



Draft Report: Rehoming of Companion Animals in NSW

Rehoming Practices Review

Submission of the
Australian Veterinary Association Ltd

October 2022

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The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. The AVA consists of over 8500 members who come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Discussion

The AVA welcomes and values the opportunity to provide feedback to the NSW Office of Local Government (OLG) on the [Draft Report Rehoming of Companion Animals in NSW](#) (draft report) as part of the [Rehoming Practices Review](#) via this submission and through participation in the consultation workshops.

Whilst we support the Rehoming Practices Review intention to reduce unnecessary euthanasia of companion animals and to increase successful rehoming of companion animals the following provides AVA comments and concerns on the draft report content, draft recommendations, findings, and the activities currently excluded from the review.

The AVA is concerned that the draft report has major gaps; in acknowledging the role of veterinary practices in rehoming processes, in recognising the support that local veterinary practices provide for the community and the negative impacts on the sector by this lack of consideration.

Frequently veterinary practices are the entry point for strays in the rehoming process and should be included for consideration in the NSW Rehoming Practices Review.

Veterinary practices often are the first port of call for many people who have found stray dogs, cats or litters and other community requirements in respect to animal care and reliable information. The community has a perception and/or preference to bring stray dogs and cats to veterinary practices instead of direct to council rangers and pounds through the important and regulated role of veterinarians for animal health and welfare and public safety.

Issues with veterinary practices often being the entry point for strays in the rehoming process but without the support to do so, is clearly demonstrated in the results from the September 2022 [AVA survey: stray and veterinary practices engagement with NSW councils/pounds](#).

The survey results include:

- 96% of respondents advise they receive stray dogs and cats at their veterinary practices
- 81% advised they don't receive payment for looking after strays
- 92% advised the payment does not cover the practices full costs for housing and treating strays.

Respondents to the survey raised the following key issues that needs to be considered as part of the NSW Rehoming Practices Review:

- Most veterinary practices are carrying the financial burden for housing and treating stray dogs and cats before the council collects them, which can be for 2-3 days or if ever.
- Some councils are refusing to collect strays (especially stray cats) and deflecting the responsibility and cost onto vets. This problem is compounded by some councils directing members of the public (or rate paying constituents) to take stray to veterinary practices. Furthermore, several councils have told practices that once an animal is presented to the clinic they become their responsibility, including treating the animal for free.



- Many veterinary practices have reported issues of being unable to contact council after hours, on weekends, public holidays, or during the Christmas/New year break. This results in the practice having to house the animal until council can be contacted.
- Councils frequently take days to collect strays from veterinary practices. Furthermore, when councils take longer than 72hr to collect the animals it can place the veterinary practice in breach of section 63A of the *Companion Animals Act 1998*.
- Often councils are telling veterinary practices to release the stray back onto the streets. This request is contrary to the welfare of the animal and could be considered abandonment under the Prevention of Cruelty to Animals Act. In addition, releasing strays back onto the streets goes against veterinarians good conscience and is in contradiction of the [NSW Veterinary Oath](#) to “*practise veterinary science ethically and conscientiously for the benefit of animal welfare, animal and human health, and the community.*”
- Because there is a community expectation for veterinary practices to take stray dogs and cats, when the veterinary practice declines accepting a stray and refers them onto council, frequently there’s harsh and damaging public backlash. This unjust backlash on the veterinary practice/veterinarian is general via direct abuse, derogatory comments on social media and in negative business reviews which can affect on business viability and the mental health of the staff.

Please see Appendix A for further survey report findings. Appendix B provides a summary of the AVA 2017 survey on how practices are dealing with strays and demonstrates how the issues have progressed since 2017.

The AVA calls upon the NSW Government through this review to investigate solutions for the veterinary sector to be provided for the role that it naturally plays for stray animals within the overall responsibilities for animal health, welfare and public health and to address the key issues outlined above.

Draft report content

Page 2 of the draft report provides a total annual cost of companion animal management in NSW and a diagram of the overall system for rehoming companion animals. This section of the report needs to include recognition of the additional costs to veterinary practices and add veterinary practices into the diagram as an entry point into the rehoming system.

