



Australian Alpaca
ASSOCIATION

Steve McCutcheon
Secretariat of the Technical Reference Panel
Department of Agriculture and Water Resources
18 Marcus Clarke Street
CANBERRA ACT 2601

Dear Panel

REVIEW OF THE AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK: AIR TRANSPORT

The Australian Alpaca Association (AAA) welcomes the opportunity to comment on the Issues Paper into the Review of the Australian Standards for the Export of Livestock: Air Transport. The AAA is the peak body membership organisation representing the interests of over 1500 farmer members from across Australia, including farmers who produce livestock for the alpaca livestock export industry.

The AAA believes that the current standards deliver acceptable animal welfare outcomes for exported alpacas. We agree that it is important that national minimum standards are set for livestock exports that ensure consistent welfare outcomes across the industry and provide clear criteria for our members to demonstrate their duty of care to the animals they manage. In particular:

- The AAA is satisfied that a cria at foot of liveweight 12kg and 3 months old is suitable for transport.
- The AAA is supportive of the rejection criteria that livestock showing conditions such as emaciated or over fat are not prepared for export. The AAA supports that the terms “emaciated or over-fat” are quantified using the body condition scores for alpacas and supports that the table as recommended by the ASEL: sea transport final report is adopted for air transport.
- The AAA does not believe that the requirements for exporting alpacas by air be replaced by the provision of consignment specific management plans. The current requirements are considered acceptable by the industry.
- 250 days gestation for transport of pregnant alpacas is adequate and the AAA is supportive of increasing the gestation up to 270/342 when the third trimester starts. A reduction is not supported.
- The AAA believes that appropriately qualified and trained laypeople be considered competent pregnancy testers for livestock destined for the pet and exhibition market. However, it is essential that a higher standard is maintained for the pedigree trade.
- The standards should not define a maximum travel time from the property where livestock are prepared to the airport but should instead reference the land transport standards and guidelines.
- The requirements of premises used for preparation of alpacas prior to air transport is currently acceptable to the industry. No alpacas are transported by sea transport.
- As alpacas are spontaneous ovulators, it is inappropriate for mixed sex consignments of entire males and females within the same crate or tier of crate.
- The AAA does not believe that more space is required for livestock loaded into the lower compartment of the aircraft.
- The current contingency planning and reporting requirements are adequate, and no further changes are required in relation to alpacas.
- The current definition of notifiable incident to include unavailability of aircraft, mechanical breakdown and rejection of consignment are adequate.



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The AAA appreciates the opportunity to comment on the ASEL Review and reinforces that any amendments must be based on clear scientific evidence to ensure that good animal welfare outcomes are achieved.

Yours sincerely

Amanda Olthof
CEO

Yours sincerely

A handwritten signature in black ink, appearing to read 'Amanda Olthof', is written over a light blue rectangular background.

Amanda Olthof
Chief Executive Officer