



Exported Supply Chain Assurance system (ESCAS) review – stage 1 discussion paper

Submission of the
Australian Veterinary Association Ltd

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The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

There is an AVA Australian Government Accredited Veterinarians (AAVs) subcommittee which was formed to create a mechanism for this group of veterinary professionals to have a voice in their industry; the subcommittee has been consulted in preparation of this submission.

While the Export Supply Chain Assurance System (ESCAS) does not directly engage AAVs, their services are often engaged by exporters and importers to assist with animal health and welfare in importing markets both under ESCAS and breeder export programs. Wherever possible the Department of Agriculture, Fisheries and Forestry (DAFF) should engage the expertise and experience of AAVs.

The positive animal welfare improvements achieved under ESCAS are acknowledged by the AVA. The AVA is supportive of Animark's Livestock Global Assurance Program (LGAP) as a Quality Assurance System to meet the objectives of ESCAS in the future. Many of the challenges outlined in the review may be resolved by the implementation of LGAP.

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The AVA thanks DAFF for the opportunity to provide comment on Stage 1 of this process. We acknowledge the desktop review of ESCAS has identified a large range of challenges, and you are seeking feedback from those with firsthand experience to determine the scope of review. This submission is informed by AVA policy. We believe the challenges commented on below must be included in the scope of work to provide the community with evidence that animal welfare is prioritised in livestock export.

2. Monitoring and verification activities

The AVA is of the opinion that the independent audits undertaken must be conducted to detect any failures of ESCAS. There is an expectation that

- Monitoring and verification requirements are clearly detailed to reduce the risk of ambiguity in interpretation of requirements.
- Auditors are able to demonstrate appropriate level of competence to a level of that required for in-market auditing.
- Administrative burden associated with these activities will be monitored and refined where possible.

Having confidence in robustness of monitoring and verification activities and its ability to identify noncompliance creates trust in ESCAS which contributes to social acceptance of livestock export.



3. Noncompliance management

The AVA is of the opinion determination of noncompliance and where in the supply chain the responsibility sits if detected must be clearly articulated and understood by all participants in the live export animal industry. Clear processes of consequences for noncompliance must be available to all stakeholders.

5. ESCAS animal welfare standards

Effective operational protocols must be in place at all times to safeguard the welfare of exported animals. These protocols must ensure humane animal transport, low stress handling and slaughter practices in accordance with best practice.

The ESCAS animal welfare standards must clearly incorporate all of the World Organisation for Animal Health (WOAH) recommendations pertinent to ESCAS. To minimise the risk of misinterpretation and subsequent inappropriate implementation, the ESCAS animal welfare standards must use WOAH as a minimum standard.

5.2 Differentiating between signs of unconsciousness and signs of death

The AVA is of the opinion when animals are slaughtered, they must be humanely rendered unconscious by stunning until death. There must be clearly documented defined checks in place to allow people involved in the supply chain to differentiate between unconsciousness and death.

Stunning targets should be monitored under ESCAS and all facilities should have tested contingency plans in place as well as a requirement for monitoring stunning targets and effective backup systems being in place.

The AVA is supportive of the Australian Meat Industry Council's 'Industry Animal Welfare Standard for Livestock Processing Establishments Preparing Meat for Human Consumption (Edition 3)'¹ including the development of documented procedures including the following stunning targets at a minimum:

- when, penetrating captive bolt and non-penetrating percussive devices are used, at least 96% of animals are stunned effectively with the first application of the stunning method;
- when electrical stunning is used, at least 99% of animals have the electrodes applied in the optimum position and 98% or more of the animals show no sign of starting the process of return of consciousness; and

¹ Australian Meat Industry Council's 'Industry Animal Welfare Standard for Livestock Processing Establishments Preparing Meat for Human Consumption: Edition 3 2022. https://amic.org.au/wp-content/uploads/2021/10/AMIC-Ed-3-Industry-Animal-Welfare-Standard_Final-effective-1-Jan-2022.pdf



- when controlled atmosphere (CO₂) stunning is used, 98% or more of animals show no signs of starting the process of return of consciousness.

5.3 Method for throat cut

There must be no ambiguity in relation to throat cutting technique and it should adhere to guidelines outlined in ESCAS/WOAH or LGAP. Auditing systems should ensure appropriate training is in place at facilities that addresses any cultural and/or language barriers.

Contact

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