

13<sup>th</sup> June 2026

Mayor, Councillor Paige Kennett  
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Community Laws Team - Local Law Review  
Knox City Council

Email: [LocalLawReview@knox.vic.gov.au](mailto:LocalLawReview@knox.vic.gov.au)

### **Re: Draft Local Law**

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.

Animal Care Australia notes that correspondence has been consistently provided to Knox City Council calling out the extraordinary decisions by Council to reduce pet ownership numbers that place the animal welfare of the species at risk, particularly colony or social species.

Animal Care Australia has provided correspondence on the following occasions:

- **March 19<sup>th</sup>, 2026 – response to Local Law review – Phase 1.** This correspondence directly questioned the 4000sqm rule change and the lack of animal welfare consideration for pets – particularly the proposed numbers for birds and small mammals.
- **October 20<sup>th</sup>, 2020 – response to review of the Amenity Local Law:** Our advice provided in this communication was ignored as well and the Local Law was passed introducing pet restrictions.

The fact that all of the earlier submissions were also forwarded to the Mayor and Councillors (as listed on Council’s website at each point in time), it is a clear statement that Council has chosen to ignore our correspondence. Not directly responding to our concerns about any of those submissions, further exacerbating the risk of poorer animal welfare outcomes in the future.

What is the point of consulting if Council’s Animal Management Team are going to ignore the responses received – especially from a national organisation. The clear response to that figurative question is so that Council can claim it met the requirement to consult.

To be clear – AGAIN - Animal Care Australia DOES NOT SUPPORT the numbers listed in the proposed Table within Section 4.2 of the new Draft Amenity Local Law 2026.

Furthermore, the actual documentation provided in the Round 1 consultation showed no detail as to how many properties exist over 4000m2 that will be affected and will now need to seek and pay for excess animal permits. Animal Care Australia does note the overall dwelling context of the LGA as of 2021, states there were 62,011 total dwellings in the City of Knox, of which 82.4% were separate houses (approx. 51,047). While most are standard suburban blocks, a segment consists of these larger properties, frequently in "Bush Suburban" or "Low Density" areas. Therefore

approximately 17% or so will likely be affected alluding to a lack of substantial validity or reasoning as to WHY Council made the decision to further decrease animal number caps across ALL residence types.

Of course, the most obvious is NOT about community amenity but rather income raising. This is especially significant for those residents who may currently be conforming to Local Law numbers, but once the new laws come into effect, they will now be required to pay for an excess animal permit or reduce their animal numbers some other way in order to comply. As already highlighted, bird owners will be unfairly disadvantaged under this new change.

Therefore, the claim that it won't affect how many animals you can keep is a blatant misrepresentation of the truth. To date owners with larger properties will have been able to keep many animals due to the land size – WITHOUT excess animal permits.

It is vital that Councils support the keeping of all pets within their local government areas and that Councils consult with the appropriate stakeholders when looking to address the uneducated members of the public who utilise the amenity provisions as an excuse in relation to the keeping of some animals in order to achieve the many myths or phobias they have against animals, particularly rats, mice and reptiles.

The other outcome will be more residents who choose to ignore the Local Laws and the levels of non-compliance will increase.

**Phase 2 specific feedback:**

Focusing only on the Animal Management component of this review, I see the following issue.

It appears that the proposed Local Laws have not been altered in any meaningful way **despite the finding that respondents to Phase 1 consultation had serious reservations about the proposed changes.**

See the following screenshots from the Phase 1 consultation review...

Main messages from the community:

- **Animal welfare and management:** support for responsible ownership and safety, alongside opposition to blanket animal limits and a preference for welfare-based approaches that consider care conditions and property context.

Key themes and results:

Animal management	Mixed views on applying animal number limits to all properties, stronger housing and fencing rules, and dog attack measures.	People supported responsible pet ownership and public safety, but many opposed blanket limits and raised concerns about animal welfare, larger properties, renters, vulnerable residents, affordability and practical enforcement.
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Written submissions feedback:

liability, the need for expert oversight, and alternative ways to manage green waste. Two submissions focused on animal management, including opposition to blanket animal number limits, concerns about housing and fencing requirements, and support for education-led, welfare-based approaches.

