

24th October 2025
Compliance Coordinator
Rural City of Wangaratta
Email: Council@wangaratta.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.

With this in mind, **Animal Care Australia commend Council on the following:**

- ✓ Relatively low pet registration fees - compared to some Victorian councils
- ✓ Councils’ current education activities
- ✓ Looking into establishing a cat containment policy

DOMESTIC ANIMAL STATISTICS AND DATA

Category	2022/23	2023/24	2024/25
Dogs			
Number Registered	4258	4367	4074
Cats			
Number Registered	1453	1439	1253

As per the above table, the municipality is currently in a good position in relation to animal registrations. The rate of animals registered has remained steady over the past three financial years. This may be attributed to an increase in public education as well as the introduction of reminder messages being sent to mobiles along with pro-active registration follow-up.

Animal Care Australia does not agree with summation above. With a population of c.30,000, the number of households is approximately 13, 600, and the national average for pet ownership is around 70%, which means that possibly more than half of the actual pets (cats/dogs) in the shire are not registered. The table also actually shows a decrease in the numbers of pets being registered.

That said, registration fees are reasonable, but there is room for a reduction of those fees, and a removal of the excess animal permits (unless used to encourage individual irresponsible owners to comply), to incite more pet owners to register their pets. Pet number restrictions should really only be enforced when there are proven compliance issues needing to be rectified.

Specific Comments:

- **Training of authorised officers:**

The Community Compliance Team comprises 4 active officers. Given the officers appear to be multi-tasked to ALL local laws' compliance activities, it is unclear in the training section for these officers whether any have completed any formal qualifications such as Cert IV in Government Investigations (Regulatory Compliance), or any other qualifications for that matter. The training plan is also rather vague regarding timeframes to complete the suggested tasks. "Ongoing" and "as offered", and a complete lack of any formal qualification training/courses don't quite indicate that training is a high priority.

- **Registration and identification:**

Council does have relatively low registration fees (compared to other Victorian councils) however, Animal Care Australia encourages Council to consider reducing them some more to encourage more owners to register their pets. Removal of excess animal permits (for everyone other than individuals who prove they are not responsible pet owners) will also see an increase in registrations as those who may have more pets than the caps allow will not need to "hide" them any longer. Caps and permits should only be used as an enforcement tool in cases where owners act irresponsibly.

Current education activities should have the inclusion of local community groups and businesses to distribute brochures, raise the issue of responsible pet ownership, etc.

Current compliance activities are comprehensive but come across as more punitive than educational. Animal Care Australia strongly suggests that warnings and advice or help (if required) be the first activity undertaken when dealing with pet owners, rather than infringements/fines.

- **Nuisance:**

Animal Care Australia supports Council looking into establishing a cat containment policy, but suggest Council look very carefully at what that may entail regarding the numbers of cats that will need to be taken to the pound if trapped. It would be remiss for council to label all unchipped cats as "feral" and summarily destroyed. Council should also consider the need for support of cat owners in developing means of containment to their properties. Simply expecting cats to be locked up indoors is not good animal welfare.

Mandatory desexing is not recommended. Registration fees are already reduced if the pet is desexed, so making it mandatory is moot and is likely a result of low registration fees. A better spend of ratepayer money would be to investigate offering low-cost or free desexing to financially compromised residents instead. Encourage residents to register not discourage them.

- **Dog attacks:**

It doesn't appear that Council have been recording dog attack data in a manner that would produce statistical information. Animal Care Australia suggests that this is rectified as soon as possible so that compliance activities listed can be measured to ensure they are effective.

Currently there are 7 designated off-leash areas in the LGA, and ALL of them are located in or around the township of Wangaratta. Considering the current registrations of 4074 dogs, and if they were ALL to need exercising off-leash daily – that would equate to 582 dogs for each area each day. That is impractical.

Again, education BEFORE regulation seems lacking. Face-to-face compliance activities should always start with education before enacting more punitive measures. Authorised officers should be looking for opportunities to educate rather than fine those found not complying – sometimes a friendly warning works better than a fine.

- **Dangerous, menacing and restricted breed dogs:**

Activity	When	Evaluation
Assess certain breeds with the gazetted standard for potential restricted breed dogs.	Ongoing	Number of Restricted Breeds Declared from registration database.

