

9th August 2025
Monash City Council – Animal Management Team
Email: mail@monash.vic.gov.au

Draft 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 draft Domestic Animal Management Plan Animal Care Australia would like to raise the following concerns:

Animal Management Training:

Page 9 states: *"The functions and responsibilities around animal management are delivered by the Community Laws team that sits within the Community Safety and Amenity Department. The team comprises one Community Laws Team Leader, one Senior Community Laws Officer and nine full-time Community Laws Officers. All officers are multi-skilled and provide animal management services, as well as general community laws services. These officers report to the Coordinator - Community Laws"*

While this reads well, the 11 team members are spread across all facets of council workings, and none are indicated to be dedicated to animal management specifically. What happens if all team members are attending to other council business and are not available to attend an animal management issue?

Another issue is that as the 11 officers are multi-skilled, they would all be constantly attending training courses for all facets of their work, of which animal management is only one. This raises concerns of the waste of direction of talent/skillsets as required to each specific area of compliance enforcement. Currently listed are 12 distinct training areas just for animal management... how many courses are required for the other areas of their multiple responsibilities? Animal Management is complex and should have dedicated Animal Management Officers and not 'part-time' attention officers.

Programs to promote and encourage responsible pet ownership and compliance with legislation (page 11):

"Council's approach to education and enforcement is based on the principles of Educate, Ask, Tell, and Enforce."

Animal Care Australia commends Council on this approach along with the outlined list of education programmes being provided to your residents.

Page 12 – lists various ways Council informs the public of their animal ownership responsibilities. Animal Care Australia is pleased to note that leaflets, newsletters, corflutes et al are employed as well as publishing on the council website and highly commend this approach.

Registering of pet cats

Council's website states "*In order to register your cat with the City of Monash, your cat must be desexed.*".

Doesn't this incentivise non-registration of cats as indicative of having a little over 5000 registered desexed cats (listed on page 7) with only 7 entire cats registered?

Isn't it a better approach to offer fee variations for desexed and non-desexed cats, or better still, non-desexed cats that are registered are provided access to discounted desexing.

Supporting Cat Containment

Animal Care Australia commends Council on the following statement on Page 14: "*Cat containment can be supported by providing cat owners with resources and information to assist with transitioning their cat to a stay-at-home lifestyle. Councils' Cat Control Order requires that cats are confined to their property between sunset (or 7pm) and sunrise. To support cat owners in transitioning to an indoor or contained lifestyle, distribution of information to assist will be a focus within the plan. This may include information on how to build cat enclosures, how to transition cats to an indoor lifestyle and being aware of plants toxic to cats either in the yard or in the home*"

Animal Permits:

Animal Care Australia DOES NOT SUPPORT Councils requiring permits for additional animals – outside of the state-legislated numbers for dogs and cats.

While the numbers listed for certain species within the Restrictions on Animal Numbers ¹ are reasonable, those listed for birds 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.

Restrictions on the number of animals on a 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.

Birds – Aviary, and others

For birds other than poultry, the numbers proposed are NOT SUPPORTED.

There are hundreds of avian species routinely kept in Victoria, and every species has its own specialised management, husbandry, enclosure size and welfare requirements. Placing a limit of just ten domestic birds is simply ill-founded. Finches are far smaller and much quieter than pigeons, as an example. Therefore, we recommend the removal of the restriction of ten and insert: To be kept as appropriate to species, size of cage/aviary or bird room' into the list.

The bird numbers within this list shows a clear lack of knowledge regarding bird keeping and its enormous breadth and management techniques.

It should be noted that the keepers of some poultry may be members of Agricultural Societies, and the keepers of avian birds could be members of Avicultural Societies. Council could include "Members of avicultural clubs, are exempt from the above limits provided their birds are kept such that they do not unreasonably affect the amenity of neighbours."

Small Mammals:

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.

¹ [Restriction on animal numbers](#)

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 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 only two ferrets impractical, uneducated, ill-advised, and most definitely NOT SUPPORTED.

Rats, Mice and Guinea Pigs

The limit of just four (4) rats or eight (8) mice is NOT SUPPORTED by Animal Care Australia.

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. ².

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 draft 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 a limit of such small numbers is simply poor animal welfare.

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.

Alternatively, permits should be free and most certainly should not expire annually. These annual permit fees are nothing more than fundraising for Council while penalising anyone wishing to keep pets.

In closing:

The animal restrictions **do not** improve animal welfare.

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.

² [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004\)](#)

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

Animal welfare is NOT about numbers – it is about the conditions, behaviour, cleanliness, housing, and husbandry that each animal is kept under 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 recommends viewing our online document: [Council Animal Management Plans](#)

While Animal Care Australia acknowledges the inclusion of other animals in a DAMP is not permitted, It is necessary to call your attention to these restrictions in the hope that while Council is approving amendments to Local Laws, in the future, that you consider our feedback and provide the opportunity for residents to keep their pets, in particular, small mammals and birds without the need for permits.

Animal Care Australia welcomes the opportunity to discuss these matters further to ensure a policy that aligns with the needs of your pet keeping residents.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive, flowing style.

Michael Donnelly
President
0400 323 843
president@animalcareaustralia.org.au

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