

Erin Callow

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Animal Welfare Standards Public Consultation

Po Box 5116

Braddon ACT 2612

To Whom It May Concern,

Public consultation for the draft Animal Welfare Standards & Guidelines for Poultry.

I'm a poultry fancier. My passion is breeding and exhibit Australian Pit Game bantams and Large, Old English Game Bantams but I also keep a few other breeds. Members of my family have been influential breeders of Australian Pit Game and Old English Game for some 50 years or more. I have been an active member of the poultry community for over 10 years.

I comprise my thoughts from my personal experience owning, breeding, exhibiting poultry. I am an advocate for the promotion of purebred poultry through my voluntary involvement with Clubs. I run the poultry section for my local show society which holds a school education Day and poultry show. As an exhibitor it's imperative to me that my fowl's welfare takes priority.

Standards and Guidelines

SA6.4 – “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 hot weather.”

SA6.5 – “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.”

- This is not realistic for the general public that might raise chicks in brooders. Most brooders available on small scale to the general public use a light for its sole heat source.

Handling and Husbandry

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 some breeds is in the bird’s best interests.
- In males of particular breeds the Straight comb can grow extremely large. Resulting in the bird’s quality of life being affected. The weight of the comb begins to weigh the birds head down, hindering him from being able to eat, drink and socialise with the flock. It can also fold over the head preventing the fowl from seeing.
- Large Straight Combs often become injured in pens, get caught in wire and can result in the bird bleeding to death. Blood from bleeding birds can often trigger the remaining flock to attack the injured bird.
- Large Straight Combs in pugnacious breeds should be removed to avoid injury from squabbling within the flock.
- The Australian Poultry standard recognises a good number of comb shapes. The Straight comb having a surface area 5 to 10 times larger than any other comb. Thus proving that such a large surface is not required to maintain the bird’s health.
- Birds with large straight combs left intact DO NOT cope well in extreme heat or extreme cold compared to those that have been dubbed. Resulting in many birds with large straight combs perishing in heatwaves and times of frost. Australia has many regions where weather is so diverse throughout the year. Some locations experiencing in excess of 40 degrees during summer and well in the minuses during winter.
- Dubbed fowl are less likely to suffer from diseases spread by mozzies. As the comb surface area for the insect to bite is greatly reduced. Those that may contract fowl Pox recover much faster and are even less likely to suffer from secondary infections from open sores on the comb.
- Birds left with large combs often lack fertility and have a greatly reduced lifespans. And are usually deceased within 4-5 years. Dubbed fowl of these same breeds often highly fertile and living productive lives for 8-10 years or more.
- In the US, dubbing of cockerels as one of the acceptable procedures that may cause short-term stress but which are necessary for the long-term welfare of the flock.
- Dubbing chicks hatching under hens could have catastrophic ramifications particularly in the case of pugnacious breeds. Hens may damage, abandon and are very likely kill the returned chicks.
- Commercial methods of sexing is not applicable across all breeds of poultry. This would lead to the unnecessary dubbing of females who do not develop the large straight combs that males do.
- While there is a need to have poultry standards and guidelines. To maintain the welfare and longevity of these breeds, Dubbing of fowl should be acceptable up to the age of 16 weeks of age, which is prior to sexual maturity, and to be done by experienced personnel.

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

- There is no current registered veterinary product for pain relief in poultry. It would be considered poor practice for veterinarians to prescribe an off-label product without knowing the possible future ramifications of the fowl’s health, egg production and if eggs and meat are still suitable for human consumption.
- As the general breeding season takes place over several months it’s not practical for some isolated rural hobby breeders to visit a veterinary clinic for each time they hatch a clutch.
- Availability of specialised bird veterinarians is extremely limited. I believe Queensland only having 2 or 3 operating within the state.
- When dubbing is performed by an experienced person with clean sharp surgical scissors. It is quick, the birds return immediately to the yard with no signs of distress and carry on normally foraging for food as though nothing has happened.

I feel that the current draft focuses muchly on commercial poultry and doesn’t cater for situations that everyday poultry keepers face, in particular that of Game breeders. I ask that our views be heard and the draft be modified accordingly to cater better for those Game and Mediterranean breeds that will be negatively impacted by these current drafts.

Yours truthfully

Erin Callow