



# *The Modern Game Club of Qld Inc*

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2 February 2018

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

### **Public consultation for the draft Australian Welfare Standards and Guidelines for Poultry**

The Modern Game Club of Qld Inc is a Breed Specialist Club incorporated in the State of Queensland with the sole objective being to **promote the breeding and exhibiting of modern game fowl in both standard and bantam varieties.**

We represent some 50 financial members throughout the State conducting one annual show each year and sponsoring breed features at club shows throughout the State. Amongst our membership are several nationally recognised judges and specialist breeders of our fowl.

As exhibition poultry fanciers, we are all dedicated to the welfare of our breed and it is in our interest in the pursuit of the ideal fowl that our birds are well looked after and as such their welfare is our primary concern as is bio-security within our flocks.

Whilst we are in agreement with the major part of the draft document, our members have highlighted a few concerns and have sought clarification on other points.

Our members wish to highlight that much of the document is more directly aimed at commercial operations and our members are all small flock specialists that merely breed fowl as a hobby with the aim of producing the ideal fowl for our breed. We do not want to see unreasonable or, in many cases, impossible standards imposed on our highly historical breed that, in many areas throughout the State, face the threat of extinction as the breed is now really only in the hands of highly dedicated fanciers and, apart from specialist shows, are not seen in large numbers anywhere.

### **Standards and Guidelines**

#### **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 for the day of pickup (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 standards appear to be related to commercial operations. This does not represent our situation which is non-commercial chicken rearing. Our breeders hatch in small batches especially in the case of modern game fowl which are in the majority bred under broody hens with the chicks then placed in brooders. Often these brooders are warmed by a light source to enable chicks to seek warmth.

We ask for an exception from SA 6.4 and SA 6.5 as these clauses do not cater for the requirements of rearing small flocks of exhibition fowl.

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## **Handling and Husbandry**

*SA 9.10 A person must only perform snooding, dubbing, de-spurring and web marking on day old hatchlings selected as potential breeders.*

There are times when it is important to dub modern game fowl males for their own welfare. The male fowl has, by nature, a large comb whereas the female has a shorter, less easily damaged comb. Both sexes can be particularly pugnacious in character and will damage each other when housed together, even a male and a female housed together for breeding purposes. We contest that it is not in the fowls' best welfare for the fowls to be constantly housed in solitary confinement but rather in small groups, thus making dubbing necessary.

It is highly impractical to dub modern game fowl as day-olds as it would result in the unnecessary accidental dubbing of females.

In addition to this, as previously stated, many of our fowls are bred under broody hens and disturbing a broody hen setting on chicks could result in catastrophic mortality if the hen should be disturbed. It is very important that a hen be left alone to rear her brood. If a chick under her care was dubbed, it is highly likely that the hen would damage and, in most cases, destroy the chick. Interfering with a brooding hen and her chicks whilst in the natural brooding process is not desirable due to the highly probable death of a dubbed chick.

As the proposed standard does not allow for necessary dubbing due to the age limit, we request that, for exhibition poultry, dubbing may be performed up to 16 weeks of age, which is prior to sexual maturity, and to be done by experienced persons only.

## **De-Spurring**

Our members sought clarification on this matter, as the day old de-spurring occurs in the commercial industry and does not take place in the exhibition poultry fancy. The spurs on fowl grow long and sharp and require trimming to ensure their own health and mobility and that they are not a danger to other birds and to handlers.

## **Regulatory Impact Statement**

Our members are concerned that, whilst exhibition poultry are mentioned in the Regulation Impact Statement, the costs of implementation of the standards, to either shows or our breeders, do not appear to have been taken into account. Our members are naturally concerned about the impact of the changes and it is our belief that our already diminishing numbers will drop as breeders find the standards impossible to maintain. Our members feel that there has been no thought given to the long term impact on the associated commercial industries that are closely connected to the exhibition poultry community. We believe that product suppliers, feed suppliers and related retailers would suffer substantial loss should our fancy be impacted.

Our members seek to be adequately represented in the consultation process and wish to highlight that, whilst the agricultural societies are represented through the FCAS delegates, agricultural shows represent only a small number of the poultry exhibitions throughout the nation. Our members highlighted that our State Peak Body is the FCAQ Inc and that the National Peak Body is the ESPA for exhibition poultry in Australia and have asked that these bodies be given representation in the consultation process.

Of the options outlined in the Regulation Impact Statement, our members felt that Option B is the preferred option until such time as the concerns raised above pertaining to the proposed standards be adequately addressed.

Our members have expressed their thanks that they have been afforded the opportunity to contribute their comments to the Draft Australian Welfare Standards and Guidelines for Poultry and the Poultry Regulation Impact Statement.

Yours faithfully



**Geoff Reimers**  
Acting Secretary  
MGC of Qld Inc