



Victorian Domestic Animals Regulations

Submission of the
Australian Veterinary Association Ltd

August 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 feedback on the draft Domestic Animals Regulations 2025 and the accompanying Regulatory Impact Statement (RIS). This submission outlines key recommendations to ensure the final legislation is robust, effective, and reflects contemporary animal welfare science.

Our primary concerns and recommendations are as follows:

- **Permanent Identification & Microchip Registries:** The current fragmented system creates an administrative burden on veterinary practices and undermines animal traceability. The AVA advocates for a single, centralised registry that is integrated with council databases.
- **Breeding and Sales:** The draft lacks sufficient welfare standards for breeders and pet sellers. We recommend mandating comprehensive veterinary health checks for breeding animals, prohibiting breeding practices that perpetuate extreme conformations (e.g., brachycephaly), and banning the sale of unweaned altricial birds.
- **Dog Training:** The regulations fail to specify training method standards. The AVA recommends mandating positive reinforcement techniques and explicitly prohibiting aversive devices like shock collars.
- **Dangerous Dogs & Enforcement:** The reliance on breed-specific legislation is ineffective and should be replaced with a behaviour- and owner-responsibility-based framework. We also advocate for a tiered penalty system that protects veterinarians acting in good faith.
- **Veterinary Practice & Compliance:** The regulations place undue administrative burden and liability on veterinary professionals. Our submission recommends streamlining reporting processes, sharing data accuracy responsibility, and removing the unnecessary 24-hour vet reporting requirement for reuniting animals.
- **Regulatory Impact Statement (RIS):** The RIS underestimates the true compliance costs for veterinary practices and undervalues the broader animal welfare benefits of the recommended reforms.

The AVA supports legislative frameworks that enhance animal welfare, promote responsible ownership, and are both practical and effective. We believe that by adopting these recommendations, the 2025 Domestic Animals Regulations will achieve a higher standard for animal welfare in Victoria.

Part 2 - Applicable Organisations & Dog Obedience Training

Issue: Regulations 11–12 prescribe skills assessments for approved training organisations but do not specify standards for training methods. This omission creates scope for harmful aversive techniques such as shock collars, prong collars, and choke chains, which are inconsistent with contemporary animal welfare science and can cause physical and psychological harm. The AVA's policy is clear that these methods are outdated and should not be endorsed by a government-approved scheme.

Recommendation:

- **Mandate Positive Reinforcement:** The Regulations should explicitly require approved organisations to use evidence-based, positive reinforcement methods that build on animal psychology and learning theory.

- **Prohibit Aversive Devices in Codes of Ethics:** Mandate that codes of ethics for approved organisations (Regs 7–10) explicitly prohibit the sale or use of aversive devices. This would align the regulations with best practice and prevent the endorsement of harmful training practices.

Part 3 - Dangerous Dogs & Restricted Breed Dogs

Issue: Regulations 13–17 impose restrictions on dogs based on breed type, including enclosure, signage, and collar requirements. The AVA has long opposed breed-specific legislation (BSL), as it is ineffective in reducing dog attacks and unfairly targets particular breeds based on appearance rather than behaviour. The evidence consistently demonstrates that behaviour- and owner-responsibility-based regulation is more effective in protecting both animals and the community.

Recommendation:

- **Remove Breed-Based Restrictions:** Amend the Regulations to remove breed-based restrictions and replace them with comprehensive measures focused on individual dog behaviour and owner responsibility.
- **Update Enclosure and Signage Standards:** Update enclosure and signage standards to reflect individual dog behaviour, risk assessment, and best-practice animal welfare principles. This will ensure they are applied fairly and effectively while safeguarding both welfare and public safety.
- **Provide Council Transition Provisions:** Provide clear transition provisions and support for councils to move away from outdated breed-based systems to a more effective, behaviour-centric approach.

Part 4 - Permanent Identification & Microchip Registries

Prescribed Identifying Information (Reg 20)

Issue: Regulation 20 prescribes additional information to be recorded, such as reproductive status, source number, and alternate contact details. While this data is valuable, the additional administrative obligation on veterinary practices and staff is significant. Manual data entry is prone to error and can disproportionately burden clinics.

Recommendation:

- **Streamline Reporting via a Single Portal:** Streamline the reporting process through a single, government-approved portal that seamlessly integrates with council databases, ensuring veterinarians are not required to input data into multiple systems.
- **Prevent Disproportionate Burden:** Ensure additional data requirements do not disproportionately burden veterinary staff, taking into account the impact on clinical time and the potential for a negative effect on efficiency and service delivery.

Implanter Obligations (Regs 25–32)

Issue: Regulations 25 to 32 place a legal obligation on implanters, primarily veterinarians, to scan, verify, and record detailed information. While the AVA supports measures to improve data accuracy, the current wording places the full liability for errors on the implanter. This creates an unfair legal and professional risk for veterinarians who are acting in good faith. A veterinarian's primary role is to

provide clinical care and safeguard animal welfare, not to serve as a compliance or data auditor for external databases that may be outdated or contain incorrect information.

