

25th September 2026

Greater Shepparton City Council

Email: council@shepparton.vic.gov.au

Re: 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.

Even before looking at the draft DAMP, the only option given to residents or stakeholders to provide feedback is via an online survey, that also says will only take 5 – 10 minutes to complete.

Animal Care Australia DOES NOT SUPPORT the single use of surveys as a means of 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 irresponsible statistical analysis, regardless of how well structured a survey may be.

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.

The actual draft DAMP itself is accessed by a link over to the right of the survey. Animal Care Australia is unsure how many people would actually read it before doing the survey, especially given the document is 36 pages long.

This submission reviews Greater Shepparton City Council’s Draft Domestic Animal Management Plan (DAMP) 2026–2029 and considers the principal changes in direction from the previous Domestic Animal Management Plan 2022–2025.

Particular consideration has been given to:

- animal ownership limits
- excess animal permits
- dog and cat breeding
- Domestic Animal Businesses
- registration and identification
- enforcement
- cat management
- dog management
- animal shelter and euthanasia policy
- responsible pet ownership, and
- the potential impact of the proposed plan on responsible pet owners and breeders

Key Changes at a Glance

Issue	2022–2025 Direction	Draft 2026–2029 Direction
Private-property dog/cat limits	Existing Local Law applied	No identified change to limits
Excess animal permits	Existing permit system	Continued, with greater monitoring/enforcement
Breeders	Compliance with legislation	More proactive identification and monitoring
>3 fertile females	Legislative requirements applied	Council database monitoring specifically proposed
Online breeder advertising	General compliance	Active internet/media/PER auditing proposed
Registration	Declining registrations identified	“Stop the Drop” strategy and incentives
Microchipping	Existing requirement/education	Possible low-cost microchipping program
Registration tags	Existing system	Lifetime tags to be investigated
Desexing	Further initiatives considered	Formal low/free-cost scheme feasibility study
Cats	Curfew, trapping, desexing	Increased trapping, confinement, and desexing activity

Issue	2022–2025 Direction	Draft 2026–2029 Direction
Enforcement	Education and enforcement	Greater emphasis on proactive infringements
Domestic Animal Businesses	Registration/auditing	Expanded proactive identification and auditing
Shelter	Review/new facility investigation	Improvements, adoption, and alternative placement pathways
Off-leash parks	Third location considered	Future off-leash facilities to be investigated
Public-place dog limit	Existing 2-dog rule	No identified change – existing rule retained

Overall Direction of the New Plan

The 2026–2029 DAMP represents an evolution of Council’s previous approach rather than a complete change in animal management policy.

The 2022–2025 DAMP identified several significant priorities, including:

- wandering cats and impacts on wildlife
- dog attacks
- animal welfare
- dog faeces in public areas
- dogs wandering in parks and gardens
- declining animal registrations
- consideration of a new animal shelter
- increasing animal adoption, and
- improving the accessibility and operation of the Shepparton Animal Shelter

The 2026–2029 draft retains many of these priorities but places noticeably greater emphasis on:

compliance, registration, proactive enforcement, monitoring breeding activity, excess animals and identifying potentially unregistered Domestic Animal Businesses.

Council reports that during the previous four-year period its Animal Management Team dealt with approximately 9,700 animal-related requests and admitted more than 7,600 animals to the Shepparton Animal Shelter.

Feedback on specific aspects of the Domestic Animal Management Plan.

Authorised Officer Training:

Animal Care Australia acknowledges the organisational chart showing the hierarchy of the Animal Management team but does not indicate how many actual officers are employed in each role. It is therefore impossible to determine if staffing levels are adequate to administer or enforce the actions set out.

Additionally, the training plan is vague. There are mentions of “skills matrix” and recording completion of training, etc., but there is no inclusion or notable outline of what that training consists of or who within the team needs it or has completed it. At the very least a Cert IV in Government (Investigations), a Cert II or III (or higher) in Companion Animal Care Management, certification in Handling Dangerous Dogs, etc. should be listed as training goals for any officer undertaking enforcement or animal care/management roles.

Promote responsible pet ownership:

Animal Care Australia commends Council on a very comprehensive Pet/Animal section on Council’s website. Information is easy to find and can be translated into multiple languages without leaving the site.

DAMP goals/actions include:

- **Develop engaging web content**

As mentioned above, Council’s web site pages on pet ownership provide great information.

Any reliance on social media should consider that social media may not reach the intended audience. Algorithms tend to only present material from regular interaction with pages therefore, if residents do not follow Council’s social media pages and engage with that content regularly, that information does not get presented to them as the algorithm only feeds users topics/pages with which they have recently engaged.

