Animal Care Australia

2026

2nd November 2026 MD:KG

Assistance Animals Reform
Department of Agriculture Fisheries and Forestry

Email: AssistanceAnimalReform@aff.gov.au

Reviewing import processes for assistance animals

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 welcomes the opportunity to provide feedback on the Department of Agriculture, Fisheries and Forestry (DAFF) review of the process for importing assistance cats and dogs. Animal Care Australia supports strong biosecurity protections and an accessible import pathway for people with disability who rely on assistance animals.

Animal Care Australia has significant concerns that the introduction of fee-for-service arrangements, changes to quarantine arrangements and additional training verification requirements could create unnecessary financial, administrative and operational barriers for handlers and Australian assistance dog organisations.

Animal Care Australia recommends that DAFF:

1. Retain and improve existing reasonable adjustments wherever biosecurity risks can be appropriately managed.
2. Reject full fee-for-service arrangements and retain current assistance animal fee exemptions.
3. If partial cost recovery is considered, publish cost modelling and protect essential adjustments and routine processing through appropriate exemptions.
4. Retain home-based quarantine as the preferred arrangement where required controls can be met.
5. Base any facility quarantine requirement on an individual risk assessment, with suitable disability support and welfare arrangements.
6. Explicitly recognise internationally accredited organisations, Australian professional training providers and owner-trained teams as potential evidence pathways.

7. Avoid exclusive recognition based on membership of a particular international accreditation body.
8. Accept relevant Australian qualifications and specialist experience as supporting evidence, without treating general qualifications as sufficient proof of specialist competence.
9. Provide accessible independent assessment where evidence gaps require it and avoid duplicating reliable existing assessments.
10. Use targeted verification against misrepresentation, with privacy safeguards and proportionate requirements.
11. Publish clear eligibility, evidence, processing, safety and quarantine guidance, together with decision reasons and accessible review mechanisms.
12. Assess cumulative impacts on smaller providers, charities, regional services and people with disability before implementation.
13. Separately examine general import barriers affecting legitimate assistance dog breeding and development programs.
14. Consult affected organisations and handlers on detailed proposals and provide reasonable transitional arrangements.

Please see the attached submission for a full response to the Review.

Animal Care Australia welcomes further consultation on detailed proposals and recommends that substantive changes proceed only after their financial, operational, disability access and welfare consequences have been assessed.

This submission can be publicly listed.

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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About Animal Care Australia

As a nationally recognised animal welfare organisation and Australian Registered Charity, 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

An Animal Care Australia submission:

Reviewing import processes for assistance animals



Animal Care Australia (ACA) is a national incorporated association and registered charity representing the interests of animal keepers, carers, and breeders across a broad range of species.

Animal Care Australia 's purpose is to prevent and relieve animal suffering through education and advocacy, promoting responsible animal care and improved welfare outcomes. Established by experienced animal advocates, Animal Care Australia provides a trusted, evidence-based voice to government and the community.

Animal Care Australia brings together practical experience, species-specific knowledge and contemporary animal welfare principles. We advocate for evidence-based proportionate policies that focus on achieving genuine welfare outcomes for animals. We seek to ensure that the voices and experiences of responsible animal carers are considered in the development of effective animal welfare policy.

Animal Care Australia unites hobbyists, pet owners, and major animal groups to promote high standards of husbandry and safeguard the human-animal bond.

True animal welfare is best driven by education and practical expertise rather than restrictive regulation.

Our guiding principle is simple: ***animal welfare is animal care***

Submission approved: 1st November 2026

This submission has been developed in consultation with a range of members of Animal Care Australia.

This submission provides a broad perspective across all species of pets and companion animals. Animal Care Australia supports the species specific submissions of our member organisations.

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Opening statement

As a nationally recognised animal welfare organisation, Animal Care Australia continues to oppose the metamorphosis of the title of the new Act from POCTAA, to the Animal Welfare Act for Victoria and now the Animal Care and Protection Act.

Response to the Review & Discussion Paper

Recognition of different assistance dog training pathways

Animal Care Australia is particularly concerned that the review may result in recognition requirements that disproportionately favour internationally accredited assistance dog organisations over Australian professional training providers and owner-trained assistance dog teams. While international accreditation provides valuable organisational assurance, it must not become the exclusive mechanism for determining the legitimacy of an assistance animal.

Australia's assistance dog sector includes internationally accredited organisations, Australian professional assistance dog training providers, independent trainers, and owner-trained assistance dog teams. These pathways contribute to access to assistance animals suited to individual circumstances.

They overlap: an Australian professional provider may also hold international accreditation, and an owner-trained team may receive professional support.

Animal Care Australia advocates for a transparent, competency-based recognition framework that recognises all legitimate training pathways. Appropriately trained assistance dogs should not be disadvantaged solely because of the accreditation status of their provider.

An accreditation-exclusive framework could create a competitive advantage for providers with international accreditation, disadvantage smaller Australian organisations, restrict recognition of owner-trained dogs and increase certification and compliance costs. It could also reduce consumer choice, undervalue Australian professional expertise, and create inconsistencies between domestic disability protections and import recognition.

The discussion paper does not propose mandatory Assistance Dogs International (ADI) or Internation Guide Dog Federation (IGDF) accreditation.

Animal Care Australia raises this issue as a potential implementation risk requiring explicit safeguards, rather than as an existing departmental proposal.

Key concerns and recommendations

Animal Care Australia's principal concern is that reforms intended to improve integrity and sustainability must not restrict access to legitimate assistance animals or undermine Australian training and assessment pathways. Animal Care Australia recommends that DAFF:

- Retain and strengthen reasonable adjustments for legitimate assistance animal handlers.
- Reject full fee-for-service arrangements and retain existing fee exemptions for the assistance animal pathway.
- Retain home-based quarantine as the preferred option where biosecurity requirements can be met.
- Recognise international accreditation as one evidence pathway, without making it mandatory or exclusive.
- Develop consistent competency-based verification and accessible independent assessment options where required.
- Recognise relevant Australian qualifications and specialist professional experience as supporting evidence.
- Avoid unnecessary certification costs, duplication and geographical or administrative barriers.
- Consult Australian providers of different sizes and organisational models, including those outside international accreditation structures.
- Address deliberate misrepresentation through proportionate, evidence-based verification.
- Assess cumulative impacts on disability access, animal welfare, and the viability of Australian assistance dog services before finalising reforms.

Animal Care Australia supports strengthening the integrity of the import pathway. Equally competent dogs should have fair access to reasonable adjustments across legitimate training pathways. Animal Care Australia recommends that substantive changes to fees, recognition or quarantine not proceed until their potential consequences have been assessed and detailed arrangements have been publicly consulted on.

Recognition of Australian assistance dog organisations

(Relevant discussion paper questions 12 and 13)

The paper seeks views on preventing misleading claims and the evidence required to demonstrate assistance animal status. It identifies the need for assurances about training and behaviour without specifying an exclusive accreditation model.

Animal Care Australia supports reliable verification. However, a framework relying solely on a prescribed private accreditation body could exclude competent Australian providers and assess an animal primarily through its trainer's organisational affiliation. International accreditation can provide valuable assurance but should not replace consideration of the animal's demonstrated training and behaviour.

Possible consequences include increased costs for smaller providers, restricted recognition of alternative training pathways, reduced competition and fewer specialist or regional services. These are risks to be evaluated, rather than established outcomes of the discussion paper.

Animal Care Australia recommends multiple evidence pathways, including recognised organisational records, reports from appropriately competent Australian assistance dog professionals, disability-related training evidence, and public access assessments. Independent assessment should be available where reliable existing evidence is insufficient. Requirements should be published and applied consistently.

Financial impacts on handlers and Australian organisations

(Relevant discussion paper questions 7 to 10)

The paper states that DAFF currently waives all fees associated with the assistance animal import pathway. It seeks views on full and partial fee-for-service models and notes that nearly half of arrivals occur outside normal business hours or require additional post-entry quarantine resources.

