

21st October 2025

Chief Executive Officer
Swan Hill Rural City Council,
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Domestic Animal Management Plan 2026-2029

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

Animal Care Australia is currently recognised by Animal Welfare Victoria as a key stakeholder in the review of Victoria’s Animal Welfare Act and its associated regulations. Animal Care Australia is directly consulting and advising during that review, including the future revision of Codes of Practice for the keeping of all pets.

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

Animal Care Australia is engaged with state governments to develop more appropriate model Local Laws and model Subordinate Local Laws governing the keeping of animals in each state. Nationally, Animal Care Australia is finding Local Councils placing restrictions and permit requirements on their residents which do nothing to improve animal welfare and tend to lead to greater non-compliance.

Key Commendations and Great Initiatives

- Expansion of low-cost desexing and accessibility programs for vulnerable pet owners, reflecting a humane and inclusive policy direction.
- The two-stage community consultation process with measurable data.
- Identifying resident concerns/needs, and commitment to actioning them.
- Strengthened Authorised Officer training program ensuring consistent, professional enforcement.
- Continued emphasis on proactive education campaigns using digital, radio, and print media.
- Council website is easy to navigate and pet ownership information is available in multiple languages.
- Integration of annual public reporting obligations, increasing transparency and accountability.
- Plans to look at reducing release fees, and payment plans for vulnerable owners.
- Free microchipping program – and expansion of same.
- “Free Ride Home” program.
- Council’s current registration fees are pretty low compared to some exorbitant fees charged by other Victorian councils and Council’s commitment to look into lowering fees even further.
- Ongoing collaboration with over 70 rehoming organisations under section 84Y agreements.

- The use of data-driven decision-making, including benchmarking and percentage-based targets, represents modern governance best practice.

Animal Care Australia acknowledges Swan Hill Rural City Council's strong commitment to responsible pet ownership, welfare, and community safety through the Draft DAMP 2026–2029. The proposed plan demonstrates progressive governance and a collaborative approach to animal management.

Opportunities for Further Improvement

1. Continue expanding partnerships with local veterinarians to ensure sustainable delivery of low-cost desexing initiatives.
2. Explore introducing education modules targeting children and youth to build early responsible pet ownership values.
3. Consider inclusion of post-incident support and education following dog attacks to assist victims and owners.
4. Ensure equitable access to enforcement and education programs across rural localities such as Robinvale and Ultima.
5. Maintain transparency in performance metrics by publishing annual progress reports on DAMP targets via Council's website.
6. Provide clearer public reporting on enforcement statistics, including dog attacks and nuisance resolution outcomes.

General feedback:

Community engagement:

Animal Care Australia notes the small engagement response to the survey (only 157 contributions). This means insufficient promotion of the review was conducted.

Training for authorised officers:

Animal Care Australia notes there are 5 full-time multi-disciplined officers with no designated Animal Management Officer.

Responsible pet ownership programs:

Animal Care Australia's review of Council's website found it is easy to navigate, has relevant information, and available in multiple languages. Animal Care Australia strongly commends this, as a vast number of other Council websites are difficult to navigate.

While the Action plan looks quite comprehensive, it would be good to include partnerships with local community groups/businesses to help with promotions.

Overpopulation and high euthanasia rates:

Animal Care Australia highlights reclaim rates for impounded animals may be impacted by the costs to reclaim. Animal Care Australia commend Council on plans to look at reducing release fees, and payment plans for vulnerable owners, and the low-cost desexing program for cats. Animal Care Australia is unsure from this DAMP whether this would include and dogs? If not – it should.

Registration and identification:

While Animal Care Australia generally supports the animal numbers outlined in Community Local Law No. 2 – Part 7 Animals, we strongly suggest utilising the number caps on pets as a guideline to be enforced only when an issue arises where an owner needs to be restricted for animal welfare reasons, rather than a hard rule, and to scrap the excess animals permit system or make the permit

free for all residents other than repeat offenders. Residents who have more than the specified number of pets may be more likely to register if the caps/permits/fees are removed.

Please note: Animal Care Australia DOES NOT SUPPORT the limit of just two rabbits on residential premises. See our Closing Statement for more.

Nuisance:

Animal Care Australia supports Council's 24-hour cat containment rule provided Council assists residents with measures to ensure cat containment to their property is affordable and Council continues to maintain the information pages on its website. These pages are very comprehensive and well-informed.

Animal Care Australia notes there is only 1 designated dog off-leash area in the LGA – to service at least 2292 registered dogs. Animal Care Australia strongly suggests the creation of more designated off-leash areas.

