

25<sup>th</sup> September 2025  
Moonee Valley City Council  
Community Engagement Team  
Email: yoursay@mvcc.vic.gov.au

### **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.

With this in mind, **Animal Care Australia commend Council on the following:**

- "Register to Reunite" program.
- Discounted initial Registration Fees for pensioners and Service dogs.
- Undertake targeted pet registration promotion at events and via targeted neighbourhood patrols and pop-ups – especially where the purpose is to educate pet owners rather than to catch out residents with unregistered pets.
- Improve data about dogs, dog owners, dog attack victims, and dog attack circumstances to help with future dog attack prevention initiatives and monitor trends. This applies to all data collection and should be regularly accessible by the public in order to promote transparency of the issues local residents are experiencing.
- Undertake targeted responsible animal management promotion at events, park patrols, and pop-ups.

### **Specific Comments:**

#### **Focus Area 1: Animal Registrations**

##### **1.2 Consider how to increase the value proposition for customers to register their animals.**

Council could consider utilising the "Register to Reunite" program to include one fee free impoundment for first time offenders? Animal Care Australia recommends looking at Macedon Ranges Council's "Free Ride Home" program for how this has been a successful initiative.

### **1.3 Undertake research to investigate barriers to registration.**

The most obvious barrier is the need to register non-cat/dog animals and annual fees.

Animal Care Australia does not support the need or reasoning for extra animal permits; however, we commend Council for having 'fee free additional animal permits' for dogs and cats. That said, please refer to our response below regarding the animal numbers and restrictions as they are uneducated and ill-informed, and contradictory to good animal welfare outcomes and the requirement for permits to keep pet birds, reptiles and small mammals is categorically not supported.

Where an individual need is identified for a permit or number restriction that could be an exception requiring an annual renewal and fee.

### **1.4 Explore partnerships with animal service providers, volunteer groups, and community hubs to promote and increase pet registrations.**

Animal Care Australia supports this initiative and recommends consulting with local and national pet keeping and breeding associations. Council should provide digital education material that can be shared on social media, association newsletters, etc.

## **Focus Area 2: Community Safety**

### **2.1 Undertake education about best practice containment of pets at the family home.**

There is only one targeted campaign slated for the life of this DAMP, which is disappointing. Campaigns should be at least an annual in addition to being part of regular informational sessions.

## **Focus Area 3: Community Tensions**

### **3.1 Review the animal complaint process to ensure it is easy to understand and take part in and that the customer is informed throughout the process.**

This is vital. On far too many occasions Animal Care Australia receives complaints from our members frustrated by the 'lack of due process; and what is becoming more apparent – the need for Council to 'shut-up' a complaining neighbour to the detriment of a resident who is in fact the victim of the complaining neighbour. While Council is responsible to respond to complaints, Council is equally responsible to ensure full and proper investigation and process is undertaken. Local Laws etc are far too often used as the 'scapegoat' excuse rather than justice for situation.

Animal Care Australia strongly believes there needs to be clearer, transparent procedures in place that are fair to both complainants and pet owners. A structured process flow (e.g. complaint received → initial mediation → barking diary issued → owner approached and provided with diary → timeframe to rectify issue before escalation) would provide transparency from Council's side and ensure consistency for all parties. (Barking dog issue used as part of the example)

### **3.2 Improve barking dog case data about dogs, dog owners, complainants, and case circumstances to help with future barking dog prevention initiatives.**

There are a number of reasons for dogs barking, and as long as it is not sustained over extended periods, it should not be considered an issue.

Generally, sustained periods of dog barking are due to boredom and/or lack of exercise or anxiety of being left alone after having owners constantly at home. These issues should initially be dealt with via education and strong encouragement of owners to provide their dogs with activities etc when owners are not at home, and with exercise when they are at home.

While, debarking is illegal in Victoria, it can only be performed by a registered veterinarian in extreme circumstances and only when following the Code of Practice for Debarking of Dogs, which

requires a thorough assessment and a statutory declaration from the owner stating all reasonable efforts have been made to control barking. Council should add this as a consideration and support the owner where all other options have been exhausted, as this is a preferable option than to order a family dog to be sold, removed or seized from its home.

#### **Focus Area 4: Environment and Animal Welfare**

##### **Target – decreasing numbers of unowned cats, increasing desexing rates of owned cats.**

Unfortunately, Council has over-simplified this issue. Cats cannot simply be designated as “pets” or “ferals” – they also comprise “unowned/colony” cats. To designate only the two options of “pet” or “feral” ostensibly dooms all trapped un-microchipped cats to euthanasia.

