

19th December 2025

Darebin City Council,
Attention: Jessica Creed
Team Leader Local Laws and Animal Management
Email: pets@darebin.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 **DOES NOT SUPPORT the single use of surveys as a means of claiming 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, especially when the responder is limited to a set number of characters.

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:

- 2144 community feedback responses to initial engagement on animal management issues – 879 online survey responses, 1136 quick poll, 114 community pop-ups, 11 key stakeholders, 4 email responses
- Population = 158,210 (32% non-English speaking at home – c.1444 first nations residents)
- Registered dogs = 9912
- Registered cats = 4950
- Registered dangerous/menacing dogs = 18
- 10% euthanasia rate increase for impounded dogs and cats – less animals reclaimed in 2024/5
- Greater reliance on 84Y partners to rehome impounded animals
- Plan developed in partnership with neighbouring councils (Merri-bek and Whittlesea)

- Council-run pound facility – wat djerring Animal Facility

Key Commendations and Great Initiatives

Animal Care Australia commends Council for:

- ✓ Level of the requirements and training to qualify as an authorised officer
- ✓ A dedicated Facebook page for Animal Facility (pound) – Darebin Lost Animals
- ✓ Having 84Y agreements in place and in particular the animal facility partnership with rescue groups for neonate kitten foster care
- ✓ Domestic Violence support initiatives for pets caught up in those situations
- ✓ Seeking funding for desexing, vaccination, microchipping, and registration of community cats' program
- ✓ Having 33 off-lead areas in Darebin, and another 2 fully fenced areas in Reservoir and Bundoora
- ✓ Informed pets' section of website, as well as the website can be translated into other languages via embedded site software

Training of authorised officers:

Animal Care Australia commends this statement:

“Darebin’s Local Laws and Animal Management team members are all authorised officers. It is a requirement that all authorised officers have, at minimum, Cert IV in Animal Regulation & Management and Certificate IV in Government Investigations (or worked within the industry more than 4 years) and undertake all Council required training”

While the training plan listed in this DAMP here looks suitable, the DAMP fails to state how many officers are dedicated to animal management duties, full time, or part time?

Responsible pet ownership:

Authorised officers should be encouraged to take the approach of education before regulation – simply issuing infringements does not address the underlying issue at hand if the resident was truly unaware of their obligation under the law. Animal Care Australia strongly recommends first offences be free from fines – with written directions to improve/remedy the issue.

Animal Care Australia acknowledges the plan to address specifics regarding responsible pet ownership in this DAMP and these appear adequate, however, whenever *“when grants/funding available”* is always concerning as these often get forgotten or suffer from under-funding and tend to fail or create space for larger issues to develop.

Animal Care Australia support 24-hour cat containment to owner’s property, with the caveats that there is a phase-in period, and Council provide assistance to residents who need to erect containment measures.

Overpopulation and euthanasia rate:

While Animal Care Australia commends Council for having 84Y agreements, we recommend looking further afield to ensure Council can further reduce euthanasia rates.

Further to the above point, if Council are running targeted trapping exercises, then checking with 84Y partners if they have capacity to take on any cats that are able to be re-homed before initiating said trapping programs is necessary. This will reduce cat euthanasia rates.

Mandatory desexing of cats and dogs is NOT supported as a requirement for registration of animals. It is our experience this often one of the reasons animals are not registered, the other being the cost of the registration. Combine that with the costs of desexing and it becomes far too expensive. Fear

of then being penalised for not having their animals desexed at the point of registration adds to the fear and trepidation of your residents. A better promotion from Council would be to promote the desexing of puppies and kittens before sale, unless being sold by a breeder who is a member of an Applicable Organisation (such as Dogs Victoria).

Animal Care Australia also draws Council's attention to the fact reclaim fees, infringement fines, and other costs will deter owners from reclaiming lost pets from the pound. Animal Care Australia advocates for Councils to provide payment plans for low-income owners to be able to reclaim their lost pets and a "first return home free" scheme for registered pets caught straying.

Registration and identification

Mandatory Animal number caps and Excess Animal Permits are NOT supported, as these are a deterrent to registering pets, especially if residents have more than the mandated numbers of pets listed in Local Laws and also need to get an excess animals permit on top of registration costs.

Animal Care Australia strongly recommends scrapping mandatory caps and using these only to enforce compliance after an amenity issue has been identified.

When comparing to other Councils, the registration fees are also somewhat high. There is certainly room to decrease these to encourage a greater uptake by pet owners. Animal Care Australia note that registration fee structure is to be reviewed as an action item in this DAMP and strongly suggest a downward trend for fees, rather than upwards.

Equally if unregistered pets are found during random patrols, education and allowance for resident to pay registration within a suggested timeframe should be the first course of action before issuing an infringement notice/fine.

