

31<sup>st</sup> August 2025  
Macedon Ranges City Council  
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### **Domestic Animal Management Plan 2026-2029**

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.

Animal Care Australia is currently recognised by Animal Welfare Victoria as a key stakeholder in the review of Victoria's Animal Welfare Act and its associated regulations. Animal Care Australia is directly consulting and advising during that review, including the 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 sole use of surveys as a means of consultation**. It is inappropriate for Council to claim you have consulted when organisations are not actually able to lodge a written submission. Surveys are misleading and provide for irresponsible statistical analysis.

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.

In reviewing Council's current Domestic Animal Management Animal Care Australia would like to raise the following comments and concerns:

- Animal Care Australia commend Council for your initiatives to reduce some fees for animals adopted from a registered animal shelter, and for the first-year free registration for desexing cats.
- Animal Care Australia would like to remind Council that the requirement for impounded animals to be microchipped and registered prior to release on top of any impoundment fee and/or fine might be a deterrent to owners reclaiming impounded pets.
- Animal Care Australia commend Council's 'First ride home free' program waiving fees for impounded pets with current council registration and no prior offences.
- Animal Care Australia commend Council's 'For the Love of Paws' initiative and ongoing commitment to expanding the education of pet owners. As a part of this expansion, Council should consider running town hall style information sessions for residents to engage face-to-face with council/officers to help them understand the messages better, and to assist in removing the 'fear of council.'
- Animal Care Australia supports Councils intention to review and implement a 24-hour cat containment to the owner's property. It is noted this is not to be implemented until 2028 and accordingly Animal Care Australia encourages Council to extensively consult (including with Animal Care Australia) as measures need to be considered, such as, it could lead to high abandonment rates as owners cannot afford to erect containment measures, not to forget those who haven't registered their cats due to the high costs and perceived threat of the seizure of their cats.
- Animal Care Australia notes the mandatory desexing of cats and dogs does not include exemptions for registered breeders, which is clearly necessary and should be stated.

- Animal Care Australia recommends standard fees for registration should be applied rather than the higher un-desexed rates. Most dog/cat breeders (including Domestic Animal Businesses) are not actually making a liveable income from their breeding (it is a hobby), and as such should not be penalised for doing so. Commercial breeders should not get exemptions, as their purpose is run as a profit business and costs can be offset in taxable rebate incentives for businesses.
- Reducing dog attacks is an admirable goal, but the statistics supplied to justify the means as to how this will be achieved needs to distinguish between an actual attack, and other 'threatening behaviour' as there is no definition of 'threatening behaviour' in the draft document.

This is concerning as what one person may find 'threatening' may not be the case for another person, for example, an overly friendly dog rushing toward someone to greet them, rather than to attack them. People who have a fear of dogs will construe overly friendly behaviour as 'threatening.' Considering that Council only has 4 declared menacing dogs registered and no dangerous or restricted breed dogs, indicates to us that the 244 reports made about dog attacks and threatening behaviour cannot be upheld after investigation.

- Animal Care Australia commend Council on promoting low cost desexing and microchipping initiatives, and even funding some of them.
- Animal Care Australia does not support charging Domestic Animal Businesses a fee for a random audit/inspection. In most cases, these inspections are as a result of a vexatious complaint. These complainants are more often those of a single individual who do not echo the sentiments of the surrounding neighbours or community and DABs should not have to pay exorbitant inspection fees in order for Council to evaluate the validity of a complaint, especially when no substantiation of the complaint is found.
- Animal Care Australia strongly questions the ability of Council to carryout compliance enforcement with just 4-6 Local Laws Officers, when they are responsible for ALL Local Law issues. Council has stated that animal related compliance/enforcement activities consume 60% of such Local Law activities by those 4-6 officers. Council should consider appointing full-time Animal Management Officers to focus on the task at hand.

While Animal Care Australia acknowledges a Domestic Animal Management Plan is for dogs and cats we also take this opportunity to highlight an animal welfare concern with Council Local Law:

- **The numbers listed for species within Local Law 2023 v1.4 Division 3 – Animals - are contradictory to the animal welfare needs of the species.** These will lead to animal welfare issues which leads us to believe they have simply been 'made up' – likely based on personal bias rather than facts.

Animal Care Australia STRONGLY recommends any impending Review of Local Laws MUST include the removal or review of animal number restrictions in a manner that is appropriate to the species and to society's expectations – both of which are NOT being met by current Local Law restrictions.

Restrictions on the number of small mammals to any property is not supported by Animal Care Australia without full consideration of the animal welfare impacts on the individual species, particularly where key stakeholders have not been consulted – as apparent by the proposed restrictions in this Policy.

Animal Care Australia questions the method of ascertaining specific numbers for these species. There appears to be no logic to the methodology in this circumstance.

#### **Small Mammals:**

**Animal Care Australia does NOT SUPPORT the limit of just six (6) animals in total.**

Rabbits, ferrets, guinea pigs, rats and mice are considered as house pets and have been for some time now.

