

# Final report

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## Livestock Production Assurance (LPA) Program Rules Update

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## **Abstract**

Schuster Consulting Group was engaged to review the Livestock Production Assurance (LPA) Program Rules and, through consultation with Integrity Systems Company (ISC) and key industry and government stakeholders, made necessary changes to deliver a modernised version of the LPA Program Rules which enhances, streamlines, and clarifies the administration of the LPA Program and makes provisions for the initiatives outlined in the LPA Future State Roadmap.

## **Executive summary**

Schuster Consulting Group was engaged to review the Livestock Production Assurance (LPA) Program Rules and, through consultation with Integrity Systems Company (ISC) and key industry and government stakeholders, made necessary changes to deliver a modernised version of the LPA Program Rules which enhances, streamlines, and clarifies the administration of the LPA Program and makes provisions for the initiatives outlined in the LPA Future State Roadmap.

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## 1. Background and objective

Schuster Consulting Group was engaged to review the Livestock Production Assurance (LPA) Program Rules and make necessary changes to deliver a modernised version of the LPA Program Rules which enhances, streamlines, and clarifies the administration of the LPA Program and makes provisions for the initiatives outlined in the LPA Future State Roadmap.

## 2. Methodology

The following process was undertaken:

1. Consultation occurred with Integrity Systems Company (ISC), the LPA Database Service Provider as well as other stakeholders including relevant government and industry parties and the LPA Audit Provider to:
  - a. understand the current processes, future state requirements, and identify current gaps in the Rules; and
  - b. determine with ISC any new requirements to be included in the Rules to address consultation findings.
2. The current LPA Program Rules were reviewed with respect to:
  - a. expanding the scope of the program to support changing industry and market needs (e.g. HGP use/evolving EUCAS requirements/emerging disease threats);
  - b. extending the program to underpin additional declarations through the eNVD platform and the mechanisms for verifying additional claims;
  - c. enhancing, streamlining, clarifying, and improving:
    - i. definitions, ensuring they are consistent with industry, government and ISC norms;
    - ii. roles and responsibilities of all LPA program participants, including auditor competency requirements, relevant government agencies and conflict of interest requirements;
    - iii. accreditation and re-accreditation processes, including the addition of a self-assessment process;
    - iv. requirements of LPA accreditation as it relates to access and use of LPA NVD's, eNVD's and the NLIS;
    - v. audit process, including onsite and remote;
    - vi. nonconformity management framework - including the identification, categorisation, escalation and closing of nonconformities;
    - vii. residue detection and management processes;
    - viii. animal welfare incident detection and management processes;
    - ix. notification processes of nonconformities to ISC, by parties to a consignment;

- x. suspensions, withdrawals and appeals;
  - xi. program review, communications and complaints; and
  - xii. confidentiality, acceptable use of ISC's systems, data sharing, third party authorisations, legal requirements.
3. Draft Rules were produced for consideration by ISC that:
- a. addressed agreed gaps and the future state requirements identified during consultation;
  - b. contained provision for the expanded use of the eNVD platform to communicate additional livestock attributes through the supply chain.
  - c. addressed the results of the review undertaken in step 2 that enhance, streamline, and improve administration of the LPA Program;
  - d. considered industry best practice relating to conformity assessment programs and the practical application of the Rules in line with the number of program participants;
  - e. proposed prescribed timeframes for processes where relevant;
  - f. included diagrams depicting the processes for accreditation, re-accreditation, audit, nonconformity management, suspension, withdrawal, and appeal; and
  - g. utilised LPA branding.

In addition, consultation with key stakeholders on the draft Rules was undertaken as well as a review by MLA's legal advisor.

## 4. Results

The LPA Rules (v1.21, 12/09/2020) were reviewed and a more contemporary structure and style applied. The drafted LPA Rules were provided to a range of stakeholders and their feedback was considered and the LPA Rules finalised.

The following major changes were made to the 2020 version of the Rules:

- stipulations added in relation to:
  - which parties can be authorised and how parties are authorised including third party authorisation;
  - acceptable use of the LPA Service Centre and eNVD and mobile app;
  - what data can be shared with whom, in what circumstances and for what purposes;
  - how other auditable programs can be recognized under LPA;
  - other susceptible foot and mouth disease species under LPA;
  - streamline the registration, accreditation process and self-assessment requirements;

- introducing flexibility into the Rules to allow optional modules to be included (examples provided);
- timeframes for application of reaccreditation following withdrawal;
- the ability for LPA Administration to charge fees for reaccreditation following withdrawal;
- minimum auditor competency requirements; and
- conflict of interest provisions.
- improvements made in relation to:
  - definitions and terms used, including changes to terms used for different parties;
  - the process and distinction for identification of nonconformities in different circumstances;
  - the nonconformity management process including how Nonconformities, Show Cause, Suspension, and Withdrawals are escalated and applied;
  - relevant oversight mechanisms for reinstatement of accreditation after withdrawal;
  - ability for LPA Administration to conduct audits or investigations or require provision of documented information at any time;
  - ability for LPA Administration to improve collection of additional data at registration, accreditation/re-accreditation;
  - greater flexibility in the type of evaluation activities that can be undertaken as well as the frequency;
  - including the National Feedlot Assurance Scheme (NFAS) being eligible for LPA accreditation; and
  - removal of the 1 July 2009 timeframe relating to replacement NVDs.

