

21 April 2025

Submission for Kingston City Council's Domestic Animal Management Plan 2026-2029

The Australian Pet Welfare Foundation (APWF) is a peak research body and advocate for pet welfare in Australia. As a not-for-profit organisation, APWF uses science-based research to enhance community well-being and improve the health and welfare of animals and people. APWF specialises in evidence-based solutions to prevent euthanasia of healthy and treatable companion animals in shelters and pounds and the associated mental health damage to staff and community residents. We share research knowledge with the community, shelters and pounds, state and local governments and veterinarians to create change and save animal and human lives. APWF is led by Chief Scientist Dr. Jacquie Rand, Emeritus Professor of Companion Animal Health at The University of Queensland (UQ) and a registered specialist veterinarian in small animal internal medicine. She has worked extensively in shelter research over the last 17 years, including collaborative studies with the RSPCA, Animal Welfare League and local governments. While at UQ Dr Rand taught Urban Animal Management and since 2013 has co-authored over 30 peer-reviewed articles on urban animal management including management of semi-owned and unowned cats. Dr Rand is an AVA member.

You can read more about us and our vision on our website: <https://petwelfare.org.au>.

Evaluation of animal control services provided by the Council

Based on the current 2021–2025 Domestic Animal Management Plan, the services provided are broadly consistent with those offered by other councils across Victoria. Core functions such as animal identification and registration, complaint response, routine patrols, and public education are well established and largely reactive in nature. However, there are a few proactive initiatives worth noting, including the annual the registration giveaway promotion, designed to increase compliance and community engagement. Additionally, the use of a dedicated lost and found social media site demonstrates a more modern, proactive approach to reuniting pets with owners.

While community consultation is a valuable component, DAMPs are intended to be evidence-based and strategically aligned with legislative requirements, animal population data, service needs, and welfare outcomes. Relying heavily on a small, unrepresentative sample—such as the 2021 survey with only 148 respondents—risks

skewing priorities and overlooking the needs and views of underrepresented groups, such as cat owners or vulnerable communities. Broader and more inclusive engagement, combined with robust data, should underpin DAMP decision-making.

Training of authorised officers

The City of Kingston's animal management services are delivered by a relatively small team of multi-skilled officers, responsible for a wide range of duties beyond just animal-related issues. While this flexible, generalist model may suit broader compliance roles, animal management is a highly specialised field that demands a unique skill set, not just knowledge of legislation and enforcement, but also practical animal handling, community engagement, conflict resolution, and often a high level of emotional resilience. According to the 2021-2025 DAMP, the data highlights that officers are servicing a large and diverse municipality of over 165,000 residents, with more than 19,000 registered domestic animals and 21 animal businesses, yet only nine Local Laws Officers are tasked with much of this frontline work, often alongside non-animal-related duties. The absence of dedicated animal management specialists within the team structure raises concerns about the adequacy of support, training, and experience required to deliver high-quality, safe, and empathetic animal services.

While Council provides operational procedures and access to training under the DAA's Section 68(A)(2)(b), there is little evidence of a structured or mandatory skills development pathway specifically tailored to animal management. Given the growing complexity of this space, including issues around dog aggression, cat population management, and animal welfare, officers need more than ad hoc access to SOPs or general OHS guidelines. This is not a role everyone is suited to; animal management officers must be both technically proficient and emotionally equipped to handle situations ranging from public safety threats to distressed pet owners. Without targeted recruitment, robust training programs, and clearer role delineation, the current model risks placing unprepared staff in high-pressure environments, potentially compromising both community and animal outcomes.

While requiring a minimum of Certificate IV in Justice ensures foundational knowledge in compliance and enforcement, these qualifications do not include any formal training in cat handling or cat management. This highlights a significant gap, given the complexity of managing free-roaming and semi-owned cats, which requires specific animal handling skills, welfare knowledge, and community engagement expertise not covered in general justice or law enforcement courses.

