

16th October, 2025

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Follow-up to ACT Animal Welfare Advisory Committee and Codes of Practice for animal welfare in the ACT

As the Minister is aware Animal Care Australia has continually raised concerns relating to the lack of appropriate consultation for amendments to animal welfare legislation and related Codes of Practice. We would like to take this opportunity to thank Minister Cheyne for responding to our request to be included as a key stakeholder for all animal related consultations.

It is a shame that the previous requests sent to Minister Steel were not followed through either by the respective department or by the Animal Welfare Advisory Committee (AWAC).

As previously highlighted, Animal Care Australia has major concerns with the level of animal rights ideology that has infiltrated the ACT's animal welfare Act and Codes of Practice.

Animal Care Australia acknowledges receipt of correspondence from Mr Bruce Fitzgerald, Deputy Director-General, City and Environment Directorate (un-dated) and received on 30th September 2025, stating:

“I want to assure you that the ACT Government is currently undertaking a review of AWAC’s policy and advisory functions prompted by concerns from stakeholders regarding Codes of Practice. We want to ensure AWAC is operating as a beneficial model and has the ability to provide timely, evidence-based, and practical animal welfare advice to the Minister.

Before progressing any further with the outstanding Codes of Practice, including the Dog Code, it is important that we first clarify the future structure and remit of AWAC. This will ensure that the development and implementation of these Codes is both defensible and achievable.”

Animal Care Australia thanks Mr Daniel Childs for his follow-up phone conversation and we look forward to providing further consultation with his Policy Team in the future as Codes of Practice recommence development.

The review of the AWAC is very much welcomed by Animal Care Australia, and we call for the department to take particular note of our attached appendices highlighting the many flaws and subsequent potential animal welfare concerns of the previously assented Codes of Practice. Animal Care Australia strongly recommends a review of those Codes is necessary and amendments to the Codes is paramount.

Animal Care Australia acknowledges that this submission is an extensive read, however we find it vital to ensuring the appropriate information for keepers and carers of the species is provided, before any ‘claimed’ breaches of Code are enforced incorrectly.

Further background:

In October 2024, Animal Care Australia reviewed documents provided to us via a Freedom of Information (FOI) request (Freedom of Information Request - Reference 24-114). Requested were copies of Minutes from AWAC meetings extending between 1st January 2022 and 1st August 2024, including copies of all submissions provided to any consultation completed during the updating of the following Codes of Practice:

- 1) Animal Welfare (Welfare of Horses in the ACT) Mandatory Code of Practice 2024.
- 2) Animal Welfare (Keeping and Breeding of Ferrets in the ACT) Mandatory Code of Practice 2024.
- 3) Animal Welfare (Keeping and Breeding of Guinea Pigs in the ACT) Mandatory Code of Practice 2024
- 4) Animal Welfare (Keeping and Breeding of Rabbits in the ACT) Mandatory Code of Practice 2024
- 5) Animal Welfare (Keeping and Breeding of Rats and Mice in the ACT) Mandatory Code of Practice 2024

Briefly, the Minutes highlight a constant occurrence of ideological and biased opinions wanting to be implemented into the Reviews of all of the above Codes of Practice, and most recently the Code relating to the Welfare of Dogs.

Another concern is that members of the AWAC are tasked to provide reviews of the Codes, rather than the method used in other States where a consultation of the 'existing' code is completed by key and relevant stakeholders. This is then assessed by the department and a public consultation is then sought, with AWAC's providing input before and after the public consultations. The fact the ACT AWAC is reviewing, drafting, then reviewing and finalising any Code of Practice is not only questionable but is equally apparent when assessing the finalised versions of the drafts.

Why is this important? Comments similar to this from the RSPCA ACT (Michelle Robertson) and Australian Veterinary Association (AVA) (Dr Melanie Latter) representatives, highlight a clear agenda.

"Michelle Robertons (MR) said that grouping the small mammals may perpetuate the stereotypes about them (low maintenance, easy pets)."

"ML the welfare of the small mammals is often overlooked because of the lack of knowledge and education".

Ironically, and not lost on Animal Care Australia is the fact small mammals are low maintenance and easy pets to maintain, while the clear lack of knowledge (education) of the AWAC in relation to the keeping of small mammals is apparent when reviewing the assented Codes of Practice. Animal Care Australia's review of those Codes is attached to this submission.

Other than from the AVA there were limited stakeholder based submissions considered during the drafting of the Codes.

In reference to the Welfare of Horses, there are responses from the ACT Equestrian Association who raise a considerable number of concerns, the most important being:

"ACTEA was surprised that it was unable to find a copy of the existing Code. Apart from a brief outline of what the Code contained and the provided copy of Appendix 4 of that Code aimed specifically at horse riding establishments there seems to be no public manifestation of the existing Code; surprising since it is potentially a legal document."

A separate email submission from a redacted individual expressed concerns with 'equestrian dentistry' and the inclusion that only veterinarians should be permitted to conduct procedures, while ignoring qualified equestrian dentists.

Animal Care Australia notes the continued preference of the AWAC ACT to only permit veterinarians over other qualified professionals is repeated throughout the Codes and is strongly prevalent in the latest Code of Practice for the Welfare of Dogs.

There is a clear bias for veterinary involvement and for ideological outcomes over scientifically supported ‘common sense’ animal welfare outcomes, and it is no wonder when you note the structure of the AWAC ACT during the 2022-2024 period. (See Appendix 1)

While reviewing the AWAC structure, Animal Care Australia also notes Ms Judith Wooley the representative from DOGS Australia was replaced by Dr Hayden Montgomery – yet another veterinarian. This occurred in March 2025, at a time when the draft Code of Practice for the Welfare of Dogs was being finalised.

Again, it is not lost on Animal Care Australia that a replacement from the same organisation or similar representation ie a dog or cat member association was not appointed, especially at a time when a relevant Code of Practice is to be reviewed and assented.

Further Animal Rights infiltration:

The YourSay web page for the most recent ‘consultation’ of the Code of Practice for the Welfare of Dogs in the ACT, indicates a strong animal rights influence based on the language used (‘intrinsic value’, ‘beings who can feel and perceive’) It is very emotive and implies more than it actually states.

Strongly encouraged is the use of the survey with the clear statement “*Survey questions focus on key areas that stakeholder feedback can influence.*” The statement is then accompanied by the summary of the codes at the bottom of the page which are worded to make them look much more benign than the actual document states.

Animal Care Australia questions whether most people who fill in the survey have taken the time to read the full 45 page document or taken the summary at face value.

From the opening ‘Purpose’ of this draft Code of Practice it is very apparent the Code was written from an animal rights/ideological perspective:

“Animal welfare in a modern context describes how an animal is coping both mentally and physically.”

This is a statement taken directly from The Humane League ¹ which is an animal rights not for profit. Ironically, an organisation against animals being raised for food – NOT for the keeping of pets.

World Animal Protection ² also cites the same statement, however they go one step further to include:

“Animal welfare is important because there are so many animals around the world suffering from being used for entertainment, food, medicine, fashion, scientific advancement, and as exotic pets.”

Notably the language, ‘**animals are being used**’ is followed by ways in which animals are owned, the majority of which have strongly enforced animal welfare standards to ensure animals are not abused. Again the language of ‘**using animals**’ is reflective of an **animal rights agenda/ideology**.

Another element of animal rights ideology is the inclusion within the definitions of:

*‘**financial gain** – means any monetary or material gain that significantly exceeds the recovery costs reasonably incurred in caring for an animal up to the time of sale.’*

This is typical of the rhetoric perpetrated by animal rights extremists that animals are bred and sold for the sole purpose of making money. Financial gain is irrelevant to the proper care of animals if the

¹ [The Humane League](#)

² [World Animal Protection](#)

ANIMAL WELFARE needs of the animals are being met. Animals can be affected by poor animal welfare outcomes whether they are kept solely, or they are bred or as a food source.

Also in the definitions:

“sentient means –

- (a) Being able to subjectively feel and perceive the world around them; and*
- (b) have intrinsic value and deserve to be treated with compassion and have a quality of life that reflects their intrinsic value.”*

‘Subjectively feel’ – subjective to whom? The animal or the person evaluating the ‘world around them’? How does one determine if the animal is subjectively feeling and perceiving with any level of accuracy that does not include anthropomorphising your opinion on the animals’ environment?

This is why Animal Care Australia does not support the inclusion of sentience within legislation. Animal Care Australia acknowledges animals are sentient, however that should only be included within the definition of ‘animal’.

Basing legislation on sentience alone is problematic as it implies that it should be illegal for animals to experience negative emotional states. Measuring the emotions experienced by animals implied by sentience to a level of evidence required for compliance and enforcement is simply not possible.

- Who decides what the animal is feeling at a given time?
- How will Authorised Officers objectively measure the emotional state of an animal? Especially, when they investigate a complaint in the hours, or more commonly, days, after receiving a complaint?
- How does one prove to the court what the emotional state of an animal was at the time of an alleged offence?

This continual subliminal rhetoric is standard practice for animal rights extremism in order to indoctrinate and bewilder into submission that animals should not be owned.

The Codes of Practice continues to state it is based around the 5 domains:

- (1) Nutrition, (2) Environment, (3) Health, (4) Behaviour, and (5) Mental state.

While Animal Care Australia supports the 5 domains for the purpose of ensuring the animal welfare outcomes and needs of the animals are being met, the very structure of this AWAC ACT defies the ability of assessing how those needs are met and therefore are justified.³

Published studies have specified **the need for diverse and non-scientific backgrounds for panel members:**

“there would be merit in engaging panels or consultative networks with wide expertise and experience” (Mellor & Beausoleil 2015). Mellor et al. (2020) state that *“Any assumption of the occurrence of negative affects must be supported by directly observed animal-based physical, physiological, clinical and/or behavioural evidence”*.

The same authors go on to say:

“This is equally the case for the presence of opportunities for animals to engage in rewarding behaviours.”

Clearly, there must be evidence, usually behavioural, that any such opportunities are actually used before their potential welfare-enhancing impacts could be considered. Only then can inferences be made about any aligned negative or positive effects. Finally, Mellor et al. (2020) propose *that:*

“This emphasises the general point that objective animal-based evidence (Domains 1 to 4) must form the foundations of any inferences about welfare-relevant affects (Domain 5).”

³ [National Library of Medicine](#)

The assessments generated from the Five Domains model are derived through the use of panels and suffer from the problems inherent to the use of expert opinion or 'eminence' (Hampton et al. 2016b). This is of particular concern for contexts in which there are gaps in scientific understanding, and model outputs may thereby fail to be evidence-based (Baker et al. 2016).

This is true and evident in the flaws and inclusion of ideological concepts included in the current draft Code of Practice for the Welfare of Dogs and the previously assented Codes.

The Five Domains Model of animal welfare was developed by Professor David Mellor and Dr. Cam Reid, as a framework for assessing animal welfare, and even Mr Mellor is stating that the participation on advisory committees should not be solely academic-based.

In order to correctly draw into question the functionality of the AWAC, Animal Care Australia has reviewed each of the Codes of Practice assented in July 2024 and include our feedback in Appendices 2 through 5.

It is astounding that these Codes not only passed the AWAC but were assented by parliament and also Authorised by the ACT Parliamentary Counsel.

The overwhelming level of misinformation and lack of species expertise is reflected in the fact key stakeholders were not consulted and/or were ignored when they did provide submissions.

Again, Animal Care Australia acknowledges and thanks Mr Bruce Fitzgerald and Mr Childs for their prompt responses and we look forward to providing further consultation with the department/team in the future as Codes of Practice re-commence development.

The review of the AWAC is very much welcomed by Animal Care Australia.

