

24<sup>th</sup> October 2025

The Hon. Steve Dimopoulos  
Minister for Environment  
Minister for Tourism, Sport, and Major Events  
Minister for Outdoor Recreation  
Email: steve.dimopoulos@parliament.vic.gov.au

### **Victorian Government response to the Wildlife Act Review**

Dear Minister,

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation.

Animal Care Australia has contributed to the ongoing consultations of the Wildlife Act 1975 and is concerned with elements of the government’s response to the Review and Panel Report.

As the peak animal welfare organisation that represents people who keep native animals as pets, Animal Care Australia has particular concern with the following recommendations:

- 1) The Victorian Government commits to the development of a Bill to amend the Act, and the preparation of regulations to amend the Wildlife Regulations 2024. In particular, the Victorian Government commits to reforming wildlife licensing to improve wildlife welfare and community safety.**

Animal Care Australia has previously consulted on reviews of the Act and Regulations (2024) and strongly requests the government ensures any new Bill or changes to the Regulations are fully consulted with the stakeholders that will be most affected by the changes.

Animal Care Australia notes the government will continue to adopt the risk-based approach to licensing and the welfare needs of wildlife, and we support this decision.

- 2) Fit and proper person test: A fit and proper person test is a legal requirement used to assess whether someone is suitable for a specific role or to engage in a regulated activity. The Victorian Government will make sure that individuals who want to own, breed, control, display or care for wildlife must first demonstrate that they are law-abiding and possess the necessary skills and integrity to do so responsibly. The Victorian Government supports expanding the application of the fit and proper person test for anyone seeking to hold a wildlife licence or authorisation.**

While on the surface this appears to be a measure that should be supported, the introduction of fit & proper persons requirements within dog-keeping communities has proven to be problematic. Of greater concern for Animal Care Australia is the restriction the current Victorian Fit & Proper Person testing will place on an individual proving their knowledge and skills or ability to own an animal. Many ‘basic’ wildlife license applicants will be obtaining their animal for the first time and therefore

will have limited skills and knowledge. It is our fear that the potential rejection of ‘new licensees; that this would therefore create is a long-winded ‘grandfathering method’ of phasing out wildlife license holders. If ‘new applicants’ are incapable of applying for a license, they simply will stop keeping native pets OR, will more likely turn to illegally keeping them. Animal Care Australia hopes that this is not what the governments is ‘supporting’?

**3) The Victorian Government supports the introduction of codes for standards of care for wildlife in captivity in all instances and supports the Conservation Regulator having the power to make such codes.**

Animal Care Australia also supports Codes of Practice that outline Standards and Guidelines for the keeping of animals, including native animals being kept as pets. However, past experiences with the development of existing Codes in Victoria, particularly for those keeping reptiles has proven that not only does the Conservation Regulator have little understanding of the actual husbandry needs of the animals - the key stakeholders – those who actually keep these animals have been ignored.

This MUST NOT continue and all Codes MUST be developed with the inclusion of the animal keeping stakeholders.

**4) Create a new class of licence for the private keeping of dangerous wildlife as pets. A new dangerous wildlife licence category will ensure there are strict safety and welfare controls when dangerous animals are allowed to be kept as pets under a private wildlife licence.**

Animal Care Australia does not support this. The species outlined (venomous snakes and large monitor lizards, and we assume those with continuing crocodiles) are already held under Advanced Licenses. Presumably, given the Fit & Proper Persons Test will also be introduced proving they have the skills & knowledge then what is the purpose of this – other than to pander to the animal rights and anti-native animals as pet’s activists?

**5) Prohibit the keeping of crocodiles as pets. Crocodiles are not appropriate as pets, and they do not belong in our towns and suburbs. The keeping of crocodiles as pets under a private wildlife licence will no longer be allowed, except for those already held under a current wildlife licence.**

Animal Care Australia does not support this move. What information or data is being used to make this determination given crocodiles have been permitted for a long period of time? Animal Care Australia acknowledges there is a difference in the husbandry requirements and growing size between saltwater and freshwater crocodiles, however, what has changed in the animal welfare needs of a crocodile that prompts such an extremist response? Again, what is the purpose of this – other than to pander to the animal rights and anti-native animals as pet’s activists?

**6) Stop intensive and cruel wildlife breeding. The Victorian Government is proud to have banned puppy farm operations. The current wildlife licensing rules allow unlimited breeding of wildlife under private and commercial licences, and that has to change. Intensive breeding can be cruel. Large-scale breeding in residential areas is not appropriate. Sensible new limits will be established and tailored to the purposes of each licence category.**

This is NOT SUPPORTED by Animal Care Australia. Contrary to the ramblings of the Animal Justice Party and Oscars Law, the government’s puppy farm legislation has NOT reduced the number of poorly bred puppies and kittens. It has increased them. Ther legislation took what was a monitored above-ground breeding industry and turned it into an extremely costly under-ground cesspool of poor breeding and irresponsibly maintained animals. The government’s own statistics on the numbers of dogs and cats making their way into shelters and rescues and the massive increase in funding and grants to the shelter industry is testament to the outcome of implementing number restrictions on animal keeping. Equally Local Councils with animal number restrictions continually report a decline in animal registrations and have a high level of non-compliance for other animals

being kept. Sadly, these only come to their attention when animal welfare standards are so bad they are reported by neighbours. This IS NOT how Animal Care Australia wants to see the keeping of native animals managed by any government.

Animal Care Australia questions the language used in the response from government: “Intensive breeding **can be** cruel,” can be? Is that because even the government recognises that it is not a common outcome? “**Sensible new limits**”- sensible to who, the animal rights activists that the government is pandering to with the implementation of this change?

More importantly there is no validity in imposing number restrictions for the claimed purpose of improving animal welfare. If the stated Codes of Practice are consulted on and implemented these will go far further in improving welfare outcomes.

Animal Care Australia also draws your attention to the complications and implications of combining the introduction of a new ‘dangerous animals’ permit and ‘commercial licensees’. Currently, there are a number of ‘private license holders’ who own a significant number of reptiles – which includes species held on basic and advanced licenses.

Currently the Department is claiming those with larger collections ‘must be commercial entities’ and insisting they move to a commercial license. This is not correct. They are simply private keepers with broad species collections. The animals are not sold via a commercially registered business and by Australian Taxation standards are not commercial entities until they pass a list of thresholds. The department should not and MUST NOT be able to dictate against a nationally recognised standard – regardless of their personal and often extremist opinions.

Taking this into account, if, as proposed, a venomous snake is moved to a ‘dangerous’ license and number restrictions on private licensees require those with larger collections to hold different license categories – it is extremely likely anyone with larger collections will be deemed a commercial entity. This raises a major concern as commercial licenses do not permit the keeping of venomous reptiles.

The appropriate measures MUST be implemented to:

- a) Provide for larger collections to still be deemed ‘private’ and not ‘commercial’,
- b) Any declaration of a ‘dangerous’ species must be reviewed and evaluated by science and not bias or extremist ideology
- c) Granted of multiple license categories must be permitted to ensure holders wishing to maintain or expand their collections can do so responsibly and legally.

Given the level of impact these changes will have on all of those who keep native wildlife as pets Animal Care Australia is requesting a meeting with the Minister in order to further discuss our concerns and with the hope of working with the government and the department moving forward.

Kind regards,



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

## **About Animal Care Australia**

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights