

Game Fowl Club of WA inc
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Submission regarding the draft Australian Animal Welfare Standards and Guidelines Poultry

The Game Fowl of Club of WA makes this submission on behalf of its members in response to the draft Australian Animal Welfare Standards and Guidelines for Poultry.

Our club is focussed on the promotion and preservation of game fowl breeds of poultry listed in the Australian Poultry Standard. It has a membership spread across Western Australia who also travel widely to support other poultry club shows held annually across the State and in the Eastern States.

Through the club there has been increased interest and participation in the breeding and showing of game fowl breeds in WA. Given WA's isolation to the Eastern States, this has helped to preserve diverse genetics of game fowl breeds in this State and increased participation and entry numbers at other club and agricultural shows.

Our club's members are passionate and devoted to the breeding and preservation of their poultry breeds and place immense importance on their poultry's welfare.

Exhibition breeders are the custodians of heritage breeds and genetics and are therefore a major stakeholder in poultry in Australia. However, the draft Standards and Guidelines for poultry appear to have ignored exhibition breeders as a stakeholder and given little consideration to the distinct differences between managing small heritage breed studs and commercial enterprises.

The documents reflect insufficient consultation with exhibition poultry breeders in the development of the draft Standards and Guidelines, despite directly affecting them.

It is essential that the exhibition poultry community's needs and practices are properly considered and accommodated to ensure the ongoing preservation of threatened heritage breeds and limited gene pools.

The draft Standards and Guidelines in its current form will impact the viability of small poultry studs and subsequently also impact the viability of specialist poultry clubs, and poultry exhibitions at agricultural shows.

It is also important to consider the social and economic effects that could result from implementing standards that adversely impact our ability to keep and breed exhibition poultry.

Exhibition poultry is a hobby enjoyed by people of all ages, but has particular benefits for young people, giving them focus and teaching them important life lessons as well as the importance and value of livestock.

For many seniors it has been a lifetime passion and the keeping of exhibition poultry gives them purpose and joy in their senior years and an opportunity to socialise and interact with their community.

Exhibition poultry breeders also form a large customer base for stockfeed agents, purchasing feeds and other poultry supplies through these family-owned and run businesses in communities across Australia.

Given all the above factors, we submit the following comments on the standards that will have the greatest impact on our members.

SA 6.4 and S.A 6.5

Both these proposed standards have only considered commercial operators. Exhibition poultry fanciers hatch and raise much smaller numbers of chicks than commercial operators and these two proposed standards are impractical to apply on small backyard breeders.

Small numbers of chicks hatched artificially at home need to be raised in small brooder boxes and require warmth. Providing a continuous light source encourages the chicks to find and huddle around a supplied heat source, which in some cases is supplied using light sources such as infrared globes.

SA 7.3

This is another proposed standard that has only considered the conditions found with commercial poultry sheds and is impractical and unnecessary to apply to exhibition poultry studs.

Exhibition poultry fanciers do not have ready access to the equipment needed to adhere to this standard and should not be required to monitor ammonia levels due to the fact they keep poultry in significantly lower densities than commercial operators and house their birds in open-fronted sheds with natural ventilation.

SA 9.10

Dubbing is currently permitted under the “Model Code of Practice for the Welfare of Animals – Domestic Poultry”, however the proposed standard has not accommodated the significant differences in flock management between commercial industries and exhibition poultry breeders.

Nor has it considered the welfare impacts of adhering to this standard on chicks hatched and reared naturally.

Our club's members dub potential breeding males on a very limited number of breeds for welfare reasons. There is no requirement to dub males for show purposes – it is solely a management and welfare practice.

There are currently 59 breeds of chicken standardised in Australia and only 6 of those breeds require dubbing for welfare reasons, with four of those being game fowl breeds – Old English Game, Australian Pit Game, Modern Game and American Game – which our club's members are devoted to breeding and preserving.

Game fowl breeds are pugnacious and extremely flighty by nature and males are particularly prone to injury and permanent damage to their combs and wattles due to their thinner, finer texture than other breeds.

Dubbing at day old would be very challenging for exhibition breeders as pure breeds of poultry are not sex-linked like commercial strains, making it difficult to accurately sex the chickens and risking unnecessarily dubbing females.

There is also serious welfare concerns in cases where chickens are hatched under hens. Many of our members prefer this method of hatching game fowls. Hens with newly hatched chicks should not be disturbed at this vital time. Mothers are prone to abandoning chickens that have been disturbed, and could damage or kill the chicks.

Dubbing some game fowl breeds is essential for their welfare and safe management, which ultimately ensures the survival of a diverse gene pool that cannot be replaced once it is lost.

Our club requests that the welfare needs of these breeds are properly considered and proposed standard SA 9.10 is amended to allow chickens up to 16 weeks of age to be dubbed. This will allow exhibition poultry breeders to accurately sex their chickens and avoid the risk of dubbing females, and avoid disturbing mother hens.

Web-marking chicks at day old is also impractical for exhibition breeders who hatch their chickens under hens. Chickens web-marked at day old are prone to grow over, thus losing vital lineage identification, and it also vital mother hens are not disturbed for the same reasons outlined above.

Our club submits that web marking should be permitted on chickens up to 4 weeks of age.

SA 9.12

There is not currently any product available specifically registered for pain relief in poultry. Products registered in other species would require being used off-

label in poultry and this would require a veterinary prescription making this standard is quite impractical for poultry.

Regulatory Impact Statement

Exhibition Poultry is specifically referred to in Part A, however there is no section in Part B relevant to exhibition poultry and the current draft standards and guidelines appear to have been drafted with a focus on commercial industries.

The regulatory impact statement gives no consideration to the cost impact the draft standards and guidelines will have on exhibition poultry breeders, clubs or agricultural shows, and does not consider the impact on heritage breed numbers or whether they will place already dwindling gene pools at further risk of extinction.

For this reason, our club prefers Option B unless the concerns of our club and exhibition poultry generally can be addressed.

Summary

We support the intent of the proposed standards to achieve improved welfare outcomes for poultry, however it is unreasonable to expect certain standards and guidelines can be implemented practically and consistently in commercial and exhibition flocks of poultry due to fundamental differences in scale, resources, management requirements and objectives.

Council local laws have had a significant negative impact on heritage poultry breed numbers across Australia over the years, therefore it is imperative that any national standards and guidelines do not further affect the ability of exhibition breeders to keep and preserve these rare and valuable breeds.

If the concerns of exhibition poultry cannot be addressed, or Option B of the Regulatory Impact Statement is not preferred, then exhibition poultry should be excluded from the standards and guidelines.

Thank you for the opportunity to submit our comments to the Draft Australian Animal Welfare Standards and Guidelines for Poultry and the accompanying Regulatory Impact Statement.

I trust our submission and those of the exhibition poultry community generally will be given proper consideration and will be accommodated.

Yours truly,
Nathan Watson
President, Game Fowl Club of WA inc