To minimise the risk of attacks by dogs on people and animals

The City of Kingston's 2021–2025 Domestic Animal Management Plan (DAMP) outlines clear strategies to reduce dog attacks in accordance with Section 68A(2)(c)(iii) of

the Domestic Animals Act. While existing enforcement procedures, such as the requirement for dogs to be leashed outside designated off-leash areas, the issuing of infringement notices, and formal investigations of attack incidents, are important for public safety, there is a valuable opportunity to enhance these efforts through more proactive and preventative engagement. With 200 reported dog attacks or rush offences in a single financial year (2019/20), yet only 7 prosecutions, the data suggests that many incidents are relatively minor and may be preventable with early intervention. With 34 infringements issued for minor dog attacks, it's important to understand what follow-up measures were taken by Authorised Officers, was the response purely financial, or were efforts made to engage owners in conversations about fencing, training, and behavioural solutions to prevent future incidents?

Engaging with dog owners at the first sign of minor non-compliance, such as dogs not under effective control or rushing people, could prevent future escalations. Authorised Officers could be supported to hold constructive conversations with owners, offering practical advice on fencing improvements, behavioural support, and accessible dog training programs. These meaningful, non-punitive interactions foster education and responsibility, especially in cases where owners may be unaware of the risks or lack the resources to address them. This kind of early intervention strategy not only helps reduce the likelihood of serious incidents but also builds community trust in Council's approach, shifting the focus from reaction and penalties to prevention and partnership.

To address any over-population and high euthanasia rates for dogs and cats

Definitions of cats

The APWF recognizes and supports the definitions of cats as delineated in the findings and recommendations from the RSPCA Australia's 2018 report, "Identifying best practice domestic cat management in Australia." These definitions categorize cats as Feral and Domestic (owned, semi-owned, unowned).

Domestic cats

Domestic cats live around where people live and frequent. Cat management strategies should recognise three subcategories of domestic cats, as recommended by RSPCA (2018 report) including:

➤ **Owned cats** – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies. These cats are also called pet cats.

➤ **Semi-owned cats** – these cats are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are of varying sociability and are sometimes called stray cats.

➤ **Unowned cats** – these cats are indirectly dependent on humans and receive food from people unintentionally, such as via food waste bins. These cats are of varying sociability and are sometimes called stray cats.

Feral Cats

- **Feral cats-** Feral cats have no relationship with or dependence on humans (neither direct nor indirect), survive by hunting or scavenging for food, and live and reproduce in the wild (e.g., forests, woodlands, grasslands, deserts). Feral cats do not live in the vicinity of where people live and they do not receive food from humans intentionally (direct feeding) or unintentionally (e.g. via food waste bins). Feral cats are completely unsocialised to humans and have none of their needs fulfilled by humans. Feral cats are not found or trapped in the vicinity of where people live, are not the subject of nuisance complaints and do not enter Australian council pounds or animal shelters.

Failure to recognize and apply these definitions in cat management programs can have severe consequences, leading to ineffective strategies and unnecessary euthanasia. When semi-owned and unowned domestic cats are misclassified as feral, they are often subjected to lethal control measures rather than being included in community-based desexing and rehoming programs. This misclassification undermines the effectiveness of proactive, humane solutions such as targeted desexing, which have been shown to stabilize and reduce free-roaming cat populations over time.

Additionally, conflating domestic cats with genuinely feral cats can result in misguided policies that penalize community members who provide informal care to semi-owned cats, discouraging public participation in effective management strategies. Without clear distinctions, councils may rely on reactive, punitive measures rather than investing in sustainable, evidence-based programs that reduce intake at shelters, improve animal welfare, and ultimately decrease the number of free-roaming cats in the long term.

