

Assistance Animals Survey

Australian Government –
Department of Social Services
2021



Animal Care Australia



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ANIMAL CARE AUSTRALIA
STAKEHOLDER SUBMISSION

Assistance Animals Survey

Australian Government – Department of Social Services.

The development of a nationally consistent approach to assistance animals.

Animal Care Australia (ACA) is an animal welfare organisation representing all pet and companion animal owners, including dogs, cats, horses, small mammals, reptiles & birds.

Dogs are generally recognized as Assistance Animals, however a number of other species are regularly utilised as therapy and emotional support animals and all should be recognised as Assistance Animals.

ACA would like to make the following responses and recommendations to the Survey Questions:

Question 1: People with disability using assistance animals have reported challenges when visiting states or territories outside of where their assistance animal is registered. What are the challenges?

ACA acknowledges the following challenges need to be overcome:

- Access to transport is denied
- Access to public spaces is denied
- Access to accommodation is denied
- The registration of the assistance animal is not accepted in another state/territory.

Guide Dogs Australia are more widely recognised than some of the other accredited assistance animal services, however there have definitely been situations where access to transport is denied.

In NSW Guide Dogs are not accredited as puppies and trainers have had instances of being denied access to public spaces whilst training puppies for their future requirements as a service/ assistance dog.

Each state is accepting of Guide Dogs.

Other Assistant Animal Services may encounter more problems with inconsistencies across state and territories and lack of recognition.

Question 2: An option to address these challenges could be the development of national principles*, to provide consistent registration and/or accreditation criteria for assistance animals, across states and territories.

In relation to the below listed principles, ACA would like to include the following statements as part of the development of national principles:

- **Accreditation requirements for assistance animal trainers and/or training**
Puppy Development Advisers are not all accredited trainers and accordingly ACA recommends the implementation of accreditation for ALL animal trainers.
- **Minimum assistance animal training standards**
Minimum standards should be applied nationally.
- **A single national Public Access Test for assistance animals**
ACA believes this is a step in the direction to establishing a national policy.
- **Evidence of disability and need for an assistance animal**
ACA DOES NOT support the need for proof of disability. Disability is and should not be recognized as the only reason for the need of an assistance animal.
- **Nationally recognised identity card for a handler and an assistance animal**
- **Nationally recognised logo or branding (for example, dog harnesses)**
ACA recommends the use of a nationally recognised system including identity cards, and logo/branding that can be displayed to quickly identify that an animal is an assistance animal.

National principles would form guidelines that would need to be considered alongside state and territory regulation and accreditation.

Do you have any other suggestions?

If National principles are only to form guidelines for consideration by the other states/.territories then does that not contradict the intent of this survey? ACA supports

a National Standard/Policy - this needs to be achieved by consulting the other states/territories and then setting a policy that must be followed on a national scale.

Question 3: Apart from national principles, what other changes could be made to solve the challenges identified in question 1?

By setting National principles that must be followed, the challenges identified in question 1 would be predominantly resolved.

Question 4: Should there be registration and/or accreditation of assistance animals, other than dogs?

If Yes, please provide further details. For example, which animal? Could these animals meet standards of hygiene and behaviour that are appropriate for an animal in a public place?

All assistance animals should be accredited through the same scheme, with some species specific variations to the requirements.

For example, horses cannot lie down or crawl under things the way that dogs can, and this needs to be included in consideration when assessing the animals.

ACA strongly believes the scheme cannot truly be considered as a national, unifying accreditation scheme if it only recognises accredited dogs.

Most domesticated animals could be suitable. Many people requiring aged care and/or are elderly persons living alone rely on pets and companion animals as assistance animals particularly to support and maintain mental health, including but not exclusive to, cats, dogs, birds, and some small mammal species. Just like with dogs, the individual species' health and temperament need to be assessed and proper training provided. Unlike dogs, prey animals such as horses and livestock can begin training in adulthood with no disadvantage to their working life span.

Most commonly used internationally are miniature horses. Horses provide an alternative to dogs for allergy sufferers, they live much longer than dogs and therefore have a much longer working life than dogs do, which makes them cheaper to train



longer term. One horse needs to be trained for every 4-6 dogs, which one person may have over their lifetime.

Horses are especially useful to assist with weightbearing, to help people with balance or coordination issues, and are quiet, clean animals. They can also pull wheelchairs and other apparatus to assist with mobility.

In the United States, height limits apply to mini horses as service animals (usually table height, so they can be 'parked' underneath at restaurants etc) however this has been somewhat impractical, as it limits the weight bearing capacity of the service horse. If the person is too tall or heavy for the short horse, leaning over is more dangerous, and a taller horse/pony is safer and more supportive for them. It also puts less pressure on the horse which is a welfare consideration. Such low heights limits should not be enforced in Australia, although it is reasonable to limit the height to meet a purpose as full size horses are impractical for daily assistance work encountering the public.

Question 5: Do you have any other comments or suggestions relating to the recognition of assistance animals at a national level?

It is reasonable to expect a sensible requirement as to why a person is using an animal other than a dog or a mini horse, but as long as the animal can meet the accreditation training criteria, can be housebroken, its welfare needs are met, is unobtrusive and does not appear threatening or behave in a threatening manner towards other animals or people, then there is no reason this cannot be regulated and managed in a way that benefits people with a wider range of disabilities than is currently accommodated.

Training organisations should be legislated to accept all kinds of animals for training, OR alternatively, new training organisations should be established for this purpose, with financial support to establish them.

The decision whether to accredit animals other than dogs and horses should not be based on biases, tradition or corporate whims, but be *'in the best interests of the people this legislation is intended to serve'*.

Many people have fears of dogs, are allergic, or experience other issues that result in them being disadvantaged and without an assistance animal. Sensible alternatives should be available with training, accreditation and on going support.

ACA is aware of only 2 assistance horses-in-training in Australia, and neither are fully trained due to the lack of support, resources and acceptance. This leads to individuals feeling unsafe and remaining homebound and invisible.

How many people are living like this? How many just need an assistance animal to physically help them participate in the community again? With abuse of vulnerable persons a recognised issue, we should be assisting those who need support with the tools and training that THEY NEED, not only what is most convenient for legislators and existing training organisations.

We can do better and ensuring that animals other than dogs are properly trained and accredited with ongoing support is essential.

As a nationally-based organisation ACA welcomes the opportunity to continue to consult on this matter in the future.

Kind regards,

Michael Donnelly

President, Animal Care Australia.

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