

# Leather Impact Accelerator (LIA) V1.0 Feedback Summary

Published September 1, 2023

## Section A – Introduction

Textile Exchange is committed to building credible, internationally recognized standards that include systems for assurance, monitoring, and evaluation. As a member of ISEAL, Textile Exchange follows the Codes of Good Practice as well as its procedures for Standard Setting, Accreditation, Certification, and Benchmarking.

The Leather Impact Accelerator (LIA) is a framework that sets existing industry tools into a coherent package and enables leather supply chain members – from farmers to retailers – to contribute to a more responsible leather supply chain. LIA uses benchmarks and protocols to set a minimum threshold for practices at the farm and leather production levels and gives recognition to those who meet or exceed them. Brands can use Impact Incentives to provide direct financial support to producers that meet LIA requirements or are working towards meeting them through an Impact Partnership.

This document has been prepared to provide a summary of the comments received during the Public Stakeholder Review of the Leather Impact Accelerator. It includes a summary of all comments received related to the revision, the general response to the feedback, and how the issues were addressed. A full list of all comments received is available upon request.

### A1. Open Feedback Period:

The revision process included two public consultation periods. The first public consultation was from May 4 – June 15, 2022, and open feedback on all the documents considered in the LIA revision. The second public consultation was on the LIA document 1.0 drafts approved by IWG. The feedback summarized below is from the first open consultation.

### A2. Participation

Feedback in the open consultation period was received from NGOs, standard owners, brands, and representatives of the leather and cattle industries to ensure the relevance of the revisions made to LIA. We had engagement with many more stakeholders involved in the LIA development and revision, including the LIA International Working Group (30).

Total number of open consultation stakeholders: 8

- Brands/Retailers: 1
- Civil Society: 2
- Professional Services: 1
- Standard Owners: 2
- Cattle Production Level: 2

## Section B – Summary of Comments

### Bl. Deforestation/Conversion-Free (DCF) Protocol

- **Proposed change for A1.1:** Only farms that meet the definitions of zero illegal gross deforestation or conversion shall be accepted.  
**Comment:** The change in the text allows rural properties that have carried out area conversion or deforestation in accordance with the legislation to be accepted.
- **Proposed change for A1.2:** Recommend including parenthetical example(s) for these two phrases.  
**Comment:** The terms are a little unclear, particularly in terms of whether they are referring to similar or distinct impacts.

The area limit for minimum deforestation or conversion is 5% of the total property size or less, and no more than 20 hectares (whichever is stricter).

**Comment:** Conversion can take place if the producer restores the same number of hectares converted into areas with environmental gains (for example, in biological corridors). If the areas mentioned above are not available for restoration, the producer must restore 20% more hectares than the originally converted area, in a suitable region.

Question/point for consideration: are there any reliable and established monitoring tools that have an identification limit that LIA would consider too high to be considered DCF?

**Comment:** Consideration of this question may not require protocol text change, but wanted to flag as being worth checking and validating.

- **Proposed change for A1.3:** Replace Jan 1, 2020, with December 31, 2020 as a cut-off date to align with proposed EU cut-off date of 31 Dec 2020.  
**Comment:** Agreed

Who are the verifiers; what criteria are set for them to check that cut-off dates are being adhered to; what evidence is accepted; and does this vary between regions?

**Comment:** This information will be in the verification manual and will be a public document.

Suggest including reference to Brazilian Cerrado & Paraguayan Gran Chaco as key areas and relevance to defined cut-off dates.

**Comment:** Language suggestion: 'Where an earlier cut-off date exists, compliance with the requirements of that cut-off date needs to be verified.'

- **Proposed change for B1.1:** Add Face ID.

**Comment:** It is up and coming as the new wave of identification technology (in Brazil, especially).

**Pilot learning:** Individual animal tracing is not possible in many regions, allow for batch-level tracing. Include language that sets goals at IP.

Insert a space for filling-in under technological tracking systems.

**Comment:** We suggest adding a space here not just for checking a box – but for writing in what kind of technological tracking systems. This level of granularity is key.

Again, 'which farms is this applicable to' scope needs a clear definition. Are both identification and tracking required, or is there an option of either? Presume both are a requirement to ensure robust approach.

**Comment:** Review wording: no individual animal identification is needed in this version of the protocol.

- **Proposed change general:** Are LIA requirements relevant only to cow/calf farms or applicable to all farms within supply chain? Would suggest explaining the specifics for most stages and how these apply in terms of direct and indirect suppliers.

## B2. Animal Welfare Standards Benchmark

- **Proposed change for A1:** How has it been determined that only grass-based systems can be attributed to the highest level of welfare?

**Comment:** This is the conclusion of the original AW expert committee, which included research.

- **Proposed change for B1.1:** Option 3 is the option that defines pasture-based production in terms of access to grazing throughout the life of the animal. However, this specific requirement goes further than animal welfare. B1.1 B already covers the welfare requirements for forage feeding: the standard shall require that forage content in the daily diet is suitable and sufficient to avoid negative outcomes such as acidosis.

Feeding by-products does not have a negative impact on cattle welfare. No ruminant animal by-products are included in cattle rations in the U.S. due to our ruminant protein ban.

**Comment:** The standard shall require that no ruminant by-products are included in cattle rations.

- **Proposed change for C1.7:** These two requirements are currently flagged as "indoor environment," but they should apply anywhere that cattle are held in pens – indoors in barns or outdoors in feedlots.

This is very prescriptive, and while some certifications meet this for some sizes/weights of cattle, they do not always meet this for all types/weights of animal. It is not clear what justification there is that 1m<sup>2</sup> per 100Kg is the most appropriate welfare requirement.

Space allowance not specified and varies based on type and weight.

- **Proposed change for C1.8:** This should become an Option 1 requirement (if the suggestion that the number of levels of the AW benchmark is reduced to 3 is taken up, this will happen by default).
- **Proposed change for C1.10:** Adjust this to cover situations when dust is a risk. Feedback from standards that if they define a pasture-based system, they would not include requirements about dust as this is not then a risk.
- **Proposed change for C1.12:** Need to clarify the difference between an outdoor exercise area and pasture in appendix or glossary.
- **Proposed change for C1.13:** Shade or shelter is not provided for a large number of cattle fed in the U.S. This should be an option rather than a baseline if baselines are considered to be meeting the basic requirements for animal welfare.  
**Comment:** The standard shall require that strategies such as providing bedding and putting up windbreaks are employed to protect cattle from extremes of temperature and weather.
- **Proposed change for C1.14:** This could be expanded to recommend protocols for regenerative land management (to align with Climate+ goals). Otherwise, feedback is that managing cattle is generally covered within protocols for inspection and health planning as well as nutrition management, and that if this is a requirement for land management, planning it is outside an AW scope.
- **Proposed change for C1.15:** Reframe this requirement to situations where there is a risk of/potential for animals being tethered. Some certifications do not cover this topic as there is no risk in the regions/systems they cover. This is more a dairy cattle concern.
- **Proposed change for C1.17:** Reframe to cover times when cattle are handled, as this is the highest risk, OR delete and cover this within the requirements for calm handling. General noise concerns (outside of handling) are more commonly found as a welfare risk in intensive pig/poultry systems.
- **Proposed change for C1.18:** This requirement is needed in feedlots where the environment can otherwise be quite barren, but pasture-based certifications may not mandate this, as

cattle have access to items in the natural environment to scratch on, such as trees, rocks, etc. Reword to this effect.

- **Proposed change for C1.19:** Many animals are housed on dirt. Dirt can constitute a dry place to lay and should be removed from this option. “Deep” should be specified with a specific measurement, such as above the knees of the animal.

**Comment:** The standard shall require that cattle are not forced to lie in mud/manure or to stand/walk in deep mud/manure above the knees of the animal.

Move to Baseline as per recommendation C2.3 as part of reframing to three levels in the benchmark. It is a basic requirement that is met by the standards benchmarked so far.

- **Proposed change for C1.21:** Ways to limit predation of cattle are often based on pasture rotation and using guard animals. Changing this option to state that strategies are employed to protect animals from predators would be more appropriate than saying that they are protected.

**Comment:** The standard shall require that strategies are employed to protect animals from predators.

- **Proposed change for C1.25:** Replace "is lethal" with "if lethal"

**Comments:** This appears to be a typo/grammatical error

- **Proposed change for C1.26:** The preceding requirements to C1.21 to C1.25 are the important outcomes. If these are met, is a plan really necessary as well?