Recognizing these definitions is essential to ensuring that cat management policies are humane, effective, and aligned with best practices in animal welfare. Research demonstrates that pet cats can respond with more aggressive behaviours to humans when highly stressed than genuinely feral cats. It is critical that before a decision that a cat is euthanised on behaviour, it is given sufficient time to adapt to a stressful environment. Outcome decisions relating to euthanasia based on behavioural characteristics must be deferred to allow the cat sufficient time to habituate to the unfamiliar environment (e.g., shelter or pound), given the likelihood that these cats will experience high levels of fear in a trap cage or unfamiliar environment. By not allowing a stressed cat to settle into the environment, this may result in the cat exhibiting signs of being unsocial and ultimately lead to higher euthanasia.

Community Cat Programs

The APWF supports the expansion of **innovative desexing initiatives** such as that implemented in the City of Banyule (Cotterell 2024). These programs must include clearly defined, measurable objectives over 3–5 years and be targeted to suburbs with high shelter intakes or cat-related complaints. Within these areas, microtargeting specific streets or neighbourhoods where cats are most at risk of impoundment or surrender ensures greater impact. Effective programs also require sufficient intensity, desexing 30 cats per 1,000 residents annually in targeted suburbs or 10 per 1,000 with microtargeting, otherwise objectives are unlikely to be achieved.

Strong local partnerships are essential for success. **Collaborating with veterinarians and welfare agencies can expand low-cost or free desexing**, particularly for people who cannot access or afford private clinics. Programs should be adapted to local needs and barriers. A limiting factor is veterinary capacity, which constrains broader rollout. High-volume clinics offering early-age desexing should be supported, and animal welfare agencies encouraged, potentially funded, to develop such facilities for public access. Effective cat management requires coordinated community-wide efforts and cannot rely on a single agency.

Cat impoundments are highest in low-income regional areas (Chua 2023, Albertson 2016), where veterinary services may be inaccessible. These regions need affordable desexing options. Mobile clinics could service towns without a vet, including farming communities. Alternatively, transporting cats up to two hours to a clinic is safe and commonly practised in remote areas of the USA. Desexing and transport services should be supported by partnerships with local veterinary practices.

To reduce unwanted cats, economic barriers to desexing must be addressed, particularly for low-income households or to assist residents with financial stress. This requires affordable programs and grants targeted to vulnerable Victorians. Success depends on microtargeting based on data from cat-related calls and impoundments. Positive, assistive AMO engagement with people who own entire cats, especially those experiencing disadvantage, is essential. The Banyule model (Cotterell 2024) demonstrates how such engagement in disadvantaged areas can reduce shelter intake and euthanasia.

Many cat carers struggle, especially during the current cost-of-living crisis, cannot afford desexing, especially when managing multiple cats. These individuals require fully subsidised or very low-cost services. Council grants to enable AMOs to facilitate desexing for such cases would be highly effective. Transport assistance may also be required, and using AMOs to support **transport to surgery is a more constructive use of their time than impoundment.**

While general desexing promotion is helpful, **programs not targeted to those most in need may have limited impact** (Frank 2007), often subsidising those who would have desexed their pets anyway. It is essential that programs are place-based, microtargeted to areas of need, and free from access barriers such as requiring pension or concession cards. Vouchers for local clinics may not be effective due to vet shortages and rising service costs. Based on RSPCA NSW experience (Ma 2023), only half of participants in microtargeted programs held benefits cards, highlighting that many who need help fall outside traditional criteria.

Addressing cat overpopulation effectively requires community partnerships and tailored, microtargeted responses. The APWF strongly supports place-based desexing programs that combine suburb-level targeting based on nuisance cat reports and impoundments, with local outreach by program staff. This dual approach, targeting where the problem is greatest and providing direct support to residents, offers the best chance for lasting, measurable impact on cat overpopulation and welfare.

