

**LGAP Standards 2021 Public Comment Register**

<b>LGAP 1000 - Fundamentals &amp; vocabulary</b>				
Clause No./ Subclause No./Annex	Paragraph/Figure/ Table/Note	Comment (Justification for Change)	Proposed Change to Text	Standards Committee Decision & Summary
N/A	Page 6, marked up paragraph	This appears to be the first attempt to define the purpose of LGAP. It needs to be stronger that the primary purpose is about animal welfare and can deliver secondary benefits relating to disease control, food safety and product integrity.	Revise.	No change required. LGAP overall is a animal welfare and management program and LGAP1004 is specific to traceability systems. While traceability supports animal welfare, the LGAP1004 standard is about traceability systems and not animal welfare specifically.
4	New	As identified many times, the standards have now had two new terms included that require clarification: 'traceability location' and 'traceability party'.	Either define and include these in this section or revise the definitions for facility and operator.	No change required. The terms are defined in LGAP1000.
4.4	N/A	Why add IT to the name. It is not an IT conformance system, it is an animal welfare conformance system.	Delete	No change required. The AniMark IT Conformance System is indeed an IT system that is used to record audits, nonconformities and certification and not an animal welfare conformance system.
4	N/A	Definitions in v1.5 include markups, markups on markups and highlights. They are very difficult to read and need revision based on the comments provided in this submission. For example t, the term 'Reuse' is defined, where this submission clearly argues that no reuse should be allowed. Also, industry needs to be engaged to ensure terms being defined reflect current terminology and their use.	Revise	Partially accepted. The terms and definitions have been re-checked for accuracy. The final versions will not be marked up or highlighted. Changes from the previous version will be in italics.
N/A	Page 6, paragraph 2	What is the statement that livestock treatment is of increasing concern to the community? The community has always been concerned and there is increasing focus by media and animal rights groups.	Revise to reflect reality	No change required. The introduction is based on the OIE commentary and community trust research. This is the same introduction from the original standards reviewed and approved in 2015, 2016, 2018 and 2020.
N/A	Page 9, 1 <sup>st</sup> para	Refer comments above. WHY LGAP is being implemented needs to be included in the paragraph.	Revise	No change required. The introduction is based on the OIE commentary and community trust research. This is the same introduction from the original standards reviewed and approved in 2015, 2016, 2018 and 2020.
4.3 (Definition of 'animal husbandry')		"Livestock" not explicitly or separately defined [assumed to include animals such as cattle, sheep, goats, buffalo etc as per references to example types of livestock included in s7.10 of LGAP1001]	Add definition of "Livestock" on page 19 and refer to new section reference (X.X) in section 4.3 on page 15	Accepted. Noted that the livestock species are defined in the LGAP Certification Rules the definition of livestock is to be added to LGAP1000.
<b>LGAP 1001 - Requirements for animal welfare and management</b>				
Clause No./ Subclause No./Annex	Paragraph/Figure/ Table/Note	Comment (Justification for Change)	Proposed Change to Text	Standards Committee Decision & Summary
N/A	Page 6, new paragraph	This appears to be the first attempt to define the purpose of LGAP. It needs to be stronger that the primary purpose is about animal welfare and can deliver secondary benefits relating to disease control, food safety and product integrity.	Revise	No change required. The introduction is based on the OIE commentary and community trust research. This is the same introduction from the original standards reviewed and approved in 2015, 2016, 2018 and 2020.
6.3 a)	N/A	The term 'critical movement events' is included here, but is defined in a table buried in LGAP 1004. Must be included in LGAP 1000 Definitions	Add to definitions	No change required. The term critical movement event is defined in LGAP1000.
8.2 & 8.3	N/A	Refer to comments for LGAP 1004, but applying arbitrary timeframes for activities to be delivered is not helpful or justifiable. If we are serious about traceability, it must allow for effective traceability, meets regulatory requirements and demonstrates responsible management.	Revise	Partially accepted. The timeframes in LGAP1004 have been updated and now must ensure the data is captured immediately and everything else must occur to ensure an animal can be traced in 10days.
Annex I	(i)	Should it read Annex "C" (relating to Fitness for Transport) instead of Annex "B"?	If yes, then change to Annex "C"	Accepted. Change made.
Annex L		Check consistency with proposed changes in Annex C of LGAP1004 (see additional ticks and change heading to "Type of Event")	Suggest make consistent with Annex C in LGAP1004 and change heading to "Type of Event" consistent with Table 1 example in section 9.2(b)(ii) in LGAP1004 on page 23	No change required. The committee agreed that while the additional check could be added, the table in Annex L reflected the minimum requirement and should remain at that.
Annex M	M.2	Should "LGAP1004 - Requirements for traceability systems used by Operators & Facilities" be added to the list?	If relevant and applicable, then add LGAP1004 to list in Annex M section M.2	No change required. While they can be referenced as a useful document, normative means they'll be audited against and Operators and Facilities are not audited against LGAP 1004.
Annex M	M.5.1	Check consistency with proposed changes in section 11.4 of LGAP1004 (relating to visual static imagery)	Suggest make consistent with section 11.4 of LGAP1004 on page 30. Also should reference in Annex M, sM5.1(e) include (a) to "(d)" instead of (c)?	Accepted. The final versions will be consistent with each other.
Annex M	M.5.2	Check consistency with proposed changes in section 11.5 of LGAP1004 (relating to video surveillance)	Suggest make consistent with section 11.5 of LGAP1004 on page 31	Accepted. The final versions will be consistent with each other.
<b>LGAP1002 - Requirements for management systems of Operators, Facilities and Traceability System Providers</b>				
Clause No./ Subclause No./Annex	Paragraph/Figure/ Table/Note	Comment (Justification for Change)	Proposed Change to Text	Standards Committee Decision & Summary
6.3, 8.5, 8.6, 8.7, 8.8, 8.9, 8.10, 8.11, 8.12	All	This is a repeat of the requirements of LGAP 1004. Rather than trying to capture them, it would be better to refer to the need to meet the requirements of LGAP 1004. The way it is currently presented can result in conflicting requirements in the future.	Meet all requirements of LGAP1004	Not accepted. LGAP 1004 does not apply to Operators and Facilities. These requirements are the only requirements in LGAP 1004 which are applicable to Operators and Facilities and only if they use a TSP under LGAP 1004.
8.8		Check consistency of LGAP1002 with proposed changes in section 11.16 & 11.17 of LGAP1004	Suggest make consistent with sections 11.16 & 11.17 of LGAP1004 on page 23	Accepted. The changes to 11.16 and 11.17 will be updated in LGAP1002.
8.9		Check consistency of LGAP1002 with proposed changes in section 11.18 of LGAP1004 (e.g. 3.5% in LGAP1004 vs 3% in LGAP1002)	Suggest make consistent with sections 11.18 of LGAP1004 on page 23	Accepted. The changes to 11.18 will be updated in LGAP1002.
8.1		Check consistency of LGAP1002 with proposed changes in section 11.7 of LGAP1004	Suggest make consistent with sections 11.7 of LGAP1004 on page 24	Accepted. The changes to 11.7 will be updated in LGAP1002.
8.11		Check consistency of LGAP1002 with proposed changes in section 11.14 of LGAP1004	Suggest make consistent with sections 11.14 of LGAP1004 on page 25 [see also comment in s11.14(a)(ii) 'deal with the consequences']	Accepted. The changes to 11.14 will be updated in LGAP1002.
8.12		Check consistency of LGAP1002 with proposed changes in section 11.18 of LGAP1004	Suggest make consistent with sections 11.8 of LGAP1004 on page 25	Accepted. The changes to 11.18 will be updated in LGAP1002.
<b>LGAP 1003 - Requirements for Operator chain of custody</b>				
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N/A	Page 6, new paragraph	This appears to be the first attempt to define the purpose of LGAP. It needs to be stronger that the primary purpose is about animal welfare and can deliver secondary benefits relating to disease control, food safety and product integrity.	Revise	No change required. The introduction is based on the OIE commentary and community trust research. This is the same introduction from the original standards reviewed and approved in 2015, 2016, 2018 and 2020.
<b>LGAP 1004 - Requirements for traceability systems for Operators and Facilities</b>				
Clause No./ Subclause No./Annex	Paragraph/Figure/ Table/Note	Comment (Justification for Change)	Proposed Change to Text	Standards Committee Decision & Summary
4		There is no clear definition for the purpose of the system or definition of the objective of the data collection process. For example is the objective to digitise the collection of information so that it can be monitored and assessed, thereby allowing animals to be traced as part of an automated computer based system?	Add a clear set of overarching goals and objectives that clearly state what is hoped to be achieved through the implementation of a traceability system, and how that will improve animal welfare outcomes. For example, developing a computerised system that will provide a holistic perspective of an animal's welfare from birth to death. Or a system that will allow an animal's records to be identified so that its current location and welfare can be assessed.	No change required. A traceability system may not be a computerised one and to specify this would preclude other types of systems being implemented.