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

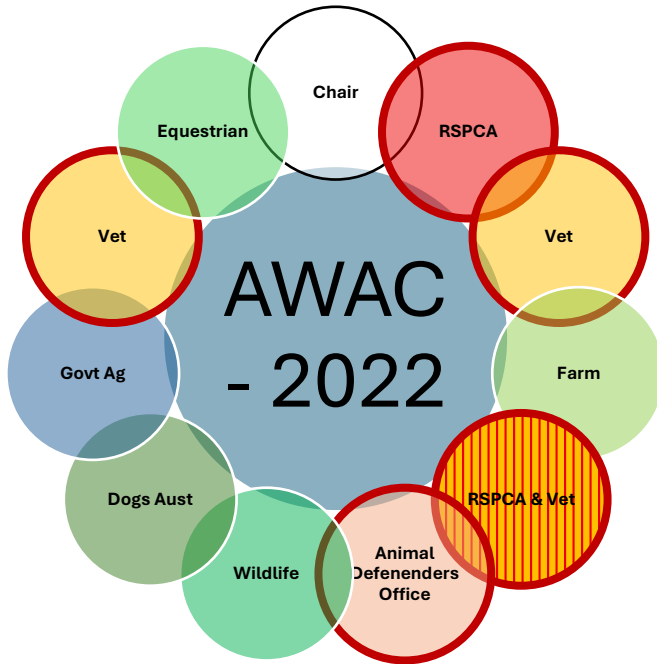
Kind regards,

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

Michael Donnelly
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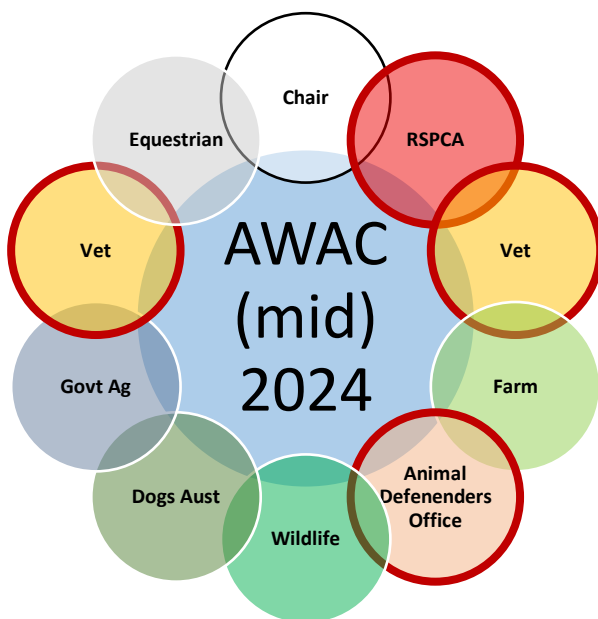
Appendix 1: AWAC ACT structure 2022 – 2025

Note: RSPCA is governed by animal rights ideology policies developed by RSPCA Aust. Australian Veterinary Association is also led by animal rights policy. Animal Defenders Office defends the rights of animals.



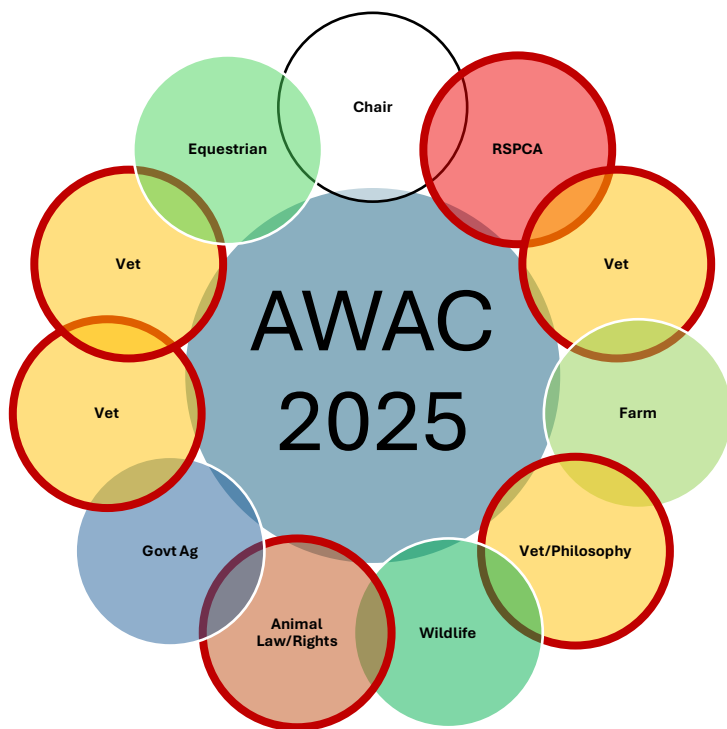
- Ms Genevieve Butler – Chair and Chairperson of the International Air Services Commission
- Ms Michelle Robertson - CEO RSPCA ACT
- Dr Melanie Latter – Australian Veterinary Association
- Dr John Starr - ACT Rural Lessees Association (farming representative)
- Dr Suzanne Fowler – RSPCA Australia and a veterinarian
- Dr Serrin Rutledge-Prior – Phd of Philosophy. Theses: how to better include nonhuman animals within the scope of legal justice. Animal Defenders Office.
- Ms Margaret Peachey - ACT Wildlife
- Ms Judith Woolley – DOGS Australia
- Mr Bruce Hancocks – ACT Department of Agriculture
- Dr Wendy Townsend – a veterinarian, (ACT Chief Veterinary Officer) – appointed as an authorised officer under the Animal Welfare Act
- Mr Wayne Slattery– equestrian and competition show jumper, farrier and horse trainer.

10 Committee members (excl Chair). 3 veterinarians, 2 RSPCA representatives, 1 farmer, 1 wildlife, 1 companion animals and 1 horse, 1 philosopher and 1 Govt employee.
 Key: Follows Animal Rights policy/ideology (if Vet is member of AVA)




- Ms Genevieve Butler - Chair and Chairperson of the International Air Services Commission
- Ms Michelle Robertson – CEO RSPCA ACT
- Dr Melanie Latter - Australian Veterinary Association
- Mr John Starr - ACT Rural Lessees Association (farming representative)
- Dr Serrin Rutledge-Prior - Phd of Philosophy. Theses: how to better include nonhuman animals within the scope of legal justice. Animal Defenders Office.
- Ms Margaret Peachey – ACT Wildlife
- Ms Judith Woolley – DOGS Australia
- Dr Stephanie Pulsford – Ecologist at Environment, Planning & Sustainable Development Directorate (an ACT Govt Department)
- Dr Kyeelee Driver – a veterinarian – Acting Chief Veterinary Officer/trainer
- Mr Wayne Slattery - equestrian and competition show jumper, farrier and horse trainer.

9 Committee members (excl Chair). 2 veterinarians, 1 RSPCA, 1 farmer, 1 wildlife, 1 companion animals and 1 horse, 1 philosopher and 1 Govt employee..
 Key: Follows Animal Rights policy/ideology (if Vet is member of AVA)



Ms Genevieve Butler - Chair and Chairperson of the International Air Services Commission
 Ms Michelle Robertson - CEO RSPCA ACT
 Dr Lindsay Hamilton - Australian Veterinary Association. A veterinarian.
 Mr John Starr - ACT Rural Lessees Association. Farming representative.
 Dr Justin Clarke - nominated by – (ii) an ACT tertiary institution. Australian National University and a veterinarian.
 Ms Yolandi Vermaak – wildlife rescuer for ‘wombat rescue’ – native wildlife
 Mr Naaman Kranz - Principal Lawyer of K & R Animal Law and the Principal Lawyer of the Animal Law Institute – in other words an animal rights advocate.
 Ms Edana Sinclair - nominated by the administrative unit with responsibility for the Nature Conservation Act 2014..
 Dr Kyelee Driver - A person who is an authorised officer under the Animal Welfare Act 1992. A veterinarian – Acting Chief Veterinary Officer
 Dr Hayden Montgomery – Sonza Veterinary Clinic and Boarding Kennels - yet another veterinarian.
 Mr Wayne Slattery - equestrian and competition show jumper, farrier and horse trainer.

11 current committee members only 1 represent actual animal owners – 1 horse trainer/owner. While there are 4 veterinarians, an animal law representative and a person representing land/rural/farming. 1 native wildlife rescuer and 1 representing the Nature Conservation Act. (Govt)

Key:  Follows Animal Rights Policy/ideology (if Vet is member of AVA)

In addition the ‘AWAC Chair’ is actually the Chair of the International Air Services Commission – a person as far independent of animal care as you could likely get and could explain why the inundation of the ideological views has had so much success. Who would question the RSPCA or the Aust. Veterinary Association?

For starters half of the registered veterinarians in Australia do. The AVA has around 8500 members of the currently registered 15,000.

The make-up of this Committee has been extremely academically driven and governed. Most importantly more ideologically policy driven. This raises an even greater concern of what occurs in order to achieve a quorum? The numbers are simply in favour of the veterinarians (all registered AVA members?) on Committee.

Appendix 2: Review of the *Animal Welfare (Welfare of Horses in the ACT) Mandatory Code of Practice 2024*

Animal Care Australia notes this Code applies to all horses, ponies, donkeys and mules that are kept in the ACT, including for the purposes of:

- work (for example, carriage, delivery, stock, trail riding);
- competition (for example racing, eventing, jumping, showing, endurance riding, dressage and camp drafting);
- pleasure riding or driving, including riding schools;
- breeding; and
- pets

Animal Care Australia has consistently argued that regulations relating to horses and their welfare have fallen behind and are not consistent with best practice. Just because something has been carried out consistently in the past doesn't mean it has been in the best interests of the animals.

The age of riding/working a horse and level of workload and training should be determined while taking into consideration, the ongoing study in science-based evidence of horse growth and development and their associated impacts.

While we acknowledge this Code of Practice is a great step in the right direction, we provide the following feedback in order to ensure best practice is being met by the owners of all horses.

Preface on page 1

Horse owners are expected to be familiar with the Animal Welfare Act 1992 and Regulations 2001 and other relevant legislation.

How were horse owners and workers notified of this expectation? A vast proportion of pet owners are not aware of their respective animal welfare acts. It is incumbent on the ACT Government to actively promote not only the existence of the Act and Regulations, but also the expectation of compliance.

First paragraph of page 3

When applying this code in conjunction with existing codes or rules internal to equine organisations and clubs operating in the ACT, the higher welfare standard must always be applied.

Unreasonable. “Must always” is not reasonable in the context it is stated. Firstly, it is unclear if this statement is making the definition of a ‘Guideline’ defunct?

Guidelines are included in this Act for the purpose of improving or providing higher welfare standards. ‘Existing codes’ includes this Code therefore this statement is actually stating ALL (Standards & Guidelines) of the clauses within this document must always be applied.

It should read:

‘When applying other existing codes or rules internal to equine organisations and clubs operating in the ACT, the higher welfare standard should always be applied, in addition to the Standards within this Code.’

This then acknowledges that some organisations may have higher standards that are in place for their members, and this Code still defines the Standards that everyone within the ACT must apply.

Page 5: S1.2

Horses must be able to express normal behaviours such as freely grazing on pasture, grooming, and socialisation, unless there are reasonable grounds not to do so, such as medical conditions or horses in work.

Unreasonable statement. The words “on pasture” should be deleted, as it is completely

unreasonable.

This Standard contradicts Standards and Guidelines that follow, making this impossible to meet. Specifying that every horse must have free access to pasture at all times is unachievable for most horse owners, especially during winter when grass is not growing, or during drought, when the grass can die off for months or years.

It should read:

‘Free access to forage ...’

It is perfectly reasonable to supply horses with hay instead of pasture. Horses need constant access to roughage and dry grass (hay) is a perfectly safe and acceptable substitute for grass.

In fact – providing hay at all times, even when fresh grass is available, provides many health benefits to horses – allowing them to self-regulate their sugar intake. This prevents colic, laminitis, founder and excess weight gain.