Subsidised desexing Vs Targeted Free Desexing

Subsidised desexing programs, while helpful, often primarily attract pet owners who were already planning to desex their animals, acting more as a **cost-saving substitution rather than shifting behaviour**. These programs tend to reach those who are proactive about pet care but are simply seeking a more affordable option. In contrast, free desexing programs combined with targeted community outreach have proven far more effective at reaching individuals who would not otherwise desex their pets at all. By removing financial and logistical barriers and engaging directly with communities, particularly in disadvantaged areas, these initiatives capture a harder-to-reach group, including owners of semi-owned or unowned animals. This approach results in a much greater overall impact on reducing unwanted litters and managing free-roaming cat populations, which reduce intake.

Community Cat Programs play a vital role in humane, effective urban cat management by focusing on the real source of cat-related issues, domestic cats that are owned, semi-owned, or unowned, rather than truly feral animals. Best practice recognises that nearly all cats found in urban areas fall within the Domestic category, even if they are frightened or unsocialised when impounded. Misclassifying these cats as "feral" risks unnecessary euthanasia and undermines the potential for rehabilitation, fostering, and rehoming. By accurately identifying cats and directing targeted desexing and outreach efforts, particularly in areas with high complaint rates or economic disadvantage, Community Cat Programs can dramatically reduce shelter intake, euthanasia, and nuisance complaints. Evidence from successful initiatives like Banyule, RSPCA NSW, and APWF microtargeted program shows that with the right approach, councils can achieve substantial welfare gains and cost savings without resorting to enforcement or containment laws.

To encourage the registration and identification of dogs and cats

The City of Kingston employs a mix of proactive education and compliance strategies to support responsible pet ownership and increase animal registration rates. One of the most valuable aspects of the current approach is the commitment to returning registered animals to their homes whenever possible. Authorised Officers are equipped with microchip scanners and laptops to check registration details in real-time while patrolling streets, parks, and foreshore areas. This not only helps quickly reunite pets with their owners but also reduces the number of animals entering the pound. Injured or deceased animals are similarly scanned for microchips or tags to notify owners, demonstrating a compassionate and thorough service standard.

In terms of enforcement, the council takes a fair and measured approach. During the non-audit period, pet owners found with unregistered animals are first issued a 7-day registration notice, allowing them time to voluntarily comply before any penalties are applied. This grace period reflects an understanding that non-compliance is sometimes due to oversight rather than intent. The council's door knock approach targeting previously registered but currently unregistered animals can be an effective way to raise revenue, but it largely focuses on reactivating lapsed registrations rather than reaching households that have never registered their pets. While framed as a compliance strategy, this method often results in administrative revenue recovery rather than addressing the root causes of non-compliance. It is also labour-intensive and resource-heavy for council officers.

Proactive and supportive programs, such as implementing an SMS reminder system, social media and community Facebook pages may be more efficient, less costly, and better received by the community. These types of initiatives help reduce accidental lapses in registration by providing timely prompts and may achieve higher compliance in a more positive and less confrontational manner. Investing in such supportive tools could not only ease enforcement burdens but also foster stronger relationships with pet owners.

To minimise the potential for dogs and cats to create a nuisance

The City of Kingston has implemented a range of positive, proactive programs to support responsible dog ownership while maintaining public amenity. Their education and promotional activities cover key topics such as dog confinement, leash laws, barking, aggression prevention, and the importance of socialisation and exercise. The promotion of designated off-leash areas and agility parks encourages positive behavioural development in dogs while providing owners with clear guidelines. The council also supports responsible ownership through community rewards, like free treats and show bags for compliant pet owners, and practical tools such as "Pooch Pouches"

and free biodegradable dog waste bags available at customer service centres, libraries, and reserves. These initiatives help build goodwill between pet owners and council, while also promoting public health and environmental responsibility. Combined with the council's existing education campaigns, such reminders could increase compliance in a non-confrontational manner.