Draft recommendation 1

The NSW Government to establish an ongoing funding arrangement for a community cat program which councils can apply to and could be run in partnership with the RSPCA or a similar experienced body. This would be targeted to councils with the highest cat intakes. Councils would need to show that they can target the areas with the highest problems and to report on outcomes. The expected cost of a program that would reduce cat euthanasia by one third is \$2 million per year on average, initially run over a five year period. Councils would benefit financially from this through reduced pound intakes. However, rather than seeking co-funding from councils, this cost saving would allow councils to redirect resources into increasing adoption rates for remaining animals.

The establishment of a community cat program with ongoing funding arrangements needs to include formal provisions for veterinary practices reimbursement when receiving stray cats.

The great variability of individual local councils to accept or refuse to accept stray cats across NSW creates a difficulty in identifying the areas of need for community cat funding. The AVA therefore recommends the community cat program funding be open to all local government areas across NSW so that the provision of support will be available in the areas of need.



The Community Cat program should consider the welfare of the cats involved and not have a primary focus on reduced euthanasia. Semi-owned and homeless cats under such a program should receive health treatments such as vaccination and anti-parasite treatment and veterinary care if injuries or disease occurs. Welfare of native wildlife, including reptiles, should be considered in the design of such programs. Predation is one important issue. The environmental effect of toxoplasmosis, which results from a treatable nematode infection in cats, on native wildlife occurring in urban and peri-urban areas, highlights the importance of providing ongoing treatment for these cats.

Draft recommendation 2

The NSW Government provide a definition for types of cats, with a model definition below:

- a) *Domestic cats, which have some dependence (direct or indirect) on humans, categorised into:*
 - i. *Owned cats – identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies.*
 - ii. *Semi-owned cats – directly and intentionally fed or provided with some other care by people who do not consider they own them. These cats are of varying sociability, with many socialised to humans, and they may be associated with one or more households.*
 - iii. *Unowned cats – receive food from humans indirectly such as from food waste bins. They are indirectly dependent on humans, may have casual and temporary interactions with humans, and are of varying sociability, including some who are unsocialised to humans.*
- b) *Feral cats, which can be distinguished from domestic cats because they are unowned, unsocialised, have no relationship with or dependence on humans, survive by hunting or scavenging, and live and reproduce in the wild. Feral cats do not receive food from humans directly or indirectly.*
- c) *Infant cats, which is a cat in the first stage of existence and that is not able to feed and fend for itself or is of such age that keeping it within a pound facility would place the cat's welfare at risk*

The AVA has constantly highlighted the need for clear definitions of types of cats in NSW legislation and is very supportive of this recommendation. The [AVA Management of cats in Australia policy](#) provides definitions of types of cat populations, as well as key points for managing cats, recommendations for cat management, and guidelines.

It is however important to accompany these definitions for cat types with clear guidelines for assessing semi-owned, unowned cats and feral cats particularly the process of assessing their sociability. The AVA are concerned that an early assessment of a cat could be miss-identified if it's conducted while the cat is stressed by unfamiliar environment and before it has had an opportunity to acclimatise and it's basic needs met for health and welfare.

Draft recommendation 3

For annual information reporting to OLG, the NSW Government make the following revisions:

- a) *the reason for euthanasia currently classified as 'feral/infant' be split into 'feral' and 'infant'*
- b) *euthanised cats and dogs are entered into a future Companion Animal Register (CAR) if they are not already identified so that all animals are tracked within this system. These animals would have an identifier but would not actually be physically microchipped*
- c) *approved rehoming organisations report separately for cats and for dogs*
- d) *consideration be given to reporting of animal complaints*
- e) *consideration be given to being able to prepare automatic reports to councils on rehoming outcomes from rehoming organisations through the redeveloped CAR*

The AVA suggests providing clarity for this recommendation that this reporting requirement is only applicable for animals euthanised in the rehoming systems. This is to differentiate from dogs and cats euthanised by a veterinarian as part of the animals' end treatment.

Draft recommendation 4

Administrative arrangements for rehoming organisations be adjusted to:

- a) *allow approved rehoming organisations limited access to the CAR to minimise administrative requirements for rehoming organisations and councils*
- b) *remove the requirement to provide information when an animal changes from one foster home to another. Animals would be linked to the rehoming organisation*



Supported.

