



Leghorn Club of Australia Inc.

Founded in 1947 as 'The Black Leghorn Club'

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Animal Welfare Standards Public Consultation
PO Box 5116
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To Whom It May Concern,

Leghorn Club of Australia's Submission Regarding Australian Animal Welfare Standards (Poultry)

The Leghorn Club of Australia Inc. is Australia's national breed club for the Leghorn breed. The club has members (in excess of 200) in every state and territory within Australia. The club holds three annual exhibitions in NSW, QLD and Victoria in addition to supporting Leghorn classes at shows nationwide.

The Leghorn Club's members are passionate about their poultry and the welfare of such. Members strive to preserve the heritage of the Leghorn breed in Australia. In order to present poultry in adequate condition for exhibition our members can only do this by keeping their poultry in conditions that are favourable to the welfare of their birds.

The Leghorn Club of Australia welcomes the opportunity to comment on the Draft Australian Animal Welfare Standards and Guidelines for Poultry and the Poultry Regulatory Impact Statement.

The Leghorn Club of Australia on behalf of its members holds and raises a number of concerns relevant specifically to the *Standards and Guidelines* and the *RIS* as set out in the following:



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Standards and Guidelines

Section 6 – Lighting

SA 6.4 - *A person in charge must ensure poultry are not exposed to continuous light or darkness in any 24 hour period except on the day of pick-up (meat chickens) and meat chickens during very hot weather.*

SA 6.5 - *A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.*

These proposed standards do not account for husbandry requirements for small batches of chickens hatched in incubators which then need to be reared initially in brooding boxes. As these rearing conditions cannot be fully climate controlled in comparison to commercial large scale poultry sheds, our chickens need to be able to seek warmth. A heat source is typically provided in conjunction with a continuous light source in order for the chickens to be able to seek the warmth. Once the chickens have learnt how to seek warmth from the heat source we then typically remove the light source (by one week of age). Thus, the Leghorn Club of Australia requests that exhibition poultry be excluded from 6.4 and 6.5 or they be re-written to accommodate the husbandry requirements of our members.

Section 7 – Temperature and Ventilation

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

The need for this standard exists due to the way in which commercial poultry are kept. Its relevance is lacking when the way exhibition poultry keepers house their birds is considered (ie. stocked much less densely than commercial birds and in open fronted sheds with natural ventilation unlike commercial situations). Our members thus should not be expected to incur the burden of monitoring ammonia levels in our sheds. This poses both unnecessary financial and time costs to our members.

Section 9 – Handling and Husbandry

SA9.10 - *A person must only perform desnooding, dubbing, despurring and web marking on day old hatchlings selected as potential breeders.*

Invariably the need arises for our members to dub or toe-web mark our potential breeding stock. Dubbing is not customary; however, in some cases it is necessary for welfare reasons in Leghorn males as their combs can become too large affecting the bird's general health, ability to eat and drink and ability to reproduce. The proposed standard thus has welfare implication for our members' birds as our members do not have the capacity to sex their chickens at day-



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old. Given that all of our chickens are potential breeders and show birds, we cannot be expected to dub every chicken at hatch. Furthermore, as a reasonable portion of our members chickens are hatched under hens (ie. naturally), dubbing chickens at hatch poses a welfare concern as the chickens and mothers would be disturbed at this vital time. In relation to dubbing, the Leghorn Club of Australia proposes that for exhibition poultry, dubbing is to be performed by 16 weeks of age (prior to maturation of the comb) and by experienced personnel.

Toe web marking is typically performed at day-old on chickens hatched in incubators; however, may be performed later in chickens hatched under hens. As previously alluded to, it is important that chickens hatched under hens are not disturbed in the first week of life. Seven days of age would be an appropriate age restriction for toe-web marking. In relation to toe-web marking for exhibition poultry, the Leghorn Club of Australia proposes that 7 days be the oldest age at which toe-web marking can be performed.

Regulation Impact Statement (RIS)

The RIS does not account for the potential loss of Leghorn genetics in Australia which may result if our concerns raised above are not adequately addressed. The Leghorn breed has been a key genetic component of egg laying strains in Australia for many years.

From the RIS, the Leghorn Club of Australia proposes Option B (*Convert proposed national standards in national voluntary guidelines*).

Yours faithfully,

T.A Burley
President