Animal Care Australia acknowledges the physical educational event per year and hopes Council could investigate further opportunities for more public face-to-face engagement.

One particular opportunity to utilise are for the regular patrols to educate rather than solely enforce/prosecute offences. Friendly interactions advising residents about their obligations promote council as proactive participants in the sector, rather than just enforcers.

- **Study feasibility of offering free or low-cost desexing.**

The 2022–2025 DAMP already identified further desexing programs and initiatives as an area for investigation.

The new plan goes further by proposing a formal feasibility study for a free or low-cost desexing program. Animal Care Australia questions why Council is wasting time and money doing a study that has been done multiple times in multiple other similar jurisdictions? A quick check on similar studies in those other jurisdictions will quickly highlight the benefits of offering free or low-cost desexing and how it greatly improves the number of animals that are desexed and then registered with Council. Combine that with free or low-cost microchipping, and you only further increase registration compliance.

Overpopulation and high euthanasia rates:

Animal Care Australia notes and applauds the great adoption rates direct from Shepparton Animal Shelter for dogs and cats.

The 2026–2029 plan records substantial operational improvements already achieved, including:

- building and equipment upgrades

- improved disease control
- improved animal comfort
- new shelter management software
- increased adoption
- reduced euthanasia and
- a feasibility study concerning a new shelter facility

Noting the difficulty in transferring cats, Animal Care Australia supports Councils proposal to establish further agreements with external organisations under section 84Y, in order to transfer animals where another organisation may be better equipped to deal with particular behavioural, veterinary, or breed-specific requirements.

Animal Care Australia recommends reporting of cat euthanasia rates could be broken down further to denote exactly how many suitable for re-homing cats are included, as opposed to unsocial stray/community/feral cats that are euthanised due to being too dangerous to house or rehome.

Animal Care Australia is concerned by the mandatory desexing of pet cats before they can be registered. Council actively rejecting registrations from owners who have not desexed their cats leads to greater issues, including higher non-registration numbers, greater likelihood of unwanted kittens and subsequently greater numbers of stray/feral cats. Council should be running programs that partner with residents to help them get their cats desexed, microchipped, and registered wherever possible, rather than simply banning or rejecting them outright.

Registration and microchipping:

Animal Care Australia notes the mention of increased fees applied by the government. However, only \$9 from registration fees goes to the State government – so we fail to see why that item required a mention as some sort of major issue.

With that said, Councils registration fees are too high, especially as they are annually renewed and increase annually at CPI rate also. Reduction in registration fees may see greater uptake by residents, particularly those having financial difficulty.

Again, Council (Animal Shelter) should implement regular free or low-cost microchipping days for local residents. If paired with free or low-cost desexing drives at regular intervals (grants can be sought from State to cover expenses), registration uptake will increase.

One of the clearest problems identified in the new DAMP is declining animal registration.

Registered dogs have fallen from:

8,297 in 2021/22 to 6,712 in 2024/25.

Registered cats have changed from:

2,501 in 2021/22 to 2,437 in 2024/25.

The decline in dog registration is particularly substantial.

Animal Care Australia supports and applauds Councils new “Stop the Drop” style registration initiative. Actions include:

- annual analysis of registration and microchip data

- reviewing registration fees
- considering incentives for long-term compliant owners
- providing online registration/payment options
- increased community education
- working with veterinarians and Domestic Animal Businesses
- discounted shelter release fees for registered animals
- investigating lifetime registration tags
- considering low-cost microchipping and
- providing registration information in multiple languages.

These measures represent a stronger strategic emphasis on reversing falling registration numbers.

Number restrictions and excess animal permits:

While Animal Care Australia acknowledges that Domestic animal Management Plans should only be focused on dogs and cats, the Domestic Animal Management Plan does not itself establish the maximum number of dogs or cats permitted on private property.

Those restrictions currently arise under Greater Shepparton City Council’s Community Living Local Law No. 1, 2018. This means that a resident must know where to find these restrictions.

The existing limits are:

Property type	Dogs without permit	Cats without permit
Flat, unit, or townhouse	2	2
Residential or commercial land	2	2
Farming Zone under 2 hectares	4	4
Land over 2 hectares	Subject to applicable Planning Scheme requirements	Subject to applicable Planning Scheme requirements

Accordingly, a resident wanting to keep more than the prescribed number must obtain an Excess Animals/Keeping of Animals Permit.

The Council’s current (website) information expressly states that keeping more than two dogs or two cats on residential or commercial property, or more than four dogs or four cats on farming-zoned land below two hectares, requires a permit.

While there is no apparent reduction in the number of dogs or cats a person may keep without a permit between the previous DAMP and the proposed 2026–2029 DAMP, the underlying animal-number restrictions remain those established under the 2018 Local Law.

