

15 March 2024

Engage Victoria Consultations
Department of Energy, Environment and Climate Action
Consultation on draft Animal Care and Protection Bill



To Whom It May Concern,

Submission in response to the draft Animal Care and Protection Bill

Thank you for the opportunity to make a submission in response to the draft Animal Care and Protection Bill.

The Lost Dogs' Home (LDH) is one of the largest animal shelters in Victoria, caring for around 18,000 animals, mostly cats and dogs, every year. Our vision is to give animals the best chance of a happy and healthy life. This means providing the highest standard of care for the animals that come to us.

The LDH has three areas of concern with the draft Bill:

- The Animal Care and Protection Fund.
- The care requirements for animals.
- Animal sentience.

Animal Care and Protection Fund

Part 15 Miscellaneous, of the draft Animal Care and Protection Bill establishes a new Animal Care Protection Fund. This fund replaces the Animal Welfare Fund currently established under the *Domestic Animals Act 1994*.

The LDH is concerned about the wording of the first two parts of the definition for eligibility for grants funding, which is as follows:

- Supports improvements to animal welfare; or
- Aims to raise community awareness of animal welfare.

The LDH believes that this wording is too broad and does not reflect the important work that shelters and pounds, and animal rescue organisations undertake across Victoria. It will further lead to greater competition for the limited funding available.

Competition for the funding in the current Animal Welfare Grants Fund is fierce. A voluntary rescue organisation caring for 100 animals annually can apply for equal funding to an organisation like the LDH, which is caring for 18,000+ animals.

In 2023, the LDH spent approximately \$14.3 million on animal welfare and veterinary expenses compared to \$11.8 million in 2022.

The LDH does not receive any direct government funding and relies on being successful during grant rounds to provide for vital and essential equipment, infrastructure upgrades and key programs such as desexing.

All our animals are desexed before rehoming. Since the inception of the grants program in 2012, the LDH has admitted around 218,000 cats and dogs into its shelters. During this same period, the grants programs has made available around \$150,000 annually to provide for desexing initiatives across the whole of the rehoming sector.

The Animal Welfare Fund is also critical for funding education programs and community foster care networks for cats and dogs.

Education programs are important for maintaining the human animal bond and reducing surrender rates for animals to shelter and pounds. They include the importance of microchipping pets, animal behaviour training programs for dogs, the importance of cats being indoors and building cat shelters.

Community foster care networks and rescue groups are essential in reducing the number of animals located in pounds and shelters. The process of rehabilitating and rehoming dogs and cats can be greatly assisted by these groups.

The LDH believes that the new definition in the draft bill should include three sections from the previous definition for the Animal Welfare Fund, contained in the *Domestic Animals Act 1994*:

- Provides an animal shelter.
- Provides education on the responsible ownership of animals.
- Provides a community foster care network in respect of cats and dogs.

Including this wording in the draft Bill, will reflect the vital work that shelters and pounds and rescue organisations undertake and limit the competition for the limited funding available.

As part of the inclusion of the Animal Care Protection Fund in the draft Bill, Animal Welfare Victoria should undertake a review of the fund to provide better targeted funding.

The recent Round 11 Animal Welfare Grants Fund grants provided the opportunity for animal welfare organisations to apply for larger grants of \$200,000 for the low-cost veterinary clinic and \$100,000 for rehoming pets. For larger animal welfare organisations, such as the LDH, larger grants provide an important source of potential funding to meet our veterinary services and equipment requirements.

Care Requirements for Animals

Part 3 of the draft Bill outlines the care requirements for animals including nutrition, physical environment, health and behavioural interactions.

The LDH believes that the care requirements should be based on the Five Domains Model for animal welfare, which also has a focus on mental health.

The mental health of animals is fundamental to their welfare. In the Five Domains Model, mental health significantly influences the other four domains. It covers negative and positive experiences of mental health such as pain, fear and distress as well as safety, security, affection and contentment.

Basing the care requirements on the five domains model will allow for a comprehensive approach to animal welfare in the draft Bill.

Principle of sentience

Animal sentience is outlined at Principle 6 of the draft Bill. This states that:

- to subjectively perceive their environments; and
- to experience positive and negative physical and mental state.

The LDH supports the recognition of animal sentience in the draft Bill. However, we believe that a reference to sentience should also be included in the Definition and the Objects sections. This will assist in interpreting what constitutes cruelty and give a greater understanding of its impact on animal welfare.

Summary of Recommendations

- Include three key sections from the previous definition of the Animal Welfare Fund contained in the Domestic Animals Act:
 - Provides an animal shelter.
 - Provides education on the responsible ownership of animals.
 - Provides a community foster care network in respect of cats and dogs.
- Use the Five Domains Model as the basis for the definition of Care Requirements for Animals.
- Include a reference to sentience in the Definition and Objects sections of the draft Bill.

If you require further information about our submission, please contact our Advocacy and Policy Manager, Malcolm Roberts-Palmer at: Malcolm.Palmer@dogshome.com

Yours sincerely



Grant Robb
CEO