# "Animal welfare is animal care" animalcareaustralia.org.au



21<sup>st</sup> September 2025 Wellington Shire Council Email: enquiries@wellington.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 noncompliance.

First and foremost, Animal Care Australia thanks Council for acknowledging our organisation as an external agency for the purpose of consultation. (Section 1.3 – page 4).

Animal Care Australia commend Council on the following:

- As Wellington Shire is a predominantly rural LGA all areas are off-lead accessible unless designated as on-lead area.
- > Three-stage approach to managing at-large or wandering dogs and cats.
- A comprehensive and easily navigable pet information on the Council website including regular segments in local news media.

On Council's website, it states that the pound release fees are as follows:

- First impoundment = \$160 (registered cat/dog)
- Subsequent impoundments = \$190 (registered cat/dog)
- Unregistered cat/dog = \$190
- Daily sustenance fee = \$20 for small livestock does that include cats/dogs?

Are these fees inclusive of the at-large infringement penalty, or is that an additional charge? This needs to be made clearer. Livestock generally does not include cats/dogs however the implication throughout the DAMP appears to include them in charging daily sustenance fees. Animal Care Australia is aware other Councils do include dogs and cats. Again, this should be made clearer.

# Addressing low cat/dog registration compliance rates:

Estimated dogs in shire = 11,787

Registered dogs = 7,426

Estimated cats in shire = 9,972

Registered cats = 1,850

Annual registration fees are as follows:

- **☑** Entire dog/cat = \$169.50 (concession = \$84.75)
- Reduced fee = \$53 (concession = \$26.50) also applies to cats/dogs under 12 months old
- Excess animals permit = \$81 (annual) or \$190 (triennial) renewal due July 31 (annually or triennially)

If a non-concession pet owner has 3 entire cats/dogs, they would be paying a whopping \$589.50 (3 x un-desexed registration fee + annual excess permit) each year! If said cats/dogs were all desexed, the annual fees would still be \$240.

For a concession card holder, the fee for 3 un-desexed cats/dogs would be \$335 annually, or \$160.50 annually if desexed.

Frankly – these rates are far too high – especially during a 'national cost of living crisis.'

If Council reduced the annual registration costs significantly and removed the excess animal permit annual fee (instead charge a one-off admin/processing fee for issuing the permits), then Council might see a much higher take-up of registration of pet cats/dogs in the Shire.

This would result in Council spending less money on staffing hours and resources chasing compliance issues, by reducing the compliance issues whilst still maintaining an incoming financial stream.

The additional bonus of encouraging more cats to be desexed (due to lower associated fees) will also assist in reducing the number of 'free born' kittens wandering and continually breeding.

Animal Care Australia also finds the late renewal consequences to be too harsh, which would contribute to more non-renewals and not less:

# Late renewal consequences

- Failing to pay your pet's registration renewal by the due date may result in an infringement notice.
- You will no longer be able to renew as a Renewal of Registration.
- A new application must be made, including compliance with any new legislative requirements.
- Your animal's status will be updated to not renewed/unregistered in our records.

Why is Council creating extra work for its staff by requiring new registration applications if residents are a little late with their pet registration; officers door knocking and issuing infringement notices for late registration payments?

Surely an education over regulation approach is more beneficial for all parties involved? Council should allow a decent lapsed period before issuing infringements or requiring re-registration applications.

## Cat Curfew/containment:

Animal Care Australia notes and supports Councils 24-hour cat curfew introduced in January 2023, which requires all cat owners in Wellington Shire to confine their cats to their property. Also noted is

the reduction within the twelve months since the cat curfew came into effect of 81 fewer domestic cats collected at large, compared to the twelve-month period directly prior to the curfew.

Animal Care Australia looks forward to consulting with Council during the implementation of the Victorian Cat Management Strategy and any additional education initiatives that are needed.

# Dog Attacks:

While there is a commendable process in place for handling dog attacks, Animal Care Australia notes there is no requirement of or support for behaviour training of dogs involved – other than a temperament evaluation when a dog is impounded.

Council and residents would benefit in securing and recommending dog training professionals. Council should contact Professional Trainers Australia and work with this organisation.

## **Education and information:**

A number of the objectives outlined throughout the draft DAMP include utilising Council's website for the purpose of notification and education. Animal Care Australia commends this as it is a modern means of ensuring access to information, including the continued promotion through local media and social media. This information should be promoted via mailouts (yes, an old-school approach – but one that does not end up in email junk/spam folders) and promoted via leaflets at local pet stores, veterinary practitioners etc.

Animal Management Officers could also visit schools, TAFE, and other community-based groups to actively promote responsible animal ownership and compliance with the relevant laws Council should also closely consult with community-based groups to perform this face-to-face education, especially any pet/animal keeping associations.

## In closing:

It is necessary to call your attention to animal restrictions within the **Community Local Law 2021** - 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 **Part 6.1 Keeping of Animals (page 39) of the Community Local Law.** 

It is our 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.

The restriction of just two domestic mice, guinea pigs, one pet rabbit and no ferrets is in contradiction of the animal welfare needs of all of these species. The banning of ferrets is overreach and unnecessary. It is legal to keep ferrets as pets in Victoria, and these overall restrictions appear to be based on species-bias and not animal welfare. It should be noted that Animal Welfare Victoria supports the keeping of ferrets<sup>1</sup> (and other small mammals). 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

<sup>&</sup>lt;sup>1</sup> Animal Welfare Victoria – ferret keeping

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 <u>NOT SUPPORTED</u>.

# Rats, Mice and Guinea Pigs

The limit of just two (2) animals in a Unit/flat or land of less than 400m2 is <u>NOT SUPPORTED</u> 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>2</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 draft policy is.

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

<sup>&</sup>lt;sup>2</sup> Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 (4) 267-272 – 2004)

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 are 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 are 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 400m2, 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.

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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## **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