

11th July 2024

Secretariat – Boards and Committees
Governance and Ministerial Services,
Transport Canberra and City Services Directorate
ACT Government

RE: Stakeholder Engagement - Poultry Code (Non-commercial)

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation.

As a general comment - the Animal Care Australia Species Representatives, including an avian veterinary practitioner, that reviewed this were surprised by the level of ideological infiltration in the wording of this document. In our opinion that is unnecessary. Codes of practice should be clear, non-ambiguous, science-based and free of emotional rhetoric.

We provide the following direct feedback:

Standard 4.1 Birds must have a social environment that enhances their quality of life. They are a flock animal and must not be kept alone without other chicken companions.

Not supported as a Mandatory Standard. This should be part of G4.1. Children can and do keep individual poultry - especially ornamental poultry. While it is true chickens are social species (ie flock species) there is no animal welfare harm in the keeping of an individual bird - as long as they are kept in a healthy environment with feed, shelter etc.

Standard 7.6 Birds must not be held and carried by their legs, wings, or necks .

Not Supported. The ambiguity of this text is overreaching.

National standards permit the carrying of poultry by two legs - but do not permit carrying by only one leg. Animal Care Australia supports the national standard, which also prevents the carrying by wings and necks.

When carrying poultry and pheasants it is necessary to hold their legs - to prevent injury to the bird and also the person carrying the bird. This wording implies the person cannot be securely grasping or holding the legs while carrying. That is poor animal welfare.

This should be re-worded to state ... not carried by one leg, their wings or necks. The word ‘held’ is overreaching and too open to misinterpretation.

Guideline 7.3 Birds should be picked up with both hands and held so that they cannot flap their wings and so that their bodies are supported.

S7.6 - carrying by legs should be included here: Suggested text: Birds should be picked up with both hands and held so that they cannot flap their wings or strike out with their legs, so that their bodies are supported.

Standard 9.2 Killing must only be undertaken by a person, such as a qualified veterinarian, who is sufficiently expert to ensure that the killing is immediate and as painless as possible.

‘such as a qualified veterinarian ...’ - Why is this here? Either the person is experienced (ie an expert or not) Guideline 9.1 is sufficient to imply the ‘expert’ may be a qualified veterinarian.

Guideline 9.3 Where carers do intend to slaughter their own birds for consumption, it is recommended, with reservations, that engaging a qualified person to break the bird's neck is the least inhumane method.

'... with reservations ...' Again, Why is this wording here? It is not necessary and is an animal rights ideological insert.

We hope we can assist you on future consultations in order to provide an 'on the ground' perspective that represents the people that are keeping the animals.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, looping 'M' and a long, sweeping underline.

Michael Donnelly
President
0400 323 843

About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights