposed to any system that does not have stunning as mandatory.		The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.1		The equivalent LGAP standard could not be readily located for ESCAS Animal Welfare Standard 24 – “The head must be restrained in a manner which facilitate slaughter and for as short as time as possible, in no case for longer than 10 seconds.”	It would help if a reference to ESCAS AWS 24 was listed as a reference for LGAP standards 9.1 and 9.3.	89. Accepted. These are covered by 9.1 and 9.3 so reference has been added.
9.1		Does not adequately reflect the wording of Article 7.5.2 4(b) Methods of <i>restraint</i> causing avoidable suffering should not be used in conscious <i>animals</i> because they cause severe pain and stress	Add new point to beginning of list: (a) does not cause avoidable suffering	90. Not accepted. Adequately provided under list item a) acceptable methods and c) avoiding unacceptable practices.
9.1	Animals shall be restrained for stunning or slaughter	It is well established that slaughter of animals without pre-stunning causes suffering. Internationally-accepted scientific evidence, and Australian government-commissioned reviews in recent years have confirmed this.	Facilities that do not stun animals must not be accredited under LGAP. Non-stun slaughter needs to be listed as an unacceptable practice, and no longer listed as acceptable at <u>any</u> LGAP level (i.e.	91. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. This is an important allowance in order for LGAP to

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	(without stunning) using a method that:....	<p>That OIE allows it only highlights the inconsistencies within those Guidelines. That LGAP will allow this (at level 1 and 2, with 2 being ESCAS/Australian standard) indicates it too is inconsistent. LGAP principles 2.3 (equipment should not cause harm), 2.5 (practices should be implemented to reduce risks to animal health and welfare) and 2.7 (restraint, stunning and slaughter practices should be carried out in a considerate and effective manner) cannot be achieved if animals are not stunned prior to the throat cut. The LGAP accreditation of facilities that practice non-stun slaughter will undermine the credibility of LGAP. Conversely if LGAP was to require stunning prior to all slaughter in LGAP-accredited facilities, it could contribute significantly to the lifting of standards in such facilities.</p> <p><u>N.B.</u> the absence of comment on some sections (e.g. in Annex E and H) does not imply acceptance – <u>our opposition to non-stun slaughter is universal, regardless of restraint device/practice, LGAP level or species.</u></p>	not at 1 or 2 either).	<p>improve the welfare of all animals regardless of origin. To prohibit non stun slaughter totally, may result in Facilities not choosing to be certified at any level which would be a worse animal welfare outcome.</p> <p>The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.</p>
9.1	headline	I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can be performed without undermining religious requirements.	Animals shall be restrained for stunning or slaughter (slaughter without stunning must not occur) using a method that:	92. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and

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				Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.1		I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can be performed without undermining religious requirements.	This shall only apply in Emergency Cases: ADDITIONAL REQUIREMENTS FOR ABATTOIR FACILITIES (SLAUGHTER)(NON STUN)	93. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stunned slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.2	Paragraph 1	Record would permit an assessment of the problem and corrective measures	Breakdowns and delays shall be recorded	94. Not accepted. The focus is on ensuring animals are not kept in raceways, not the recording of a breakdown. The requirement to ensure equipment/facilities are inspected, maintained and fixed etc is already covered in other sections.
9.3		The equivalent LGAP standard could not	It would help if a reference to	95. Accepted.

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		be readily located for ESCAS Animal Welfare Standard 24 – “The head must be restrained in a manner which facilitate slaughter and for as short as time as possible, in no case for longer than 10 seconds.”	ESCAS AWS 24 was listed as a reference for LGAP standards 9.1 and 9.3.	See comment 89.
9.3		Head restraint for maximum of 10 seconds should be a verifiable target not just an example of evidence	Move to 'requirement'	96. Not accepted. Turning this into a requirement may have an adverse welfare outcome as operatives 'rush' to meet 10 seconds - feeling the pressure to stun the animal within this time to avoid a nonconformity even if the animal is not in the optimum position. Covered adequately by 9.3
9.4 - 9.5		Should 9.5 go before 9.4? ie: it needs to be monitored, then define what is being monitored?	Switch 9.4 and 9.5 around	97. Accepted. Requirements rewritten.
9.4	Paragraph 1	3% according to Temple Grandin. Record would allow to monitor data	Cattle shall be restrained for stunning or slaughter (without stunning) in a manner so as to ensure the vocalization target of 3% is not exceeded. Vocalisation should be recorded	98. Not accepted. Incorrect. Temple Grandin refers to 5% where restraint is used, not 3%. Recording of vocalisation is captured already under 9.5.
9.4	Headline	I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can be performed without undermining religious requirements.	Cattle shall be restrained for stunning or slaughter (slaughter without stunning must not occur) in a manner so as to ensure the vocalization target of 5% is not exceeded.	99. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is

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				taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.5		Evidence references indicators of distress but is this requirement only related to vocalization in cattle?	Either make this applicable to all (ie take it out of this section and add to general section) and define indicators of distress, or, if only for vocalization in cattle amend first point of evidence to: <ul style="list-style-type: none"> • Vocalisation during restraint is recorded. 	100. Accepted. Requirements rewritten.
9.6		Is this clear that corrective action must be taken? This only requires that monitoring verifies it is taken but does not state it must be taken.	Where the target in 9.5 is exceeded: a) corrective action shall be taken; and b) monitoring shall verify that such corrective action was taken.	101. Partially accepted. Requirements rewritten. See 100.
9.7		Standard 18 in the ESCAS Animal Welfare Standards (AWS) requires stunning equipment to be correctly applied, with the appropriate charge/pressure/electrical setting used for each animal. Evidence of compliance includes stunning equipment applied in the correct position (as described in OIE animal welfare standards). For LGAP, the requirement is in clause 9.7 which refers to		102. Accepted. Please see the amended Annex F.