However, there is an important change in how Council proposes to identify and investigate properties with larger numbers of animals.

There is an increased Focus on “Excess Animals.”

The new DAMP contains considerably more explicit compliance activity concerning excess animals.

Council's own data shows an increase in complaints/requests concerning excess animals.

Recorded Excess requests:

For dogs:

- 2020/21 – 35
- 2021/22 – 28
- 2022/23 – 35
- 2023/24 – 22
- 2024/25 – 41

For cats:

- 2020/21 – 27
- 2021/22 – 30
- 2022/23 – 26
- 2023/24 – 15
- 2024/25 – 32

This appears to have influenced the increased compliance focus in the new DAMP.

The draft specifically proposes Animal Rangers:

- **inspect properties with excess animals for compliance with Local Laws and breeding legislation.**

This is an important provision for breeders and owners of multiple animals.

This raises a major concern. The distinction needs to remain clear between:

1. an owner lawfully keeping several animals under an approved Council permit
2. a recreational or registered breeder
3. an Applicable Organisation member operating within relevant exemptions
4. a person who meets the statutory definition of Domestic Animal Business and
5. genuinely unlawful breeding or animal-hoarding situations.

Simply owning multiple dogs or cats should not automatically be treated as evidence of unlawful breeding or a Domestic Animal Business.

Local Laws dictating number caps on animals is not supported by Animal Care Australia especially when they increase the likelihood of poorer animal welfare outcomes. For the purpose of enforcement any caps or limits should only be applied to residents who are not providing the appropriate care and welfare for their animals. Meaning they are to be used only when compliance needs to be enforced for breaches in identified animal welfare or amenity issues. Currently the provision of excess animal permits indicates that such limits need not apply, so they just look like a “money grab” exercise by Council and have zero to do with improving amenity or animal welfare.

Increased Monitoring of Breeders

One of the most significant additions to the 2026–2029 plan is Council's proposed monitoring of breeding activity.

Under Objective 9.2, Council proposes to:

- monitor Council's registration database for owners with more than three fertile females.

The plan also proposes audits of the Pet Exchange Register and searches of websites and advertisements to identify people who may be keeping more than three entire females or breeding and selling dogs or cats.

Council intends to conduct internet, media and newspaper searches to identify potentially unregistered Domestic Animal Businesses.

This represents a more proactive intelligence and compliance approach than simply responding to complaints.

- **Domestic Animal Businesses**

The new plan contains a particularly strong compliance program for Domestic Animal Businesses.

Council proposes to:

- inspect and audit all registered Domestic Animal Businesses annually
- ensure permits are renewed
- identify businesses which should be registered
- monitor registration data
- inspect excess-animal properties
- monitor breeding legislation compliance
- audit the Pet Exchange Register
- search internet advertisements
- develop procedures for VCAT matters and prosecutions and
- work with Council's planning department to ensure planning compliance.

This is one of the areas in which the 2026–2029 plan demonstrates a stronger proactive regulatory approach. Animal Care Australia supports this, however, there is a concern that 'shortcuts' may become a part of the enforcement activities if numbers of fully trained officers are not maintained.

- **Industry consideration**

This area warrants careful oversight.

Possession of entire animals does not, by itself, establish that someone is unlawfully breeding animals or operating an unregistered Domestic Animal Business. Council officers will need to correctly apply the Domestic Animals Act and recognise the different legal circumstances applying to:

- Applicable Organisation members
- registered breeders
- recreational breeders
- Domestic Animal Businesses
- animals retained for showing or competition
- animals retained for future breeding
- retired breeding animals and
- multi-dog households not involved in commercial breeding.

Council's compliance activity should therefore remain evidence-based and proportionate.

Increased Enforcement Activity

The 2026–2029 plan contains a stronger enforcement focus. Council states that this is intended to act as a deterrent against more serious offences such as dog attacks.

Council's figures show total dog and cat infringements increasing from 19 in 2021/22 to 102 in 2024/25. The new DAMP therefore appears to move toward a more active compliance model combining:

education + proactive monitoring + infringement + prosecution.

This is a notable change in emphasis, and Animal Care Australia is cautious in supporting such a change if the measures are simply used to increase income and do not include the proposed education aspects. Time will tell.

- **Dogs in Public Places – Two-Dog Restriction**

Animal Care Australia notes there is another numerical restriction worth distinguishing from private-property ownership limits.

Under Council's existing order made under section 26(2) of the Domestic Animals Act, a person must not have more than two dogs under their apparent control at any one time in a Public Place or Designated Area, whether those dogs are on or off leash.

The draft 2026–2029 DAMP reproduces this existing order. Therefore, this should not be described as a new 2026 restriction. It is an existing requirement originating from Council's 2021 Order.

