



**Animal
Justice
Party**

ANIMALS. PEOPLE. PLANET.

Submission - Domestic Animals Regulations 2025

August 2025



About the Animal Justice Party

The Animal Justice Party (AJP) is a political party established in 2009 to secure the interests of animals and nature through Australia's democratic institutions of government.

Our vision is a planet on which animals and nature have the right to live and thrive free from negative human interference, and a human society which functions with kindness and compassion within its ecological limits as a responsible member of the Earth community. The AJP seeks to foster respect, kindness, and compassion towards all species particularly in the way governments design and deliver initiatives, and the manner in which these initiatives function.

AJP has three elected representatives in the Australia's State Parliaments;

- Emma Hurst MLC, Legislative Council of NSW
- Georgie Purcell MLC, Legislative Council of VIC
- Amanda Dorn MLC, Legislative Council of WA

This submission was prepared by Ben Schultz, Victorian State Manager on behalf of the AJP.



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Submission to the Domestic Animals Regulations 2025 consultation

Introduction

The Animal Justice Party (AJP) welcomes the opportunity to contribute to the consultation on the Domestic Animals Regulations 2025. While the Department's preferred option is to remake the existing regulations with minor administrative updates, we believe this process provides a vital opportunity to go further. The current framework, although functional in some areas, contains entrenched weaknesses that allow animal suffering and overpopulation to persist. These weaknesses undermine the stated purpose of the Domestic Animals Act 1994 which is to promote animal welfare, responsible ownership, and community safety.

By taking this opportunity to strengthen standards, improve enforcement, and enhance transparency, the Victorian Government can move beyond simply maintaining the status quo. AJP argues that this review must not be limited to administrative clarity or incremental changes. Instead, it should deliver meaningful reforms that prioritise animal welfare outcomes, reduce the systemic drivers of overbreeding and abandonment, and restore public confidence that our regulatory system genuinely protects animals.

A review of this scale occurs once a decade, and it must be used to embed best practice protections rather than locking in the status quo.

1. Commercial Dog Breeding Standards, Licensing, and Limits

The current framework permits large-scale breeding operations of up to 50 fertile females, which creates significant welfare concerns. Weak standards and limited enforcement enable poor practices to persist. In practice, the size of these breeding businesses allows animals to be treated more as commodities than as companions, with welfare needs often taking a back seat to commercial output. While breeders are required to meet certain minimum care requirements, inspections are infrequent, predictable, and under-resourced, meaning systemic problems frequently go undetected or unaddressed.

Furthermore, the absence of strong, enforceable welfare standards within breeding facilities has led to situations where dogs are housed in barren environments, deprived of enrichment, and kept breeding far beyond a healthy reproductive lifespan. The result is a regulatory system that in effect permits high-volume operations that prioritise commercial output over animal welfare.

If Victoria is to lead on animal welfare, it must set standards that reflect community expectations that animals deserve meaningful care, socialisation, and respect throughout their lives, not simply the bare minimum for compliance.

Recommendations:

- Lowering the cap on fertile breeding females to significantly reduce high-volume operations.
- Mandating enrichment, socialisation, exercise, and handling standards for breeding animals.
- Introducing shorter breeding age limits and enforceable retirement protocols.
- Requiring breeders to demonstrate higher qualifications and ongoing animal care knowledge.
- Enforcing more frequent, unannounced inspections, with results made publicly available.
- Strengthening source number integrity and auditing to prevent misuse and sham registrations.
- Closing loopholes in unregulated sales channels, including online platforms.

2. Breeding, Sale, and Overpopulation Prevention

Overpopulation remains a systemic issue, leading to overcrowded shelters and unnecessary euthanasia. Current regulations do not go far enough to prevent uncontrolled breeding and unregulated sales of animals. Despite improvements in community awareness and adoption, thousands of animals are still abandoned or surrendered each year due to unplanned litters and irresponsible sales practices. Shelters and pounds are placed under immense strain, and too often this leads to the euthanasia of healthy animals who simply have nowhere to go.

The regulatory framework continues to allow animals to be bred, transferred, and sold with limited oversight. Without mandatory desexing requirements, transparent records, or sufficient restrictions on pet shop sourcing, irresponsible practices flourish. Online sales channels in particular remain a weak point, enabling unlicensed breeders to operate outside regulatory reach. Stronger, more consistent measures are essential to stem the flow of animals into an already overburdened system and to ensure that breeding and sales are conducted responsibly, transparently, and with animal welfare at the forefront.

Recommendations:

- Introducing mandatory desexing at point of sale or adoption, with limited medical exemptions.
- Restricting pet shops to rehoming only rescue or shelter animals.
- Banning the supply of animals from unlicensed breeders.
- Requiring transparent records of breeding history, health checks, and transfers.
- Enhancing council powers and resourcing to enforce breeding, sales, and advertising compliance.

3. Dangerous Dog and Restricted Breed Management

Victoria continues to rely on breed-specific legislation which unfairly targets certain types of dogs while ignoring the fact that behaviour is the true indicator of risk. Evidence from both Australia and overseas shows that breed-specific laws do little to improve community safety and instead perpetuate stigma. The result is that many dogs are treated as dangerous simply because of their appearance, while others that may pose a genuine risk are overlooked. This approach undermines fairness and fails to improve community safety or meet contemporary expectations of fairness.

In addition to being ineffective, the current framework often results in poor welfare outcomes. Dogs declared as dangerous are confined under conditions that prioritise containment without considering enrichment, exercise, or socialisation. This not only harms the animal but can also increase the risk of problem behaviours. A more balanced approach would involve behaviour-based assessments, mandatory owner education, and pathways for reassessment. Such reforms would improve both community safety and animal welfare while restoring confidence in the system.

Recommendations:

- Phasing out breed-specific restrictions in favour of behaviour-based assessments.
- Ensuring humane care, enrichment, and exercise for all confined dogs.
- Requiring mandatory owner training and education for high-risk dog ownership.
- Establishing clear, fair reassessment pathways for declared dogs.

4. Companion Animal Identification and Reunification

While microchipping is mandatory, the current system remains fragmented and inconsistent. Multiple registries exist, each with different standards, and data is often out of date. This creates confusion for owners, shelters, and councils, and significantly reduces the chance of a lost animal being quickly reunited with its family. Too often, animals end up in shelters even when they are microchipped because contact details are outdated or difficult to access. This undermines one of the most important tools available for responsible pet ownership and animal welfare.

The public is also often confused about the difference between council registration and microchipping, leading to poor compliance in both areas. Education campaigns are urgently needed to explain these requirements. At the same time, systemic reform is required. A centralised, state-managed registry with real-time updating would ensure that ownership changes are tracked accurately. Stronger obligations on implanters and better integration across jurisdictions would deliver a system that is reliable, transparent, and effective at reducing unnecessary impoundment and euthanasia.

Recommendations:

- Mandating real-time updates to registry data when ownership changes.
- Creating a centralised, state-managed, and fully integrated database for all registries.
- Strengthening obligations on authorised microchip implanters to verify ownership.
- Streamlining lost-and-found processes to speed reunification.
- Running public education campaigns clarifying registration versus microchipping.

5. Cat Management and Protection for Wildlife

Cats are one of the most significant animal management challenges in Victoria. Unowned and roaming cats contribute to overpopulation in shelters, poor welfare outcomes for the cats themselves, and ongoing impacts on native wildlife. Current regulations make it difficult for councils and community groups to trial humane, non-lethal programs such as Trap Neuter Return, despite clear evidence of their success in reducing stray populations over time. Without these tools, many councils resort to lethal control measures which are both often unpopular with communities and of limited effectiveness as a long-term solution.

At the same time, owned cats are often allowed to roam freely, creating risks for wildlife and for the cats themselves. Stronger containment rules, phased in with support and education, would improve welfare by reducing the risks of traffic injuries, disease, and predation. Accessible desexing programs are also essential, particularly for low-income households. Without this support, many people who would otherwise comply cannot afford the upfront costs. A strategic, humane, and well-resourced approach is needed to address cat management in a way that benefits both cats and wildlife.

Recommendations:

- Expanding and supporting Trap Neuter Return and other non-lethal programs for unowned cats.
- Making exemptions for TNR trials easier to obtain for councils and community groups.
- Supporting phased introduction of 24-hour containment rules with education and subsidies.
- Ensuring affordable desexing programs are accessible to all socio-economic groups.
- Encouraging councils to integrate cat welfare objectives with wildlife protection strategies

6. Greyhound Leash Laws

Greyhounds remain unfairly singled out under Victorian law which requires them to remain on-lead in all public places, including designated off-leash areas. This blanket rule is based on outdated perceptions rather than contemporary evidence. Research consistently shows that greyhounds are among the least aggressive breeds toward both people and other dogs. Yet despite their gentle nature, they are denied the same freedoms afforded to other breeds. This exclusion not only disadvantages greyhounds but also the people who adopt and care for them.

