

Victoria needs exemption from 'abandonment' - to save the lives of Community Cats. Please make a submission to the new Victorian Animal Care and Protection Act by March 25, 2024. There are two parts for submissions - a document/form on only the draft Text, and a Regulations Survey. Please submit in both parts: Upload your document (as the online form can delete sections); and also fill-in the Regulations Survey. Written submissions can only challenge the Act wording. We can only comment/feedback on the Act in the Regulations.

Please ask for this Exemption in both: **Part 3 Division 2, 21 (1)(d)** '*person abandons the animal*' : Exemption for Trap Neuter Return and Return to Field programs when run by trained/qualified authorised officers, or specialists in cat management.

Animal Justice Party Guide for submissions to the draft 'Animal Care and Protection Act' :

https://assets.nationbuilder.com/animaljusticeparty/pages/2702/attachments/original/1709183925/AJP_Guide_to_Animal_Care_and_Protection_Bill_and_its_supporting_regulations.pdf?1709183925

AJP Video Guide: <https://www.youtube.com/watch?v=Y3bJX8dWsqA>

Info for cats: <https://www.change.org/p/knox-advocats/u/32397458>

Only individual submissions to Engage Victoria help. (Signatures on petitions are rejected)

Please make a Document/Form submission in your own name, and words.

Please also make Comments in the Regulations survey, adding the Exemption for TNR, and review the Code of Practice for the Private Keeping of Cats

<https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/domestic-animals-act/codes-of-practice/code-of-practice-for-the-private-keeping-of-cats>

Engage Victoria submissions:

<https://engage.vic.gov.au/project/new-animal-welfare-act-victoria/page/make-a-submission-on-the-draft-bill>

Thank you, Ashley morgan-shae@ihug.com.au

Knox AdvoCats - Submission on draft Victorian Animal Care and Protection Bill
Victoria, Australia

Legislative Reform Team
Department of Jobs, Skills, Industry and Regions
1 Spring St, Melbourne Victoria 3000

Dear Legislative Reform Team,

Sentience of animals is important - so too is an Act that prevents cruelty to all animals in Victoria. Removing the title of Prevention of Cruelty to all Animals, to turn to 'Care' and 'Protection', shifts public perception of the awareness of cruelty - to presumed 'care'. Will introduced animals suffer more under this Act?

Part 3 Division 2, 21 (1)(d) *'abandons the animal'* makes Trap Neuter Return, and Return to Field programs illegal. Community Cat Programs are scientifically proven to lower homeless cat numbers quickly, and at low cost. Curfews' trapping and euthanasia do not work, fail to save wildlife, cost over six times more, and raise the homeless population.

Part 3 Division 2, 21 (1)(d) Please make an: Exemption for Trap Neuter Return and Return to Field programs when run by trained/qualified authorised officers, or specialists in cat management.

Please could you remove *'approved industry arrangements'*, *'sport'* and *'exceptions'* for animal industries. Disregard of animal sentience, means that Victorian animals are exposed to cruelty by the animal industries, which cannot then be fairly examined, or charged with cruelty. There is no protection from cruelty to animals, with industry exemptions to hunt, maim, wound and kill inhumanely. Animal industries cannot make fair judgements. Allow courts to decide on animal harm cases.

What is 'reasonable' is not defined. Please remove the term 'reasonable' and qualify exactly.

Please could Victoria lower pound intake and euthanasia by legalising, humane and effective, Community Cat Programs - Trap Neuter Return.

Please require correct terminology: Cats to be categorised based on how and where they live. Accordingly, the Australian Pet Welfare Foundation recommends that cats should be recognised as feral or domestic, consistent with the RSPCA's Best Practice Domestic Cat Management (2018). This is consistent with the 2015 TAP, which classified cats as feral, stray, or domestic. Please cease calling homeless cats 'feral' and/or 'wild'. Homeless stray cats, which live in and around where humans live or frequent, are not feral cats.

Please cease 24-hr cat curfews - which raise stray populations, 'farm kittens', cost all residents much more for trapping and euthanasia, rise shelter-workers suicide-risk, and harm community mental-health.