Animal Care Australia does not support full cost recovery for legitimate assistance animal imports. Assistance animals provide disability-related support; charges may restrict international travel for work, medical treatment, family commitments, or leisure. Reform should consider the cumulative costs of travel, veterinary preparation and import requirements, alongside additional disability-related expenses.

Animal Care Australia recommends DAFF assess the compatibility of any charging model with its disability discrimination obligations. This submission does not assume that every fee would be unlawful; the impact depends on its design, exemptions, and application.

Australian assistance dog organisations may also incur costs when assisting clients with travel and return arrangements, preparing verification records and responding to additional assessment requirements. Smaller and charitable providers may have limited capacity to absorb those costs, potentially diverting resources from training and placement services.

Distinguishing working assistance animals from program imports

Organisations may import prospective assistance dogs or breeding stock and participate in international training partnerships. These animals should not be assumed to qualify for the existing assistance animal pathway merely because they are intended for an assistance dog program. The paper focuses on assistance animals supporting handlers with disability.

Animal Care Australia requests a separate examination of general import barriers affecting legitimate breeding and development programs, including the effects on access to suitable working lines. This is a request to broaden consideration of sector impacts, rather than a claim that the proposed assistance animal fee changes necessarily apply to breeding stock or dogs in training.

Animal Care Australia recommendation

Animal Care Australia recommends maintaining existing fee exemptions, publishing cost modelling, and assessing the effects on handlers and providers before introducing charges. If partial cost recovery is pursued, essential disability-related adjustments, routine application processing and necessary biosecurity support should remain exempt. Any residual charges should have transparent limits and accessible hardship provisions.

DAFF should also examine exemptions or concessions for eligible charitable and not-for-profit activities, without assuming that organisational status alone establishes eligibility for the assistance animal pathway.

Quarantine arrangements and animal welfare

(Relevant discussion paper question 11)

The paper states that assistance animals predominantly undertake mandatory post-entry quarantine at their home residence, subject to specific biosecurity requirements. It seeks views on using departmental facilities instead and refers to case-by-case review of arrangements.

Animal Care Australia supports home-based quarantine wherever required biosecurity controls can be met. Animal Care Australia does not support a blanket move to facility-based quarantine where suitable alternatives manage the identified risk.

Separation from handlers

Separation may disrupt disability-related support, daily functioning and established working routines. Handlers may need alternative support arrangements at additional cost. Depending on the individual animal, prolonged separation and unfamiliar

confinement may also contribute to stress or temporary changes in behaviour and task performance.

These are potential individual impacts and should not be presumed to occur in every case. Assistance dogs may be trained to tolerate separation and unfamiliar environments, but that does not remove the need to assess the effects of a particular quarantine arrangement.

Animal welfare and provider impacts

Quarantine planning should consider the Five Domains of animal welfare: nutrition, physical environment, health, behavioural interactions, and mental state. Relevant arrangements include suitable housing, exercise and enrichment within biosecurity controls, monitoring, and appropriate handling.

Australian providers may need to assist with logistics, client support and post-quarantine reassessment where indicated. Delays or additional costs may affect service capacity. Impacts on prospective program dogs should be considered separately under the general import pathway.

Animal Care Australia recommendation

Home-based quarantine should remain preferred when requirements can be met. Facility-based quarantine should be supported by an individual biosecurity assessment and consideration of feasible alternatives. Decisions should explain the identified risk, controls required and available review mechanisms.

Where facility quarantine is necessary, DAFF should plan disability support and animal welfare arrangements with the handler. Reasonable adjustments should remain available to the extent compatible with effective biosecurity controls.

Training standards and evidence requirements

(Relevant discussion paper question 13)

Animal Care Australia supports clear, consistent evidence requirements that verify training and behaviour without unnecessary duplication. Verification should distinguish assistance animal status, biosecurity compliance, and the suitability of a particular reasonable adjustment; these are related but separate considerations.

