



საქართველოს სოფლის მეურნეობის სამინისტრო
MINISTRY OF AGRICULTURE OF GEORGIA

სსიპ სურსათის ეროვნული სააგენტო
LEPL NATIONAL FOOD AGENCY

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To International Committee for Animal Recording (ICAR)

78 Via Savoia, S.C.A, INT.3,

00198, Roma, Italy

As you are well aware, the LEPL National Food Agency of Georgia under the Ministry of Agriculture of Georgia (henceforth – “Agency”), is the national authority responsible for the supervision and the official control in the fields of food/feed safety, veterinary and plant protection. Therefore, to perform its functions, the Agency conducts the registration of small ruminants for the purposes of population control and identification. Currently, this process has been suspended due to reasons connected with tagging abovementioned animals.

The ear tags of Ilkim Makina Kalip (IKPE300 Small) and Kupsan Tag Company (KM300) have been chosen by the Agency based on a very specific requirement of possessing an appropriate certification by ICAR. As of today, an overwhelming amount of evidence, as well as the test performed by the National Food Agency, clearly indicate, that, with a high degree of probability, such ear tags are the primary cause of harm to the animals they have been applied to, endangering their health. The test performed by the NFA basically excludes any other possibility regarding other likely cause of such complications.

According to ICAR Guidelines, Section 10.7. (*Testing and Certification of Permanent Identification Devices. Part 1: Conventional Permanent Plastic Ear Tags with or without Machine Readable Printing*) prescribes rules of testing and certifying tagging devices, including ear tags. According to Section 10.7.1. (*Introduction*), “Animal welfare and human health” represents one of the core issues to be considered during the testing procedures of permanent identification devices, which naturally includes ear tags as well. The same section stipulates, that ICAR or/and national authorities may randomly take samples of certified tags from the market and subject them to testing for the purpose of ensuring the compliance of certified ear tags with ICAR certification criteria. The outcome of non-compliance may be the withdrawal of the certification. The relevant Code of Conduct (Annex A3), an integral part of the testing application (see Section 10.2.5.2) also contains a specific term, which states that ICAR has

the capacity to withdraw certification procedure for any product, if the manufacturer breaches any condition of the Code. Furthermore, in Section 10.7.5.3.6. (*ICAR Conditions For Certification of Conventional Permanent Plastic Ear Tags*), paragraph 4(c) clearly ordains, that in case the manufacturer is being merely suspected of breaching the Code of Conduct, ICAR may take the sample products from the market and again test its conformance with that of the product, that has been submitted for the certification procedures. According to Paragraph 5 of the same Section, failure to meet the certification conditions is a prerequisite for withdrawal.

While the abovementioned Sections indisputably state the prerogative and the right of ICAR in conducting or not conducting the appropriate tests and re-evaluations, we think, as the facts of current case become more apparent, that it is in the company's best interests to take the initiative and by appropriating relevant samples of suspected tags, test their compliance with the certification requirements. It shall definitely be a boon to the company's reputation and benefit it's international standing. As mentioned above, our case unambiguously demonstrates, that in light of mounting evidence, the reason for our predicament lies in the inherent characteristics of ear tags and not in the peculiarities of specific animals or in the force by which the applicators are utilized. The test done by the National Food Agency once more affirms such conclusion as despite all the combinations that were employed, animals still suffered from various medical conditions, thus leaving only a single possible explanation – the ear tags.

We express our readiness to forward you all the appropriate ear tags, acquired by the National Food Agency via state procurement from the market, as well as all the relevant evidence (photographic, documental, experimental, etc.) pertaining to the case. We are also ready to perform our own testing in Georgia regarding the chemical composition of the ear tags in question at Levan Samkharauli National Forensics Bureau, an ISO 17025 accredited laboratory and the member of European Network of Forensic Science Institutes (ENFSI) and then send you the results of the examination, so you can compare the indicators with those that led to the certification in the first place.

We are certain, that ICAR shall treat this case with utmost seriousness it deserves.

We are looking forward to hearing from you at your earliest convenience.

Sincerely,

Zurab Chekurashvili

Head of National Food Agency of Georgia

