

9th September 2022
Whittlesea City Council
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Moreland City Council
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Darebin City Council
E: Lina.Messina@darebin.vic.gov.au

RE: Epping Animal Welfare Facility

Dear Council Mayors,

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 is currently recognised by **Agriculture Victoria, Department of Jobs, Precincts and Regions** as a key stakeholder in their new animal welfare legislation and will be directly consulting and advising during that review, including revising codes of practice for the keeping of all pets.

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 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 is of the understanding your Councils will be taking over control of the RSPCA Victoria's Epping Animal Welfare Facility after the 16th of October 2022. As you are no doubt aware RSPCA Vic are currently proposing to reduce the holding time of cats and dogs at the facility to just three days – down from eight.

ACA does not support the proposal as it raises major concerns for the pets of the residents serviced by this facility.

ACA acknowledges the reasons cited as to reduce as:

“that by reducing this time, it will improve the wellbeing of animals in their care and help them to better transition to new homes.

Animals in shelter quarantines have an increased level of stress as they're confined to a small space, not able to interact with other animals and are unable to exercise regular behaviour due to the confinements of quarantine.

The RSPCA has said evidence shows animals who are kept in shelters for longer periods of time are also more likely to catch diseases like kennel cough and cat flu.”

ACA strongly questions the reasons cited. Animals held in shelters for only three days are unlikely to exhibit appropriate behaviour due to the levels of stress attributed to just arriving at the Facility. ACA questions the ability of accurately determining any behavioural issues prior to be handed off to a privately run rescue/shelter. Those shelters (mostly volunteer-run) regularly do not have trained animal behavioural staff, with the level of expertise required to safely rehome the animals. Animals require several days to settle prior to being assessed. This is not possible in just three days.

The RSPCA's own statement quoting animals in shelters for longer periods of time are likely to catch disease etc highlights several points of concern:

- 1) Animals at the RSPCA should be quarantined for at least the first week to prevent the spread of disease.
- 2) If animals in the care of the RSPCA are currently being infected by the quoted diseases – this raises concerns as to the efficacy and ability of the RSPCA when it comes to animal welfare.
- 3) Isn't this simply the RSPCA passing the responsibility of the animals' health off to another organisation?

Most importantly animals only held for three days places the burden on owners of lost animals who may for several reasons not realise their animal is missing or be able to pursue a known missing animal (such as their own hospitalization, particularly given the ongoing Covid-19 pandemic). It is unreasonable to assume all animal owners would be able to secure the location of their animals within three days.

The movement of the animals from being 'captured' then into a quarantined enclosure, and onto another location (the rescue/shelter) all carried out by strangers within a period of 72 hours is FAR MORE LIKELY to induce higher stress levels than the animals being able to settle and be accurately assessed over 7-8 days.

ACA does not see this proposal as being in the best interests of the animals, rather it is in the best interests of the RSPCA. The reduction of holding times is contradictory to the purpose of a shelter.

ACA calls your attention to recent NSW Legislation requiring Councils and pounds to hold animals for no less than seven days before handing animals to a rescue/shelter.

The Companion Animals Rehoming Act 2021 can be found here:

[Companion Animals Amendment \(Rehoming Animals\) Bill 2021 \(nsw.gov.au\)](https://www.nsw.gov.au/companion-animals-amendment-rehoming-animals-bill-2021)

What makes the RSPCA Vic feel they know better than current legislated requirements – albeit in a different state/territory?

As Mayors of the Councils that will be taking on the responsibility and running of the facility, ACA implores you to ensure the holding times either remain at the current eight days or, should they be reduced by the RSPCA prior to your ownership, that you return the time to eight days. It is in the best interests of the animals and your residents.

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

Kind regards,



Michael Donnelly
President
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