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		Annex F and details permitted methods of stunning for different species. However, details about equipment being applied in the correct position are not included in the annex. Our collective view is this would be useful information and should be included in the LGAP clause (unless there are reasons it has not been, for example, it is available in another section).		
9.7		Additional standards are required to reflect limitations of different stunning methods as standards. This should include suitable species for each method, placement and stun to stick intervals.	See comments on Annex F	103. Noted. See comments on Annex F which has been reviewed and any appropriate changes made.
9.8		The backup stunning device should exceed or match the specifications of the primary stunning device; for example if the primary device is a non-penetrative captive bolt the back-up device is a penetrative captive bolt.	A back-up stunning device equivalent to or exceeding the specifications of the primary stunning device shall be available for immediate use	104. Accepted. Requirement amended.
9.11		X missing from Abattoir column	Insert x in abattoir column.	105. Accepted.
9.13			'exceeded' should be replaced by 'not met'	106. Partially accepted. Requirement reworded.
9.13		Is this clear that corrective action must be taken? This only requires that monitoring verifies it is taken but does not state it must be taken.	Where the target in 9.9 is exceeded: a) corrective action shall be taken; and b) monitoring shall verify that such corrective action was taken.	107. Accepted. Requirement reworded.
9.14		Requirements related to insensibility and stunning. A pilot participant answered 'Yes' and then included a comment "we do not monitor", which means the answer should have been 'No' and a NC/CAR		108. Accepted. Requirement reworded.

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		raised. It is possible that the requirements regarding checking and monitoring sensibility after stunning need to be reviewed?		
9.14		Use of the term insensibility and sensibility is confusing - no definition of either provided. Evidence also references both. Only definitions is signs of effective stun and death.	Define insensibility and sensibility.	109. Not accepted. Remove terms sensibility and insensibility and replace with already defined terms eg: Consciousness = sensibility. Unconsciousness = insensibility.
9.14		New requirement as there is a target in 9.14 that says 100% of animals need to be stunned insensible during bleeding.	Livestock shall not show signs of sensibility in the period between the end of the stunning process and death.	110. Partially accepted. This is already covered by 9.9 and 9.10, which require animals to 'show signs of effective stunning at time of slaughter' and no animals 'to show signs of recovery before death'. Reference to percentage target removed and replaced with 'All'.
9.14		This seems awkward, is it possible to remove 'where stunning is used' given it is in the stunning section? If the above comments are accepted, then change as per suggestion.	In the period between the end of the stunning process and death, sensibility shall be monitored: a) using the sampling techniques and frequencies detailed in xxx b) by recording the number of animals showing signs of sensibility before death; and c) to verify that where animals show signs of sensibility, corrective action is taken.	111. Accepted. Requirement reworded.
9.16	General	Test knife sharpness by slicing a sheet of		112. Accepted. Added to

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	Requirements for Abattoir Facilities (slaughter)	standard A4 printer paper dangled by one corner. Knife must be dry.		evidence.
9.17		Validated procedures for checking death should be specified in the standards		<p>113. Not accepted. As per international guidelines for writing Standards they should be outcome based, not procedural.</p> <p>LGAP 1002 requires documented information (eg procedures) in relation to this. The validated procedure will be verified during the audit process. It may be specific to the plant and based on factors such as line speed, stunning method etc.</p>
9.18	(b)	<p>Scientific research indicates that could still carry a living foetus longer than five minutes after the dam is bled out at slaughter. See: Van der Valk J, Mellor D, Brands R et al (2004) The humane collection of fetal bovine serum and possibilities for serum-free cell and tissue culture. Toxicology in Vitro 18:1-12. Mellor DJ (2010) Galloping colts, fetal feelings, and reassuring regulations: Putting animal-welfare science into practice. JVME 37(1):94-100.</p>	Foetuses shall be removed from the uterus no sooner than 20 minutes after the slaughter of the female	<p>114. Not accepted. AVA and OIE guidelines are the basis for this requirement which have considered scientific research, including the minimum five-minute timeframe.</p> <p>AVA guidelines state – ‘<i>the foetus should not be removed from the uterus until at least 5 minutes after the cow is slaughtered. At this stage, the foetus should be unconscious.</i></p>

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				<i>A foetal heartbeat will usually still be present and foetal movements may occur. These are only a cause for concern if the exposed foetus begins to breathe air'</i>
9.18	Paragraph 1	To monitor data add letter d)	If females are found to be pregnant at the abattoir, then: a) they shall be handled separately; b) foetuses shall be removed from the uterus not sooner than five minutes after the slaughter of the female; and c) foetuses shall not be rescued. d) Pregnant females and foetuses shall be recorded	115. Not accepted. Recording the presence does not contribute to animal welfare.
9.19		[] advised that if females are found to be pregnant at the abattoir and a live foetus is identified after she is slaughtered, the foetus should be removed 20 minutes after slaughter and killed immediately using a captive bolt.		116. Not accepted. See comment 114, and as there are questions over the effectiveness of captive bolt on small animals, the clamping of the trachea is preferred.
9.19		This standard requires further specificity on how foetuses should be killed. The use of a captive bolt is the surest way to ensure a humane death	If a live foetus is identified, it shall be immediately killed using a captive bolt	117. Not accepted. See comment 116.
9.19	Headline	Improve humane treatment if possible	If a live foetus is identified, it shall be stunned immediately if practically possible and prevented from inflating its lungs and breathing air.	118. Not accepted. See comment 116.

