

9th November 2025

KG:MD

NDIS Evidence Advisory Committee
Department of Health, Disability and Ageing
Email: disabilityevidence@health.gov.au

NDIS Evidence Advisory Committee Consultation September 2025

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.

Benefits of the Proposed Recommendations

Clarity and Consistency

The current system is fragmented, with different state and territory laws and inconsistent NDIA decision-making. The proposed framework will:

- Establish clear national definitions for what constitutes an “assistance animal”.
- Provide a transparent and replicable assessment process, ensuring participants and planners can make decisions based on evidence rather than interpretation.
- Reduce appeals and disputes between participants and the NDIA, improving efficiency and trust in the system.

Improved Participant Outcomes

Assistance animals that meet minimum training and accreditation standards deliver tangible functional outcomes—improved independence, safety, and social participation.

By ensuring that only task-trained, behaviourally stable, and healthy dogs are funded, the NDIS can demonstrate measurable participant benefit, aligned to its legislated purpose.

Value for Money and Accountability

Linking funding eligibility to accreditation and performance evidence ensures that public funds are spent on animals that meet the required standards and have been proven to deliver disability-related outcomes.

This discourages under-trained or welfare-compromised programs that do not provide long-term benefit.

Protection of Animal Welfare

The inclusion of welfare oversight within the proposed standards ensures dogs are:

- Selected for suitable temperament and health,
- Not overworked or placed in unsuitable environments,
- Supported throughout their working life and retirement.

This balance between participant outcomes and animal welfare is essential to the sustainability of the assistance-animal sector.

Alignment with National Principles

The recommendations align with the Department of Social Services' (DSS) National Principles for Assistance Animals (2025), promoting a unified approach that removes state-by-state inconsistencies and enhances portability for participants travelling interstate.

Minimum Training Requirements for Assistance Animals

While the EAC consultation materials avoid prescribing exact training hours, Animal Care Australia recommends adopting a **national minimum benchmark** drawn from established Australian and international models (e.g., Assistance Dogs International and Guide, Hearing and Assistance Dogs legislation).

An assistance animal should:

1. Be specifically task-trained to mitigate a person's disability (e.g., guiding, alerting, retrieving, providing stability, or interrupting anxiety behaviours).
2. Demonstrate public safety and control, verified through a recognised Public Access Test (PAT) or equivalent national standard.
3. Exhibit sound temperament and welfare fitness confirmed by a veterinary health check and behavioural assessment.
4. Be raised and trained under documented supervision, with a record of its training, task proficiency, and public-behaviour assessments.
5. Be re-evaluated periodically to ensure continued suitability for public work and handler control.

These criteria ensure both the functional reliability of the assistance animal and the safety and welfare of the broader community.

Minimum Requirements for Trainers and Training Organisations

Animal Care Australia supports the EAC's recommendation that NDIS-funded assistance animals must be trained by qualified and accredited organisations or individuals.

The minimum standard should include:

1. Accreditation or registration under:
 - State or territory assistance-animal legislation, or
 - A recognised national accreditation system endorsed by the Commonwealth, or
 - International accreditation such as Assistance Dogs International (ADI) or Guide, Hearing and Assistance Dogs (GHAD) programs.
2. Demonstrated competency in disability-specific training—beyond general obedience—linked to measurable participant outcomes.
3. Capacity to conduct and document Public Access Tests, with transparency of records.
4. Formal education or experience in canine behaviour, learning theory, welfare, and training techniques aligned to the national animal-care qualifications framework (e.g., ACM40322 Certificate IV in Animal Behaviour & Training or higher).
5. Commitment to ongoing animal welfare monitoring and post-placement support for participants.

This ensures that only credible, evidence-based training providers are funded and reduces instances of inconsistent or unsafe assistance-animal outcomes.

Conclusion and Recommendations

Animal Care Australia commends the NDIS Evidence Advisory Committee for progressing this consultation and strongly supports:

- Adoption of a nationally consistent framework for recognising assistance animals and trainers;
- Implementation of a single Public Access Test (PAT) benchmark across Australia;
- Recognition of accredited organisations (ADI, GHAD, or equivalent) for NDIS funding eligibility; and
- Inclusion of ongoing welfare oversight to protect both the participant and the animal.

These measures will enhance participant safety, streamline decision-making for the NDIA, and uphold the welfare and professionalism of the assistance-animal sector.

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

Kind regards,



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About Animal Care Australia

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

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

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

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

Animal Care Australia provides priority to the following:

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