

29th August 2022
Chief Executive Officer,
Gold Coast City Council
gchaveyoursay@goldcoast.qld.gov.au

RE: Gold Coast City Council proposed amendments to Local Law 12 and Draft Subordinate Local Law 12

To whom it may concern,

Animal Care Australia (ACA) 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.

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.

ACA has continued to consult with the Queensland Government (including Department of Agriculture & Fisheries) as part of the current review of the *Animal Care and Protection Act 2001* which regulates the welfare of all captive animals.

ACA is engaged with state governments to develop more appropriate model Local Laws and model Subordinate Local Laws governing the keeping of animals in each state. Nationally, ACA is finding Local Councils placing restrictions and permit requirements on their residents which do nothing to improve animal welfare and tend to lead to greater non-compliance.

ACA would like to congratulate Gold Coast City Council for recognising this and for the most part removing restrictions and permit requirements. ACA wishes other Councils would do the same.

To this end, ACA supports the following recommendation made by the Canary and Caged Bird Federation of Australia (CCBFA) in their submission:

Recommendation:

Add the following as an additional object 2(2)(e) to both LL12 and SLL12...

“Gold Coast City 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.”

In reviewing the proposed Amendments ACA would like to raise the following points of concern and suggested recommendations:

Bundall Equestrian Precinct

ACA welcomes the proposed changes that will exempt properties in the Bundall Equestrian Precinct from the prohibition on keeping horses, along with the requirement for permits for property owners so that potential impacts can be proactively monitored. ACA requests any data associated with the monitoring be made publicly available via Council Reports to ensure full transparency.

Horses and other livestock outside of the Bundall Equestrian Precinct

ACA supports the proposed changes to restrictions for keeping horses and other livestock outside of the Bundall Equestrian Precinct and the requirement they must be kept in compliance with the minimum standards.

Birds – Aviary, Fowl and others

ACA does not support the current amendments for bird numbers or permits and to this end in response we support the submission from the Canary and Caged Bird Federation of Australia (CCBFA) – one of our member organisations.

Bees, rats and mice

ACA supports the proposal to remove permit requirements, and we are encouraged to note Council considered these requirements to be over-regulation.

ACA supports the requirement for Minimum Standards to still apply.

Animal breeders, kennels, pet shops, animal carers and guard dogs

ACA supports the removal of the requirement for these animal keepers to hold permits. ACA is encouraged to note Council has recognised these activities are already subject to the requirements of other State government laws or are operating under planning approval conditions, and therefore the requirement for them to hold a permit is considered over-regulation.

Keeping of dogs (koala protection)

ACA supports the inclusion of requirements which assist the safe passage of koalas through backyards where a dog resides, in order to minimise the number of koalas injured by domestic dogs.

ACA believes the introduction of koala protection requirements for all dog owners is reasonable and fair.

ACA believes the introduction of requirements for dogs kept in a koala area (land under 2000m²) is reasonable and fair.

ACA believes the introduction of requirements for dogs kept in a koala area (land over 2000m²) is reasonable and fair, however, with the additional caveat:

Replace the current wording:

Section 86A Koala conservation requirements—Local Law, s33

86A 2 (c)(ii) between sunset and sunrise, tether the dog by a leash or chain which is—

(A) not more than 3m long; and

With:

86A 2 (c)(ii) between sunset and sunrise, tether the dog by a leash or chain which is—

(A) not more than 3m long, with the provision of shelter and water ; and

ACA highlights the importance of this amendment to protect the animal welfare of contained dogs by tether.

Control of animals in public places

ACA supports the proposed amendments.

ACA has no further comments in relation to the remainder of Councils proposed amendments.

It should be noted that ACA will be making this submission public and is prepared to follow the outcome of this draft.

Should Gold Coast City Council wish to persist with restricting numbers for birds, particularly based on various land areas rather than as specified in the DAS Code of Practice—Aviculture, ACA requests Council convene a meeting with us to enable our species representatives, including representatives from the CCBFA, to directly address Council and provide a more concise position.

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

Kind regards,



Michael Donnelly
President
0400 323 843

For reference:

The Gold coast Council Amending Document termed a "Fact Sheet", *Proposed amendments to the City's animal management local laws* is located at the following URL...

<https://gchaveyoursay.com.au/77711/widgets/378383/documents/237063>

This document proposes to amend *Local Law No. 12 (Animal Management) 2013* (LL12) located at the following URL...

<https://www.goldcoast.qld.gov.au/files/sharedassets/public/pdfs/local-laws/local-law-no12-2013.pdf>

and *Subordinate Local Law No. 12 (Animal Management) 2013* (SLL12) located at the following URL...

https://www.goldcoast.qld.gov.au/files/sharedassets/public/pdfs/local-laws/subordinate-law-no12-2013_.pdf