4.1	(a)	Check consistency of terminology label (e.g. "individually identified animals" in section 4.1(a) vs (d) and throughout LGAP1004)	Update in each place where using "animals" (insert "individually identified animals") to distinguish from "group of animals" throughout the document for consistency. For example, at s4.1(a) the full label is used vs at s4.1(b)(i) & (d), s4.3(a) & (ii)(2) etc	Partially Accepted. The requirement was updated and all others checked for accuracy, keeping in mind the need to be able to identify groups of animals (i.e. sheep and goats) which is allowable under ESCAS.
4.1	(b)	Check choice, appropriateness and consistency (where relevant) of timeframes given for different tracing or reporting tasks (e.g. s4.1(b) - 72 hrs; s4.3(a)(ii) - 48 hrs; s9.3 - immediately; s10.2 - 60 hrs (?); s10.4 - 24 hrs)	Depending on reasons for decisions behind timeframes, adjust accordingly and where relevant in s4.1(b), s4.3(a)(ii), s9.3, s10.2 & s10.4	Accepted. The timeframe in 4.1 was updated from 72hours to 10days. 10days was decided as adequate time to collect, capture and store traceability data given different markets and then perform the traceability exercise.
4.2		Suggest changing wording to better express intent of section	Suggest changing wording from "shall not interfere" to include "not be at cross purposes"	No change required. The intent of the requirement is to ensure the other functions of the system do not clash or impede the traceability function. It was decided by the committee that "not at cross purpose" doesn't fully capture this intent.
4.3		This section has some ambiguous statements, for example, the requirement states that an animal or group of animals should be located within 48 hours of the beginning of the tracing effort. The phrasing suggests that this is a system response time when it is probably descriptive of the accuracy of the data.	Clarify the system requirements to state how long it should take for the system to provide a result (e.g. in near 'real-time' if the system is designed to be a digitised computerised system) or 48 hours if the search is a manual one. Alternatively, the description could state that the intention is to provide the physical location of the animal at a point in time no longer than 48 hours prior to the time the trace was initiated.	Accepted. Timeframe in 4.3 was updated from 48hours to 10days. This is now consistent with update to 4.1. 10days was decided as adequate time to collect, capture and store traceability data given different markets and then perform the traceability exercise. 4.1 and 4.3 applies to different types of systems. 4.1 is all systems while 4.3 refers to supply chain systems and being able to trace an animal all the way back through the supply chain not just one step forward and one step back as required in 4.1.
4.3 vs 4.1		Adjust wording to indicate difference	Insert "for a Provider with Supply chain traceability systems" after "traceability system"	Partially accepted. The application of the headings were reviewed and confirmed to be accurate. The wording in the headings was reviewed and updated to be made clearer throughout the entire standard which requirements apply to whom.
5.1	(a)(i)	Agree relevant to avoid conflicts of interest, however, should it be broader than just "direct financial interests" e.g. Related parties, influence etc	Depending on reason for decision to choose "direct financial interest", may expand wording to include e.g. Related parties, influence etc	No change required. The intent of the requirement is to prevent an ACB or Approved Auditor auditing a traceability system they provide. There are also provisions in the LGAP Rules that further require impartiality of ACB's and Auditors.
5.1	(c) & NOTES	May need to be more explicit /define who are "Program" participants	Suggest including definition of "Program participants" in LGAP1000 (only has "Program Owner") and maybe reference to where located in LGAP Certification Rules & Requirements	Accepted. Program Participants are provided for in the LGAP Certification Rules. All definitions from the LGAP Certification Rules will be added to LGAP1000.
5.2		This section is unclear but appears to relate to the interconnectivity of different tracing systems. For example a scanner and a data aggregation point. However, it lacks clarity on requirements for the developers of the different systems e.g. an electronic tag, a scanner and an aggregation system - all three of these could be developed by different organisations however the information they collect or are able to store is not defined and therefore is not aligned.	Provide clarity for the minimal requirements and formats of the data being collected and transferred. This will allow the developers of the different systems to coordinate efforts and produce a cohesive system independently that will operate to minimal standards conjointly.	No change required. The standard cannot prescribe data formats that move traceability systems to be an automated digital system. This would not allow for innovation.
6.1	(b)	Suggest expand wording beyond "affected"	Insert "but not limited to / influenced by the following factors:" after "affected by"	Accepted and change made.
6.2		This section is too broad and should be clarified. It lacks definition for operation manuals, training requirements, online help, training facilities, levels of expertise required prior to operation etc..	Provide greater clarity around what is expected to allow personnel and users to use the system. For example as a minimum, specify what the provider should offer to help the users, (e.g. online support documentation).	No change required. 6.2 requires the Traceability System Provider (TSP) to establish processes for how to use their system. 6.3 requires TSP personnel to be competent and to have training and resources available to users (who may be the TSP or an Operators or Facility using the system). Each system will be different so the training and resources required will be different and cannot be prescribed.
6.4		This section is too broad and lacks clarity. The lack of clarity implies that service providers can set their own standards. For example, if a system fails, one operator could mandate to ensure it is replaced / operational within 4 hours, another could mandate 4-months.	Specify minimal requirements and standards that need to be met ensuring consistency in systems definition, cost, and efficacy.	No change required. It would be difficult to specify the proposed level of detail without forcing all systems to operate in one particular way. These aspects are entirely dependant on the system being provided.
6.6		Adjust wording to make clearer. For example, what type of analysis is expected. What is the definition of an incident, how is 'reliable and accurate' defined?	Provide clearer definitions of the requirements to set minimal standards that all providers have to meet	Accepted. A note was added to clarify where in the standard to refer to for analysis.
7.1		Suggest inserting a simple diagram to illustrate Animal identification process on page 17	see suggested Example Diagram A	Partial acceptance. Diagrams will be developed and placed in guidance manuals as diagrams generally do not go into standards.
7.1		The document lacks any definitions for the data formats and standards required (other than that specified for the dateline later in the document). Without defining the standards regarding data formats, will lead to the data being gathered and disseminated in an inconsistent manner.	Produce a clear and succinct definition for each data element (e.g. First Name, Last Name, Title, Full physical address ideally conforming to the accepted industry standard, Full business name including a recognised identifier ABN, GPS to ISO standards).	No change required. Specifying data formats precludes all manner of systems. Also requirements elsewhere address systems being able to interrelate to accept data.

8.2	(b)	No definition of "Party" in LGAP1000	Include definition of "Party" to identify / distinguish (if different) from "Operator", "Facility" and/or "Provider"	No change required. Definitions from the LGAP Certification Rules will be added to LGAP1000 for completion. Traceability party is a defined term in 1000 which states who the party may be.
8.2		Suggest inserting a simple diagram to illustrate Traceability connection of animals on page 18	see suggested Example Diagram B	No change required. Diagrams will be developed and included in the guidance manual.
8.2	a)	The implication is that the certificate changes making previous levels of certification "incorrect"	Provide clarity over the consequences of incorrect LGAP certification, i.e. how can it be monitored / assessed	No change required. Noted that this comment can be addressed further by guidance material. In line with Annex G of The LGAP Certification Rules, a minimum of Level 2 certification must be held by Operators and Facilities who handle Australian livestock.
8.3		Given intention to promote "humane & considerate treatment of livestock", may need to address cruelty, not just animal health & food risk to humans?	Perhaps add additional subsection (c) to cover off cruelty too, not just animal health & food safety risk to humans [see also reference in s6.2 in LGAP1001]	No change required. Committee deliberation was that cruelty is not suitable terminology and if you have animal welfare you will not have cruelty. The method of identification and application of an ID to an animal was also discussed and reference was made to the AIT Standards Committee deliberations which considered human and animal safety with the RSPCA with respect to application of ID's to animals which does not mention cruelty.
8.4	a)	The identifiers need to have a clearer definition i.e. are they a manufactured physical item, or are they a logical identifier that leverages some form of physical or geographic recognition (e.g. physical appearance of the animal or proximity to a group of animals it was in transit with)	Provide clarity regarding defining the identifiers and the requirements for each	Accepted. Requirement was updated to include reference to LGAP1001 - Annex D Methods of identification to add clarity to the identification requirements.
8.4	(c)	Include references to definitions for "Livestock" (already highlighted above in LGAP1000 section 4.3), "Legal Owner" & "Ownership" of identifiers and/or animals (contrast with difference to "physical custody", "Party", "Provider") also not currently included in LGAP1000 definitions.	see also comment at 8.2 above - add definitions for 4.3 of LGAP1000 to cover "Legal Owner of Identifier"	Partially accepted. Legal owner is taken to be understood as the normal meaning. Livestock definition to be added to LGAP1000.
8.5	(c)(ii)	Should reason for replacement be also included? Minimal requirements / standards should be defined that permit identification to be reapplied to an animal avoiding the issue where animals are inappropriately reidentified.	Suggest add new subsection 5 to include requirement for reason for replacement [similar to wording in s8.8(d)(i)(3)]	No change required. The reason for replacement is because the tag was found to be missing.
8.5	(d) & (e)	Should this section be consistent with s8.8(d)(iii) & (iv) plus NOTE on page 21?	Suggest make 8.5(d) & (e) consistent with s8.8(d)(iii) & (iv) and include NOTE page 21	No change required. The reason for replacement is because the tag was found to be missing.
8.5		Should this section include a reference to the red flag testing and % targets for multiple identifier replacements for Operators or Facilities and register requirements for destroyed identifiers in LGAP?	Make reference to 3.5% target of lost or replaced identifiers in s11.18(a)(ii) of LGAP1004 [note inconsistent with 3% target with s8.9(a)(i) in LGAP1002]. Make additional reference to relevant section for register keeping of destroyed identifiers	Partially accepted. There was significant changes made to section 11 Verification monitoring and reporting. The %s and reporting requirements refer to the analysis of monitoring data not the carrying out of the activity. Noting also the %s has now been removed from section 11.
8.6		This section appears repetitive (same as s8.5 but for Traceability System Providers WITH Traceability Services) but confusing as order of sections in s8.6 is slightly different to s8.5. For example, s8.6 is same as 8.5(b), s8.7 is same as 8.5(c)(i) to (v), s8.8(a) is same as s8.5(c)(ii), and s8.8(c)&(d)(i)&(ii) not included in s8.5 but perhaps should be as would apply under both types of Providers (i.e. Systems only or both Systems & Services)?	Perhaps suggest including s8.5 and s8.6 in tabular form for ease of comparison between what is same / different requirements for Traceability System Providers vs Providers with both Traceability Systems & Services, noting comments to left	No change required. The guidance manuals are in a tabular format and will be available once the standard is finalised.
9.1		Suggest inserting a simple diagram to illustrate Movement Traceability through Supply Chain on page 22	see suggested Example Diagram C	No change required. Diagrams will be developed and included in the guidance manuals.
9.2	(a)	Type of Event label is more appropriate than 'Relevant Event' in Annex C - suggest make consistent for ease of terminology	Change headings from "Relevant Event" to "Type of Event" in Annex C header and table	Accepted Noting: 9.2 b) ii amended to also specify "detail in relation to the type of event" as the information in Table 1 is more about the detail behind the three types of events (also amended in Table 1 headings etc.).
9.2	(a)(iii)2 & 3 NOTE	The term "moved around" may need more definition and practicality / reasonableness filter. For example, an Operator on Farm moving livestock from one pen to another or changing paddocks vs movement within a Facility (e.g. Meatworks Depot areas)	Perhaps expand on wording in NOTE under s9.2(a)(iii) and maybe include additional coding initials under "Transaction event" in Table 1 on page 23 to include moving / changing pens or within parts of farm / facility locations	Accepted. Removed 9.2iii2 and the reference to this in LGAP1001. Committee removed the requirement to capture movement of animals around a traceability location.
9.2	(b)	The label / term "method" is a bit confusing here. Perhaps the example 'methods' provided in Table 1 on page 23 are relevant but refer to the 'reason for movement' rather than a 'method'?	Change term "method" to "reason for movement" and the example coding initials provided should be relevant for most users of LGAP1004, hence suggest being prescriptive to give a consistent terminology language	No change required. Committee deliberation was that method was appropriate.
9.3	(b)	Timeframe for Traceability data to be captured is "immediately after" whereas previously been quite prescriptive (e.g. 48 hrs)	Perhaps explicitly state timeframe (e.g. Within 24 hrs). See also previous comments regarding choice, appropriateness and consistency (where relevant) of timeframes - see s4.1(b) above	No change required. The committee deliberation was that immediately after is required for instances that the information is not captured as the event occurs. The timeframes in 4.1 refer to tracing an animal not capturing, collecting and storing the traceability data on the register.
9.4		The meaning of this section (i.e. must manage & segregate livestock into same 'species' which is not defined in LGAP1000 and does it include gender type?) seems to get lost in the wording of this section. Only other reference indicator was for 'compatible groups' for transportation in Annex N sN7.1 (c) in LGAP1001?	This section may benefit from rewording / organising to state if different process required to manage / segregate (LGAP vs Non-LGAP or different certification levels). Also include a definition of 'species' and include key factors to identify species (e.g. breed, gender, with / without horns etc)	No change required. This requirement is to enable the system to record or handle segregation not perform the segregation. The ordinary definition of species is applied, noting the livestock species are provided in LGAP1000.
9.5		Simplification may be required here if same requirements (i.e. s9.1 to 9.4) are applicable to Traceability System Providers with Traceability Services (s9.5)	Simply state that same requirements are applicable for Traceability System Providers with Traceability Services. Again, perhaps tabular form may be of benefit here (as per comment for s8.5 & s8.6 above)?	Partially accepted. Updates to the headings will occur to make clearer who the requirements apply to. Guidance manuals will also be in a table format.
10.1	(b)	Suggest inserting a simple diagram to illustrate Current Location in Supply Chain on page 25 [see also related Example Diagram B - Traceability connection of animals suggested above for s8.2 on page 18]	see suggested Example Diagram D [see also related Diagram B suggested for s8.2 above]	No change required. Diagrams will be developed and provided in guidance manuals.
10.2	(a)(i)	Timeframe for Traceability data to be collected and stored is "60 hours" [contrast with s9.3(b) above for immediate capture of Traceability data]	See previous comments regarding choice, appropriateness and consistency (where relevant) of timeframes. See s4.1(b) above for other references to different stipulated timeframe periods. Section 10.2(a)(ii) seems to open up choice of timeframe whereas previously quite prescriptive (e.g. 24hrs, 48hrs, 72hrs etc)	Accepted. The overall goal of the system is to trace an animal in 10days and the collection and storage of the traceability data must now allow for that goal to be met. 9.3 refers to when the data must be captured not when it is stored on the register.
10.2	(b) & (c)(ii)	These sections refer to transmission and receiving of traceability data in a "secure" manner - no definition or guidance given here on what that means? A definition for "hours" needs to be provided. For example is 60 hours, 60 consecutive hours or business hours?	Noting that there is an intention to allow choice of system for traceability providers, perhaps may still need further guidance regarding minimum IT security standards? [Also see s11.5(d) reference to 'secure' video surveillance footage]	No change required. Secure is a defined term in LGAP1000. The reference to 60hours has been removed and replaced with the ability to achieve the purpose of the system - to trace animals within 10days. Reference to hours was removed and days are business days as per the definition in the LGAP Certification Rules - which are being moved over to LGAP1000.
10.2, 10.3 & 10.4	NOTE below 10.2(c)(ii) & 10.3 & NOTE below s10.4(c)(ii)	Reference to "authorised" parties but no definition provided in LGAP1000 to identify who they are?	Perhaps include definition of "Party" and "Authorised Party" (if different to "Party") in LGAP1000 or reference in s1 Scope to cover who referring to for greater clarity of application?	No change required. Authorised party is taken to have the ordinary meaning.
10.3		This requirement is too broad and does not recognise the system requirements and data standards needed for the data register	Include a reference to state the requirement that the system will need to validate the data prior to uploading it to the register to ensure that the data meets the prerequisite formats and requirements	No change required. This requirement relates to interoperability or the ability of different systems to share data. This is also an outcomes focussed requirement to allow for data transmission.
10.4	(a)(i) & (ii)	Similar comments to above regarding timeframe choice [consistency and applicability of 24 hours in s10.4(a)(i) to store on register compared to 60 hours in s10.2(a)(i) to collect and store on register] & whether prescriptive vs open to choice?	Adjust stated number of hours and wording in section depending on decision made in reference to appropriate, consistent timeframes	Accepted. The overall goal of the system was updated to be able to trace an animal in 10 days and the provision of data to or from traceability parties now requires the achievement of that goal.
10.5 & 10.7		These sections don't seem to add much and merely state that s10.2 & s10.4 are applicable to both Traceability System Providers as well as Traceability System Providers with Services.	See earlier comments (same for s8.5 & s8.6) regarding perhaps making into tabular form for comparison ease?	No change required. One ensures processes are in place, the other ensures those processes are followed where they have to be. This would only apply if the TSP provides services. If they did not they would not be responsible for these activities rather the Operators and Facilities would be and their requirements are contained in 1001 and 1002.
10.6 & 10.8		These sections are not included in s10.1 to s10.4 - assume only specifically applicable to Traceability System Providers who provide Traceability services?	If yes, then leave as is, otherwise adjust for s10.6 & s10.8 to be applicable to both Traceability System Providers and those who also provide Traceability Services (transmitting traceability data)	Partially accepted. The headings are being updated to increase clarity on who the requirements apply to.
10.8		Define immediate and the consequences for not meeting this immediacy requirement, together with a definition of how to understand who the relevant parties are	Define immediate using the required timeframe (e.g. minutes / hours / days). If this is not met are there any escalation processes? If so, what are they? Will failure to notify result in penalties, if so, what are they likely to be? Will the system need to provide proof of notification in the form of log files / reports etc.?	No change required. Immediately is taken to mean immediately which is the general interpretation. If the report isn't provided a nonconformity can be issued at audit in line with the LGAP Certification Rules.
11.1		Define the intent of this process. It seems strange that the validation process occurs after the data has been loaded to the register rather than before it is loaded. Perhaps the intent is to ensure that the correct information has been correctly uploaded to the register? If it is, then this should be clarified. Alternatively, if the intent is to ensure that the correct information has been uploaded and it is consistent with data provided by other providers (e.g. 100 animals were sent to an abattoir and 100 animals were received). How can the provider be expected to get access to the other providers data and what happens if there is an inconsistency? Should this be the responsibility of the provider or the register systems administrator?	To be clearer with the requirements to ensure consistency across any data shared	No change required. This requirement is about setting up processes for verification.
11.1	(c)	The reference to "precise and legible" seems to indicate that there may be instances where traceability data is in written form (i.e. Not electronic?)	Perhaps slight change to wording 'clear and succinct' rather than 'legible' indicating written form?	Partially accepted. Replaced legible with clear.
11.1	(d)	Include reference to s11.2 here for ease of reader to locate examples of types of information constitutes "supporting evidence"	Insert reference to s11.2 here for supporting evidence	No change required. Supporting evidence is not necessarily a term but rather a range of things combined. Providing examples may not be relevant because it is more about what it has to contain rather than what it is.
11.2		Define documented information. For example, is the system expected to collect images of documents or digitised documents?	To be specific regarding the requirements in this section	No change required. Documented information is a defined term in LGAP1000.
11.4	(b)	Understand the goal intention of 'framed, focused and sufficient lighting' in imagery (photos), but how practical is this to achieve in relation to livestock animals or if the animals are part of a herd?	Perhaps need to consider practical implications of this desired goal in terms of likelihood in reality for moving animals? What if the desired image isn't captured for all animals? Are there penalties for this?	No changes required. This requirement aims at achieving the outcome or goal and is designed to address the issue of poor image quality. Photo's are a type of supporting information that may be used (not shall be used). The context of how the photos are used also needs to be considered which is in part set by the Traceability System Providers process for supporting information. For example, photos may only be used for confirmation of slaughter. If a requirement is not met during an external audit then a nonconformity will be raised by the Approved Auditor and must be corrected and closed so that certification can be granted or continue. Failure to address nonconformities will result in suspension and withdrawal from the program as defined in the LGAP Certification Rules.
11.4	(d)(ii)	For ease of readability, move s11.4(d)(ii) up under 3 "GPS Location" and make subsection points	Make adjustment to order of sections/subsections for greater readability. For consistency, maybe also look to do same for s11.5(d)(ii) - move up under (d)(i)3 "GPS Location" and make subsection points	No change required by the Committee.
11.4	(e)	Should the 'preserved aspects' comment relate to (a) to (d) not just to (c)?	If yes, then amend (e) to state "(d)". Note that s11.5(e) refers to "secure" but makes no mention of "preserving" as in s11.4(e) - amend to include? [See also earlier comment regarding "secure" at s10.2]	No change required. Point 11.4(c) is not on the imagery but rather a process. Preserve is not the same as secure they are intended to convey two different aspects.
11.4 & 11.5		These two sections appear repetitive in terms of similar requirements for static visual imagery (s11.4) vs video surveillance footage (s11.5)	Perhaps suggest including s11.4 and s11.5 in tabular form for ease of comparison to show largely the same except for certain differences (as per earlier comments at s8.5 & s8.6 above)	No changes required. It was noted by the committee that one relates to photos and the other videos but is not necessarily repetitive and also allows for easier application of one or the other by the Traceability System Provider.
11.5	(f)	The reference of video footage to be "reviewed without delay" does not indicate by whom the review should be undertaken. Also needs further clarity re whether only capturing for 'critical movement events' or reviewing all event footage to pinpoint for 'critical' ones?	Suggest rewording of this subsection to ensure clearly stating what is required and by whom	No change required. The 'who' referred to in the requirement is either the Traceability System Provider who is providing the traceability services or the Operator or Facility who is using the system.
11.7		The label "incidents" seems to indicate a connection with an "event" rather than substance of this section which deals with "issues"	Consider changing "incidents" to "issues" to avoid confusion with use of "events" label. Also update change in s11.14 (a)&(b)	No change required. Incidents were discussed and it was determined that an incident is not an event or issue.
11.14	(a)(ii)	The reference to "deal with the consequences" is ambiguous and open to interpretation. Define "immediately" using a timeframe (minutes, hours, days) and a definition of consequences if not achieved	Make adjustment to reword and better define in terms of what needs to happen, by when, by whom [reference also appears in s8.11(a)(ii) & s11.1(e)(ii) of LGAP1002]	No change required. The terminology "deal with the consequences" is from ISO9001 and also used in LGAP1002.
11.14	d)	Define the prescribed timeframe	Make adjustment to reword and better define in terms of what needs to happen, by when, by whom	No change required. The prescribed timeframes will be provided in the LGAP Certification Rules.

11.17	(a)(iv)	The reference to "greater than expected" is subject to interpretation. Define what is meant by "greater than expected"	Make adjustment to reword and better define in terms of standard required (e.g. appropriateness & timing factors or considerations)	Partially accepted. Significant changes were made to section 11 for verification activities, great than expected now requires identification of irregularities in the data instead.
11.17	(a)(v)	This section appears to be similar to s11.8 however subsection (v) is not included previously?	If required, add subsection (v) wording to new subsection s11.8(e)	Partially accepted. Significant changes were made to section 11 for verification activities to clarify what is required.
11.17	(b)	Does "analysis" include the "monitoring data" referred to in s11.16(c)?	If not, then suggest including "and monitoring data" after "supporting evidence" in s11.17(b)	Partially accepted. Significant changes were made to section 11 for verification activities, analysis is required of all data from 11.15.
11.18		As above, define 'immediately' using a timeframe (minutes, hours, days) and a definition of consequences if not achieved. This will help the provider understand the expense of the services required to meet requirements (e.g. 24x7 services as opposed to business hours only service)	Make adjustment to reword and better define in terms of what needs to happen, by when, by whom	No change required. Immediately is taken to mean immediately which is the general interpretation. If the report isn't provided a nonconformity can be issued at audit in line with the LGAP Certification Rules. Additionally, significant changes were made to section 11 to clarify the requirements overall.
11.19		This section is very broad - assume applies to s11.6 to s11.12? It also assumes that the provider has access to data that they may not be responsible for providing, and that they have the skill sets to be able to meet the requirement. For example, a manufacturer of physical identifiers may not be equipped to conduct this type of analysis even if they have access to the data. In all likelihood this task is better suited to the administrator of the register	Suggest clarifying application to make more explicit	Partially accepted. The requirement only applies to traceability system providers that provide traceability services. The headings have been updated for clarity.
11.2		This section only refers to s11.6 - should it also include s11.13 to s11.18? This section appears to reflect a requirement outside of the normal remit of the traceability service providers who are primarily responsible for data collection, aggregation, and deployment. Ideally this section, as with sections 11.1 and 11.19, should fall into a separate classification of service provider responsible for the analysis, interpretation and monitoring of the data after it is loaded to the register.	If so, then make wording more explicit so clear what additional requirements are needed to be addressed	Partially accepted. The requirement only applies to traceability system providers that provide traceability services. The headings have been updated for clarity.
Annex A	(j) knowledge	Additional tick boxes to be checked	Check tick boxes for "Developing the system" and "System testing and validation"	No change required. The committee agreed that while the additional check could be added, the table in Annex A reflected the minimum competency requirements and should remain at that.
Annex A	(g) skills	Additional tick boxes to be checked	Check tick boxes for "Setting up the system (where relevant)"	No change required. The committee agreed that while the additional check could be added, the table in Annex A reflected the minimum competency requirements and should remain at that.
Annex B	(a)&(b)	Additional tick boxes to be checked	Check tick boxes for "Capturing traceability data"	No change required. The committee agreed that while the additional check could be added, the table in Annex B reflected the minimum competency requirements and should remain at that.
Annex B	(c)	Additional tick boxes to be checked	Check tick boxes for "Collecting and storing traceability data"	No change required. The committee agreed that while the additional check could be added, the table in Annex B reflected the minimum competency requirements and should remain at that.
Annex C		Type of Event label is more appropriate than "Relevant Event" in Annex C - suggest make consistent for ease of terminology	Change headings from "Relevant Event" to "Type of Event" in Annex C header and table, as advised for s9.2 above	No change required. Decision was to keep relevant event.
Annex C		Additional tick boxes to be checked	Check tick boxes for empty ones under "Transaction event"	No change required. The committee agreed that while the additional check could be added, the table in Annex C reflected the minimum requirement and should remain at that.
Annex D		See proposed suggestion of tabular format for greater readability and comparison. Also, query re choice of 48 hrs for timeframe (as per previous comments above in s4.1 etc)	Suggest reconfiguring into tabular format for ease of readability and comparison - 2 x 2 table with "Animal selection" and "Test Criteria" headings and subcategories of "Provide traceability systems" and "supply chain"	Partially accepted. The timeframes will be updated in line with 4.1 and 4.3.
11.6 c)	N/A	From this, it is unclear whether all supporting evidence should be retained or just a sample.	"A sample of supporting evidence."	No change required. This requirement refers to performing reconciliations between the locations, data and supporting evidence. All supporting evidence needs to be 'retained' but this requirement is not about retaining documented information it is about conducting reconciliations on all of the data i.e. a-c.
11.7 e)	N/A	Incorrect subclause number - should be e)	Revise	Accepted and change made.
11.8 b)	N/A	Livestock do not always leave the facility as breeding stock. They may stay at the facility. However, they will be removed from the consignment.	"The removal of livestock from a consignment as breeding stock."	Accepted. The requirement has been reworded to clarify that the breeder may remain at the location but it's status is updated to breeder in the system.
11.9	NOTE	This note refers to Certification Rules that are undefined. Noting previous comments about proposed timeframes, the prescribed timeframes should be risk based to ensure effort is being applied where the most benefit will be gained.	Define Rules and ensure they are risk based.	No change required. The LGAP Certification Rule timeframes will be prescribed soon. The definitions from the Rules will also be moved into LGAP1000.
11.10	N/A	'Any analysis undertaken...' is a very loose and undefined term that is meaningless. The requirement is covered by the term 'supporting evidence' already included in the sentence.	Remove reference to analysis undertaken.	Partially accepted. The reference to analysis has been updated.
11.11 a)	N/A	Retaining all data for a minimum of 2 years is unnecessarily prescriptive and of no benefit. This should identify the need to retain data for as long as necessary for verification and audit purposes, as well as providing input into an investigation or incident.	* retained for a period that will meet compliance purposes and any data relevant to an incident or investigation will be kept until the incident / investigation is closed.	No change required. The timeframe started at 7 years and the committee reduced it to 2 years which captures data over two audit cycles. This timeframe is 5 years less than normal conformity assessment record retention timeframes.
11.13	N/A	It does not make sense to say under Additional Requirements that it is a requirement to meet the general requirements of the section.	Delete	Partially accepted. The requirement 11.13 has been updated to clarify what a Traceability System Provider that also provides traceability services must implement.
11.14 c)	N/A	This does not make sense. If an incident is identified, this means the traceability system is working effectively and, therefore, does not need to be changed. The cause of the incident needs to be identified and changes made to minimise the prospect of reoccurrence, as part of continuous improvement.	"if necessary, make operational changes to	No change required. The requirement is prefaced with 'if necessary' so it is only required if a change to the system is identified as needing to happen
11.14 d) v. & vi.	N/A	Refer to 11.4 c) comments, above.	Delete	No change required. The requirement is prefaced with 'if necessary' so it is only required if a change to the system is identified as needing to happen.
11.14 d)	NOTE	This note refers to Certification Rules that are undefined. Noting previous comments about proposed timeframes, the prescribed timeframes should be realistic.	Define Rules and ensure they are realistic.	No change required. The prescribed timeframes will be provided in the LGAP Certification Rules.
11.15	N/A	This is not an additional requirement and is already specified in 11.11.	Delete	Partially accepted. Updates were made to requirements 11.13-11.19.
11.15 a)	N/A	Refer to comment re 11.11 a), above.		
11.16	N/A	Requiring 'analysis' to be undertaken is totally meaningless if the required outcome is undefined. Why is analysis needed? There might also be other ways to meet the requirement (if it were defined).	Delete clause	Analysis under 11.16 is required on the monitoring data, traceability data, supporting evidence and documented information. 11.17 requires a review of the analysis to determine if any irregularities or anomalies have occurred in
11.17 a) ii.	N/A	Livestock may or may not leave the location when they become breeding stock. They will, however, leave the supply chain	"... Leaving the supply chain as..."	Accepted. The intent of the requirement is to allow for the system to handle the change to a bred (as in a status change) and not necessarily remove the animal from the location.
11.17 a) v.	N/A	A Traceability System Provider will not always know if a facility has exceeded its capacity as there may be more than one TSP operating at a facility. It is the operator of the facility that must monitor this. This is not a traceability issue, it is a management issue.	Remove	No change required. The requirement applies to Traceability System Providers that provide traceability services so they will know the capacity of the facility in which they are working.
11.17 b)	N/A	'Any analysis undertaken...' is a very loose and undefined term that is meaningless. The requirement is covered by the term 'supporting evidence' already included in the sentence.	Remove reference to analysis undertaken.	Partially accepted. Updates were made to requirements 11.13-11.19 as per above.
11.18 a) ii. 1.	N/A	3.5% reflects the current industry average. So this is requiring that if the average is met, it must be reported. This will require significant resources for little benefit. This needs to be revised to reflect when a significant issue occurs.	Revise to 7%	Accepted. The %'s were for reporting anomalies to the Program Owner not an allowance. The deliberations of the committee resulted in significant updates to 11.13-11.19 which now requires reporting of all irregularities or anomalies in relation to breeders, replaced IDs or losses/mortalities rather than a %. Much deliberation was held over this particularly in relation to how the % would be calculated (i.e. over what timeframe and number of head). Given the vast differences in throughput, facility capacity, seasonal fluctuations and reporting periods the requirements were updated to report all irregularities and anomalies to the Program Owner. For breeders particularly, it was noted through consultation that pregnant animals may not be identified pre-export and there is a % that will become a breeder because of this mistake.
11.18 a) ii. 2.	N/A	As identified above, they do not always leave the facility, however, they do leave the supply chain. Also, this is not a traceability issue. This is a pre-export issue that is dealt with elsewhere.	Delete	Partially accepted. The requirement was updated significantly, the intent is to allow the system to change the status on an animal to a breeder if it is required, not remove the animal from the facility.
11.18 b)	N/A	'Any analysis undertaken...' is a very loose and undefined term that is meaningless. The requirement is covered by the term 'supporting evidence' already included in the sentence.	Remove reference to analysis undertaken.	Accepted. Significant changes have been made to 11.17 and 11.18.
11.20	N/A	It does not make sense to say under Additional Requirements that it is a requirement to meet the general requirements of the section.	Delete	Partially accepted. The requirement only applies to traceability system providers that provide traceability services. The headings have been updated for clarity.
8.1	-	Methods of identification allow for group identification. This does not allow for effective traceability and undermines the capacity of the standards to provide supply chain level assurance.	The traceability system shall have a method of identifying individual animals or groups of animals that is consistent with each Operator or Facility user's level of LGAP certification. Deletion of all subsequent references to 'groups of animals' throughout document.	No change required. The scope of LGAP is the same as ESCAS which allows for group identification of sheep and goats.
11.2	b)	Video surveillance is a critical supply chain traceability mechanism and should be set as a common requirement for all LGAP approved supply chains.	can include visual information comprising: i. static visual imagery; and ii. video surveillance.	No change required. Imposing video surveillance in all markets is impracticable and not in line with ESCAS. Additionally, there is little evidence to demonstrate that video surveillance is a critical supply chain traceability mechanism. In almost all cases of leakage in the reports analysed, the video was just turned off or shifted rendering it useless. There are alternative, combined mechanisms in place which can deliver the desired outcome in relation to traceability. There are also legal restrictions globally with having video surveillance in the workplace.
11.10	a)	We would like to see further guidance within the standard or in accompanying material around the meaning of 'non-fulfilment' of certification requirements to ensure consistent interpretation across providers.	-	No change required. The LGAP Certification Rules define nonconformity as "Non-fulfilment of a requirement or failure to demonstrate fulfilment of a requirement." Non-fulfilment is the opposite of fulfilment, the requirement is either fulfilled or not fulfilled and this is determined by the Approved Auditor.
11.18	a) ii. 1.	3.5% loss or replacement of identifiers does not set an acceptable standard for maintaining the integrity of animal identification. This target should be reduced to 1% or less.	1. 3.5% 1% or less of identifiers are lost or replaced;	Accepted. The %'s were for reporting anomalies to the Program Owner not an allowance. The deliberations of the committee resulted in significant updates to 11.13-11.19 which now requires reporting of all irregularities or anomalies in relation to breeders, replaced IDs or losses/mortalities rather than a %. Much deliberation was held over this particularly in relation to how the % would be calculated (i.e. over what timeframe and number of head). Given the vast differences in throughput, facility capacity, seasonal fluctuations and reporting periods the requirements were updated to report all irregularities and anomalies to the Program Owner. For breeders particularly, it was noted through consultation that pregnant animals may not be identified pre-export and there is a % that will become a breeder because of this mistake.

11.18	a) ii.2.	A blanket 3% allowance for livestock leaving the traceability location as 'breeding livestock' is unacceptable. Livestock intended for breeding purposes must be individually identified as such prior to export and only those animals should be permitted to leave approved supply chains.	2-3% or less of livestock leave the traceability location as breeding livestock;	Accepted. The %'s were for reporting anomalies to the Program Owner not an allowance. The deliberations of the committee resulted in significant updates to 11.13-11.19 which now requires reporting of all irregularities or anomalies in relation to breeders, replaced IDs or losses/mortalities rather than a %.  Much deliberation was held over this particularly in relation to how the % would be calculated (i.e. over what timeframe and number of head). Given the vast differences in throughput, facility capacity, seasonal fluctuations and reporting periods the requirements were updated to report all irregularities and anomalies to the Program Owner.  For breeders particularly, it was noted through consultation that pregnant animals may not be identified pre-export and there is a % that will become a breeder because of this mistake.
11.18	a) ii.3.	A 3% loss and mortality rate does not set an acceptable target for a traceability location. Onboard mortality rates under ASEL are set at 0.5% to 1% depending on the species. Why should the acceptable mortality rates be higher for in-market facilities given the risks to health and welfare are typically lower than those presented at sea? The loss and mortality rate should be reduced to at least the equivalent rates under the ASEL of 0.5% for cattle and buffalo and 1% for sheep and goats.  Otherwise, taken together with the allowance for 'breeding livestock' to leave the supply chain, this would allow for 6% of animals to leave approved supply chains without the need for a report to be made. This does not meet acceptable standards of traceability and would undermine the assurances LGAP seeks to provide. We also question whether this would be consistent with the exporter's reporting obligations under ESCAS.	3% 0.5% or less of livestock cattle or buffalo, or 1% or less of sheep or goats, are recorded as losses and mortalities	Accepted. The %'s were for reporting anomalies to the Program Owner not an allowance for leakage. The deliberations of the committee resulted in significant updates to 11.13-11.19 which now requires reporting of all irregularities or anomalies in relation to breeders, replaced IDs or losses/mortalities rather than a %.  Much deliberation was held over this particularly in relation to how the % would be calculated (i.e. over what timeframe and number of head). Given the vast differences in throughput, facility capacity, seasonal fluctuations and reporting periods the requirements were updated to report all irregularities and anomalies to the Program Owner.
General	General	-	Is the CB and auditor able to access the online traceability system? Will this include all data from each movement of animals, number, slaughter information and images of animals?	The traceability system may not be electronic or digital and it is not a system that AniMark or LGAP provides. Any system that is being used for traceability may seek to be certified under 1004.  But yes - the CB and Auditor should be provided access to the traceability system, traceability data, supporting evidence (photos) and all other data as part of the audit. This is a requirement for being certified.  If the audit is of the Traceability System Provider it will be different audit to an audit of a facility where they use a certified system.
General	General	-	How will traceability work for facilities that are LGAP approved but are supplied by importers who are not using LGAP for their whole supply chain? Will the auditor still be able to obtain traceability information for all animals if some exporters/importers are not using the LGAP database?	Under LGAP, a facility may receive livestock from non-LGAP certified importers as well as certified importers. If this is the case, the LGAP audit does not need to review traceability data for non-LGAP animals.  For livestock from LGAP certified importers, the facility must ensure traceability records are kept and available at audit regardless of if they use a LGAP1004 certified system.  If a 1004 certified system is used to do this for all or only some livestock they receive the
General	General	-	How will traceability work for facilities supplied by several exporters if they are all using different traceability systems?	Under LGAP the audit of the facility will look at all the systems they use to trace LGAP livestock. If the traceability systems being supplied by the exporters are also certified to 1004 then the facility audit would be reviewing the usage of the system in accordance with the usage requirements under 1002.
General	General	-	Are there any additional training requirements for auditors auditing LGAP1004. Is there any further auditor guidance and a checklist for this scope?	Yes, AniMark is developing training on 1004 for delivery to Auditors.
General	General	-	What will be the frequency of traceability audits required? Is this per facility or per supply chain?	The traceability system provider is the entity being audited and this may not be a facility or operator. The frequency is determined by the risk rating, low = annually, medium = 6monthly, high = 3monthly. The audit covers how the system is provided, and if the system provider also provides personnel to perform activities at a facility then the services are also audited.  If a facility is using a 1004 certified system, they will be audited against the usage requirements included in 1002 at their regular facility audit.
General	General	-	What are the alternatives in case of equipment failure (scanning equipment and cameras) for documenting livestock slaughter.	This needs to be determined by a process set by the Traceability System Provider. It will change depending on the type of system being used and equipment they have in place.
Introduction	Para 2 Sentence 2	"...is of increasing concern to the global community...." Is a subjective statement based on what? The global community has always been concerned with livestock treatment and we are unaware of any work to show it is increasing. We are aware that the media and animal rights groups have an increasing focus on this area, but they are not necessarily the 'global community'. Also, is the global community seeking assurances or is industry seeking to provide assurances?	"....the supply chain is of concern to the global community and the live export industry is seeking to provide assurances that certain...."	Committee noted the comments and no change required. This introduction is based on the OIE commentary and community trust research. It is not subjective.  To specify "live export industry" at this level incorrectly positions the application of LGAP. LGAP is for in-market facilities who do not consider themselves to be live exporters, they're feedlotter and abattoirs.  This is the same introduction which is from the original Standards and has been approved/reviewed in 2015, 2016, 2018 and 2020.
Introduction	Para 3	This sentence implies that the purpose of the standard is animal welfare. This needs to be made explicit. The Introduction of LGAP-1000 lists eight dot points that identify animal welfare as the key focus of LGAP (together with issues that address how animal welfare will be delivered or demonstrated – traceability, defining responsibilities, continuous improvement, benchmarking). All these documents need to be upfront that animal welfare is the driver.	Tracing animals is a critical function in delivering good animal welfare outcomes, which is the fundamental focus of LGAP.	Committee noted no change required. This is identified throughout the Standards and the existing paragraph conveys the intent adequately and appropriately.
Introduction	New	The Introduction fails to recognise the need for a risk based approach to be applied to setting standards. The requirements of standards need to reflect the inherent risk in a process and address it accordingly. They also need to offer flexibility to address varying risk between operators, facilities and markets with different risk profiles.	Add commentary about how risk is addressed in the standards and who was engaged to provide technical input in relation to risk.	Committee noted the comments and required no change as it is introductory in nature only. Also note that the list of who provided technical input would be extensive.
Introduction	New	The Introduction fails to note the need for outcomes-focused standards. As currently written, there is a mix of inputs, outputs, outcomes and repetition. Some standards are very prescriptive. This is not 'best practice' in terms of standards writing and will restrict innovation, which is required as part of continuous improvement.	Revise standards to focus on outcomes.	Committee noted the comment and required no change. Committee discussed the comparison to NTPS which are KPIs not standard requirements and that there is some degree of prescription in 1004 in particular due to the issues required to be addressed by MRAG.
1. Scope	Para 1	The first sentence fails to identify that traceability is required for good animal welfare. This needs to be explicit to understand the purpose of LGAP. Otherwise, it could be incorrectly assumed that LGAP's primary focus is some other issue, such as disease control, biosecurity, inventory control, etc.	"....that are intended for slaughter, as a key function of ensuring good animal welfare outcomes. Slaughter may incorporate..."	No change was required as it would be repetitive with the introduction.
4.1	1 <sup>st</sup> sentence	The primary purpose is not to monitor and track movement, this is WHAT is being done. The primary purpose must be WHY it is being done. Therefore, the primary purpose is to monitor and track movement to support good animal welfare. This is further reinforced by Clause 4.2 (addressed below) which defines secondary purposes.	"....to monitor and track movement to support good animal welfare through LGAP certified...."	No change required. The purpose of the traceability system is to perform traceability.
4.1 a) i.	N/A	This subclause (and all the way through the document and markups in LGAP 1001 and LGAP 1002) relates to a 'traceability location'. Noting that it is now a defined term in LGAP 1000 v1.5, it would assist reading if defined terms were capitalised.	Capitalise defined terms throughout all documents.	No change required. The LGAP standards have been based on style prescribed by ISO where capitalisation of defined terms does not occur.
4.1 a) iii.	N/A	This subclause (and all the way through the document and markups in LGAP 1001 and LGAP 1002) relates to a 'traceability location'. Noting that it is now a defined term in LGAP 1000 v1.5, it would assist reading if defined terms were capitalised.	Capitalise defined terms throughout all documents.	No change required. The LGAP standards have been based on style prescribed by ISO where capitalisation of defined terms does not occur.
4.1 b)	1 <sup>st</sup> sentence	Specifying 72 hours is unnecessarily prescriptive, indefensible (why 72? Why not 24hrs or 5 working days?) and may not meet expectations. Rather than prescribing a timeframe, a better approach would be to identify that it must be done in a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management.	"....groups of animals to be traced as soon as possible, within a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management, from a traceability location...."	Accepted. The timeframe in 4.1 was updated from 72hours to 10days. 10days was decided as adequate time to collect, capture and store traceability data given different markets and then perform the traceability exercise.
4.2	N/A	As currently written, this adds to the confusion of WHY the standard is needed. 4.1 failed to define the primary purpose (see above) but now this clause defines other purposes, including animal welfare which, according to LGAP 1000 Introduction, is the primary purpose! This should also note other purposes such as biosecurity, food safety and product integrity.	Remove reference to welfare and add other examples such as biosecurity, food safety and product integrity.	No change required. This requirement is about the purpose of the system which is traceability, the examples listed are just examples and not an exhaustive list.
4.3	1st sentence	This adds more definition to WHAT is to be done in relation to delivering the primary purpose, but again fails to identify WHY this needs to be done.	"...system shall also, in support of animal welfare:"	No change required. This requirement is about the purpose of the system which is traceability not animal welfare.
4.3 a) ii.	N/A	Specifying 48 hours is unnecessarily prescriptive and a long time. Rather than prescribing a timeframe, a better approach would be to identify that it must be done in a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management.	"ii. within a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management, be:"	Accepted. The timeframe in 4.3 was updated from 48hours to 10 days. Which is consistent with updates made to 4.1. 10days was decided as adequate time to collect, capture and store traceability data given different markets and then perform the traceability exercise.
5.1 b) i. & ii	N/A	This is a good example of an input-focused standard, which is undesirable. It is unclear why the standard needs to address commercial issues such as IP, data and infrastructure ownership or licensing, if data is accessed and the desired outcome is achieved. Rather than including this in a standard, it should be removed and appended as guidance material.	b) terms of use are specified....arrangements for: i. ensuring there is no hinderances or disruption to traceability data access ii. arrangements for how data is..... Append examples as guidance material to the standard.	No change required. The requirement is in place to protect exporters access to systems and traceability data.
6.1	NOTE	Needs to include the concept of risk, i.e. higher risk may require greater resources	"- the inherent risk associated with the supply chain, or part thereof."	Accepted. Replaced 'where the traceability system operates' with "the inherent risk associate with the environment the traceability system operates in"
6.3	All	Noting that 6.2 defines the expected outcome, 6.3 is unnecessarily prescriptive and identifies parameters that may, or may not be relevant. A more appropriate approach would be to identify the need to demonstrate relevant competencies, that training is available, roles and responsibilities have been allocated, ongoing monitoring is in place and management is striving for continuous improvement.	Extend 6.2 to include: "....system by all personnel and users, including demonstration of: - Relevant competencies (including LGAP 1001 Annex A) - Ongoing training - Roles and responsibilities being clearly allocated - Ongoing monitoring to ensure correct operations - Continuous improvement."	No change required. 6.2 relates to processes which Facilities and Operators then need to adhere to. 6.3 relates to the TSPs own internal resourcing. It is not within the TSPs control to ensure the users of the system have the competencies. Many of the aspects in this proposed list are addressed in 1002.

6.4	N/A	This is very input focused and incomplete. It should require that the infrastructure and equipment are installed and maintained to ensure effective traceability and minimum downtime (there must be industry standards for maximum downtime for IT systems?). It also ignores the requirement for effectively trained workers to operate the infrastructure / equipment	"...of the traceability system, including: A) Maximum uptime (>XX% - refer industry stds) B) Contingency arrangements.... C) Sufficient trained staff	No change required. There are no industry standards regarding downtime/uptime maximums to utilise. This is about having a process in place to achieve the outcome.  The TSP cannot be responsible for an Operator or Facility using their system. Instead they are required to provide the process, training and resources to enable the Operator or Facility users to do use the system properly which is then captured in LGAP1002.
6.6 b)	N/A	This is actually defining and allocating responsibilities in relation to the competencies contained in Annex B	" b) identify and allocate responsibilities for fulfilling requirements relevant to the competencies contained in Annex B." Alternatively, combine 6.6 a) and 6.6 b)	No change required. 6.6a is about personnel competency while 6.6b is about allocating responsibility to personnel so they must remain separate.
6.6 b) viii.	N/A	It is unclear what sort of analyses is being referred to in this subclause. Without definition it is worthless.	Delete	Accepted. A note was added to clarify where in the standard to refer to for analysis.
6.6 c)	N/A	This is not an additional requirement. It is already specified in 6.4 (noting comments above). Also, this could actually be a facility responsibility in some countries and does not reflect the 'Node' based model LGAP that underpins LGAP .	Delete	No change required. 6.6 is a different requirement to 6.4. 6.4 relates to all systems while 6.6 relates to only those systems with traceability services so as to ensure only those systems who do these activities have responsibility for those activities. Operators and Facilities then have these responsibilities in 1001/1002 which does reflect the node based model of LGAP.  The committee noted that hyperlinks and guidance will assist in consistent interpretation of the requirements.
6.6 d)	N/A	This does not reflect an alternative option to have backup procedures or a contingency plan in place.	".....back up infrastructure and equipment or backup procedures or contingency plans are readily available...."	No change required. 6.6d) requires the back up equipment is provided in accordance with the process documented in line with 6.4.
7.1 a) i.	N/A	Cannot predict where animals will be in the future. A traceability system can only track an animal up to the present. It is not designed to forecast where it might go.	Remove reference to future i.e. ".....or will be...."	No change required. It is not about forecasting where an animal will go but about knowing the receiving party which the traceability systems should be able to do. For example a consignee and consignor. This is a fundamental part of traceability systems including NLIS/LPA in Australia.
7.1 a) ii.	N/A	This needs to include capturing any change of custody	Add "....custody of those animals, including all parties if those animals change custody while at the traceability location.	No change required. Deliberation occurred on inclusion of change of custody and it was noted that it is unlikely an animal will change physical custody while in one traceability location.
7.1 b) iv.	N/A	This is a fundamental ESCAS requirement and does not need to be repeated here.	Delete	No change required. As this is a fundamental ESCAS requirement it must remain in the standard to be equivalent to ESCAS.
8.1	NOTE 1	Reference to Annex C should be Annex B	Correct error	Accepted and change made.
8.2	All	This is unnecessarily prescriptive and does not add any value in terms of traceability. It is also effectively a repeat of clause 7.	Remove	No change required. 8.2 specifically relates to the identification of an animal, while 7.1 relates to the traceability party identification. The requirements are about two different things and they do not repeat.
8.3	All	This highlights the need to be clear on WHY the standards are being developed – i.e. for animal welfare purposes. Based on this, then food safety issues do not belong in these standards.	Remove	No change required. Food safety was previously considered by Committee and retained. During development of standards it was recognised at a strategic level to include, "hooks" into food safety to foster support in markets which are seeking to improve food safety.
8.4	All	This clause is unnecessarily prescriptive and input focused. The desired outcome is that identifiers are not re-used and removed from the system following slaughter.	Revise clause to reflect unique identifiers are removed from the system following slaughter and never re-used.	No change required. 8.4d) and 8.8 requires that unique identifiers are not re-used.  An ID may require removal other than after slaughter. The requirement applies in all situations that an ID may be removed from an animal (such as becoming dislodged or it stops working). These requirements are based on the complexity of issues exporters face in having C&T adhered to in market. They are also inline with how NLIS AIT Standards Committee has dealt with the complexity of the issue here in Australia.
8.4 d) ii. 1.	N/A	This is not always achievable (owner maybe in another country, etc.) and will often be unverifiable.	Refer previous comment.	No change required. The requirement allows return to the owner OR recycling OR destruction.
8.5 b) i.	N/A	Introduces a new term 'critical movement event' which is undefined. Noting it is subsequently defined in 9.2, it either needs to become a defined term or 9.2 referenced in this clause.	Revise	No change required. The term is already defined in LGAP1000.
8.5 c) iv.	N/A	A traceability location is a physical site. Notifying them of anything is pointless. It is the traceability party that needs to be notified.	Remove reference to traceability location.	No change was required by the Committee
8.6	HEADING	The services described under this heading are often provided by a Facility or Operator, which is in conflict with the definition of Traceability Services in LGAP 1000.	Revise to reflect that these services can be provided by an Operator or Facility	No change required. This only relates to a TSP with Services in place of an Operator or Facility undertaking these activities. If an Operator or Facility undertakes these activities instead then they are handled in LGAP 1001 and LGAP 1002.
8.6 a)	N/A	Refer 8.5 b) i	Revise as per 8.5 b) i. revision, above.	No change required. The term is already defined in LGAP1000.
8.6 b)	N/A	This requirement has never been required and does not contribute to traceability. What is required is identifying that an animal has arrived and/or left a facility.	Define	No change required. 8.6 mirrors the requirements on Operators and Facilities in 1001.
8.7	N/A	This is not an additional requirement, it is addressed at 8.5 c)	Delete	No change required. 8.5 refers to the process, and 8.7 relates to undertaking the process set in 8.5 which is in line with Traceability System Provider who provides traceability services.
8.8 a)	N/A	This is not an additional requirement, it is addressed at 8.5 a)	Delete	No change required. 8.5 refers to the process, and 8.7 relates to undertaking the process set in 8.5 which is in line with Traceability System Provider who provides traceability services.
8.8 c)	N/A	This clause should also include reference to replacing identifiers that do not work. However, it is greatly concerning that removal of tags for any reason is mentioned at all. Any identifier is subject to significant testing to ensure it does not pose a risk and systems, such as NLIS, already have procedures in place to address lost or broken identifiers. Flagging with an overseas operator that you can remove tags is not desirable when we are trying to make sure they adopt rigorous processes.	Delete	8.5 refers to the process, and 8.7 relates to undertaking the process set in 8.5 which is in line with Traceability System Provider who provides traceability services.
9.2 a) i. & 9.2 a) ii. & 9.2 a) iii.	N/A	Introduces a new terms 'master movement event', 'transaction events' and 'critical movement events' which are undefined. Noting they are subsequently defined in 9.2 Table 1, they either need to become a defined terms or 9.2 Table 1 referenced in these clauses. Also, it is unclear why there is a need for different levels of events. It would make more sense to have 'events' that include (but may not be limited to) the types of events listed in Table 1. This way, the focus will be on the fact that an event has occurred, rather than debating the level of the event.	Revise and simplify to reduce complexity.	No change required. Terms are defined in LGAP1000.
9.2 a) iii. 2. & NOTE	Clause and Note	Capturing traceability data in relation to animals being moved within a traceability location, i.e. from one pen to another, is totally impractical and impossible to deliver. The resources required to address this will be prohibitive and for what benefit? What risks will be addressed by monitoring this? It will not add any value to traceability. No other traceability system in the world requires this.	Remove	Accepted. Removed 9.2a)iii2 and the reference to this in LGAP1001. No requirement to capture movement of animals around a traceability location.
9.2 b) ii. 2.	Table 1	It makes no sense to bury this Table in the middle of the Standard, especially when its contents are referred to earlier in the document.	Move to further up the document prior to where terms in it are referred to and copy to Definitions in LGAP 1000	No change required. Terms are defined in LGAP1000.
9.2 b) ii. 2.	Table 1	This table exemplifies a lack of empathy with industry. If industry is expected to understand and implement these standards, it would be useful to adopt terms that are currently used by industry rather than introducing new terminology. For example: emergency destruction = emergency slaughter Death = mortality Death – natural causes = mortality ship or mortality feedlot	Engage industry to understand common terms	Partially accepted. Added example to the table header to make it clear the status's in the table are just an example and not a requirement.
9.2 b) ii. 2.	Table 1	There is no reason to include Birth in the traceability system. We are interested in the cow if she leaves the supply chain, but have no interest in the offspring in terms of ESCAS.	Remove BT Birth	Partially accepted. Added example to the table header to make it clear the status's in the table are just an example and not a requirement.
9.2 b) ii. 2.	Table 1	Master level event refers to 'Arrival'. What does this mean and how does it differ from 'entering the traceability location' under critical movement event?	Better define	Partially accepted. Added example to the table header to make it clear the status's in the table are just an example and not a requirement.
9.2 b) ii. 2.	Table 1	Refer to first comment, above. The references to different categories of events (i.e. Master level, Transaction and critical movement) should be removed as they do not add value and could become a distraction	Remove event categories	Partially accepted. Added example to the table header to make it clear the status's in the table are just an example and not a requirement.
9.3 a) & b)	N/A	It is unclear what 'immediately after' means. This should reflect that it should be captured at the time of the event. This simplifies the requirement without detracting from it.	Revise to: "Traceability data shall be captured at the time of the event."	No change required. The committee deliberation was that immediately after is required for instances that the information is not captured as the event occurs. The timeframes in 4.1 refer to tracing an animal not capturing, collecting and storing the traceability data on the register.
10.2 a) i.	N/A	Specifying 60 hours is unnecessarily prescriptive, indefensible (why 60? Why not 24 hrs or 5 working days?) and may not meet expectations. Data on the Register will be required for future reference and for audit, which may happen 6 months later. Therefore, why be so prescriptive? Rather than prescribing a timeframe, a better approach would be to identify that it must be done in a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management. This is also inconsistent with 10.6 b) which requires that traceability data is stored on the Register as soon as it is received.	"i. within a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management."	Accepted. The overall goal of the system is to trace an animal in 10days and the collection and storage of the traceability data must now allow for that goal to be met. 9.3 refers to when the data must be captured not when it is stored on the register.
10.2 c) ii.	N/A	This is a repeat of 10.2 b)	Delete	No change required. 10.2b) is about secure transmission methods and 10.2c) ii is about the format of the information itself.

10.3	N/A	The term 'authorised traceability party' is undefined. What is the difference between an authorised and unauthorised party?	Remove reference to 'authorised' or define.	Accepted. Authorised was removed from the requirement.
10.4 a) i.	N/A	Specifying 24 hours is unnecessarily prescriptive, indefensible (why 24? Why not 60 hrs or 5 working days?) and may not meet expectations. The requirement for data could vary depending on risk. The ability to provide data could also be impacted by issues such as how busy a facility is (religious festivals can result in extremely high throughputs), sick staff, etc. The data may not be needed until some week or months into the future. Therefore, why be so prescriptive? Rather than prescribing a timeframe, a better approach would be to identify that it must be done in a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management.	"i. a timeframe that allows for effective traceability, meets regulatory requirements and demonstrates responsible management."	Accepted. The overall goal of the system was updated to be able to trace an animal in 10 days and the provision of data to or from traceability parties now requires the achievement of that goal.
10.4 c) ii.	N/A	This is a repeat of 10.4 b)	Delete	No change required. 10.4b refers to the data transmission being secure and 10.4c ii refers to the format of the data being secure.
10.4 c) ii.	NOTE	There should not be any reference to amending or correcting data. This could be interpreted as authorisation to change data for any reason.	Remove reference to amending and correcting data	No change required. This requirement allows for the occurrence of error (human or otherwise) and only for legitimate reasons. Without an allowance for errors, any mistakes in the data would be a nonconformity if it was fixed.
10.5	N/A	This is not an additional requirement. It is saying that the provider must do what is specified in the general requirements for providers, above.	Delete	No change required. One ensures processes are in place, the other ensures those processes are followed where they have to be. This would only apply if the TSP provides services, if they did not they would not be responsible for these activities rather the Operators and Facilities would be and their requirements are contained in 1001 and 1002.
10.8	N/A	There should not be any reference to correcting data. This could be interpreted as authorisation to change data for any reason.	Remove reference to correcting data	No change required. This requirement allows for the occurrence of error (human or otherwise) and only for legitimate reasons. Without an allowance for errors, any mistakes in the data would be a nonconformity if it was fixed.
11.1 d) ii.	N/A	Greater clarity is required regarding what the Program Owner might prescribe. Having such an open sweeping catch-all statement like this is not helpful and could result in significant imposts being put on industry without recourse.	Provide further description of what is anticipated by this statement and include examples.	Partially accepted. Updated 11.1d)ii to "may be prescribed by the Program Owner."
11.1 e) ii.	N/A	Noting this is a capitalised term, it should be in the definitions and is not. Either way, it requires definition	Define	No change required. Approved Auditors and Program Owner are defined in the LGAP Certification Rules as the names of parties in LGAP. The definitions in the Rules will be moved over to LGAP1000.
11.2 a) ii.	New	This list needs to include to include the group identification code (such as PIC, etc.)	8. Group identification code.	No change required. A PIC is unique to Australia, the type of physical group identifier captures the intent in a less restrictive manner. There is no restriction on using the PIC but it's not a minimum requirement.
11.3	N/A	It is not always possible to capture the metadata, depending on the method of transmission from overseas. If specific metadata is required, then it should be specified so that systems can make sure it is captured.	Delete or define to ensure it is captured.	Committee noted the comment and it was noted that the requirement was more about if you capture the metadata not destroy it rather than prescribing what metadata is required.
11.4 a) i. & ii.	N/A	It is unclear what 'immediately afterwards' means. It would be much clearer to identify as being captured at the time of the event.	Combine to say: "i. at the time of the event"	No change required. The committee deliberation was that immediately after is required for instances that the information is not captured as the event occurs. The timeframes in 4.1 refer to tracing an animal not capturing, collecting and storing the traceability data on the register.
11.4 a) iii.	N/A	There is no justification for this level of prescription. The desirable outcome is defined in 11.4 b), below.	Delete	No change required. This requirement directly relates to a recommendation in the MRAG report which is the basis of the standard. The deliberation was that the pixel requirements are minimum and could be expected to be met in all instances.
11.4 c) i.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"i. GPS location (or suitable alternative if unavailable) where static....."	Accepted. One of the challenges under ESCAS is verifying the images are really the image they're being portrayed to be. MRAG, exporters and the Department identified this as something which needs to be addressed in C&T. This is also consistent with MRAG/ALEC recommendations and was considered a fairly fundamental requirement from parties consulted. A revision to the requirement has been made to allow for an alternative to GPS.
11.4 d) i. 3.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"i. GPS location (or suitable alternative if unavailable)"	Accepted, new requirement added for allow for alternative to GPS.
11.4 d) ii.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"ii. GPS location (or suitable alternative if unavailable)"	Accepted, new requirement added for allow for alternative to GPS.
11.4 d) ii. 1.	N/A	This might not always be possible as some images may be taken with a worker's own phone, etc.	"1. Marked on or connected with....."	Accepted, new requirement added for allow for alternative to GPS.
11.5 c)	N/A	Also, actually marking a video might not always be possible.	"c) Marked with or connected to the:	Accepted, new requirement added for allow for alternative to GPS.
11.5 c) i.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"i. GPS location (or suitable alternative if unavailable) where the....."	Accepted, new requirement added for allow for alternative to GPS.
11.5 d) i. 3.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"3. GPS location (or suitable alternative if unavailable)"	Accepted, new requirement added for allow for alternative to GPS.
11.5 d) ii.	N/A	Technology used does not always allow for the GPS to be captured. Therefore, this requires an additional requirement for a backup system if GPS cannot be captured.	"ii. GPS location (or suitable alternative if unavailable)"	Accepted, new requirement added for allow for alternative to GPS.
11.5 d) ii.	N/A	This might not always be possible	"1. Marked on or connected to..."	Accepted, new requirement added for allow for alternative to GPS.