

18th November 2025

Glenelg Shire Council
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Local Laws Manager

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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.

Animal Care Australia **DOES NOT SUPPORT** the sole use of surveys/feedback forms as a means of consultation. It is inappropriate for Council to claim you have consulted when organisations are not actually able to lodge a written submission. Surveys are misleading and provide for irresponsible statistical analysis.

It is vital that Councils support the keeping of all pets within their shires/municipalities and that Councils consult with the appropriate stakeholders when looking to address the many myths or phobias that are expressed by uneducated members of the public, in relation to the keeping of some animals.

Some notable statistics:

- Population = 20379 (est. 10172 households)
- Registered dogs = 4087 (est. 13224)
- Registered cats = 1349 (est. 16275)
- Current cat curfew 7pm to 7am
- Council run temporary impound facility – 72 hours hold then transferred to Warrnambool facility
- Active Facebook page for local impound facility with regular photo updates of impounded pets

Key Commendations and Great Initiatives:

Animal Care Australia commends Council on:

- ✓ All areas in the Shire are designated off leash, except designated Dog Control Zones
- ✓ Relatively low registration fees. **NB:** room to decrease further to encourage uptake
- ✓ Dedicated and active Animal Welfare Centre Facebook page – regularly updated with photos of lost pets
- ✓ Council website allows for translation into several languages other than English
- ✓ Commitment to placing educational posters and flyers in local businesses and community spaces promoting responsible pet ownership and running free pet care talks in schools and local community events. Animal Care Australia strongly supports these initiatives.
- ✓ Enhanced patrols by Local Laws officers. **NB:** It is important that focus should be on education before prosecution.
- ✓ Returning strays directly to owners whenever possible – many other councils have a “First ride home free” program where registered strays are returned free the first time they are picked up.

Recommendations for Strengthening Opportunities and further Improvement:

- Council website does not make it easy to find animal related pages. Animal Care Australia’s attempts to find information resulted in having to go to Menu -> Our Services -> Local Laws -> Animals and then the information contained there is general in nature and does not specify fees or the like for registrations, infringements, or impound release fees.

Additionally, while within the Animals section there is no mention of the need for an Excess animal Permit or a link to the Local Law 2018 for the Keeping of Animals. Most people are unaware there are extra restrictions if you do not highlight these. **NB: Animal Care Australia does not support these number restrictions. See below for more information.**

- Animal Care Australia notes the Council run impound facility is only open by appointment and only holds lost animals for 72 hours before sending them to Warrnambool, some 97km from Portland. Reclaiming a pet from Warrnambool would be difficult for anyone located at the further reaches of the Glenelg Shire. Greater consideration must be given to providing an additional closer facility or extending the length of time pets remain in the impound facility.
- Council’s impound release fees (as per Fees and Charges Schedule 2025-2026) are quite high. Why is an additional “sustenance fee” of 7.60/day charged on top of the 50.30/100.60 daily impound fees? One assumes that infringement fines would be added on top of the release fees, as well as registration and/or microchipping fees? This is extremely costly for any pet owner and would be a deterrent to anyone reclaiming their impounded pets.

Council should look into reducing the fees overall, and possibly also introducing payment plans for financially disadvantaged pet owners.

- 7pm to 7am cat curfew is hard to enforce. Animal Care Australia supports 24-hour containment to the owner’s property, as long as this is introduced with a transition period and assistance for residents to set up containment measures and get cats used to being contained.
- This DAMP notes that consultation was conducted as a part of the consultation for the Council and Wellbeing Plan and yet not one of the “what we learned” items mention anything specifically related to animals. Why is this?
- “Actions will be funded within existing budgets,” simply equates to anything extra will be dependent upon securing external funding, and yet there is no mention of the existing budgets.

How is anyone supposed to accurately track Councils actions and reasons for inaction with missing information?