Section 9(2) of the Disability Discrimination Act 1992 provides alternative pathways to assistance animal status, including accreditation under relevant state or territory law, accreditation by a prescribed training organisation, or training to assist a person with disability and meet appropriate public hygiene and behaviour standards.

The training pathway does not require international organisational accreditation. [1]

Domestic recognition does not itself waive biosecurity requirements or establish an automatic entitlement to every import adjustment. Animal Care Australia asks DAFF to explain how its revised verification requirements will accommodate the statutory pathways while managing relevant biosecurity and safety risks.

Prescriptive certification through a limited group of organisations could create assessment bottlenecks, additional expense, and travel delays. It could also disadvantage dogs trained for less common disability-related needs or handlers who cannot access metropolitan assessors.

Animal Care Australia recommends evidence of disability-related assistance, relevant public behaviour, hygiene, and health, together with identifiable training and assessment records be considered. Veterinary and welfare documents support import and care requirements but do not, alone, establish assistance animal status. Additional assessment should address identified gaps rather than repeat reliable existing evidence.

Recognition of different training and accreditation pathways

(Relevant discussion paper questions 12 and 13)

Animal Care Australia considers it essential that the framework explicitly accommodate internationally accredited organisations, Australian professional providers, and owner-trained teams. These pathways differ in governance, funding, documentation, and assessment structures, but each can produce appropriately trained dogs. Eligibility should depend on meeting the relevant requirements.

Internationally accredited assistance dog organisations

International accreditation through bodies such as Assistance Dogs International (ADI) and the International Guide Dog Federation (IGDF) can provide organisational assurance. Animal Care Australia acknowledges its value as supporting evidence of training systems, welfare procedures, client services, and ongoing support.

International accreditation is an organisational process and should not become a universal requirement for individual assistance dog recognition. Obtaining and maintaining it may require resources and organisational structures that are difficult for some smaller providers to sustain. DAFF should assess these implications before giving accreditation any exclusive regulatory role.

[1] Disability Discrimination Act 1992, section 9(2), Federal Register of Legislation, compilation dated 1 July 2026

Existing organisational documentation should be recognised where relevant and reliable, subject to proportionate verification. Accreditation should not remove the need to establish that the individual animal meets applicable requirements.

Australian professional assistance dog training organisations

Australian providers include specialist organisations, smaller businesses and independent professionals, some operating outside international accreditation structures. They may maintain training records, public access assessments, welfare procedures, and client support arrangements.

Absence of international accreditation does not, by itself, demonstrate inadequate training. Equally, a general dog training qualification alone does not establish specialist assistance dog competency. Relevant qualifications, specialist experience, assessment capability, and the quality of the animal's evidence should be considered together.

Excluding these providers could reduce consumer choice, restrict specialist services, increase certification costs, and disadvantage regional teams. Animal Care Australia recommends accepting their training and assessment records under transparent criteria that verify professional competence and the individual dog's performance.

Owner trained assistance dogs

Owner training may involve professional support or specialist organisational oversight. It may be relevant where established programs are unavailable, waiting periods are lengthy, geographical access is limited or a handler requires individually tailored assistance.

The quality of owner-training and documentation can vary. That supports proportionate verification, rather than automatic exclusion. Owner-trained dogs should be able to demonstrate disability-related training and appropriate hygiene and public behaviour through reliable evidence.

Requiring certification exclusively through internationally accredited organisations may force handlers to seek assessment from providers that did not train their dog and may not offer assessments of externally trained teams. This could create financial, practical, and geographical barriers.

Animal Care Australia recommends fair, affordable, and accessible independent assessment where evidence gaps require it. Independent reassessment should not automatically be imposed on every owner-trained dog if reliable existing evidence already meets the criteria.