The welfare impacts of this law are serious. Denying greyhounds access to off-leash areas prevents them from enjoying safe play, exercise, and socialisation. These are fundamental to wellbeing and to the rehabilitation of dogs that have already endured hardship in the racing industry. Keeping greyhounds permanently restricted undermines efforts to promote adoption and creates unnecessary barriers for their guardians. AJP believes the law should be changed so that greyhounds are treated like any other dog, with behaviour and training as the basis for restrictions rather than breed.

Recommendations:

- Removing the blanket requirement for greyhounds to remain on-leash in all public places.
- Granting greyhounds the same off-leash access as other breeds in designated areas.
- Recognising evidence that greyhounds are among the least aggressive breeds.
- Ensuring laws reflect behaviour-based assessment rather than outdated stigma.

7. Fees, Cost Recovery, and Accessibility

The Department has proposed changes to fee structures in line with cost recovery principles. While this may create administrative consistency, there are significant concerns that higher fees will discourage compliance among ethical operators such as small-scale rescues and community-based groups. At the same time, there is little evidence that the fees will deter poor practice among commercial breeders or other profit-driven operators. This imbalance risks undermining animal welfare outcomes while placing an inappropriate burden on ethical rescue and community groups that already deliver public-good outcomes.

Another concern is the lack of transparency about how revenue from regulatory fees is used. Without a clear link between fees collected and animal welfare outcomes, public confidence in the system is weakened. To be effective, fees must be fair, proportionate, and reinvested directly into enforcement, inspections, and education. They must also be paired with stronger penalties for serious welfare breaches. By aligning fee structures with welfare goals, Victoria can ensure the system supports compliance while holding poor operators to account.

Recommendations:

- Providing fee waivers or reductions for registered non-profits, rescues, and shelters.
- Ring-fencing regulatory fee revenue for enforcement, inspections, education, and welfare programs.
- Opposing fee structures that deter compliance but fail to curb poor practice.
- Introducing higher penalties for serious or repeat animal welfare breaches.

8. Transparency, Compliance, and Public Reporting

Transparency is essential to an effective regulatory system, yet Victoria currently lacks meaningful public reporting on compliance outcomes. Members of the public cannot easily access data about breeder inspections, enforcement actions, or shelter statistics. Without this information, there is little accountability for regulatory performance and limited external pressure for operators to maintain or exceed standards. Transparency also empowers the community to make informed decisions about where to obtain animals and helps build trust in the system.

Improved reporting would also support evidence-based policy. By publishing consistent statewide data, including de-identified statistics on impoundments, reunification, and euthanasia, the Government can track trends, identify gaps, and target resources where they are most needed. A public register of approved breeders with inspection results and recorded breaches would further strengthen accountability. These measures would bring Victoria into line with best practice in transparency and demonstrate a genuine commitment to improving outcomes for animals.

Recommendations:

- Publishing compliance and enforcement data, including complaints, breaches, and inspection outcomes.
- Maintaining a public register of approved breeders with inspection results.
- Publishing annual de-identified statistics from shelters and pounds.
- Releasing statewide microchip compliance data to track registration and reunification outcomes.

Conclusion

The Domestic Animals Regulations play a critical role in protecting animals, supporting communities, and ensuring responsible ownership. While the Department has proposed only minor updates, this review represents a significant opportunity to strengthen protections, modernise management, and improve accountability. The Animal Justice Party urges the Government to adopt reforms that go beyond minimal change and deliver meaningful outcomes for animals, people, and the environment.

We believe that failure to act decisively will leave existing shortcomings in place for another decade, perpetuating systemic problems that lead to animal suffering and undermine community trust. Stronger regulation can prevent overbreeding, reduce euthanasia rates, and support local councils and community organisations that carry the burden of enforcement and care. Equally important, it can create a system that is transparent, fair, and aligned with community expectations about how animals should be treated.

The consultation process provides an important chance to align the regulations with contemporary science, welfare standards, public values and deliver cost-effective compliance outcomes for councils and the community. By implementing reforms across breeding, sales, identification, cat management, greyhound laws, fees, and transparency, Victoria has the opportunity to set a national benchmark in animal welfare. The AJP urges the Government to seize this moment to move from minimal administrative updates to bold reforms that will create lasting positive change for animals and the people who care for them.

Reforms across breeding, sales, dangerous dogs, identification, cat management, greyhounds, fees, and transparency will ensure Victoria sets a national benchmark in animal welfare.



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