Draft recommendation 5

Behaviour assessment arrangements be revised so that:

- a) *councils are able to undertake assessments of whether an animal is suitable for rehoming before advertising to rehoming organisations*
- b) *councils are able to euthanise animals where there are work health and safety concerns for keeping the animal*
- c) *training programs for behaviour assessment for council staff are supported by NSW OLG, which could include financial support and coordination.*

It is critical that behaviour assessments undertaken by council are not conducted immediately. A dog or cat will be stressed by being in an unfamiliar environment or not having basic needs met which may lead for it to be incorrectly classified in the behaviour assessment. Dogs and cats should be provided enough time to acclimatise and recover before an assessment is undertaken.

The AVA is supportive of recommendation 5c for council staff to be trained to undertake behaviour assessments if the training provided is robust and conducted on a regular basis. Furthermore, to ensure council staff are suitably skilled to undertake behavioural assessments such training could be linked to an annual certification scheme with ongoing requirements for continued education and training.

Draft recommendation 6

The identification and registration system be revised to:

- a) *remove the annual permit fee for non-desexed cats*
- b) *waive registration fees for cats through Community Cat programs similar to the waiving of registration fees for rehoming organisations*
- c) *waive registration fees for animals that are returned to owners from pounds, where this is needed as an incentive for return to owner*
- d) *make registration (i.e. payment) for an animal occur at the same time as identification. This would mean people selling or giving away animals would be responsible for registration. Note that we would like stakeholder feedback on whether this would reduce animals being microchipped*
- e) *registration payments would be equal and include a **voucher for desexing** that goes with this fee, valid for a year. This allows for the desexing incentive to be retained, and identification and registration payment to be combined. The desexing would therefore not be as time limited as is currently the case*
- f) *require any animal sold or given away to be registered*

The AVA advises against recommendation 6e to implement desexing vouchers in NSW. The Victorian Cat and Dog Reduced Fee Desexing Voucher scheme was fraught with unintended consequences and will conclude by the end of 2022. Whilst the AVA is supporting of initiatives to provide low cost desexing services to increase compliance, such voucher schemes impose the financial burden of increasing public compliance through low cost schemes onto veterinarians who must also absorb the high costs to provide Australian standards of veterinary practice. Significant financial pressures for local veterinary practices to provide community services, such as desexing and rehoming, without adequate government support is having a great impact on the veterinary profession sustainability overall.

If a voucher scheme were introduced in NSW, it should be combined with a subsidy provided to the veterinarian to cover the short fall between the voucher cost and the actual cost for the procedure.

Draft recommendation 7

OLG should send messages to all dog and cat owners via text (or email) to remind them to update any relevant information on the CAR – this is already being advanced through the rebuild of the Companion Animal Registry

The AVA is supportive of recommendation 7 for messages to be sent to all dog and cat owners reminding them to update information in the Companion Animal Registry. Further to this process, the information being updated should include advising if the dog or cat has been re-homed, lost or deceased.



Draft recommendation 8

Make it mandatory for animals rehomed or sold through council pounds or rehoming organisations to be desexed, unless there is a cruelty or health reason not to.

Supported.

Draft report other findings

We consider that revised standards for pound facilities to ensure animal welfare standards should be developed. This is not a formal recommendation as it is not within our terms of reference. However, it has been raised by numerous stakeholders.

Activities that we are not currently recommending but could be considered further in the future include:

- increased regulation of rehoming organisations alongside government funding for these organisations, or a grant program if euthanasia rates for animals remain steady or increase*
- government support in terms of loan guarantees or loans for major new pound facilities*
- increasing the rights of tenants to have pets, similar to changes made in Victoria and Queensland*
- introducing a rewards system for people who register their pet in partnership with pet stores.*

We seek feedback from stakeholders on whether there are practical ways to implement actions in these areas that could contribute to the objectives of the review, and their benefits and costs.

The AVA are supportive of including the other findings in the Rehoming Practices Review as they all have impacts on the rehoming rates. We note however:

- whilst we're supportive of a government funded grant program for rehoming organisations, such funding should not be tied to euthanasia rates which can be variable due to a range of factors.
- the AVA is supportive of increasing the rights of tenants to have pets, but such provisions need to ensure the environments are suitable to keep pets in.

