

1<sup>st</sup> May 2024

Mount Barker District Council  
Manager Health and Public Safety  
E: yoursay@mountbarker.sa.gov.au

**RE: Review of the Draft Animal Management Plan 2023-2028**

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 is currently recognised by the Department of Agriculture, Forestry and Fisheries and the Dog and Cat Management Board as a key stakeholder in the ongoing review of South Australia’s Animal Welfare Act 1985, Dog & Cat Management Acts, and the associated regulations. Animal Care Australia is directly consulting and advising throughout the reviews, including any 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.

It is pleasing to see Council acknowledging the health benefits that dogs and cats can bring. We remind Council that this also applies to ALL pets and not just dogs and cats. 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.

Animal Care Australia also commends Council on your approach and policy of educating your residents about responsible pet ownership.

Animal Care Australia commends Council for participating in the National De-sexing Network (NDN) for low-income earners to receive subsidised desexing of their animals.

Animal Care Australia provides the following feedback in relation to the Draft Animal Management Plan 2023-2028:

**Council By-laws (Page 12):**

Animal Care Australia draws your attention to the appearance of a bias against cat ownership. The keeping of excess dogs is stated in your document as requiring a permit to do so. However, no such statement accompanies the restriction of just two cats. Animal Care Australia does note that Council does permit more than two cats via a Cat Dispensation Form AND that an approved cattery may be sought under a Development Application – however this process was extremely difficult to find and required some searching.

While Animal Care Australia DOES NOT SUPPORT the restriction of numbers on the keeping of any pet – we do acknowledge legislative requirements place permit requirements on Council and therefore your residents. Animal Care Australia is pleased to see conditions such as sanitary requirements, or that excess cats are all desexed, is being utilised to permit additional cats and dogs. More legally owned and registered cats also translates to more funding for Council through registration fees.

It is also important that consideration is provided by Council for fostering of cats and dogs which currently do not appear to fit within the permanency requirements of the permit system. Currently animals cannot be replaced by new animals following a departure. This is restrictive on fostering. Fostering is vital when shelters and rescues become over-crowded or when an animal needs some extra attention prior to being re-homed.

### **Impound Service (page 12)**

Animal Care Australia notes the requirement of lost dogs to be held for only 72 hours (under the Act) while cats must be held for 7 days. We acknowledge the Act provides for these requirements however we would strongly argue 72 hours is insufficient time for owners who have been hospitalised and are therefore uncontactable to be provided by Council with the same provision as cat owners are. We would hope that Council would see this as vital in ensuring all pets make their way back to their owners. Another important aspect is that microchips fail – and it may take owners more than 72 hours to identify their animal is indeed missing, and organise for someone to visit Council shelters, rescues etc before their animals are re-homed.

The CRMS table on Page 19 highlights the relatively low numbers of dogs being impounded, so there should be room to increase the impound holding period to 7 days to align with the holding period for cats.

Animal Care Australia is aware of incorrect rehoming of pets and the subsequent battles, stresses, and unnecessary heartbreak due to animals (dogs in particular) not being held for a sufficient time. We trust Council will take a look at your policy in this regard.

### **Responsible Pet Ownership (page 26)**

*“Council also recognises the importance of working with other stakeholders such as qualified dog trainers, veterinarians, and animal organisations in educating current and prospective pet owners and the broader community on responsible pet ownership.”*

Animal Care Australia commends this action, and we welcome the opportunity to consult with Council as an animal organisation (in this case a national animal welfare organisation)

This section also lists the ways Council will disseminate ‘education’ on pet ownership. Animal Care Australia notes this is limited to Council’s website and social media posts, which in our opinion is not sufficient.

Council should implement printed material for mailbox delivery at regular intervals during the year. Proactive delivery to the residents, rather than expecting them to go looking for it themselves is the most effective approach to ensuring everyone understands their responsibilities.

### **Council Parks, Reserves and Open Spaces (page 30)**

Animal Care Australia draws your attention to the fact this entire section refers to dogs only. This is insufficient. With Council having introduced ‘cat containment’ by-laws there needs to be provision for areas for cat owners to safely walk and exercise their cats under the same provisions applying to dogs ie on leads, harness etc.

### **Impounding of cats and dogs (page 31)**

Animal Care Australia strongly supports Council moving away from any reliance on the RSPCA.

### **Cat Management (page 33)**

Animal Care Australia supports a 24/7 cat containment law.

Animal Care Australia supports cat containment that requires cats to remain on their owner's property at all times as curfews have limited impact on the issues relating to roaming cats unless it is a 24/7 containment.

However, there are some items that need serious consideration and any changes to local animal management laws should provide an avenue for greater consultation and feedback.

- Cats that have been allowed to roam need time to adjust to be confined and it may have detrimental welfare impacts if the cat is not allowed time to become accustomed to the changes.
- Costs of installing cat runs or other methods are expensive, and this should be taken into consideration in the current cost of living crisis.
- Council should provide assistance for cat owners wishing to construct or instal appropriate containment enclosures. Councils should recognise the need to consult with all residents in their catchment area and to provide assistance with approval processes for the construction of enclosures etc.
- As previously stated, cats will require the ability to be exercised off of their property. Provisions to permit the walking of cats and open spaces for the exercising of cats must be implemented and this can be done in the same manner as for dogs.

Animal Care Australia welcomes the opportunity to consult with you and look forward to hearing from you in the near future.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive, flowing style.

Michael Donnelly  
President  
0400 323 843

## **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