- **Proposed change for C2.1:** This could be added as a requirement at the level above baseline. It is an improved practice for cattle going into feedlots.

- **Proposed change for C2.2:** Dirt should be removed from this baseline.

**Comment:** The standard shall require that a mud scoring system is used. "

- **Proposed change for D1.7:** Comment from benchmarked certifications that even with the best handling facilities and trained stock people cattle can sometimes be dangerous to handle and can harm other cattle or people. Emergency use of electric prods is therefore requested to be permitted. Noted also that these issues are more pronounced for extensively reared cattle that may not see humans at close quarters except when being (infrequently) handled. This requirement could stop a certification reaching Option 3 in the benchmark.

Although it is understood that this section includes prescriptions for when prods can be used, it could be problematic considering the use of prods is unacceptable from a welfare perspective even at the baseline level.

- **Proposed change for D1.12:** This should become an Option 1 requirement (if the suggestion that the number of levels of the AW benchmark are reduced to 3 is taken up, this will happen by default). Consideration should also be made as to whether this should be a baseline

requirement – most certifications include this as a basic requirement for animal health and welfare.

- **Proposed change for D1.13:** Severely lame is not defined.
- **Proposed change for D1.15:** Mortality levels vary greatly based on inclement weather and lifecycle stage. Smaller producers will be penalized by using a percentage for acceptable mortality. Mortality is not often used as an animal welfare indicator.  
**Comment:** The standard shall require that strategies are employed to identify and mitigate causes of mortality such as disease or inclement weather when mortality levels exceed acceptable herd norms.
- **Proposed change for D1.16:** The calving window is generally 30 to 60 days. If it is an extensive system, the farmer won't want to move younger calves until they are old enough to move to corrals for handling, otherwise their welfare will be at risk. Castration maximum age ranges need to work for these pasture-based extensive systems. With big extensive ranches, the cow-calf ratio might be 100 acres to one, so it's not easy to gather stock. A maximum six-week castration age doesn't even get all the calves born – and the farmers won't want to handle twice (and splitting the herd with early and later calvers can add another stress point). Option 3 in particular is a grass-based system. Would it be better to push towards pain relief? Either/or young age no pain relief, or pain relief (pre and post) and older ages would deliver better welfare outcomes. This could be reframed along those lines, though it must be noted that licensing issues could stop extensive systems in countries where pain relief is not licensed complying with this.

Extensively raised beef animals may be castrated at 16-24 weeks of age.

**Comment:** The standard shall require that pain management is used for calves that are castrated at greater than nine weeks of age.

- **Proposed change for D1.22:** These standards align with dairy industry standards, beef cattle are often dehorned later in life due to being raised extensively. Allowing dehorning if the diameter of the base of the horn is less than a quarter but requiring pain control would be appropriate.  
**Comment:** Dehorning is allowed if the diameter of the base of the horn is less than a quarter and a form of pain management is required to be administered prior to dehorning.
- **Proposed change for D1.24:** There are other circumstances where the farmer may need to brand the animal outside of regulations. Bank loans for farmers to buy stock in North America commonly require branding to be used to show ownership. Some breed societies reportedly require branding for pedigree animals too. Change to "required by regulations, financial institutions and breed societies."

- **Proposed change for D1.25:** Cover instead in mortality monitoring (as outcome to avoid with early breeding is mortality of mother and/or offspring). Minimum age is not a good indicator anyway – weight/size is better.
- **Proposed change for D1.26:** ‘Welfare traits’ is not a widely used term and should be defined or examples given.
- **Proposed change for D1.28:** The age at which the calf is weaned will determine whether transport at/around weaning (truck weaning) causes stress. Unless this is linked to weaning at less than 6 months of age, it may not be delivering much benefit.
- **Proposed change for D1.29:** As above, the age at which the calf is weaned will determine whether this delivers benefits. If the standard already requires that calves are not weaned until 8 months, the calf will already have largely detached from its mother.
- **Proposed change for D2.3:** In the US, the use of beta-agonists is not prohibited. Making this a baseline recommendation is not aligned with industry standards and it should remain an option in the recommendations.
- **Proposed change for D2.10:** Traceability has no direct correlation with animal welfare and should not be in the animal welfare benchmark. Identification and traceability may need to be separately addressed.
- **Proposed change for E1.6:** This needs to be clarified to state that slats and bedding are used when appropriate. Thermal comfort is not a baseline standard currently and needs to be moved to an option if the wording is to remain the same.  
**Comment:** The standard shall require that strategies are employed to promote thermal comfort in extreme weather, such as providing bedding and ensuring trailer slats are open or closed.
- **Proposed change for E1.8:** This requirement stops certifications that work in North America or Australia becoming benchmarked. The infrastructure of the beef industry in those places mean that slaughterhouses are often far in excess of 8 hours from the farm. There are already a lot of requirements about conditions in transport in the benchmark to protect welfare.

