



Old English Game Fowl Club of Australia Inc.



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Old English Game Fowl Club of Australia
Tim Polley, President
291 Tea Tree Rd,
Brighton, TAS 7030

SUBMISSION: Draft Welfare Standards and Guidelines Poultry

To whom it may concern;

On behalf of the Old English Game Fowl Club of Australia Inc and its members, we wish to make a submission to 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

The Old English Game Fowl Club of Australia Inc will celebrate its 30th anniversary in 2019 and since its inception has remained focussed on promoting and preserving this ancient breed of poultry for the sole purposes of exhibition.

We have a membership list from every State and Territory who are devoted to the breeding and exhibition of Old English Game fowls and bantams, and hold an annual national show with an entry of between 800 and 1,200 birds, making us one of the largest specialist poultry clubs and shows in Australia. We also support shows all around Australia.

Unlike the commercial poultry sectors, our members keep poultry not for commercial priorities but for a genuine love of poultry keeping and a desire to maintain pure and heritage genetics. As such, they are devoted to their birds and hold the welfare of their poultry in the highest regard.

Given the time and money they spend on their birds, our members implement good management and husbandry practices that ensure their flocks are maintained to a high standard of health and welfare. This is critical to ensure their birds are shown in healthy, fit condition and can breed successfully and consistently to a high exhibition quality.

With the welfare of our birds always front of mind, Animal Health Australia's draft welfare standards and guidelines for poultry, and the supporting regulation impact statement, are of significant interest to our club.

While we hold interest in the draft welfare standards and guidelines generally, some of the draft standards are unreasonable and in some instances impossible to place on exhibition poultry breeders.

Reviewing all the relevant documents associated with the Standards and Guidelines for Poultry, it is clear there has been insufficient consultation with the exhibition poultry community in the development of these documents. As a major stakeholder that will be directly affected by these standards and guidelines, the needs of the exhibition poultry community needs to be properly considered and accommodated. This is vital to ensure the preservation of threatened heritage breeds with limited gene pools.

Our submission focuses on several aspects that will have the greatest impact to the preservation and welfare of the breeds that are bred and exhibited by our members across the country.

1. Draft Standards and Guidelines

We submit the following requests and comments:

S.A 6.4: A person in charge must ensure poultry and 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.

S.A 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.

Comment: Exhibition poultry must be excluded from these requirements. It appears S.A 6.4 and S.A 6.5 relate directly to the commercial poultry sector and are therefore unreasonable to impose on fanciers who hatch small numbers of chickens at home. Exhibition fanciers use brooders to care and raise chicks until they are old enough to be placed in adult pens. Chickens need continuous warmth during the early stages of life and a light source is used in these brooders to encourage them to seek the heat-source.

S.A 7.3: 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.

Comment: This proposed standard again appears to relate to the commercial poultry sector where chickens are often densely stocked in enclosed sheds. It has no relevance to those who keep exhibition poultry and our members should not be required to monitor ammonia levels as they house their birds at much lower density and in open-fronted, naturally ventilated sheds.

S.A 9.10: A person must only perform desnooding, dubbing, despurring and web marking on day old hatchlings selected as potential breeders.

Comment: The Australian Government in the "Model Code of Practice for the Welfare of Animals – Domestic Poultry" permits the dubbing of poultry.

The Australian Poultry Standards, which sets out the standards for the breeding, exhibition and judging of Old English Game, does not state any requirement for males to be dubbed for exhibition. It acknowledges that dubbing is a customary practice, which has been carried out in many countries (in some since the 19th century), however this is a welfare custom to prevent damage to the combs and wattles of male Old English Game.

Our club's members only perform dubbing of breeding males for these welfare reasons.

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

It is common for Old English Game males to tear their combs and wattles from squabbling with flock mates from a very young age, aggression from breeding females when paired, and a number of other external forces.

Injuries to the headgear cause long-term damage, risk infection, and can cause significant stress to the bird, even death in extreme cases. Damaged headgear also renders the bird unsuitable for showing purposes as the comb and wattles are judged on their quality and condition.