Now that housing cost forces people into smaller unit dwellings, indoor pets such as rabbits, ferrets, rats, mice, and guinea pigs are becoming the norm.

Owners of these smaller pet's work to improve the quality of the animal in health and temperament and animal related clubs and societies have policies for registered breeders who are bound by their published Code Of Ethics and Code Of Practice along with provisions provided with the current Prevention of Cruelty to Animals Act.

There are many animal keeping Societies for rabbits, guinea pigs, rats, and mice.

## **Ferrets**

Ferrets have become much loved companion pets and while they do require some care, maintenance and ensuring that they are kept very entertained and occupied when awake, they in fact do not require a lot of space which makes them perfect as 'indoor' pets.

Ferrets are far more secure indoors and escapes into the environment are far less likely to occur with an indoor kept pet than an animal out in a cage.

Ferrets are also social animals and should be kept at a minimum as pairs or in groups, therefore Council's restriction of the total number of small mammals including ferrets is impractical, uneducated, ill-advised, and most definitely NOT SUPPORTED.

## **Rats, Mice and Guinea Pigs**

These animals are colony animals, and it is important for their health and well-being to be kept in larger numbers than what Council's policy imposes. As companion animals allowing more appropriate colony sizes poses no threat to community, health, or animal welfare.<sup>1</sup>

Rats, mice, and guinea pigs are primarily indoor pets and invariably kept in small enclosures. These animals do not exhibit extreme noise, are not intrusive and are free of the diseases and pathogens that often plague their wild counterparts. In fact, they pose no health problem for their owners and are renowned for keeping themselves well groomed.

For the Club registered breeding community, the proposed limitations are also unrealistic, especially given the average litter size for some of these species is larger than the proposed limit suggesting that these proposals have not considered the biology and needs of these species. Additionally, due to their short lifespans it is vital that several adult pairs be kept at any given time to ensure that the quality of the gene pool is maintained – without allowing owners to keep 'breeders' the health of the species will invariably suffer.

## **Rabbits**

Many people that keep rabbits in any residential situation keep them as pets and the majority of pet rabbits are kept as indoor pets for their health and safety. Vaccines do not provide protection against all of the government released rabbit haemorrhagic viruses that are designed to eradicate feral rabbits.

Responsible pet owners will have their rabbits desexed should THEY NOT wish to breed. Council imposing restrictions is an extreme overreach of power and highlights how out of touch with animal keeping this policy is.

Small mammals are extremely popular, particularly in circumstances of higher residential density areas, make no noise, and despite common misconception produce little to no odour. Small mammals are colony animals and Council's limit of only a total of six (6) of all these species is simply poor animal welfare. This is especially applicable if different species are kept as, it further limits the ability of the pet owner to keep suitable colonies of each species if limited to such a small total number of combined small mammal species.

**Animal Care Australia recommends the table in Local Law 2023 relating to small mammals is replaced with a reference to Codes of Practice developed by state animal keeping associations.**

If Council wishes to persist with numbers, then it should be made clear that council officers will look to providing an exemption (no permit required) for those keeping their pets in a manner that does not unduly affect neighbourhood amenity.

## **In closing:**

The animal restrictions **do not** improve animal welfare. Instead, Council is imposing restrictions that address perceived community amenity problems, which are simply unfounded.

Animal Care Australia 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. All restrictions only serve as a detriment to pets and those wishing to keep them.

Animal Care Australia does not agree with imposing blanket limits on numbers of animals that can be kept especially when based solely on ideological theories as these theories are animal rights based or on species

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<sup>1</sup> [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004\)](#)

bias. It is glaringly obvious the stronger restrictions apply to species that most people either dislike or fear – rats, mice, ferrets and rabbits.

Animal welfare is NOT about numbers – it is about the conditions, behaviour, cleanliness, housing, and husbandry that each animal is kept by the owners – your residents.

Policies that restrict the keeping of animals based on preventing noise, odour or other issues for neighbours are strongly discouraged. Restrictions including permit requirements inflict an unnecessary compliance burden on residents and staff which only discourages animal keeping needlessly. Laws are already in place to deal with neighbourhood nuisance issues including matters due to poor animal practices. Council should seek consultation with real animal experts to provide a policy that not only works for the council and its community but also ensures good welfare outcomes for the animals.

Animal Care Australia's primary objective is 'education over regulation' and always commend Councils wherever they seek to further the education of their residents.

Animal Care Australia has references to support our submission and will be happy to supply them on request. We recommend viewing our online document: [Council Animal Management Plans](#)

It is necessary to call your attention to these restrictions in the hope that while Council is reviewing the Domestic Animal Management Plan you will consider approving amendments to Local Laws taking into consideration our feedback and provide the opportunity for residents to keep their pets, in particular, small mammals without the need for permits.

Animal Care Australia would like to request a meeting to discuss further collaboration to ensure a policy that aligns with the needs of your pet keeping residents.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you and further discuss this matter.

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