

Far North Coast All Game Club Incorporated

Supporting Australia's Game fowl Enthusiasts for over 50 years



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To: Animal Welfare Standards Public Consultation,
PO Box 5116
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Sent via email to publicconspoultry@animalhealthaustralia.com.au

From: Members of Far North Coast All Game Club Incorporated

RE: PROPOSED AUSTRALIAN ANIMAL WELFARE STANDARDS & GUIDELINES FOR POULTRY

The Far North Coast All Game Club Inc. and its members, represent one of Australia's longest running specialist game fowl breed clubs. In 2015, the club celebrated our Golden Jubilee of 50 years of operation and annually host arguably to largest collection and exhibition of game breeds at the North Coast National showgrounds in Lismore, in far northern NSW.

In 2017, we held our 50th annual show and have worked tirelessly to maintain rare and pure breeds of game fowl poultry. The welfare of our fowls is paramount to our efforts and on occasion we have cancelled exhibitions in order to preserve the welfare of our cherished poultry. It is with this passion that we wish to make a submission to the Animal Welfare Standards Public Consultation.

Specifically we would like to address the following documents as advertised for public comment by Animal Health Australia:

- a) Draft Poultry Welfare Standards and Guidelines; and
- b) Regulation Impact Statement for the Draft Poultry Welfare Standards and Guidelines

• GENERAL COMMENTS

The proposals outlined in this document have been developed without sufficient consultation with the Purebred poultry sector across Australia. Many purebred bloodstock owners only first became aware of the process with the publishing of the draft welfare standards and guidelines. Clearly there has not been sufficient advice nor discussion. The agricultural societies of Australia, who were involved largely in the consultation process to date, represent only a minute proportion of those who enthusiastically maintain these rare pure bloodstock. We humbly request that further consultation and canvassing of the impact of these draft Standards and Guidelines with entities better representing the majority of Exhibition poultry enthusiasts.

This consultation is necessary to allow thorough consideration to be given the volume of material that makes up the proposed Standards and Guidelines and would allow more representative input into the likely impacts and applicability of many of the proposed actions and regulations

- **FEEDBACK TO SPECIFIC STANDARDS & GUIDELINES PROPOSED**

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

Purebred poultry should be exempt from these standards as exhibition birds are often reared under artificial lights in rearing facilities much different to commercial operations. This nurturing is often undertaken after diligent artificial incubation and the birds are kept in small numbers relevant to the brood and in far less densities than commercial production. The continuous lighting is necessary as it provides the warmth to sustain young chicks that would otherwise not survive.

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

Exhibition poultry are often free ranging and when maintained in shedding are not kept in intensive conditions reflective of commercial operations. This being the case, purebred poultry fanciers should be exempt from complying with this standard.

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

This standard and guideline has particular relevance to our members as these procedures are undertaken to maintain the welfare and health of our stock. They are a procedure used to maintain rare purebred lines and while commercial poultry operations cull adult birds once peak production wanes, the genetic value of our birds is such that we work to maintain the health of our birds for often up to 10 years.

Specifically, we would request purebred poultry be allowed some modification to these guidelines and standards to assist the maintenance and assist the welfare of our birds. We seek the below highlighted amendments to standard as the current standard has the following potential adverse impacts to our birds:

- Dubbing of day old chicks would be detrimental to the welfare of the chicks as:
 1. The wound would be a catalyst for attack and predation by other chicks and potentially the brooding hen and
 2. Significant numbers of female chicks would be unnecessarily dubbed
 - 3.

We would propose delaying the dubbing procedure to no later than 4 months / 16 weeks and that this procedure only be carried out by experienced & accredited persons.

This would allow proper segregation of the bird following the procedure to avoid attack by other fowls and ensure avoid unnecessary dubbing of female birds as only male birds that require dubbing for welfare purposes had this procedure performed.

We would support the development of standards and guidelines for the accreditation of persons to undertake these procedures as it completely aligns with our goals to promote the welfare of our purebred poultry and the genetic capability that they maintain. We would embrace the opportunity to collaborate with Animal Health Australia in the development of this accreditation process.

- De-spurring is not undertaken generally by purebred fanciers however given the longevity of purebred poultry compared to commercial poultry, some allowance needs to be made for supporting the welfare needs of these older birds where accidental damage of spurs while foraging in adult and young male birds may require removal and/or dressing and repair of the spur to assist the bird's welfare and recovery from the injury.

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

The administration of pain relief by the appropriate person undertaking dubbing, repairing spurs or 'de-spurring' would be impractical as there are no products registered for use in poultry so permits for 'off-label' use would be required.

Additionally, accreditation of persons undertaking these procedures will further promote the welfare outcomes of purebred poultry.

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 interests be representation to better understand the likely impacts of these proposed standards and guidelines. Unfortunately, as outlined at the start of this submission, those involved in maintaining the genetic resource of pure breeds of poultry has not been properly consulted or represented during the 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 as an adverse response to the proposals. Furthermore the cost impact of compliance and maintenance of the proposed guidelines and standards has been overlooked as a result of the inadequate representation of the purebred and exhibition poultry sector.

We trust you with our concerns and look forward to further consultation to support the development of Guidelines and Standards that promote the welfare and sustainability of Australia's unique purebred poultry genetic resource.

Yours sincerely
Steve Dubber
Far North Coast All Game Club Incorporated