Animal Care Australia strongly recommends Council re-evaluate this section considering the identified classifications of cats and their management within the Victorian Cat Management Strategy 2025.<sup>1</sup>

##### **4.1 Undertake feral cat trapping in environmentally sensitive parts of the municipality to address the impacts of feral cats on native fauna.**

As noted above – despite Council having a night-time curfew for cats – not all cats wandering at large are going to be “feral” and as such requires a multi-faceted program that addresses all actual levels of cat populations within the community.

Animal Care Australia does not support the statement that:

*“Feral cats are the single biggest threat to native fauna”*

While it is true cats (feral or otherwise) are responsible for killing native wildlife, there are many other factors that need to be considered.

The inclusion of that statement in its current context serves no other purpose than to inspire and promote a hatred of cats and cat owners. This should either be re-phrased or removed.

##### **4.2 Undertake research to investigate barriers to cat desexing.**

Animal Care Australia questions the need to carry out more research especially when the identifiers are outlined in the Victorian Cat Management Strategy. A better use of ratepayer money in this case would be to subsidise desexing costs for low-income pet owners. Copious research on this issue has already ascertained that the biggest barrier to desexing is cost.

##### **4.4 Explore partnerships with volunteer groups, to promote and increase pet adoption and re-homing.**

Private rescue groups are already doing much of the work in this sphere. Engaging with an ensuring rescue are being run responsibly would be a great ongoing process for Council to meet this need. Encouraging those ‘proven responsible’ rescues to share the informational/educational aspects relating to the benefits of owning a pet etc, would further develop that relationship. Council held/supported pet days which included local rescue groups would be a great start.

##### **4.5 Undertake pet adoption and re-homing promotion.**

Animal Care Australia questions why this action is only listed for twice a year (minimum). Utilising local papers, online community groups, and social media advertising should be occurring all year.

Could also be included in community information sessions (as per actions 1.6, 2.4, and 3.4)

##### **Keeping of animals and extra animal permits:**

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<sup>1</sup> [Victorian Cat Management Strategy](#)

It is necessary to call your attention to animal restrictions within the DAMP and on Council’s website, as this is where Council is disappointing in its approach to pet ownership and Animal Care Australia DOES NOT support the number restrictions listed in the table below.

It is our hope that while Council is reviewing the Domestic Animal Management Plan you will consider approving amendments the restrictions above taking into consideration our feedback and provide the opportunity for residents to keep their pets without the need for permits.

### How many animals can I have?

If you keep more animals than listed, you will need to submit an [Additional Animals Permit Application online](#).

Permits expire on 10 April annually.

**2025/26 fee for non-cat and dog permits is \$43.**

There is no fee for housing additional cats and dogs, but a permit is required.

Type of animal	Small property (under 150m2)	Large property (150m2 and over)
Poultry (excluding roosters)	0	6
Caged birds	5	15
Roosters	0	0
Dogs	1	2
Cats	1	2
Rabbits	1	5
Rodents	2	6
Reptiles	5	5
Racing pigeons	0	40
Farm animals	0	Only permitted by permit where there is 2,000m2 of open land per animal
Any other animals	0	0

The restriction on birds, rabbits, rodents, reptiles and ‘any other animal’ are in contradiction of the animal welfare needs of all of these species.

This table is completely out of touch with pet keeping in Australia and the community expectations of being able to keep pets freely while still maintain the animal welfare standards.

**‘Any other animals’**

The banning of ferrets, pet fish and other aquatic species, pet insects and arachnids is ABSOLUTE overreach, ignorant and unnecessary.

It is legal to keep these animals as pets in Victoria, and these restrictions appear to be based on species-bias and not animal welfare. It should be noted that Animal Welfare Victoria supports the keeping of these other pets <sup>2</sup> (including the other small mammals). Council should note that AWW recommends the small mammals are all social animals. There is no justification to restricting or banning the keeping of these species.

**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.**

#### **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.

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 is uneducated, ill-advised, and most definitely **NOT SUPPORTED**.

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

The limit of just two (2) animals in a Unit/flat or land of less than 150m<sup>2</sup> 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. <sup>3</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

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<sup>2</sup> [Animal Welfare Victoria – other pets](#)

<sup>3</sup> [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004\)](#)

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 also 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.

We **STRONGLY recommend the removal of the permit requirement/restriction** and insert: ‘To be kept as appropriate to species.’

The blatant species-bias against small mammals shows a clear lack of knowledge regarding their keeping.

### **Cats:**

Restrictions (without a permit) to just one cat is not supported, with a recommended change to 2 cats where a permit is required for a third or more cat. Cats are social animals, and the idea that cats are solitary animals is incorrect and not in the interests of higher welfare for cats. Cats should have a friend, especially if they are to be contained to the owner’s home or property.

