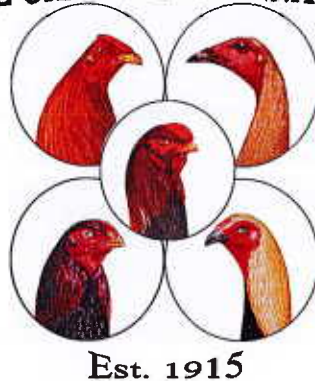


ALL GAME CLUB of S.A. Inc.



21st February 2018

Animal Welfare Standards Public Consultation
PO Box 5116
Braddon, ACT 2612

SUBMISSION: Draft Welfare Standards and Guidelines Poultry

To whom it may concern;

The All Game Club of South Australia Inc would like to make a submission on the following documents:

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

The All Game Club of South Australia Inc has a proud history of over 100 years focussing on the promotion and preservation of Breeds of Poultry (more specifically game birds) for the sole purposes of exhibition and maintenance of these pure breed breeds.

We as exhibitors are very interested in the proposed outcomes of the Draft documents as the documents currently seemed aimed at commercial poultry keeping. Exhibition poultry are kept in a very different manner with a very different outcome for the bird in mind. Unlike the commercial poultry our members keep poultry not for commercial gains but for a lifetime hobby/love of poultry keeping. We are devoted to our birds and hold their welfare in the highest regard. Put simply we invest a lot of time and money into the production of the highest possible quality show poultry, if the correct husbandry practices are not followed birds are not in prime condition and hence, not competitive within the show environment. Therefore, we have completely different requirements. We don't have large poultry sheds, enclosures or brooding houses, we

are on a much smaller scale and therefore have vastly different management needs and practises.

We have reviewed all the relevant documents associated with the Standards and Guidelines for Poultry. We see ourselves as a stakeholder that will be deeply affected by these standards and guidelines. We therefore urge you to consider the submissions we make.

Our submission has a focus on a number of aspects that will be detrimental to our ongoing existence.

Draft Standards and Guidelines

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.

Submission: Exhibition poultry should be excluded from these. As it appears S.A 6.4 and S.A 6.5 relate directly to the commercial poultry sector and therefore do not pertain to the exhibition poultry keeper which only hatch small numbers of chickens. Exhibition poultry keepers use small brooders to care and raise chickens until they are old enough to be placed in more appropriate pens. Chickens need continual warmth provided during the early stages of life - a heat source is used in these brooders in place of a hen's body heat.

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.

Submission: This proposal clearly relates to commercial poultry where chickens are densely stocked in enclosed sheds. It has no relevance to those who keep exhibition poultry as we have completely different condition we should not be required to monitor ammonia.

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

Submission: 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 Game Fowl, doesn't require males to be dubbed for shows. It recognises that dubbing has been a traditional practice for hundreds of years, which has been carried out in countries around the world.

It recognises that this has been a welfare practice to prevent damage to the combs and wattles of male game fowl.

Game fowl males are inclined to scrap and fight in pens and yards as they grow up, therefore they are prone to injury and can damage to their combs and wattles, which may cause them to become permanently damaged and unsuitable for showing/breeding. Fighting amongst young males can cause death or serious injuries if combs and wattles are not removed.

Many breeders and exhibitors carefully perform dubbing to remove the combs and wattle. This is normally preformed by an experience exhibitor giving little discomfort to the fowl.

Performing the procedure at day old while possible would seem unpractical for exhibition breeders, as they would not be able to accurately sex the chickens at such a young age. Every chicken is a potential breeding fowl, so the exhibitor would need to dub every bird and therein be dubbing females as well. Dubbing at day old would also not guarantee that it will be as effective for the reasons above as the bird develops.

We also hatch chickens under hen, which bring about another set of issues at that age. Disturbing the hen and chickens at this vital time would cause abandonment of the hen from her chicks. Some game hens are known to kill their chickens if disturbed in the early weeks. Therefore, this section of the draft could cause husbandry issues for game fowl at various levels.

Our club therefore would submit 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 within 16 weeks of age, where the bird is selected as a potential breeding bird. This will reduce the perceived problems mentioned above.

Males under 16 weeks of age have immature comb and wattle development. This allows dubbing to be performed more effectively with the least discomfort as opposed to a fully mature male with matured comb and wattles.

Regarding marking of webs, this can be done at day-old hatchings in an incubator, however if done at a later age on chicks hatched under hens it will prevent the issues indicated above.

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

Submission: A clarification of what is meant by “surgical procedures” should apply to this. There is no registered product currently known that is available to exhibitors for pain relief in poultry. There are pharmaceutical products registered for other species which require a veterinary prescription. This would be very impractical and expensive for any exhibition of poultry.

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.”

We preferred Option B as the option, as we wouldn't like to see an inconsistent standard between states and territories. There are already issues of inconsistency between States and Territories and a consistent document regarding poultry standards and guidelines for poultry is preferred.

It also appears the RIS has not accounted the costs associated to exhibition poultry if implementing these new standards. It is clear that little understanding of the ramification of the proposed Drafts on exhibitors has been taken into account. It has been very difficult on our members and exhibitors over the past 20 years as local laws were passed which made the keeping of exhibition poultry very difficult. We have many rare breeds shown at our club which will become extinct in Australia without amendments to the Drafts.

We trust that our submission will be taken into account for duly consideration and the bills passed will be supportive of exhibition poultry not destructive.

Yours Sincerely

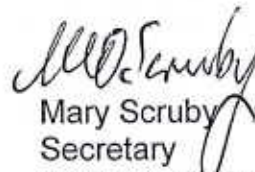
On behalf of the All Game Club of South Australia Inc



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