Contact:

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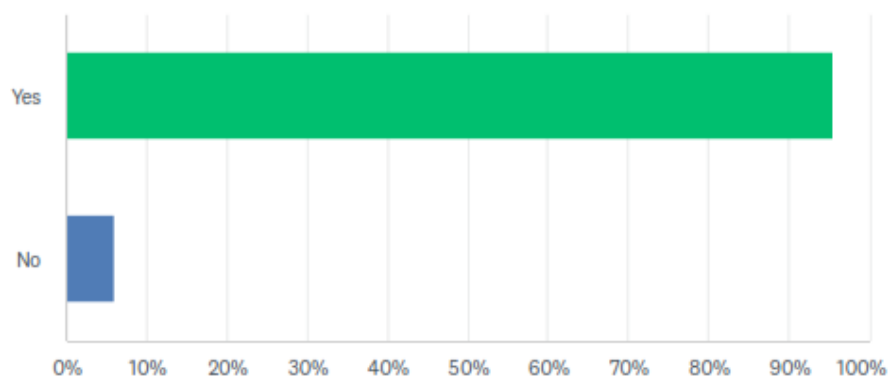


Appendix A

AVA 2022 Survey: Strays and veterinary practices engagement with NSW councils/pounds

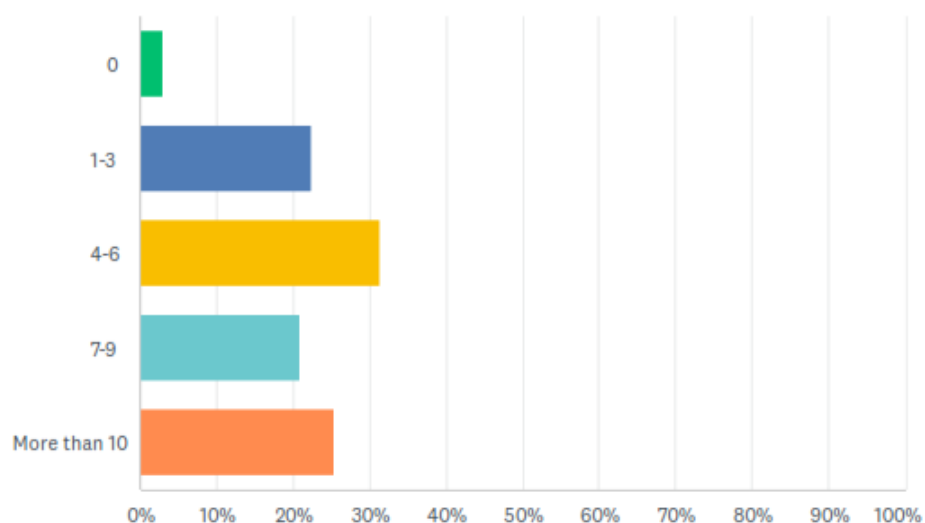
Q3 Do you receive stray dogs and cats at your veterinary practice?

Answered: 68 Skipped: 1



Q4 On average, how many stray dogs are presented to the practice each month?