Recommendation:

- **Specify "Good Faith" Protections:** The regulations should include a clause that explicitly protects veterinarians from prosecution or penalties if they have made reasonable efforts to comply with the regulations and the information provided to them was, to the best of their knowledge, accurate at the time of the procedure. For example, a veterinarian should not be held liable for inaccuracies if a client provides false information or if the animal's details are not subsequently updated in an external registry.
- **Share Responsibility:** Advocate for a system where data accuracy is a shared responsibility among all stakeholders. Registries and councils must be held accountable for maintaining and validating the data, rather than placing the entire compliance burden on veterinary staff.
- **Streamline Data Transfer:** Support the development of a secure, real-time electronic portal that allows veterinarians to submit all required information directly to a central database at the time of the procedure. This will reduce manual transcription errors and ensure immediate synchronization, improving overall data integrity while simplifying the process for veterinary practices.

Registry Licence Conditions (Regs 35–55)

Issue: Registries are required to maintain complaint systems, provide monthly reports, and manage records. While this accountability is welcome, poor integration across registries could increase veterinary workload if systems are not harmonised.

Recommendation:

- **Support Strong Licence Conditions:** Support strong registry licence conditions, provided they demonstrably reduce duplication and improve accuracy for all stakeholders.
- **Require Interoperability:** Require seamless integration between registries and councils to allow a single point of update for pet owners and veterinarians, consistent with AVA's policy on electronic identification. This would eliminate the need to update multiple databases.
- **Ensure Efficient Veterinary Portals:** Mandate that registries provide efficient, user-friendly portals specifically designed for veterinary practices to simplify and expedite the data submission and retrieval process.

Part 5 - Commercial Dog Breeder Approvals

Issue: Regulations 57–62 set licensing conditions, staff training requirements, and insurance provisions, but they do not go far enough to safeguard animal welfare. The AVA has consistently argued that breeding practices must protect the physical, behavioural, and social needs of animals, and that enforcement must be properly resourced. The Regulations should not only focus on paperwork but on tangible animal welfare outcomes.

Recommendation:

- **Require Veterinary Health Checks:** Mandate comprehensive veterinary health checks as a prerequisite for breeding approval, especially for breeds predisposed to inherited or congenital disorders. This would align with AVA policies on responsible breeding.

- **Prohibit Extreme Conformations:** Explicitly prohibit breeding practices that perpetuate extreme conformations, such as brachycephaly, which compromise an animal's health and quality of life and create significant financial burden for dog owners.
- **Mandate Veterinary Oversight:** Require annual welfare monitoring and staff competency records to be reviewed and signed off by a registered veterinarian to ensure professional standards are met.
- **Set Minimum Training Requirements:** Support minimum training requirements (e.g., Certificate III or equivalent) for breeder staff, alongside ongoing Continuing Professional Development (CPD) and veterinary oversight to ensure a high level of expertise in animal care.
- **Oppose Fee Reductions:** Oppose reductions in breeder approval fees, as enforcement and proper resourcing of monitoring and compliance activities require sustained funding.

Part 6 - Animal Sale Permits & Caged Bird Sales

Issue: Regulations 63–65 establish permit conditions such as provision of water, weather protection, and evacuation plans, and require reporting of caged bird sales. However, these provisions do not adequately address the significant welfare risks associated with impulse sales or the sale of unweaned birds, which the AVA has specific policies against.

Recommendation:

- **Prohibit the Sale of Unweaned Birds:** Explicitly prohibit the sale of unweaned altricial birds, as they require highly specialised care that is often beyond the capability of the average pet owner, leading to poor welfare outcomes.
- **Prohibit Impulse Sales:** Prohibit impulse or market-based sales and require sales only through traceable and responsible outlets that provide full disclosure and post-sale support.
- **Introduce Minimum Standards:** Introduce specific minimum housing and enrichment standards for caged birds, reflecting a commitment to their physical and psychological well-being.
- **Mandate Veterinary Checks:** Require veterinary health checks for all animals sold under permits to ensure they are healthy and suitable for sale.
- **Expand restrictions to sales:** Consider extending the restriction of sale of young animals to include chelonians (turtle, terrapin, or tortoise) that are often sold far too young.

Part 7 - Pet Shop Records

Issue: Regulation 66 prescribes recordkeeping requirements, but these are minimal and do not guarantee full traceability of animals. The current regulations fall short of establishing a robust and auditable chain of custody from breeder to purchaser.

Recommendation:

- **Expand Record Requirements:** Expand records to include veterinary health checks and a complete chain of custody, including full breeder and source details.
- **Ensure Auditable Records:** Require records to be kept in a comprehensive and auditable digital form for a minimum of five years, allowing for swift and efficient investigations in cases of welfare concerns or disease outbreaks.

- **Mandate Centralised Reporting:** Require pet shops to report this information to a central database, ensuring traceability and reducing the administrative burden on vets and councils in managing individual cases.