Considering the lack of recorded formal training given to current compliance officers, Animal Care Australia is unsure how this activity will be conducted accurately or without certain biases (even if unintended). Animal Care Australia does not support unqualified compliance officers conducting breed type assessments based on what a dog may look like. Many crossbreeds do not necessarily look like any of their mix main breed types, and others not of a restricted type may look similar to a restricted type (red kelpie crosses for example).

- **Overpopulation and high euthanasia:**

Animal Care Australia notes impound/release fees are not listed on Council's website, not to mention that the contracted pound is 55km away in NSW (Albury).

The contract for the pound service was initiated in July 2023 and slated to run for 2 years. This contract period has now ended – has it been renewed? Are Council actively looking at establishing a local impound facility to serve its residents more effectively? High release fees on top of any infringement, registration, et al may deter residents from reclaiming impounded animals. Council should look at initiatives enacted by other Councils that encourage, educate and assist residents in being able to re-collect lost pets without the fear of incrimination.

- **Emergencies and animal management:**

This is supported but does need to be prioritised. Council has a responsibility to residents (and their animals) in emergencies – especially if residents are displaced due to the emergency and are unable to manage their animals as usual.

Keeping of animals and extra animal permits:

It is necessary to call your attention to animal restrictions within the DAMP as this is where Council should be ashamed in its approach to pet ownership. Appendix 1: Local Law 1 of 2025 PART G – ANIMAL MANAGEMENT.

Australia DOES NOT support the number restrictions listed in the table below and the limit of only permitting three species is outrageous and Council should be ashamed of having an anti-pet keeping policy such as this.

41.1.2 keep or allow to be kept any more than three (3) different species or groups of Animals listed in Tabel 1 in this Clause 41, at any time.

It is our hope that while Council is reviewing the Domestic Animal Management Plan you will consider approving amendments to these restrictions taking into consideration our feedback and provide the opportunity for residents to keep their pets without the need for permits as long as they are being kept under good animal welfare standards.

The restriction on birds, rabbits, rodents, reptiles and 'any other animal' are in contradiction of the animal welfare needs of all of these species.

This table is completely out of touch with pet keeping in Australia and the community expectations of being able to keep pets freely while still maintaining the animal welfare standards.

Small Mammals:

First and foremost, the inclusion of hamsters in this Table highlights the level of how uneducated the author/s of this Table are. Hamsters DO NOT exist as pets in Australia. Hamsters are illegal to own in Australia due to biosecurity and biodiversity risks. While certain hamsters can be imported for tightly controlled research, they cannot be kept as pets.

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 such small numbers is simply poor animal welfare.

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.

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**.

Rats, Mice and Guinea Pigs

The limit of just two (2) animals in a Unit/flat or 5 on land greater than 400m² is **NOT SUPPORTED** by Animal Care Australia.

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. ¹.

Rats, mice, and 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 also 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. The restriction of one rabbit on land less than 399m² is against the animal welfare needs of the species and therefore it is disappointing Council is claiming these restrictions are for animal welfare outcomes.

The blatant species-bias against small mammals shows a clear lack of knowledge regarding their keeping.

Cats:

Restrictions (without a permit) to just two cats on any sized property are **not supported**. There is simply no justification to restricting cats to just two.

Dogs:

Restrictions (without a permit) to just two dogs are **not supported**, Having only two dogs on any sized property is not good welfare and does not consider the breed (i.e.: size) and is clearly an uneducated view.

There are no animal welfare justifications to this restriction – especially when considering small breed dogs.

Reptiles:

The mere inclusion of reptiles in this Table contradicts your own clause:

40.1 This Part does not apply to:

40.1.4 any Animal in respect of which a Permit has been issued by another public authority.

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

¹ [Short Communication: Rats Demand for Group Size - Journal of Applied Animal Welfare Science 7 \(4\) 267-272 – 2004](#)

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 1975² 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.³

Birds:

The proposed numbers relating to the keeping of caged birds is ill-founded. Clearly no one has been 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.⁴

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.

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.

² [Wildlife Act 1975](#)

³ [Code of Practice for the Welfare of Animals — Private Keeping of Reptiles](#)

⁴ [Code of Practice—Housing of Caged Birds](#)

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, stylized 'M' and a long, sweeping underline.

Michael Donnelly

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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