

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

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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

Mandy Pater

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