



Jeff Dodd
 Development Planning
 Sunshine Coast Regional Council
 Locked Bag 72
 Sunshine Coast Mail Centre, Qld 4560
 1-2-2019

Dear Jeff

Re: Request for Third Party Advice: Application MCU 18/0311

RSPCA Qld welcomes the opportunity to comment on the proposed development as described in this application. In every consideration such as this, our primary focus is the welfare of all animals that will be housed at the facility. Assessing welfare can be complex and should involve many aspects. The RSPCA considers that the welfare of an animal includes its physical and mental state and good animal welfare implies physical fitness and a sense of wellbeing.

The RSPCA believes that the Five Freedoms form a great foundation on which to assess welfare. Not only should animals have sufficient to eat and drink, and be free of injury and disease, they should also be provided with an environment that provides for their social, behavioural and cognitive needs. They need to have the ability to express normal behaviours.

RSPCA has a number of policies directly related to the breeding and supply of companion animals. Policy A6.1 states that the RSPCA is opposed to uncontrolled breeding of companion animals because this inevitably leads to the euthanasia of healthy animals. A6.2 states that where animals are bred, RSPCA Australia believes that breeding must be planned to match the likely demand and undertaken responsibly to ensure suitable homes will be available for each animal. And A6.3 states that RSPCA Australia is opposed to the breeding of companion animals under inadequate conditions that fail to meet their behavioural, social and/or physiological needs.

The animal welfare of the animals that will reside or board at the proposed new facility does not depend solely on the physical features of the facility, but also, or even more so, on the husbandry practices followed, the nature and extent of the interactions between staff and animals, the social and cognitive enrichment offered to the animals along with the comprehensiveness of veterinary care. These in turn will be influenced by the number, and knowledge and experience of staff employed at the facility.

At the very minimum, the standards laid down in the recently mandated *Queensland Animal Welfare Standards and Guidelines for Breeding Dogs and their Progeny* must

The Royal Society
 for the Prevention of
 Cruelty to Animals
 Queensland Inc.

ABN 74 851 544 037

Animal Care Campus

139 Wacol Station Road
 Wacol QLD 4076

Locked Bag 3000
 Archerfield BH QLD 4108

P 07 34 26 99 99
 F 07 32 58 56 10
 E admin@rspcaqld.org.au
 W rspcaqld.org.au

Animal Care Centres

Bundaberg
 Doblo Street
 West Bundaberg QLD 4670
 P 07 41 55 17 49

Cairns
 Arnold Street
 East Stratford QLD 4870
 P 07 40 55 14 87

Dakabin
 Goodwin Road
 Dakabin QLD 4503
 P 07 34 80 64 50

Gympie
 Laurenceson Road
 Gympie QLD 4570
 P 07 54 82 94 07

Kingaroy
 Warren Truss Drive
 Kingaroy QLD 4610
 P 07 41 62 55 01

Mackay
 Cnr of Strickland Rd /Mount
 Bassett Cemetery Rd
 Mackay Harbour, QLD 4740
 P 07 49 44 17 26

Noosa
 Hollett Road
 Noosaville QLD 4666
 P 07 54 49 13 71

Toowoomba
 43 Vanity Street
 Toowoomba QLD 4350
 P 07 46 34 13 04

Townsville
 69 Tompkins Road
 The Bohle QLD 4818
 P 07 47 74 51 30

Patron: His Excellency the Honourable Paul de Jersey AC, Governor of Queensland.

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be adhered to. A copy of the document can be found at <https://publications.qld.gov.au/dataset/qld-dog-breeder-register-factsheets/resource/d86dee73-0421-4145-bb74-97b42f61e3a8>

The application documents provide architectural details including the size of the kennels and runs but do not include any other information by which to judge the welfare of future animal residents. In other words, the sizes proposed may be adequate if the care and practices carried out cater to all the needs of the animals. It is impossible to make a judgement of the animal welfare of future resident based solely on architectural details. RSPCA Qld believes that such an establishment would need to have well developed and written processes in place which provide positive welfare to all resident animals. These would need to be audited and reviewed regularly, and staff would need to adhere to them.

I hope this above information is of help in the council's deliberations and if I can provide any further help please let me know.

Yours sincerely

A handwritten signature in black ink that reads "Mandy Paterson".

Dr Mandy Paterson
Principal Scientist
Wacol Animal Care Campus
RSPCA Queensland

E mpaterson@rspcaqld.org.au W rspcaqld.org.au
Fb facebook.com/RSPCAQueensland Tw twitter.com/RSPCAQld
P 07 3426 9996 M 0400 440 595 F 07 3258 5610
Locked Bag 3000, Archerfield BH QLD 4108 Australia

