

Feedback from Andrew McKinnon, President, Deer Industry Association of Australia on proposed version of ASEL

Standard (proposed version of ASEL)	Currently states	Issue
Reportable Mortality Level	Deer: 2 per cent	Deer stress levels higher than cattle or sheep. Mortality is often stress related. Suggest 3 per cent.
1A.3.7 Rejection Criteria Deer	c) not have unhealed velveting wounds	Velveting wounds dry out and stop bleeding within a day or two but can take weeks to fully heal / calcify into bone . Suggest revising.
1A.3.7 Rejection Criteria - Deer	d) not have broken antlers	According to Land Transport standards deer cannot be moved with antlers longer than 100mm. Suggest removing Maybe should be changed to "not have broken velvet"
1A.3.7 Rejection Criteria - Deer	f)(i) have hard antlers longer than 5 cm removed leaving only buttons	Should have the same requirements as by air: "not be in velvet or hard antler" because they grow quickly and may be in velvet or hard antler by the end of the voyage. Suggest revising. Changing to : must have all hard antlers removed, leaving only buttons. Velvet must be less than 10cm in length
1A.3.7 Rejection Criteria - Deer	(f)(ii) not have in velvet antlers longer than 10cm	Should have the same requirements as by air: "not be in velvet or hard antler" because they grow quickly and may be in velvet or hard antler by the end of the voyage. Suggest revising. Leave this as is
1A.3.7 Rejection Criteria - Deer	(f)(iv) if over 12 months are not in rut	Male Deer may be 'not in rut' at start of voyage but could be 'in rut' by the end of the voyage. Suggest revising to: Male deer must arrive at destination before 20 Feb*.
1A.3.7 Rejection Criteria - Deer	(g) (i) not be in velvet or hard antler	Suggest remove this statement and change to "must have all hard antlers removed, leaving only buttons. Velvet must be less than 10cm in length"
1A.3.7 Rejection Criteria - Deer	(g)(iii) be outside the roar and rut periods if over twelve months old	Male Deer may be outside these periods at start of voyage but inside by the end of the voyage. Suggest revising to: Male deer must arrive at destination before 20 Feb*.

2.A.2 Premises meet appropriate operational and design specifications for the type and species of livestock being prepared for export	(a)(v) C. deer – 2 per cent of their bodyweight per day of a quality feed able to meet daily maintenance requirements.	This doesn't seem enough. Stock being weaned for export get 3 per cent as a rule. Suggest 3 per cent.
3.A.4 Stocking density and penning arrangements	(b) For export of deer by sea, only solid walled pens with an adequate number of ventilation holes and 250mm to 300mm at the top and bottom may be used.	Too high at the bottom. Fallow deer would get under the pens and escape. Suggest 200mm.
Appendix A, Table #5	Deer Body Condition Scoring	Suggest scores from 2-5 should be suitable to export as long as rations are at 3 per cent of body weight.
Appendix G, Table #13	Feed per head per day 'At least maintenance rations'	Suggest 3 per cent.
Appendix G, Table #13	Water per head per day	No set rules to this. On-farm they refill as they drink. Deer farming handbook from NZ suggests min 8.2L per day in summer. Suggest increasing this by 25% - min 10L per day.
Appendix G, Table #14	Additional Water	As above.
Appendix G, Table#16	Seasonal nutritional requirements	Difficult to understand/translate. Looks enough. Pellets aren't good for deer. Pellets are good so long as they contain sufficient energy levels.
Appendix G Table #24	Liveweight (kg) >100kg	Suggest the following: 25kg - .375m ² 50kg - .75m ²

* Mr McKinnon advised that for Red, Fallow, Wapiti/Elk deer 20 February represents the last date before rutting/roar period begins. Must be at destination by this date. **This date allows an extra week before rut.**