

Tenterfield Poultry Club Inc.



12 February 2018

Animal Welfare Standards Consultation

PO Box 5116

BRADDON ACT 2612

Email: publicconspoultry@animalhealthaustralia.com.au

Dear Sir

RE: Submission on Proposed Draft Australian Animal Welfare Standards and Guidelines - Poultry

The Tenterfield Poultry Club's submission is that:

1. In the *Proposed Draft Australian Animal Welfare Standards and Guidelines - Poultry*, Standards SA9.9 and SA9.10 (page 30) are ambiguous. While Clause SA9.9 says that a person must not perform desnooding or dubbing, this directly contradicts Clause SA9.10 which says it can be performed (on day old hatchlings).
2. In the *Proposed Draft Australian Animal Welfare Standards and Guidelines - Poultry*, Standard SA9.9 says that a person must not perform desnooding or dubbing for cosmetic purposes on poultry. The Tenterfield Poultry Club respectfully suggests that desnooding or dubbing should be allowed, but only for therapeutic reasons. Older birds can have their eyesight and movements restricted by the weight and size of their combs and wattles to the point where the size of the comb can cause starvation and dehydration resulting in death. Therapeutic desnooding or dubbing would significantly increase their quality of life.
3. In the *Proposed Draft Australian Animal Welfare Standards and Guidelines - Poultry*, Standard SA9.10 says that a person must only perform desnooding, dubbing, despulling and web marking on day old hatchlings selected as potential

breeders. Tenterfield Poultry Club respectively suggests that while this may be applicable to commercial breeders with high numbers of poultry, it does not reasonably apply to exhibition poultry breeders who normally only have very low numbers of individual breeds. Exhibition poultry breeders would not carry out selection of fowl for breeding purposes until the fowl are fully mature and their characteristics can be assessed against specific breed standards. At the very least, desnooding or dubbing would not be carried out until the age of fourteen to sixteen weeks when the sex of the fowl should be more obvious.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'D Collier', with a stylized flourish at the end.

Darren Collier

PRESIDENT