



Snezana Redford
Sunshine Coast Regional Group Leader
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22 June 2020

Notice of Objection – MCU18/0311 – Proposed Material Change of Use to Establish Animal Keeping at 2312 Steve Irwin Way, Landsborough (Lot 2 RP180434)

To whom it may concern,

The Animal Justice Party QLD (“**the AJP**”) thanks the Sunshine Coast Council (“**the SCC**”) for the opportunity to submit an objection regarding the above proposal lodged by the applicant, Diamond Valley Kennels Pty Ltd, to drastically expand commercial operations and establish new dog kennels for breeding and boarding in Landsborough. This submission is made on behalf of the AJP’s Sunshine Coast members and is endorsed by both the AJP’s Queensland branch and National Committee.

The AJP’s objections are as follows:

- This industrial facility is proposed to hold 60 spaces for dogs who will be expected to have numerous litters, simply a profit-based business, motivated to sell “designer” breeds, such as cavoodles and miniature dachshunds.¹ These animals are shown to suffer from more medical issues inherent to their limited genetic makeup.²
- Consultation with members within the region reinforces our stance, with growing community concerns about animal welfare, staunchly opposed to developments that perpetuate commodification and unnecessary euthanasia of dogs in this region. There is no moral argument that justifies the material change of use to exploit more dogs for the industrial production of puppies.
- The expanded industrial facility will result in a massive influx of dogs into the Sunshine Coast region. SCC will find increased demand for services, especially with Council pounds and surrenders. These issues are linked to the oversupply of companion animals. Furthermore, the facility will require more regulatory oversight from SCC relating to the upkeep of permits and conditions pursuant to the *Local Law*.

¹ www.abc.net.au/news/2019-03-17/dog-breeding-facility-versus-puppy-farm-sunshine-coast/10904504

² The University of Sydney Listing of Inherited Disorders in Animals (LIDA) provides information on common disorders for a range of breeds.

- The AJP recognises the importance of companion animals, and advocates for adopting over buying, with many local shelters eager for people to adopt animals who are looking for forever homes. Allowing intensive dog breeding sites to keep breeding, when dogs are being euthanised in Council shelters because they are deemed to be unadoptable, is senseless. By accepting the material change of use application, SCC will be inviting commercial activities which are under-regulated in Queensland.
- Animal welfare legislation is lacking in Queensland; there are no litter limits meaning breeding dogs can begin from their first season and continue for as long as they are physically mature until they cannot physically produce any more puppies. It is completely legal to kill dogs within the intensive dog breeding site when they are no longer required or deemed effective and profitable. There are no requirements regarding exercise, socialisation, or enrichment. The keeping of animals in enclosures has many documented health risks³ and will require significant regulatory oversight to ensure acceptable animal welfare standards and compliance with SCC local laws.
- The drastic expansion will result in up to 100 breeding kennels and 200 boarding kennels. With the site's proximity to native vegetation and waterways, the concentrated confinement of hundreds of dogs will likely have adverse impacts on the local environment and animals, partially through noise pollution. SCC must consider the impact of the material change of use on the surrounding non-human environment.

We sincerely hope you take into consideration our objections when making your decision, put animals ahead of profit and reject Diamond Valley Kennel's Development Application. The growing community expectations are for local councils to develop laws that protect companion animals and support the region's animal shelters.

Yours sincerely

Snezana Redford

AJP Sunshine Coast Regional Group Leader

³ According to the RSPCA, a puppy-farming environment where dogs can be caged in conditions similar to those of battery hens, can cause long-term health and behavioural problems in breeding dogs and their puppies, due to: extreme confinement – in some cases breeding animals may never be allowed out of their cage to exercise, play, socialise, have companionship or even to go to the toilet; inadequate veterinary care and general care (grooming and parasite control); unhygienic living conditions; inadequate and overcrowded housing conditions.