

10<sup>th</sup> April 2025  
Department of Social Services  
Email: sector.engagement@dss.gov.au

### **National Principles for the regulation of Assistance Animals – Consultation**

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 encourages continued development of a national consistent approach to the rights of those who rely on assistance animals across Australia. Recognition of assistance animals is vital, and consistency is essential to improving public understanding of assistance animal services.

Animal Care Australia acknowledges the Assistance Animal Principles do not refer to the type of animal so that it does not stop other types of assistance animals being recognised. Animal Care Australia supports that animals (not just dogs) will continue to be recognised (and protected) under the definition in the Act.

To that end, we would like to make the following points and recommendations:

#### **1. Nationally consistent accreditation requirements for assistance animal trainers and/or training organisations**

Currently there is far too much state-by-state variation in training requirements and determining the suitability for public access entitlements. This is creating confusion and inequality for people who rely on assistance animals. Ideally, a national standard for minimum training requirements would allow for consistent public access rights across Australia, without the need to navigate differing state-based systems however Animal Care Australia notes the inclusion that despite the potential of a national standard being implemented, it would still be up to state ministers to review, endorse and adopt it. This is not good enough. A national standard should be mandated – otherwise, what is the point?

#### **2. Minimum Education Requirements for Assistance Animal Trainers**

Animal Care Australia strongly supports minimum education requirements for individuals training assistance animals. However, Animal Care Australia is also aware of individuals establishing themselves as 'qualified trainers' and utilising methods of training that are more ideological than practical and educational as such the courses and relevant methods should also be mandated. Animal Care Australia recommends the nationally accredited ACM40222 Certificate IV in Animal Training and Behaviour (Assistance Dogs) as the benchmark qualification.

This would go some way to ensure that trainers possess a consistent, evidence-based foundation in animal behaviour, learning theory, and practical training techniques.

#### **3. Standardised Public Access Test**

Animal Care Australia support the introduction of a national Public Access Test (PAT).

Ensuring national consistency in the evaluation of assistance animals is vital in order to uphold public safety and access rights while giving clear expectations to trainers, handlers, and the broader community.

PATS should have the ability to be targeted to the individual needs of the person while meeting the already set requirements of remaining under control and behaviour predictably in public.

These should be reassessed when the needs of the person change or where concerns are raised that the animal is not responding as it should be.

#### **4. National Requirements for Disability Evidence and Need**

Animal Care Australia conditionally supports the establishment of a national standard for verifying the handler's disability and their need for an assistance animal. A national standard would promote fairness,

reduce ambiguity, and help prevent the misuse of the assistance animal framework, however the ever-changing landscape of mental health, disability awareness, improved support mechanisms and disability support requirement should dictate the national standard must be open to some of flexibility or regular review. Persons with what may be deemed as 'milder' disability should not be victimised by a standard that is not keeping up. This is why Animal Care Australia requires the opinion of a health/medical practitioner to be recognised as part of the evidence of identification/definition of an assistance animal.

Remember: the animal should match the needs of the disability – not a set 'out of touch' criteria.

## **5. National Identity Card and Assistance Animal Logo**

Animal Care Australia supports a nationally recognised identity card and logo for assistance animals and their handlers as this would improve public recognition, reduce confrontation in public spaces, and support enforcement of access rights across the varying jurisdictions.

The card should of course identify the individual by name, provide a reference number that is linked to a database that records when the PAT/s were conducted, approved, and include an identifiable description of the animal including the name of the animal.

## **6. Wellbeing of Assistance Animals**

Animal Care Australia support a national approach to the ongoing welfare of assistance animals, including standards for their care, before and during their working life and post-retirement.

It is critical that these animals receive the highest standards of health care, rest, and support both during service and afterward, with inclusion of government financially supporting any veterinary care the animals require in order to ensure financial burdens are not the reason why animals miss-out on the best care standards.

## **7. Clarification of the definition of "Assistance Animal"**

Returning to above points, Animal Care Australia believes the current definition of an assistance animal is ambiguous and insufficient. While it is overly broad, which has led to some levels of misinterpretation and misuse, it equally excludes the ability of inclusion and recognition of specific individuals' needs.

Animal Care Australia recommends that the definition is clarified to ensure animals with the right temperament, capability, and training required to perform specific tasks related to a person's disability can be classified as assistance animals.

Should you require further details please do not hesitate to reach out. We thank you for the opportunity to contribute to this important consultation and welcome the chance to be further involved in the development of these national principles.

Kind regards,



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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