

6th May 2024

Mitcham City Council
Environmental Services and Community Safety
E: yoursay@mitchamcouncil.sa.gov.au

RE: Draft Animal Management Plan 2024 - 2028

Animal Care Australia 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.

Animal Care Australia is currently recognised by the Department of Agriculture, Forestry and Fisheries and the Dog and Cat Management Board as a key stakeholder in the ongoing review of South Australia’s Animal Welfare Act 1985, Dog & Cat Management Acts, and the associated regulations. Animal Care Australia is directly consulting and advising throughout the reviews, including any future revision of Codes of Practice for the keeping of all pets.

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, companion animals, animals used for educational or entertainment purposes or kept for conservation.

Animal Care Australia 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, Animal Care Australia 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.

Animal Care Australia DOES NOT SUPPORT the single use of surveys as a means of consultation. It is inappropriate to claim you have consulted when organisations are not actually able to lodge a written submission. Council’s survey also required a resident’s address – again excluding national based organisations from submitting. Within the Management Plan (page 2/24) Council states:

“This broad participation helps ensure that the priorities and concerns of a wide cross-section of the community are considered.”

This is an inaccurate statement as the exclusion of non-residents/national-based organisations does not provide for an accurate assessment of ‘priorities of a WIDE CROSS-SECTION of the community’ Surveys are misleading and provide for irresponsible statistical analysis.

It is pleasing to see Council acknowledging the health benefits that pets can bring.

Animal Care Australia draws your attention to the following on page 6:

“Balancing Needs of Pet and Non-Pet Owners: Emphasises on the importance of striking a balance between the needs and rights of pet owners and those who may not own pets. This ensures that policies and practices consider the well-being and interests of all residents.”

It is vital that Councils support the keeping of all pets within their shires/municipalities and that Councils consult with the appropriate stakeholders when looking to address the many myths or phobias that are expressed by uneducated members of the public, in relation to the keeping of some animals.

Animal Care Australia also commends Council on your approach and policy of educating your residents about responsible pet ownership.

Collaboration with Stakeholders (page 7):

“Collaboration with various stakeholders, including government agencies, community groups, and animal welfare organisations, is highlighted as essential for effective animal management and achieving shared goals.”

Again, this is extremely difficult to achieve if the consultation is only being conducted via a survey restricted to residents within desired postcodes. Animal Welfare Organisations in particular are mostly national or state-based and do not 'reside' within your Council area, even when our members do.

Animal Care Australia does not support Councils stance on dog training methods on pages 7-8.

The positions of the RSPCA and Australian Veterinary Association are based on IDEOLOGICAL views and not SCIENCE. While it is understandable for Council to believe the viewpoints expressed by these two organisations, the fact remains their methods do not provide for the best outcomes for all dogs, and that is reflected in the fact the RSPCA has the highest kill-rates for 'behavioural' issues across the country. Council should be paying greater attention to the information from organisations such as Professional Dog Trainers of Australia.

Cat Management (page 13)

Animal Care Australia supports a 24/7 cat containment law.

Animal Care Australia supports cat containment that requires cats to remain on their owner's property at all times as curfews have limited impact on the issues relating to roaming cats unless it is a 24/7 containment.

However, there are some items that need serious consideration and any changes to local animal management laws should provide an avenue for greater consultation and feedback.

- Animal Care Australia commends Council for phasing in its cat containment legislation. Cats that have been allowed to roam need time to adjust to be confined and it may have detrimental welfare impacts if the cat is not allowed time to become accustomed to the changes. Therefore, by only applying your legislation to new cats born or registered this does allow for the cat to acclimate to this policy.
- Animal Care Australia does have some concern with this policy incentivising some residents to not register their cats in order to 'avoid' this legislation.
- Costs of installing cat runs or other methods are expensive, and this should be taken into consideration in the current cost of living crisis.
- Council should provide assistance for cat owners wishing to construct or instal appropriate containment enclosures. Councils should recognise the need to consult with all residents in their catchment area and to provide assistance with approval processes for the construction of enclosures etc.
- Animal Care Australia commends Council for allowing cats to be walked on leash etc.

While Animal Care Australia DOES NOT SUPPORT the restriction of numbers on the keeping of any pet – we do acknowledge legislative requirements place permit requirements on Council and therefore your residents. Animal Care Australia is pleased to see the ability to own more dogs and cats can be applied for, we note the inability to quickly navigate to appropriate permit fees etc is a concern.

It is also important that consideration is provided by Council for fostering of cats and dogs which currently do not appear to fit within the requirements of the permit system. Fostering is vital when shelters and rescues become over-crowded or when an animal needs some extra attention prior to being re-homed.

Animal Care Australia would welcome the opportunity to consult with Council as an animal organisation (in this case a national animal welfare organisation) on all aspects of your Animal Management and in particular educational material promoting and encouraging responsible pet ownership.

Animal Care Australia strongly supports Council moving away from any reliance on the RSPCA.

Animal Care Australia welcomes the opportunity to consult with you and look forward to hearing from you in the near future.

Kind regards,



Michael Donnelly
President
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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.

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:

- advocating for stronger welfare outcomes
- advocating 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