

9th November 2025

City of Melton Council,
Email: damp@melton.vic.gov.au

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 commends Council on accepting written submissions and not utilising the single use of surveys as a means of claiming consultation. Surveys on their own 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 = est. 234,610 (2024/25)
- registered dogs = 15635 (est. 26-24k)
- registered cats = 5800 (est. 25-37k)
- 9 designated off-leash exercise areas (1737 dogs each area per day if all exercised daily)
- Dog/cat number limits = 2 of each (land size < 4000m²), 5 (between 4000m² and 20000m²)
- Excess animal permit = \$87 annual/biennial? (renewal), \$120.60 initial biennial fee/application

Key Commendations and Great Initiatives:

Animal Care Australia commends Council on:

- ✓ Very extensively researched DAMP with references to peer-reviewed papers on various topics – especially relating to cat management and the classifications of cats in the community (domestic, semi-owned or community cats, and feral).
- ✓ Extremely well thought out action plan to address stray cat numbers.
- ✓ Council’s website has comprehensive information for animal related matters – also available in multiple languages via built in translation software.
- ✓ Council has a dedicated Animal Management team and has added two extra Rangers since 2021-25 DAMP was implemented. A total of four Rangers plus a Team Leader in field.
- ✓ Staff training plan is comprehensive and designates when training will be completed or conducted for each type of team member.
- ✓ Well thought out plan for improving pound facility and services further – and high number of 84Y agreements already secured to assist moving animals out of the pound alive.
- ✓ Acknowledgement that a large percentage of residents are financially compromised and may need assistance to comply with pet ownership requirements.

Overall, this DAMP acknowledges areas of concern and how Council intends to approach them – but Animal Care Australia has the following concerns and feedback:

Council website:

Only issue identified is that fees for all services offered could be detailed on those pages, rather than having to sign up to the online portal to fill out the forms and then finding out what they will cost.

Page 6 of the draft DAMP:

This section explicitly acknowledges sentience of animals. This is not necessary as the fact animals are sentient is addressed implicitly by the Five Domains underpinning current animal welfare legislation.

Use of ‘within operational budget’:

Quite a strong proportion of actions listed in the plan are marked “within operational budget.” It is noted by Animal Care Australia that this inclusion technically allows for these actions to not occur, especially if other areas use up more of the budget than anticipated.

Further suggestions:

- Release fees, daily impound fees, registration and microchipping fees, and infringement fines/fees will be a deterrent to people reclaiming lost pets from the pound. When accumulated those fees are simply not achievable by anyone on a low income (or pension).

Council could look into reducing some or all of those fees and/or implement payment plans to assist low-income residents to reclaim their pets.

- Animal number caps should be advisory and only enforced if compliance issues arise with a particular pet owner. **Mandatory Excess Animal Permits should be scrapped.**
- Registration fees could be lowered, and if excess animal permits are scrapped, Council is more likely to see a better uptake of pet registrations across the LGA, as many residents may be in breach of animal number caps but averse to paying extra to keep them.
- Council could look into offering free or low-cost microchipping and desexing vouchers to low-income residents. Look into partnerships with other agencies - there are a number of community and state government supported providers of this service - or approach local vet clinics that may be able to assist, especially given the state government grants can be sought to allow council to provide these services also.

- Council could implement a “first ride home free” program for registered pets found straying. Many other councils have implemented this program to good effect.
- Council only has 9 designated off-leash areas. If all 15635 registered dogs alone were to be exercised off lead each day, that would equate to 1737 dogs exercising in EACH area EACH day. Suggest Council urgently look into designating more off-leash areas to reduce overuse of existing areas.

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

In closing:

It is necessary to call your attention to Appendix 5: Melton City Council Local Law 2025 – Part 6 ¹ within the website Table – How many animals can I keep?

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.

The limiting of a total of only 5 ‘rodents’, a limit of only 20 small birds, and the limit of only 5 reptiles on residential premises (land 4,000m² or less) is **NOT SUPPORTED by Animal Care Australia** as this contradicts the needs of the individual species – in particular rodents where there are multiple species of rodents kept as pets.

Small Mammals – listed as ‘Rodents’:

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.

Ferrets

Ferrets have become much loved companion pets and while they do require some care, maintenance and ensuring that they are kept very entertained and occupied when awake, they in fact do not require a lot of space which makes them perfect as ‘indoor’ pets.

Ferrets are far more secure indoors and escapes into the environment are far less likely to occur with an indoor kept pet than an animal out in a cage.

Ferrets are also social animals and should be kept at a minimum as pairs or in groups, therefore Council’s restriction is uneducated, ill-advised, and most definitely **NOT SUPPORTED**.

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. ².

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

¹ [How many pets can I have?](#)

² [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004\)](#)

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.

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!

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.

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 1975³ 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.⁴

Birds:

The proposed numbers relating to the keeping of caged birds is ill-founded. Clearly no one has been

³ [Wildlife Act 1975](#)

⁴ [Code of Practice for the Welfare of Animals — Private Keeping of Reptiles](#)

consulted on bird numbers and most importantly bird welfare.

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—Housing of Caged Birds.⁵

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 galahs. It must be breed and husbandry need specific. Twenty finches have far different needs than twenty galahs. Both could be confidently kept on land of less than 4000m².

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.

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.

It is excruciatingly clear these restrictions have been authored by ill-informed, and potentially species biased persons. 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 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,



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

⁵ [Code of Practice—Housing of Caged Birds](#)

Appendix 1: Comparison Report: Melton City Council Domestic Animal Management Plans

Comparison between the Domestic Animal Management Plan (DAMP) 2026–2029 and the previous DAMP 2021–2025.

1. Strategic Direction and Tone

Aspect	2021–2025 DAMP	2026–2029 DAMP and Key Changes
Tone & Approach	Modernising animal management; community partnership; pets in wellbeing agenda.	Evidence-based, data-driven approach linking demographics and social research.
Vision Statement	Connected to Council & Wellbeing Plan 2021–25.	Aligned with Vision 2051, sustainability and inclusion focus.
Community Messaging	Creating safe and liveable communities for people and pets.	Focus on research, science and collaboration – service excellence message.

2. Data, Demographics and Community Engagement

Aspect	2021–2025 DAMP	2026–2029 DAMP and Key Changes
Pet Ownership Data	Based on 2021 Pet Survey (93% view pets as family).	2025 Survey (97% view pets as family). Stronger focus on social connection.
Demographic Analysis	Limited demographic focus.	Detailed link between CALD, income, and age demographics; data used for service design.
Community Consultation	Survey and expo feedback.	Comprehensive Pet Survey 2025 and behavioural data integration.

3. Staff Development and Service Structure

The 2026–2029 DAMP formalises mandatory training requirements including aggressive dog handling, breed identification, investigation and welfare awareness under the MARAM framework, reflecting a professionalised and safety-driven culture.

4. Animal Welfare and Service Priorities

Key progression areas include:

- Stray Cat Management: escalated to strategic priority #1 with research-based interventions.
- Dog Control: combines education and enforcement.
- Pound Services: Feasibility Study underway for future model.
- Rescue Partnerships: expansion from 28 to 56 foster care groups.
- Registration: focus on education and incentives.

5. Governance, Legislation, and Policy Integration

Updated to align with Local Law 2025, the Domestic Animals Act 1994, and Council's Wellbeing Plan 2025–29. The plan integrates gender equity, environment, and technology initiatives to modernise compliance and service delivery.

6. Community and Education Focus

The 2026–2029 plan introduces continuous education programs, including in-school sessions, community pound visits, and enhanced use of digital communication to improve transparency and trust.

7. Action Plan and Measurement

Maintains the annual review requirement but incorporates performance monitoring through data analytics and customer enquiry trends. Measurable indicators are embedded in the consolidated action plan.

8. Key Improvements Summary

- Evidence-based and data-informed planning.
- Expanded welfare and gender awareness integration.
- Proactive partnerships and rescue collaboration.
- Professionalised staff training.
- Strategic investment in facilities.
- Transparency and community trust initiatives.
- Alignment with Council's 2051 vision.

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