Canada regulations allow no more than 12 hours on a truck for unweaned animals, and a maximum of 36 hours for weaned animals, with a required eight-hour rest stop. Any recommendation less than 12 hours does not align with industry practice. The U.S. and Canada are large land masses where cattle oftentimes travel long distances.

Consider setting a minimum time even at the baseline, otherwise this guideline doesn’t have any measurable way of being adhered to.

- **Proposed change for F1.9:** In the US, FSIS has no requirement for stun to stick time and a specific number of seconds is inappropriate to specify as a requirement.  
**Comment:** The standard shall require that following stunning; animals are bled as soon as possible.
- **Proposed change general:** Wording for recommendations needs to be corrected to be consistent with how recommendations are described at the beginning of the document. ""Require"" should not be used in the recommendations, nor ""shall"" only ""should"".

While LIA D aims to mitigate the risks of some cruel practices, it is not doing enough to mitigate animal welfare risks overall and we would expect prompt short time improvements, along with substantial changes to counteract the risk of 'Poor' welfare states of the animals, according to the Five Domains.

While LIA A does not adequately mitigate animal welfare risks overall and urgent action is needed to eliminate all cruel practices. This would allow animals to suffer a 'Very Poor' animal welfare state according to the Five Domains.

In the 'health domain, 'injuries' provision scores as 'excellent' by requiring regular injury checks and having proper lameness management in place. There are also appropriate preventative measures and sick care in place in LIA (D), as well as access to pasture.

Some requirements for veal calves were added towards the end of the process of developing the AW benchmark. However, there are other aspects of calf management that are not covered by the benchmark, so there is a question as to whether if veal/calf skin is going to be benchmarked, there should be a separate framework (as there will need to be if/when Impact Incentives are expanded to other species).

**Pilot learning:** Individual animal tracing is not possible in many regions, allow for batch level tracing.

'Environmental comfort' is 'excellent' by requiring the animals to have appropriate shelter that provides them with thermal comfort, as well as shielding them from levels of noise that cause stress. Appropriate flooring is required in both options, however, appropriate bedding is also required for animals in LIA (D), a strength, as well as prohibition of tethering and individual keeping.

The AW benchmark is overly complicated with minimal difference between option 1 and option 2. Revising the benchmark to have three options in total (a good, better, best model) would simplify it. The highest level would still be pasture-based for the whole life, the other two levels would permit feedlots.



### B3. Leather Production Environmental Standards Benchmark

- **Proposed change for A1.4:** Merge the guidance with the requirement: The standard shall require an assessment of any subcontractor used from the proceeding 12 months. The assessment may be simplified, and random site audits should be an option specified in the standard.
- **Proposed change for A1.5:** The standard shall review records and data for at least the 12 months preceding the audit to verify that the requirements are being met, unless the facility has been open for a shorter time period, in which case, less than 12 months is acceptable.
- **Proposed change for A2.3:** According to A.1.5: records should be reviewed over the past 12 months. If we want 24 months to be a requirement, I suggest this becomes part of the requirement and not just the guidance. Or if guidance, as a recommendation.  
**Comment:** Visits carried out from the proceeding 24 months are considered best practice OR the standard shall review the recent visits of regulatory authorities and the auditing results of these visits over the past 24 months.
- **Proposed change for A2.4:** If 24 months is a requirement, it should be in the requirement section: the standard shall verify that the production site is acting in accordance with permit conditions and/or legislation and shall review any regulatory environmental enforcement actions or fines from the proceeding 24 months
- **Proposed change for A3:** Facility data: also include data on input material (raw, part processed).
- **Proposed change for A3.9:** A.3.7 and A.3.9 seem to overlap, suggest removing A.3.9
- **Proposed change for A4.7:** Merge A4.7 with A4.9: the standard shall ensure that documentation associated with the environmental management system is correctly maintained. The environmental management system shall be reviewed by a committee that includes senior management at least once a year.
- **Proposed change for A8.9:** Exemptions can be made if usage is low and remove the set limit.
- **Proposed change for A8.10:** Remove 'expressed in grams of solvent emitted to the environment per square meter of leather produced.'
- **Proposed change for A11.9:** "Should be completed within the first week of work on site" is seen as very prescriptive. The reference to the first week should be transferred to the guidance as best practice.