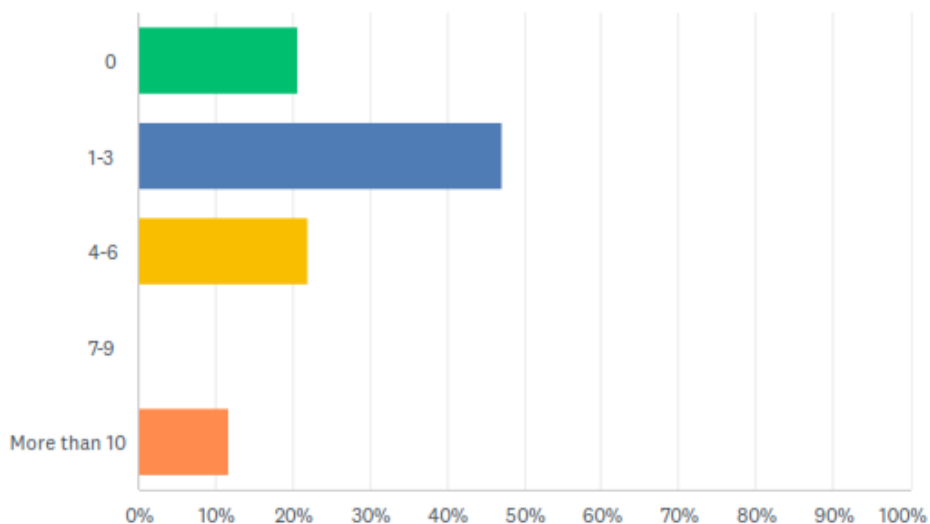
Answered: 67 Skipped: 2





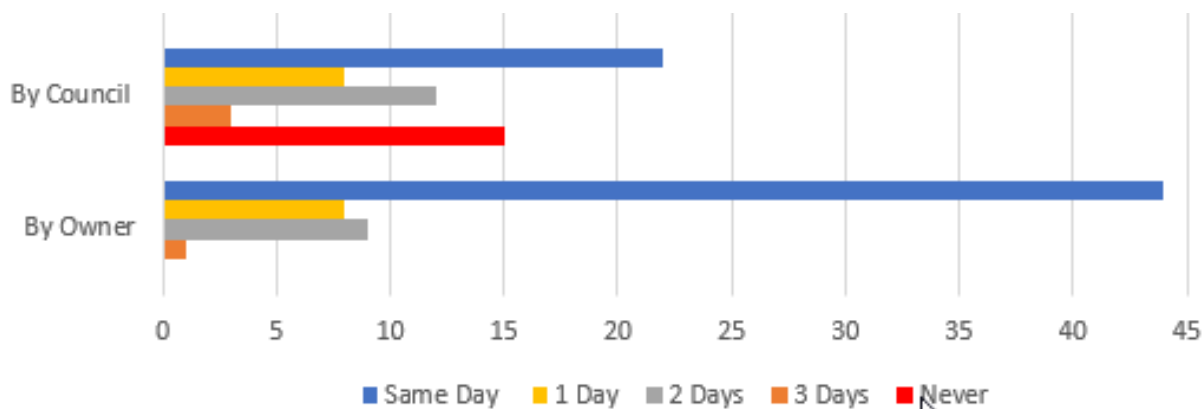
Q5 On average, how many stray cats are presented to the practice each month?

Answered: 68 Skipped: 1



Q6 On average, how long does it take for strays to be picked up from the veterinary practice?

