



City of Hobart Dog Management Policy

Submission of the
Australian Veterinary Association Ltd

September 2025

About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision *A thriving veterinary profession*

Purpose *Building a vibrant future for veterinary professionals.*

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2023 Ethics Index ranked veterinarians among the nation's top 10 ethical occupations¹.

1. Governance Institute 2023
(<https://governanceinstitute.com.au/app/uploads/2023/11/2023-ethics-index-report.pdf>)

AVA Statement of principles with respect to Animal Welfare

Animals are sentient beings that are conscious, feel pain, and experience emotions. Animals and people have established relationships for mutual benefit for thousands of years.

Humans have a duty of care to protect animals. Where a person does not meet his or her obligations to animals in his or her care, animals may suffer. When this happens, the law must be able to adequately intervene to enforce compliance and prevent suffering.

Animals have intrinsic value and should be treated humanely by the people who benefit from them. Owned animals should be safe from physical and psychological harm. They need access to water and species-appropriate food and shelter and should be able to fulfil their important behavioural and social needs. They must receive prompt veterinary care when required and have as painless and stress-free a death as possible.

Animals can be used to benefit humans if they are humanely treated, but the benefit to people should be balanced against the cost to the animal. They should not be used in direct combat or for purposes where suffering, injury or distress is likely to be caused.

Humans should strive to provide positive experiences to promote a life worth living for the animals in their care. We should strive for continuous and incremental improvement in the treatment and welfare of animals.

Humans have a responsibility to care for the natural environment of free-living native animals. People should take steps to preserve endangered species and protect native animals from disease where possible.

Executive Summary

The Australian Veterinary Association (AVA) welcomes the opportunity to provide follow-up input on the City of Hobart's Draft Dog Management Policy. We commend Council for considering our previous recommendations from April 2024. This submission highlights critical areas where the draft can be refined to better align with contemporary veterinary science and best practice in animal welfare.

Our key recommendations include:

- Explicitly embedding the **Five Domains of Animal Welfare** throughout the policy.
- Strengthening the policy's foundational principles to explicitly prioritise animal welfare.
- Removing references to aversive devices and unqualified advice sources in favour of positive reinforcement and **veterinary-led guidance**.
- Adopting a **behaviour-based approach** to dangerous dog management, replacing ineffective breed-specific legislation.
- Clarifying the definition of sterilisation to include medically valid options.
- Ensuring public spaces are sufficient and welfare-friendly for the physical and mental health needs of dogs.
- Strengthening public education and enforcement procedures through collaboration with veterinary professionals.

By implementing these changes, the policy can better serve the safety of the community, the protection of the environment, and the welfare of dogs in Hobart, while ensuring a compassionate, evidence-based approach to dog management.

Introduction

The AVA previously made a detailed submission in April 2024. We are pleased that several of our recommendations have been considered in the new draft and we commend Council for continuing to engage with expert feedback. This submission highlights outstanding areas for refinement to ensure the policy fully aligns with contemporary veterinary science and best practice in animal welfare.

Key Comments on the 2025 Draft

1. Principles and Objectives (Section 2)

We recommend that the guiding principles of the policy be strengthened to explicitly name and prioritise animal welfare as a core objective. This would set a clear and proactive tone for the entire document, framing dog management not just as a matter of community safety, but also as a responsibility for the welfare of the animals themselves.

2. Code of Dog Ownership (Section 3)

- a. **Five Domains of Animal Welfare:** The draft still does not embed these principles. AVA recommends explicit reference to the Five Domains (nutrition, environment, health, behaviour, and mental state), to ground the policy in modern welfare science.

- b. **Aversive Devices:** The draft (s.3.3.3) recommends “purchase an anti-barking collar.” AVA policy opposes aversive devices that use pain or fear to alter an animal's behaviour, as they can cause stress, anxiety, and aggression. Instead, positive reinforcement training and veterinary-led behavioural advice should be emphasised.
- c. **Advice sources:** Recommendations to “stream online videos” or rely on unregulated “dog trainers” risk misinformation. We recommend specifying that behavioural support should be veterinary-led, with referral to qualified trainers when appropriate.
- d. **Definition of ‘Effective Control’:** The draft’s definition of effective control (s.5.3) uses subjective and outdated language. We recommend reframing this concept positively, focusing on welfare and safety. A more appropriate definition would be that a dog is *‘under effective control when it is secured by a lead or within a designated area, responsive to its handler’s commands, and is not causing distress to itself, other people, animals, or the environment’*.

3. Barking Dogs (Section 3.3.3)

We reiterate our concern that investigations into nuisance barking must involve evidence-based expertise. Clarification is needed on what “advice and measures” officers provide at Stage 1, and what expertise informs investigations at Stage 2. Wording should specify that veterinary professionals—particularly those with behavioural expertise, are the first point of referral.

4. Fees & Sterilisation (Section 4)

The draft requires “evidence of sterilisation” but does not define sterilisation. Consistent with AVA policy, we recommend clarifying that both surgical and medical sterilisation options are valid. This includes gonad-sparing surgeries which veterinarians may issue certificates for, and these should be recognised by Council for registration purposes. For the purposes of permanent registration status, a clear distinction must be made.

While temporary measures such as hormonal contraceptives and chemical sterilants may be appropriate in some circumstances, they should not be regarded as permanent sterilisation. “Permanent sterilisation” should be explicitly defined as surgical procedures (castration, ovariectomy, ovariohysterectomy, or gonad-sparing alternatives where a certificate is issued). To ensure consistent implementation, we further recommend that Council provide clear guidance to veterinary practitioners on the certification requirements for all recognised sterilisation procedures.

5. Kennel Licences (Section 4.1)

While the draft outlines inspection criteria, it does not reference welfare standards. AVA recommends that kennel licence assessments align with our standards for boarding facilities, which extend beyond size and fencing to include enrichment, ventilation, and the ongoing welfare of dogs housed under a licence.

6. Public Access and Declared Areas (Section 5)

The policy provides a detailed list of declared areas, but does not offer an assessment of their adequacy from a welfare perspective. AVA recommends that Council review the availability and distribution of off-leash areas to ensure they are sufficient to meet the physical and mental health needs of the dog population. Welfare-friendly off-leash areas should provide adequate size, safe surfacing, and access to water and shade.

7. Dangerous Dogs (Section 7)

- a. **Breed-specific legislation (s.7.3):** The restricted breeds list remains. AVA opposes BSL as it is ineffective in preventing dog attacks and unfairly penalizes dogs based on appearance rather than individual behaviour. Management should be behaviour-based and owner-focused.
- b. **Aggression language:** References to “aggressive dogs” are subjective. Aggression is a part of normal canine behaviour and requires context. Wording should be reframed to focus on risk assessment and management.
- c. **Enclosure requirements (s.7.2):** The draft prescribes 10m² space per dog but does not address enrichment or quality of life. The AVA recommends that enclosures allow for exercise and mental enrichment. Dangerous dogs should not be permanently confined and may reside with families under supervision, while incorporating the Five Domains to ensure comfort and wellbeing.

8. Captured Animals (Section 6)

The draft allows officers to return dogs directly to owners. AVA recommends clarity on ownership disputes (microchip vs. council registry) and the establishment of formal safeguards to prevent the return of a dog to a domestic violence situation, where the animal or individuals could be placed at risk. Council should require contractors (e.g., Dogs’ Home of Tasmania) to meet AVA standards for animal shelters and pounds, which focus on humane care, handling, and rehoming practices.

9. Public Education and Promotion (Section 8.2)

The draft describes officer-led education, but veterinary expertise is not explicitly referenced. AVA recommends ensuring veterinarians are involved in public education campaigns, including a formal role in events like ‘Dogs on the Domain’, and in the development and review of all public guidance material prior to publication, to guarantee information is accurate, evidence-based, and welfare-focused.

10. Environmental Protection (Section 8.4)

AVA supports restrictions to protect biodiversity. However, the draft wording that chasing wildlife “may encourage predatory behaviour” is inaccurate. The behaviour is instinctive, not encouraged by single incidents. We recommend removing or amending this wording. Ongoing consultation with veterinarians and behaviourists should inform the balance between access and protection.

11. Patrols and Enforcement (Section 8.5)

The AVA recommends that enforcement of the policy be consistently applied and underpinned by a strong educational component. Officers should be trained to provide clear, evidence-based advice and support to dog owners, ensuring that compliance is achieved through education and positive engagement, rather than solely through punitive measures.

Conclusion

The AVA commends Hobart City Council for its continued review and consultation process. To strengthen the policy, we recommend:

- Explicitly embedding animal welfare as a core principle and incorporating the Five Domains of Animal Welfare throughout.
- Removing references to aversive devices and unqualified training sources.
- Defining sterilisation clearly and recognising medical/surgical options.
- Aligning kennel licence assessments with national welfare standards.
- Ensuring the provision of public access areas is sufficient and welfare-friendly.
- Replacing breed-specific restrictions with behaviour-based approaches.
- Clarifying dangerous dog enclosure rules to ensure enrichment and family integration.
- Strengthening captured animal processes with clear ownership criteria and safety safeguards.
- Ensuring veterinary expertise informs public education and refining environmental protection wording to reflect accurate behavioural science.
- Adopting an educational and consistent approach to patrols and enforcement.

By making these refinements, Hobart City Council can ensure its Dog Management Policy balances community safety, environmental protection, and animal welfare, while aligning with national best practice and veterinary expertise. This is particularly important in an economically challenging environment where responsible pet ownership may be strained, and a compassionate, evidence-based policy is more crucial than ever.

Relevant AVA Policies

This submission is informed by the following key Australian Veterinary Association (AVA) policies:

- [Surgical sterilisation of dogs and cats policy:](#) Supports both traditional and gonad-sparing sterilisation methods, and the recognition of certification for both.
- [Boarding facilities including dog and cat daycare centres:](#) Outlines standards for kennel assessments that go beyond basic space requirements to include welfare considerations like enrichment, ventilation, and social needs.
- [Animal shelters and municipal pounds:](#) Provides a framework for humane care, handling, and rehoming practices for captured or surrendered animals.
- [Dangerous dogs and dog bite prevention:](#) Opposes Breed-Specific Legislation (BSL) as ineffective and advocates for a focus on dog behaviour and owner responsibility in managing dangerous animals.
- [The use of punishment and negative reinforcement in dog training:](#) Recommends training methods based on positive reinforcement and opposes the use of aversive devices.

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