



**Respondent No:** 1  
**Login:** Registered

**Responded At:** Feb 17, 2023 13:45:53 pm  
**Last Seen:** Feb 17, 2023 01:52:44 am

Q1. **Is your feedback on behalf of an organisation?** Yes

Q2. **Please provide the name of the organisation**

AniMark Ltd

Q3. **Which state or territory do you live in?** Queensland

Q4. **What industry or sector do you represent?** Other livestock export industry representatives

Q5. **Which challenges would you like to comment on? (select all that apply)**

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

1.4 Audit sharing and allocation of noncompliance responsibility

Q6. **In your experience, does this challenge exist?** Unsure

Q7. **Please provide details and suggest possible solutions**

not answered

Q8. **Please provide details**

not answered

Q9. **Please provide clarification or amendment**

Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not, however we provide the following observations and commentary where we believe the AniMark/LGAP framework provides a suitable approach. This is applicable to all provided answers. LGAP requires certification bodies to meet requirements aligned with ISO/IEC 17065:2012. Auditors must go through an approval process which includes an assessment of competencies and qualifications related to animal welfare and auditing processes.

Q10. **In your experience, does this challenge exist?** Unsure

Q11. **Please provide details and suggest possible solutions**

not answered

Q12. **Please provide details**

not answered

Q13. **Please provide clarification or amendment**

LGAP requires certification bodies to meet requirements aligned with ISO/IEC 17065:2012. Auditors must go through an approval process which includes an assessment of competencies and qualifications related to animal welfare and auditing processes.

Q14. In your experience, does this challenge exist? Unsure

Q15. Please provide details and suggest possible solutions

not answered

Q16. Please provide details

not answered

Q17. Please provide clarification or amendment

Animark has discussed this topic with some ESCAS auditors and the feedback is that this is generally not an issue, with the exception of some minor examples: Standard 22- Interpretation of: Single stroke/cut: Deep, uninterrupted fast stroke of the knife. Blade does not leave wound until act is complete. Standard 24.4 - 10 seconds from final resting position Also, EANs provide specific explanation of what auditors must audit, leaving little opportunity for interpretation.

Q18. In your experience, does this challenge exist? Unsure

Q19. Please provide details and suggest possible solutions

not answered

Q20. Please provide details

not answered

Q21. Please provide clarification or amendment

LGAP solves the issue of audit duplication and responsibility for addressing Corrective Action Requests (CARs). As a facility-based program, LGAP places the responsibility for addressing issues on the operators themselves, regardless of whose supply chain was affected. It reduces the need for multiple audits and helps to ensure that the same high standards are being applied across all facilities. This helps to eliminate confusion and potential inconsistencies, which can arise when duplicate audits are being conducted. Additionally, LGAP also helps to ensure that any CARs identified during an audit are addressed in a timely and effective manner.

Q22. In your experience, does this challenge exist? not answered

Q23. Please provide details and suggest possible solutions

not answered

Q24. Please provide details

not answered

Q25. Please provide clarification or amendment

not answered

Q26. In your experience, does this challenge exist? not answered

Q27. Please provide details and suggest possible solutions

not answered

**Q28. Please provide details**

not answered

**Q29. Please provide clarification or amendment**

not answered

**Q30. In your experience, does this challenge exist?** not answered

**Q31. Please provide details and suggest possible solutions**

not answered

**Q32. Please provide details**

not answered

**Q33. Please provide clarification or amendment**

not answered

**Q34. Include a description of the challenge and suggest a possible solution.**

not answered

**Q35. Would you like to add another challenge?** not answered

**Q36. Include a description of the challenge and suggest a possible solution.**

not answered

**Q37. Would you like to add another challenge?** not answered

**Q38. Include a description of the challenge and suggest a possible solution.**

not answered

**Q39. Would you like to add another challenge?** not answered

**Q40. Include a description of the challenge and suggest a possible solution.**

not answered

**Q41. Would you like to add another challenge?** not answered

**Q42. Include a description of the challenge and suggest a possible solution.**

not answered

**Q43. Which challenges would you like to comment on? (select all that apply)**

- 2.1 Overall standard or detailed requirements
- 2.2 Expectation of 100% compliance
- 2.7 Methods to verify traceability
- 2.9 Third-party traceability providers
- 2.10 Attribution of noncompliance