Page 5: S1.3

Persons responsible for a horse displaying abnormal or pathological behaviour patterns (stereotypies) such as weaving, crib-biting, windsucking, self-mutilation, pawing, kicking or pacing must obtain the advice of a registered veterinarian or suitably qualified equine professional.

Impractical. Most ‘registered’ veterinarians and some other equine professionals need to be educated on the solutions to these issues and their solutions, before being the mandated experts on them.

Free access to forage at all times, as described above, and ensuring the horse has equine company, would prevent and resolve a large proportion of stereotypies without veterinary intervention.

Therefore, this should read:

‘... the advice of a suitably qualified veterinarian or suitably qualified equine professional.’

Page 5: G1.1

Colts, stallions, weanlings, pregnant and sick animals, or those in advanced age, may require segregation from other groups of horses, to reduce the risk of injury and disease. Attention should be paid to meeting the animals’ social needs through means such as physical barriers which still permit visual contact with their companions (and even limited physical contact where appropriate).

Impractical. This should only apply **to sick animals requiring quarantine.**

Even many sick animals do not need to be segregated from their pair bond, as this will add to their stress, without providing any benefit to either animal.

There is no reason to segregate colts, stallions, weanlings or pregnant mares from their herds. Unnecessary segregation can cause stress. This only creates the future stereotypies that this Code of Practiced aims to resolve.

Page 5: G1.2

Introduction of a new horse or reintroduction of a segregated horse into a group should be supervised until the animals are relaxed and a hierarchy has been established.

Impractical. As this may take weeks or months for some individuals, this guideline is completely out of touch with reality.

Page 5: G1.4

Horses that do not have access to pasture should be provided with other suitable enrichment, such as forage, roughage as fodder, toys, slow feeding hay nets, and companions.

Impractical. The word ‘companions’ should be deleted, as friends are not a substitute for food, and if food is lacking, more animals will create more problems within fighting, resource guarding, and the lower animals on the hierarchy not having their needs met.

Page 6: Note.

‘Geriatric’ is defined on this page – as a horse 20 years of age - but the term is not used here. The term ‘Aged’ is used without a definition. In the horse industry ‘Aged’ is generally considered to be a horse 20 years and older.

In fact, this Code of Practice has no ‘definitions’ section. This is important when multiple terms are used throughout the document that tend to have different meanings (or ages) to different sections of the horse industry.

Page 6: S2.1

The person responsible for the supervision of a horse must be able to recognise signs of ill health and take prompt and appropriate action to obtain a diagnosis and treatment protocol from a registered veterinarian.

Impractical. The way this Standard is worded prohibits any potential new owner from acquiring horses. Even experienced horse people can miss subtle, early signs of ill health when it’s a new condition they have not encountered before.

This should be reworded to read:

‘The person responsible for the supervision of a horse must check daily for signs of good health and to take action should any potential health issues or injuries arise.’

All horse owners know the signs of good health.

Minor cuts and scrapes are very common with horses, and do not require a veterinarian's attention to resolve. Horses can sometimes be off colour for a day or two, especially if passers-by are feeding horses that are not theirs over the fence. These are not veterinary emergencies and should not be mandated to add to the already over worked veterinary industry.

It is reasonable to mandate that a horse not showing signs of good health require close monitoring, and to take action if symptoms do not resolve. ‘Action’ may be first aid applied by the owner, not necessarily a veterinarian.

Page 7: G3.1

Water containers and mechanical water sources should be inspected at least every 12 hours to ensure that they are functioning normally.

Impractical. Complicates and contradicts this Standard:

S3.2 Each individual horse must have access to a sufficient quantity of water to supply their daily needs and maintain good health.

If the horse MUST be supplied with enough water for 24 hours, why does it need to be checked every 12 hours? This also depends on the size of the water container – many people provide water in tanks

or large tubs that hold several days' worth of water. Setting a time limit like 12 hours is unreasonable.

This should apply only to automatic waterers that do not hold a day or more water for the herd.

Therefore, it should read:

'Where water containers or mechanical/automatic waterers could impact maintaining enough water for a daily supply, they should be inspected at least every 12 hours to ensure that they continue to supply sufficient water'.

Page 9 S4.2

Supervision during feeding must be provided to observe behaviour patterns and response to feed.

Ridiculous. "You MUST stand and watch all of your horses eat!"

This must be deleted, as horses generally eat ("feed") for 12 – 16 hours a day, and require eating constantly throughout the day. Mandating that horses should only be fed while they are being supervised will create new welfare issues and many health problems.

A Guideline (NOT a Standard) that states:

'It is advisable to observe your horses at a time when they are feeding in order to notice any possible ill-health or other issues'

leads into the other Guidelines in this section.

Page 9: G4.2

Feed troughs for horses should be well spaced as appropriate for the herd to prevent aggression and allow subordinate animals access to feed. Horses that are in lighter condition and those that are subject to constant bullying should be segregated from the main group during feeding time to prevent choke and allow them to access their feed requirements.

Incorrect. Horses should be 'fed separately', not necessarily 'segregated'.

Segregated means a separate area, yard, stable, tying up or some other facility.

Fed separately can include feed bags, feeding stocks or stations, which are commonly used in groups of horses to allow each horse to eat their own feed without interference from horses they are not segregated from.

Page 9: G4.4

Horses should be fed according to body condition. Body condition score greater than 4 is undesirable for the health of the horse. The efficiency of food utilisation will vary between particular horses and breeds of horses. Most ponies utilise feed efficiently, but, for example, thoroughbred horses require substantially more feed per kilogram of body weight. Overfeeding some horses, particularly idle ponies, can induce laminitis (also known as founder). Animals at risk should be exercised if appropriate, and their intake of food energy reduced to minimal maintenance requirements. Note that horses should never be put on starvation diets to induce weight loss.

Misleading. Founder is NOT a synonym for Laminitis. Founder is an advanced stage of laminitis involving rotation of the pedal bone, and a separate diagnosis to laminitis.

Laminitic or foundered horses **should NOT be exercised** for some time after the obvious signs of laminitis have been resolved (usually weeks or often months).

Page 10: G4.9

*Good quality pastures, **containing suitable grasses and legumes**, can provide most of the food requirements for horses, but in the ACT, supplementation of vitamins and minerals is often required in horses with a purely pasture-based diet due to nutrient deficiencies in the region. Horses doing hard work, those with compromised teeth, aged horses or lactating mares also require nutritional supplementation. In temperate areas including the ACT, where **permanent pastures are fertilised annually**, about 1 hectare (2.5 acres) of pasture for each grazing horse should provide maintenance requirements during years with normal rainfall.*

Legumes are not appropriate 'sole' grazing pasture for horses other than breeding animals and growing young stock. The ideal pasture for your horse combines a mix of grasses, legumes, and cover crops that ensure your horses receive balanced nutrients.

Horses should only have limited access to grazing on "improved pastures" intended for livestock. Newly fertilized pasture can make a horse sick if they graze it too soon, as excess nitrogen can lead to conditions like laminitis or nitrate poisoning. It is recommended to keep horses off fertilized pastures until at least a half inch of rain has fallen to wash the fertilizer off the grass

This standard appears to have been copied from livestock standards and are NOT entirely appropriate for horses.

Page 10: G4.13

*Persons inexperienced in horse care should consult **a registered veterinarian** or an appropriate organisation such as an experienced equine professional about selection of suitable foodstuffs for horses used for a particular purpose.*

This guideline sets up new owners for failure.

Veterinarians are not usually experts in equine nutrition and often give outdated or inappropriate advice for this reason. They should not be listed in the guidelines as the appropriate expert to obtain advice on horse nutrition. Tertiary educated equine nutritionists, or horse feed manufacturers (they have nutritionists on staff) are more appropriate sources of sound advice.

Page 12: G5.4

Stabled horses should be spelled in paddocks at least once a year, for at least two to four weeks.

Misleading. There should be no upper limit on how long a stabled horse is spelled. This guideline should specify the minimum only ie at least once a year. ⁴

Page 13: S6.1

Premises must be designed and maintained to minimise the risk of injury to horses.

Poorly worded. This standard is poorly worded to imply that only designs with the intent to contain horses may be used. This is unreasonable and most stock facilities can be safely adapted to be

⁴ [NSW Department of Primary Industries: NSW Animal Welfare Code of Practice No 3 - Horses in riding centres and boarding stables](#)

used with horses. 'Designed' is subjective and ambiguous when considering a potential risk of injury to horses. The word 'designed' should be deleted.

'Premises must be maintained to minimise the risk of injury to horses'

Page13: S6.6

Horses must not be kept in stalls, stables or other small, confined spaces on a permanent basis, see S6.1 and G6.4.

The cross references mentioned in "see S6.1 and G6.4" have no relevance to this point.

G6.4 Stables, stalls, loose boxes and other structures where horses are housed should have sufficient lighting to permit inspection of a horse.

The point of this Standard is to stop horses being permanently kept in those spaces, and as such **should simply read:**

'Horses must not be kept in stalls, stables or other small, confined spaces on a permanent basis.'

Page 13: G6.1

*Housing horses in stables is not likely to meet the full spectrum of horses' behavioural and social needs. If stabling is used, provision of exercise, time out at pasture, a high fibre diet, **social interaction (such as allowing these horses to see other horses)**, and stimulation through environmental enrichment may reduce stress, boredom and the risk of stereotypic behaviour, and should be provided.*

Social interaction is not *seeing* other horses but *interacting* with them. This is a very important distinction! (This is like comparing the provision of windows to people in nursing homes as a substitute for human interaction)

That section of the paragraph should read:

'...social interaction (including allowing these horses to interact with other horses)...

Page 14: G6.6

All housing should give adequate natural ventilation. Air vents on opposite sides of the structure are preferred. Dust levels in stables and stalls should be kept to a minimum to reduce the risk of respiratory disease.

Misleading. Air vents on opposite sides of the structure are NOT preferred. They should be offset to provide air circulation. Off-set vents are better in stables because they are part of a system that creates superior airflow by using natural convection and strategic placement to reduce drafts. A common design places lower vents on one side for cool air intake and higher, off-set vents on the other side or roof to allow warm, stale air to rise and exit, which is more effective than vents placed at the same level or directly opposite and in the path of horses.

Page 14: G6.11

*Landscape features, such as **rows of** trees, hedges, and gullies, can provide some shelter for horses.*

Misleading. The word "rows" should be deleted as rows are the least suitable layout for trees, as rows create more air turbulence and wind on the lee side of the row than openly spaced or clumps of trees.

Page 15: G7.2

*Electric fencing, properly fitted and maintained, provides a safe and effective barrier to horses, **when used with** conventional post-and-wire and post-and rail fences. Horses should be supervised during the process of being introduced to electric fences, to ensure their education and safety.*

Misleading. Electric fencing provides a safe and effective barrier to horses, **when used with or without** conventional post-and-wire and post-and rail fences. It is common to use electric fencing to create paddock divisions within a property with other external fencing, and this is good practice, and very safe for horses. **The wording of this guideline is not appropriate.**

Given this Guideline is about electric fencing it should simply read:

‘Electric fencing, properly fitted and maintained, provides a safe and effective barrier to horses. Horses should be supervised during the process of being introduced to electric fences, to ensure their education and safety.’

Page 15: G7.3

Double fencing can reduce injuries caused by fencing such that it restricts nose to nose contact between horses.

Misleading and contradictory. This guideline contracts all previous (and following) standards and guidelines supporting social interaction. Separating animals that wish to interact is NOT best practice in horse husbandry. Horses should be kept in herds and not segregated unless quarantine is necessary.

More suitable wording is:

‘Consider using double fencing in areas where they provide extra security for stallions or other valuable horses kept in separate paddocks, or more importantly near public roads, to restrict easy interaction with the public, or from escape onto the road.’

Page 15: G7.5

The strength and height of the fencing is particularly important for stallion enclosures. Fencing should prevent escape and minimise risk to the stallion, other horses, handlers and the general public.