Answered: 64 Skipped: 5

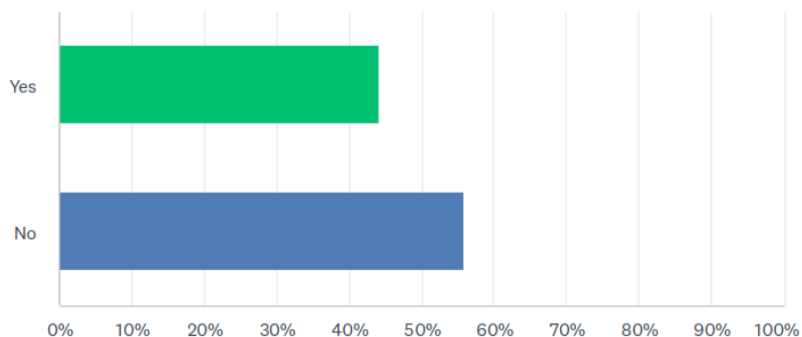


Respondents



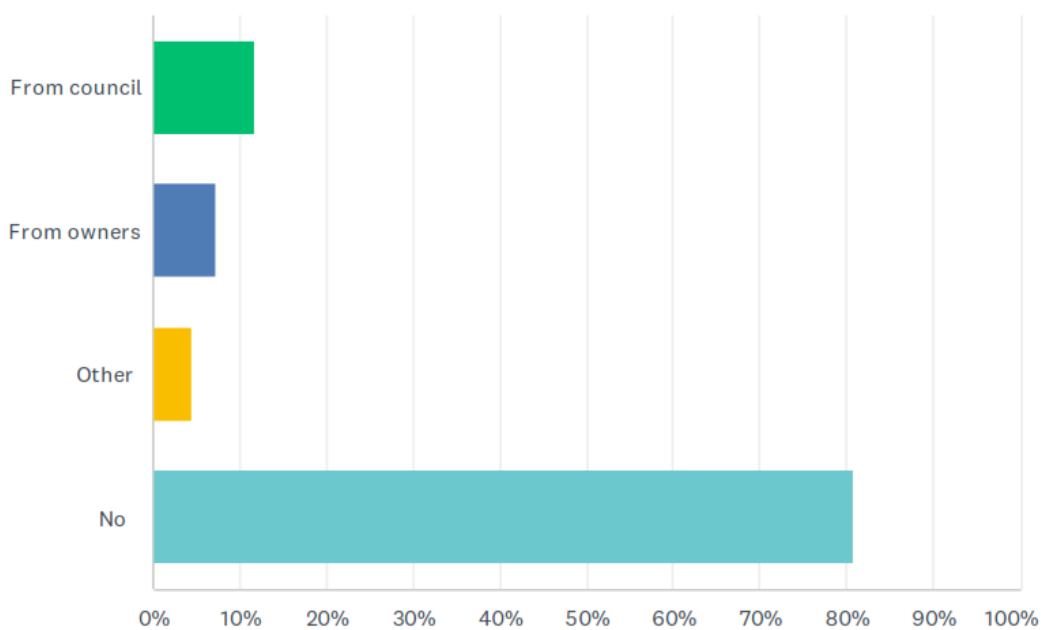
Q7 Do you have an arrangement with the local council, pound or rangers to deal with strays?

Answered: 68 Skipped: 1



Q8 Do you receive payment for looking after strays?

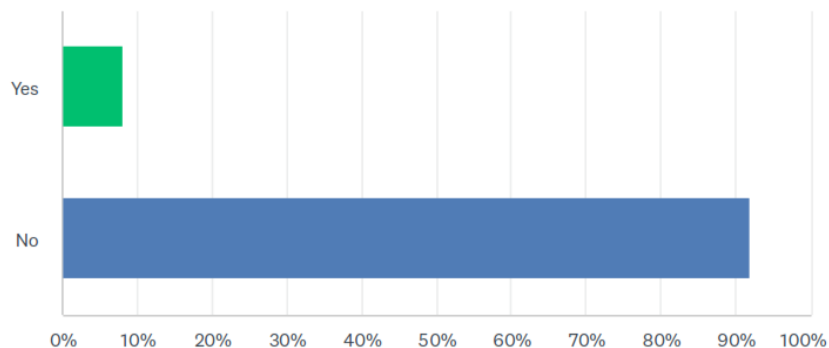
Answered: 68 Skipped: 1





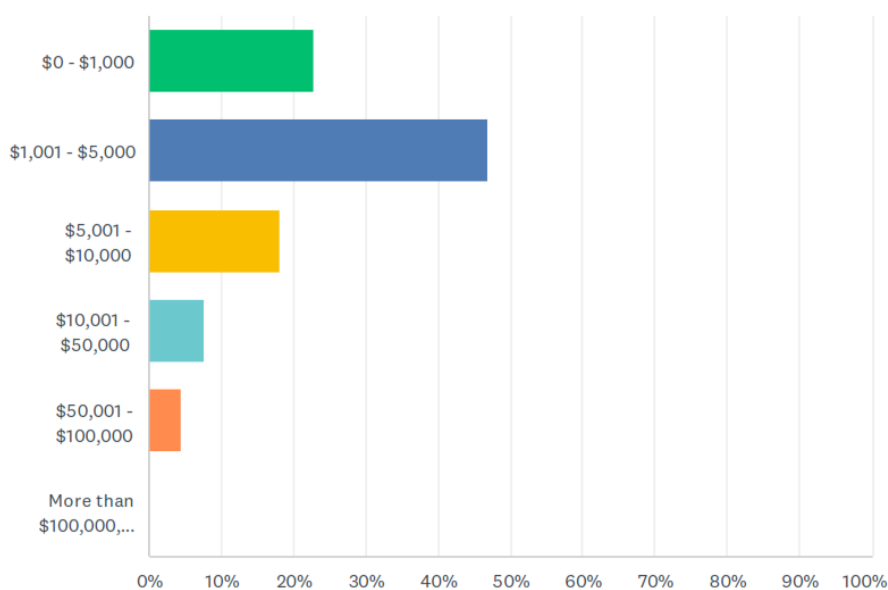
Q9 Does the payment cover the practice's full costs for housing and treatment of the stray?