### **Dogs:**

Restrictions (without a permit) to just one dog is not supported, with a recommended change to 2 dogs where a permit is required for a third or more. Having only one dog on a block/unit of less than 150m<sup>2</sup>, especially if not considering the breed (i.e.: size) and is clearly an uneducated view.

There are no animal welfare justifications to this restriction – especially when considering small breed dogs.

### **Reptiles:**

Reptiles are extremely popular, particularly in circumstances of higher residential density areas, they make no noise, and despite common misconception produce little to no odour. Reptiles come in a range of sizes and husbandry needs. There are a broad range of alternative and legitimate management and housing systems and numerous other factors that should be considered when keeping reptiles/amphibians.

For reptiles, where hundreds of different species are being regulated under State Regulation via the Wildlife Act 1975 <sup>4</sup> and associated Regulations, which governs the keeping of reptiles by setting licensing requirements and regulating which species can be kept.

The vast majority of reptiles are housed in small enclosures, with many enclosures capable of existing in a child’s bedroom or other small space (substantially less than the stated 150m<sup>2</sup>). Number restrictions are simply not applicable and are inappropriate for ensuring sound animal welfare standards. The table should simply stipulate the reptiles must be kept in accordance with the Victorian Code of Practice for the Welfare of Animals — Private Keeping of Reptiles.<sup>5</sup>

### **Birds:**

The proposal relating to the keeping of birds is ill-founded. Clearly no one has been consulted on bird numbers and most importantly bird welfare.

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<sup>4</sup> [Wildlife Act 1975](#)

<sup>5</sup> [Code of Practice for the Welfare of Animals — Private Keeping of Reptiles](#)

Restrictions based on numbers of birds are archaic and reflective of animal rights ideologies. Birds come in a range of sizes and temperaments, many are flock species, there is a broad range of alternative and legitimate management and housing systems and numerous other factors. For birds, where hundreds of different species are being regulated, numbers are simple for legislators but inappropriate for ensuring sound animal welfare standards.

Animal Care Australia strongly recommends Council excludes the restriction of birds when the resident is keeping their birds in compliance with the Agriculture Victoria's Code of Practice—Housing of Caged Birds.<sup>6</sup> If numbers are to be restricted, then doing so according to this code has legitimacy and should be based on the housing needs of the particular species in question, for example keeping of requirements for canaries is vastly different to those of galahs. It must be breed and husbandry need specific.

Councils' restrictions are not supported as your residents would be hobbyists and current nuisance laws with regard to noise, odour, vermin, etc. are sufficient to ensure neighbour amenity is maintained should any problems occur.

**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 on the basis of 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 keeping practices.

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.

Animal Care Australia's primary objective is 'education over regulation' and always commend Councils wherever they seek to further the education of their residents. We recommend viewing our online document: [Council Animal Management Plans](#)

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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<sup>6</sup> [Code of Practice—Housing of Caged Birds](#)

## Comparison of Moonee Valley City Council DAMP 2021–25 vs Draft DAMP 2026–29

This provides a structured side-by-side comparison of the Moonee Valley City Council Domestic Animal Management Plan (DAMP) 2021–25 and the Draft DAMP 2026–29. It highlights continuities, key changes, and new directions.

Category	DAMP 2021–25	Draft DAMP 2026–29
Overall Structure	Broad, descriptive with many actions spread thin. Limited measurable outcomes.	Streamlined with 4 clear focus areas, explicit links to Council Plan 2025–29, measurable success indicators.
Animal Registrations	Encouraged registration, but without strong measurable targets. 'Register to Reunite' introduced late.	Registrations made primary priority. Target: 25% growth (~16,000 by 2029). Expanded education, partnerships, research.
Community Safety (Dog Attacks & Rushes)	Focus on enforcement and education. Limited data collection.	Education plus improved complaint processes, data capture on demographics and circumstances, trend analysis.
Community Tensions (Barking Dogs, Off-Leash Dogs)	Recognised issue, but actions less structured. Limited transparency in complaint handling.	Formal review of complaint process <b>but still requires a flow for this e.g. complaint received, medication, barking diary, owner approached provided with barking diary, given time to rectify.</b> expanded data collection, regular community engagement campaigns.
Environment & Animal Welfare	General focus on desexing and rehoming. Feral cat management noted but not prioritised.	Feral cat control elevated (aligned with 2024 federal strategy). Research barriers to cat desexing. Clear reclaim/rehoming targets.
Implementation & Governance	Annual review but not strongly tied to measurable metrics or LGPRF.	Strong alignment with LGPRF indicators. Annual community reporting. Resource alignment and compliance in appendices.

## **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