

24th October 2020
Central Coast Council
ask@centralcoast.nsw.gov.au

RE: Central Coast Council Keeping of Animals Policy 2020

Attention: Shann Mitchell - Keeping of Animals Policy

E: Shann.Mitchell@centralcoast.nsw.gov.au

First and foremost Animal Care Australia (ACA) would like to express our disappointment that a Council would instigate and implement restrictions on numbers of pets/animals able to be kept by its residents.

ACA strongly encourages all councils to promote and encourage the keeping of animals as pets as they provide extraordinary mental health benefits for all of us. Any restrictions only serve as a detriment to pets and those wishing to keep them.

ACA acknowledges Council's release of the Draft Keeping of Animals Policy 2020 for public consultation and thank you for the opportunity to comment.

ACA notes within your document the Policy restrictions are only being utilised as a guide for Council when considering issuing an Order 18. Could Council please advise how a 'guide' with a clearly defined restriction could be used to issue a legal notice? This is beyond understanding – either it is a restriction or it is not! Could Council also please advise:

- which animal welfare organisation/s were consulted during the drafting of this policy?
- which organisations and/or species specialists were consulted to determine the restriction numbers imposed?
- on the details of the training and expertise of Council's "Authorised Officer" to verify the level of expertise being applied regarding future site inspections. The knowledge base required for such a role has very specific skill sets – one's ACA seriously doubts are employed within Council.

ACA does not agree with or recommend imposing blanket limits on numbers of animals that can be kept especially when based under the guise of animal welfare or the prevention of potential nuisance claims.

Animal welfare is NOT about numbers – it is about the conditions, behavior, cleanliness, housing and husbandry that each animal is kept under by the owners – your residents.

Policies that restrict keeping of animals on the basis of preventing noise, odour or other issues for neighbours are strongly discouraged. Restrictions including permit requirements inflict an unnecessary compliance burden on residents and staff which only discourages animal keeping needlessly. Laws are already in place to deal with neighbourhood nuisance issues including matters due to poor animal keeping practices. Hobbyists are passionate about improving the health and temperament of their animals. ACA understands the need for Council to monitor hygiene, nuisance and health-related issues that may arise from the keeping of some animals and these issues can be dealt with by utilising the existing Acts listed within your policy without the need for an additional Policy that restricts the numbers of animals that can be kept.

ACA is currently recognised by the **NSW Department of Primary Industries** and we are a key stakeholder consulting on their Animal Welfare Action Reform and will be directly advising during that review, including revising codes of practice for the keeping of all pets.

ACA strongly recommends Council adopts a new objective of supporting the keeping of animals:

*“Central Coast Council acknowledges the importance animals play to the wellbeing of our residents.
Council’s default position is to encourage and promote the keeping of animals within the shire.”*

Imposing number restrictions IS an animal welfare issue – it’s an animal rights ideology!

Government – including Local Councils should not allow themselves to be swayed by animal rights ideologies and rhetoric that claims animal welfare is best achieved by restricting the number of animals that can be kept or bred. The perfect example of this is the current price increases of puppies and kittens in Victoria – due to a Government sanctioned policy of restrictions to breeding, in doing so the Government & Local Councils are effectively complicit in the profiteering from the sale of animals.

ACA has provided some recommendations relating to pet species that Council needs to take particular notice of. (See Annexure 1)

ACA has references to support this submission, and will be happy to supply them on request. Should Central Coast Council wish to review your current policy restrictions ACA offers our expertise to recommend more suitable categories, land areas and less restrictive numbers.

We can also provide contact information for small property management consultants and educators who would undoubtedly be more than happy to assist you.

For further information about Animal Care Australia please refer to Annexure 2.

Please do not hesitate to make contact if we can assist further.