This is a very outdated misconception. Stallions do not require any different care requirements unless the stallion is segregated and denied daily social interaction. This is NOT best practice OR best practice stallion keeping – ensuring they still have daily social interaction and live with other horses, should be described:

‘Consideration should be given for stallions that are required to be segregated and denied physical interaction with other horses. This fencing should have a suitable strength and height to prevent escape. The use of electric fencing or double fencing is also beneficial under these circumstances.’

Page 15: G7.7

Injuries occur more frequently where horses are over-crowded, and facilities are inadequate.

Misleading. Injuries are also common in segregated horses that are denied daily social interaction as they attempt to reach their friends through fencing/stable walls.

‘Horses are social animals and should be maintained in facilities that are appropriate for the breed. Care must be taken to prevent over-crowding or when individual horses want to join the herd while segregated. If not managed appropriately both circumstances can lead to injuries with your horses.’

Page 18: G10.4

Horses clipped during winter should be rugged, except when working or when weather conditions are very mild.

Misleading. Horses with their backs clipped during winter should be rugged. Many horses are partially clipped in winter, usually underneath the belly and neck, or sometimes further up their sides, because they are too hot, obese, or have a medical condition. These horses should NOT be rugged, even though they are *partially clipped*.

This should read:

‘Horses with their backs clipped during winter should be rugged, except when working or when weather conditions are very mild.’

Page 18: G10.7

*Fly veils should be removed overnight where possible. They should not be **word** during severe bushfire risk periods.*

Typo: word should be worn.

Page 19: S11.6

If the owner or person in charge of an animal has reasonable grounds for believing that the animal is infected with an exotic disease or notifiable endemic disease, the person must immediately separate the animal from any other animal that is not infected with the disease.

Confusing. It is not possible for a horse owner to know if another animal is infected with a contagious disease, it is only possible to know if animals are showing signs of disease.

Therefore, this **Standard should read:**

‘If the owner or person in charge of an animal has reasonable grounds for believing that the animal is infected with an exotic disease or notifiable endemic disease, the person must immediately separate the animal from any other animal that is not showing signs of the disease.’

WE COMMEND THE INCLUSION OF G11.5:

Page 20: G11.5

Faecal testing and deworming should be conducted regularly in consultation with a registered veterinarian (recommended four times per year and at a minimum of twice yearly)

Faecal testing before deworming is the only reasonably modern and up to date recommendation that appears in this Code of Practice.

Page 21: G 11.7

Aged and geriatric horses should be assessed by a registered veterinarian or person experienced in the care of horses for general health, and be given a full dental examination and treatment, every 6 -12 months.

Aged and geriatric are considered to be the same within the horse community. An Aged horse is aged from 18 years and older. The Code defines geriatric as 20 years old, and yet the Code continues to use Aged throughout. 'Geriatric' is not necessary, and the definition of 'Aged' should be included within a section for definitions.

Page 21: G11.8

Paddocks used for grazing horses should be managed in such a way that contamination by parasites or other agents is minimised. Good management practices include spelling paddocks for intervals of at least 6 weeks and preferably 12 weeks or grazing with other species such as sheep and cattle.

The time frames here should be deleted as this is dependent upon the standard of pasture management, as well as weather conditions. Overgrazed pastures will need much longer, and well managed ones can be less.

These figures are based on decades old, standardised worming rotation advice that has been scientifically discredited.

Page 22: S12.2

Horses with a hoof injury, overgrowth, infection or laminitis must be provided with appropriate treatment by a registered veterinarian and/or farrier

This should include Podiotherapists. Farriers and podiotherapists do the same job and are both equine hoof care experts. Farriers are trained through apprenticeships and podiotherapists are tertiary educated.

They are similarly qualified, and either can be safely engaged by horse owners/carers to look after their horses' feet.

Page 27: G16.1

Persons responsible for reproductively entire horses should have a breeding program and ensure that mares and stallions are housed separately except for specific breeding purposes. Horses should not be allowed to breed with closely related horses.

This guideline is very outdated. There is no reason for stallions to be permanently segregated from their mares. Outside of breeding season, stallions behave like any other horse, and during breeding season, they can breed naturally as long as the stallion and mares are already familiar and happy with each other.

Stallions should not be placed into paddocks with mares they do not already live with.

This should read:

'Persons responsible for reproductively entire horses should have a breeding program and manage their animals' social needs in a way that meets the animals' individual needs, especially during breeding periods. Prior to breeding, mares and stallions should be slowly introduced to each other. Horses should not be allowed to breed with closely related horses.'

Page28: G16.9

Foals should not be weaned before four months of age.

And **G16.10**

Foals should be weaned before nine months of age

Contentious clauses.

At all times Animal Care Australia will side with the best interests of the animal when determining the welfare needs of the animals.

It is noted that forced (domestic) weaning of foals has occurred for well over a century primarily for the benefit of humans. That is the need to have foals moved on from the paddocks or trained for the roles they might be needed for, such as certain working roles or most commonly for the competition/racing arenas. (4-7 months of age)

Natural weaning occurs (9-14 months) much later than domestic weaning.

It is our position that the minimum age of 4 months is too young and that there should be no maximum age – allowing nature to take its course. It is also our position that the owners of the horses should be encouraged to investigate all of the facts before weaning a foal.

It is clear that current research ⁵ is bringing the animal welfare consequences of early weaning to the forefront. **Forced weaning is not good animal welfare practice.**

That said, Animal Care Australia also acknowledges that it is difficult for any government to change the practices that have existed for man's benefit for such a long period of time, and particularly those related to the racing industry. With that in mind, we are acutely aware that horse owners who are not 'hobby owners' will have been encouraged and will be striving to wean their foals as quickly as possible. Therefore, from a legal perspective and for the enforcement of blatant animal cruelty practices Animal Care Australia agrees a minimum age **MUST** be set.

The science supports that 4 months of age is too young – and this supports setting a minimum age for the purpose of enforcing animal cruelty. However, we do not support setting a maximum age. It should be the mare or foal who decides when the foal will be weaned. Forced weaning (when not used for medical reasons) is not good animal welfare practice and sets animals up for health and behavioural issues that can be avoided.

Guideline 16.10 is not good practice and should be deleted.

It is our strongest recommendation that Guideline 16.9 should be re-worded and made a Standard (mandatory) clause (S 16.5), and to include reference to a replaced G 16.9.

S16.5 Foals should not be domestically weaned before four months of age, unless you have a valid reason, such as under veterinary advice. (refer to G 16.9 for more information)

G 16.9 Wherever possible you are encouraged to allow the mare and foal to determine when is best to be weaned.

Note: Foals are being domestically weaned at ages as young as 4 months. This practice is enabled as common practice and is not good practice. As a responsible horse owner, it is your responsibility to adopt methods that encourage higher welfare outcomes. A foal and mare will naturally wean between 9 and 14 months.

Page 29: S 17.1

Training methods used must be humane and must not cause unreasonable pain or suffering to the horse.

⁵ [National Library of Medicine – domestic weaning research](#)

Animal Care Australia does not see the need for the inclusion of 'unreasonable' within this Standard. Pain should not be inflicted during training.

The circumstances where the occurrence of pain may arise are outlined within G 17.11.

Page 29: G17.1

Training methods should be adapted to suit the needs of the particular horse. They should be fear-free, force-free and rewards based (positive reinforcement).

WE COMMEND THE INCLUSION OF G17.1

Page 29: G17.4

Most horses respond best to firm but gentle techniques and to rewards when the horse responds correctly. People training horses should be confident and instill this confidence in the horses they train.

The terminology can be impossible to comply with. 'firm but' is not necessary. Confidence as it is described here is correct and an appropriate interpretation of the misleading term 'Firm'.

It should read:

'Most horses respond best to confident, gentle techniques and to rewards when the horse responds correctly. People training horses should be confident and instil this confidence in the horses they train.'

Page 29: G17.5

Abnormal physiological and behavioural responses to training and confinement should be recognised and measures taken to correct the suspected cause of them. These responses may include aggression, biting, pawing, kicking, weaving, pacing, crib-biting or windsucking.

Incomplete. Non responsiveness, withdrawal and fear should be added to these signs of abnormal responses. A horse "acting out" is much safer to deal with than the one that becomes quiet and withdraws inwards.

Page 29: G 16.6

Some behavioural management measures may be necessary to establish the hierarchy of a relationship between horses and people. These should be fear-free, force-free and rewards based (positive reinforcement) measures.

Contradictory. The first sentence and second sentence here contradict each other and are impossible to comply with. The first sentence should read:

'Some behavioural management measures may be necessary to reestablish trust and confidence between horses and people. These should be fear-free, force-free and rewards based (positive reinforcement) measures.'

Page 29: G17.7

Horses should only be given training schedules that are suited to their physical capabilities or level of maturity. Basic education of young horses is desirable; however, it should not be strenuous, to reduce risk of injury and growth abnormalities.

Incomplete. What is a young horse? Young horse is not defined at all. What is young varies between person to person, even within the horse industry. This requires a definition.

For best practice, horses should not be started/broken in/ridden before 5 years of age, and larger breeds not before 6 years. This is due to key, weight bearing bones of the horse not being fused with calcium before this age. This should be explicitly stated in the Guidelines. As stated in G17.7 training is desirable and completely appropriate to prepare them for riding once their skeletal system is mature enough.

It should read:

‘Horses should only be given training schedules that are suited to their physical capabilities or level of maturity. Basic education of young horses is desirable; however, it should not be strenuous, to reduce risk of injury and growth abnormalities.

Note: For best practice, horses should not be started/broken in/ridden before 5 years of age, and larger breeds not before 6 years. This is due to key, weight bearing bones of the horse not being fused with calcium before this age.’

Page 30: G17.11 (Ref S17.1)

Training methods and tools that have the potential to cause pain, distress or injury should only be used to protect the safety of the animal itself, another animal, or human; they should be performed/used for the shortest duration possible to stop or prevent the undesirable behaviour.

This Guideline should be deleted or potentially reworded to be a defence in an emergency situation only (such as while rescuing an injured/trapped/frightened horse or being attacked by a horse and defending oneself from harm).

Using training methods or purchasing tools to inflict pain on a horse under the name of “training” should never be condoned by the Act or the Regulations. The inclusion of the terms is not appropriate. Additionally, all tools used with horses “**have the potential to cause pain, distress or injury**” when used incorrectly or inappropriately. This should not be condoned in the Act or the Regulations.

This should read:

‘It is a defence for a person to cause pain, distress or injury to protect the safety of the animal itself, another animal, or humans, during an emergency situation (such as while rescuing an injured/trapped/frightened horse) or when being attacked by a horse and defending those from harm.’

Page 32: S19.1

Before euthanasia or slaughter is undertaken, the person in charge must be able to demonstrate that they have exhausted all possible options including treatment for injury or illness, or transfer of ownership/custody to another person able to provide appropriate care. This does not apply if the delay in euthanasia will result in prolongation of suffering or other adverse welfare outcome.

This standard is outrageous and should be deleted in full. This Standard would be completely unreasonable in context with a rabbit, or a cat or a bird.

Too many animals are currently surrendered or abandoned or sold without disclosure of their health issues due to the cost to treat the conditions. Making it compulsory for loving owners who would do the **right thing** by their horse, within their means, to offload that animal because it becomes illegal

to euthanise their old horse at the only home or family that horse has known is absolutely disgraceful.

Old, injured horses are not able to be rehomed and those that are, are at the highest risk of abuse, neglect and slow, painful deaths in back paddocks.

This Standard reeks of animal rights extremism at the animals' expense and is absolutely shameful.

