

Exhibition Stud Poultry Australia Inc

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21st February 2018

Animal Welfare Standards Public Consultation
PO Box 5116
BRADDON ACT 2612

To Whom It May Concern,

RE: SUBMISSION FROM EXHIBITION STUD POULTRY AUSTRALIA INC PERTAINING TO DRAFT AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES FOR POULTRY AND THE POULTRY REGULATORY IMPACT STATEMENT

Exhibition Stud Poultry Australia Inc (ESPA) welcomes the opportunity to comment on the Draft Australian Animal Welfare Standards and Guidelines for Poultry (*Standards and Guidelines*) and the Poultry RIS (*RIS*). ESPA is the peak exhibition poultry representative body in Australia. ESPA's operation is based on delegates from each of the State/Territory exhibition bodies (or nominees) and an elected executive (President, Vice-President and Secretary). ESPA's executive consists of President - Professor Kevin Smith, Vice-President - Dr Brendan Sharpe and Secretary - Mrs Cathy Newton.

The poultry fancy (represented nationally by ESPA) are genuine poultry enthusiasts in that we keep poultry for pleasure (we are not commercially motivated) and we are passionate about the preservation of heritage and historically important breeds of poultry. Central to this is commitment to poultry welfare by fanciers. For this reason the fancy welcomes the premise of setting national welfare standards for poultry.

It is important to note that ESPA was not invited to partake in the initial advisory process which led to the development of the *Standards and Guidelines*. Whilst exhibition poultry was partly represented in this initial process via the delegate from the Federal Council of Agricultural Societies, exhibition poultry has largely been under-represented because agricultural shows only represent a minor portion of all poultry exhibitions in Australia. The concerns that we raise associated with the *Standards and Guidelines* and the *RIS* could have been raised at a much earlier stage in this process if we had been represented at the advisory level.

On behalf of the Australian exhibition poultry fancy, ESPA raises a number of concerns relevant specifically to the *Standards and Guidelines* and the *RIS* as set out in the subsequent sections of this submission.

ESPA would welcome further consultation in adapting the *Standards and Guidelines* to be more inclusive of exhibition poultry. Exhibition poultry has been clearly included as an entity in Part A of the draft document, yet exhibition poultry is the only included entity to not have an associated

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section in Part B. It is thus clear that to date consultation with the exhibition poultry fancy has been insufficient.

Standards and Guidelines

Relevant to Section 6 - Lighting

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.

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.

The standards 6.4 and 6.5 do not account for husbandry requirements for small batches of chickens hatched in incubators which are then reared initially in brooding boxes. In these non-climate controlled situations (as opposed to commercial rearing sheds) chickens need to be able to seek warmth. A heat source (most commonly heat lamp) is provided in conjunction with a continuous light source in order for the chickens to be able to seek the warmth. Once the chickens have learnt how to seek warmth from the heat lamp the light source is removed (usually by 5-7 days of age). Thus, ESPA requests that exhibition poultry be excluded from 6.4 and 6.5 or they are re-written to accommodate the husbandry requirements of rearing small batches of chickens.

1. Relevant to Section 7 – Temperature and Ventilation

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.

The premise of this standard is commercial poultry keeping practices whereby chickens are stocked densely and typically in enclosed sheds. Exhibition poultry fanciers should not be expected to monitor ammonia levels given that birds are stocked at significantly reduced densities compared to commercial poultry and are housed in open-fronted sheds with natural ventilation. Ammonia levels in commercial sheds are a factor of high stocking density, poor litter quality and under-ventilation. Exhibition breeders would not have ready access to equipment required to ensure adherence to the standard nor should they be expected to incur the expenses associated with compliance given the commercial premise of the proposed standard.

2. Relevant to Section 9 – Handling and Husbandry

SA9.8 – A person other than a veterinarian must not perform pinioning, castration or devoicing, on poultry.

Pinioning is performed to prevent some flighty breeds of waterfowl (eg. Mallards) from escaping and breeding with wild waterfowl populations. It is unrealistic to expect that a Veterinarian perform this on all hatchlings. Rather, it should be performed by experienced personnel. Availability of suitably experienced avian Veterinarians in Australia is quite low. We suggest the amputation method be performed by experienced personnel under three days of age and by a

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Veterinarian under anaesthesia is the animal is over three days. Pinioning via tendonectomy at any age should only be performed by a Veterinarian with the animal under anaesthesia.

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

Dubbing and toe-web marking are invariably performed on potential exhibition poultry breeding stock.

In relation to dubbing, whilst it is not customary, in some cases it is necessary for welfare reasons in some breeds for example in Mediterranean breed males as their combs can become too large affecting the bird's general health, or in game chickens to prevent damage to head gear due to their pugnacious attitudes during rearing. The proposed standard thus has welfare implications for exhibition poultry as the exhibition poultry fancy does not have the capacity to sex chickens at day-old. Given that all chickens are potential breeders and show birds, the proposal to restrict dubbing to day old birds creates some welfare and husbandry issues for exhibition breeders. The dubbing of females is unnecessary. Furthermore, as a reasonable portion of chickens are hatched under hens (ie. naturally), dubbing chickens at hatch poses a welfare concern as the chickens and mothers would be disturbed at this vital time. Thus, in relation to dubbing, ESPA proposes that for exhibition poultry, dubbing is to be performed by 16 weeks of age (prior to maturation of the head gear) and by experienced personnel.

In relation to toe web marking, this is typically performed at day-old on chickens hatched in incubators; however, may be performed later in chickens hatched under hens. It is important that chickens hatched under hens are not disturbed in the first week of life. Seven days of age would be an appropriate age cut-off here. Thus, in relation to toe-web marking for exhibition poultry, ESPA proposes that seven days be the cut-off age by which toe-web marking must be performed.

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

This proposed standard requires more clarity. As it is currently written it proposes that all surgical procedures (including those listed in SA9.10) require pain relief, ie. it potentially mandates the use of pain relief for all chickens hatched in commercial hatcheries or other (including exhibition poultry) undergoing de-snooding, dubbing, de-spurring and toe-web marking (these are all surgical procedures). This is not feasible. Furthermore, there is not a veterinary pharmaceutical product registered for pain relief in poultry in Australia. Thus compliance with this standard is not possible without obtaining veterinary prescriptions for the off-label use of formulations for pain relief. This approach should not be promoted.

Regulatory Impact Statement (RIS)

In relation to the RIS, ESPA makes the following comments:

- The RIS does not account for costs to the agricultural show movement based on the impacts pertaining to proposed standards as outlined in our submission above.

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- The RIS does not account for the long-term implications to the poultry industries if heritage breed numbers deteriorate based on the impacts of proposed standards as outlined in our submission above.

From the RIS, ESPA prefers Option B (*Convert proposed national standards in national voluntary guidelines*) over Option C until such point that the concerns raised in our submission can be adequately addressed.

We appreciate the opportunity to submit our comments on the Draft Australian Animal Welfare Standards and Guidelines for Poultry and the Poultry RIS.

Yours sincerely,

Dr Kevin Smith
President
Exhibition Stud Poultry Australia Inc