

To Whom It May Concern .

My thoughts after reading the 'Proposed draft'

As I read the draft my thoughts went two ways; 1. How it reflected my own setup and what would I have to change and 2. That it seemed to me to be concerned mainly with the commercial keeping of poultry, although the first section was supposed to relate to fanciers. There were only two things that I would not comply with, pop holes, mine are deliberately small to keep the larger breeds away from the smaller breeds and my watering system is deliberately set up on the outside of sheds so if there is a leakage in the system it will not result in wetness in the protected/dry areas.

My personal opinion is that there needs to be a small section dedicated to the fancier and back-yarder to reflect some obvious differences in poultry keeping.

My only real concern is the space allowances.

How much space would be required for a bantam hen with 8 one week old chickens?

I would point out to those putting the draft laws together that the smaller the space the better when it comes to the wellbeing of chickens (within reason, of course). Too much space and chickens get lost and die from hyperthermia.

I could find no guide lines for small/young chickens. How much space would be required for 20 chickens just two weeks old that are being hand reared, still in a brooder and under heat?

Also the size descriptions do not cover adequately the large range of bantams kept by most poultry fanciers. I have listed the heaviest weights given for the following bantam breeds as an example of size. Sebrights 740g; Japanese 620g; Dutch 550g; Modern Game 790g; Old English Game 910g; Silkie 680g; and lastly to point out the bantam weight of a heavy bantam breed 960g for a New Hampshire bantam. **Please give more thought to the tiny breeds of poultry that are kept by so many people around Australia.**

Another thought was show pens. That is the ones at home we use to train our birds in. Would these be seen as housing or will they fall into the same category as the show pens in the pavilion?

Feeding troughs: guidance given is seven centimeters per bird, but what about two-sided feeders, example my home-made feeder is 4 feet and designed and placed to be used as a two-sided feeder making a feeding area of approximately 9 feet (both sides and ends). Also will a tiny Dutch bantam need the same feeding area as a Croad Langshan?

Summing up; if these guidelines are going to be used by ALL keepers of poultry then there needs to be more consideration given to poultry kept for pets, showing and some-one keeping say, six chooks for eggs, and definitely more consideration given to the huge variation in the size of birds from the tiniest (Dutch 550 gms) to the largest (Dorking 6.35 kgs) breed among showing breeds and backyard breeds.

1. **Dubbing:-** Sorry, but fanciers will get no sympathy from me when it comes to dubbing, just as I did not believe in docking puppies' tails.) People's attitudes will change and maybe the breed will be better off for it, only time will reflect that. The comb, wattles, etc. are described in the standard already and there are breeds with almost no facial decoration such as the Asil. Fanciers **do not** need to dub roosters; do not let them pull the wool over your eyes! It is only one breed that is dubbed (Old English Game) there are several other breeds in a similar category and none of them are dubbed.

2. Show pens?
3. Carry boxes?

I did not see anything in what I read that directly pointed to the last two issues?

If we show poultry then does all the poultry we keep come under the jurisdiction of 'Exhibition Poultry' or just the ones we actually show?

B1 SB1.6 does not allow for tiny breeds of poultry

GB1.15 also does not allow for small breeds

Other notes: SA 6.5—young chickens should only be warmed with a heat lamp, they should never be subjected to a light or infra-red. (a chickens light pulse threshold is more than 100 light pulse cycles per second), less than this and it is a bit like being at the disco. (I doubt many breeders would be aware of this)

SA 7.3—monitoring of ammonia levels; does some-one with just a few chooks need to buy an expensive monitor for ammonia levels? I am sure our noses would be a very good indicator. Also most poultry for showing and back-yard poultry are housed in open type sheds. If ammonia levels became a problem it would not be because that person did not have a monitor but because that person could not be bothered fixing the cause.

SA 9.8 and SA 9.10—pinioning, I would have thought this would be desirable where bantam breeds of waterfowl are kept near wild ducks. They do cross breed and pinioning helps prevent this. Maybe if the wording for this was changed to say, pinioning only at less than 3 days by an experienced person or otherwise a vet? Also toe punching is practiced by 90% of breeders in the fancy, it would be the biggest identification tool used. This practise causes no harm at all if done the day a chicken hatches, there is no blood at all and usually no reaction from the chickens, certainly less stress than the actual catching of the chicken.

SA 9.12---the administering of pain relief. What is and is not recognised as a surgical procedure? Do I have to administer pain relief to toe punch my one day old chickens?

I thank you for this opportunity to voice my concerns and thoughts.

Jill Weaver, secretary

Tasmanian Rare Breeds Poultry Club

(also author of poultry book 'Keeping Happy Poultry')