Comparison of training pathways

Consideration	International accreditation	Australian professional providers	Owner trained teams
Structure	Organisational training programs	Professional programs with variable organisational models	Individual training often with professional support
Recognition evidence	Accreditation and individual records	Competence training records and assessments	Training evidence and reliable assessments
Assessment access	Usually within provider systems	Internal or independent assessment	Independent assessment where evidence gaps exist
Potential barrier	Individual evidence may still be needed	Exclusion if international affiliation is mandatory	Cost and access if no alternative pathway exists

Risk of unequal recognition

Two dogs may demonstrate equivalent disability-related training, hygiene and public behaviour but receive different treatment because only one was trained by an internationally accredited organisation. Animal Care Australia considers that any additional requirements should be justified by relevant evidence gaps or risks.

A streamlined process may be appropriate for reliable established records, but an equally accessible route must exist for alternative evidence. Otherwise, the framework could establish a two-tier system in which non-affiliated providers and owner-trained teams face disproportionate costs, delay, or exclusion.

Implications for Australian providers

Providers outside international accreditation structures may feel pressure to obtain accreditation so their clients can travel internationally. This could redirect resources from training and placement to administration and compliance, potentially reducing the diversity and capacity of Australian services.

DAFF should avoid creating market barriers favouring particular private accreditation systems or organisational models without evidence that the restriction is necessary and proportionate.

Recommended verification framework

Animal Care Australia recommends a consistent framework incorporating:

- Evidence of training to provide assistance related to the handler's disability.
- Evidence of safe, appropriate, and reliable behaviour in relevant public environments.
- Appropriate hygiene and health evidence, with welfare and biosecurity requirements addressed separately where necessary.
- Identifiable training records and assessments from competent providers or other reliable sources.
- Independent assessment where evidence is incomplete, regardless of training pathway.
- Recognition of relevant existing assessments and verification limited to unresolved gaps.
- Accessible information, transparent decisions, and affordable review options.

Standards should be developed with accredited and non-accredited providers, independent professionals, registered training organisations, and disability representatives. Verification should minimise collection of sensitive medical information and focus on what is necessary to assess eligibility.

Animal Care Australia formal position

International accreditation should be one valid means of supporting recognition. Australian professional providers should be eligible through evidence of relevant competence and training outcomes. Owner-trained teams should have accessible ways to demonstrate compliance, including independent assessment where required.

No dog should be automatically excluded solely because its trainer lacks international organisational accreditation. All pathways should meet relevant requirements, and additional demands should be proportionate to identified evidence gaps or risks.

Australian training and education providers

Australian vocational education provides relevant animal behaviour and training qualifications. These can support evidence of professional competence but do not automatically establish expertise in assistance dog training, disability-related task design, or public access assessment.

Animal Care Australia recommends consultation with registered training organisations and specialist providers to identify relevant competencies and documentation standards. Recognition should consider qualifications together with demonstrated specialist skills, experience, and assessment quality. This would support professional standards without treating either a general qualification or private accreditation as conclusive proof.

Prevention of misrepresentation and misuse

(Relevant discussion paper questions 12 and 13)

Animal Care Australia supports measures against deliberately misleading claims that companion animals are assistance animals. Misuse can undermine confidence and increase scrutiny of legitimate teams.

Verification should use clear evidence requirements, authentic records, and targeted checks. It should not presume illegitimacy because a disability is not visible, a dog is owner-trained or a provider lacks international affiliation.

Requirements should protect sensitive personal information, avoid unnecessary complexity, and provide accessible review. DAFF should distinguish deliberate misrepresentation from incomplete documentation that can reasonably be clarified or supplemented.

Work health and safety

Animal Care Australia supports safe arrangements for departmental personnel, handlers, and animals. Behavioural expectations and handling plans should address effective control and identifiable safety risks.

Assessment should account for context, including illness, stress, and unfamiliar environments, without overlooking genuine risks. Controls should respond to the individual circumstances and use the least restrictive effective approach compatible with safety and biosecurity.

DAFF should publish behavioural expectations and procedures for managing concerns, including opportunities to provide additional evidence or agree suitable handling arrangements where appropriate.

Cumulative consequences for Australian services

(Relevant discussion paper question 14)

The cumulative effects of fees, verification and quarantine changes may be more significant than each measure considered separately.

Animal Care Australia recommends DAFF assess potential effects on:

- Availability of assistance dogs, including provider capacity and waiting times.
- Diversity of providers and access to disability-specific services.
- International travel and collaboration involving working assistance dog teams.
- Financial pressure on handlers, smaller organisations, and charities.
- Regional and remote access to assessment, advice, and quarantine arrangements.
- Consistency between domestic recognition and import verification.

Consequences for breeding and development imports require separate consideration because those animals may use the general import pathway. DAFF should avoid presenting program imports and handler-accompanying assistance animals as a single category.

Further consultation and impact assessment

The paper is an exploratory consultation and does not present final fee amounts, a detailed evidence framework or settled quarantine criteria. Animal Care Australia therefore cannot quantify costs or determine the effects of final arrangements at this stage.

Before substantive changes, DAFF should publish proposed fees and exemptions, accepted evidence pathways, criteria for alternative quarantine, anticipated provider costs, transitional arrangements, and decision review processes. Clear processing timeframes and accessible guidance would improve predictability for handlers and organisations.

Impact assessment should examine cumulative financial, disability access, welfare, and operational effects. It should include providers within and outside international accreditation structures, owner-trained teams, disability representatives, veterinary professionals and relevant training and welfare bodies.

Existing teams should have reasonable transitional arrangements, and returning Australian handlers should be able to understand recognition and import requirements before travelling. Guidance should also address assistance cats without assuming dog-specific assessment methods apply unchanged.

Formal recommendations

Animal Care Australia recommends that DAFF:

1. Retain and improve existing reasonable adjustments wherever biosecurity risks can be appropriately managed.
2. Reject full fee-for-service arrangements and retain current assistance animal fee exemptions.
3. If partial cost recovery is considered, publish cost modelling and protect essential adjustments and routine processing through appropriate exemptions.
4. Retain home-based quarantine as the preferred arrangement where required controls can be met.
5. Base any facility quarantine requirement on an individual risk assessment, with suitable disability support and welfare arrangements.
6. Explicitly recognise internationally accredited organisations, Australian professional training providers, and owner-trained teams as potential evidence pathways.
7. Avoid exclusive recognition based on membership of a particular international accreditation body.
8. Accept relevant Australian qualifications and specialist experience as supporting evidence, without treating general qualifications as sufficient proof of specialist competence.
9. Provide accessible independent assessment where evidence gaps require it and avoid duplicating reliable existing assessments.
10. Use targeted verification against misrepresentation, with privacy safeguards and proportionate requirements.
11. Publish clear eligibility, evidence, processing, safety, and quarantine guidance, together with decision reasons and accessible review mechanisms.
12. Assess cumulative impacts on smaller providers, charities, regional services, and people with disability before implementation.
13. Separately examine general import barriers affecting legitimate assistance dog breeding and development programs.
14. Consult affected organisations and handlers on detailed proposals and provide reasonable transitional arrangements.

Conclusion

Animal Care Australia supports a modern assistance animal import framework that protects Australia's biosecurity while preserving fair access for people with disability. Its integrity should be strengthened through clear evidence requirements and proportionate verification.

Animal Care Australia's central concern is the potential for implementation choices to increase costs, restrict legitimate training pathways and reduce the capacity or diversity of Australian assistance dog services. These risks require assessment before final requirements are settled.

Internationally accredited organisations, Australian professional providers, and owner-trained teams should each have a fair opportunity to demonstrate that their animals meet relevant requirements. Recognition should be grounded in reliable evidence of the individual animal's training and behaviour, alongside applicable health and biosecurity controls.

Animal Care Australia welcomes further consultation on detailed proposals and recommends that substantive changes proceed only after their financial, operational, disability access and welfare consequences have been assessed.

This submission can be published in full on the website including the signatory's name.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia