

South Australian Poultry Association

Mr Ron Hall –President

Mrs Trudy Hull – Secretary

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16th February 2018

Animal Welfare Standards Public Consultation

PO Box 5116

BRADDON ACT 2612

To Whom It May Concern,

RE: SUBMISSION TO THE DRAFT ANIMAL WELFARE STANDARDS AND GUIDELINES FOR POULTRY AND THE POULTRY REGULATORY IMPACT STATEMENT

South Australian Poultry Association (SAPA) is an incorporated body representing the entire exhibition poultry fraternity of South Australia. SAPA currently has 13 member clubs representing approximately 300 poultry fanciers. It is important to note that SAPA does not represent pigeon fanciers; separate racing and exhibition pigeon clubs represent a large cohort of enthusiasts.

SAPA shares ideals with other state peak bodies; we aim to promote the breeding and exhibiting of pure bred poultry for pleasure. Our members are not commercially motivated, most expending large amounts of money to maintain studs of birds for exhibition. Many breeds are endangered with breeders maintaining closed gene pools for many years. Welfare of our flocks remains foremost in the minds of most breeders; we therefore support the creation of national welfare standards for poultry.

SAPA supports the *Standards and Guidelines* and the *RIS* with a few exceptions. These are outlined below.

Standards and Guidelines

SA7.3 – A person in charge must monitor ammonia levels and ensure immediate corrective action is taken if ammonia levels reach 20ppm at bird level in sheds.

Exhibition poultry are housed at a low density when compared to commercially housed poultry. Build-up of ammonia is rarely an issue with low stocking rates. The purchase of equipment to enable monitoring of ammonia levels would place an unnecessary financial burden on our members and we recommend exemption from the Standard for non-commercial operators.

SA9.8 - A person other than a veterinarian must not perform pinioning, castration or devoicing, on poultry.

Pinioning of bantam breeds of waterfowl has been traditionally undertaken by most breeders. It is a well-researched and commonly observed fact that Mallard (*anas platyrhynchos*), a commonly kept and exhibited duck frequently inter-breeds with the Pacific Black Duck (*anas superciliosa*). Pinioning forms part of a responsible management programme for breeders enabling birds that accidentally escape to be easily recaptured. It is unlikely that an escapee that was not pinioned would be captured. Visits to any watercourse in Australia will see both Mallards and hybrid ducks from the indigenous Pacific Black Duck. We therefore recommend that pinioning be transferred to SA9.10: 10 *A person must only perform **pinioning**, desnooding, dubbing, despurring and web marking on day old hatchlings selected as potential breeders.*

Regulatory Impact Statement

SAPA supports Option B (convert the proposed national standards into national voluntary guidelines).

There is a real risk that many heritage and rare breeds of poultry will be lost with the implementation of an overly rigid national standard. The maintenance of the genetic diversity available in pure-bred poultry is vital to the future of our commercial poultry industry. This has been demonstrated in recent history when the European broiler industry sourced pure-bred *Transylvanian Naked Neck* fowls to develop new lines of broiler fowl. *Naked Necks* are a very rare fowl world-wide; with very few examples in Australia.

SAPA appreciates the opportunity to comment on the standards and wish the consultative committee well in their deliberations.

Yours sincerely,

Mrs Mary Scruby

Mr Gavin Woods

SAPA Delegates to Exhibition Stud Poultry Australia