Australian Government
Department of Agriculture, Fisheries and Forestry

Exporter Supply Chain Assurance System (ESCAS) Review – stage 2

Report: Recommendations

November 2023

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Acknowledgement of Country

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

Contents

Tables

Overview

The Exporter Supply Chain Assurance System (ESCAS) was introduced in 2011, following the suspension of export of feeder and slaughter cattle to Indonesia due to mistreatment of Australian cattle in some Indonesian abattoirs. ESCAS is a set of regulatory conditions placed on exporters. It requires them to have arrangements in the importing country to ensure humane treatment and handling of livestock from the time the animals arrive up to and including the point of slaughter. Australia is the only country in the world, out of over 100 livestock exporting nations, with such a regulatory system in operation.

The Department of Agriculture, Fisheries and Forestry (department) is progressing a targeted review of ESCAS. This is the first review by the department of ESCAS since the framework was first implemented in 2011. The review will ensure the existing ESCAS framework remains robust, functional and effective in ensuring that animal welfare, control and traceability outcomes continue to be met.

The ESCAS Review considers recommendations from the Inspector-General of Live Animal Exports' (IGLAE) review of ESCAS conducted in 2021 (IGLAE Report). The IGLAE Report recognised that ESCAS has largely achieved its broad objectives and has lifted the standards and practices that Australian livestock are subjected to in importing countries; however, a range of issues were identified. Addressing these issues will ensure Australian livestock are treated in accordance with ESCAS requirements and that ESCAS is operating as effectively and efficiently as possible.

The review is being conducted in a staged manner according to a specific scope (Appendix 1: summary and scoping document) that identifies 5 focus areas for improvement based on outcomes from the IGLAE review that can be summarised as:

1) Monitoring and verification activities – for example, closing the inter-audit gap and ongoing monitoring and verification activities.
2) Control and traceability – for example, developing a control and traceability standard.
3) Noncompliance management – for example, updating the Biosecurity guideline for management of non-compliance to incorporate a proportionate escalating noncompliance framework which considers aggravating and mitigating factors.
4) Administration – for example, streamlining and improving internal administrative processes.
5) The ESCAS Animal Welfare Standards – for example, comparison with the World Organisation for Animal Health (WOAH) Terrestrial Animal Health Code (2022); and updating the Standards where relevant.

Given the targeted nature of this review, the following areas are beyond scope:

- The effectiveness or appropriateness of the legislative basis for ESCAS
- The expansion of ESCAS to breeders
- The development of a detailed quality assurance system

- Cost recovery arrangements.

Approach

The review is being conducted in 3 stages, where each stage includes a component of stakeholder consultation.

These stages are:

- Stage 1: Identify current state challenges
- Stage 2: Develop and test recommendations
- Stage 3: Refresh and produce materials

The review is currently in the second part of stage 2.

Stage 1

Stage 1 involved a critical analysis of documentation to identify challenges with the current state of ESCAS based on the focus areas.

Publicly available information, reports and presentations related to ESCAS were reviewed. This included:

- The IGLAE Report
- World Organisation for Animal Health, Terrestrial Animal Health Code (WOAH Code)
- Current ESCAS legislation, policies and procedures including Export Advisory Notices (EANs)
- ESCAS guidance documentation including audit report templates and auditor guidelines
- The ESCAS Animal Welfare Standards
- The Biosecurity guideline for management of non-compliance
- Correspondence and media from exporters and animal welfare organisations
- Issues that have been identified by the LAE ESCAS team (ESCAS Issues Register)
- ESCAS Compliance Reports
- Research and development project reports relevant to the scope.

These items were reviewed and analysed utilising a root-cause and cross-analysis approach. Where issues were identified through these sources of information, they were further assessed to determine any underlying causes or any connection to other issues, as well as the risk they pose to the ESCAS framework in fulfilling its mandate. For example, the IGLAE Report provided high-level recommendations to issues; however, further analysis of the detail and comparison with other information was conducted. Thus, the root cause (or causes) could be more specifically identified as a challenge and the risk determined.

Challenges identified through this process were documented in a stage 1 discussion paper. The challenges identified components of ESCAS that required further consideration through the review process. These challenges were not failings, nor did their identification confirm conclusively that the

issue is occurring. Rather, they presented either a possible risk to the regulatory framework or a risk to the effectiveness of compliance measures.

Further, the analysis considered documented information on face value and deliberately did not consider whether industry had implemented initiatives (either individually or collectively) to address challenges within ESCAS.

The analysis did not consider historical norms and approaches that had been established over time. Rather, issues were considered from the perspective of someone unfamiliar with ESCAS and how they would interpret the framework based on available documentation.

The stage 1 report did not propose solutions in identifying these challenges but was released to invite constructive feedback from stakeholders. This was in pursuit of an understanding of the quantum of the challenges and potential solutions. The opportunity for stakeholders to qualify, contest or add to the identified challenges was also provided through the stage 1 consultation process.

The consultation process involved releasing the stage 1 report to stakeholders and utilising the survey option on the department's 'Have Your Say' platform.

Stage 2

The first part of stage 2 involved a detailed analysis of stakeholder feedback provided in response to the stage 1 report. This was presented in a stage 2 aggregated report. The report presented the analysis on a challenge-by-challenge basis and outlined considerations made in formulating recommendations to address the challenges. The report also provided a full list of information analysed in forming the challenges.

The second part of stage 2 involved sharing the analysis of feedback with stakeholders and seeking any additional feedback before preparing recommendations. Feedback was provided through one-on-one online meetings with stakeholders who elected to take part.

Current report and consultation

This report provides the draft recommendations to address challenges, with consideration to material analysed and stakeholder feedback. It also outlines the guiding principles that underpin the ESCAS regulatory framework (refer to Guiding principles).

Stakeholders have an opportunity to provide constructive feedback on these recommendations.

For each recommendation, stakeholders are encouraged to indicate whether they agree that the recommendation will address the challenge, disagree if they believe it does not, or provide further solutions in relation to the challenge. Stakeholders may also provide additional considerations for implementing recommendations.

The timeframe for submission of feedback is from 20 November to 18 December 2023. Information provided within this timeframe will be considered in finalising the recommendations.

Stage 3

Stage 3 will commence once feedback on the draft recommendations has been received and considered.

It should be noted that, in implementing the recommendations from this review, there may be further changes required to ESCAS that are not explicitly referenced in the recommendations. This is to ensure consistency and that the framework components function together as a whole.