Furthermore, initiatives like requiring non-compliant owners to attend responsible dog ownership or training courses demonstrate a rehabilitative approach to enforcement. Patrols targeting dogs at large, particularly during periods of high wildlife activity, help protect local fauna, while efforts to reunite wandering registered pets with owners before impounding reflect a compassionate and cost-effective compliance method. Overall, these efforts show a strong foundation in community education and pet welfare, though there remains room to enhance efficiency through digital engagement and data-driven targeting.

Cat Containment

The APWF strongly recommends keeping cats contained indoors at night, and during the day, if possible, on their owners' property in a comfortable environment that meets their physical and mental needs. However, the **APWF is against mandated cat containment** (night curfews and 24/7) because it results in increased cat-related complaints, impoundments, and euthanasia, as well as higher costs and enforcement difficulties for local governments. Additionally, **mandated cat containment fails to reduce the overall number of wandering cats in the short and long term**, both in Australia and internationally, and is a barrier to solving the free-roaming cat problem.

For cat containment to be successful, clear measurable goals need to be first identified such as reduced wandering and nuisance cats and/or reduced risk of wildlife predation. For successful implementation it is **critical to recognize the source of the problem**, geographic locations where the issues are greatest, and barriers in these areas for residents to successfully contain their cats. For example, free-roaming domestic cats and cat-related complaints are greatest in disadvantaged areas. In these areas, many free-roaming cats are semi-owned cats or unidentified owned cats with disadvantaged owners. Mandated containment will not achieve the hoped for goals, because firstly, most free-roaming cats in these areas are unidentified.

Secondly, many **disadvantaged residents simply have no ability to comply**, and therefore mandated containment becomes a social justice issue. In areas where free-roaming cats are most numerous and problematic, many residents live in low-cost rental properties that have inadequate fencing for cat containment, and may have no screens on windows and doors or air-conditioning. Containment fencing is often in the range of \$700 to \$2000 or more and is simply not affordable for community members to comply with cat containment mandates. Unfortunately, no subsidy is available to encourage their

purchase, and cheaper options, such as PVC pipe installations, may require specific skills that some individuals do not possess. Additionally, many community members live in apartment blocks without access to a yard, leaving them with only communal spaces where they cannot put an enclosure. This is particularly common in social housing, where residents may not have flyscreens on windows and, therefore, cannot physically contain their cats, and fencing is inadequate to fit even inexpensive PVC tubing.

Promoting simple low or minimum cost solutions such as bed-time feeding is likely to get more compliance, especially effective night-time compliance. Night-time containment is effective at protecting vulnerable wildlife, because it is a time when cats and threatened and endangered species most susceptible to cat predation (nocturnal mammals such as squirrel gliders and phascogales) are most likely to interact.

Bedtime feeding of cats is recommended as a highly effective way to assist cat owners at minimal to no additional cost to keep owned pet cats safely inside at night and prevent potential wildlife predation and nuisance behaviours such as fighting. This involves feeding cats inside at bedtime and ensuring all doors and windows are shut for the night, providing many owners with a way to safely confine their cat in the house/dwelling overnight. Bed-time feeding should be widely promoted to raise awareness among cat owners to increase cat containment at night, however, containment should not be made mandatory. This is because containment may not be achievable, for example for owners with no air-conditioning and inadequate screening on windows and doors, and no suitable secure area. In addition, mandating containment leads to increased costs and enforcement difficulties for local governments and other unintended negative consequences including severe mental health impacts on community residents and staff associated with euthanising healthy cats and kittens. Mandated cat containment also prevents the resolution of the problem of wandering cats by creating a significant obstacle for cat semi-owners to take full ownership of the stray cats they are feeding.

Mandating cat confinement creates a false hope within the community that the problems will be fixed once implemented and enforced. However, enforcement cannot occur when there is no owner for a cat, and effective enforcement requires an owner to be issued with the infringement or notice. In the relatively few cases where an owner or semi-owner is identified, they often have no ability to comply. Infringements issued by the council noncompliance can further financially burden cat owners without achieving containment.