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9.21	<p>For slaughter without stunning, the throat shall be cut <u>using a single, deep, uninterrupted, fast stroke</u> of the knife. NOTE Single means the blade does not leave the wound until the act of slaughter is completed.</p>	<p>See arguments above (9.1) regarding the unacceptability of non-stun slaughter. Regardless – it should also be noted that this definition must be made clearer to prevent the very common practice of 'sawing' at a throat. The blade may not 'leave' the wound, but the animal's throat will sustain multiple passes during the initial slaughter event, prolonging the experience, and indicating a failure of equipment or slaughterer's skill. If stunning occurs this is an academic argument as the animal will be unconscious and unable to experience pain/distress.</p>	<p>Clarify the definition of a 'single...stroke' to ensure slaughtermen, managers and auditors are clear that sawing is not acceptable.</p>	119. Accepted.
9.21		<p>I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can be performed without undermining religious requirements.</p>	<p>This shall only apply in Emergency Cases: For slaughter without stunning, the throat shall be cut using a single, deep, uninterrupted, fast stroke of the knife. NOTE Single means the</p>	120. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is

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			blade does not leave the wound until the act of slaughter is completed.	taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.22	(b)	Inspection of the wound should be visual. Contact with the severed edge of the skin should only be permitted under (c)	b) inspection of the wound shall avoid contact with the severed edge of the skin	121. Accepted.
9.22	(c)	OIE guidelines emphasise the need to discourage the practice of removing 'hypothetical blood clots just after the bleeding' as this 'may increase animal suffering'. Need to ensure action is only taken when clots are present and occluding the vessels.	Add advice on signs of occlusion and what is 'a strong flow of blood' versus 'flow is not sufficient'	122. Partially accepted. 9.22 c) reworded to reinforce '...a strong flow of blood' rather than '...blood flow is not sufficient'. Requirement is currently worded to discourage removal of blood clots also without over complicating the requirement with less known terms such as occlusion.
9.22	c)	point c) – agree that this is important, but would there be monitoring of this measure in the company operations manual to ensure slaughtermen are appropriately trained so the point c is a rare event		123. Noted. This is addressed by other requirements related to sharp knives and slaughtermen competence, and use of checks.
9.22	Non-stun slaughter c) action	Whilst this is clearly necessary if the initial throat cut is not adequate, this highlights again the terrible and unacceptable suffering that is caused by non-stun	Non stun slaughter must not be permitted.	124. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows non stun

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	shall be taken to <u>re-cut the vessels</u> if blood flow is not sufficient or the carotid arteries have been missed with the initial cut;	slaughter of animals, and further elongated if or when the first cut fails. See above – non-stun slaughter has no place in the LGAP (nor ESCAS) Standards which purports through its 'principles' to 'reduce risks to animal health and welfare', and to use restraint and slaughter practices in a 'considerate and effective manner'.		slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
9.22	(f)	Nothing listed in 'Examples of Evidence' column. Should refer to Annex K and L. Annexes should contain checklist for work procedures.	<ul style="list-style-type: none"> • Observation and interview • Work procedures 	125. Partially accepted. Annexes now referred to. Standards are not prescriptive to the degree of specifying work procedures.
Annex A		(Internal) audits are listed in the examples above as part of the measures in place to ensure appropriate standards are upheld. An auditor not knowledgeable cannot perform their duty in relation to such matter.	Internal auditor shall be knowledgeable about: <ul style="list-style-type: none"> a) workplace requirements for maintaining flow and order of animals b) impact of stress and injury on the animal c) feed and water requirements where relevant 	126. Accepted. These have now been included in the table. Note the internal auditor competencies have been moved to LGAP 1003 as these relate to management system requirements not animal welfare.
Annex A		It is incomprehensible that this standard suggests an internal auditor would not be competent and skilled in the sub elements omitted from being ticked in the proposal.	Internal auditor shall be competent in: <ul style="list-style-type: none"> j) identify sick or injured animals (does not need to be competent in 	127. Partially accepted. Most of these skills have now been included in the table.

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		<p>These are fundamentally important matters to be assessed and confirmed as part of any internal audit. I object strongly against those not being in scope of an auditor's profile.</p>	<p>defining cause or type of illness, only ill versus not affected) k) identify out-of-specification animals m) identify signs and causes of stress in animals n) comply with workplace procedures and requirements for handling livestock and minimising livestock stress o) maintain flow of livestock with minimal livestock stress</p>	
Annex A	Livestock slaughtering	<p>Many of the restraint and slaughter methods permitted under these standards require a 'High level of operator competency' and/or 'proper design and operation of equipment' according to OIE Articles 7.5.6 and 7.5.9. This is not specified in Annex A. They are:</p> <ul style="list-style-type: none"> • Restraining and/or conveying methods • Restraining by inversion (noting that this does not meet the requirement of Article 7.5.2 4(b)) • All methods of stunning • Bleeding out by severance of blood vessels in the neck without stunning 	<p>Add new rows to table to specify requirement for personnel involved in livestock slaughtering to have a high level of competency in:</p> <p>q) operation and maintenance of restraint equipment r) operation and maintenance of stunning equipment s) operation and maintenance of slaughter equipment</p> <p>LGAP needs to specify these competencies and require documentation that operators have achieved the required level of competency for these methods.</p>	<p>128. Partially accepted. All extra competencies included. Level of competency has not been included as operatives are either competent or not. Documentation is already required under 4.2.</p>
Annex B.5.6		<p>There is a suggestion that transport operators should have standard operating procedures to address this requirement and the other requirements in Annex B. While this is a way that can be used to</p>	<p>Consider to what extent the requirements in Annex B need to be augmented with further specification that procedures must exist.</p>	<p>129. Not accepted. It is the outcome that is required not necessarily the procedures. Auditor training for this aspect.</p>