Owners know what is best for their horses – even the time it takes to '**exhaust all possible options for treatment**' is almost guaranteed to add to the horse's discomfort, pain, distress or fatigue. Exhausting all possible options often adds to a horse's poor welfare outcomes, and many owners already say they regret persisting with their horse's care or treatment longer than they perhaps should have. These owners already have high hopes that their beloved horse will recover, and have no qualms spending on veterinary care, and when the horse doesn't respond to that treatment, they suffer a lot of guilt for persisting.

The best advice for old or sick horses is to euthanise them when they are having a good day. Give them the best day of their life and all the foods they aren't normally allowed to eat, bask in the sunshine, and say goodbye well prepared and without suffering or urgency.

This Standard takes all of that away from the horse's best welfare outcome under the circumstances, as well as the owner's duty as a **responsible animal owner** to be there, with their horse, to the bitter end, rather than being made to pass that off to a stranger.

The owner knows best when its right to euthanise. An outsider doesn't see all the bad days, or the slow decline that breaks the owner's heart, or all the efforts they go to make that horse comfortable. Even a young horse can have hereditary or acquired injuries or illness that reduces their quality of life. Non ridden horse homes are very hard to come by at the best of times and its very unfair on the horse to make the most vulnerable horses in our national herd at greater risk by such a thoughtless law change.

This Standard Must be deleted in full to ensure it does not result in frivolous prosecutions of responsible animal owners and a rapid decline in horse welfare in the ACT.

Animal Care Australia calls into question the following Clauses which appear to all be saying the same thing.

S11.1 Horses that are sick, suffering, injured or diseased must be provided with prompt veterinary or other appropriate treatment as required under section 6B of the ACT Animal Welfare Act 1992. As per Animal Welfare Act 1992 Act, appropriate, in relation to an animal means "suitable for the needs of the animal having regard to the species, environment and circumstances of the animal"; treatment includes veterinary treatment, including preventative treatment, if a reasonable person would expect veterinary treatment to be sought in the circumstances.

S2.1 The person responsible for the supervision of a horse must be able to recognise signs of ill health and take prompt and appropriate action to obtain a diagnosis and treatment protocol from a registered veterinarian.

But is also duplicated in

S11.4 Horses must receive regular health checks and treatment as appropriate, see S11.1.

We question why this triplication is necessary? By having 3 standards a person could be accused of not meeting, they can effectively be charged thrice for the same offence – even while they contradict each other (S11.1 specifies whether the treatment is warranted, while S2.1 and S11.4 do not)

Appendix 3: Review of the *Animal Welfare (Keeping and Breeding of Ferrets in the ACT) Mandatory Code of Practice 2024.*

Page 4:

Definitions for this Code:

It is clear that no one was paying attention to these definitions, given the following all refer to ‘dogs’ and not ferrets:

*Carer – a carer can be, for example, a **dog** owner, commercial **dog** walker, or person who has the **dog** in their current control.*

*Owner – an owner of a **dog** can be a keeper, carer, handler, breeder, or purchaser. Each comes with their own responsibilities.*

*Responsible ownership – an owner or carer is responsible for every stage and for all aspects of a **dog’s** life, from birth to death.*

Page 7 - G 2.7

*“...Ideally a layer of absorbent substrate should be placed under the paper or **straw** to absorb moisture.”*

Straw is not recommended for use with ferrets as its ability to release moisture can be limited, potentially leading to higher moisture retention and increased pathogen growth (fungal and mould) and subsequently is found to lead to respiratory and skin health issues.

Page 8 - S 3.2

What is this Standard? It is missing.

Page 8 - G3.3

*“Ferrets should be allowed to familiarise themselves with any new experience or environment. They should also be socialised with other ferrets, **ideally of the same litter** and humans when it is safe to do so.”*

This is incorrect. Ferrets do not need to be introduced or socialised with members of the same litter. In fact, common sense dictates they are born with and regularly interact (socialise) with members of their same litter. The entire point here is to introduce them to ‘other’ ferrets.

Page 12 - S6.5

*“**All female** ferrets must be desexed or have their reproductive cycles managed by a veterinarian.”*

Again, this is not correct. It should state: “**Non-breeding** females...” this then makes the rest of this Standard appropriate: “...*If this is not appropriately managed ferrets can develop conditions with their reproductive system which can be fatal. Female ferrets who are not bred may develop health concerns related to recurring heat cycles (hyperoestrogenism).*”

Equally how is this enforced as a mandatory requirement? If a ferret a female ferret's reproductive cycle is a prolonged period which can continue for up to 5-6 months if she isn't mated - at what intervals does this requirement become a breach of the Code? A vet visit monthly, before, during or after the cycle? This should NOT be a mandatory standard. It should be a Guideline.

Page 13 – G 6.6

“Ferrets do have a strong scent. This is not to do with their anal glands (as some people believe). Having the anal glands removed will not affect their scent. There are two ways of reducing the scent:

a) have your ferret desexed; and

b) wash their bedding often”

This is missing an important inclusion:

c) The type of diet plays an important role in their scent.

Page 16 - S9.5

“A person responsible for a ferret must not allow the ferret to mate with its sibling or parent.”

This is not a concern in ferrets.

Australian biosecurity regulations prohibit the importation of ferrets and keeping of ferrets for private ownership is also limited and interstate importation is also limited. Therefore, it may be necessary in order to maintain or strengthen genetic viability or if a breeder was aiming for specific recessive traits with limited gene pool.

If there is a concern, this should be a Guideline - not a mandatory standard.

Appendix 4: Review of the *Animal Welfare (Keeping and Breeding of Guinea Pigs in the ACT) Mandatory Code of Practice 2024*.

Page 3:

“Under the Nature Conservation Act 2014 you are required by law to be the holder of a licence to import, keep, sell, or export guinea pigs, and you must apply for a licence before obtaining a guinea pigs. Licences under Chapter 11 of the Nature Conservation Act 2014 can be submitted online and are valid for three (3) years.”

According to the ACT Government website ⁶ Guinea Pigs are exempt from requiring a license. Nature Conservation – Exempt Animals Declaration Schedule 1 (mammals) Guinea Pig, Cavy (Domestic) - *Cavia porcellus* ⁷ confirms this.

Under section 155 of the NC Act, the Conservator of Flora and Fauna (the Conservator) is responsible for making an exempt animal declaration, which exempts the animal from licensing requirements relating to the keeping or trade (sale, import, export etc.) of an animal. The exemption does not apply to the capture of native animals or release of any animal which does require a licence.

This section requires correction.

Page 4:

*“In the case of a Guinea Pig for whom a new home has been found that information should cover diet, accurate sex of the guinea pig, when to desex and **vaccinate, worming, grooming, housing, identification, and general health care.** Providing this code to the new carer is advisable.”*

Incorrect. There are no vaccines available for Guinea Pigs. When it comes to worming a guinea pig, even the RSPCA questions the need to regularly worm:

“In general, guinea pigs do not need to be regularly wormed unless your guinea pigs’ vet confirms they have worms, as intestinal parasites are uncommon in guinea pigs. This is despite common advice that they should be wormed every three months.” ⁸

Page 4:

Definitions for this Code:

It is clear that no one was paying attention to these definitions, given the following all refer to ‘dogs’ and not Guinea Pigs:

*Carer – a carer can be, for example, a **dog** owner, commercial **dog** walker, or person who has the **dog** in their current control.*

*Owner – an owner of a **dog** can be a keeper, carer, handler, breeder, or purchaser. Each comes with their own responsibilities.*

*Responsible ownership – an owner or carer is responsible for every stage and for all aspects of a **dog’s** life, from birth to death.*

The following definitions should be included in the definitions:

Boar – an adult male Guinea Pig.

Pup – a young Guinea Pig as part of a litter.

Sow – an adult female Guinea Pig

⁶ [Keeping and Selling Animal in the ACT](#)

⁷ [Nature Conservation – Exempt Animal Declaration](#)

⁸ [RSPCA Knowledgebase](#)

Page 6: S2.2

*Guinea pigs **must be kept in a cool area** and must not be exposed to high temperatures to avoid heat stress and exhaustion.*

This is extremely misleading and not entirely accurate. Guinea Pigs also need warmth/heat during colder months – especially in regions that experience very low temperatures – such as the ACT.

Page 6: G2.2

Siblings from the same litter can be housed together for up to three months, at this point males and females would need to be separated or desexed to prevent breeding and fighting.

Incorrect. Guinea Pigs can breed from as early as 4 weeks of age (though 8 weeks is more common) and sexes should be separated from this age. Desexing at this age can assist but it is recommended to desex between 4-6 months of age.

Thankfully, this is only a Guideline – BUT it is extremely misleading and will result in more unwanted litters if treated as gospel by a new owner.

Page 7: G2.7

*Guinea pigs may be either housed in outdoor hutches or enclosures or live indoors where they can be trained to use a litter tray. Litter trays should be lined with wood or paper-based litter or hay **or straw**; other types can be harmful if ingested by guinea pigs.*

Incorrect. You should not use straw for guinea pigs. Straw has poor nutritional value and may contain mites or fungi, while also being coarse enough to cause skin or eye injuries. The ability of straw to release moisture can be limited, potentially leading to higher moisture retention and increased pathogen growth (fungal and mould) and subsequently is found to lead to respiratory and skin health issues. An odour reducing bedding is best, and a fresh handful of hay daily to eat. Good quality hay is beneficial for eating too.

Page 9: G3.1

*Guinea pigs should be introduced gradually to accessories such as **harnesses**, transport cages, or **exercise balls**. The use of positive reinforcement with treats or other positive reward system can help with acclimatising guinea pigs to new items in their environment and new experiences.*

Incorrect. Guinea Pigs MUST NOT use exercise balls or harnesses. Using an exercise ball is extremely dangerous for them and can cause serious, potentially fatal, injuries to their backs and feet due to their delicate anatomy and fragile spines. You cannot safely walk a Guinea Pig on a harness, as it is extremely dangerous for their delicate, fragile spines and can cause serious injury or paralysis if they dart or struggle against the leash.

Page 9: G3.2

*Some owners **may wish to exercise their guinea pig with a harness and a lead**. Before taking a guinea pig outdoors or into a public space, the guinea pig should be trained to accept a harness. The lead should be attached to a harness and collars must not be used.*

Incorrect. As above – NO harness. Also, Guinea pigs are prey animals and do not need to be walked like dogs; instead, they should be given supervised time to explore their environment safely in an enclosed pen or within a secure home environment.

Page 12 – Notes:

Note: Roughage also helps to maintain the health of teeth and prevent behavioural problems related to boredom such as hair pulling and barbering. A guinea pig's teeth grow

*continually and chewing prevents teeth from overgrowing. **Lucerne and clover hay are not suitable for guinea pigs as they are too high in calcium and protein.***

Partially correct: Lucerne and clover hay are not suitable for ADULT Guinea pigs due to being high in calcium and protein. However, clover hay 'can be' served in small amounts to juvenile or pregnant guinea pigs, while lucerne (alfalfa) is able to be fed to young (under 6 months of age) and pregnant and nursing sows as they require a higher amount as the extra calcium helps the bone development.

It is recommended that adult guinea pigs should have unlimited access to high-fibre grass hays like Timothy, Oaten, or Meadow hay, with lucerne hay offered only occasionally as a treat in small amounts as these are high in fibre and have lower calcium and protein levels.

Page 13: G5.9

Note: Spinach, beetroot, corn, rhubarb, beans, peas, bread, and nuts should not be fed to guinea pigs.

Partially correct:

Spinach: can be fed in moderation, but it should not be a daily food because it is high in calcium and oxalates, which can lead to bladder stones. Offer a few leaves, a couple of times a week at most.

Corn: fresh, raw corn, including the kernels, husks, and silks, as an occasional treat, but it should be given in moderation due to its high sugar and starch content. While the husks and silks offer fiber and can be given more frequently, the starchy kernels should be limited to a few at a time

Beans and Peas: can be fed FRESH raw green beans and pea pods as an occasional treat, but avoid other dried, cooked, or high-starch beans and peas, as they are harmful. Green beans provide beneficial Vitamin C, fiber, and other nutrients, but they contain oxalic acid. FRESH, raw peas and their pods should be fed in moderation, about 1-2 peas per pig a few times a week, as they contain Vitamin C. However, avoid dried peas, So moderation is key.

Page 15: G 6.2

Health care for guinea pigs should include regular:

- a) *Worming*
- b) *Vaccinations*
- c) *Heartworm prevention*
- d) *Flea control.*

Incorrect.

- a) When it comes to worming a guinea pig, even the RSPCA questions the need to regularly worm.
- b) There are no vaccines available for Guinea Pigs.
- c) Guinea Pigs do not need heartworm prevention because they are not susceptible to the disease.
- d) Guinea Pigs MIGHT need flea control if they live in an environment where fleas are a risk, such as with other pets that do get fleas.

Page 15: G 6.3

Guinea Pigs should be desexed around 6 months of age or provided with a reliable hormone contraception under the recommendation of an experienced veterinarian. Guinea Pigs who are desexed will not produce unwanted litters, are less aggressive and have a milder scent.

Let us pull this entire Guideline apart:

Guinea Pigs should be desexed around 6 months of age ...

It is recommended de-sexing between 4-6 months of age.

... or provided with a reliable hormone contraception under the recommendation of an experienced veterinarian.

This is an absolute last resort as hormonal treatments can have significant side effects and health risks. While research has been done on hormonal and non-hormonal contraceptives for guinea pigs in a scientific context, these are not available or advisable for use in pet guinea pigs and require specialised veterinarian knowledge to administer safely and effectively.

Animal Care Australia strongly argues most veterinarians would classify themselves as 'experienced' HOWEVER, this does not make them qualified or a specialist in this area of veterinary medicine. In fact, the use of hormonal contraception requires a referral by a veterinarian to a specialised 'exotic/small mammals' veterinarian. Therefore, we question the need for inclusion in the Code of Practice.

... Guinea Pigs who are desexed ... are less aggressive and have a milder scent.

This applies to adult males (boars) only. Good, clean husbandry and a good diet will also achieve this.

Of course, desexing both sexes DOES stop unwanted litters – IF they are desexed early enough.

Page 17: Microchipping

Guinea pigs should be micro-chipped by a suitably qualified person such as a veterinarian experienced in the care of guinea pigs. Details of the microchip should be registered on a national microchip database.

While Animal Care Australia supports the ideology behind this. The reality is there are only 2 recognised national databases:

- Central Animal Records (CAR): One of Australia's largest private microchip databases, it serves as a key registry for many veterinarians and animal welfare groups.

The Central Animal Records (CAR) database is for dogs, cats, and horses, not guinea pigs.

- Australasian Animal Registry (AAR): Another major private registry that holds many microchip records.

The Australasian Animal Registry (AAR) can keep details for guinea pigs, as they accept any animal that can be microchipped, including guinea pigs.

- The NSW Pet Registry – A State-registry utilised by the Australian Capital Territory as the ACT does not have its own state registry. The ACT does rely on private registries such as HomeSafeID – which has since closed.

The NSW Pet registry is for cats and dogs only. NB: Victoria's microchip databases are for dogs and cats, not guinea pigs.

If the Code of Practice insists on pushing microchipping of any pet small mammals – it should be clearer as to which database to enter the details – ie: the Australasian Animal Registry. Otherwise, these Guidelines provide a false sense of security' to novice/new owners.

It should equally be noted the vast majority of guinea pig owners do not microchip as they believe proper escape-proof housing is sufficient.

Pages 18-20: Breeding:

S9.2 Female guinea pigs must not be mated before 9 months of age.

Incorrect. A female (sow) guinea pig should be mated for the first time between 4 to 7 months of age. For a male (boar) guinea pig, a first breeding is appropriate around 3 to 4 months of age, once they are fertile and mature enough to mate.

It has long been believed female guinea pigs pubic bones fuse together after 9 months of age, which can lead to life-threatening complications during birth. It should be noted that this is now in question following research indicating any fusing might occur at a later age and in some cases not at all.⁹

Regardless of whether ‘fusing’ occurs or not – this **Standard contradicts Guideline 9.3 which states they should have their first pregnancy before 6 months of age.**

Animal Care Australia strongly supports owners should be following the internationally recommended breeding ages for a sow (4-7 months) and a boar (3-4 months)

S9.4 A person must only allow a guinea pig to breed if:

- a) they have obtained veterinary confirmation of the guinea pig’s age, physical and genetic suitability for breeding; and*
- b) the person has the facilities and knowledge to care for the female and **kits** properly; and*
- c) the person has pre-arranged suitable and responsible homes for the **pups**; and*
- d) the person is able to correctly identify the sex of any offspring and separate them into male and female groups to prevent unwanted breeding or has pre-arranged for this to be done by a veterinarian.*
- e) the person’s own lifestyle, recognising that it takes time and energy and a significant financial outlay to produce, raise and find homes for every litter.*

Really?

Firstly, can we correctly identify young guinea pigs as ‘pups’ and not ‘kits.’

S9.4 c) is immeasurable by means of enforcement. What happens when a litter is born – following the Standards of this COP – and because the owner did not have their guinea pigs desexed until the recommended age they still have an accidental litter?

Remember: they can breed from as young as 4 weeks of age and yet should not be desexed until 6 months (by this COP) and 3 months by internationally recognised recommendations. That is a gap of anything between 2 – 5 months where an owner may be held in breach of the Code through no fault of their own.

S9.4 c) MUST be made a Guideline and not a Standard.

S 9.4 e) is an outrageous overreach! How is this to be enforced? Will a guinea pigs owner be required to present financial reports on their daily income and expenses in order to prevent a charge of animal cruelty being brought against them?

S9.6 A person responsible for a guinea pig must not allow the guinea pig to mate with its sibling or parent.

This is incorrect. Appropriate wording is ‘should not.’ While it is strongly recommended not to breed with a parent or sibling, it is required for ‘linebreeding.’ The goal is to reinforce and maintain specific desirable traits, such as coat colour or temperament, within a family or lineage or for breeding in order to breed out undesirable recessive traits, like genetic defects and reduced fertility. Careful record-keeping and periodic introduction of unrelated bloodlines are also essential to preserve genetic diversity and overall health. Therefore, this should be a Guideline and not a

⁹ [Vet Help Direct – Fusing pelvic bones in guinea pigs](#)

mandatory standard – or as with other species have the addition of .. ‘be carried out under veterinary supervision’.

Guidelines G9.3

Guinea pigs can reach sexual maturity from 6-8 weeks of age. If they are to be bred, female guinea pigs should have their first pregnancy before 6 months of age, after 6 months the pelvic bones fuse, which can cause serious problems with birthing. Guinea pigs can successfully breed at any time of the year.

This SUPPORTS our position on S9.2 and contradicts that Standard.

Note: While considering some of the conditions set out within the Code of Practice, Animal Care Australia sought the advice of a cavy expert. Which is what the ACT Government/AWAC should have done.

Appendix 5: Review of the *Animal Welfare (Keeping and Breeding of Rabbits in the ACT) Mandatory Code of Practice 2024*.

Page 3:

“Under the Nature Conservation Act 2014 you are required by law to be the holder of a licence to import, keep, sell, or export rabbits, and you must apply for a licence before obtaining a rabbit. Licences under Chapter 11 of the Nature Conservation Act 2014 can be submitted online and are valid for three (3) years.”

According to the ACT Government website ¹⁰ Guinea Pigs are exempt from requiring a license. Nature Conservation – Exempt Animals Declaration Schedule 1 (mammals) Rabbit (Domestic) - *Oryctolagus cuniculus*¹¹ confirms this.

Under section 155 of the NC Act, the Conservator of Flora and Fauna (the Conservator) is responsible for making an exempt animal declaration, which exempts the animal from licensing requirements relating to the keeping or trade (sale, import, export etc.) of an animal. The exemption does not apply to the capture of native animals or release of any animal which does require a licence.

This section requires correction.

Page 4:

*In the case of a rabbit for whom a new home has been found that information should cover diet, accurate sex of the guinea pig, when to desex and vaccinate, **worming**, grooming, housing, identification, and general health care. Providing this code to the new carer is advisable.*

Incorrect. When it comes to worming a pet rabbit, it is not considered to be a requirement to regularly worm:

“Intestinal worms rarely cause problems in pocket pets therefore routine worming is not required.” ¹²,

*“Worming & Other Parasites Routine intestinal deworming of rabbits in not required in Australia.”*¹³

Page 4:

Definitions for this Code:

It is clear that no one was paying attention to these definitions, given the following all refer to ‘dogs’ and not rabbits:

*Carer – a carer can be, for example, a **dog** owner, commercial **dog** walker, or person who has the **dog** in their current control.*

*Owner – an owner of a **dog** can be a keeper, carer, handler, breeder, or purchaser. Each comes with their own responsibilities.*

¹⁰ [Keeping and Selling Animal in the ACT](#)

¹¹ [Nature Conservation – Exempt Animal Declaration](#)

¹² [VetWest](#)

¹³ [Orange Vet](#)

*Responsible ownership – an owner or carer is responsible for every stage and for all aspects of a **dog's** life, from birth to death.*

The following definitions should be included in the definitions:

Buck – an adult male rabbit.

Doe – an adult female rabbit.

Kit/kitten – a young rabbit as part of a litter.

Page 7: G2.11

Rabbits should be kept out of direct contact with wild rabbits (i.e., avoiding nose to nose contact), to reduce the transmission of rabbit fleas which can transmit Myxomatosis.

This should be extended to note measures should be taken to prevent other insects, particularly mosquitos from coming into contact with your rabbit – such as by covering outdoor hutches with mosquito netting, using vet-approved flea treatments for your rabbit and other household pets, and limiting outdoor access during peak insect activity. Keeping rabbits indoors or limiting their exposure is the most effective strategy.

Animal Care Australia acknowledges G 2.12 (d) does state the inclusion of mesh on an outdoor enclosure – but that is insufficiently covered when mentioning dealing with the prevention of the known transmitters of Myxomatosis.

Page 9: S 3.2

This Standard is blank/missing?

Page 9: S 3.3

*‘*How to handle a rabbit:’*

*Rabbit should be picked up with two hands, one under the chest with the fingers and thumb enclosing the front legs, and one supporting the hind quarters. They must **never be picked up by the legs or tail**. Incorrect handling of rabbits can result in serious injury to the rabbit and the handler.*

This must include ‘ears.’ It is mind blowing that the most important part of their anatomy that should not be picked up is missing.

Page 9 G3.1

*Rabbits should be introduced gradually to accessories such as harnesses, transport cages, or **exercise balls**. The use of positive reinforcement with treats or other positive reward system can help with acclimatising rabbit to new items in their environment and new experiences.*

Incorrect. Rabbits MUST NOT use exercise balls. Using an exercise ball is extremely dangerous as it is unsafe and can lead to serious injury or paralysis due to a rabbit's fragile spine and hopping gait.

Page 11: G4.14

Washing your rabbit too often is not recommended due to the risk of increasing oil production under the skin. At most, rabbits should be washed once per month with a rabbit specific shampoo.

Misleading: This implies a rabbit should be washed. You should not bathe a rabbit because it is extremely stressful and dangerous, leading to potential injury from thrashing, hypothermia from wet fur, and respiratory issues. Rabbits are self-groomers and rarely need a full bath; spot cleaning with a damp cloth or pet wipe is the preferred method for dealing with small dirty areas. Regular grooming, keeping its environment clean, will keep the rabbit clean. Only a veterinarian should ever instruct you to bathe a rabbit, and even then, it is typically a partial bath only for reasons such as illness or extreme age. Only then should you use a rabbit specific dry shampoo.

Also, the *rabbet* needs to be corrected to rabbit.

