



Respondent No: 5
Login: Registered

Responded At: Feb 21, 2023 16:19:09 pm
Last Seen: Feb 20, 2023 11:14:59 am

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

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

Australian Alliance for Animals

Q3. **Which state or territory do you live in?** New South Wales

Q4. **What industry or sector do you represent?** Animal welfare groups

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
- 1.5 Sample sizes for audits
- 1.6 Inter-audit gap
- 1.7 Use of other surveillance methods

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

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

This challenge exists. We agree with the identified deficiencies and risks outlined in section 1.1. Many of these were also identified in the Inspector-General's 2021 review of ESCAS. Auditing quality is critical to the integrity of ESCAS. It is our view that this has not been upheld in the past leading to substandard facilities being approved under ESCAS for receiving Australian livestock.

Q8. **Please provide details**

not answered

Q9. **Please provide clarification or amendment**

not answered

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

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

This challenge exists. We agree with the identified deficiencies and risks outlined in section 1.2. Auditing quality is critical to the integrity of ESCAS.

Q12. **Please provide details**

not answered

Q13. **Please provide clarification or amendment**

not answered

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

Q15. Please provide details and suggest possible solutions

This challenge exists. We agree with the identified deficiencies and risks outlined in section 1.3. Auditing quality and consistency is critical to the integrity of ESCAS.

Q16. Please provide details

not answered

Q17. Please provide clarification or amendment

not answered

Q18. In your experience, does this challenge exist? not answered

Q19. Please provide details and suggest possible solutions

not answered

Q20. Please provide details

not answered

Q21. Please provide clarification or amendment

not answered

Q22. In your experience, does this challenge exist? Yes

Q23. Please provide details and suggest possible solutions

This challenge exists and should be rectified.

Q24. Please provide details

not answered

Q25. Please provide clarification or amendment

not answered

Q26. In your experience, does this challenge exist? Yes

Q27. Please provide details and suggest possible solutions

This is a major challenge as demonstrated by many ESCAS non-compliances detected over the years in facilities that had been audited only months or weeks prior. This challenge should be addressed by making real-time monitoring systems a requirement of ESCAS.

Q28. Please provide details

not answered

Q29. Please provide clarification or amendment

not answered

Q30. In your experience, does this challenge exist? Yes

Q31. Please provide details and suggest possible solutions

Agree this is a deficiency of the audit regime. A range of audit approaches should be adopted and real-time monitoring introduced as a requirement of ESCAS approval.

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
- 2.3 Use of indicator events
- 2.4 Critical control points for traceability
- 2.5 Timely provision of data
- 2.6 Variability in approaches
- 2.7 Methods to verify traceability
- 2.8 Accuracy of traceability data
- 2.9 Third-party traceability providers
- 2.10 Attribution of noncompliance
- 2.11 Proportionate noncompliance

Q44. In your experience, does this challenge exist?

Yes

Q45. Please provide details and suggest possible solutions

Agree this is a challenge that should be addressed through the introduction of an overall control and traceability standard under ESCAS.

Q46. Please provide details

not answered

Q47. Please provide clarification or amendment

not answered

Q48. In your experience, does this challenge exist?

Yes

Q49. Please provide details and suggest possible solutions

All compliance regimes should strive for 100% compliance. Allowing for acceptable levels of noncompliance may be appropriate in regulatory regimes governing inanimate objects, but non-compliance under ESCAS often results in animal suffering. Allowing for an acceptable level of leakage or other ESCAS non-compliance would be unconscionable and risks sending the wrong message to the Australian community and to the industry which already has a poor compliance record.

Q50. Please provide details

not answered

Q51. Please provide clarification or amendment

not answered

Q52. In your experience, does this challenge exist?

Yes

Q53. Please provide details and suggest possible solutions

Agree this is a challenge. Technology should be utilised to incorporate such indicator events into ESCAS.

Q54. Please provide details

not answered

Q55. Please provide clarification or amendment

not answered

Q56. In your experience, does this challenge exist? Yes

Q57. Please provide details and suggest possible solutions

Agree this is a challenge. Additional technological requirements should be incorporated into ESCAS to mitigate risks at critical control points.

Q58. Please provide details

not answered

Q59. Please provide clarification or amendment

not answered

Q60. In your experience, does this challenge exist? Yes

Q61. Please provide details and suggest possible solutions

This is a significant challenge and one that should be addressed by making real-time supply chain monitoring a requirement of ESCAS.

Q62. Please provide details

not answered

Q63. Please provide clarification or amendment

not answered

Q64. In your experience, does this challenge exist? Yes

Q65. Please provide details and suggest possible solutions

Variability in systems, oversight, and data custodianship is a significant challenge that should be addressed through a standardised requirement for such systems under ESCAS.

Q66. Please provide details

not answered

Q67. Please provide clarification or amendment

not answered

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

Q69. Please provide details and suggest possible solutions

not answered

Q70. Please provide details

not answered

Q71. Please provide clarification or amendment

not answered

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

Q73. Please provide details and suggest possible solutions

not answered

Q74. Please provide details

not answered

Q75. Please provide clarification or amendment

not answered

Q76. In your experience, does this challenge exist? not answered

Q77. Please provide details and suggest possible solutions

not answered

Q78. Please provide details

not answered

Q79. Please provide clarification or amendment

not answered

Q80. In your experience, does this challenge exist? Yes

Q81. Please provide details and suggest possible solutions

Methods to verify traceability face several challenges as identified in section 2.7 which should be addressed through a standardised requirement for traceability verification methods under ESCAS including a combination of technological and on-ground methods.

Q82. Please provide details

not answered

Q83. Please provide clarification or amendment

not answered

Q84. In your experience, does this challenge exist? not answered

Q85. Please provide details and suggest possible solutions

not answered

Q86. Please provide details

not answered

Q87. Please provide clarification or amendment

not answered

Q88. In your experience, does this challenge exist? not answered

Q89. Please provide details and suggest possible solutions

not answered

Q90. Please provide details

not answered

Q91. Please provide clarification or amendment

not answered

Q92. In your experience, does this challenge exist? not answered

Q93. Please provide details and suggest possible solutions

not answered

Q94. Please provide details

not answered

Q95. Please provide clarification or amendment

not answered

Q96. In your experience, does this challenge exist? Yes

Q97. Please provide details and suggest possible solutions

Challenges with the accuracy of traceability data must be addressed. EIDs should be a requirement of ESCAS.

Q98. Please provide details

not answered

Q99. Please provide clarification or amendment

not answered

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

Q101. Please provide details and suggest possible solutions

not answered

Q102Please provide details

not answered

Q103Please provide clarification or amendment

not answered

Q104In your experience, does this challenge exist? Yes

Q105Please provide details and suggest possible solutions

Conflicts of interest on behalf of third-party traceability providers is a serious challenge that should be addressed through structural and governance requirements built into an overall traceability standard under ESCAS.

Q106Please provide details

not answered

Q107Please provide clarification or amendment

not answered

Q108In your experience, does this challenge exist? Yes

Q109Please provide details and suggest possible solutions

Attributing noncompliance should be improved with stronger traceability standards including real-time monitoring and EIDs. Exporters must remain responsible for the fate of exported animals up to the point of slaughter. This provides the necessary incentive for exporters to invest in improving compliance.

Q110Please provide details

not answered

Q111Please provide clarification or amendment

not answered

Q112In your experience, does this challenge exist? Yes

Q113Please provide details and suggest possible solutions

Any leakage is a noncompliance with ESCAS and should be recorded as such, but the number of animals leaked should be a factor determining the level of noncompliance recorded.

Q114Please provide details

not answered

Q115Please provide clarification or amendment

not answered

Q116Include a description of the challenge and suggest a possible solution.

not answered

Q117Would you like to add another challenge? not answered

Q118Include a description of the challenge and suggest a possible solution.

not answered

Q119Would you like to add another challenge? not answered

Q120Include a description of the challenge and suggest a possible solution.

not answered

Q121Would you like to add another challenge? not answered

Q122Include a description of the challenge and suggest a possible solution.

not answered

Q123Would you like to add another challenge? not answered

Q124Include a description of the challenge and suggest a possible solution.

not answered

Q125Which challenges would you like to comment on? (select all that apply)

- 3.1 Framework for noncompliance
- 3.4 Utilisation of auditors in noncompliance management
- 3.5 Effective framework for analysing noncompliances
- 3.6 Incentives for performing higher than a minimum standard
- 3.8 Timeframe for compliance information exchange

Q126In your experience, does this challenge exist? Yes

Q127Please provide details and suggest possible solutions

The Biosecurity Guidelines for the Management of Non-compliance were identified for review several years ago. Failing to take into account the cumulative noncompliance record of an exporter is a major deficiency in the Department's compliance framework and must be addressed as a priority. A wider range of non-compliance sanctions should also be introduced, particularly those that are punitive in nature. Major non-compliances and repeat offenders have traditionally been dealt with by simple administrative responses that do not provide a sufficient deterrence.

Q128Please provide details

not answered

Q129Please provide clarification or amendment

not answered

Q130In your experience, does this challenge exist? not answered

Q131Please provide details and suggest possible solutions

not answered

Q132Please provide details

not answered

Q133Please provide clarification or amendment

not answered

Q134In your experience, does this challenge exist? not answered

Q135Please provide details and suggest possible solutions

not answered

Q136Please provide details

not answered

Q137Please provide clarification or amendment

not answered

Q138In your experience, does this challenge exist? not answered

Q139Please provide details and suggest possible solutions

not answered

Q140Please provide details

not answered

Q141Please provide clarification or amendment

not answered

Q142In your experience, does this challenge exist? not answered

Q143Please provide details and suggest possible solutions

not answered

Q144Please provide details

not answered

Q145Please provide clarification or amendment

not answered

Q146In your experience, does this challenge exist? not answered

Q147Please provide details and suggest possible solutions

not answered

Q148Please provide details

not answered

Q149Please provide clarification or amendment

not answered

Q150In your experience, does this challenge exist? Yes

Q151Please provide details and suggest possible solutions

The challenges of Departmental involvement in responding to non-compliances detected via audits is acknowledged, however, all non-compliances detected via audits must still be reported to the Department to ensure there is still an accurate record of a facility's history of non-compliance.

Q152Please provide details

not answered

Q153Please provide clarification or amendment

not answered

Q154In your experience, does this challenge exist? Yes

Q155Please provide details and suggest possible solutions

The lack of an effective reporting framework for the Department to analyse non-compliance data and trends over time is a significant shortcoming that needs to be addressed.

Q156Please provide details

not answered

Q157Please provide clarification or amendment

not answered

Q158In your experience, does this challenge exist? Yes

Q159Please provide details and suggest possible solutions

Further incentives should be introduced to encourage beyond compliance behaviours among exporters, however, such incentives should not take the form of lower levels of surveillance or traceability requirements. Traceability and animal welfare measures should remain consistent and other incentives should be identified.

Q160Please provide details

not answered

Q161Please provide clarification or amendment

not answered

Q162In your experience, does this challenge exist? not answered

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

not answered

Q164**Please provide details**

not answered

Q165**Please provide clarification or amendment**

not answered

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

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

These practical challenges need to be addressed to ensure ESCAS timeframes are not undermined.

Q168**Please provide details**

not answered

Q169**Please provide clarification or amendment**

not answered

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

Q179**Which challenges would you like to comment on? (select all that apply)** 4.1 Facility risk ratings
4.3 Mechanism for continual improvement in ESCAS

Q180 **In your experience, does this challenge exist?** Yes

Q181 **Please provide details and suggest possible solutions**

The process for determining facility risk ratings should not give rise to loopholes allowing non-complying facilities to continue receiving Australian livestock. This should be reviewed as a priority.

Q182 **Please provide details**

not answered

Q183 **Please provide clarification or amendment**

not answered

Q184 **In your experience, does this challenge exist?** Unsure

Q185 **Please provide details and suggest possible solutions**

not answered

Q186 **Please provide details**

not answered

Q187 **Please provide clarification or amendment**

.

Q188 **In your experience, does this challenge exist?** not answered

Q189 **Please provide details and suggest possible solutions**

not answered

Q190 **Please provide details**

not answered

Q191 **Please provide clarification or amendment**

not answered

Q192 **In your experience, does this challenge exist?** Yes

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

The lack of periodic review mechanism for ESCAS is a challenge that should be rectified to ensure the ESCAS remains fit for purpose.

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)**

- 5.1 Consistency of ESCAS Animal Welfare (AW) Standards with WOAHS recommendations
- 5.2 Differentiating between signs of unconsciousness and signs of death
- 5.3 Method for throat cut
- 5.5 Specificity in the Standards
- 5.6 Consistency of structure and nomenclature of requirements under ESCAS with best practice standards design
- 5.8 Requirement to keep records of outcomes of processes

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

Yes

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

There appear to be many instances where the ESCAS Animal Welfare Standards lack the detail of the WOAHS standards. This should be rectified with a review of the ESCAS standards. In the case of any inconsistencies, the ESCAS should only adopt WOAHS standards when doing so will lead to higher animal welfare outcomes. In circumstances where the WOAHS standards fall below equivalent Australian domestic standards, like those relating to stunning, the Australian standard should be adopted. Stunning before slaughter should be a mandatory requirement of ESCAS.

Q208**Please provide details**

not answered

Q209**Please provide clarification or amendment**

not answered

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

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

not answered

Q212**Please provide details**

not answered

Q213**Please provide clarification or amendment**

not answered

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

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

not answered

Q216**Please provide details**

not answered

Q217**Please provide clarification or amendment**

not answered

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

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

not answered

Q220**Please provide details**

not answered

Q221**Please provide clarification or amendment**

not answered

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

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

not answered

Q224**Please provide details**

not answered

Q225**Please provide clarification or amendment**

not answered

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

Q227Please provide details and suggest possible solutions

not answered

Q228Please provide details

not answered

Q229Please provide clarification or amendment

not answered

Q230In your experience, does this challenge exist? not answered

Q231Please provide details and suggest possible solutions

not answered

Q232Please provide details

not answered

Q233Please provide clarification or amendment

not answered

Q234In your experience, does this challenge exist? not answered

Q235Please provide details and suggest possible solutions

not answered

Q236Please provide details

not answered

Q237Please provide clarification or amendment

not answered

Q238In your experience, does this challenge exist? Yes

Q239Please provide details and suggest possible solutions

The lack of clarity around unconsciousness and death in the standards, and what to do in the event that an animal regains consciousness during slaughter, must be addressed as a matter of urgency.

Q240Please provide details

not answered

Q241Please provide clarification or amendment

not answered

Q242In your experience, does this challenge exist? Yes

Q243 Please provide details and suggest possible solutions

It is concerning that a standard as important as the method of cutting an animal's throat is not clear. This should be addressed as a matter of urgency.

Q244 Please provide details

not answered

Q245 Please provide clarification or amendment

not answered

Q246 In your experience, does this challenge exist? not answered

Q247 Please provide details and suggest possible solutions

not answered

Q248 Please provide details

not answered

Q249 Please provide clarification or amendment

not answered

Q250 In your experience, does this challenge exist? Yes

Q251 Please provide details and suggest possible solutions

The ESCAS Animal Welfare Standards require immediate review to ensure they are clear and comprehensive.

Q252 Please provide details

not answered

Q253 Please provide clarification or amendment

not answered

Q254 In your experience, does this challenge exist? Yes

Q255 Please provide details and suggest possible solutions

The ESCAS Animal Welfare Standards require immediate review to ensure they are clear and comprehensive.

Q256 Please provide details

not answered

Q257 Please provide clarification or amendment

not answered

Q258 In your experience, does this challenge exist? not answered

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

not answered

Q260**Please provide details**

not answered

Q261**Please provide clarification or amendment**

not answered

Q262**In your experience, does this challenge exist?** Yes

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

The lack of any requirement to maintain records of processes is a challenge to the effectiveness of the audit regime and should be rectified by introducing the relevant requirement into ESCAS.

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

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

not answered

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

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

not answered

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

Q278 **Please de-identify my response** Yes

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

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