This distinction is particularly important for professional dog walkers, trainers, handlers, and people exercising several dogs.

- **Cat Management**

Animal Care Australia acknowledges and supports Greater Shepparton Council's existing 24-hour cat curfew - meaning cats are prohibited from being at large outside their owner's premises at any time.

Council also requires cats to be desexed before registration unless an exemption applies. Note: Animal Care Australia has concerns with this as outlined above in 'Registration and Microchipping.'

The new DAMP proposes further measures including:

- purchasing additional cat traps
- reviewing cat trespass procedures
- continuing confinement education
- increasing desexing initiatives
- considering free or low-cost desexing
- increasing adoption and transfer opportunities and
- reducing euthanasia.

This continues the direction of the previous DAMP but provides a more structured set of measurable actions.

Nuisance:

- **Dog Attacks and Wandering Dogs**

Dog attacks continue to be an area of concern. Council recorded 108 dog attack reports in 2024/25, compared with 75 in 2022/23.

Dog rush reports also increased to 48 in 2024/25.

Animal Care Australia notes the reporting of roaming or at-large dogs and cats appears incomplete. Where is the breakdown of whether these animals are lost, owned, or abandoned?

- **Barking dogs**

Bored dogs bark. There are only 2 designated off-leash areas provided for at least 6712 registered dogs in the LGA, and both of those areas are located in Shepparton township. This is insufficient. The previous DAMP specifically contemplated consideration of a third off-leash area outside Shepparton.

The new plan continues the issue more generally through an action to:

- investigate future off-leash dog parks in Year 2 and implement the findings.

This therefore appears to be a continuation rather than an entirely new policy.

Animal Care Australia strongly recommends improved education BEFORE enforcement will get better results when addressing compliance issues.

Clarifications and Recommendations

While the draft does not appear to reduce private animal ownership limits, several aspects would benefit from clarification before being implemented.

Excess animal permits

Council should confirm that there is no proposal through the DAMP or any associated Local Law review to reduce existing animal-number limits or restrict existing excess-animal permit holders.

Breeder monitoring

Council should clearly explain how registration-database monitoring for households with more than three fertile females will distinguish legitimate breeders and Applicable Organisation members from persons potentially operating illegally.

Procedural fairness

Proactive monitoring should not result in owners being presumed to operate a Domestic Animal Business simply because several entire animals are registered at an address.

Excess animals versus animal welfare

The DAMP should maintain a clear distinction between the number of animals kept and the welfare conditions in which those animals are kept.

A well-managed property containing multiple healthy animals should not automatically be treated in the same manner as an animal-hoarding or welfare case.

Animal welfare is NOT about numbers – it is about the conditions, behaviour, cleanliness, housing, and husbandry that each animal is kept in by the owners – your residents.

Permit decision-making

Council should provide transparent criteria for granting, renewing, refusing, or cancelling excess-animal permits. Decisions should consider:

- available property space
- housing and fencing
- animal welfare
- noise
- demonstrated responsible ownership
- history of complaints
- registration compliance and
- genuine impact on neighbouring properties.

The numerical number of animals alone should not determine whether a property is appropriately managed. Policies that restrict the keeping of animals based purely on preventing noise, odour or other issues for neighbours are strongly discouraged. Laws are already in place to deal with neighbourhood nuisance issues including matters due to poor animal keeping practices. Restrictions including permit requirements inflict an unnecessary compliance burden on residents and staff which only discourages animal keeping needlessly.

Conclusion

For responsible owners and breeders, the principal issue for consultation should not necessarily be opposition to the DAMP's objectives, but ensuring that increased enforcement is proportionate, evidence-based and distinguishes responsible multi-animal ownership and legitimate breeding from unlawful commercial breeding, nuisance, and genuine animal-welfare problems.

It would also be appropriate for Council to expressly confirm during consultation that adoption of the 2026–2029 DAMP does not alter existing animal-number entitlements or retrospectively affect existing excess-animal permits, unless Council separately undertakes the required process to amend its Local Law or other applicable regulatory instrument.

Animal Care Australia strongly encourages all councils to promote and encourage the keeping of animals as pets as they provide extraordinary mental health benefits for all of us. Any restrictions only serve as a detriment to pets and those wishing to keep them.

Animal Care Australia does not agree with imposing blanket limits on numbers of animals that can be kept especially when based solely on ideological theories as these theories are animal rights based. Animal restrictions for many species create animal welfare concerns.

Animal Care Australia would welcome the opportunity to consult with Council as an animal organisation (in this case a national animal welfare organisation) on all aspects of your Animal Management and in particular educational material promoting and encouraging responsible pet ownership.

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

President

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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