

Exporter Supply Chain Assurance System Audit Guidance

Introduction

Australian livestock exporters are required to ensure that new and existing supply chains in importing countries receiving Australian feeder / slaughter livestock are approved under the Exporter Supply Chain Assurance System (ESCAS) and maintain animal welfare according to World Organisation for Animal Health (OIE) recommendations. This must be verified through independent audits.

This paper contains information to assist livestock exporters and auditors to conduct audits of supply chains approved under ESCAS and provides the ESCAS animal welfare standards and recommended templates for the audit and summary report.

1. ESCAS Audit Procedure

1.1. Audit documentation

There are three key documents available in relation to completing an ESCAS audit, which are the:

- **ESCAS animal welfare standards**
- **ESCAS animal welfare audit form** – multiple copies may be required depending on the number of elements being audited during a particular audit period
- **ESCAS audit summary report.**

These documents, developed in close consultation between industry and the Australian Government Department of Agriculture and Water Resources (the department), replace the previous standards, audit guidance and checklists for cattle, buffalo, sheep and goats provided on the department website.

1.2. ESCAS Animal Welfare Standards

The ESCAS animal welfare standards (the standard) set out the requirements that must be met in relation to the welfare and handling of cattle, buffalo, sheep and goats in ESCAS supply chains / facilities that receive Australian livestock for feeder/slaughter purposes. The standard is derived from the animal welfare recommendations of the OIE Terrestrial Animal Health Code 2014 and as such, compliance with the standard ensures fulfilment of the OIE Code's animal welfare recommendations.

To support effective verification, the standard includes additional interpretation of the OIE Code, including methodology for the measurement of welfare during handling, restraint, stunning and slaughter. Numeric scoring criteria for slips, falls, baulking, vocalisation (for handling) and stunning effectiveness were developed by Temple Grandin with input from independent reviewers, as part of the American Meat Institute Federation (AMIF) audits.

The standard should be carried and used as a reference document during the audit and is arranged as follows:

Title	Standard	ESCAS element	Evidence of compliance	Auditor notes
Explanation	The requirements that must be met. There are 29 individual standards.	Details which requirements must be audited for each part of the supply chain - the 'X' identifies the supply chain elements to which the standard is relevant.	Evidence that can be used by the auditor to verify compliance with the requirement. This is not an exhaustive list and auditors may identify other ways of verifying compliance.	Specific guidance and definitions relating to each requirement.

1.3. ESCAS animal welfare audit form

The ESCAS animal welfare audit form (the audit form) is designed to be used during the audit to record observations, information and data. These records need to provide sufficient objective evidence to confirm compliance or non-compliance with the relevant requirements of the standard.

The audit form applies to all types of facilities and supply chain elements, with one document being completed for each supply chain element being audited. However, where supply chain elements are linked, for example lairage and slaughter, one audit form can be completed to cover both.

The audit form is arranged as follows:

Title	Standard	Observations	Summary
Explanation	The individual standards that must be audited. Not all individual standards are relevant to all elements. The standard document and column 2 of the audit form identify the relevant elements.	Record observations / comments during the audit and identify where the audit has occurred (the listed elements are those for which the standard is relevant). For some standards, a record of the number of animals observed must be completed. This is shown as a blank table, which should be completed using the key provided.	Summarises the compliance or non-compliance of the element against the standard.

1.4. ESCAS audit summary report

The ESCAS audit summary report (the summary report) is prepared by the auditor and provided to the department by the exporter. The summary report is designed to clearly indicate to the department whether the facility / supply chain element met the animal welfare requirements under the standard and must also include a summary of performance with regard to the traceability and control processes and whether these satisfy the requirements under ESCAS detailed in the regulatory framework.

The traceability and control summary needs to focus on whether appropriate records are being kept, managed, and verified and whether there is any evidence to suggest Australian livestock have left the approved facility / supply chain during the audit period and cannot be accounted for.

The summary report can include qualifying statements regarding the effect that individual non-compliance had on the overall process (for example, frequency of occurrence and the resulting impact on welfare). Details of observations which deviate from normal practice, but do not constitute non-compliance can also be recorded.

1.5. Audit scope

The requirements under the standard that must be audited vary between supply chain elements. The following table summarises the standards that must be verified for each supply chain element:

Element	Standards to be audited
Land transport (including discharge)	1, 2, 3, 4, 5, 7, 8, 9, 10, 13, 29
Feedlot/holding	1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 29
Lairage	1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 29
Slaughter (Stun)	1, 2, 3, 5, 6, 8, 10, 15, 16, 17, 18, 19, 20, 21, 23, 26, 27, 28, 29
Slaughter (no stun)	1, 2, 3, 5, 6, 8, 10, 15, 16, (18), (19), 21, 22, 24, 25, 26, 27, 28, 29

In order to meet ESCAS requirements and the recommendations of the OIE Code, all of the requirements listed for each element above must be audited. If this is not the case, the reasons for omitting a standard should be provided in the summary report.

The frequency of audits for supply chain elements is determined according to a schedule determined by the department.

1.6. Scoring performance

Where scoring of performance is required under the standard (standards 1, 15 and 20), a table is provided in the 'observations' column of the audit form.

The numbers of animals that should be observed when scoring performance against these standards should be determined based on the abattoir's average daily slaughter and are provided in the table below.

Average daily slaughter (head)	< 5	6 - 20	> 20
Audit sample size (head)	2	3	10% or 3 animals, whichever is greater

To demonstrate repeatable compliance with the standard, a **minimum of two animals** must be observed slaughtered during all audits.

Both the average daily slaughter and the maximum daily capacity (e.g. during festival periods such as Eid al-Adha, Korban, Tet) should be provided in the audit summary and template. These must reflect the capacity for **ESCAS approved lines only**.

For audits of land transport and discharge, 50 per cent of vehicles used in 30 minutes of a loading/unloading/disembarkation period should be observed when scoring performance against Standard 1 (animal handling and movement). Auditing loading and unloading in small abattoirs and feedlots may be difficult due to the small numbers of livestock arriving or leaving on a particular day. It may not be practical or economical for the auditor to assess more than one vehicle, therefore they must aim to arrange the audit when vehicles are planned to arrive or depart.

- Any deviation from the above sampling sizes should be noted on the summary report **and an explanation provided**.
- Scoring should be written by using round numbers as opposed to decimal points.
- If the auditor finds that performance against a target is not acceptable on the day of the audit, then there should be management intervention to alleviate the problem. The auditor must look for evidence of corrective action and this evidence (or lack of) must be recorded on the audit form and summary report.

1.7. Audit process guidance

Using the standard and auditor judgment

- The standard includes evidence that can be used to verify compliance, however this is not an exhaustive list and auditors may identify other ways to verify compliance.
- While the auditor should use the information contained in the standard as evidence of good animal welfare outcomes, there may be situations where the auditor needs to use judgment to weigh up relative animal welfare outcomes from alternative actions (such as the strict application of the standards versus an alternative more humane action). For example, in some situations removing livestock from restraint may have a greater negative welfare impact than leaving them restrained during delays. The audit form would be an appropriate place to note the rationale for the decision.
- Where the auditor considers non-compliance has been identified, where feasible, further advice or agreement should be sought on the accuracy of the situation from a second party, such as from the audit escort.

Standard Operating Procedures (SOPs)

- When conducting an audit, it is expected that the auditor will review the SOPs for each supply chain element and either observe delivery against the SOP or ask staff about their familiarity with / access to the SOPs and how they are implemented. This must be the approach taken where a particular procedure covered by the standard, for example animal inspection, is not witnessed on the day of the audit.

Slaughter and stunning equipment

- The standards for stunning and slaughter equipment include animal welfare parameters that require measurement. These measurements are provided for indication only and calibration of equipment is not

required. Measurements (e.g. timings) should be made using the client’s equipment, either under supervision or by the auditor.

- Wherever possible, manufacturer’s specifications should be available for stunning and restraint equipment. Where this is not available, management should be able to explain to the auditor how it ensures that the parameters used are appropriate for the animals being processed.
- Electrical stunning equipment must have valid calibration (can be in-house) and records must be available for verification.
- Auditors must visually assess the effectiveness of stunning between application of the stun and slaughter. Animals must also be assessed for signs of recovery during the bleeding period.

Species specific differences

- There may be variation in the scope of the audit in relation to the different species. Some of the differences that an auditor may encounter are summarised in the table below:

Species	Summary of the different requirements
Cattle	<ul style="list-style-type: none"> • Vocalisation can be used as an indicator of stress • Minimum electrical stunning current - 1.5A
Buffalo	<ul style="list-style-type: none"> • Vocalisation should not be used as an indicator of stress • Non-penetrating captive bolt stunning must not be used
Sheep and goats	<ul style="list-style-type: none"> • Vocalisation should not be used as an indicator of stress • Minimum electrical stunning current - 1.0A • Can be manually lifted if they cannot walk or stand, providing this does not cause further pain or distress • Electric goads must not be used

Initial audits of new supply chains

- In many instances, it will not be possible for the auditor to observe the physical discharge and land transport of Australian animals during the initial audit of a new supply chain. In these circumstances the auditor must review the SOPs and relevant infrastructure to verify they meet the requirements of the standard. Infrastructure that could be considered includes the design, steepness and flooring (e.g. likelihood of slippage) of ramps.
- Alternatively, auditors may observe other livestock, provided they are of a similar size and class to the livestock that will be discharged and transported under ESCAS arrangements. This information must be recorded on the summary report.
- For initial audits of feedlots, lairage and slaughter (stun and no stun), livestock of a similar size and class to those being approved for the supply chain must be present.

1.8. References

1. OIE Terrestrial Animal Health Code, 2014 (<http://www.oie.int/international-standard-setting/terrestrial-code/access-online/>)
2. Grandin, T. (1998a) Objective scoring of animal handling and stunning practices at slaughter plants. Journal of American Veterinary Medical Association, 212, 36-39
3. Grandin, T. (1998b) The feasibility of using vocalization scoring as an indicator of poor welfare during slaughter. Applied Animal Behaviour Science, 56:121-128
4. Grandin, T. Auditing and scoring of vocalization of cattle and pigs at slaughter plants as an indicator of poor practices that are detrimental to animal welfare (<http://www.grandin.com/auditing.scoring.poor.practices.html>)
5. Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals, The EFSA Journal (2004), 45, 1-29 (<http://www.efsa.europa.eu/en/scdocs/doc/45.pdf>)
6. Australian Standards for the Export of Livestock (Version 2.3) 2011 (<http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant/animal-welfare/standards/version2-3/australian-standards-v2.3.pdf>)