



9th February 2018

To Australian State Poultry Bodies:

As the Standards and Guidelines in Part A apply to exhibition poultry, Gawler Districts Poultry Fanciers Assoc. Inc. wish to submit the following comments on the Australian Animal Welfare Standards and Guidelines for Poultry & the Poultry Regulatory Impact Statement.

The Australian Animal Welfare Standards and Guidelines for Poultry document has two parts: Part A – general standards and guidelines that apply to all poultry and Part B – specific standards and guidelines for each species of poultry (except exhibition poultry). Because of the diversity of species and breeds, Part B Standards and Guidelines do not necessarily apply to exhibition poultry.

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.

GA6.4 Lighting should be managed to avoid sudden changes in light intensity.

Comment: Exhibition poultry should be excluded from this due to the need to maintain chickens if hatched via artificial incubation. Especially in the first few weeks of life, chickens need to seek warmth via the provision of a continuous light & heat source in brooding boxes.

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.

Comment: Commercial poultry are stocked densely and usually in enclosed sheds. Exhibition Poultry are stocked at significantly reduced concentrations in open-fronted sheds with natural ventilation and should not be expected to monitor ammonia levels. Exhibition Poultry Fanciers would not have ready access to equipment to monitor ammonia levels to ensure adherence to the standard is enforced.

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

Comment: Pinioning is performed in order to prevent some breeds of waterfowl from flying & escaping and therefore breeding with wild waterfowl. Due to the limited availability of suitably experienced Veterinarians in Australia, we would suggest pinioning be performed by experienced personnel.

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

Comment: Dubbing and web marking are often performed on potential exhibition poultry breeding stock. In relation to dubbing, female chickens do not require dubbing & so to differentiate at a day old is unrealistic as most exhibition poultry fanciers do not have the proficiency to sex day old chickens. Dubbing chickens at hatch poses a welfare concern as a reasonable portion of chickens are hatched naturally under hens & the chickens and mothers would be disturbed at this vital time. Dubbing should be performed by an experienced person much later but still whilst the headgear remains immature. Dubbing is necessary to minimise the risk in some breeds e.g. in game breeds to prevent damage to the head gear which can be caused by their natural aggressive behaviour and in Mediterranean breeds, the males head gear can become too large affecting their condition.

Re toe web marking, this is normally performed on day-old on chickens hatched in incubators but due to not disturbing chickens naturally hatched under hens, this may be performed later.

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

Comment: This is unclear as more detail is required on what constitutes appropriate 'pain relief' for poultry and which surgical procedures are referred to on poultry. Also, if & where the poultry pain relief medication is available i.e. via a veterinary prescription which would be impracticable.

In regards to Regulation Impact Statement (RIS):

Policy Objective :To minimise risks to poultry welfare; and to reduce both industry uncertainty and excess regulatory burden in a way that is practical for implementation and industry compliance.

- *Section 1.4 Consultation processes:*

Gawler Districts Poultry Fanciers Assoc. Inc. wish to emphasise that Exhibition Poultry Clubs and community are not sufficiently represented & therefore this area needs addressing.

From the RIS, Option B is preferred over Option C until the suggested standards can be effectively addressed.

Gawler Districts Poultry Fanciers Association Inc. Executive Committee

Phone 08 85653286

Email: skeldale45@westnet.com.au