Answered: 62 Skipped: 7



Q10 On average per year, please provide an estimate of your veterinary practice's out-of-pocket costs for housing and treating strays

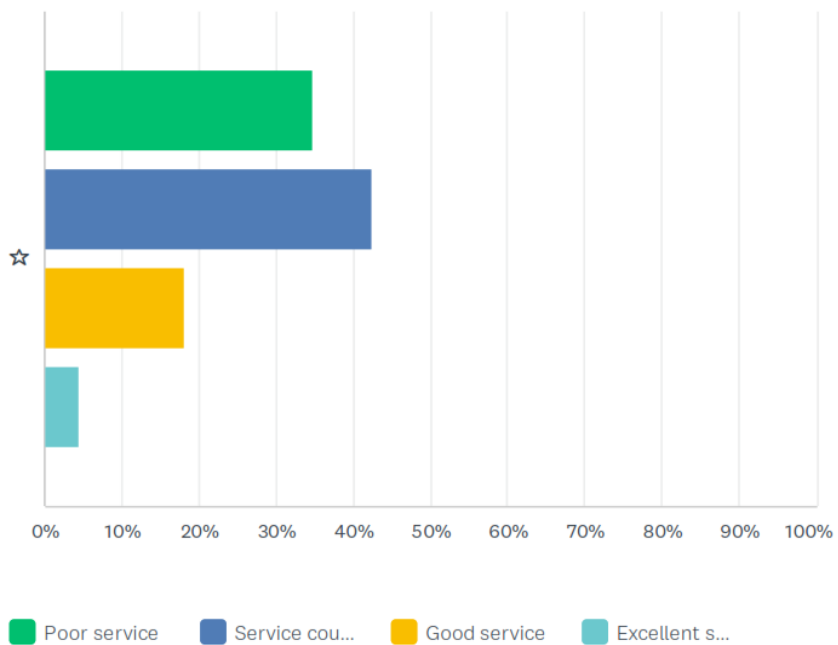
Answered: 66 Skipped: 3





Q11 How do you rate your interaction with the council/pound with regards to stray animals?

Answered: 66 Skipped: 3



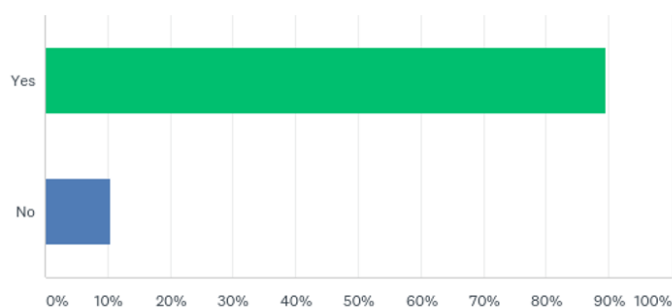


Appendix B

AVA 2017 Survey: How are practices dealing with strays

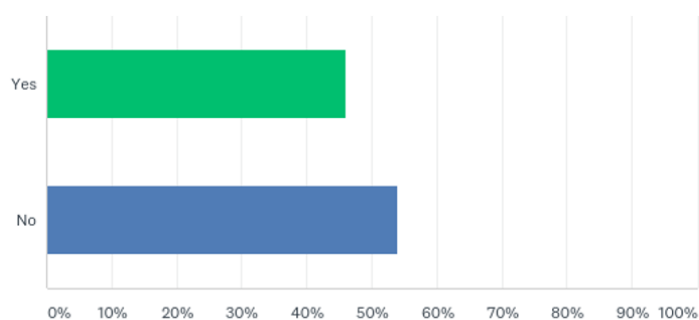
Q1: Do you have a problem with stray dogs being taken to your practice?

Answered: 76 Skipped: 0



Q3: Do you have an arrangement with the local council / council pound or rangers to deal with strays?

Answered: 74 Skipped: 2



Q5: Do council rangers pick up strays promptly from your practice?

Answered: 71 Skipped: 5