- The DAMP raises a number of animal management related questions, including:
 - Does council have dedicated animal management officers, or are they multi-tasked across all Local Laws officers?
 - How many Local Laws officers does council have, and are they full-time or part-time?
 - What are their specific animal-related qualifications, and what other qualifications is Council going to make sure they have – e.g. Cert IV in Government (Investigations and/or Animal Management)?
 - The learning/training plan is very vague and has no measurable outcomes listed – why not?
- Low pet registration uptake. While Council does have relatively low registration fees, there is room for lowering fees overall to encourage pet owner uptake. Removal of MANDATORY excess animal permits and pet number caps is a great starting point. Excess Animal Permits SHOULD ONLY be used when required to enforce compliance after an amenity issue has been identified – and not mandated on all residents. This is simple income raising and in the case of reptiles, it is species bias as these owners already pay permit fees to the state government for the ability to keep their reptiles. Council’s additional fees are penalising residents unnecessarily. A major factor stopping owners registering their pets may be that they have more than the mandated numbers and cannot afford annual excess animal permits as well as registration fees. Animal welfare is NOT about how many animals are kept, but how they are kept.

Mandatory desexing of cats in order to register a cat is not recommended by Animal Care Australia. This is THE number one reason most cat owners who have unregistered do so. In most cases they cannot afford the cost of desexing. It does not require research to identify barriers to desexing – the simple answer is cost. Subsidised desexing programs DO work. Council should look into the successful RSPCA NSW “Keeping Cats Safe at Home program”¹

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- Community cats need to be managed humanely, any trapped stray cats that are amenable to human interaction or able to be rehabilitated to same should be offered to rescue groups under an 84Y agreement or offered for rehoming from the pound(s). Council should already have 84Y agreements in place to facilitate adoptions of unclaimed pets.

Unfortunately, this DAMP does not really come up to scratch regarding implementing new and measurable outcomes.

Animal Care Australia strongly suggests Glenelg Council look at the recently drafted DAMP from Melton City Council for comparison - https://hdp-au-prod-app-melt-conversations-files.s3.ap-southeast-2.amazonaws.com/9317/6118/9890/MEL5806_DAMPlan_v2A.pdf

In closing:

It is necessary to call your attention to General Local Law 2018² - Part 3 Keeping of 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.

¹ [RSPCA NSW – Keeping Cats Safe At Home program](#)

² [Local Law 2018](#)

Animal Care Australia does not support the number restrictions on guinea pigs, domestic rabbits, rodents, reptiles, and small birds.

Animal Care Australia also notes 3.04 defines the age of progeny of animals but is restricted solely to dogs and cats. The species restricted as mentioned above all have solid numbers of progeny at any given birth or hatching, which raises the question as to how anyone could meet these requirements WITHOUT the requirement of an Excess Animal Permit – again – revenue raising and not animal welfare orientated.

The limiting of a total of only 6 ‘rodents’ raises concerns. Rats, mice, ferrets, and guinea pigs ARE ALL rodents. Therefore, does Council include the 2 guinea pigs listed in the table separately or collectively?

A limit of only 6 ‘rodents’- we assume refers to rats/mice, 30 small birds, and the limit of only 6 reptiles is **NOT SUPPORTED by Animal Care Australia** as this contradicts the animal welfare needs of the individual species – in particular rodents where there are multiple species of rodents kept as pets.

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, 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 Animal Welfare Acts.

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

Guinea Pigs

These animals are colony animals, and it is important for their health and well-being to be kept in larger numbers than what Council’s policy imposes As companion animals allowing more appropriate colony sizes poses no threat to community, health, or animal welfare.³

Guinea pigs are primarily indoor pets and invariably kept in small enclosures. These animals do not exhibit extreme noise, are not intrusive and are free of the diseases and pathogens that often plague their wild counterparts. In fact, they pose no health problem for their owners and are renowned for keeping themselves well groomed.