Q44. In your experience, does this challenge exist? Unsure

Q45. Please provide details and suggest possible solutions

not answered

Q46. Please provide details

not answered

Q47. Please provide clarification or amendment

Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not, however we provide the following observations and commentary where we believe the AniMark/LGAP framework provides a suitable approach. This is applicable to all provided answers. Annex E - LGAP Standards - Articulates Animark's existing approach to C + T standards. These revised standards have been endorsed by Animark's standards committee, which includes animal welfare expertise

Q48. In your experience, does this challenge exist? Unsure

Q49. Please provide details and suggest possible solutions

not answered

Q50. Please provide details

not answered

Q51. Please provide clarification or amendment

The LGAP standard does not mandate 100% compliance. However, it provides the means for efficient identification and resolution of non-compliance through internal monitoring mechanisms such as internal audits, comprehensive management systems incorporating standard operating procedures and work instructions for facility personnel, and a continual training regimen.

Q52. In your experience, does this challenge exist? not answered

Q53. Please provide details and suggest possible solutions

not answered

Q54. Please provide details

not answered

Q55. Please provide clarification or amendment

not answered

Q56. In your experience, does this challenge exist? not answered

Q57. Please provide details and suggest possible solutions

not answered

**Q58. Please provide details**

not answered

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**Q59. Please provide clarification or amendment**

not answered

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**Q60. In your experience, does this challenge exist?** not answered

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**Q61. Please provide details and suggest possible solutions**

not answered

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**Q62. Please provide details**

not answered

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**Q63. Please provide clarification or amendment**

not answered

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**Q64. In your experience, does this challenge exist?** not answered

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**Q65. Please provide details and suggest possible solutions**

not answered

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**Q66. Please provide details**

not answered

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**Q67. Please provide clarification or amendment**

not answered

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**Q68. In your experience, does this challenge exist?** not answered

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**Q69. Please provide details and suggest possible solutions**

not answered

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**Q70. Please provide details**

not answered

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**Q71. Please provide clarification or amendment**

not answered

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**Q72. In your experience, does this challenge exist?** not answered

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**Q73. Please provide details and suggest possible solutions**

not answered

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**Q74. Please provide details**

not answered

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**Q75. Please provide clarification or amendment**

not answered

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**Q76. In your experience, does this challenge exist?** Unsure

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**Q77. Please provide details and suggest possible solutions**

not answered

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**Q78. Please provide details**

not answered

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**Q79. Please provide clarification or amendment**

AniMark has proposed clear, outcomes-based control and traceability standards. See Annex E provided as a reference for this submission.

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**Q80. In your experience, does this challenge exist?** Unsure

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**Q81. Please provide details and suggest possible solutions**

not answered

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**Q82. Please provide details**

not answered

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**Q83. Please provide clarification or amendment**

Standards should be outcomes-based and do not prescribe a method or specific technology to be used to achieve those outcomes. A prescription will stifle innovation.

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**Q84. In your experience, does this challenge exist?** Unsure

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**Q85. Please provide details and suggest possible solutions**

not answered

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**Q86. Please provide details**

not answered

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**Q87. Please provide clarification or amendment**

AniMark has proposed clear, outcomes-based control and traceability standards. See Annex E provided as a reference for this submission.

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**Q88. In your experience, does this challenge exist?** Unsure

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**Q89. Please provide details and suggest possible solutions**

not answered

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**Q90. Please provide details**

not answered

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**Q91. Please provide clarification or amendment**

Technology is an enabler and shouldn't be prescribed

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**Q92. In your experience, does this challenge exist?** Unsure

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**Q93. Please provide details and suggest possible solutions**

not answered

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**Q94. Please provide details**

not answered

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**Q95. Please provide clarification or amendment**

AniMark has proposed clear, outcomes-based control and traceability standards. See Annex E provided as a reference for this submission.

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**Q96. In your experience, does this challenge exist?** not answered

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**Q97. Please provide details and suggest possible solutions**

not answered

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**Q98. Please provide details**

not answered

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**Q99. Please provide clarification or amendment**

not answered

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**Q100. In your experience, does this challenge exist?** not answered

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**Q101. Please provide details and suggest possible solutions**

not answered

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**Q102. Please provide details**

not answered

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**Q103. Please provide clarification or amendment**

not answered

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**Q104. In your experience, does this challenge exist?** Unsure

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Q105**Please provide details and suggest possible solutions**

not answered

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Q106**Please provide details**

not answered

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Q107**Please provide clarification or amendment**

LGAP includes approval for 3rd party providers to ensure that their system is compliant with ESCAS requirements. AniMark has a standard dedicated to external traceability providers.