The drafted LPA Rules required an overall legal review but in particular the following were identified as requiring a targeted legal review:

- Use of information
- LPA Privacy statement
- Indemnity and limitation of liability
- Copyright statement

The legal review identified a number of changes to the above as well as to terms and definitions, certification body requirements and other integrity programs which were adopted.

A number of components of the Rules represented requirements that were more applicable to the LPA Standards, these related to:

- Introduced livestock
- HGP Declarations
- Alternate Feedstuff

These were removed and it is recommended they be included in the Standards, refer Appendix 1.

Workflow diagrams depicting the process flow for the following were also delivered under the project:

- Application, accreditation and reaccreditation process
- LPA audit process
- LPA Desktop Review process
- LPA nonconformity management process
- Notice of Concern process



## **Appendix 1: Items removed from LPA Rules to be included in LPA Standards**

### **Introduced Livestock**

Accredited Producers shall ensure that:

1. all Livestock introduced onto the Accredited PIC are accompanied by an accurately completed NVD and are sourced from an Accredited Producer;
2. the NLIS database is updated for all Livestock introduced onto the Accredited PIC in accordance with statutory requirements; and
3. in relation to Cattle sourced from an Accredited PIC with a designated Extended Residue Program (ERP) status ('T' Status) as notified by a State or Territory authority that:
  - i. such Cattle are separately identified and sufficient records are maintained to enable traceability at all times; and
  - ii. a separate NVD and declaration is used where such Cattle are moved from the Accredited PIC within six months of introduction.

### **Dispatched Livestock**

Accredited Producers shall ensure that an accurately completed NVD accompanies all movements of Livestock from an Accredited PIC to any other destination.

### **HGP declarations**

Accredited Producers using HGPs in Livestock shall ensure that:

- a) the ordering, purchase and application of HGPs is in accordance with statutory requirements;
- b) all Livestock that are treated with HGPs are permanently identified by a triangular ear punch and are traceable; and
- c) full records of the ordering, purchase and use of HGPs are maintained.

### **Alternate Feedstuff**

Accredited Producers acquiring Alternate Feedstuff shall ensure that the use of Alternate Feedstuff is in accordance with the requirements set out (see below).

## Alternate Feedstuff

- Alternate Feedstuff for the purposes of the LPA Program means feedstuff as defined in this Annex.
- From time to time, the Committee may recognise Alternate Feedstuff at its discretion to facilitate market access requirements of the Industry.
- Current Alternate Feedstuff recognised by the Committee and the requirements for the use of Alternate Feedstuff are prescribed in the table below:

Alternate Feedstuff	Requirements for use
Cotton trash	<ul style="list-style-type: none"> <li>a) prior to each despatch of cotton trash from the supplying gin or cotton trash storage, an <i>Alternate Feedstuff (Cotton Trash) Declaration</i> is completed by the Accredited Producer and provided to LPA Administration within 7 days of signing;</li> <li>b) a completed 'By-product Vendor Declaration' or equivalent delivery documentation is sourced from the supplying gin for the cotton trash;</li> <li>c) Livestock that have had, or may have had, access to cotton trash are grazed on clean feed for 60 days (<b>Clean Feed Period</b>) prior to dispatch for slaughter;</li> <li>d) movements of any Livestock from the Property within the Clean Feed Period are registered on the NLIS database by the Accredited Producer within 1 day;</li> <li>e) Livestock moving to another PIC prior to the completion of the Clean Feed Period are declared on the LPA NVD;</li> <li>f) the commencement of the Clean Feed Period is verified by an Authorised Auditor and is arranged by the Accredited Producer at the Accredited Producers' own cost;</li> <li>g) written verification is provided to LPA Administration of the commencement of the Clean Feed Period and a list of the devices attached to Livestock that have been verified to be grazing on clean feed;</li> <li>h) a management plan is in place to ensure the production system prevents access to cotton trash for the Clean Feed Period; and</li> <li>i) signed <i>Alternate Feedstuff (Cotton Trash) Declarations</i> are retained for a minimum of three years.</li> </ul>