Any such changes will be defined at stage 3 or during implementation following the review. The department will work with industry and stakeholders to ensure understanding and smooth transition.

Guiding principles

The guiding principles outline the purpose of ESCAS, the roles and responsibilities of parties to ESCAS and the expectations for interaction between parties. These principles were used as the basis for detailed analysis of stakeholder feedback and to formulate the recommendations in this report.

Minor amendments were made to these principles following discussions with stakeholders during consultation.

The purpose of ESCAS

ESCAS is the regulatory framework, underpinned by legislation, administered by the department to ensure feeder and slaughter livestock exported from Australia are handled in accordance with international animal welfare standards from the time of arrival in the importing country up to and including slaughter. In doing so, this gives the community confidence that enables the sustainability of the trade.

To achieve this purpose, the regulatory framework has 4 key components – control, traceability/accountability, animal welfare and independent auditing.

Control

The exporter must have arrangements in place to ensure control of its supply chain from the point of unloading of the vessel up until and including the point of slaughter.

The control process must ensure that all livestock exported by the exporter into the supply chain can be accounted for at all stages and that handling and slaughter practices meet the ESCAS Animal Welfare Standards at all times.

The control process, including movement recording, reconciliation and verification processes, must be transparent and verifiable by the exporter.

Traceability/accountability

The exporter must be able to trace the location of all livestock at all points of the supply chain.

For cattle and buffalo, the exporter must be able to provide reports on the movements along the supply chain of individual animals.

For sheep and goats, in the absence of an Australian domestic requirement for individual animal identification, the exporter must be able to account for all sheep and goats that enter the supply chain.

Effective traceability is dependent on effective control measures through the supply chain.

Animal welfare

The exporter must ensure all handling and slaughter of livestock in the importing country is in accordance with the ESCAS Animal Welfare Standards.

The ESCAS Animal Welfare Standards are based on recommendations provided by the World Organisation for Animal Health (WOAH) in its Terrestrial Animal Health Code (WOAH Code).

Assurance of animal welfare outcomes is dependent on effective control measures through the supply chain.

Utilising the WOAH Code as the basis for ESCAS ensures consistency with Australia's international trade obligations. Therefore, there is minimal risk of Australia breaching the World Trade Organisation's (WTO) Agreement on Technical Barriers to Trade (TBT).

Independent auditing

The exporter must ensure the supply chain is audited by an auditor who is independent, has no conflicts of interest and possesses an appropriate level of competence and expertise (through qualifications, training and experience).

The exporter must be able to demonstrate current accreditation of auditing companies by an appropriate authority such as a member of the international body for accreditation of conformity assessment bodies – the International Accreditation Forum (IAF), with the scope of accreditation being against relevant standards provided by the International Organisation for Standardization (ISO), e.g. be related to compliance auditing and quality management systems such as that provided in ISO/IEC 17021, Conformity assessment — Requirements for bodies providing audit and certification of management systems (ISO 17021).

The role of the department

The role of the department is to regulate the exporter in accordance with Australian legislation.

The department is the independent and impartial regulator of live animal exports. This means that the department develops and reviews regulatory frameworks, consulting widely and duly considering stakeholder views on proposed changes and the impact those changes may have. The department, having taken into account all relevant considerations, has the ultimate decision-making authority and bears responsibility for setting requirements and standards in relation to livestock exports. The department's decisions must be consistent with, and defensible under, relevant legislation.

The department supports trade continuity through ensuring compliance with Australian legislation by regulated entities.

The responsibilities of the department and exporters

Under ESCAS, exporters are responsible for ensuring ongoing, day-to-day compliance with control, traceability and animal welfare requirements within their supply chains. This is achieved by implementing and maintaining systems throughout the supply chain to ensure that animals are accounted for, and that handling and slaughter practices are in accordance with the ESCAS Animal Welfare Standards. These systems should be supported by effective processes for verification and reporting along the supply chain.

The department's responsibility is to set the regulatory requirements and to regulate the exporter in accordance with the regulatory requirements.

The expectations of relationships

The approach to and conduct within interactions is respectful, with the department recognised as the regulator of livestock exports with the roles, responsibilities and authority described above.

The department responds to all reasonable requests from industry regarding decisions made and approaches taken and industry accepts these decisions so long as they are lawful, defensible, transparent and equitable. Concerns may be escalated up the hierarchy, by both departmental staff and industry, as and when necessary.

Recommendations

The draft recommendations have been developed with consideration to material analysed during the desktop review at stage 1 and feedback received during consultation. They relate to specific elements of the ESCAS framework and the associated policies and processes.

These recommendations aim to provide a basis for the materials and framework elements that will be further detailed in stage 3.

To note, many recommendations propose the introduction or amendment of requirements. For livestock exporters using a provider of exporter supply chain assurance operations (ESCAO), some of the recommendations would not directly apply to exporters, as the components would be addressed through the ESCAO provider's approved arrangement. Where relevant, this is indicated under the specific recommendation.

Recommendations have been developed to address a challenge or a group of challenges. For some groups, there are two recommendations. Generally, these grouped challenges fall under the same focus area (Table 1). All the challenges are further detailed in the stage 1 discussion paper and summarised in the stage 2 aggregated report.

Table 1 List of challenges and related recommendations

Focus Area	Challenge	Recommendation
1: Monitoring and verification activities	1.1 Requirements for audit company accreditation and auditor rotation 1.2 Specific standard/s for auditor competency to conduct ESCAS audits 1.3 Interpretation of requirements by auditors	Recommendation 1 Recommendation 2
	1.4 Audit sharing and allocation of noncompliance responsibility 2.10 Attribution of noncompliance	Recommendation 3
	1.5 Sample sizes for audits	Recommendation 4
	1.6 Inter-audit gap 1.7 Use of other surveillance (e.g. audit) methods	Recommendation 5 Recommendation 6
2: Control and traceability	2.1 Overall standard or detailed requirements 2.2 Expectation of 100% compliance 2.3 Use of indicator events 2.4 Critical control points for traceability 2.5 Timely provision of data 2.6 Variability in approaches 2.6.1 Varying systems and sophistication 2.6.2 Varying oversight and verification 2.6.3 Varying data custodianship 2.7 Methods to verity traceability 2.7.1 Use of imagery 2.7.3 Transfer and storage of evidence 2.7.4 Reliance on technology 2.7.5 Availability of traceability data 2.8 Accuracy of traceability data 2.8.1 Accuracy of counting livestock	Recommendation 7