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		support demonstration of the requirement being fulfilled, having a SOP in itself does not mean the requirement is achieved.		
Annex B.5.8		Add – Jumping livestock off a truck without a ramp should be avoided.		130. Accepted. Jumping off added to requirement.
Annex B.5.9		Electric goads are not to be used during transport, however they may be used in loading and unloading transport vehicles. What is the logic of this inconsistency?	Revise this require to allow use of electric goads or determine whether requirement 7.7 needs changing.	131. Accepted. 7.7 and Annex B.5.9 adjusted to specify the requirements that must be fulfilled when electrical goads are being using, in association with transport or otherwise.
Annex C		Individual identification should be a requirement of all exported livestock species to allow for supply chain traceability.	Insert the following in columns 3 and 4: 'Required for cattle, sheep, goats, and buffalo.' Delete rows 2 and 3.	132. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows identification individually, with a unique identifier, or collectively, with a unique group identifier and this is reflected in the LGAP Standard. This is applicable to animals regardless of whether they are exported, imported or locally raised.
Annex C.1	Identificati on that is <u>individual to the specific animal</u> to which the identifier is	That this is required for Level 2/3 for cattle/buffalo is important and welcome. That it is <u>NOT required at any level for sheep and goats</u> will undermine LGAP as it currently undermines ESCAS investigations, and assists those in the industry who exploit this inadequacy. Until sheep (and goat) identification issues	LGAP (all levels) must require individual ID of all species (including sheep and goats).	133. Not accepted. The scope of the Standard must reflect at least the OIE Code which includes guidance on identification individually, with a unique identifier, or collectively, with a unique group identifier and this is

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	<p>applied and its application is permanent.</p>	<p>are addressed in the live export industry—these animals will continue to be sold from livestock markets to private purchasers. Aside from the inadequate and often cruel slaughter methods that these 'missing' sheep and goats are subjected to, they are also at risk of trussing and transportation in car boots at high temperatures and being penned without shade or adequate food and water. The Farmer Review (2011) recommended the industry work towards individual identification (of sheep). Similarly the ABARES NLIS RIS (2013) identified that identification was '<i>important for managing biosecurity, food safety, market access and animal welfare risks</i>'. The ABARES report noted the deficiencies of the current mob-based sheep identification system under ESCAS (and domestically) and put forward several options for improving the current NLIS. Option 3 was that all sheep and goats have an Electronic Identification Tag (EID, as for cattle), including those exported under ESCAS.</p>		<p>reflected in the LGAP Standard. This is applicable to animals regardless of whether they are exported, imported or locally raised.</p>
Annex E		<p>Secondly the complete abolition and prohibition of 'Inversion Slaughter boxes' and 'LegTrap hanging Slaughter'.</p>		<p>134. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows inversion. If leg trap hanging slaughter refers to the hoisting of conscious animals, this is prohibited under the LGAP</p>

Clause No./ Subclause No./ Annex	Paragraph / Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
				Standards. The inclusion of inversion is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.
Annex E		The use of the 'full inversion box' in live export is also unacceptable, as they are cruel and not used in Australia.		135. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows inversion. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods of restraint.
Annex E		The standards should require that all livestock are appropriately restrained for slaughter in a way that allows for effective stunning. The inclusion of all restraint methods listed OIE Article 7.5.6 is a retrograde step as this		136. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. This is not a retrograde step as LGAP maintains ESCAS requirements

Clause No./ Subclause No./ Annex	Paragraph / Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		<p>includes methods that do not meet the intent of Article 7.5.2 4(b) which states: Methods of <i>restraint</i> causing avoidable suffering should not be used in conscious <i>animals</i> because they cause severe pain and stress.</p> <p>These methods include rope casting, tying of legs, casting, hobbling; methods that are not permitted under ESCAS.</p> <p>The inclusion of inversion restraint under LGAP 2 should also be removed.</p> <p>See previous comments on the need to specify competencies for operators involved in restraint and slaughter.</p>		<p>for Level 2 for ESCAS, while also focusing on increasing the standards for local livestock. The inclusion of stunning and inversion is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.</p>
Annex E	Animals are grouped but no individual restraint <u>Group stunning</u> pen	<p>This should not be permitted (currently permitted LGAP Level 1 and 2) at any level for sheep and goats due to the inability to ensure an effective stun is administered. The application of stunning in an effective manner is reliant upon the animal and (usually) the head being held securely for sufficient time for the electrical or mechanical stun equipment to be applied.</p> <p>Further – group stunning means that individual animals may not be slaughtered in compliance with acceptable stun to stick intervals. Animals may recover consciousness before or during bleed out, with resultant suffering.</p>	Animals must not be permitted to be group stunned at any LGAP level.	137. Not accepted. This is not group stunning, this is group restraint which facilitates stunning of individual animals. Many systems use this type of restraint for certain stunning methods, even in commercial abattoirs in Australia and the United Kingdom.
Annex E	Body restrained	That this is permitted for sheep/goats for slaughter with or without stunning at LGAP	Casting/hobbling of sheep and goats at LGAP Level 1 must not be	138. Not accepted. The scope of the Standard

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	<u>Casting/hobbling</u>	level 1 will cause suffering to those animals prior to stun/slaughter and should not be permitted. Such distressing practices will bring the LGAP system into further community/customer disrepute (on top of its existing acceptance of non-stun slaughter). Note – we would have similar concerns/opposition to leg restraints (tying of 3-4 legs of sheep for slaughter) see below.	permitted.	must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. LGAP maintains ESCAS requirements for Level 2 for ESCAS, while also focusing on increasing the standards for local livestock through Level 1. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification.
Annex E	Body restrained Animal in <u>lateral position</u> - in a restrainer, cradle or crush	That this is permitted for sheep/goats/cattle for slaughter without stunning at LGAP levels 1 and 2, but not level 3 is telling - it causes suffering and high level customers would not consider it humane. In cattle (in particular, but not only) the casting of animals to the lateral position causes suffering, and is the reason it is not used for cattle in Australia. The use of Mark IV cattle slaughter boxes in some destination is unacceptable.	Animals must not be permitted to be restrained in a lateral position for slaughter without stunning (at any LGAP level).	139. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. LGAP maintains ESCAS requirements for Level 2 for ESCAS, while also focusing on increasing the standards for local livestock through Level 1. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification.
Annex E	Individual animal confinement but <u>no physical restraint</u> Animal upright	This should not be permitted (currently permitted at LGAP Level 1 and 2) for animals (sheep, goats, cattle, buffalo) due to the inability to ensure an effective stun is administered when the animals is not physically restrained. The application of stunning in an effective manner is reliant upon the animal and (usually) the head	Animals must be individually and physically restrained, including the head for stunning (at all LGAP levels)	140. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. Many systems use this type of restraint for certain stunning methods, even in commercial