Kind regards,



Michael Donnelly
President
0400 323 843



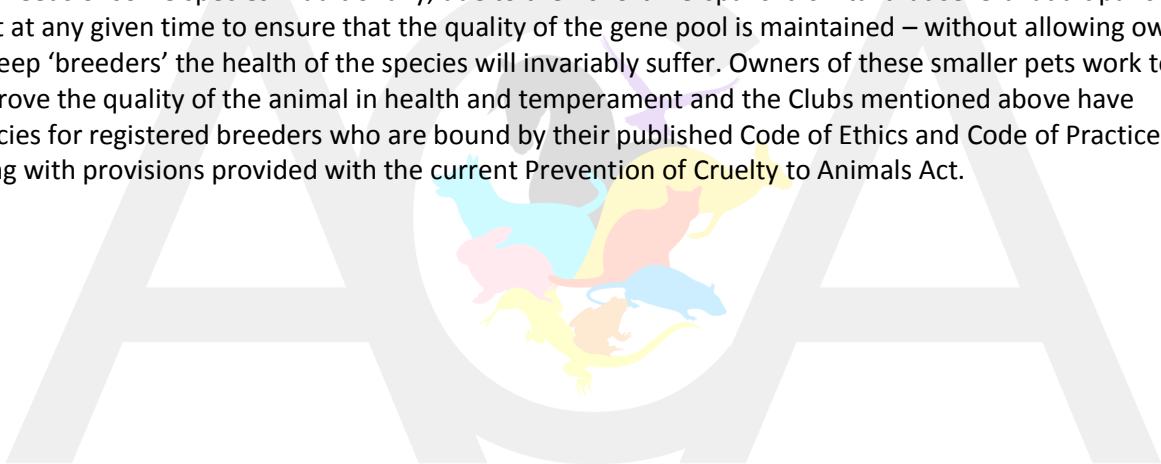
ANNEXURE 1:

ACA has the following comment and recommendations in relation to particular species:

Small mammals:

Imposed limits on the permitted number of rats, mice, rabbits, ferrets and guinea pigs which may be kept by an individual on their property are unrealistic. Many of these animals are colony animals, and it is important for their health and well-being to be kept in larger numbers than your policy imposes. In addition the policy goes against scientific research (*Short Communication: Rats Demand For Group Size - Journal of Applied Animal Welfare Science 7 (4) 267-272 – 2004*) into ideal colony numbers for rats, which have demonstrated that the numbers in your policy are not compatible with the fulfillment of basic social needs and high welfare standards. As companion animals allowing more appropriate colony sizes poses no threat to community, health or animal welfare.

Rats, mice, rabbits, ferrets and guinea pigs are primarily indoor pets and invariably kept in small enclosures. These animals do not exhibit extreme noise, are not intrusive and are free of the diseases and pathogens that often plague their wild counter parts. In fact they pose no health problem to their owners and are renowned for keeping themselves well groomed. For the Club registered breeding community the proposed limitations are also unrealistic, especially given the average litter size for some of these species is larger than the proposed limit suggesting that these proposals have not taken into account the biology and needs of some species. Additionally, due to their short life-spans it is vital that several adult pairs be kept at any given time to ensure that the quality of the gene pool is maintained – without allowing owners to keep ‘breeders’ the health of the species will invariably suffer. Owners of these smaller pets work to improve the quality of the animal in health and temperament and the Clubs mentioned above have policies for registered breeders who are bound by their published Code of Ethics and Code of Practice along with provisions provided with the current Prevention of Cruelty to Animals Act.



Annexure 2.



About Animal Care Australia

Animal Care Australia is a national incorporated association established to lobby 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 or ACA 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.

Mission Statement

Animal Care Australia (ACA) is the Peak Animal Welfare Body representing the keepers and breeders of animals in Australia as pets and companions.

Objects

- To represent Animal Care Groups as the peak animal welfare body
- To engage and advise Government and legislators on welfare issues relating to pets and companion animals.
- To protect the rights of ethical hobbyists & animal keepers to breed and keep pets and companion animals.
- To clarify the difference between animal rights and animal welfare
- To promote higher Animal welfare outcomes