Somehow from the clear opposition in the feedback the Animal Management team has determined to go with the following summary of what changes are currently proposed:

# ANIMALS

## Supporting clauses

- 30** Limits on the number of animals kept
- 32** Private land adequately fenced

## Description of changes

Amend the land area for excess animal permits to include all land and not land less than or equal to 4,000sq metres.

Propose keeping the numbers of animals the same.

Introduce an exemption for assistance dog or assistance animal.

Add a new clause regulating fencing of animals (specifically dogs) on private land to prevent them escaping the property, to ensure responsible pet ownership as prescribed under the Domestic Animals Act 1994(cats & dogs). There is an option to install and maintain an enclosure instead.

And a comparison of the current vs proposed number restriction tables...

Current:

### Limits on number of animals kept

- 4.1 An **owner** or **occupier** of **private land**, the area of which is less than or equal to 4,000 square metres must not, without a **permit**, keep or allow to be kept on that **private land** any more in number for each animal than is set out in the following table:

Type of animal	Number
Dogs	Two (2)
Cats	Two (2)
<b>Poultry</b>	Five (5)
<b>Small birds</b>	Twenty Five (25)
<b>Large Birds</b>	Five (5)
Ferrets, Guinea Pigs, Rabbits or Rodents	Five (5)

Proposed:

### 30. Limits on number of animals kept

- (1) Without a **permit**, an **owner** or **occupier** of **private land** must not keep or allow to be kept on that **private land** any more in number for each animal than is set out in the following table:

Type of animal	Number <sup>1</sup>
Dogs	Two (2)
Cats	Two (2)
<b>Poultry</b>	Five (5)
<b>Small birds</b>	Twenty five (25)
<b>Large Birds</b>	Five (5)
Ferrets, Guinea Pigs, Rabbits or Rodents	Five (5)
<b>Rooster</b>	Nought (0)
<b>Livestock</b>	Nought (0) if private land is less than 4,000 sq metres.

So now every resident living on a 4000m<sup>2</sup> block that currently has more than the prescribed number of animals as set out in the proposed changes must now apply **(and pay)** for an excess animals

permit – current cost to do that is \$295 (\$188 non-refundable application fee, and \$107 permit fee - and the permit fee is an annual cost thereafter).

Animal Care Australia also notes the inclusion here of Roosters as a line item = 0. Perhaps Council doesn't understand how chickens reproduce? For eggs to be viable, they need to be fertilised.

So why can't a resident living on land larger than 4000m2 have a rooster to service their hens? On that note, why can't that same resident have more than 5 hens?

This is a clear attempt by Council to profit from its residents who want to breed chickens. There is NO other responsible, reasonable or logical purpose for requiring a permit for a rooster and more than 5 hens on a property greater than 4000m2. THIS DOES NOT PASS THE PUB TEST.

The only aspect of the animal managements components of Phase 2 that Animal Care Australia does commend Council for is stipulating that registered assistance dogs/animals are exempt from being counted against the number caps set out in the tables.

Animal Care Australia do not have any major concerns about the inclusion of containment methods (fencing/enclosures) for pets but do have reservations about how that is going to be monitored/enforced.

Many councils across Victoria are bemoaning the fact that pet registrations are dropping every year, lost animals aren't being reclaimed from pounds, and most roaming animals picked up aren't microchipped or desexed.

This is a direct result of Councils steadfastly sticking to pet number caps and excess animal permits in the misguided belief that the revenue from same will fund animal management functions. Animal Care Australia has seen a growing set of data highlighting every time a review is conducted the supposed revenue streams seem to be decreasing?

It would be more effective to remove the caps and excess animal permits for a cycle of 4-5 years (the term of a Domestic Animal Plan and Local Law review period) to see if less restrictions result in higher voluntary compliance. This must include reducing registration costs. This would see a much higher voluntary take-up, as most people want to be doing the right thing, but when it's too financially restrictive to do so, they will find ways to avoid complying.

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

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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, companion animals, animals used for educational or entertainment purposes or kept for conservation.

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