

CASINO POULTRY CLUB Inc.



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To: Animal Welfare Standards Public Consultation,
PO Box 5116
BRADDON, ACT, 2612

Sent via email to publicconspoultry@animalhealthaustralia.com.au

From: Members of Casino Poultry Club Incorporated.

RE: PROPOSED AUSTRALIAN ANIMAL WELFARE STANDARDS & GUIDELINES FOR POULTRY

Casino Poultry Club Inc. is a fairly new Poultry Club on the Northern Rivers of NSW. We hold two poultry shows per year. Our members, some with many years in poultry and others are newcomers to the Fancy, work to promote and encourage the breeding and exhibition of pure breeds of poultry on the Northern Rivers area of NSW. The health and welfare of these poultry are very importance to the breeders and fanciers in the area and have had to cancel several of our Shows in recent years with disease outbreaks in commercial flocks that have stopped the transporting of poultry. With this in mind we make this submission to the Animal Welfare Standards Public Consultation.

The areas we specifically would like to address are:

- 1) Draft Poultry Welfare Standards and Guidelines; and
- 2) Regulation impact Statement for the Draft Poultry Welfare Standards and Guidelines.

❖ **GENERAL COMMENTS**

The proposals outlined in this document have been made with the Purebred Poultry fanciers having little or no advise or input into the decisions made. The Agricultural Societies of Australia who were involved largely in the consultation process to date represent a minute part of those fancier that breed and maintain these genetically significant rare breeds of poultry. As a life member of the local agricultural societies and overseer of the Poultry section at our shows, I have not seen any communications on these Draft Standards and Guidelines. The representation would be held with entities that better represent the majority of Exhibition Poultry organisations (i.e. the state and national Exhibition Poultry bodies.)

This consultation is necessary given the volume of material involved in the make-up of the proposed Standards and Guidelines and would allow more representative input into the possible impacts on the genetic pool for the rare and sometimes endangered breed and varieties of pure breed poultry that many of the proposed actions and regulations may have.

❖ FEEDBACK TO SPECIFIC STANDARDS AND GUIDELINES PROPOSED

S.A.6.4 and S.A.6.5- Relating to continuous light exposure to poultry.

Purebred poultry should be exempt from these standard as young chicks that have been hatched via artificial incubation are often reared under artificial lighting as a heat source to sustain the warmth necessary to keep them alive. This form of brooding is usually performed in very small numbers (usually under 50) and in much lower densities when compared to commercial brooding.

S.A. 7.3- Relating to monitoring of ammonia levels in sheds.

As purebred poultry are usually kept in small numbers and low-density penning, often free ranged for part or all day, they should be exempt from this requirement.

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

This standard and guideline has the most relevance to exhibition poultry breeders particularly game breeders as the procedure of dubbing is carried out to maintain the health and welfare of the stock. Most commercial birds are culled as their production levels fall generally at two to three years whereas purebred poultry are often kept for longer periods (up to 10 years) to preserve the genetic value of these sometime rare & sometimes vulnerable bloodlines. To do this the health and welfare of these birds is vitally important. Birds kept for breeding must be healthy and not stressed.

We suggest modifications be made to the standards and guidelines that are specifically to assist in maintaining these valuable bloodlines. We seek the following amendments to the guidelines.

- **Dubbing of day old chicks** would be detrimental to the welfare of the chicks as;
 1. Dubbed chicks would be vulnerable to attack from other brood mates and broody hens for those hatched naturally under hens. Handling of chicks at day old can also increase the stress levels on chicks and hen & cause hens to abandon a hatch.
 2. As a result of the difficulties in sexing chicks at day old, large numbers of female chicks that don't need be dubbed would now be dubbed.

The proposal is to delay the dubbing procedure to no later than 4 months/16 weeks and that it be performed only by experienced and accredited persons.

This would allow for the dubbed birds to be separated from others to allow for proper healing and prevent attacks by other fowls. It would also ensure that no females were unnecessarily dubbed, and males are only dubbed for welfare reasons.

Our Club would support the development of appropriate standards and guidelines for such accreditation of person to carry out these procedures as this is completely along the lines of our goals to promote the welfare of exhibition poultry and the maintenance of their genetic viability. We would be happy to work with Animal Health Australia to develop this accreditation process.

- **Despurring** is not generally done by poultry exhibitors except for the occasions where an adult bird is injured accidentally whilst foraging. This may require the repair and dressing of the damage and sometime the removal of the spur depending on the extent of the injury, but only to assist the birds' welfare in its recovery.
- **Toe marking** is generally carried out at day old if chicks are hatched artificially, but as pointed out earlier if chicks are hatched naturally (i.e. under a hen) this can cause undue stress to both hen and chicks. A suggested cut off time of one week would alleviate this problem.

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

As there are no registered product for administration to poultry for pain relief the use of an “off label” product would be required. This would be impractical as permits would be required every time a product was obtained, particularly in the case of accidental injury to a spur or such. The time taken to obtain such a permit and then source the product would surely cause more stress to the injured bird.

Regulation Impact Statement (RIS) upon Poultry in Australia

We note that in Section 1.4 “Consultation Processes” that the aim must be for purebred and exhibition poultry breeders’ interests to be represented to better understand the likely impacts of these proposed standards and guidelines. Unfortunately, as outlined earlier in this submission, those involved in maintaining the genetic resource of rare and often vulnerable pure breeds of poultry has not been properly consulted or represented during this process leading to the development of this proposed “Australian Animal Welfare Standards and Guidelines for Poultry”. As a result, the RIS does not consider the impact to the Australian poultry industry if the pure breed genetic resource was to be depleted by adverse responses to the proposals. Furthermore, the cost impact of compliance and maintenance of the proposed standards and guidelines has been overlooked as a result of the inadequate representation of the purebred and exhibition poultry sector. Each state has a peak body that represents the exhibition poultry associations in their state and a National body, any of these could and should have been included in all discussion on the proposed Standards and Guidelines.

As members of the group of people entrusted with the protection and welfare of the pure breed poultry genetics, we hope you will consider our submission of our concerns and look forward to furthering consultation in an effort to the development of Standards and Guidelines than promote the furtherment of the sustainability and welfare of all poultry (including Exhibition Poultry) in Australia.

Yours sincerely

Eric Rosolen
Secretary
Casino Poultry Club Inc.