- **Proposed change for A12.8:** The standard shall require that all platforms, overhead working areas and rotating equipment at ground level (e.g., drums) have at least a solid metal bar guarding at waist height.
- **Proposed change for A12.9:** The standard shall require that chemicals within the storage area are adequately stored and labelled: chemicals are clearly labelled IBCs are not stored more than three units high; incompatible chemicals are not stored together If racking is used; all liquid chemicals are NOT stored above powder chemicals If racking is used; it is correctly weight labelled and in good condition/fit for purpose; health & safety information is available for workers in the area written in the local language.

#### B4. Leather Production Social Standards Benchmark

- **Proposed change for A3:** Does not adequately address the requirements for fees, as defined in the SSCI benchmark requirements. Use as SSCI.
- **Proposed change for A3.12:** Requiring remediation seems too specific – it may also be that the standard simply withholds certification. (Likewise for A4.5)
- **Proposed change for A4.1.3:** Language should be adjusted to include confidentiality:  
A4.1.3 The standard shall require that details on any children under the age of 15 years that are found to be working at the facility are available to review and anonymously reported in the audit or assessment report.
- **Proposed change for A4.3.1:** Define young workers (e.g., Between 18 and the minimum age of employment).
- **Proposed change for A4.3.2:** Does not correctly set the requirement for young workers not to be engaged in hazardous conditions.
- **Proposed change for A5.3:** That duly elected worker representatives (of trade unions and/or other worker organizations) have access to the workplace to carry out their representative functions.
- **Proposed change for A5.4:** 'The facility strives to engage workers through alternative lawful mechanisms of engagement' seems too specific
- **Proposed change for A7:** Should there be a requirement to have a person or team in the company specifically responsible for OHAS?
- **Proposed change for A7.3.1:** Do ALL workers require health and safety training?  
I'd assume yes for safety, but not necessarily health. Some standards may just require that there is safety training specific to the tasks being done.

- **Proposed change for A7.4:** Does not include a requirement for training to be provided during remunerated working hours.
- **Proposed change for A8.4:** Remove requirement – it is difficult to monitor this. It feeds into forced labor requirements.
- **Proposed change for A8.5:** Add examples of appropriate measures: The standard shall require that appropriate measures (such as licenses and/or risk assessments) are taken to evaluate and monitor the strength, stability, and safety of buildings and equipment, including worker accommodation where provided or mandated. Corrective action is taken where required.
- **Proposed change for A9.5:** Does not include a requirement for all payments to be made directly to the employee in legal tender or into a bank account in their name.
- **Proposed change for A10.1:** Does not set any requirement for normal working hours to respect ILO convention of 48 hours per week or for working hours to respect legal requirements. No standard can set a requirement that does not as a minimum meet legal requirement.
- **Proposed change for A10.2:** Working conditions that protect workers' safety and health. "The standard shall ensure that any overtime being worked is properly compensated, is voluntary, is in conditions that protect workers' safety and health, and there is no risk of forced labor." Even though A10.6 mentions "appropriate safeguards are taken to protect the worker's health and safety", it is under consecutive working days. A10.2 focuses on overtime hours. The same emphasis should be added.
- **Proposed change for A10.5:** "Every week" to every 7th day, i.e., "at least one rest day of 24 consecutive hours on every 7th day. "One rest day every week" can be, say, Tuesday of week 1 and next Sunday of week 2, which means having 11 consecutive working days in between.