



## Feather Clubs Association of Queensland Inc

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

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

The Feather Clubs Association of Qld Inc (FCAQI) is the State poultry body and represents the affiliated poultry clubs of Queensland. We support and promote acceptable welfare practices in all poultry contexts and welcome the development of these new draft Australian Animal Welfare Standards and Guidelines for Poultry.

The exhibition poultry community in Queensland are dedicated to breeding purebred poultry. This is very different to commercial poultry. Many of these breeds are historically important, rare and/or 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 size, temperament, and husbandry requirements. The community is passionate about their hobby and genuinely dedicated to ensuring a high standard of welfare and care for the breeds they hold in trust for the future.

While we are in agreement with the majority of the content of the draft, we would like to make a number of requests that we believe would make the new proposed Standards and Guidelines and the Regulatory Impact Statement (RIS) more inclusive of exhibition poultry. We 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 appear to relate to a commercial context. They do not align with non-commercial chicken rearing. Poultry breeders hatch small batches either in home incubators or under broody hens and the chicks are often placed in brooders. These brooders may be warmed by a light source, or a light source may be added to enable the chicks to seek the warmth.

We would request that exhibition poultry be excluded from both SA 6.4 and SA 6.5 as they do not cater for the requirements 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.*

Ammonia levels build up when chickens are housed densely. Exhibition poultry fanciers do not keep chickens in commercial settings where this happens. They are typically housed in open coops or runs in far lower number and with good ventilation. There is no need for ammonia level monitoring.

Exhibition poultry breeders should not be asked to measure ammonia levels as not only is there no need, but they will not have ready access to the commercial equipment required to do it to ensure they are complying with the Standard. They should not be expected to cover financial expenses associated with attempting to comply with an unnecessary Standard.

### **Handling and Husbandry**

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

Pinioning is used by exhibition waterfowl breeders to prevent some flighty breeds (eg. Mallards) from escaping and breeding with wild waterfowl populations. It would not be possible for a Veterinarian to perform this on all hatchings as there are not enough of them and they are not accessible to all 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 3 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 routine for all exhibition poultry, there are times when it is important for the welfare of birds that it be done. Some breeds have a particularly pugnacious character and will damage each other when housed together, even if male and female for breeding purposes. There are also Mediterranean breeds with combs that may grow quite large and require dubbing for health reasons.

Exhibition poultry cannot be dubbed at day-old. It would be impossible to sex the chicks and there would be no way to avoid dubbing the females. Fanciers should not be required 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 could be disastrous. The broody hen must be left alone to manage her chicks without interference. If a chick was dubbed there is a strong chance the hen would damage or destroy it. Interfering in the process of natural brooding is not possible.

Given that 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 personnel.

With regard to de-spurring, we feel it requires clarification. While day-old de-spurring occurs in the commercial industry, this does not take place in exhibition poultry. The spurs on male birds 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 their handlers.

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

We would like this clarified. There are no veterinary pharmaceutical products registered for pain relief in poultry. If this standard applies to the procedures mentioned in SA9.10, then it is not possible to comply without obtaining a veterinary prescription for off-label products. This is not good practice on a national level. It is also putting an undue burden both financially and practically upon exhibition poultry breeders. There are very few avian vets across Queensland and they are not accessible to many. Some clarification about what is covered by SA9.12 would assist.

We note that Part B of the Standards and Guidelines does not necessarily apply to exhibition poultry. It seems clear that there has been little 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, or if our rare breeds will be further at risk of extinction. 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. The FCAQI prefers Option B (*Convert proposed national standards in national voluntary guidelines*) 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,

Cathy Newton  
President  
Feather Clubs Association of Qld Inc