Emergency management:

Animal Care Australia notes the planned activities in this area all have a 2028 planned date and we suggest this could be prioritised to be completed and actioned sooner than 2028.

For a comparison of the current DAMP versus the Draft DAMP see appendix 1.

In closing:

It is necessary to call your attention to rabbit number restrictions within the **Community Local Law No. 2 – Part 7 Animals** - in the hope that while Council is reviewing the Domestic Animal Management Plan you will consider approving amendments to Local Laws taking into consideration our feedback and provide the opportunity for residents to keep their pets without the need for permits.

Small Mammals:

Rabbits, ferrets, guinea pigs, rats, and mice are considered as house pets and have been for some time now.

Now that housing cost forces people into smaller unit dwellings, indoor pets such as rabbits, ferrets, rats, mice, and guinea pigs are becoming the norm.

Owners of these smaller pet's work to improve the quality of the animal in health and temperament and animal related clubs and societies have policies for registered breeders who are bound by their published Code Of Ethics and Code Of Practice along with provisions provided with the current Prevention of Cruelty to Animals Act.

There are many Societies for rabbits, guinea pigs, rats, and mice.

Rabbits

Many people that keep rabbits in any residential situation keep them as pets and the majority of pet rabbits are kept as indoor pets for their health and safety. Vaccines do not provide protection against all of the government released rabbit haemorrhagic viruses that are designed to eradicate feral rabbits.

Responsible pet owners will have their rabbits desexed should THEY NOT wish to breed. Council imposing restrictions is an extreme overreach of power and highlights how out of touch with animal keeping this draft policy is.

Small mammals are extremely popular, particularly in circumstances of higher residential density areas, make no noise, and despite common misconception produce little to no odour. Small mammals are colony animals, and a limit of just ten animals is simply poor animal welfare. This is especially applicable if different species are kept as, it further limits the ability of the pet owner to keep suitable colonies of each species if limited to a total number of four or just two!

Animal Care Australia would like to request a meeting to discuss further collaboration to ensure a policy that aligns with the needs of your pet keeping residents.

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

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

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, looping 'M' and a long, sweeping tail on the 'y'.

Michael Donnelly

President

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Appendix 1: Side-by-Side Comparison and Commentary

Section	2022–2025 DAMP	2026–2029 Draft DAMP (with Commentary)
Overall Structure & Focus	34 pages, detailed procedural focus. Annual review required.	32 pages, more strategic and outcomes based. Aligns strongly with Section 68A of the Domestic Animals Act 1994. ACA commends this shift to performance accountability and statutory clarity.
Community Consultation	Single consultation period in 2021 with 196 responses.	Two consultation rounds (mid-and-late-late-2025) including multilingual options. Demonstrates a best-practice approach to community engagement. ACA applauds the inclusion of measurable survey data and broader inclusiveness.
Training for Authorised Officers	Outlined need for Cert IV qualifications; several officers undertaking training.	All officers now qualified with Cert IV Animal Control and Government (Statutory Compliance). Adds workplace behaviour and firearms safety. Strong demonstration of professional capability and compliance alignment.
Responsible Pet Ownership	Focused on cat confinement, desexing and on-leash promotion.	Expanded with multilingual and easy-English materials, signage checks, and twice-yearly campaigns. ACA supports this as an excellent public education initiative promoting proactive compliance.
Overpopulation & Euthanasia	58 rescue partners; low-cost desexing introduced; aim to reduce euthanasia 5%.	72 rescue partners; low-cost desexing expansion; research into mobile vet programs; inclusion of vulnerable person payment plans. ACA strongly commends the welfare-first and accessibility-based approach.

Registration & Identification	Free Ride Home initiative introduced; annual database contact; half-price reg.	Continues Free Ride Home; biannual microchip data matching; expanded free microchipping; new fee-reduction study. A clear example of data-led innovation and community incentive.
Nuisance & Dog Attacks	Basic enforcement and education campaigns.	Enhanced communication: twice-yearly radio and print campaigns; better signage. Commendable reinforcement of public education for safety and compliance.
Domestic Animal Businesses	Standard inspection and audit framework.	Improved cross-referencing with the Animal Management Procedure Manual and expanded auditing structure. Reflects sound governance and transparency.
Other & Annual Review	Annual review mentioned briefly.	Explicit annual review and reporting to be published in Council's Annual Report as per s68A(3)(c). Strengthens accountability and public transparency.
Local Laws & Orders	Community Local Law No. 2 – Part 7 Animals	Out of touch with animal welfare requirements for rabbits and with current community expectation

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