Focus Area	Challenge	Recommendation
	2.8.2 Technology as the 'solution' to accurate sheep and goat counting 2.9 Third-party traceability providers	
	2.7.2 Use of visual recording and fixed radio frequency identification (RFID) scanning	Recommendation 8 Recommendation 9
3: Noncompliance management	2.11 Proportionate noncompliance 3.1 Framework for noncompliance 3.1.1 Noncompliance categorisation 3.1.2 Consideration of noncompliance 3.1.3 Consideration of cumulative noncompliance 3.1.4 Escalation pathway for noncompliance 3.2 Corrective action and timeframes for correction 3.3 Process for managing allegations of noncompliances 3.4 Utilisation of auditors in noncompliance management 3.5 Effective framework for analysing noncompliances 3.7 Consideration of risk factors in risk rating 3.8 Timeframe for compliance information exchange	Recommendation 10 Recommendation 11
	3.6 Incentives for performing higher than a minimum standard	Recommendation 12
4 Administration	4.1 Facility risk ratings – approval date	Recommendation 13
	4.1.1 Naming conventions and premises identification	Recommendation 14
	4.2 Consolidation of ESCAS requirements	Recommendation 15
	4.3 Mechanism for continual improvement in ESCAS	Recommendation 16
	Additional challenge – Arrangements for cultural events inefficient to administer	Recommendation 17
	Additional challenge – Inefficient format and operational procedure for IPARs	Recommendation 18
5: The ESCAS Animal Welfare Standards	5.1 Consistency of ESCAS Animal Welfare Standards with WOAH recommendations 5.1.1 Use of goads 5.1.2 Facility design 5.1.3 Tethering 5.1.4 Protection 5.1.5 Foetus management 5.1.6 Back-up stunning device 5.1.8 Specification of competencies 5.2 Differentiating between signs of unconsciousness and signs of death 5.3 Method for throat cut 5.4 Requirements for landing sites or physical transportation 5.5 Specificity in the Standards 5.6 Consistency of structure and nomenclature of requirements under ESCAS with best practice standards design 5.7 Interpretation of Standard 29 5.8 Requirement to keep records of outcomes of processes	Recommendation 19
	5.1.7 Consolidation of list of unacceptable practices	Recommendation 20
	5.4 Requirements for landing sites or physical transportation	Recommendation 21
	Additional challenge – Recognition of in-market animal welfare standards	Recommendation 22

Focus area 1: Monitoring and verification activities

Six draft recommendations are proposed to address the challenges relating to monitoring and verification activities, as well as 1 challenge relating to attribution of noncompliance. These challenges are detailed in the stage 1 discussion paper.

Recommendation 1

Introduce mechanisms to verify and manage auditor quality and performance through the following:

1) Require exporters to demonstrate audit companies hold accreditation to, or equivalency with, ISO/IEC 17065:2012 (Conformity assessment — Requirements for bodies certifying products, processes and services) and meet other requirements as set out in this recommendation and Recommendation 2. Accreditation must be bestowed by a member of the International Accreditation Forum (IAF) or equivalent.
2) Establish competency requirements (skills and experience) for auditors.
3) Establish conflict of interest requirements for auditing companies and auditors.
4) Develop clear requirements for audit companies and auditors in relation to the audit process, reporting and noncompliance management.
5) Introduce the requirement for exporters to ensure audit companies rotate auditors after every 4 audits of the same facility. The number of audits includes those undertaken for Initial Independent Audit Reports (IIARs) and those undertaken for Independent Performance Audit Reports (IPARs).
6) Investigate the feasibility of implementing a system within the department to capture audit outcomes for specific facilities that can be used to manage auditor quality and performance. This would allow patterns of noncompliance assignment by auditors to be identified and analysed as well as noncompliance identified by other means. This would require exporters to upload audit reports in electronic formats that can be imported into such a system.
7) Enable the ability for the department to prohibit exporters accepting audit reports from certain audit companies.

In formulating auditor requirements, consideration should be given to the Livestock Global Assurance Program (LGAP) Certification Rules administered by the provider AniMark (2023). Specifically, the LGAP Certification Rules contain requirements for auditor competency, reporting and noncompliance management that may be used to inform development of similar requirements.

Exporters using an ESCAO provider (i.e. third-party provider of assurance services or TPPAS) under section 6-35(5) of the Export Control (Animals) Rules 2021 would not be required to undertake this component, as the ESCAO provider would be responsible for verifying, monitoring and managing auditor quality and performance.

Challenges

1.1 Requirements for audit company accreditation and auditor rotation

1.2 Specific standard/s for auditor competency to conduct ESCAS audits

1.3 Interpretation of requirements by auditors

Recommendation 2

To ensure consistent assessment of the ESCAS requirements, additional requirements should be introduced in relation to exporters ensuring that:

1) Auditors undertake on-going calibration training
2) such training occurs on a regular basis including
    a) when updates to ESCAS occur
    b) when clarification regarding requirements is communicated by the department to exporters
    c) if auditor monitoring indicates such training is required
3) documented information to demonstrate auditors have undertaken such training can be provided upon request of the department.

Exporters using an ESCAO provider would not be required to undertake this component, as the ESCAO provider would be responsible for managing auditor training.

Challenges

1.1 Requirements for audit company accreditation and auditor rotation

1.2 Specific standard/s for auditor competency to conduct ESCAS audits

1.3 Interpretation of requirements by auditors

Recommendation 3

Introduce the requirement that, where audits are shared between facilities by exporters, those exporters take equal responsibility for any issues of noncompliance identified through any means. This would include sharing equally the allocation of the severity of the noncompliance, the corrective action and the regulatory action taken, with the following exceptions:

1) Where an exporter can provide evidence to demonstrate, to the satisfaction of the department, that the issue clearly did not involve livestock from any of their consignments and this evidence is based on:
    a) The use of individual animal identification or
    b) the exporter has not consigned livestock to that facility within a relevant period based on facility operations and audit schedule.
2) Where the department is satisfied that there is evidence to demonstrate that the severity of noncompliance may be different for different exporters.

This requirement may not apply to exporters using an ESCAO provider, where the ESCAO provider holds responsibility for facility audits and subsequent noncompliance management.

Challenges

1.4 Audit sharing and allocation of noncompliance responsibility

2.10 Attribution of noncompliance

Recommendation 4

Introduce sample sizes for all forms of audit at key points of risk, specifically:

1) animal handling when loading or unloading from land transport vehicles at any point in the supply chain
2) animal handling when moving livestock from lairage into restraint in abattoirs
3) during the stunning process
4) monitoring unconsciousness between stunning and death.

Sample sizes for the number of animals to be observed during audits should be established based on the following considerations:

- The sample size should be based on the average daily total number of animals received or processed at that facility.
- Consideration should be given to sample sizes that can be achieved within a specified timeframe (for example one hour out of a 4-hour audit period).
- For facilities that load, unload or process less than 10 head on average per day, the minimum number of animals to be observed should be 3. An uneven number is recommended to enable repeatable compliance to be observed.
- IIAR audits should allow non-Australian livestock to be included in sample sizes, provided they are of a similar size and class to that expected to be received from Australia.

Challenge

1.5 Sample sizes for audits

Recommendation 5

Introduce the tools referenced by industry in feedback provided during the review as requirements under ESCAS to manage the 'inter-audit gap', including:

1) Maintaining records that demonstrate compliance with requirements.
2) Undertaking internal audits on a frequency based on the facility's ESCAS risk rating and that the ESCAS risk rating include a frequency for internal and external audits for the different risk categories.
3) Ensuring the facility can demonstrate that staff are trained and competent in implementing the ESCAS requirements.
4) Monitoring to ensure that ESCAS requirements are being met on a day-to-day basis.

Challenges

1.6 Inter-audit gap

1.7 Use of other surveillance (e.g. audit) methods

Recommendation 6

Allow the use of other audit methods under ESCAS to increase flexibility in the verification of compliance. Such methods may be applied for IIAR, IPAR, department-initiated audits etc. and include:

1) Audits that have a limited scope, for example, auditing only the traceability requirements or the slaughter requirements rather than all requirements.
2) Desktop audits that focus on aspects of the ESCAS requirements that do not rely on on-site observation, for example, record keeping.
3) Targeted audits of specific facilities or supply chains when there are indications of noncompliance.
4) Audits of exporter arrangements through the supply chain, in particular control and traceability arrangements, for example, random data inspections.
5) Unscheduled announced audits with an announcement period of not more than 24 hours for facilities.
6) Random, unannounced audits of an exporter's ESCAS arrangements, including arrangements within a facility or across a supply chain. These may be on-site at the exporter's premises in Australia or undertaken as a desktop audit.

Challenges

1.6 Inter-audit gap

1.7 Use of other surveillance (e.g. audit) methods

Focus area 2: Control and traceability

Three draft recommendations are proposed to address the challenges relating to control and traceability (C&T). This involves the introduction of specific outcomes-based requirements that would form a new C&T Standard for ESCAS. The challenges are detailed in the stage 1 discussion paper.

Recommendation 7

Introduce specific outcomes-based requirements for C&T that consider the system itself and the use of the system. Such requirements should not specify technology nor discriminate against systems due to size, scale, sophistication or technology but rather include provisions for:

1) The system to enable:
    a) confirmation of an animal's or group of animals' presence at a particular facility
    b) the accurate tracing of an animal's or group of animals' movements from and to a facility within a specified timeframe
    c) an exporter to be accurately connected to an animal or group of animals in a facility

d) accurate identification of facilities where animals will be held, the means of identifying an animal or group of animals used and the means of connecting this information to the exporter

e) confirmation of the location, movement and welfare outcome of all animals in the supply chain as well as the ability to reliably and accurately connect these factors to an individual exporter.

2) Establishing processes for use of the system, including:

a) identifying, installing, using and maintaining the type of infrastructure and equipment that is required by the traceability system

b) the use, removal, replacement, reuse, destruction and storage of identifiers as well as records to demonstrate these events

c) determining methods and formats for secure capture and transfer of traceability data

d) checking animals or groups of animals are identified and actions to be taken if they are not

e) verifying the validity, reliability and accuracy of traceability data

f) maintaining evidence of processes being followed and compliance

g) use of visual imagery or video footage when relied upon as evidence of compliance including considerations for:

i) minimum display resolutions that enable clear viewing of detail

ii) framing, focusing and lighting such that animals can be clearly seen and identified

iii) use of GPS or unique reference point location, date and time referencing

iv) linkage between animal or groups of animals, the location and the exporter

v) review of such imagery or footage

vi) recognition of in-market legislation related to such imagery or footage

h) reconciling traceability data including evidence of compliance.

3) Minimum movement data required to be maintained as well as timeframes for when such data should be provided to the exporter. Specifications for timeframes may consider those utilised under the National Traceability Performance Standards (AHA 2012) and the LGAP Standards (AniMark 2023).

4) The monitoring of the occurrence of incidents such as:

a) lost or replaced identifiers

b) livestock that move out of a supply chain as breeding stock

c) livestock losses or mortalities

d) loss of traceability

e) incorrect assignment of location to animals

f) number of livestock sent to a facility exceeds that facility's capacity

g) reconciliation of traceability data that does not result in 100% of animals being accounted for

h) anomalies in traceability data or evidence of compliance that occur more than once in relation to the same animal or group of animals, the same facility or the same type of anomaly within a supply chain.

5) Actions to be taken to review anomalies or incidents, identify the cause of such and remedy causes.

6) Competencies required for human resources responsible for traceability.

7) Ensuring conflicts of interest are avoided by suppliers of traceability systems and auditors.

8) Auditing arrangements for ensuring internal (facility) traceability is compliant and external (across the supply chain) traceability is compliant. This may include:

   a) requirements at a facility level for traceability, including auditor guidance for auditing traceability when on-site at a facility and having access to all required traceability-related information at the time of audit

   b) requirements across a supply chain for traceability, including auditor guidance for auditing traceability across the supply chain, originating at the exporter and having access to all required traceability information at the time of audit

   c) auditing schedule for traceability audits, including a frequency for both facility and supply chain audits based on risk.

9) A mechanism for recognition of any country-specific traceability system that would deliver the assurances being sought under ESCAS.

In formulating requirements in relation to these provisions, consideration should be given to:

- Requirements for approval of devices used under the National Livestock Identification System or NLIS (ISC 2023)
- AniMark requirements related to control and traceability and third-party traceability systems used by operators and facilities found in the LGAP Standards (AniMark 2023)
- Meat & Livestock Australia (MLA) and LiveCorp publication on control and traceability arrangements to support LGAP (AniMark 2021), which provides insights into the types of controls utilised in-market.

Challenges

2.1 Overall standard or detailed requirements

2.2 Expectation of 100% compliance

2.3 Use of indicator events

2.4 Critical control points for traceability

2.5 Timely provision of data

2.6 Variability in approaches

2.6.1 Varying systems and sophistication

2.6.2 Varying oversight and verification

2.6.3 Varying data custodianship

2.7 Methods to verity traceability

2.7.1 Use of imagery

2.7.3 Transfer and storage of evidence

2.7.4 Reliance on technology

2.7.5 Availability of traceability data

2.8 Accuracy of traceability data

2.8.1 Accuracy of counting livestock

2.8.2 Technology as the 'solution' to accurate sheep and goat counting

2.9 Third-party traceability providers

Recommendation 8

Introduce requirements that:

1) Exporters may use compliance monitoring tools such as visual recording (e.g. CCTV technology); however, specific technologies should not be generally prescribed.
2) The department may require:
    a) the use of compliance monitoring tools, such as visual recording based on an assessment of risk, and that use may be specific to a facility, a supply chain or a market
    b) the submission of visual recordings at audit or to assist with investigations to verify that exporter compliance monitoring methods are functional or where there is a systemic loss of control and traceability.

In making this recommendation it is noted that:

- Exporters remain responsible for implementing animal welfare and control and traceability procedures that are effective in demonstrating compliance.
- The department's role as the regulator should be focused on the verification rather than monitoring of compliance, therefore visual recording is not suitable for the department to use as a regulatory tool, independent from other mechanisms.

Challenge

2.7.2 Use of visual recording and fixed radio frequency identification (RFID) scanning

Recommendation 9

Introduce the requirement for the use of individual electronic identification (e.g. RFID) for sheep and goats. This is recommended on the basis that it has been mandated in Australia and is expected to be implemented for all farmed sheep and goats born after 1 January 2025 and all farmed sheep and goats that leave the property by 2027.

In specifying this, the following should be considered:

- A phased approach may be required to address the time between when changes to ESCAS from this review are implemented until 1 January 2027.

- During such a phased approach, the use of individual electronic identification for sheep and goats may be required by the department, for example, where a systemic loss of control and traceability is identified.

Challenge

2.7.2 Use of visual recording and fixed radio frequency identification (RFID) scanning

Additional considerations

It is not recommended that limits be placed on the number of available supply chains, as proposed in an additional challenge identified through the consultation process. Such a limit may be considered trade restrictive. The recommended changes to the risk assessment of facilities are likely to alleviate the concerns that underpin this suggestion.

Additional challenge

Continuous expansion and approval of different supply chains compounds risk, limits on supply chains per market may resolve

Focus area 3: Noncompliance management

Three draft recommendations are proposed to address the challenges relating to noncompliance management, as well as one challenge relating to proportionate noncompliance. These challenges are detailed in the stage 1 discussion paper.

Recommendation 10

The Biosecurity guideline for the management of non-compliance be replaced with an ESCAS noncompliance framework that considers the following:

1) Categories of noncompliance should be defined as minor, major and critical and the distinction between them made clear.
2) A matrix for categorising noncompliance should be developed, with determining factors being impact and occurrence. In addition, mitigating or aggravating factors should be considered in the categorisation of noncompliance.
3) Processes for assigning noncompliances by auditors and the department should be specified, as well as:
    a) timeframes for reporting and closing out noncompliances, including consideration of varying timeframes based on categorisation of noncompliance, how the noncompliance was identified and whether a corrective action plan may be utilised (in cases where immediate corrective action may not be possible)
    b) what is expected of corrective action
    c) examples of evidence required to demonstrate correction
    d) in what situations corrective action would be assessed by auditors and the department
    e) who would close out noncompliances.

4) The assigning of a category of noncompliance should be based on the principles of continual improvement and procedural fairness. In particular:

    a) Noncompliances should be assigned against specific requirements where it has been identified that a requirement has not been fulfilled, rather than assigned against a principle or where it has not yet been determined that the noncompliance occurred.

    b) Corrective action should eliminate the root-cause of the noncompliance in order to prevent reoccurrence. The reoccurrence of a noncompliance (for which corrective action was undertaken) indicates that such action was not sufficient, triggering a higher level of noncompliance for repeat occurrence.

    c) Depending on the category of noncompliance, facilities should not necessarily be prohibited from operating while the noncompliance is being corrected.

    d) Corrective action should be assessed and the noncompliance closed out if evidence indicates the corrective action was effective in addressing the root cause of the noncompliance so as to prevent reoccurrence.

5) A list of example noncompliances, as well as instructions for determining and assigning noncompliance, should be developed and maintained. The development of these items should be based on:

    a) unacceptable practices identified under the WOAH Code (2023) and analysis of the department's ESCAS regulatory performance reports

    b) similar information as outlined in Annex D of the LGAP Certification Rules on nonconformities, impacts and number of instances (AniMark 2023).

6) A means of escalating noncompliances that are not closed out in a specified timeframe, or reoccur after corrective action has been taken, should be established.

7) The process for suspending facilities should be specified, including the ability to suspend a line within a facility if the exporter is able to demonstrate:

    a) separation of livestock based on arrangements related to time, space, personnel or infrastructure

    b) the root-cause of the noncompliance will not impact remaining lines.

8) The manner in which a noncompliance may be identified is clearly defined (e.g. self-reporting, third-party reporting, audit). There should be varied approaches to the management and public reporting of the noncompliance based on how it is identified and the severity of the noncompliance. It is noted this will require consideration of public interest in the reporting of noncompliances. For noncompliances identified by an exporter (i.e. self-reporting) or through an audit, a varied approach would only apply when:

    a) reports of such noncompliances are made to the department within a specified timeframe of the exporter becoming aware of the noncompliance

    b) the exporter can demonstrate that corrective action was undertaken when the noncompliance was identified by the facilities, or such action was underway at the time the exporter became aware of the noncompliance

c) for noncompliances identified by an exporter, an IIAR or IPAR audit has not occurred at that facility within the 3 months prior to the noncompliance occurring

d) the facility is not operating under an exporter using an ESCAO provider, as approaches to noncompliance would be managed under that framework.

9) Risk ratings should be determined on an assessment of a broader range of risks and control measures that focuses on risks that may impact the ability to remain in compliance with ESCAS on a day-to-day basis, both within a facility and across a supply chain. In establishing this assessment, consideration should be given to the risk assessment framework developed under LGAP as identified in the MLA/LiveCorp reports W.LIV.3014 (Schuster 2014) and W.LIV.3027 (Schuster 2016), as well as analysis of the ESCAS regulatory performance reports. In particular:

   a) This would require the identification of:

      i) the nature and types of risk events or cause of risk

      ii) the control measure(s) required to minimise or eliminate the risk

      iii) a score for each control measure and the range for each risk rating (e.g. high, medium, low).

   b) Based on published information considered in this review, risks and controls that may be considered in the development of such a risk assessment include those that relate to:

      i) traceability (movement), i.e. reporting and reconciliation, movement through the supply chain, accounting for animals on entry/exit

      ii) traceability (identification), i.e. appropriate identification methods used, appropriate use of identification.

      iii) traceability (technology), i.e. use of technology to support traceability (e.g. visual monitoring)

      iv) traceability (personnel), i.e. allocation of human resources responsible for traceability

      v) traceability (data and reporting), i.e. method of collecting captured animal movement data, method of storing traceability data, method of transmitting the data collected to the register and timeframe of data transmission

      vi) monitoring of the facility, i.e. measures in place (e.g. technology, people and procedures) to identify and address noncompliances on a day-to-day basis

      vii) operations, i.e. sharing of facilities between ESCAS supply chains and between ESCAS and non-ESCAS supply chains, supply chain structure, frequency of operation, site access, security, capacity and market

      viii) slaughter processes, i.e. restraint method used, use of stunning, slaughter method used, use of slaughter teams

      ix) past performance, i.e. consideration of the facilities performance during past audits.

10) The full range of powers available to the department under the Export Control Act 2020, which may include:

   a) variation of an approved ESCAS

   b) show cause notices

c) infringement notices

d) application of conditions to a licence

e) enforceable undertakings

f) injunctions

g) revocation of an approved ESCAS

h) suspension of a licence

i) cancellation of a licence.

11) Application of broader regulatory action, for example requiring:

a) greater oversight of a facility that has been allocated a noncompliance and where corrective action is required or currently being undertaken while Australian animals are onsite

b) the use of visual recording and submission of recordings (refer Recommendation 8)

c) the use of individual electronic identification (e.g. RFID) for sheep and goats (refer Recommendation 9).

12) The approach taken to investigate allegations of noncompliance including:

a) timeframes in which responses to allegations are to be provided to the department by exporters

b) any regulatory action that may be applied to mitigate the risk of further noncompliance while an allegation is being investigated.

13) Provisions for noncompliance management arrangements where an exporter uses an ESCAO provider.

In developing categories of noncompliance, a categorisation matrix and an approach to investigating allegations, consideration may be given to the LGAP Certification Rules (AniMark 2023). LGAP includes a noncompliance matrix which considers the impact on welfare, traceability and management systems along with the occurrence of noncompliance (e.g. infrequent, numerous or systemic). It also includes a complaints management process for allegations of noncompliance.

Exporters using an ESCAO provider would be subject to alternative arrangements than that in the ESCAS noncompliance framework. The ESCAO provider would administer a system for dealing with non-conformities to its program and would oversee corrective actions. The department would not apply compliance measures under the ESCAS noncompliance framework where corrective action is applied and the noncompliance successfully closed out under the ESCAO assurance rules.

Challenges

2.11 Proportionate noncompliance

3.1 Framework for noncompliance

3.1.1 Noncompliance categorisation

3.1.2 Consideration of noncompliance

3.1.3 Consideration of cumulative noncompliance

3.1.4 Escalation pathway for noncompliance

3.2 Corrective action and timeframes for correction

3.3 Process for managing allegations of noncompliances

3.4 Utilisation of auditors in noncompliance management

3.5 Effective framework for analysing noncompliances

3.7 Consideration of risk factors in risk rating

3.8 Timeframe for compliance information exchange

Recommendation 11

In order for the recommended approach to categorisation of noncompliance and compliance monitoring and verification to be effectively implemented:

1) An exporter will be required to maintain a system that, for each facility in their supply chain:
    a) records noncompliances identified through audits and self-reports
    b) records corrective action undertaken and its effectiveness in closing out the noncompliance
    c) monitors the occurrence of noncompliances for each facility in its supply chain against specific requirements
    d) enables trends to be identified in compliance history across facilities, supply chains and markets
    e) ensures auditors are aware of the history of noncompliance in the facilities they are auditing.
2) The department will require an internal system to record historical noncompliance data as well as outcomes of exporter reports and third-party reports. Such a system can then be used to:
    a) identify the occurrence of noncompliances
    b) analyse the effectiveness of compliance measures and the regulatory framework and identify areas of improvement for exporters and ESCAS
    c) provide the basis for decisions relating to supply chain variation approvals and compliance measures
    d) verify auditor quality and performance (refer Recommendation 1).

Depending on the department's internal system, exporters may need to ensure their system can be used to provide audit reports in an electronic format so that it can be imported into the department's system.

Exporters using an ESCAO provider would not be required to undertake this component as the ESCAO provider would be responsible for recording and monitoring such information and reporting to the department on a quarterly basis or upon request by the department.

Challenges

2.11 Proportionate noncompliance

3.1 Framework for noncompliance

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3.1.4 Escalation pathway for noncompliance

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3.5 Effective framework for analysing noncompliances

3.7 Consideration of risk factors in risk rating

3.8 Timeframe for compliance information exchange

Recommendation 12

It is appropriate for ESCAS to continue be aligned to and therefore consistent with the WOAH Code. It is, however, recognised that the WOAH Code is considered by many to be a minimum standard.

To encourage improvement above the WOAH Code, mechanisms such as the risk assessment (refer Recommendation 10) would provide an opportunity for exporters to be recognised for performing above such a standard.

To enable such recognition to occur under ESCAS, the existing audit frequency may be revised based on the recommended risk assessment and consideration given to increasing compliance measures and monitoring requirements for medium and high-risk facilities

Challenge

3.6 Incentives for performing higher than a minimum standard

Focus area 4: Administration

Four draft recommendations are proposed to address the challenges relating to administration. These challenges are detailed in the stage 1 discussion paper.

Recommendation 13:

In developing a revised risk assessment methodology under Recommendation 10, consider the inclusion of a risk factor that accounts for the risk to compliance due to the consecutive length of time a facility has been in any one approved supply chain or combination of supply chains. Such an approach would be supported by the compliance verification system outlined in Recommendation 1.

Challenge

4.1 Facility risk ratings – approval date

Recommendation 14

Introduce a mechanism for individually identifying facilities such that:

1) Each facility is allocated an individual identifier.
2) Each facility's individual identification is recorded in the compliance verification system (refer Recommendation 10) in a way that accounts for discrepancies in information provided for different supply chains.

In establishing a method of identifying each facility, the department should draw on the 'Naming Convention for ESCAS Facilities in Indonesia' submitted by AniMark and give consideration to recognising naming conventions for facilities operating under exporters using an ESCAO provider.

Challenge

4.1.1 Naming conventions and premises identification

Recommendation 15

In implementing changes recommended under this review, all information should be consolidated into a limited series of specific documents. EANs should be used for advisory purposes or short-term requirements rather than to contain ongoing regulatory requirements. The consolidated documents should relate to:

1) ESCAS requirements for animal welfare, control and traceability (the 'ESCAS Standard'), including:
    a) outcomes-based requirements as well as targets and measures
    b) guidance on demonstrating compliance.
2) Materials for auditors, including:
    a) auditor guidance for auditing under ESCAS; this should consider the AMI Foundation's animal handling guidelines and audit guide (Grandin 2017)
    b) audit checklist templates
    c) audit report templates.
3) The operation, administration and expectations of ESCAS, that specifies:
    a) roles, responsibilities and obligations of all parties under ESCAS
    b) processes for applying for an ESCAS or varying an ESCAS
    c) auditing under ESCAS (IIAR, IPAR and other)
    d) assessment of risk and assigning a risk rating
    e) noncompliance identification and management, including:
        i) identifying noncompliance (e.g. audits, self-reports, third-party reports)
        ii) reporting allegations of noncompliance, including guidance on how to report and what needs to be reported for the allegation to be investigated
        iii) categories of noncompliance and how they are assigned

iv) managing, correcting and closing out noncompliance for noncompliance identified during an audit, self-reporting of noncompliances and third-party investigations leading to the assignment of a noncompliance.

f) public reporting of noncompliance in a manner that is objective, factual, consistent and considers public interest and ESCAO arrangements.

Challenge

4.2 Consolidation of ESCAS requirements

Recommendation 16

ESCAS should be subject to regular review. This should:

1) Be based on a minimum review cycle of 5 years or whenever the WOAH Code is updated, whichever is earlier. A partial review of ESCAS may occur over two 2.5-year cycles such that the entire framework is updated within the 5-year period. Such an approach would not preclude ESCAS being reviewed and updated more frequently as required.
2) Include a process for seeking feedback from interested stakeholders in a structured manner. Such stakeholders should include regulated entities, animal welfare organisations, industry bodies and research and development bodies.
3) Include consideration and communication to regulated entities of expectations for transitioning to any new requirements, including the time required to transition and processes to demonstrate compliance with new requirements.

Challenge

4.3 Mechanism for continual improvement in ESCAS

Recommendation 17

Include requirements under ESCAS that address arrangements for cultural events such as Eid al-Adha (also known as Korban) that would:

1) be mandatory to those exporters that intend to export in the lead up to or during a cultural event
2) come into effect and remain in effect within a timeframe specified in the requirements
3) necessitate at least one audit to occur during the event.
4) be based on conditions that have been applied under ESCAS to date.

Additional challenge

Arrangements for cultural events inefficient to administer

Recommendation 18

In reviewing materials under ESCAS, consideration should be given to improving the format of IPARs and associated operational procedures, noting that many of the changes proposed through these recommendations should address this challenge.

Additional challenge

Inefficient format and operational procedure for IPARs

Additional considerations

In considering ESCAS approval processes, facility approvals must continue to be managed on a supply chain basis. An ESCAS is granted for an individual exporter; however, exporters may coordinate physical facility audits for the purposes of applications to the department.

Exporters using an ESCAO provider may experience greater efficiencies and improved timeliness for new facility approvals.

Additional challenge

Timeliness for gaining approval for a new facility to be included in an ESCAS when it is already approved in another exporter's ESCAS

Focus area 5: ESCAS Animal Welfare Standards

Four draft recommendations are proposed to address the challenges relating to the ESCAS Animal Welfare Standards. These challenges are detailed in the stage 1 discussion paper.

Recommendation 19:

To ensure consistency with Australia's international trade obligations, ESCAS animal welfare requirements are based around internationally agreed standards (as opposed to Australian standards). It is appropriate for ESCAS to continue to be aligned to and therefore consistent with the WOAH Code.

To ensure such consistency, the ESCAS Animal Welfare Standards should be updated to include:

1) clarity around the use of electric goads
2) provisions for facility design including requirements for passageways, races and ventilation
3) a provision in relation to the use of bedding for animals in lairages
4) provisions that address tethering in so far as ensuring an animal is able to stand-up, sit-down and lie down if restrained and that such restraint should only be applied for a minimal amount of time
5) provisions for ensuring animals are protected from predation
6) requirements related to appropriate management of foetuses if they are identified during the slaughter process
7) requirements for the type and use of a back-up stunning device; this should include the requirement for a back-up stunning procedure in the event both the primary and back-up devices fail
8) provisions for competency requirements
9) better definition of the signs of unconsciousness or insensibility and the signs of death

10) clarity around methods of throat cutting
11) greater specificity in relation to the WOAH Code requirements to ensure personnel do not need to reference multiple documents to understand all ESCAS requirements
12) clear delineation between a requirement, evidence of compliance and auditor guidance and reduced ambiguity; this can be achieved by following best practice for standards writing and should include consideration of wording used in previous iterations of ESCAS requirements
13) clearer requirements in relation to facilities identifying and monitoring compliance at critical control points and verifying compliance is maintained on a day-to-day basis.

When updating the ESCAS Animal Welfare Standards and guidelines for auditing, the primary reference should be the WOAH Code. In addition, consideration should be given to:

- the United Kingdom's (UK) AssureWel project (SA, RSPCA & UB 2023)
- the AMI Foundation's animal handling guidelines and audit guide (Grandin 2017)
- Clarifying documentation provided by the department to exporters or industry bodies (e.g. on the signs of unconsciousness or insensibility).

Challenges

5.1 Consistency of ESCAS Animal Welfare Standards with WOAH recommendations

5.1.1 Use of goads

5.1.2 Facility design

5.1.3 Tethering

5.1.4 Protection

5.1.5 Foetus management

5.1.6 Back-up stunning device

5.1.8 Specification of competencies

5.2 Differentiating between signs of unconsciousness and signs of death

5.3 Method for throat cut

5.4 Requirements for landing sites or physical transportation

5.5 Specificity in the Standards

5.6 Consistency of structure and nomenclature of requirements under ESCAS with best practice standards design

5.7 Interpretation of Standard 29

5.8 Requirement to keep records of outcomes of processes

Recommendation 20

When updating the ESCAS Animal Welfare Standards, unacceptable practices should be consolidated into a single list and referenced at appropriate points in the revised standard.

Challenge:

5.1.7 Consolidation of list of unacceptable practices

Recommendation 21

When updating the ESCAS Animal Welfare Standards, the processes identified by industry (as those currently in place to ensure ESCAS requirements are met) should be formalised and recognised under the standard. Processes identified include the use of competent personnel overseeing this point of the supply chain (identified by industry comments as animal welfare officers and Australian Accredited Stockpersons). In formalising such processes, consideration should be given to how this will be audited and how responsibility for noncompliance is attributed to the appropriate party where such facilities are shared (refer Recommendation 3 and Recommendation 10).

Challenge

5.4 Requirements for landing sites or physical transportation

Recommendation 22

It is currently possible under ESCAS for importing country animal welfare standards to be assessed for equivalency against ESCAS. Where such an assessment demonstrates that the market would be considered low risk, alternative audit schedules may be applied on a case-by-case basis.

This arrangement was previously articulated in EANs 2013-05 and 2013-06, noting these have been withdrawn from publication although the policy remains.

The arrangements to enable recognition of in-market animal welfare standards as equivalent to ESCAS should be clearly articulated, to allow for that market's risk level to be assessed. This should include consideration of:

1) the assessment methodology, criteria for levels of risk (e.g. low, medium and high) and evidence required to demonstrate equivalency and risk level
2) exporters being the party responsible for undertaking the assessment
3) processes for exporters to apply for alternative audit schedules based on the outcome of the assessment
4) alternative audit schedules and requirements for ongoing monitoring and verification by exporters to ensure ongoing compliance with ESCAS and eliminate any changes to risk or equivalency standing
5) the ability for the department to rescind the equivalency standing or vary the audit schedule where necessary.

Additional challenge

Recognition of in-market animal welfare standards

Appendix 1: summary and scoping document

1.1 Purpose

To review specific elements of the ESCAS framework, policies and processes to ensure ESCAS continues to be fit for purpose; to integrate improvements identified throughout its implementation; and to include, where appropriate, findings of reviews, including by the Inspector-General of Live Animal Exports (IGLAE). The review will also identify and address gaps and consolidate ESCAS policy. The outcome of the review will support consistent risk-based and proportionate regulation and provide a single documented source of truth for stakeholders and departmental staff.

1.2 Scope

The scope of the review includes specific elements of the framework, guidelines, policies, instructional material, independent auditing, and the department's assurance activities in relation to ESCAS. The Biosecurity guideline for management of non-compliance will also be reviewed. The key focus of the review is:

- Closing the inter-audit gap (ongoing monitoring and verification activities)
- Developing a control and traceability standard
- Updating of the Biosecurity guideline for management of non-compliance to incorporate a proportionate escalating non-compliance framework which considers aggravating and mitigating factors
- Streamlining and improving internal administrative processes
- Addressing the recommendations from the IGLAE review of ESCAS conducted in 2021.

1.3 Out of scope

The review will not consider expansion of ESCAS to breeders. The review will not consider the effectiveness or appropriateness of the legislative basis for ESCAS; however, opportunities for improvements to the Export Control (Animals) Rules 2021 may be identified for consideration following the review. The review will not develop a detailed quality assurance system. It will be up to exporters to ensure their ESCAS arrangements continue to meet the standards.

1.4 Related projects

Outcomes of the ESCAS review will feed into the performance and compliance project.

1.5 Process

Current state and challenge identification

The current state of ESCAS with areas for improvement and issues for resolution will be identified through a review of:

1) Data – including number of exporters with approved ESCAS supply chains, markets and volume of livestock that move through the system
2) Current legislation, policies and procedures in the framework, including Export Advisory Notices (EANs) relevant to ESCAS
3) Recommendations from the IGLAE report into ESCAS (which included views from stakeholders)
4) Outcomes of ESCAS investigations
5) Correspondence and media from exporters and animal welfare organisations in relation to ESCAS
6) Issues that have been identified and noted for consideration by the LAE ESCAS team
7) Comparison with WOAH standards

Engagement at stage 1 will encompass a wide range of stakeholders. It will include exporters with an existing approved ESCAS supply chain, ALEC, MLA, LiveCorp, Cattle Council of Australia, Sheep Producers Australia, the Australian Buffalo Industry Council, the Goat Industry Council of Australia, Exporter Supply Chain Assurance Operations (ESCAO) providers with an approved arrangement, and animal welfare organisations. These stakeholders will be invited to provide feedback and comment on matters they would like considered as part of the review that fall within the determined scope. Feedback will be received through the department's 'Have Your Say' platform. A stage 1 engagement plan will define the scope of engagement and articulate how the broad group of stakeholders can provide relevant, specific and actionable feedback.

Develop recommendations

Following stage 1, recommendations will be developed to revise relevant parts of the ESCAS framework. A refreshed model will be proposed for approval.

The recommendations will clearly articulate options for addressing the issues identified in the review and justification for recommending options.

Engagement at stage 2 will test the recommendations on a targeted range of stakeholders and may include the use of workshops and interviews. Not all groups will be engaged in the same way on all issues. In this stage of engagement, comment and feedback on the technical components will be invited and considered in finalising the revised ESCAS framework.

Refresh and production of new materials

Following approval of any proposed revisions to the ESCAS framework, guidelines, policies, procedures and instructions will be refreshed to ensure that the documents clearly articulate the reviewed arrangements.

Engagement at stage 3 will include public consultation with relevant stakeholders and engagement with exporters and industry groups on the readability and design of materials for industry.

Any changes arising from the review will be rolled out in 2023 (date or tranche dates to be determined). We will focus on change management and provide industry and the department with a preparation period prior to implementation.

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