Page 12: S5.3

*Rabbits must be provided with adequate Vitamin C to maintain good health. **Rabbits are unable to synthesise vitamin C (ascorbic acid) and require a daily and reliable dietary source of vitamin C.***

Incorrect. A false claim. Rabbits are able to synthesize their own vitamin C (ascorbic acid) in their liver from glucose, unlike guinea pigs which have lost this ability and require vitamin C from their diet. While some sources suggest that supplementation may be beneficial during times of stress the stated '*Require a daily source of vitamin C*' could equally make a rabbit sick from too much Vitamin C. A balanced diet of hay, fresh leafy greens, and safe vegetables provides adequate Vitamin C for a rabbit.

This should be noted as part of **G5.2:**

A combination of fresh leafy greens and small amounts of citrus fruit or kiwi fruit each day are reliable sources of vitamin C. Vitamin C supplements placed in drinking water or included in pelleted feeds are less reliable as the vitamin quickly degrades when exposed to organic matter or when it comes into contact with metal.

Rabbits can get sick from too much Vitamin C, as they naturally produce it and do not require dietary supplements. Excessive intake can lead to health problems such as digestive issues, nutrient absorption interference, and strain on the kidneys. A balanced diet of hay, fresh leafy greens, and safe vegetables provides adequate Vitamin C for a rabbit. Therefore, G5.2 should additionally state that supplements should only be used when advised.

Page 13: G5.7

Note: Spinach, beetroot, corn, rhubarb, beans, peas, bread, and nuts should not be fed to rabbits.

Mostly correct:

Spinach: can be fed in moderation, but it should not be a daily food because it is high in calcium and oxalates, which can lead to bladder stones. Offer a few leaves, no more than once or twice a week at most.

Page 14: G 6.2

Health care for rabbits should include regular:

- a) Worming***
- b) Vaccinations*
- c) Heartworm prevention***
- d) Flea control*

a) Worming: As we have already ascertained above, When it comes to worming a pet rabbit, it is not considered to be a requirement to regularly worm – only when advised by a veterinarian for a specific reason.

c) Heartworm prevention: Rabbits do not need heartworm prevention because they are not susceptible to heartworm disease, even if exposed to infected mosquitoes.

Page 17: G8.1

Rabbits should be micro-chipped by a suitably qualified person such as a veterinarian experienced in the care of Rabbits. Details of the microchip should be registered on a national microchip database.

While Animal Care Australia supports the ideology behind this. The reality is there are only 2 recognised national databases:

- Central Animal Records (CAR): One of Australia's largest private microchip databases, it serves as a key registry for many veterinarians and animal welfare groups.

The Central Animal Records (CAR) database is for dogs, cats, and horses, not rabbits.

- Australasian Animal Registry (AAR): Another major private registry that holds many microchip records.

The Australasian Animal Registry (AAR) can keep details for rabbits, as they accept any animal that can be microchipped, including rabbits.

- The NSW Pet Registry – A State-registry utilised by the Australian Capital Territory as the ACT does not have its own state registry. The ACT does rely on private registries such as HomeSafeID – which has since closed.

The NSW Pet registry is for cats and dogs only. NB: Victoria's microchip databases are for dogs and cats, not rabbits.

If the Code of Practice insists on pushing microchipping of any pet small mammals – it should be clearer as to which database to enter the details – ie: the Australasian Animal Registry. Otherwise, these Guidelines provide a false sense of security' to novice/new owners.

Page 18: Breeding:

S.9.2 Female Rabbits must not be mated before 9 months of age.

Incorrect. This is dependent on the breed of the rabbit.

You should breed a female rabbit (doe) based on her breed and maturity, with:

- small breeds ready around 4-5 months,
- medium breeds at 6-7 months, and
- large/giant breeds at 8 months or older.

S9.4 A person must only allow a rabbit to breed if:

- a) *they have obtained veterinary confirmation of the rabbit's age, physical and genetic suitability for breeding; and*

Not required. An unhealthy rabbit is easily identified and as such should be seen by a veterinarian, therefore it is not necessary for a healthy rabbit to be seen by a vet. ‘

A veterinarian can only provide a rough estimate of a rabbit's age by assessing physical cues like size, ear toughness, and heel condition, but accurately determining a rabbit's exact age is very difficult. They can typically only differentiate between very young, adult, and elderly rabbits, as there are few reliable age markers in living rabbits.

Which leave genetic suitability – which is at best speculative.

Therefore, Animal Care Australia recommends S9.4 could be included as a Guideline but no one should be mandated to have their rabbit consulted by a veterinarian before breeding them. This is more revenue raising than health raising.

S9.7 Breeding animals must not be permanently removed from its mother until it is 6 weeks of age and eating solid food, unless on veterinary advice.

Not recommended by responsible breeders. Ideally kits should not be removed until 8-9 weeks of age. This should be adjusted to read:

“... removed from its mother until it is weaned and eating solid food (approx. 6-9 weeks of age subject to the breed), unless on veterinary advice.”

Page 19: G9.2

*Keepers of entire rabbits should be aware that males (bucks) can reach sexual maturity **from 6-8 weeks of age**. If they are to be bred, female rabbits should have their first pregnancy **before 6 months of age, after six (6) months of age**.*

Say what?

As previously stated above the breeding age of female rabbits is determined by the breed.

While a male rabbit (buck) can reach sexual maturity at around 8 weeks of age it is again subject to the breed.

Therefore, this Guideline would be far easier to understand if it simply stated:

“Separating young males and females by 8 weeks of age is vital to prevent unwanted litters, especially since young males can become sexually active very quickly. Your doe should not have her first pregnancy until she is mature enough, as per below:

- small breeds ready around 4-5 months,
- medium breeds at 6-7 months, and
- large/giant breeds at 8 months or older”

Page 19: G9.7

Kits will be born fully furred, eyes open, active and can consume semisolid feed immediately as well as suckling milk from the sow.

and **G9.8**

A varied semi-solid diet should be available to kits within hours of birth to ensure they become accustomed to eating a range of food. Hay, rabbits pellets and small amounts of vegetables are suitable to feed from a young age

Incorrect. Firstly, the mother is a doe not a sow, and they are born hairless, blind, and completely dependent on their mother **for about three weeks**. They remain in a nest while their eyes open (around 10-12 days), a fine coat of fur grows in, and they develop enough to **gradually start consuming solid food**, such as hay and pellets, **around three weeks of age**.

These points are correctly included in G 9.12 and G 9.14 – making 9.7 and 9.8 contradictory.

Page 19: G9.9

Large open water containers are not appropriate for pups as they can drown or become soaked and cold, encouraging pups to use a sipper water bottle is ideal. Ensure it is low enough for pups to reach from birth.

and **Page 20 G9.18**

Pups are best raised where they have extensive contact with their carer to ensure that they will be well socialised as pets.

Oops – wrong species: they are kits not *pups*!

Page 20: G9.19

Kittens should be weaned, vaccinated (at five weeks), and wormed prior to re-homing.

Five weeks of age is subjective to the strain being vaccinated against. This should exclude the ‘five weeks’ and simply require kittens to be vaccinated prior to rehoming.

Page 21: G9.21

A person should only permanently remove a kit from their mother if the pup has reached 3 weeks of age except under veterinary advice.

Not recommended by responsible owners. We have already stipulated the kits (not pups) are just moving to solid foods at around 3-4 weeks of age. This should read:

“A person should only permanently remove a kit that is under 3 weeks of age from their mother under veterinary advice. Kits should be removed once fully weaned and eating solid foods.”

Appendix 6: Review of the *Animal Welfare (Keeping and Breeding of Rats and Mice in the ACT) Mandatory Code of Practice 2024*

Page 3:

“Under the Nature Conservation Act 2014 you are required by law to be the holder of a licence to import, keep, sell, or export rabbits, and you must apply for a licence before obtaining a rat/mouse. Licences under Chapter 11 of the Nature Conservation Act 2014 can be submitted online and are valid for three (3) years.”

According to the ACT Government website ¹⁴ Rats and Mice (Domestic) are exempt from requiring a license. Nature Conservation – Exempt Animals Declaration Schedule 1 (mammals) Fancy Mouse (Domestic) & Mice –laboratory varieties (Domestic) - *Mus musculus* and Fancy Rat (Domestic) & Rats – laboratory varieties - *Rattus norvegicus* ¹⁵ confirms this.

Under section 155 of the NC Act, the Conservator of Flora and Fauna (the Conservator) is responsible for making an exempt animal declaration, which exempts the animal from licensing requirements relating to the keeping or trade (sale, import, export etc.) of an animal. The exemption does not apply to the capture of native animals or release of any animal which does require a licence.

This section requires correction.

Page 3: General Guidelines:

In the case of a rodent for whom a new home has been found that information should cover diet, accurate sex of the rodent, when to desex and vaccinate, worming, grooming, housing, identification and general health care. Providing this code to the new carer is advisable.

Incorrect. When it comes to worming a pet rabbit, it is not considered to be a requirement to regularly worm:

“Intestinal worms rarely cause problems in pocket pets therefore routine worming is not required.” ¹⁶,

You do not need to vaccinate pet mice or rats.

Page 4:

Definitions for this Code:

It is clear that no one was paying attention to these definitions, given the following all refer to ‘dogs’ and not rats/mice:

*Carer – a carer can be, for example, a **dog** owner, commercial **dog** walker, or person who has the **dog** in their current control.*

*Owner – an owner of a **dog** can be a keeper, carer, handler, breeder, or purchaser. Each comes with their own responsibilities.*

*Responsible ownership – an owner or carer is responsible for every stage and for all aspects of a **dog’s** life, from birth to death.*

¹⁴ [Keeping and Selling Animal in the ACT](#)

¹⁵ [Nature Conservation – Exempt Animal Declaration](#)

¹⁶ [VetWest](#)

The following definitions should be included in the definitions:

Buck – an adult male rat or mouse.

Doe – an adult female rat or mouse.

Kit/kitten – a young rat or mouse as part of a litter. NB: Baby rats can also be called pups.

Pinky – a newborn mouse usually prior to obtaining fur.

Neuter - surgically remove the testicles (called castration) to prevent it from reproducing and to reduce hormonal aggression, allowing it to live peacefully with other males or females.

Spay - where the ovaries and uterus are removed. This procedure helps prevent unwanted litters and can lead to a calmer, less aggressive pet.

Page 6: G2.2

Siblings from the same litter can be housed together for up to 4 weeks, at this point males and females would need to be separated or desexed to prevent breeding and fighting.

Incorrect.

Rats have not been weaned at 4 weeks of age so should not be separated until at least 5 weeks of age. Desexing male rats is recommended at 4 to 6 months. Female rats can be desexed as young as 3 months, although the recommended age is 4 to 6 months.

Mice are weaned at 3 weeks of age so should be separated after 21 days of age. Desexing of **males** should occur at this age. You generally do not need to desex a female mouse unless there is a specific reproductive health problem, as the surgery is not routinely recommended due to the mouse's small size and the risks associated with anesthesia.

Page 7: G2.3

*Rats and mice are social animals, and their wellbeing is greatly increased if they can be housed with other compatible rats and mice, **of the same sex and for males, from the same litter. Combining adults who have not been raised together can create stress, fighting and result in severe injury or death. Males not raised together from weaning are highly likely to fight and cause serious injuries.** Sufficient hiding placed within enclosures are important at mice can be shy, hiding placed provide safety and comfort.*

Misleading.

Rats: While it is true males can fight, it is NOT 'highly likely' that 'same litter males' will fight 'to cause serious injury'. This is fear mongering. Desexed males will have a short period of adjusting to other males, which can be overcome by introducing them slowly in a neutral territory.

Mice: You cannot safely keep intact (unneutered) male mice from different litters together, as it is highly likely to result in serious aggression and fighting, Intact male mice are territorial, and attempts to house them together often fail, even with littermates. The most successful housing for male mice is a single-sex group of neutered littermates or a neutered male housed with females.

