

12th August 2026

Acting General Manager, Moree Plains Shire Council,

Email: council@mpsc.nsw.gov.au

Re: Draft Animal Keeping Policy

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 the NSW Department of Primary Industries and the NSW Office of Local Government as a key stakeholder in reviews of the NSW Prevention Of Cruelty To Animals Act, Companion Animals Act and the Companion Animals Pet Registry. Animal Care Australia directly consults and advises during these reviews, including revision of Regulations and 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.

The Shire has a rough population of around 12,500 residents – around 7000 live in the town of Moree.

Surely issues with pets or pet owners is not significant enough to warrant enacting policies that restrict the number of pets residents can own? Even future pet owners.

In reviewing the proposed Policy Animal Care Australia would like to raise the following points of concern:

- Animal Care Australia acknowledges Council’s intent to implement this Policy as ‘guidelines’ but this is contradicted by the fact those keeping animals that exceed the numbers proposed PRIOR to the policy, will not be affected.

How can this policy be based on animal welfare needs **if it only** applies to some owners and not others? This strongly suggests this Policy is being introduced to make life easier for Council Officers and because Council has seen other’s attempting to do the same!

This is totally unnecessary as any circumstance of nuisance, noise or odour can be dealt with by existing measures without the need to restrict animal numbers. It is noted that until the creation of this Draft Policy, no policy at all had been in place regarding the keeping of animals in the Shire.

Animal Care Australia also notes that the 3 State Acts referred to in this policy apply regardless of this policy being implemented and already give Council Rangers sufficient powers to act on *“the community’s concerns around roaming and nuisance animals and the impact they can have on neighbouring properties and the overall amenity of our towns and villages”* referred to in the media release announcing the creation of this Policy.

Furthermore, Animal Care Australia strongly recommends Council invest in and implement extensive education of its residents prior to permitting its compliance officers to commence regulating any part of this policy.

- The numbers proposed for dogs and cats contradicts those permitted by State laws which allow up to 20 fertile female dogs on a property.
- The limits (tabled) should ONLY be enforced if/when issues with amenity or welfare arise – NOT as the status quo.

5.8 EXISTING ANIMAL NUMBERS

- 5.8.1 This Policy is not intended to require owners to reduce the number of animals already lawfully kept on a property at the time the Policy comes into effect.
- 5.8.2 Where the number of animals exceeds the thresholds set out in this Policy, Council will continue to assess each matter on its individual merits, having regard to nuisance, public health, animal welfare, environmental impacts and the circumstances of the property.
- 5.8.3 If animal numbers subsequently increase beyond those existing at the commencement of this Policy, Council may apply the Policy thresholds in considering whether the keeping of additional animals is reasonable.

In addition to 5.8.3 being a contradiction of the ‘being implemented for animal welfare reasons’ claim, the above implies that regardless of issues with amenity or welfare being evident, that Council can order owners to reduce their pet numbers. This approach is also NOT supported by Animal Care Australia.

Animal Care Australia strongly suggests that Council redesign the Policy to state directly that number caps will ONLY be enforced if/when an amenity or welfare issue actually arise and other remedial actions have failed – and the stated caps do NOT apply in any other circumstance. Similar approaches in Victoria with any form of mandatory restrictions has only resulted in higher non-compliance, higher non-registration and non-microchipping of pets – despite legislative requirement.

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