Mandating cat containment is seen as a popular solution to the free-roaming cat and nuisance problem. However, this is because the community does not understand the cause of the problem (low socioeconomic, semi-owned and unidentified owned cats), nor do they understand the adverse impacts of such a program on staff mental health and job satisfaction, nuisance complaints and costs to councils and welfare agencies. They also do not understand that evidence from Victoria demonstrates

they are not effective, while microtargeted desexing programs are successful at reducing the problem.

The **expansion of local cat confinement laws will not solve the issue** of semi-owned and stray domestic cats, as has been shown in previous instances such as Yarra Ranges Council and Casey Council (further details at [APWF 2023](#)). Furthermore, some councils have produced reports stating that curfews are unenforceable (Hobsons Bay Council, Hume City Council). In the City of Yarra Ranges (Victoria), in the 3rd year after mandating 24/7 cat containment, cat-related complaints increased by 143%. Yarra Ranges Council acknowledged that the significant increase in cat complaints was likely the result of the introduction of a 24-hour cat curfew in 2014. In addition, impoundments increased by 68%, and euthanasia increased by 18% (human population only increased by 2%) (Yarra Ranges 2021).

In the City of Casey (Victoria), 20 years after introducing mandated 24/7 cat containment, the number of cats impounded was still 296% higher than baseline (from 264 cats in 1998 to 1,047 cats in 2019/20), more than double the rate of the human population increase. In 2000, Casey received 349 cat nuisance and related complaints which had increased to 376 complaints in 2020/2021 (Casey Council 2001 & 2021)([APWF 2023](#)) Therefore, mandated containment is not effective over 3 years or 20 years in reducing complaints associated with free-roaming cats, cat impoundments and therefore costs to councils. This failure reflects the impracticality for owners of semi-owned or stray cats to contain cats, and the financial and logistical barriers faced by cat residents in disadvantaged urban environments including in social housing. Therefore, it is important to consider alternative solutions that are both effective and feasible for all community members. We recommend a more nuanced approach that includes supporting the construction of affordable and simple cat enclosures and exploring subsidies for those in need and promoting bedtime feeding where feasible.

While Kingston council is commitment to addressing cat nuisance issues has current emphasis on trapping and impounding as a key response these are both resource-intensive and ultimately ineffective at achieving long-term population control. Trapping programs require significant investment in equipment, staff time, and ongoing impoundment costs, yet fail to address the underlying source of most urban cat populations, semi-owned and unowned domestic cats that are dependent on human food sources and often form strong social bonds with local carers. Studies consistently show that the number of cats removed through trapping is insufficient to meaningfully reduce populations, particularly when breeding continues unchecked in surrounding areas.

Evaluating program success based on the number of traps distributed or cats impounded risks reinforcing a reactive, high-cost cycle rather than solving the root issue. By contrast, proactive, targeted desexing and support programs, particularly those that engage cat carers and semi-owners, deliver far greater and more sustainable outcomes. When given access to free or low-cost desexing, microchipping, and registration, many

carers are willing and able to take full ownership of the cats they feed. This reduces impoundments, limits breeding, and builds trust with the community, while saving councils substantial costs associated with enforcement and shelter care (Cotterell 2024, Cotterell 2025, Rand 2024)

Moreover, framing cats as “trespassers” in need of removal may further alienate residents who are already informally managing the cat population in their area. A more compassionate, cost-effective alternative is to fund community-focused programs that provide practical support, such as desexing assistance, mobile vet services, and positive engagement by Animal Management Officers. These programs not only prevent future complaints but also promote responsible pet care and improve outcomes for animals. Ultimately, councils should shift from measuring success by how many cats are trapped, to how many cats are prevented from entering shelters through supportive, targeted interventions.