Nuisance:

Again, Animal Care Australia commend council for the provision of 30 plus, designated off leash exercise areas for dogs. In a number of Council areas there has been a developing trend of reduction in public spaces that dogs can be present in, which has significantly reduced the opportunity for general socialisation in unfamiliar environments.

Dog attacks:

Unfortunately, a "dog attack" in this context of statistics within this DAMP can be as little as an over-friendly dog running up to a person or other animal to initiate play or greeting (rushing).

Animal Care Australia strongly recommends statistics need to be broken down into the forms of "attack", and whether they resulted in physical injury to the target or the "attack".

This is vital in order for Council to collect and review a better breakdown of these statistics before acting on the current incomplete indicators or developing targeted education on the real issues.

In closing:

In reviewing Council's Local Laws Animal Care Australia would like to raise the following concern:

The numbers listed for species within Part 3 Section 25 – Community Amenity Local Law 2025 are contradictory to the animal welfare needs of the species. These will lead to animal welfare issues which leads us to believe they have simply been 'made up' – likely based on personal bias rather than facts.

Species Specific comments:

Restrictions on the numbers of animals on a property is **not supported by Animal Care Australia** without full consideration of the animal welfare impacts on the individual species, particularly

where key stakeholders have not been consulted – as apparent by the proposed restrictions in this Policy.

Animal Care Australia questions the validity of the proposed number restrictions and the method of ascertaining specific numbers for each species. There appears to be no logic to the methodology in this circumstance, and this applies throughout a number of species.

Birds – Aviary, and others

For birds other than poultry, the numbers proposed **are NOT SUPPORTED**.

There are hundreds of avian species routinely kept in Victoria and every species has its own specialised management, husbandry, enclosure size, and welfare requirements. Placing a limit of just ten (10) birds is simply ill-founded. Finches are far smaller and much quieter than pigeons, as an example. Therefore, we recommend the removal of the restriction of fifteen and insert: To be kept as appropriate to species, size of cage/aviary or bird room' into the Table.

The bird numbers within this entire Part shows a clear lack of knowledge regarding bird keeping and its enormous breadth and management techniques.

It should be noted that the keepers of some poultry may be members of Agricultural Societies, and the keepers of avian birds could be members of Avicultural Societies. Council could include "Members of avicultural clubs, are exempt from the above limits provided their birds are kept such that they do not unreasonably affect the amenity of neighbours."

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.

The following clause is confusing – especially when considering the small mammals are listed on one line with a total of 5 allocated.

“(2) An occupier of any land must not, without a permit, keep or allow to be kept on that land any more of each of the species or group, or type of animals than is stated in the following Table:”

So, because the table states: ‘Small animals - mice, rats, ferrets, guinea pigs, rabbits, etc’

Does that mean a limit of only 5 of the small animal group OR is it 5 of each type of animal OR is 5 of each species? Remembering the above are all RODENTS (species – with the exception of the ferret) So is it only 5 rodents?

Councils' website¹ includes 'hamsters' (assuming that is what the 'etc' is on this Table? Hamsters are not legally permitted to be kept in Australia. This again highlights the lack of knowledge held by the author/s of these restrictions.

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.

¹ [Council website: Pet Permits](#)

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 of on ferrets is impractical, uneducated, ill-advised, and most definitely **NOT SUPPORTED**.

Rats, Mice and Guinea Pigs

The limit of just five (5) animals **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.²

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 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 eight or just two!

Reptiles:

The mere inclusion of reptiles in this Table is unnecessary. The limit of 5 is ludicrous and reeks of species bias and not animal welfare. This is especially true given reptiles do not create an amenity issue, such as noise or odour etc, when they are housed in enclosures and for 99% of species – indoors.

The permit to keep reptiles issued by The Department of Energy, Environment and Climate Action, already 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.

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

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. 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

Animal Care Australia recommends references within the Table are replaced with a reference to Animal Welfare Victoria's Codes of Practice relevant to each species, such as AWW's Code of Practice for the Housing of Caged Birds.

The website also states that “**Any other animals not listed above**” is not permitted.

Firstly, reptiles are not listed on the website and yet they are included in the Local Law Table? The website does not refer residents to the Local Law table – so that in itself is misleading at best.

Secondly, why are residents not permitted to keep fish, or pet frogs etc? These are ALL animals NOT LISTED.

This entire section 25 is antiquated, out-of-touch with the community, includes massive overreach and is totally unnecessary.

If Council wishes to persist with numbers, then it should be made clear that council officers will look to providing an exemption (no permit required) for those keeping their pets in a manner that does not unduly affect neighbourhood amenity.

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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³ [Wildlife Act 1975](#)

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

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