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Q108**In your experience, does this challenge exist?** Unsure

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Q109**Please provide details and suggest possible solutions**

not answered

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Q110**Please provide details**

not answered

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Q111**Please provide clarification or amendment**

Animark's non-conformance system attributes non-compliance in a fair and transparent manner, with the relevant party being held responsible. Responsibility for non-compliances should be placed with the facility in question as that entity is in the best position to enact corrective actions.

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Q112**In your experience, does this challenge exist?** not answered

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Q113**Please provide details and suggest possible solutions**

not answered

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Q114**Please provide details**

not answered

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Q115**Please provide clarification or amendment**

not answered

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Q116**Include a description of the challenge and suggest a possible solution.**

not answered

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Q117**Would you like to add another challenge?** not answered

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Q118**Include a description of the challenge and suggest a possible solution.**

not answered

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Q119**Would you like to add another challenge?** not answered

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Q120**Include a description of the challenge and suggest a possible solution.**

not answered

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Q121**Would you like to add another challenge?** not answered

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Q122**Include a description of the challenge and suggest a possible solution.**

not answered

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Q123**Would you like to add another challenge?** not answered

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Q124**Include a description of the challenge and suggest a possible solution.**

not answered

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Q125**Which challenges would you like to comment on? (select all that apply)**

- 3.1 Framework 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
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Q126**In your experience, does this challenge exist?** Unsure

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Q127**Please provide details and suggest possible solutions**

not answered

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Q128**Please provide details**

not answered

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Q129**Please provide clarification or amendment**

Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not, however we provide the following observations and commentary where we believe the AniMark/LGAP framework provides a suitable approach. This is applicable to all provided answers. The revised noncompliance management policy should be based on the principles of continual improvement and procedural fairness. It should acknowledge that degrees of noncompliance exist, that corrective actions should give the facility an opportunity to remedy the root cause of the noncompliance, and that facilities should be able to continue to operate while the noncompliance is correct. Annex A provides an example of a fair and transparent non-compliance management system which is designed to encourage the continuous improvement cycle to operate effectively.

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Q130**In your experience, does this challenge exist?** Unsure

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Q131**Please provide details and suggest possible solutions**

not answered

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Q132**Please provide details**

not answered

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Q133**Please provide clarification or amendment**

There should be clear guidance what is considered minor/major/critical CAR. There should be a "feedback to the facility" (observation, area for improvement) option for everything that is not a CAR yet but could escalate in the future.

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Q134In your experience, does this challenge exist? Unsure

Q135Please provide details and suggest possible solutions

not answered

Q136Please provide details

not answered

Q137Please provide clarification or amendment

Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not.

Q138In your experience, does this challenge exist? Unsure

Q139Please provide details and suggest possible solutions

not answered

Q140Please provide details

not answered

Q141Please provide clarification or amendment

CARs should be escalated based on a matrix system which is available to the industry. This will ensure the escalation process is consistent and transparent. LGAP has a matrix for CAR escalation based on impact and number of instances.

Q142In your experience, does this challenge exist? Unsure

Q143Please provide details and suggest possible solutions

not answered

Q144Please provide details

not answered

Q145Please provide clarification or amendment

LGAP has specific timeframes for corrective actions and escalation of non-compliances. These timeframes reflect precedents set by analogues systems in other industries.

Q146In your experience, does this challenge exist? Unsure

Q147Please provide details and suggest possible solutions

not answered

Q148Please provide details

not answered

**Q149Please provide clarification or amendment**

Allegations of noncompliance should be treated as such, allegations, and due process followed in assessing whether the allegation contains sufficient objective evidence to demonstrate noncompliance with a requirement of ESCAS. Allegations should need to meet a number of criteria to progress to be accepted and actioned, including, for example, that they are specific and include objective evidence and the allegory has access to direct or first-hand information related to the alleged noncompliance. The complaints process articulate in Annex A and will be provided via email. Allegations that do not meet the above criteria should not be published publically.

**Q150In your experience, does this challenge exist?** Unsure

**Q151Please provide details and suggest possible solutions**

not answered

**Q152Please provide details**

not answered

**Q153Please provide clarification or amendment**

Auditors should be responsible for minor and major CAR management. AniMarks nonconformance system utilises auditors as the primary manager of the CAR process for minor and major nonconformances but with AniMark oversight.

**Q154In your experience, does this challenge exist?** Unsure

**Q155Please provide details and suggest possible solutions**

not answered

**Q156Please provide details**

not answered

**Q157Please provide clarification or amendment**

The Animark IT system provides a central database of historic data which is available to auditors and decision makers to use as contextual information.

**Q158In your experience, does this challenge exist?** not answered

**Q159Please provide details and suggest possible solutions**

not answered

**Q160Please provide details**

not answered

**Q161Please provide clarification or amendment**

not answered

**Q162In your experience, does this challenge exist?** Unsure

Q163**Please provide details and suggest possible solutions**

not answered

Q164**Please provide details**

not answered

Q165**Please provide clarification or amendment**

Risk rating should be completed based on a matrix assessment that takes into consideration of the following: previous audit outcomes, traceability practices, operations which includes personnel and infrastructure, methods of restraint, method of slaughter, current audit outcome, exporters outcomes. Information required to complete facility risk rating can be captured by the auditor as part of the audit process. (This is also a LGAP approach, Annex A).

Q166**In your experience, does this challenge exist?** Unsure

Q167**Please provide details and suggest possible solutions**

not answered

Q168**Please provide details**

not answered

Q169**Please provide clarification or amendment**

Animark's IT system has the ability for immediate/automated notifications and communications for CAR's.

Q170**Include a description of the challenge and suggest a possible solution.**

not answered

Q171**Would you like to add another challenge?** not answered

Q172**Include a description of the challenge and suggest a possible solution.**

not answered

Q173**Would you like to add another challenge?** not answered

Q174**Include a description of the challenge and suggest a possible solution.**

not answered

Q175**Would you like to add another challenge?** not answered

Q176**Include a description of the challenge and suggest a possible solution.**

not answered

Q177**Would you like to add another challenge?** not answered

Q178**Include a description of the challenge and suggest a possible solution.**

not answered

Q179Which challenges would you like to comment on? (select all that apply)	4.1 Facility risk ratings 4.2 Consolidation of ESCAS requirements
Q180In your experience, does this challenge exist?	Unsure
Q181Please provide details and suggest possible solutions  not answered	
Q182Please provide details  not answered	
Q183Please provide clarification or amendment  Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not, however we provide the following observations and commentary where we believe the AniMark/LGAP framework provides a suitable approach. This is applicable to all provided answers. Risk rating should be completed based on a matrix assessment that takes into consideration of the following: previous audit outcomes, traceability practices, operations which include personnel and infrastructure, methods of restraint, method of slaughter, current audit outcome, exporters' outcomes. Information required to complete facility risk rating can be captured by the auditor as part of the audit process. (This is also a LGAP approach, Annex A).	
Q184In your experience, does this challenge exist?	Unsure
Q185Please provide details and suggest possible solutions  not answered	
Q186Please provide details  not answered	
Q187Please provide clarification or amendment  The revised ESCAS framework should allow for the use of a common naming convention, including an ID code identifier for identifying facilities. AniMark has such a convention which has been implemented in some Vietnamese supply chains and is being proposed for use in Indonesia.	
Q188In your experience, does this challenge exist?	Unsure
Q189Please provide details and suggest possible solutions  not answered	
Q190Please provide details  not answered	
Q191Please provide clarification or amendment  LGAP requirements are noted in two documents: the LGAP Certification Rules and the LGAP Standards. Additional information is provided in the Animarks IT system and is available for relevant parties. Animark supports any initiative to consolidate and simplify the presentation of ESCAS information.	
Q192In your experience, does this challenge exist?	not answered

Q193**Please provide details and suggest possible solutions**

not answered

Q194**Please provide details**

not answered

Q195**Please provide clarification or amendment**

not answered

Q196**Include a description of the challenge and suggest a possible solution.**

not answered

Q197**Would you like to add another challenge?**

not answered

Q198**Include a description of the challenge and suggest a possible solution.**

not answered

Q199**Would you like to add another challenge?**

not answered

Q200**Include a description of the challenge and suggest a possible solution.**

not answered

Q201**Would you like to add another challenge?**

not answered

Q202**Include a description of the challenge and suggest a possible solution.**

not answered

Q203**Would you like to add another challenge?**

not answered

Q204**Include a description of the challenge and suggest a possible solution.**

not answered

Q205**Which challenges would you like to comment on? (select all that apply)**

5.2 Differentiating between signs of unconsciousness and signs of death  
5.4 Requirements for landing sites or physical transportation  
5.7 Interpretation of Standard 29

Q206**In your experience, does this challenge exist?**

not answered

Q207**Please provide details and suggest possible solutions**

not answered

Q208**Please provide details**

not answered

Q209**Please provide clarification or amendment**

not answered

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Q210**In your experience, does this challenge exist?** not answered

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Q211**Please provide details and suggest possible solutions**

not answered

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Q212**Please provide details**

not answered

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Q213**Please provide clarification or amendment**

not answered

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Q214**In your experience, does this challenge exist?** not answered

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Q215**Please provide details and suggest possible solutions**

not answered

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Q216**Please provide details**

not answered

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Q217**Please provide clarification or amendment**

not answered

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Q218**In your experience, does this challenge exist?** not answered

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Q219**Please provide details and suggest possible solutions**

not answered

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Q220**Please provide details**

not answered

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Q221**Please provide clarification or amendment**

not answered

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Q222**In your experience, does this challenge exist?** not answered

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Q223**Please provide details and suggest possible solutions**

not answered

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Q224**Please provide details**

not answered

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Q225 **Please provide clarification or amendment**

not answered

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Q226 **In your experience, does this challenge exist?** not answered

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Q227 **Please provide details and suggest possible solutions**

not answered

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Q228 **Please provide details**

not answered

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Q229 **Please provide clarification or amendment**

not answered

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Q230 **In your experience, does this challenge exist?** not answered

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Q231 **Please provide details and suggest possible solutions**

not answered

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Q232 **Please provide details**

not answered

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Q233 **Please provide clarification or amendment**

not answered

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Q234 **In your experience, does this challenge exist?** not answered

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Q235 **Please provide details and suggest possible solutions**

not answered

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Q236 **Please provide details**

not answered

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Q237 **Please provide clarification or amendment**

not answered

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Q238 **In your experience, does this challenge exist?** Unsure

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Q239 **Please provide details and suggest possible solutions**

not answered

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Q240 **Please provide details**

not answered

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**Q241Please provide clarification or amendment**

Animark as an ESCAO may not be best positioned to assess whether this is a challenge for the industry or not, however we provide the following observations and commentary where we believe the AniMark/LGAP framework provides a suitable approach. This is applicable to all provided answers. LGAP standards focus on looking for signs of insensibility rather than unconsciousness, which reflects contemporary approaches.

**Q242In your experience, does this challenge exist?** not answered

**Q243Please provide details and suggest possible solutions**

not answered

**Q244Please provide details**

not answered

**Q245Please provide clarification or amendment**

not answered

**Q246In your experience, does this challenge exist?** Unsure

**Q247Please provide details and suggest possible solutions**

not answered

**Q248Please provide details**

not answered

**Q249Please provide clarification or amendment**

LGAP addresses the need of suitable infrastructure and equipment to ensure animal welfare compliance during transportation.

**Q250In your experience, does this challenge exist?** not answered

**Q251Please provide details and suggest possible solutions**

not answered

**Q252Please provide details**

not answered

**Q253Please provide clarification or amendment**

not answered

**Q254In your experience, does this challenge exist?** not answered

**Q255Please provide details and suggest possible solutions**

not answered

Q256**Please provide details**

not answered

Q257**Please provide clarification or amendment**

not answered

Q258**In your experience, does this challenge exist?** Unsure

Q259**Please provide details and suggest possible solutions**

not answered

Q260**Please provide details**

not answered

Q261**Please provide clarification or amendment**

Standards should be outcomes focused and identify WHAT is required and where possible avoid prescribing HOW these outcomes are to be achieved as prescription limits the possibility of innovation and adaptation.

Q262**In your experience, does this challenge exist?** not answered

Q263**Please provide details and suggest possible solutions**

not answered

Q264**Please provide details**

not answered

Q265**Please provide clarification or amendment**

not answered

Q266**Include a description of the challenge and suggest a possible solution.**

not answered

Q267**Would you like to add another challenge?** not answered

Q268**Include a description of the challenge and suggest a possible solution.**

not answered

Q269**Would you like to add another challenge?** not answered

Q270**Include a description of the challenge and suggest a possible solution.**

not answered

Q271**Would you like to add another challenge?** not answered

Q272**Include a description of the challenge and suggest a possible solution.**

not answered

Q273**Would you like to add another challenge?** not answered

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Q274**Include a description of the challenge and suggest a possible solution.**

not answered

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Q275**Confidentiality Is your response confidential?** No

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Q276**Please specify the parts of your response that are confidential**

not answered

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Q277**Publication on our website Do you agree to your response being published on our website?** Yes

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Q278**Please de-identify my response** not answered

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Q279**Confirm that you have read and understand this privacy notice.** Yes

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Q280**Confirm that you have read and understand this declaration.** Yes

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