Part 8 - Information Register & Source Numbers

Issue: Regulations 67–70 prescribe information to be provided to the Secretary but fail to address widespread issues with fraudulent or missing source numbers. Online platforms, in particular, remain a major loophole, enabling the illegal sale of animals and undermining the integrity of the system.

Recommendation:

- **Mandate Linkage:** Mandate a direct and unalterable linkage between source numbers and microchip numbers at the point of sale.
- **Introduce Real-Time Validation:** Introduce a mechanism for real-time validation of source numbers against a central register to prevent the use of fraudulent numbers.
- **Increase Penalties and Enforcement:** Increase penalties and fund proactive enforcement against non-compliant platforms and individuals.
- **Require Random Inspections:** Support random, unannounced inspections of breeders to ensure compliance.
- **Fund Public Education:** Fund sustained public education campaigns to raise awareness of source numbers, why they are important, and how to verify them.

Part 9 - Reuniting Dogs & Cats with Owners; Shelters & Pounds

Issue: Regulations 71–75 place obligations on councils, shelters, and pounds. However, the proposal for veterinarians to notify councils within 24 hours of reunification is inappropriate, burdensome, and may deter owners from seeking veterinary care for their pets for fear of being penalised. Furthermore, the provisions for shelters and pounds require stronger, more explicit welfare protections.

Recommendation:

- **Remove Vet Reporting:** Remove the 24-hour veterinarian reporting requirement.
- **Strengthen Council Obligations:** Strengthen council and shelter obligations to proactively and promptly notify owners via registry data.
- **Mandate Veterinary Oversight in Shelters:** Require veterinary oversight for all animals entering shelters, pounds, and rescue clubs, including mandatory health checks upon intake.
- **Mandate Humane Euthanasia Protocols:** Require that euthanasia protocols explicitly specify humane methods carried out by or under the supervision of a veterinarian, consistent with the AVA's policies on this matter.
- **Mandate Auditable Recordkeeping:** Mandate comprehensive, auditable recordkeeping of intake, treatment, rehoming, and euthanasia, with data feeding into a central monitoring system for improved transparency and accountability.

Part 10 - Prescribed Offences & Enforcement

Issue: Regulations 77–78 establish penalties, but without nuance, they risk penalising veterinarians for minor administrative errors when acting in good faith. A flat penalty structure does not differentiate between intentional cruelty and a simple clerical mistake.

Recommendation:

- **Adopt a Tiered Penalty Framework:** Adopt a tiered penalty framework that distinguishes between deliberate cruelty and minor administrative breaches.
- **Provide Explicit Protections:** Provide explicit protections for veterinarians acting in good faith and in line with professional standards.
- **Ensure Alignment:** Ensure all enforcement and penalty provisions are aligned with the Veterinary Practitioners Registration Board of Victoria Guidelines on end-of-life veterinary services and professional conduct.

Cats (Cross-cutting across Parts 4 & 9)

Issue: The Regulations cover registration, desexing, and permanent identification of cats, but inconsistent council-level approaches risk undermining traceability and compliance. This lack of a consistent, state-wide approach creates confusion for both pet owners and veterinary practices.

Recommendation:

- **Support Consistency:** Support consistent desexing and microchipping requirements for cats across all councils, ensuring a single standard applies throughout the state.
- **Ensure Enforceable Obligations:** Ensure that council obligations for cat traceability are both enforceable and practical for those tasked with administration.
- **Avoid Unnecessary Burden:** Avoid placing unnecessary administrative burden on veterinary practices in administering these requirements, for example, by ensuring seamless electronic reporting.

Regulatory Impact Statement (RIS)

Issue: The RIS underestimates compliance costs for veterinary practices and undervalues the broader animal welfare and community safety benefits of reform. A comprehensive RIS must accurately reflect the full cost-benefit analysis.

Recommendation:

- **Revise Assumptions on Costs:** Revise assumptions to reflect the true cost to practices, including staff training, software updates, and administrative time. This requires genuine consultation with the AVA and other veterinary stakeholders.
- **Consider Impact on Client Access:** The RIS should consider the potential impact on client access to veterinary care if compliance costs are not properly accounted for. High costs may discourage practices from providing certain services.
- **Re-evaluate Benefits:** The RIS must re-evaluate benefits of reforms such as centralised microchipping in terms of improved animal welfare, public health, biosecurity, and public safety, not just administrative efficiency.

Relevant AVA Policies

This submission draws on the following established AVA policies – we encourage the Victorian Government to engage with these policies and use them to inform the process of updating and improving the regulations.

- [Electronic Identification of Animals \(2016\)](#)
- [Puppy Farming \(2018\)](#)
- [Selective Breeding Based on Genetic Testing of Companion Animals \(2016\)](#)
- [Brachycephalic Dog Breeding \(2021\)](#)
- [Animal Shelters and Municipal Pounds \(2017\)](#)
- [Companion Animals in Pet Shops \(2018\)](#)
- [Euthanasia \(2019\)](#)
- [Sale of Unweaned Altricial Birds \(2018\)](#)

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