For these reasons, many breeders and exhibitors of Old English Game carefully perform dubbing to remove headgear damaged during the growing stage, or to prevent the bird from suffering injury during adult life.

Performing this procedure at day old is much more challenging for exhibition breeders than the commercial industry, as chicks of exhibition breeds are not sex-linked like commercial strains. This makes it difficult to accurately sex the chickens and risks unnecessarily dubbing females.

Dubbing chickens at day old also raises welfare implications in cases where chickens are hatched under hens. Disturbing the chickens and hens at this vital time is of serious welfare concern to our members, as many practice natural incubation and brooding. Mothers are prone to abandon chickens that have been disturbed, and could damage or kill the chicks.

There is substantial reason to dub Old English Game, as it is unequivocally essential to their welfare and ultimately the survival of a diverse gene pool within the breed. Our club thereby requests an amended proposal for the regulation of dubbing, in line with the “Principles for poultry welfare” outlined on Page 12 of the Draft Standards and Guidelines document which states:

“Adherence to good animal husbandry principles is essential to meet the welfare requirements of animals. Good husbandry principles ... of poultry include:

- *procedures to minimise the risk of pain, injury or disease; and*
- *undertaking any management procedures required for planned bird management in a manner that reduces the impact of these procedures and minimises the risk to poultry welfare”.*

For exhibition poultry, we propose dubbing should only be performed by an experienced person and must be performed on chickens less than 16 weeks of age selected as potential breeders. This will allow our members to accurately sex their chickens at home, avoid the risk of dubbing females, and avoid disturbance of mother hens.

Males under 16 weeks of age have immature comb and wattle development. This allows dubbing to be performed more easily and with significantly less invasion than in an adult male, thus preventing injury and damage to the headgear as the birds reach maturity.

Regarding web marking, this is usually done at a later age. Chickens web-marked at day old are prone to the web marking growing over, thus losing vital lineage identification. Again, it is also vital mother hens are not disturbed when the chickens are in the first stages of life. Several weeks of age would be a more appropriate age cut off for web marking.

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

Comment: Clarification of what surgical procedures apply to this requirement is needed. There is no product currently available that is specifically registered for pain relief in poultry. Pharmaceutical products registered in other species would need to be used off-label and require a veterinary prescription. This is not good practice and would be impractical and expensive for exhibition fanciers.

2. Implementation of standards

As outlined in the Regulation Impact Statement for the Draft Poultry Welfare Standards and Guidelines, our club recommends adoption of:

Option B: convert the proposed national standards into national voluntary guidelines (the minimum intervention option) in addition to the base case.

Page 7 of the Draft Poultry Welfare Standards and Guidelines states “it is then a policy decision for each state and territory jurisdiction to implement the poultry standards in legislation as they see fit.”

If any option other than Option A or our preferred Option B is adopted, this is likely to result in inconsistent adoption of the standards between states and territories. The risk of inconsistent adoption between States and Territories has already been highlighted by the State Government of Western Australia’s public statement that it will not adopt the draft standards and guidelines for poultry if its welfare concerns regarding the caged egg industry are not met.

Further, the Regulation Impact Statement does not account for the costs to exhibition poultry of implementing these new standards, even though it is expected to apply to exhibition poultry. These new

standards and guidelines could have immense impact on the viability of many small studs of heritage breeds. This could further reduce already limited heritage breed gene pools and place these threatened breeds at further risk of extinction in Australia. Loss of breeds and fanciers would also impact the viability of poultry clubs and poultry exhibitions at agricultural and royal shows across the country.

Australia is lucky to have a group of dedicated fanciers that have preserved many poultry breeds to an extremely high standard despite the tight restrictions on imports. Old English Game in Australia are considered by many among the highest quality in the world and every step should be taken to retain and preserve this ancient breed in this country.

We trust our comments will be duly considered and that through the submission process the needs of exhibition poultry breeders and the impact on exhibition poultry will be considered and addressed with greater importance.

If not, then exhibition poultry should be excluded from the document, as it is heavily favoured towards the practices of the commercial sector with little to no regard for its impact on studs of exhibition poultry, poultry clubs and shows.

Yours Sincerely

Tim Polley
President, Old English Game Fowl Club of Australia Inc