

Animal Welfare Standards Public Consultation  
PO Box 5116  
BRADDON ACT 2612

To Whom It May Concern,

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

I am a dedicated exhibitor and breeder of exhibition poultry for over 40 years and have always promoted and supported appropriate and sustainable welfare practices in all poultry circumstances and welcome the development of these new draft Australian Animal Welfare Standards and Guidelines for Poultry.

It would be inappropriate to compare Commercial poultry operations with exhibition poultry breeders. Apart from the obvious differences in the sheer size of the operations, there are also the dissimilarities in breeds kept by exhibitors/breeders compared to commercial operators. Like my self the breeds kept by exhibitor's most have historically importance, being rare and or are heritage breeds that are being bred by enthusiasts in an endeavour to maintain the genetic diversity of our poultry stocks in Australia, some of which are under serious threat. Breeds dramatically range in physical size, temperament, and husbandry requirements. The exhibition community is passionate about their hobby and are genuinely dedicated to ensuring a high standard of welfare and care for the breeds they hold in trust for the future.

I would give greater preference for a separate set of standards and guidelines be developed with greater consultation with the relative state bodies, and the exemption of exhibition poultry breeders from these draft Australian Animal Welfare Standards and Guidelines for Poultry.

While I am in agreement with the majority of the content of the draft, I would like to make a number of requests that I believe would make the new proposed Standards and Guidelines and the Regulatory Impact Statement (RIS) more inclusive of exhibition poultry. I do not want to see unreasonable or impossible Standards imposed on historical breeds that are already under threat. The following are comments on specific areas of the documents.

## 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 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 Standards directly relate to commercial poultry operations. They do not align with exhibition chicken rearing. As a poultry breeder I hatch considerably smaller batches of chickens, under broody hens or in incubators, and the chicks are often placed in brooders for convenience. These brooders have an artificial light source for warmth which is left on during the night for the chicks to keep warm and source feed and water.

I request that exhibition poultry be excluded from both SA 6.4 and SA 6.5 as they do not accommodate for the necessities of rearing small batches of chicks in an exhibition poultry context.

### Ammonia Levels

***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.***

As an exhibition poultry breeder I should not be required to measure ammonia levels, as I will not have ready access to the commercial equipment required, in an attempt to complying with the Standard. I should not be expected to purchase the expensive equipment to monitor such levels with the attempt to comply with an unnecessary Standard.

Ammonia levels build up when poultry are housed intensively with high stocking rates, and irregular cleaning. I do not keep poultry in the same stocking rates as a commercial operation. My fowls are typically housed in open sheds and runs in lower density stocking rates and with good ventilation. The sheds are regularly cleaned and sanitised. There has never been a need for ammonia level monitoring.

### Handling and Husbandry

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

The practice of pinioning is utilised by exhibition waterfowl breeders to prevent waterfowl from escaping. Escaped waterfowl have an adverse impact on native waterfowl, breeding with native populations, which in turn creates “mules” (sterile male & female waterfowl). It would not be possible for a Veterinarian to perform this on all hatchings as there are limited numbers of Veterinarians available willing to perform the operation and not all are accessible to all breeders. As well as being an added cost to the breeders.

Pinioning should be performed by experienced personnel. The amputation method should be performed by experienced personnel under three days of age and only by a Veterinarian with the animal under anaesthesia over three days.

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

While dubbing is not performed on all exhibition poultry breeds, there are times when it is imperative for the welfare of birds that it be carried out. There are some breeds with combs that may grow excessively large and require dubbing for health reasons.

Some breeds have a particularly argumentative nature and may damage each other when housed together, even if male and female for breeding purposes.

Exhibition poultry cannot be dubbed at day-old. It would be impractical for me or any other breeder to sex the chicks at this age and there would be no way to avoid unnecessarily dubbing the females, which is unacceptable in the show pen. It would be very counter productive and unnecessary to dub every chick.

In addition, when chicks are hatched under broody hens, not only is it impossible to sex the chicks, disturbing them at that point would be devastating. If a chick was dubbed there is a very high chance the hen would damage or even kill the chick. The broody hen must be left undisturbed to care for her chicks. Interfering in the process of natural brooding is not practical.

Given that the proposed standard does not allow for necessary dubbing due to the age limit, I request that for exhibition poultry, dubbing may be performed up to the age of 16 weeks of age which is prior to sexual maturity, and to be done by suitably skilled person. After this any dubbing should be performed by a Veterinarian.

With regard to de-spurring, this requires greater clarification. Day-old de-spurring occurs in the commercial industry only. As an exhibition poultry breeder I would not perform de-spurring as it is unnecessary. The spurs on male birds naturally grow long and sharp and require 'trimming' (not total removal), to ensure their own health and mobility, and that they are not a danger to other birds and to their handlers.

***SA9.12 - A person must use appropriate pain relief when carrying out surgical procedures on poultry.***

Clarification is required please. In Australia there are no veterinary pharmaceutical products currently registered for pain relief in poultry. If this standard applies to the procedures mentioned in SA9.10, then it would be impossible to comply with the standard.

Then poultry breeders would have to try and obtain a veterinary prescription for off-label products. This is not good practice on a national level. This would also place an undue burden both financially and practically upon me and other exhibition poultry breeders. There are very few avian vets across Queensland and they are not accessible to many exhibitors. Some clarification about what is covered by SA9.12 would assist.

Note that Part B of the Standards and Guidelines does not necessarily apply to exhibition poultry. It is evident that there has been little or no consultation with the exhibition poultry community in the development of this document.

### **Regulatory Impact Statement**

Although exhibition poultry is mentioned in the RIS, it does not account for any of the costs of the implementation of these Standards to our shows or to our breeds. There is concern about the impact of the above-mentioned changes and whether our breeder numbers will drop, and the real risk of extinction of a number of rare breeds.

It also does not account for the long-term impact on industries that are closely connected to the exhibition poultry community. Impacts may be felt by product suppliers, feed suppliers and other related retailers.

The RIS proposes some options but Option B (*Convert proposed national standards in national voluntary guidelines*) is my preferred option, unless our concerns raised in this submission can be addressed.

Thank you for the opportunity to submit our comments on the Draft Australian Animal Welfare Standards and Guidelines for Poultry and the Poultry RIS.

Yours sincerely,

W. J Patterson

Assoc. Dip. App. Sc. Animal Production