



Deer Industry Association of Australia

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Submission regarding Proposal P1014 Primary Production and Processing Standard for Minor Meat Species and Wild Game

The directors of the Deer Industry Association of Australia (DIAA) are generally supportive of the aims of proposal P1014.

However, the directors raise strong objection to the farmed deer industry being included with antelope, camels, horses etc, and most especially with wild game. The directors are of the opinion, while accepting that farmed deer are a minor meat species, that farmed deer should be included in with the major (mainstream) meat species, and thus be included in P1005. In the same way as the farmed pig industry is separated from wild boar.

The directors believe it would be difficult to develop one draft standard that would cover species and industries as diverse as farmed deer, rabbits, crocodiles and wild shot game.

The farmed deer industry cannot be compared with any of the minor meat species listed, with the possible exception of the very small buffalo industry.

They are farmed ruminants and management, transport and abattoir procedures are identical with procedures followed for the mainstream meat industries.

Venison is generally more easy to trace to its source than other meat species as deer are transported from farm to the abattoirs without an intervening stock market.

Farmed deer are recognised as mainstream meat producing animals by government and are listed in legislation such as the 1997 ruminant food ban. Wild deer may ingest "restricted animal material".

Our industry wishes to distance itself from the wild shot venison market as they do not pay research and development levies, nor participate in the National Residue Survey for which farmers of farmed deer are levied 4c/kg hot standard carcass weight. (to rise to 6c/kg after The 1st July).

Wild shot venison can be sold in butchers shops without identifying labelling- an unfair marketing advantage over the farmed product.

In support, I have attached a paper prepared by one of our members- a farmed venison processor from South Australia.

Another concern of the DIAA regards the costs of this proposal and who will carry the burden. We hope that it will not be one more cost passed down to the primary producer that he cannot recoup.

Andrew Hansen
President DIAA

Comments by DIAA member.

Proposed supplementary labeling requirements for meat products for human consumption.

Please consider the following information for "source identification" labelling.

1. For the purposes of meat for Human Consumption, farmed deer are considered the same as other traditional farm animals, ie cattle, sheep, goats, pigs, poultry & etc.
2. Farmed deer are born, raised and husbanded in a controlled farm environment
3. Farmed deer are yarded and transported to approved abattoirs for the intention of slaughter for human consumption.
 - a. When presented at the approved abattoir, farmed deer become subjected to AS4696:2007 Australian Standard for Hygienic Production and Transportation of Meat and Meat Products for Human Consumption; FRSC Technical Report Number 3.
 - b. There is specific exclusion of wild cervidae, "Wild State", within AS4696:2007
 - c. Wild Cervidae are subject to AS4464:2007 Australian Standard for Hygienic Production of Wild Game Meat for Human Consumption; FRSC Technical Report Number 2.

Issues arising from the differences of the processing features of AS4696:2007 and AS4464:2007 are:

1. Chemical Contamination
2. Ante Mortem Inspection
3. Identification and Traceability

Compliance with the Australian Standards fails when deer meat produced under AS4696:2007 is combined with deer meat produced under AS4464:2007. There is no current obligation for labeling to identify further processed Farmed Deer Meat and Wild State Deer Meat.

Aspects to consider:

1. Wild State Deer Meat is not subject to NRS levy.
2. A residue test profile history does not exist for Wild State Deer
3. Without testing, the residue disposition of each and every Wild State deer cannot be determined as fit for human consumption
4. Wild State Deer are free to roam and have ability to cover long distances in short time frames. Home ranging of Red Deer indicate from 400 hectares (females) and 800 hectares (males) while in environment with less presence of forests it can reach 1000 hectares and even 5000 hectares (The Italian Institute for Environmental Protection and Research, ISPRA (Istituto Superiore per la Protezione e la Ricerca Ambientale). Research to record both home ranging and the extreme ranging of Wild State deer (red deer and fallow deer) in south eastern Australia is currently being carried out using satellite tracking collars. There are many confirmed and anecdotal instances Australia wide that can be cited of deer appearing in locations many kilometers from known deer farms or established Wild State home range regions.
5. Because of the unrestricted wide ranging free roaming nature of Wild State Deer, they have access to numerous prescribed substances ranging from chemical sprays used in pasture and crop management to dead animal tissue and properties that may have quarantine orders placed against them.
6. Farmed Deer are from a known source and are subject to legislated and regulated animal husbandry practices that exclude access to prescribed materials and other

- materials or medications that have prescribed withholding periods that must be complied with prior to submitting farmed deer to slaughter for human consumption.
7. Farmed Deer Meat is subject to NRS levy and tested accordingly, therefore having a testing profile history

A major concern is the loss of identity and traceability of the Wild State Deer Meat after further processing and preparation of carcasses for wholesale, trade and retail sale. After carcass breakdown and entry into the market place (wholesale, trade & retail), there is no provision for compliance of segregation or identification between that of Wild State Deer Meat and Farmed Deer Meat.

The considerable differences of processing compliance under the appropriate Australian Standards for that of Farmed Deer Meat and Wild State Deer Meat provides a bare minimum case to apply a mandatory labeling statement, inclusive of wholesale, trade and retail sales, informing and alerting consumers of the health disposition and chemical residue risks associated with Wild State Deer Meat. The label should also provide a statement of a tight geographical "home range" region, eg the property name, in order to identify where the Wild State deer meat was sourced to aid trace back when a health problem occurs.

An appropriate risk management solution is to apply HACCP principles and either:

- A. Eliminate the health risk by withdrawing Wild State Deer Meat as being fit for human consumption
- B. Reduce the health risk by residue testing every Wild State deer harvested for human consumption

Wild State Deer residue testing should not be permitted to impact upon the NRS levy collection system currently in place for Farmed Deer presented at regulated abattoirs. The testing regime should be considered as an additional cost to the harvesting of Wild State Deer.