For the Club registered breeding community, the proposed limitations are also unrealistic, especially given the average litter size for some of these species is larger than the proposed limit suggesting that these proposals have not considered the biology and needs of these species. Additionally, due to their short lifespans it is vital that several adult pairs be kept at any given time to ensure that the quality of the gene pool is maintained – without allowing owners to keep ‘breeders’ the health of the species will invariably suffer.

Rabbits

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

Responsible pet owners will have their rabbits desexed should THEY NOT wish to breed.

³ [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004\)](#)

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 two 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 just five!

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Reptiles:

A permit to keep reptiles is already issued by The Department of Energy, Environment and Climate Action, and it dictates how reptiles should be kept.

Reptiles are extremely popular, particularly in circumstances of higher residential density areas, they make no noise, and despite common misconception produce little to no odour. Reptiles come in a range of sizes and husbandry needs. There are a broad range of alternative and legitimate management and housing systems and numerous other factors that should be considered when keeping reptiles/amphibians.

For reptiles, where hundreds of different species are being regulated under State Regulation via the Wildlife Act 1975⁴ and associated Regulations, which governs the keeping of reptiles by setting licensing requirements and regulating which species can be kept.

The vast majority of reptiles are housed in small enclosures, with many enclosures capable of existing in a child’s bedroom or other small space (substantially less than the stated 3999m²). Number restrictions are simply not applicable and are inappropriate for ensuring sound animal welfare standards. The table should simply stipulate the reptiles must be kept in accordance with the Victorian Code of Practice for the Welfare of Animals — Private Keeping of Reptiles.⁵

Birds:

The proposed numbers relating to the keeping of small birds is ill-founded. Clearly no one has been consulted on bird numbers and most importantly bird welfare. The full restriction (without a permit) on the keeping of ‘Large’ birds – separated out with the likes of emus and turkeys is extremely questionable and confusing. Especially when one needs to ‘mind read’ as to the difference of a large bird and a small bird?

What is a ‘large’ bird? A rosella, a macaw, or a galah? When does a bird go from being ‘small’ to ‘large’? Some will argue a pet rosella or conure is small while others will deem them large.

Why is it exactly that a person cannot keep a rosella (if indeed they are ‘large’ birds) on any sized property without a permit? Why exactly does Council need to approve this?

Restrictions based on numbers of birds are archaic and reflective of animal rights ideologies. Birds come in a range of sizes and temperaments, many are flock species, there is a broad range of alternative and legitimate management and housing systems and numerous other factors. For birds, where hundreds of different species are being regulated, numbers are simple for legislators but inappropriate for ensuring sound animal welfare standards.

Animal Care Australia strongly recommends Council excludes the restriction of birds when the resident is keeping their birds in compliance with the Agriculture Victoria’s Code of Practice—

⁴ [Wildlife Act 1975](#)

⁵ [Code of Practice for the Welfare of Animals — Private Keeping of Reptiles](#)

Housing of Caged Birds. ⁶

If numbers are to be restricted, then doing so according to this code has legitimacy and should be based on the housing needs of the particular species in question, for example keeping of requirements for canaries is vastly different to those of budgies. It must be breed and husbandry need specific. Thirty finches have far different needs than thirty budgies.

Councils' restrictions are not supported as your residents would be hobbyists and current nuisance laws with regard to noise, odour, vermin, etc. are sufficient to ensure neighbour amenity is maintained should any problems occur.

Animal welfare is NOT about numbers – it is about the conditions, behaviour, cleanliness, housing, and husbandry that each animal is kept under by the owners – your residents.

Mandated policies that restrict the keeping of animals on the basis of preventing noise, odour or other issues for neighbours are strongly discouraged. Restrictions including permit requirements inflict an unnecessary compliance burden on residents and staff which only discourages animal keeping needlessly. Laws are already in place to deal with neighbourhood nuisance issues including matters due to poor animal keeping practices. Any excuse that these restrictions have previously existed simply highlights the level of laziness in ensuring the most up to date animal welfare needs and community expectations are being met.

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

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

Kind regards,



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⁶ [Code of Practice—Housing of Caged Birds](#)

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