



P O Box 6438
SOUTH LISMORE NSW 2480
Email: secretary@lismorepoultryclub.com.au

PRESIDENT: Mr John Gibson
Phone: 02 6629 0254

TREASURER: Mr John Kendall
Phone: 02 6622 3804

SECRETARY: Mr Eric Rosolen
Phone: 0428 659341

Thursday, 22 February 2018

To: Animal Welfare Standards Public Consultation,
PO Box 5116
BRADDON, ACT, 2612

Sent via email to publicconspoultry@animalhealthaustralia.com.au

From: Members of Lismore Poultry Club Incorporated.

RE: PROPOSED AUSTRALIAN ANIMAL WELFARE STANDARDS & GUIDELINES FOR POULTRY

Lismore Poultry Club Inc. is one of the oldest Poultry Clubs in Australia holding two poultry shows per year for over 100 years. Our members have worked tirelessly for many years to promote and improve the pure breeds of poultry on the Northern Rivers area of NSW. The health and welfare of these poultry is of utmost importance to the breeders and fanciers of pure breed poultry and to this end we have had to cancel several our exhibition due to disease outbreaks in commercial flocks that have shut down transportation of poultry for quarantine purposes. This is the reasoning behind this submission to the Animal Welfare Standards Public Consultation.

The areas we would like to address specifically are:

- 1) Draft Poultry Welfare Standards and Guidelines; and
- 2) Regulation impact Statement for the Draft Poultry Welfare Standards and Guidelines.

❖ GENERAL COMMENTS

The proposals outlined in this document have arisen with the Purebred Poultry sector having little or no advise of discussion. The Agricultural Societies of Australia who were involved largely in the consultation process to date represent a minute part of those enthusiast that breed and maintain these genetically significant breeds of poultry. Whilst most agricultural societies do have Poultry sections in their shows, these are usually run or overseen by the local Poultry Club. With this in mind we request that further consultation on the impact of these Draft Standards and Guidelines be held with entities that better represent the majority of Exhibition Poultry organisations.

This consultation is necessary given the volume of material involved in the make-up of the proposed Standards and Guidelines and would allow more representative input into the possible impacts and applicability of many of the proposed actions and regulations.

❖ FEEDBACK TO SPECIFIC STANDARDS AND GUIDELINES PROPOSED

S.A.6.4 and S.A.6.5- Relating to continuous light exposure to poultry.

Purebred poultry should be exempt from these standard as they are often reared under artificial lighting as a heat source to sustain the warmth necessary to keep young chicks that have been hatched via artificial incubation alive. This form of brooding is usually performed in very small numbers and low densities in comparison to commercial brooding.

S.A. 7.3- Relating to monitoring of ammonia levels in sheds.

As purebred poultry are usually kept in small numbers and low-density penning, often free ranged for part or all day, they should be exempt from this requirement.

S.A. 9.10- “A person must only perform desnooding, dubbing, despurring and web marking on day old hatchlings selected as potential breeders.”

This standard and guideline has the most relevance to exhibition poultry breeders particularly game breeders as the procedure of dubbing is carried out to maintain the health and welfare of the stock. Most commercial birds are culled as their production levels fall generally two to three years whereas purebred poultry are often kept for longer periods (up to 10 years) to preserve the genetic value of these sometime rare or endangered bloodlines. To do this the health and welfare of the birds is very important, (you can't breed from bird that are stressed on unhealthy).

The modifications to the guidelines that we are suggesting are specifically to assist in maintaining these valuable bloodlines. We seek the following amendments to the guidelines.

- **Dubbing of day old chicks** would be detrimental to the welfare of the chicks as;
 1. Large numbers of female chicks that wouldn't be dubbed would now be dubbed as it would be very difficult for unpractised persons to sex chicks at day old and
 2. Dubbed chicks would be vulnerable to attack from other brood mates and brood hens for those hatched naturally under hens. (any handling of chicks at day old can also cause hens to abandon a hatch which would increase the stress levels on chicks and hen.)

The proposal is to delay the dubbing procedure to no later than 16 weeks and that it be carried out only by experienced and accredited persons.

This would allow for the dubbed birds to be separated from others to allow for proper healing and prevent attacks by other fowls. It would also ensure that no females were unnecessarily dubbed, and males are only dubbed for welfare reasons.

Our Club would support the development of appropriate standards and guidelines for such accreditation of person to carry out these procedures as this is completely along the lines of our goals to promote the welfare of exhibition poultry and the maintenance of their genetic viability. We would be happy to work with Animal Health Australia to develop this accreditation process.

- **Despurring** is not generally done by poultry exhibitors except for the occasions where an adult bird is injured accidentally whilst foraging. This may require the repair and dressing of the damage and sometime the removal of the spur depending on the extent of the injury, but only to assist the birds' welfare in its recovery.
- **Toe marking** is generally carried out at day old if chicks are hatched artificially, but as pointed out earlier if chicks are hatched naturally (i.e. under a hen) this can cause undue stress to both hen and chicks. A suggested cut off time of one week would alleviate this problem.

S.A. 9.12 A person must use appropriate pain relief when carrying out surgical procedures on poultry.

As there are no registered product for administration to poultry for pain relief the use of an “off label” product would be required. This would be impractical as permits would be required every time a product was obtained, particularly in the case of accidental injury to a spur or such. The time taken to obtain such a permit and then source the product would surely cause more stress to the injured bird.

Regulation Impact Statement (RIS) upon Poultry in Australia

We note that in Section 1.4 “Consultation Processes” that the aim must be for purebred and exhibition poultry breeders' interests to be represented to better understand the likely impacts of these proposed

standards and guidelines. Unfortunately, as outlined earlier in this submission, those involved in maintaining the genetic resource of pure breeds of poultry has not been properly consulted or represented during this process leading to the development of this proposed "Australian Animal Welfare Standards and Guidelines for Poultry". As a result, the RIS does not consider the impact to the Australian poultry industry if the pure breed genetic resource was to be depleted by adverse responses to the proposals. Furthermore, the cost impact of compliance and maintenance of the proposed standards and guidelines has been overlooked as a result of the inadequate representation of the purebred and exhibition poultry sector. Each state has a peak body that represents the exhibition poultry associations in their state and a National body, any of these could and should have been included in all discussion on the proposed Standards and Guidelines.

As members of the group of people entrusted with the protection and welfare of the pure breed poultry genetics, we hope you will consider our submission of our concerns and look forward to further consultation in an effort to the development of Standards and Guidelines than promote the furtherment of the sustainability and welfare of all poultry (including Exhibition Poultry) in Australia.

Yours sincerely

Eric Rosolen
Secretary
Lismore Poultry Club Incorporated.