

19<sup>th</sup> October 2023

Tablelands Regional Council  
E: [info@trc.qld.gov.au](mailto:info@trc.qld.gov.au)

**RE: Amendment To Local Law No. 1 (Administration) 2019 & Subordinate Local Law No. 2 (Animal Management) 2019**

Animal Care Australia (ACA) 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.

Restrictions on the number of animals on a property is not supported by Animal Care Australia without full consideration of the animal welfare impacts on the individual species, particularly on land greater than 1 acre – regardless of its zoning.

Animal Care Australia questions the validity of the proposed number restrictions and the method of ascertaining specific numbers for each species. There are no scientific facts to support the proposed restrictions.

This does appear to be a case of an uneducated, ill-informed Council responding to a minority of animal rights influenced complaints. Council has stated publicly that these changes are as a result of complaints but has failed to state the circumstances or basis of the complaints.

**Dogs:**

Restrictions to just three (3) or more dogs being kept on lots under 4000m<sup>2</sup> without a permit are not supported by Animal Care Australia.

Equally, Animal Care Australia does not support the existing restrictions on smaller land sizes:

- one dog on a premises which is up to 600m<sup>2</sup>
- one or two dogs on a premises which is between 600m<sup>2</sup> and 4000m<sup>2</sup>
- three dogs on a premises which is over 4000m<sup>2</sup>

Council should be recognising that keeping 3-5 Chihuahuas will have very different space needs than 3-5 Great Danes and so on. Consideration MUST be determined by the breed wanting to be kept and more importantly the conditions in which the animals are being kept – and NOT the numbers.

**Horses and Livestock:**

Animal Care Australia does not support the amendment to require residents to apply for a permit to keep stock animals on 4000m<sup>2</sup> and 20,000m<sup>2</sup> (1 – 5 acres). Tablelands Regional Council is a rural and regional district, and implementing city style, anti-pet keeping policies to such an area is entirely inappropriate, nor is it animal welfare based.

Animal Care Australia questions why alpaca, buffalo, camel, cattle, deer, donkey, goat, horse, llama, or sheep on smaller acreages are being excluded from species appropriate welfare management practices?

Grazing animals have measurable welfare and grazing standards that can be monitored and addressed by Councils as needed. Arbitrary number caps, such as the ones proposed here are out of line with good animal welfare and land management practices.

For livestock, the DSE (Dry Sheep Equivalent) and the property Carrying Capacity would determine the appropriate number of animals that could be kept on any lot. The proposed change to limit stock on 4000m<sup>2</sup> and 20,000m<sup>2</sup> should be deleted. Animal Care Australia cannot comprehend the rationale behind this.

“Allow for 1 stock animal per 4000m<sup>2</sup>” could apply to one sheep or one buffalo! This makes no sense, these are animals with very different needs, and very different impacts on the land. Such a restriction also completely disregards the Dry Sheel Equivalent (or DSE) calculation method used by livestock managers, including the Department of Primary Industries (DPI) and Royal Society for the Prevention of Cruelty to Animals (RSPCA). This method determines how many dry, 50kg sheep, and the equivalent in other species, that the individual pasture can reasonably support. For example, dry, mature cattle are 7-8 DSE, and a goat is the same as sheep. A pony is 5 DSE, and a horse 10 DSE. Breeding animals have a higher DSE, as their dietary needs are higher. The DPI provide helpful charts that clearly list the DSE of all livestock species kept in Australia.

However - knowing the DSE is only part of the assessment. The land is assessed for its Carrying Capacity (sometimes called Feed On Offer) which is the amount of available grazing plants on the land. Tropical areas, such as Far North Queensland, have more year-round grazing available than southern Australian states. The natural, and man-made features of the individual property will also impact its Carrying Capacity. Following a visual assessment of the land in question, there is a standard calculation method to determine the Carrying Capacity.

The Stocking Rate is then determined by DIVIDING the Carrying Capacity by the DSE. The result will vary throughout the year as well as year to year, based on local weather and environmental conditions, as well as how the land has been managed in the past. It is simply NOT a set figure, which is why this calculation was created and adopted by livestock managers. The Stocking Rate is an assessment guideline, to help livestock managers make decisions about how the property is managed and what needs to change over time to ensure that the animals are managed in a way that improves the land.

A property that is correctly set up with Equicentral, cell grazing, or other rotational grazing systems can support many more animals in higher welfare conditions than poorly maintained land with set stocking or track systems with only 2 animals. Proper grazing management also protects properties against fire, and limiting numbers of animals will lead to higher fuel loads and neglect of harder to manage areas, as landowners focus on the easier and cheaper to manage areas. This comes to the detriment of native species in the area, as well as the human inhabitants and their animals.

Horses and farm animals are herd animals and should be kept in groups of 2 or more to meet their minimum welfare needs. A horse should never be kept alone (without another horse nearby). Allowing single horses on a property will create new welfare issues for the animals in your Shire.

The draft numbers in Councils proposed amendment to Subordinate Local Law No. 2 (Animal Management) 2019 completely ignore the management system of the animals, the type of property (whether the land is cleared and level, or bush and steep, or contains waterways), the Carrying Capacity and plant species of the pastures, and the species-specific welfare needs of the animals themselves. The draft laws proposed only serve to punish good land managers, and negatively affect the welfare of their animals, and the productivity and appearance of their land. At worst it is discrimination of small acreage owners, preventing them from following proven farming principles utilising grazing behaviours of horses and farm animals to properly manage their grazing lands.

Quality rural districts like Tablelands Region are diminishing and poor acreage property planning such as these proposed animal numbers is contributing to the degradation and misuse of land, further feeding the perception that animals are to blame for the loss of land quality. This is a misconception and can be rectified with education - of councils as well as of landowners.

Instead of limiting the numbers of horses and livestock to enact unrealistic, unhealthy, low welfare standards, Council could invest in property management programs and workshops for acreage owners in the Shire. Courses that educate those who are new to the rural lifestyle on how to manage their acreage with animals, identify grass species and weeds, how to protect waterways and natural resources, and preserve native animal habitats on their land has been hugely successful in NSW and Victoria, with little to no cost to participants. These programs are easy to run and encourage landowners to fully appreciate the value of their investment and take pride in looking after the land and their animals to a high standard. This benefits everyone in the Shire, not just those that live there, but for local tourism as well.

Animal Care Australia 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.

Animal Care Australia does not agree with imposing blanket limits on numbers of animals that can be kept especially when based solely on ideological theories – or as in this circumstance – a small handful of complaints –

and particularly where those complaints may be animal rights based. Animal restrictions for many species create animal welfare concerns.

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

Policies that restrict the keeping of animals based purely on preventing noise, odour or other issues for neighbours are strongly discouraged. Laws are already in place to deal with neighbourhood nuisance issues including matters due to poor animal keeping practices.

Restrictions that require permits inflict an unnecessary compliance burden on residents and staff which only discourages animal keeping needlessly.

We respectfully request a meeting with you and look forward to hearing from you regarding a suitable time to discuss this urgent matter.

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

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, stylized '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. We estimate our foundation ACA clubs currently represent well over 150,000 members and that is just in NSW alone!

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:

- lobbying government for stronger welfare outcomes
- lobbying government 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