Clause No./ Subclause No./ Annex	Paragraph / Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
	Individual stunning box	being held securely for sufficient time for the electrical or mechanical stun equipment to be applied. Without body and head restraint the stunner may not be effectively applied.		abattoirs in Australia and the United Kingdom. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification.
Annex E	Leg restraints <u>Rope casting: cattle</u> animals are cast in one movement and using a technique which avoids distress and injury	The casting (dropping to the floor using ropes) of cattle for slaughter will not consistently 'avoid' injury and will certainly cause distress. That this is permitted at LGAP level 1 will bring the LGAP system into further community/customer disrepute (on top of its existing acceptance of non-stun slaughter).	The casting of cattle for slaughter using any method must not be permitted under any LGAP level.	141. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. LGAP adds requirements to this to improve welfare of local animals that are currently restrained in this manner. LGAP maintains ESCAS requirements for Level 2 for ESCAS, while also focusing on increasing the standards for local livestock through Level 1. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification.
Annex E	<u>Restraint by inversion</u>	[] strongly urges for LGAP Standard 1001 to be amended so that the use of full inversion slaughter boxes are banned in all facilities operating under LGAP.		142. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification.

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				This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.
Annex E	<p><u>Restraint by inversion</u> Rotating box with fixed sides (e.g. Weinberg pen) - Slaughter without stunning</p>	<p>Inversion of cattle (any conscious animal) causes distress and suffering. That this is permitted at LGAP level 1 will bring the LGAP system into further community/customer disrepute (on top of its existing acceptance of non-stun slaughter). Indeed that this is not permitted under LGAP level 2 and 3 is telling – it causes suffering and should not be permitted.</p>	<p>Restraint of cattle by inversion must not be permitted at any LGAP level.</p>	<p>143. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.</p>
Annex E	<p><u>Rotating box</u> fitted with compressible sides and head restraint - Slaughter without stunning</p>	<p>Permitted for cattle for LGAP Level 1 and 2. That this distressing restraint is not permitted at LGAP level 3 is telling – it is unacceptable. Un-stunned slaughter of cattle causes prolonged pain and suffering, and full inversion slaughter boxes cause even greater pain and distress to the animals prior to and after the throat cut. The current ESCAS 'endorsement' of these cruel devices is inconsistent with existing</p>	<p>Inversion restraint for slaughter must not be permitted at any LGAP level.</p>	<p>144. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement,</p>

Clause No./ Subclause No./ Annex	Paragraph / Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		<p>Australian government animal slaughter policy, and ignores both: international scientific opinion which deems full inversion to be unacceptable; and the contradictory animal welfare indications in the OIE Guidelines themselves.</p> <p>Footage provided by [] of cattle in full inversion restraint devices in Israel, Gaza and in Egypt has shown in graphic detail that un-stunned cattle exhibit distress — vocalising and struggling in the device — during inversion, and before, during, and after the throat cut. The inversion itself is stressful for cattle and this cannot be eliminated merely by the manner in which the animals are handled or the way the device is operated. The full inversion slaughter method is inherently cruel. See further notes <u>below</u> on this important issue.</p>		<p>recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.</p>
Annex F		<p>The standards should require that all livestock are effectively stunned and rendered insensible to pain before slaughter.</p> <p>Annex F needs to cover all relevant clauses of OIE Article 7.5.8. As it stands there are several omissions, such as specifying what classes of animals can be stunned with non-penetrative captive bolts; placement of stunning equipment; parameters for buffalo; specifications for electrical stunning.</p>	Annex F needs to be expanded to cover all relevant clauses of OIE Article 7.5.8.	145. Partially accepted. OIE Article 7.5.8 has been reviewed and minor changes have been made to Annex F. Other aspects of Article 7.5.8 have been covered elsewhere in LGAP 1001.
Annex F	Column 4, Row 3	OIE Article 7.5.7 (5) specifies a stun-to-stick interval of 20 seconds, not 60.	Change stun-to-stick interval to 20 seconds	146. Not accepted. 20 seconds is for non-

Clause No./ Subclause No./ Annex	Paragraph / Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
				penetrating devices (as shown in Annex F) – OIE does not specify a maximum stun to slaughter interval for penetrating captive bolt at all, therefore other recommendations and research (eg. HSI) were drawn upon which refer to 60 seconds.
Annex H		The standards tend to emphasise unacceptable actions and/or procedures rather than the actions required. It may be useful to readers and users of the standards to know what actions should be implemented and adopted as well as actions to be avoided.		147. Noted. Refer response 2.
Annex H	<u>Unacceptable practices</u> - f) dragging, tripping, dropping or throwing;	Agreed that these are unacceptable practices. However, this indicates the inconsistencies in this LGAP animal welfare standard where casting conscious animals onto their sides for slaughter is permitted by LGAP. See above.	See above – casting must not be permitted at any LGAP level.	148. Not accepted. The scope of the Standard must reflect at least the OIE Code which allows all methods of restraint listed in LGAP. The inclusion of this method is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to other methods.
Annex H	<u>Unaccept</u>	Agreed that these are unacceptable	See above – electric prods must	149. Not accepted.

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	able practices - i) use of livestock handling tools in a manner that causes harm, distress or injury to the animal;	practices. However, this indicates the inconsistencies in this standard where the use of electric prods on animals is permitted by LGAP despite the clear risk to animals. See above.	not be permitted by LGAP.	The scope of the Standard must reflect at least the OIE Code which allows the use of electric goods in certain situations, which is mirrored in the LGAP Standard. This is common in many animal welfare programs and is seen in many countries. There are valid reasons for their use - such as a risk to humans - the importance is controlled use.
Annex H	Unacceptable Practices and Procedures	Add Q. The following methods of restraint are not acceptable: suspension by the limb or limbs, devices designed to cause animals to fall (trip floor boxes) and leg clamping boxes.		150. Accepted.
Annex I	Monitoring in the abattoir - all species	For very large operations a fixed limit may become poorly representative at high numbers.	Number of head exceeding 500 shall have sample size of 10%, but no less than 100	151. Partially accepted. Sample sizes revised but considered against those recommended by Temple Grandin and AMI.
Annex I	Monitoring loading and unloading from land transport vehicles	Inspecting one animal of 100 is not a representative sample and can easily lead to selective sampling. This is an issue even at 20 or 30%	Ideally every animal is assessed individually. At minimum I recommend number of head to be evaluated relative to number of head in total: 50-100 = 30% 100+ = 20%	152. Partially accepted. Sample sizes revised but considered against those recommended by Temple Grandin and AMI.

Livestock Global Assurance Program (LGAP) Standards – Public Comment Determinations (Redacted)
LGAP 1002, Livestock assurance – Requirements for the management system of Operators and Facilities

Standard Number:	1002	Standard Version Number:	Public Comment Draft Version 0.8
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Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
All	All	Check that 'x' for Exporters is in the right column.		1. Accepted. A new 7.6 b) has been added explicitly for Exporters and Importers in relation to capacity planning. Also a reordering of the list items in 7.6 has been undertaken.
All		Monitoring requirements and measurements. The standard needs to be clear when the use of monitoring is required and who is to undertake it, especially in relation to % thresholds for slips, falls, vocalisation, sensibility after stunning, loss of consciousness etc. Is it a continuous process for the Operator or Facility whenever they have livestock, or only undertaken in the context of an audit.		2. Accepted. Minor editorial changes made.
OTHER	OTHER	Current public comment for draft LGAP standards is in English. I am unsure any invitation to the importers for comment on draft LGAP.	It is suggested to translate the proposed standard in multi-languages, and consult with importers in Indonesia, Vietnam....etc to get their involvement and hear their voice. In addition, Importer operators will	3. Noted. The Draft Standards were part of the R&D project, which did not include translation into other languages. The public comment period was open to all Operators and Facilities anywhere in the

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
			involve in 3 elements: "Chain of Custody", "Management system" and "Animal Welfare and Management" under LGAP standard. Their involvement and cooperation are the importance to move the standard forward as a result in worldwide accreditation standard like ISO 9001' s.	world. There is an Importer representative on the Standards Committee. There has been significant consultation with in-market stakeholders (among others) as part of the broader research project.
OTHER	OTHER	Documentation information/evidence required to provide in LGAP standard	It is suggested to accept hard copies and electronic form because it is very common to store all official documents (eg SOP) in electronic form for easily retrieve, read and sharing for use.	4. Noted. Refer the definition of 'documented information' in LGAP 1000 which means the information can be in any form, electronic or otherwise.
OTHER	OTHER	At present, exporters pay substantial audit fee to audit companies per ESCAS audit requirement, but it found the auditors have limited ESCAS knowledge and experience to work for ESCAS audit. As a result, the audit reports haven't reflected the actual situation.	It is suggested to develop new standard (for example LGAP 1004) to manage the performance of the external audit companies by LGAP committee. The exporters and other operators have a full understanding how LGAP committee select the external audit companies, and how to monitor the auditor's performance to undertake LGAP audit requirements (for example, annual assessment to the auditor)	5. Noted. Auditor competence and selection of approved certification bodies and auditors are provided for in the LGAP Certification Rules. Following international practice the standards contain requirements applicable to Operators and Facilities, and the Rules cover the auditing and certification process. Ongoing monitoring of the performance of approved certification bodies and the auditors is visible through the LGAP Conformance System and the responsibility of the Program Owner.
Introduction		The two options are listed but no		6. Accepted.

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		<p>explanation why. This section would benefit from including in the introduction to LGAP 1002 that existing ISO management systems 9001 which include LGAP in their scope can be utilised, or alternatively, facilities can apply option A as set out in clause 4.2.</p>		Added.
4.1		<p>Strong support for the inclusion of two options as to how a management system may operate. The option enables for the various bodies within LGAP a sufficient degree of flexibility to be able to achieve the required outcomes of the program. It is essential that bodies within the program can demonstrate their compliance however is appropriate to their situation/ environment.</p> <p>The need to bodies to have flexibility is essential and will be very important in getting uptake of the program.</p>	-	7. Noted.
4.2		<p>The two options are listed but no explanation why. This section would benefit from including in the introduction to LGAP 1002 that existing ISO management systems 9001 which include LGAP in their scope can be utilised, or alternatively, facilities can apply option A as set out in clause 4.2.</p>		8. Noted. See response 6.
4.3		<p>The two options are listed but no explanation why. This section would benefit from including in the introduction to LGAP 1002 that existing ISO management systems 9001 which</p>		9. Noted. See response 6.

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		include LGAP in their scope can be utilised, or alternatively, facilities can apply option A as set out in clause 4.2.		
6.1		[] supports the introduction and mandatory use of live video surveillance in all areas where livestock are handled – this should be reflected in LGAP Standard 1002.		10. Not accepted. In accordance with international standards setting practices from ISO and WTO, the LGAP Standards are outcome focused and do not prescribe specific methods or technologies. Furthermore, in some jurisdictions the use of video surveillance is covered by work place regulations and there is variability around the use of this technology. As such the LGAP Standards cannot prescribe the use of this technology in all cases. The use of video surveillance is however, a consideration in the risk assessment that applies for each Operator and Facility.
7.1-7.7	All	It seems some requirements/evidences provided under “Documented Information” are similar to or duplication with another clauses’ requirements/evidences. For example, “Clause 7.6a requires the documented information (eg SOP) for processes and procedures for monitoring” is same as/similar to the “documentation information (ie SOP) under Clause 6.1 Processes and risk”.	It is suggested your committee to go through whole Clause 7 requirements again to seek any feasibility to reduce the duplication requirement under LGAP. Or consider to remove “Clause 7 Documented Information” as most of documented information have been required to provide as evidences under other clauses. I understand the development and formatting of LGAP standard is based on ISO guideline/formatting.	11. Not accepted. These requirements do not duplicate the need for ‘documented information’. The same piece of documented information can be used as evidence to demonstrate fulfilment of multiple requirements. Furthermore, requirements 7.1 enables the Operator or Facility to determine its level of documented information that is appropriate to its circumstances. In addition,

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			<p>However, we should consider how to simplify the standard and let the final readers easily to read and understand. Please consider that large number of LGAP readers/users are the offshore facilities. Most of them are small family business, and some owners/operators are illiterate. When developing the standard, please consider the characteristic of readers. If the standard is too complicated and difficult to read, it may become an obstacle to move LGAP forward or internationalization.</p>	<p>documented information can be in various forms and does not mean only hard copy documents or records.</p>
7.1 b)		<p>Auditor commented 'How would auditor determine if effective, requirement says does 'exporter consider effective'.</p>	<p>Consider whether the requirement is correct in giving the Operator of Facility the prerogative to determine what is effective.</p>	<p>12. Not accepted. Refer the note in the requirement in the Standard. The Operator or Facility must demonstrate the documented information is effective.</p>
7.6 a)		<p>List item a) not relevant to Exporters.</p>	<p>Ensure 'x' is not in Exporter column.</p>	<p>13. Accepted.</p>
7.6 a)		<p>Examples of good documentary evidence.</p>	<p>Add to examples of evidence: "Standard Operating Procedures (SOPs), flow charts and pictograms that may be developed or adopted in-house or supplied by Operators or the LGAP Program Owner".</p>	<p>14. Accepted.</p>
7.6 d)		<p>I object to slaughter without stunning, as demonstrated in Australian and many overseas facilities, stunning can</p>	<p>processes and procedures for stunning and slaughter (note: slaughter without stunning must not</p>	<p>15. Not accepted. The scope of the Standard must</p>

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		be performed without undermining religious requirements.	occur) which shall include, where appropriate	reflect at least the OIE Code which allows non stun slaughter. The inclusion of stunning is taken into consideration in a Facility's risk assessment and Levels of certification. This approach encourages continual improvement, recognises the economic, legal and technological limitations of less developed countries and fosters a shift over time to stunning.
7.6 f)		In some cases external traceability systems are used by Operators. As such the processes or procedures within the Operator should clearly indicate the use of the external system, and the external system needs to be able to demonstrate fulfilment of the requirement.	Add the comment to the evidence section of this requirement.	16. Accepted.
8		<p>The monitoring requirements are well balanced as they ensure that Facilities/ Operators are constantly reviewed while not being unduly onerous.</p> <p>Of particular importance is the requirement that Facilities/ Operators are able to justify non-compliances and illustrate the actions that have been undertaken to rectify. This level of monitoring will drive continually improvement through ensuring issues are addressed and changes are made to ensure that non-conformance do not reoccur.</p>	-	17. Noted.

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
8.1 a)		Monitoring is an important part of the standard. A suggestion has been raised in the pilot that there needs to be greater precision about monitoring and that procedures should be required.	Consider whether the current wording is sufficient or more prescription is required.	18. Accepted. Minor amendments added.
8.3		What are the KPIs being referred to? If they are the % thresholds for animal handling (slips, falls and vocalization), or stunning, insensibility, unconsciousness etc, then this should be made more explicit.	Determine whether this require is still relevant and if so confirm what KPIs explicitly mean. Not the use of the term 'targets' in 8.4.	19. Accepted. Minor amendments added.
9		The requirement of an annual review of the management system is essential to driving continual improvement. The requirement of a review will ensure that Facilities/ Operators are constantly analysing their policies and systems for demonstrating compliance. This will ensure that they are continually monitoring their performance and improving.	-	20. Noted.
10		Excellent that the Standards require internal audits of the management system to be undertaken. The collection of information from these audits will ensure that bodies within the certified supply chain are monitoring and demonstrating their compliance. This approach is preferred to compliance only being tested during external audits. Additionally, the breakdown in the requirements of the self-audit, with the		21. Noted.

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		inclusion of frequency, methods and breakdown of responsibilities, will assist Facilities/ Operators in correctly tracking their progress.		
10.1		Should the requirement include consideration of discrepancies between internal and external audit findings and nonconformities.	Add the issue of discrepancies if thought relevant.	22. Noted. This is a provision in the LGAP Certification Rules.
10.2 a)		A minimum frequency for internal auditing shall be stipulated.	plan, establish, implement and maintain an internal audit programme(s) including the frequency (at minimum bi-annually), methods, responsibilities, planning requirements and reporting, which shall take into consideration the requirements of the LGAP Standards, the importance of the processes concerned, customer feedback, changes affecting the organization and the results of previous internal audits and external evaluations;	23. Partially accepted. This is specified in 10.1 with reference to the LGAP Surveillance Frequency Schedule that is stipulated in the LGAP Certification Rules. The schedule covers the frequency of both internal and external audits. The surveillance frequency is based on the risk rating of the Operator or Facility. A note has been added to explain this.
10.2 c)		Only qualified (trained and refresher-trained) personnel shall perform audits.	select qualified internal auditors and conduct internal audits to ensure objectivity and the impartiality of the process;	24. Partially accepted. This has been addressed by including the LGAP 1001 Annex A competence table with reference to internal auditors into a new Annex in LGAP 1002. The requirement is reworded to reflect that change.
11.1		The process required for reporting the occurrence of nonconformity is thorough and ensures that Facilities/		25. Noted.

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		Operators are taking action to not only remedy the negative situation but also actively learn through the review process.		
11.3		The requirement for documented information, as evidence will ensure that non-conformances are addressed correctly.		26. Noted.
11.4		Supportive of the requirement to continually review the management systems and this will drive continual improvement and compliance.		27. Noted.
11.4		More guidance was requested during the audit on what to look forward as evidence of fulfilment.	Expand the evidence section to provide more examples of evidence to demonstrate fulfilment of the requirement.	28. Accepted. Added to evidence "The absence of systematic and repeated nonconformities."

Livestock Global Assurance Program (LGAP) Standards – Public Comment Determinations (Redacted)
LGAP 1003, Livestock assurance – Requirements for Operator chain of custody

Standard Number:	1003	Standard Version Number:	Public Comment Draft 0.6
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Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
4.1		Supportive of the requirement that livestock can only be sent through Operators/ Facilities that are certified under LGAP. This requirement is essential to making the system a viable option and is necessary to ensuring good animal welfare outcomes.	-	1. Noted.
4.2		Based on the answers provided by the Auditors it is not clear whether the jurisdiction being referred to includes downstream jurisdictions or just the jurisdiction in which the Exporter is based.	Clarify the extent of jurisdiction covered by this requirement.	2. Partially accepted. Minor editorial changes made to improve clarity.
4.3		Maintain traceability system	In long term, LGAP should develop a database system similar to NLIS to record all offshore traceability record. For example, there are more than 3-4 electronic traceability system in []. The procedures how to record the RFID are totally different with each other. It is hard and confusion for the abattoir operator to follow different system to record the	3. Noted. The establishment of a centralised traceability system is outside the scope of the R&D project that is developing LGAP.

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			<p>cattle from 5 different exporters. Exporter A's system requires to scan RFIDs before slaughter, but Exporter B's system requires to scan RFIDs after slaughter. Please put yourself in their situation. You can imagine how confusion and difficulties for operators to work for various electronic traceability systems in the industry. It is suggested to standardise the traceability system in one system, which will be cost effective and reduce the complexity to work for traceability offshore.</p>	
4.3		<p>Supportive of the requirement that the Operator is required to use and maintain a system that results in the traceability of all animals throughout the supply chain.</p> <p>This requirement is vital to ensuring that good animal welfare is maintained, but the requirement allows for flexibility through enabling different systems to be used. The allowance of differing systems enables the Standards of strike a balance between ensuring high quality outcomes but also enabling differing systems to be utilised when appropriate, depending on the environment.</p>	-	4. Noted.
4.3		"The operator shall use and maintain a system that results in the		5. Noted. The focus of LGAP is on the two

Clause No./ Subclause No./ Annex	Paragraph/ Figure/ Table/ Note	Comment (justification for change) by the Organization	Change to the text proposed by the Organization	Standards Committee Determination
		<p>traceability of all animals throughout the supply chain". There is a lot of reference to traceability and I can see this will create potential major hurdles because it involves commercial information at the end of the day. If LGAP works the pivotal issue should be I.D. as this leads to traceability if needed. Sheep are mob based and must stay so; therefore their movements throughout a supply chain cannot be followed unless there is a major welfare conflict. Again I.D. is the important factor as traceability can follow.</p>		<p>enablers of traceability being 'identification' and 'movement recording'. LGAP does not propose to keep commercial information, this remains a matter for contractual arrangements between Operators and Facilities. OIE includes guidance on such systems including 'mob-based' traceability and this has been reflected in LGAP.</p>
4.3	<p>EXAMPLES OF EVIDENCE point 3</p>	<p>I don't agree the example 3 legally enforceable agreements with Certified operators and Certified Facilities as an evidence to be reviewed during an audit.</p> <p>Under current ESCAS, exporter requires to have contractual arrangement with importers and approved facilities to ensure the offshore facilities to follow ESCAS requirement/procedures. The agreement maybe just a formality, and the agreement may not be legally enforceable overseas because of different legal system in other countries. However, the requirement to have legally enforceable agreement involves a huge number of documentations</p>	<p>It is suggested to use another form of declaration replacing current agreement model. It is suggested to develop a declaration to request the operators and facilities to confirm their acceptance and follow LGAP requirements, instead of current contractual agreement between exporters, importers and facilities. The declaration is one mandatory document required operators and facilities to sign back to LGAP committee in order to obtain the certified status.</p> <p>As a result, each certified operator and certified facilities only requires to sign back one declaration to LGAP rather than signing 30 abattoir agreements []. It will</p>	<p>6. Partially accepted.</p> <p>Removal of the words 'legally enforceable' and inclusion of 'declarations' as evidence. The use of legally enforceable agreements are examples of evidence only, they are not requirements. In being certificated under LGAP, the Operator and Facilities must sign a declaration with the Program Owner to adhere to the requirements of the Program. However, agreements would still be required between Operators and Facilities to be equivalent to the control requirement under ESCAS. LGAP cannot cover commercial arrangements between supply chain participants as it could be considered to be trade restrictive or</p>

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		<p>and duplication between exporters, importers and facilities. For example, [] That's totally 30 sets agreements required by [] to sign back. However, the content/conditions in [] Agreement [] maybe very similar to each other.</p>	<p>reduce a lot of duplication on documentations/agreements between exporters and importers and facilities []</p>	<p>collusive.</p>
4.4		<p>The need for contingency plans clearly illustrates the primary importance of animal welfare to the industry. The need for such plans ensures that even in adverse situations the program will be seeking to protect animal welfare.</p>	-	7. Noted.
4.4 a)		<p>This begs the question about traceability compliance which in my view will cause concern, can you imagine trying to record the I.D. of sheep leaving a feedlot in either Australia or overseas country – it would be an animal welfare nightmare.</p>		<p>8. Not accepted. The requirement relates to having a contingency plan in place, not recording individual sheep. The requirement to manage traceability of sheep on a mob basis reflects ESCAS and considers OIE guidance.</p>