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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

Central Queensland Poultry Club has members which have raised significant concerns on the new proposed Welfare Standards and Guidelines and the current practices of raising and exhibiting poultry.

As a Club we would like to respond to the proposed changes; our members keep a range of heritage breeds and species which varied requirements for husbandry and welfare, as well as the mixed temperaments requiring different housing requirements that is very dissimilar to commercial flocks. Our members are dedicated to preserving some of the rarest and historically important breeds and are passionate about maintaining a pool of genetics which is the basis for all commercial breeds used today.

As a club we would like to respond to the following 5 statements and request that they are considered to include exhibition poultry and represent the welfare requirements of these birds.

- 1. 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.**
- 2. 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.**

Both SA6.4 AND SA6.5 are not applicable for non-commercial poultry breeders. Exhibition breeders generally hatch small numbers of chicks and these are typically reared in brooders with a light as a source of heat 24 hours a day until chickens are old enough to generate enough body warm to survive. This source of heat is particularly important when low numbers are hatched.

It is Central Queensland Poultry Club's request that non-commercial poultry breeders be excluded from this part of the standard as the heat source is crucial to the chickens for the first stages of life.

3. 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

Exhibition poultry are housed very differently to commercial poultry and typically as birds are bred for the exhibition therefore hygiene and care of the birds is paramount to keep them in the best condition, this involves using a much lower stock density. With the lower stock density comes lower ammonium levels, also the type of housing used is typically different with open cages with free airflow, this ensures ammonium levels are far lower.

It is Central Queensland Poultry Club's request that we be excluded from this part of the standard as exhibitors would not have access to the commercial grade equipment required to monitor ammonia levels and would not have a requirement to do so as the ammonia levels would be extremely unlikely to exceed the threshold.

4. SA9.10 - A person must only perform de-snooding, dubbing, de-spurring and web marking on day old hatchlings selected as potential breeders.

Dubbing of poultry is not standard for all breeds of exhibition poultry, however some breeds require this process to be done due to their breed character and health reasons. Some breeds particularly Hardfeather poultry are very aggressive and even when paired in breeding pens females can be aggressive enough to damage male birds head gear, this could result in infections, excessive blood loss and possible loss of the bird. Other breeds to be considered are the Mediterranean breeds, where male birds that naturally have large bulky combs which can affect the health of the bird as it ages and tends to fold over obstructing its view and ability to find feed and water.

Dubbing of chicks at day old is not a viable option as it would include all birds to be dubbed females included as the sex cannot be determined at a day old. Fanciers that use natural incubation methods of a broody hen would find this process impossible as the chicks would have to be disturbed and then put back under the mother post dubbing, at which point the hen would be more likely to pick at the wound site, reject the chicks or even kill them.

It is Central Queensland Poultry Club's request that the dubbing of poultry restrictions be extended to the age limit of 16 weeks for exhibition poultry and the dubbing to be done by competent personnel.

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

To our knowledge there are no products currently available for poultry to provide pain relief for surgical procedures, most products used are off-label with no proven effectiveness. It is not good practice to be using off label products as the side effects will be unknown.

It is Central Queensland Poultry Club's request that we be advised on what veterinary products that there are available, given there are so few avian vets practicing in this area.

6. Regulatory Impact Statement

The impact of these Guidelines will be far reaching and even though the exhibition poultry is mentioned we feel it is not included. It does not account for the impact that this will have on declining numbers of rare breeds and the impact on the genetics of pure bred poultry, loss of breeders, the decline in shows and club members, the effect on the local area through feed suppliers, product suppliers, vets and specialist transport companies.

The RIS has proposed some options. With consultation of our club members and discussion on the points above Central Queensland Poultry Club prefers option B (B Convert proposed national standards in national voluntary guidelines).

The Central Queensland Poultry Club would like to thank you for the opportunity to be able contribute to the draft Australian Animal Welfare Standards and Guidelines for Poultry

Yours sincerely,

Terry Taylor
Central Queensland Poultry Club Inc.