Please require 'authorised officers' to complete training, including in animal sentience, before being 'authorised'. Currently they are 'authorised' by Manager's request to the Minister without undergoing appropriate training.

Please require a veterinary psychiatrist, or postgraduate with training/qualifications, to assess 'behaviour' issues before condemning to death trapped, frightened cats, and 'dangerous dogs'.

Please stop the practice of taking unclaimed pound animals for scientific testing.

We ask Victoria, and the Federal Government, to cease funding of animal experimentation.

Please end traps, and Councils' loan of 'free traps', by which Knox Council caused Mytzle's death.

<https://www.heraldsun.com.au/leader/outer-east/cat-traps-that-led-to-mytzles-death-still-unavailable-from-knox-council/news-story/a1b651d68ca6e97a2e3046ff2e3dd373>

Please consider fines for Local Councils when decisions are not based on 'best available scientific evidence'. Also for Councils which disseminate public misinformation affecting animals', and carers', welfare.

Without an effective Victorian Integrity 'watchdog' for concerned animal-carers, there is an Urgent need for an Independent Authority for Animals. Please consider a Victorian Animal Authority to have jurisdiction over Local Councils and animal industries.

143 Knox AdvoCats applied to the Victorian Ombudsman for consultation adhering to the Local Government Act 2020. The Victorian Ombudsman then altered fact, figure, and date for Council - preventing consultation. Evidence was not examined, and there was no correction of partiality and inaccuracy. 143 complainants have been hidden from report and public media.

Council pounds do not have the capacity to house and care for seized animals with cruelty cases. Dogs' health and wellbeing is compromised waiting for court hearings. An independent advocate could oversee welfare.

Please ban 1080 poison which kills cats, dingo pups, Wedge-tailed eagles, native marsupials and pet dogs in torturous pain, and poisons habitat.

Please prohibit the maiming and mutilation of farm animals. Please end battery caging.

Please phase out the hunting of animals, and authorise humane methods of lowering populations. Please stop killing Australian brumbies, native dingoes, and kangaroos.

Please consider how animals are used and discarded in racing, in sport, and entertainment, throughout their lifespan and retirement.

Please consider Australian Pet Welfare Foundation's scientific evidence:

APWF talk on Community Cat Programs in Australia:

<https://www.youtube.com/watch?v=PQbK3R36Xjg>

Australian Pet Welfare Foundation on 'cat containment':

<https://petwelfare.org.au/2022/08/31/australian-pet-welfare-foundation-position-statement-on-cat-containment/>

24-hr cat curfews fail Victoria - have failed in Casey and the Yarra Ranges:

<https://petwelfare.org.au/2022/09/02/key-issues-to-consider-related-to-mandated-24-7-cat-containment/>

Way to prevent this pointless killing:

<https://theconversation.com/australian-shelters-and-pounds-kill-50-000-mostly-healthy-cats-and-kittens-in-a-year-theres-a-way-to-prevent-this-pointless-killing-201947>

Full scientific article in 'Animals': <https://www.mdpi.com/2076-2615/13/11/1771>

The Impact of Lethal, Enforcement-Centred Cat Management on Human Wellbeing: Exploring Lived Experiences of Cat Carers Affected by Cat Culling at the Port of Newcastle:

<https://www.mdpi.com/2076-2615/13/2/271?fbclid=IwAR2GgLTAULJoaBhVuVsrPIG59S5dV54OhoPQexarznCH57jfzWuojhw3xs>

Appendix 1 in the Code of Practice for the Private Keeping of Cats, does not list the Australian Pet Welfare Foundation, instead listing many organisations which use failed, and costly, methods of curfews, trapping, and killing more cats.

With Conscience,

Knox AdvoCats

Save Cats, Save Wildlife

<https://www.change.org/knoxcatcurfew>

<https://www.change.org/p/knox-council-review-knox-council-s-plans-for-24hr-cat-curfew>

<https://www.change.org/StopKnoxCatCurfew>