Page 7: G2.5

Rodents should be housed in outdoor hutches or enclosures or live indoors in an enclosure or cage specifically designed for rats or mice where they can be trained to use a litter tray. Litter trays should be lined with wood or paper-based litter or hay or straw; other types can be harmful if ingested by rodents.

Enclosures - Incorrect.

Rodents are best kept (should be kept) in INDOOR enclosures that are appropriate to the species. It is no longer recommended to keep rats and mice in outdoor hutches. The statement is suitable for guinea pigs and ferrets – but even then ‘SHOULD BE’ is incorrect. Guinea Pigs and ferrets ‘can be’ kept in outdoor hutches.

You cannot keep a **pet mouse** in an outdoor cage because they are vulnerable to predators, temperature extremes, and diseases from wild rodents. Mice need a stable, indoor environment with a constant temperature between approximately 18-24°C, away from direct sunlight, drafts, and loud noises. An ideal indoor enclosure is well-ventilated, escape-proof, and spacious enough for activity and enrichment.

Pet rats should not be housed in outdoor cages for extended periods or as their primary residence because they are sensitive to extreme temperatures (too hot or too cold), direct sunlight, drafts, and outdoor predators and pests. The ideal temperature for rats is around 19-23°C, and placing their enclosure outside exposes them to potentially fatal conditions and hazards like diseases and pests.

Litter trays – incorrect

Mice: While it is possible to train mice to use a litter tray, they generally do not learn to use them. If trying a litter tray then paper-based pellets, shredded paper, or recycled newspaper cat litter, are recommended as these are absorbent and less dusty than other options. Avoid wood shavings (especially pine and cedar), dust-producing clay litters, cotton wool, and heavily scented products, as they can cause respiratory problems or health issues for mice.

Rats: Rats can be toilet trained to a significant degree, though achieving perfect "house training" for urination is difficult due to their natural scent-marking behavior. Placing a suitable litter tray in their preferred corner and putting their droppings inside to reinforce the desired location and a ‘pee rock’ in the tray also encourages them to urinate in that spot.

A rat's litter tray should use a dust-free, highly absorbent, and unscented pelleted litter like recycled paper, aspen pellets, or straw pellets, ensuring it's different from the cage bedding to help the rat distinguish the toilet area. Avoid clumping cat litter, cedar, and clay litters, as they can be harmful to a rat's respiratory or digestive systems.

Straw and hay is not recommended for use especially in litter trays as its ability to release moisture can be limited, potentially leading to higher moisture retention and increased pathogen growth (fungal and mould) and subsequently is found to lead to respiratory and skin health issues and eye irritations.

Page 7: G2.8

*Enclosure or cage bases should be lined with absorbent and low dust substrate (minimum 3-4cm layer) such as wood, dried corn cob (specifically designed for bedding material) or compressed paper-based litter. **Rats can also be housed on soft hay.***

Incorrect. Hay (even soft hay) is not recommended for use as its ability to release moisture can be limited, potentially leading to higher moisture retention and increased pathogen growth (fungal and mould) and subsequently is found to lead to respiratory and skin health issues and eye irritations.

Page 9: G3.1

Rodents should be introduced gradually to accessories such as harnesses, transport cages or exercise balls or harnesses for rats. They should also be socialised with other rodents of the same litter (see environment and housing) and humans when it is safe to do so.

Misleading.

While you can buy harnesses for some rodents, it is not recommended for pet mice due to their fragile bones and delicate skeletal structure, which can be easily damaged by a harness. You can use a harness on a pet rat.

Socialisation should read: 'of the same species'. Of the same litter is incorrect – they do not have to be of the same litter to be housed together.

Page 10: Hygiene

Hygiene is important for the health of your rodent and you as the keeper/carer. Rodents can harbour disease that can be passed onto humans and other animals, so it is important to maintain high levels of hygiene to minimise the risk of disease.

Alarming.

While Animal Care Australia acknowledges there are diseases such as Rat Bite Fever, Leptospirosis, and Hantavirus (not in domestic mice) that can occur – the level of occurrence in pet rats and mice in Australia is extremely low.

Rather than having that statement in the introduction, a more appropriate lead would be:

“Hygiene is important for the health of your rodent and you as the keeper/carer. It is important to maintain good hygiene when handling and after handling your rodents and throughout the cleaning of their enclosures. This will help keep your pets healthy.”

In our opinion it is unnecessary to create a fear of or stigma against pet rats and mice when a calmer statement is just as effective.

Page 10: G4.5

Cleaning and disinfecting agents should be chosen on the basis of their suitability, safety and effectiveness. Bleach or chlorine-based disinfectants are effective against common rodent pathogens.

Incorrect. You should not clean your pet rat or mice enclosure with bleach due to the health risks. A safer, more recommended approach involves using pet-safe cleaners, or a solution of equal parts white vinegar and water or simply soap and water followed by a good rinse and air-dry.

Page 10: G4.8

Litter trays should be kept separate from food and sleeping areas and should be cleaned using separate cleaning equipment.

This is difficult to achieve in a standard rat or mouse enclosure. Again, a more suitable statement would be:

“Where possible, keep litter trays as far away from food and sleeping areas ...

Remembering this actually only applies to the ‘random’ rat that has been successfully trained. Typically, multiple animals in the same enclosure will ‘go where they want to’.

There is FAR too much emphasis on litter trays in this Code for species' that are highly unlikely to be using them.

Page 14: G6.2

*Healthy, short-haired rodents do not require grooming given this is an important behaviour of the rodent. **However, some fancy breeds with longer hair are likely to require regular grooming.** Lack of grooming or overgrooming may be a sign of moderate arousal or high stress states.*

Incorrect.

Rats: You do not need to groom the fur of a long-haired rat, as they are naturally very clean and groom themselves extensively. However, you should monitor your rat for signs of barbering (excessive grooming resulting in hair loss), matting in their long fur, or general dirtiness. If you notice these issues, you may need to intervene with gentle brushing for matts, or a warm water sponge bath for dirt.

Regular grooming of a long-haired pet rat involves trimming its nails, not brushing its fur. This point needs to be clearer as the above Guideline implies the fur is the issue. Regular fur grooming can stress or make a rat sick, particularly if it involves forced washing.

Mice: You don't need to actively groom your long-haired mouse because mice are naturally clean and groom themselves. However, if your mouse is elderly, physically unable to groom, or has gotten unusually dirty, you can assist with a gentle sponge bath using only warm water or a very mild, unscented wipe.

Regularly grooming your mouse's fur by washing or applying foreign scents will cause stress and illness because it removes their natural scent, disrupts their self-grooming, can lead to aggression from other mice, and introduces potentially harmful chemicals. Mice are naturally clean and rely on self-grooming, so manual grooming should only be done, if necessary, such as to trim nails, and always with extreme care.

Page 16 – Microchipping

Animal Care Australia questions the efficacy of this entire section given mice should not be microchipped and while rats can be microchipped most owners believe the benefit is outweighed by the cost. Additionally, considering the fact there is only one National Microchip database that has the appropriate fields available to list a rat – it is extremely unlikely that pet owners would go to that extreme. The note in the Code even suggests it is only a consideration for rats:

“ Note: It is unusual to microchip a mouse due to the size of the microchip however it is possible for rats, usually under anaesthesia by a veterinarian.”

Most owners would also consider the risks of their rat being placed under anaesthesia to be simply not worth it.

Page 17: Breeding

“Animal shelters and rescue groups are placed under immense pressure to find homes for the large number of unwanted rodents in the ACT. Serious and careful consideration should be undertaken before allowing rodents to breed. Breeding rodents can produce a litter of 4-25 pups every 21 days. ”

This is an alarmist statement. Species specific data is not reported from animal rescues and the RSPCA bundles all rodent species into one category of ‘Other or small pets’.

Animal Care Australia could find data from national sources:

Pet rescue¹⁷ source indicated nationally in 2021-2022, pet rats and mice constituted only 0.3% of all "other pets"

RSPCA Aust¹⁸ data for the ACT indicates only 333 ‘Other Animals’ made their way through their services in the reporting period 2023-2024. 333 of a total of 3367 animals. Nationally, ‘Other animals’ was listed to include Budgerigars, Doves, Ferrets, Guinea pigs, Mice, Pigeons, Rabbits, Rats, Tame ducks and chickens.

An overall total of 9.9% nationally. Shared between 9 separate species.

Also given the average litter size for mice is: 5-12 (commonly 6-8) and for rats it is 6-12 (commonly 8-10) where on **earth did 4-25 come from?**

Alarmists statements are typical of animal rights ideology attempting to push for a strong response – more often than not ill-founded and unnecessary.

Animal Care Australia strongly recommends the statement for breeding should simply state:

“As a responsible pet owner, serious and careful consideration should be undertaken before allowing rodents to breed. Breeding rats or mice can produce a litter of 5-12 young every 21 days.”

Page 17: S9.3

A person responsible for a rodent must not allow the rodent to mate with his sibling or parent.

This is incorrect. Appropriate wording is ‘should not.’

While it is strongly recommended not to breed with a parent or sibling, it is required for ‘linebreeding.’ The goal is to reinforce and maintain specific desirable traits, such as coat colour or temperament, within a family or lineage or for breeding in order to breed out undesirable recessive traits, like genetic defects and reduced fertility. Careful record-keeping and periodic introduction of unrelated bloodlines are also essential to preserve genetic diversity and overall health.

Therefore, this should be a Guideline and not a mandatory standard – or as with other species have the addition of: ‘be carried out under veterinary supervision.’

Page 19: G9.13

A person should only permanently remove a pup from its mother if the pup has reached three weeks of age. This might not apply if the person has veterinary advice recommending the pup be removed before the pup has reached three weeks of age.

Incorrect. Not recommended by responsible breeders.

¹⁷ [Pet Rescue data](#)

¹⁸ [RSPCA Aust statistics](#)

You should separate male rat pups from the mother and female pups around 4.5 to 5 weeks old to prevent accidental pregnancies, as they can become sexually mature by then. Leave the female pups with the mother for several more weeks, with the entire litter ideally separated for rehoming or permanent housing between 6 to 8 weeks of age.

You should remove baby mice from their mother when they are 3 to 4 weeks old. This is when they are fully weaned and able to eat solid food on their own.

This should read:

“A person should only permanently remove a kit/pup that is under 3 weeks of age from their mother under veterinary advice. Pup/kits should be removed once fully weaned and eating solid foods.”

Page 19: G9.15

*Pups are best raised where they have extensive contact with their carer to ensure they will be well conditioned as pets. Pups should be trained to accept handling, **and long-haired varieties should be introduced to grooming from a young age.***

Incorrect. Long-hair breeds SHOULD NOT be groomed unless medically necessary.

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If a person responsible for a pet rat or mouse chooses (in accordance with Standard 10.1) to have the rat or mouse euthanised, the rat or mouse may only be euthanised by a registered veterinarian.

Impractical and not always in the best interest of the animals when a vet is unobtainable, unavailable or unaffordable.

Also, it is not easily enforceable unless directly witnessed in a manner that is cruel/an act of animal cruelty.

A quick Google search indicates the following:

“In the ACT, the cost for euthanizing a pet rat will vary by vet and can range from approximately \$200 to over \$500, not including any potential after-care costs like cremation or burial. Mobile veterinary services offer peaceful euthanasia at a starting price of around \$399, though this can increase with evening, after-hours, weekend, or public holiday appointments. It is essential to contact local ACT veterinary clinics directly for a precise quote, as rates depend on factors like the vet's pricing, whether it's an emergency or after-hours service, and if after-care is included.”

It would be better for this to be a **Guideline** and read:

“Where practical, if a person responsible for a pet rat or mouse chooses (in accordance with Standard 10.1) to have the rat or mouse euthanised, the rat or mouse should be euthanised by a registered veterinarian”