To effectively identify all dangerous dogs, menacing dogs and restricted breed dogs in that district and to ensure that those dogs are kept in compliance with this Act and the regulations

Responsible pet ownership education and intervention plays a critical role in managing dogs that may be classified as dangerous or menacing under the law. With the Local Court having the authority to declare a dog as dangerous or menacing based on specific criteria, including the dog's behaviour, or previous classification in another jurisdiction. However, relying solely on court declarations and enforcement actions does little to prevent incidents before they occur, as the damage has already been done. Education provides a proactive alternative, equipping dog owners with the knowledge and skills needed to prevent their pets from developing or displaying aggressive behaviours in the first place.

Education initiatives focused on responsible pet ownership can cover key areas such as early socialisation, obedience training, safe management of dogs in public spaces, and recognising early warning signs of aggression. When delivered in conjunction with community engagement and accessible training resources, these programs empower owners to take responsibility for their dogs' behaviour before escalation requires legal intervention.

One effective method is through property visits by Animal Management Officers (AMOs) with wandering dog complaints, who can then provide tailored advice on containment, supervision, and behavioural management. For example, if a dog has escaped, officers can speak directly with the owner to understand how the dog got out, what challenges they are facing, and suggest realistic, cost-effective solutions, such as repairing fencing, using dog-proof gates, or adjusting routines to reduce anxiety-driven behaviours.

By increasing awareness of owners' legal obligations, such as proper confinement, leash use, and the consequences of aggressive behaviour, education can prevent situations that might otherwise lead to a dangerous or menacing declaration by the court. These one-on-one

interactions help build trust and shift the dynamic from punitive to supportive, empowering owners to take action before enforcement becomes necessary. In doing so, councils and AMOs promote safety and wellbeing for both people and pets in the community, reduce the risk of future incidents, and avoid the financial and emotional burden of legal proceedings. Ultimately, responsible pet ownership education, when delivered through both community programs and direct officer engagement, is key to long-term, sustainable dog management before a dog is declared.

Many dogs that are later declared menacing or dangerous have had previous incidents of roaming or inadequate containment. However, these early issues often go unreported until a more serious event occurs, at which point witnesses or affected individuals demand immediate action. Had the earlier wandering behaviour been reported and addressed as a containment issue, there may have been an opportunity to intervene and prevent escalation.

Banning specific dog breeds has proven to be an ineffective and costly approach to improving community safety (National Canine Research Council 2014). In Victoria, breed-specific legislation led to significant expenditure by councils in legal proceedings, enforcement actions, and compliance monitoring, often without delivering a measurable reduction in dog attacks (National Canine Research Council 2014, Parliament of Victoria 2016, RSPCA Australia 2015). Furthermore, this approach unfairly targets entire breeds rather than focusing on the individual behaviour of dogs and the actions of their owners. Responsible dog ownership and effective dog control should be assessed on a case-by-case basis, with attention given to the specific circumstances and behaviour of the animal involved.

RSPCA Australia's report on preventing dog attacks in the community, states they do not support Breed Specific Legislation (BSL) and these punitive actions fail to prevent further attacks as they do not address the key issues: how to ensure all dog owners are made responsible for the actions of their dogs, and how to reduce the risk of any dog within the general population exhibiting aggressive or dangerous behaviour towards people (RSPCA Australia 2015).

Every dog attack should be evaluated based on the incident itself, not on the breed of the dog. A behaviour-based, rather than breed-based, framework promotes fairness, supports better animal welfare outcomes, and allows councils to allocate resources more efficiently toward prevention, education, and early intervention strategies.

Other matters

It is highly commendable that Kingston's Animal Management Officers (AMOs) are authorised under the Prevention of Cruelty to Animals Act 1986 and take an active role in investigating all reported cruelty cases. This not only ensures that animals in the community are protected but also reflects council's strong commitment to upholding animal welfare standards. The collaboration with the RSPCA further strengthens

enforcement and allows for a coordinated response to serious cases of neglect or abuse.

Additionally, the support provided by AMOs during emergencies, such as heatwaves or bushfire recovery, demonstrates their vital role in community resilience and care.

Best wishes,

Jacquie

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