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ASEL Review Secretariat  
Dept. of Agriculture and Water Resources  
GPO Box 858  
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To Whom it May Concern,

I am writing to you this submission for the ASEL Air Transport Review in my position of National President of the Deer Industry Association of Australia (DIAA).

My comments and recommendations below are based on my personal experience in establishing commercial deer farm and its successful operations and deer management for nearly 30 years.

In my opinion:

3.2.1 S6.14 current requirements are acceptable

S6.15 my previous recommendations as outlined in 3.2.2 stand and will be acceptable for air transport.

I also wish to reiterate my recommendation that for sea freight, it be added that stags must arrive at their destination before the rut. If stags leave Australia for a 6 week sea journey in mid February, they will be in full rut by the time they reach their destination and my concern is that there will not be many standing. In fact an extremely high mortality rate is a near certainty and the government would be held liable if the industry's recommendation was not taken into consideration.

I do not believe there is a need for relevant export requirements for deer to be replaced with consignment-specific management plans.

7.1.2 mortality reporting for deer – having this figure at 1% is completely unreasonable and should be changed to 3%. Deer can have a naturally more stressful nature than sheep and cattle and this can lead to deaths depending on the levels of stress they are placed under. This should be take into consideration.

Sincerely

Andrew McKinnon  
President  
Deer Industry Association of Australia